

North East Planning Committee

County Hall, County Buildings, Cupar

Wednesday, 11 September 2024 - 1.30 p.m.



AGENDA

Page Nos.

1. **APOLOGIES FOR ABSENCE**
2. **DECLARATIONS OF INTEREST** – In terms of Section 5 of the Code of Conduct, members of the Committee are asked to declare any interest in particular items on the agenda and the nature of the interest(s) at this stage.
3. **MINUTE** – Minute of Meeting of North East Planning Committee of 14 August 2024. 3 – 5
4. **23/02309/PPP - CRAIL AIRFIELD, BALCOMIE ROAD, CRAIL** 6 – 57

Planning permission in principle for a mixed use development comprising holiday accommodation site (91 self-build holiday units), craft workshops/light industrial (Class 4) and storage buildings (Class 6) and associated infrastructure including footpaths, cycle paths, roads and parking areas (demolition of existing buildings).
5. **23/02628/FULL - LAND TO THE NORTH OF ABBEY COTTAGE, ABBEY WALK, ST ANDREWS** 58 – 78

Erection of 5 dwellinghouses - Site: Former Gas Holder Site, Balfour Place, St Andrews.
6. **APPLICATIONS FOR PLANNING PERMISSION DEALT WITH UNDER DELEGATED POWERS.**

<https://www.fife.gov.uk/kb/docs/articles/planning-and-building2/planning/planning-applications/weekly-update-of-applications2>

Members are reminded that should they have queries on the detail of a report they should, where possible, contact the report authors in advance of the meeting to seek clarification.

Lindsay Thomson
Head of Legal and Democratic Services
Finance and Corporate Services

Fife House
North Street
Glenrothes
Fife, KY7 5LT

4 September 2024

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BLENDING MEETING NOTICE

This is a formal meeting of the Committee and the required standards of behaviour and discussion are the same as in a face to face meeting. Unless otherwise agreed, Standing Orders will apply to the proceedings and the terms of the Councillors' Code of Conduct will apply in the normal way

For those members who have joined the meeting remotely, if they need to leave the meeting for any reason, they should use the Meeting Chat to advise of this. If a member loses their connection during the meeting, they should make every effort to rejoin the meeting but, if this is not possible, the Committee Officer will note their absence for the remainder of the meeting. If a member must leave the meeting due to a declaration of interest, they should remain out of the meeting until invited back in by the Committee Officer.

If a member wishes to ask a question, speak on any item or move a motion or amendment, they should indicate this by raising their hand at the appropriate time and will then be invited to speak. Those joining remotely should use the "Raise hand" function in Teams.

All decisions taken during this meeting, will be done so by means of a Roll Call vote.

Where items are for noting or where there has been no dissent or contrary view expressed during any debate, either verbally or by the member indicating they wish to speak, the Convener will assume the matter has been agreed.

There will be a short break in proceedings after approximately 90 minutes.

Members joining remotely are reminded to have cameras switched on during meetings and mute microphones when not speaking. During any breaks or adjournments please switch cameras off.

THE FIFE COUNCIL - NORTH EAST PLANNING COMMITTEE – BLENDED MEETING

County Hall, County Buildings, Cupar

14 August 2024

1.30 pm – 3.50 pm

PRESENT: Councillors Jonny Tepp (Convener), Al Clark, Fiona Corps, Sean Dillon, Alycia Hayes, Gary Holt, Louise Kennedy-Dalby, Robin Lawson, Jane Ann Liston, Donald Lothian and David MacDiarmid.

ATTENDING: Alastair Hamilton, Service Manager, Development Management, Matthew Don, Graduate Planner, Scott Simpson, Planner, Development Management; Steven Paterson, Solicitor, Planning and Environment and Diane Barnett, Committee Officer, Legal and Democratic Services.

APOLOGIES FOR ABSENCE: Councillors John Caffrey, Margaret Kennedy and Allan Knox.

169. DECLARATIONS OF INTEREST

No declarations of interest were submitted in terms of Standing Order No. 22.

170. MINUTE

The committee considered the minute of meeting of the North East Fife Planning Committee of 5 June 2024.

Decision

The committee approved the minute.

171. 23/02628/FULL - LAND TO THE NORTH OF ABBEY COTTAGE, ABBEY WALK, ST ANDREWS (SITE: FORMER GAS HOLDER SITE, BALFOUR PLACE, ST ANDREWS)

The committee was advised that this application for the erection of five dwelling houses had been withdrawn from consideration at this meeting.

Decision

The committee agreed to defer consideration of the application to a future meeting of the committee.

172. 24/00785/FULL - EDEN SPRINGS COUNTRY PARK, MELVILLE LODGES, BOW OF FIFE

The committee considered a report by the Head of Planning Services relating to an application for a change of use from a former quarry to a holiday site, including the erection of up to 75 holiday lodges, reception arrival building, management/maintenance facilities, play areas, linked network of pathways/footways/cycle ways, car park and associated works.

Decision

The committee:-

- (1) refused the application on the grounds that the proposed development did not comply with the relevant Policies of the National Planning Framework 4 (NPF4) (2023) and the Adopted FIFEplan (2017) (LDP):
 - (a) sustainable transport and road safety – policies 1, 2 13, 14 and 30 of NPF4; policies 1, 3, 7 and 11 of the LDP; and Making Fife’s Places Supplementary Guidance 2018;
 - (b) natural environment and biodiversity – policies 3, 4 and 6 of NPF4 and policies 1, 7, 12 and 13 of the LDP; and Making Fife’s Places Supplementary Guidance 2018;
 - (c) safeguarding the visual amenity, character and protecting the environmental quality of the countryside location – policies 4, 7, 14, 29 and 30 of NPF4; policies 1, 7, 10, 13 and 14 of the LDP; and Making Fife’s Places Supplementary Guidance; and
- (2) agreed to delegate to the Head of Planning Services, in consultation with the Head of Legal and Democratic Services, to finalise the full reasons for refusal in order to ensure that a decision on the application was not unduly delayed.

The committee adjourned at 2.50 pm and re-convened at 3.00 pm.

173. 24/00390/FULL - GARDEN 1, GREYFRIARS GARDEN, ST ANDREWS

The committee considered a report by the Head of Planning Services relating to an application for a change of use from private garden ground (Class 9) to siting of a coffee kiosk and outdoor seating area (Class 3).

Decision

The committee:-

- (1) refused the application on the grounds that the proposed development did not comply with the relevant Policies of the National Planning Framework 4 (NPF4) (2023) and the Adopted FIFEplan (2017) (LDP):
 - (a) visual impact on the character and appearance of the St Andrews Conservation Area and the surrounding historic environment – policy 7 of NPF4; policies 1, 10 and 14 of the LDP; Historic Environment Scotland’s Historic Environment Policy for Scotland

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(2019); and Fife Council St Andrews Conservation Area Appraisal and Management Plan (2010);

(b) visual amenity – policy 14 of NPF4; policies 1, 10 and 14 of the LDP; and Making Fife’s Places Supplementary Guidance (2018); and

(2) agreed to delegate to the Head of Planning Services, in consultation with the Head of Legal and Democratic Services, to finalise the full reasons for refusal in order to ensure that a decision on the application was not unduly delayed.

174. 24/00876/FULL - HAWKSWOOD COUNTRY ESTATE, PEAT INN, FALFIELD

The committee considered a report by the Head of Planning Services relating to an application for the siting of a caravan for residential use (retrospective).

Decision

The committee approved the application subject to the two conditions and for the reasons detailed in the report.

175. APPLICATIONS FOR PLANNING PERMISSION DEALT WITH UNDER DELEGATED POWERS.

Decision

The committee noted the list of applications dealt with under delegated powers since the previous meeting.

Committee Date: 11/09/2024

Agenda Item No. 4

Application for Planning Permission in Principle **Ref: 23/02309/PPP**

Site Address: **Crail Airfield Balcomie Road Crail**

Proposal: **Planning permission in principle for mixed use development comprising holiday accommodation site (91 self-build holiday units), craft workshops/light industrial (Class 4) and storage buildings (Class 6) and associated infrastructure including footpaths, cycle paths, roads and parking areas (demolition of existing buildings)**

Applicant: **Ground Developments Ltd, Ground Developments Ltd
Burnhouse Industrial Estate**

Date Registered: **14 September 2023**

Case Officer: **Scott Simpson**

Wards Affected: **W5R19: East Neuk and Landward**

Reasons for Referral to Committee

This application requires to be considered by the Committee because the application is for a Major Development in terms of the Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009

Summary Recommendation

The application is recommended for: Conditional approval requiring a legal agreement

1.0 Background

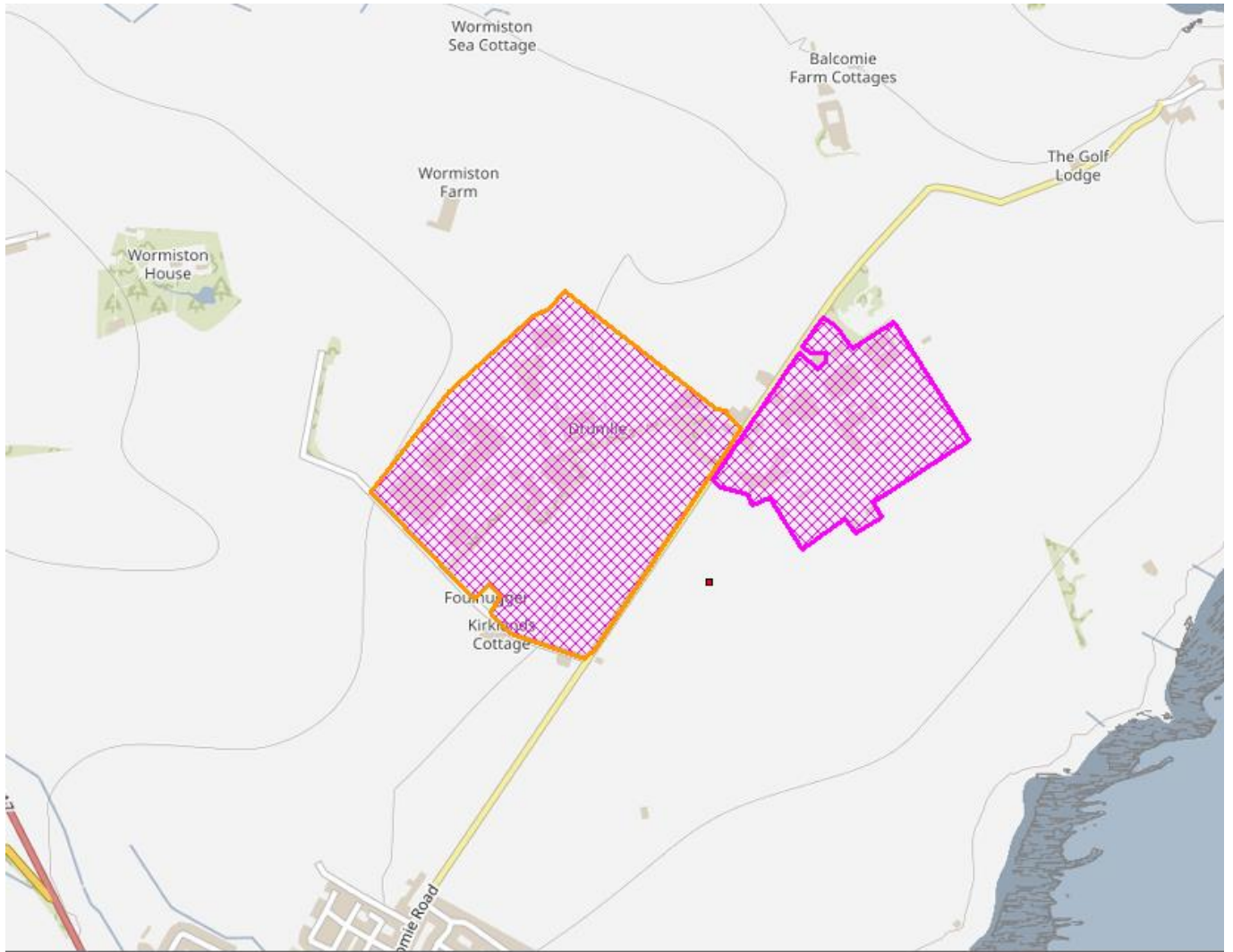
1.1 The Site

1.1.1 This application relates to the disused Crail Airfield which is located outwith any settlement boundary and approximately 0.5 kilometres to the north of Crail Village as designated within the Adopted FIFEplan (2017) (LDP). The former airfield is split into two areas (the accommodation area to the north-west and the technical area to the south-east) and access to the airfield is taken from Balcomie Road (C Class Distributor Road) which travels along the southern boundary of the accommodation area, and this begins at Crail to the south-west. The site consists of concrete and tarmac roadways, grassed field areas and numerous redundant buildings associated with the former use of the site as MOD airfield. A number of these buildings are in a poor state of disrepair and have corrugated iron and brick finishes. The

airfield runways to the south of the site are a Scheduled Monument first scheduled in 1997 and rescheduled in 2006. These runways do not form part of the application site. The site includes various Category A, B and C listed buildings with a total of 33 listed buildings within the overall site including a workshop building, storage buildings, an engine and aircraft repair shop building, an office building, a sick bay building, officer's quarters buildings and an army personnel building. The site is bound to the south by agricultural land which separates Crail from the airfield, whilst a race car area is located to the south on the former runways. The centre of the settlement of Crail is designated as a Conservation Area as per the LDP. The site is located on an area of potentially contaminated land due to the historic land uses of the site. A Core Path (P071/04 - Crail coast to Wormiston) runs past the south-western and western boundary, whilst a proposed future Core Path (PF52 – Crail to Crail Airfield) runs adjacent to the south-eastern boundary of the site. Balcomie Road is also part of the Core Path Network (P073/01 - Kilminning coast to Crail via Road). The majority of the site is included on the Vacant and Derelict Land Register as a derelict site with the north-west part of the site shown as West Balcomie Road (LEN019) and the southern part of the site shown as East Balcomie Road (LEN004). There are three designated sites on the coast approximately 765 metres to the south-east of the application site. Fife Ness Coast Site of Special Scientific Interest (SSSI) joins onto the Firth of Forth SSSI and they both overlap with the Firth of Forth Special Protection Area (SPA). Several buildings within the site are also on the Building at Risk Register including the Laboratory Trainer Building, the Engine, Aircraft and Repair Shop, the Torpedo Attack Training Building and the Control Tower Building.

1.1.2 Several residential dwellings are located adjacent to the south-west boundary of the application site including Kirklands Cottage, Seafield, Taobh Na Mara, Viewfield and Foulhoggar. Taobh Na Mara is located directly next to Balcomie Road with the other dwellings located 122 to 264 metres to the north-west of Balcomie Road. These dwellings are also located between approximately 113 and 335 metres to the south of the proposed holiday accommodation site which would be within the northern accommodation area. Wormiston House and Wormiston Farm are located approximately 592 metres to the north-west and approximately 407 metres to the north-east of the site. Crail Golf Course is also located to the east of the site.

1.1.3 LOCATION PLAN



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1.2 The Proposed Development

1.2.1 This application is for planning permission in principle (PPP) for a mixed-use development comprising holiday accommodation site (91 holiday units), craft workshops/light industrial (Class 4) and storage buildings (Class 6) and associated infrastructure including footpaths, cycle paths, roads and parking areas (demolition of existing buildings).

1.2.2 The submission includes a Masterplan for the site, and this sets out a framework for the development of Crail Airfield as a mixed-use community. It sets out how the set could be developed and sets out a number of proposed uses for different parts of the site. The Masterplan for the site includes the change of use of the existing buildings on site including the Torpedo Attack Training Building, Torpedo Workshop Building, the engine and aircraft repair shop building, an office building, a sick bay building, officer's quarters buildings and an army personnel building. These parts of the proposal which include the change of use of buildings or land cannot legally be dealt with under the scope of a PPP application as a PPP cannot deal with a change of use of land or buildings and can only deal with operational development. The quantum of development shown within the Masterplan including the principle of these proposed uses will be assessed and commented upon under this application, however, further detailed full planning applications along with applications for listed building consent will be required for these parts of the proposal to be fully assessed and determined. This application will, therefore, only be fully assessing the principle of the proposed holiday units, craft workshop/light industrial and storage buildings and associated infrastructure including footpaths, cycle paths, drainage

infrastructure, roads and parking areas. The submitted information such as the Transport Assessment, Ecology Report and Masterplan do, however, assess the impact on the site and surrounding area for the re-development of the whole site including the change of use of the existing buildings and the erection of new buildings on the site. Any future application for full planning permission should then take into account the Masterplan, should it be approved as this would form part of the planning history for the site.

1.2.3 The overall site layout shows that the proposal would include the northern (accommodation area) and southern area (Technical Area) of the former airfield. The submission advises that the northern accommodation area was used historically for sleeping accommodation and leisure accommodation with the southern technical area having been used for the main functions of the airfield including flight training, surveillance, repair, and maintenance. The proposed 91 holiday accommodation units would be located within the northern accommodation area of the site, and these units would be situated in uniform rows across the site. Landscaping in and around the proposed holiday site would include new tree belts and hedgerows and the existing roads would be utilised along with the formation of new internal access roads and footpaths/cycle paths. The existing unlisted buildings would be demolished to make way for the proposed holiday units, whilst the two Category C Listed buildings would also become holiday accommodation units and would either be carefully restored or replaced. The proposal would also include a large parkland area to the south of this holiday site which would be open to the public. The proposed light industrial (Class 4) and storage and distribution (Class 6) buildings would be located within the eastern area of the southern Technical Area of the airfield. The submitted site plan shows six new buildings located within this area and the submission advises that these could be used by small local businesses such as offices, workshops, warehouse storage, small distilleries, pottery and carpentry. A series of paths and connections are also shown throughout the site, and these would connect to the surrounding core paths. A bus stop and turning area are also proposed next to the existing gymnasium/cinema building within the accommodation area.

1.2.4 A set of Design Guidelines (DG) has been submitted for the 91 holiday accommodation plots on the northern accommodation area of the site and these state that it is considered beneficial for a set of typical plot design guidelines to be incorporated within the PPP approval. The applicant advises that these units would not meet the legal definition of a caravan as set out in the Caravan Sites and Control of Development Act 1960 (as amended) and the Caravan Act 1968. The DG sets out the potential massing of the properties and the proposed landscaping and hardstanding areas to be included within the plots. An indicative site layout is also included with the DG. The DG set out that an example plot area would be no more than 800 square metres with each plot including a 280 square metre development area with these areas being positioned equally between plot boundaries and the development area being positioned 8 metres back from the street frontage. The proposed holiday homes would have pitched roofs with eaves at a maximum of 3 metres above ground level and ridges at no more than 4.5 metres above ground level. The DG states that paved driveways would only be permitted up to a maximum 40% of the front garden area and a native species hedgerow would be planted where plots front onto access roads. The proposed landscaping would include a native woodland tree and shrub planting strip which frames each plot to the sides and rear, typically between 2 to 6 metres in width.

1.2.5 The overall Masterplan for the site also includes the above proposals and shows how the site could be developed. This shows that the northern accommodation area would include a holiday site with 91 units, whilst the existing Category B Listed gymnasium/cinema building would be converted to a market hall (Use classes 1, 3, 4 or 11). Various roads, footpaths/cycle paths, parking areas and landscaped areas are shown throughout the northern part of the site with the southern half of the accommodation area to be used as a public open space parkland area which the public can use for woodland and nature walks.

1.2.6 The southern Technical Area includes numerous listed buildings, and the Masterplan document proposes various uses for each of these buildings. It also shows two large areas within the centre and to the south-east corner of the site which would be a public park and rewilded areas with pathways for pedestrians and cyclists. The Category A Listed engine and aircraft repair shop building would be converted to a 50-bedroom hotel with parking and associated grounds (Classes 7, 8, 9 or 10). The central north-western area of the site which includes a mixture of unlisted and Category B and C Listed buildings including a torpedo workshop building and aircraft painting hangar building would be converted to an open-air museum area (Classes 1, 2, 10 and 11). The submission advises that key buildings would be preserved within this area to form a museum cluster, with internal/external interpretation elements and interactive apps designed to provide commentary on the military history of the site. A visitor orientation area (Classes 1, 2, 3 and 10) is also proposed at the northern part of the technical area and this would include the conversion of a Category B Listed guardhouse and Category C Listed Fire Station. The submission advises that this would be an arrival area including site information and possible museum café/shop, whilst the Crail Community Council/Museum are also hoping to utilise the former fire station as an archive building. An events area (Classes 1, 3, 7, 9, 10 and 11) is also proposed at the south-eastern part of the site and this would include the conversion of a Category A Listed Control Tower and Category B Listed Photographic Building. This area is envisioned as being a flexible external events area, including possible café, interpretation areas, office space and viewing deck within the control tower. The area at the western part of the technical area includes unlisted and Category B and C Listed buildings including a Main Office Building, Squadron Office Building and Sick Bay Building. This area would be converted to affordable short-term accommodation for seasonal workers, alongside smaller mixed-use buildings (Classes 1, 2, 3, 4, 9, 10 and 11). The southern part of the site which is mostly hardstanding would be converted to a car park area and potential motor home park.

1.2.7 A phasing plan has also been submitted in relation to the overall Masterplan and this advises that the site would be developed in three phases over an approximately 10 plus year period to realise the masterplan vision in a commercially viable manner. Phase one of the development would include the strategic spine of development/circulation across the site, supported by direct links to the surrounding core path network. Phase one would include the following:

- Site access/infrastructure across the site.
- A parkland area at the south-east corner of the technical area.
- The provision of a market hall on the eastern part of the accommodation area. This would involve the conversion of the category B Listed gymnasium/cinema building.
- Erection of 30 holiday accommodation units on the east side of the accommodation area.
- Accommodation blocks.
- Visitor orientation centre including the conversion of a Category B Listed guardhouse and Category C Listed Fire Station at the northern part of the technical area.
- Affordable seasonal accommodation/mixed-use area at the western part of the technical area. This would include the conversion of Category B and C Listed buildings.
- Mobile holiday home area and car park area at the southern part of technical area.
- The events area at the south-eastern part of the technical area including the conversion of the Category A listed control tower.

1.2.8 The submission advises that phase two reinforces the public uses across the site by supporting the provision of additional accommodation and this would include further site infrastructure, tree belt landscaping and the following:

- Erection of 28 holiday accommodation units at the northern and central part of the accommodation area.
- The proposed Crail Airfield open air museum area and the central public park area at the northern and central part of the technical area. This would include the conversion Category B and C Listed buildings including the torpedo workshop building and aircraft painting hangar building.

1.2.9 Phase three would complete the remainder of development including soft landscaping, further site infrastructure and the following:

- Erection of 33 holiday units on the western part of the accommodation area.
- Hotel on the eastern part of the technical area. This would include the conversion of the Category A Listed engine and aircraft repair shop building.
- The parkland area which would be on the southern part of the accommodation area.
- The craft/light industrial area which would include the erection of 6 buildings and conversion of four Category B Listed storage sheds at the eastern part of the technical area.

1.3 Relevant Planning History

00/00300/EFULL - Change of use of part of former airfield to form temporary caravan site (200 caravans) from 14 July to 25 July 2000 – APPROVED UNCONDITIONALLY - 04/05/00

01/01414/EFULL - Extension to outdoor events area for traffic management purposes (including alternative vehicular access point - APPROVED WITH CONDITIONS - 26/11/01

03/00429/EFULL - Vary condition 6 on consent reference 99/01144/EFULL (operating times of car boot sale) - REFUSED - 05/06/03

04/00308/EFULL - Variation of Conditions 5 and 6 (99/01144/EFULL) - car boot sales operating days and opening hours - REFUSED - 28/04/04

04/01201/EFULL - Extension to outdoor events area for traffic management purposes (including alternative vehicular access point for vehicle events - car boot sales) - APPROVED WITH CONDITIONS - 01/06/04

04/03764/EFULL - Use of land for outdoor market (car boot sale) and siting of portable toilet block - APPROVED WITH CONDITIONS - 21/01/05

05/00050/ECLP - Certificate of Proposed Lawfulness for the temporary use of the site - APPROVED WITH CONDITIONS - 06/10/05

98/00030/EOPP - Outline Planning Permission for Mixed Development- Commercial/Recreational/Residential/Health Care - WITHDRAWN - 02/02/01

99/01144/EFULL - Renewal of temporary consent reference number 08/95/0091D for outdoor events area until 31 December 2004 - APPROVED WITH CONDITIONS - 10/10/00

05/00900/EFULL - Temporary planning permission for formation of camping site 1st July - 25th July 2005. (vary term of condition 4 of 04/03764/EFULL re - other events held at same time as car boot sale) - APPROVED WITH CONDITIONS - 13/05/05

07/00391/EFULL - Use of land for outdoor market (car boot sales) and siting of portable toilet block - vary condition 1 of 04/03764/EFULL - APPROVED WITH CONDITIONS - 05/06/07

09/01840/EFULL - Vary Condition 1 (07/00391/EFULL) for use of land for outdoor market (car boot sales) and siting of portable toilet block - APPROVED WITH CONDITIONS - 29/01/10

10/00498/FULL - Renewal of temporary planning permission (05/00900/EFULL) for formation of camping site 1st July - 31st July 2010 - APPROVED WITH CONDITIONS - 14/05/10

12/02877/PAN - Application to vary condition 1 of planning permission 09/01840/EFULL to extend temporary permission for further 3 years – PROPOSAL OF APPLICATION NOTICE AGREED - 01/08/12

12/04551/FULL - Amendment to Condition 1 of Planning Permission 09/01840/EFULL, extension in time for a further 3-year period for the use of land for outdoor market (car boot sales) and siting of portable toilet block. - APPROVED WITH CONDITIONS - 04/03/13

15/02697/PAN - Proposal of Application Notice for the use of land and buildings at Crail Airfield for motor vehicle events and other activities including the placing of moveable structures for more than 28 days in the calendar year (for a temporary period) – PROPOSAL OF APPLICATION NOTICE AGREED - 10/08/15

15/03394/FULL - Use of land for outdoor market (car boot sales) and siting of portable toilet block (Section 42 application for non-compliance with Condition 1 of planning permission 12/04551/FULL to extend planning permission for a further 3 years) - APPROVED WITH CONDITIONS - 11/12/15

15/03736/SCR - Screening opinion for use of land and buildings for motor vehicle events and other activities including the placing of moveable structures for more than 28 days in the calendar year (for a temporary period) – ENVIRONMENTAL IMPACT ASSESSMENT NOT REQUIRED - 10/12/15

15/03755/FULL - Planning Permission for the Use of Land and Buildings at Crail Airfield, Balcomie Road, Crail, for Motor Vehicle Events and Other Activities including the Placing of Moveable Structures for More than 28 Days in the Calendar Year (For a Temporary Period) - WITHDRAWN - 15/03/16

18/02359/FULL - Use of land for outdoor market (car boot sales) and siting of portable toilet block (Section 42 application for non-compliance with Condition 1 of planning permission 15/03394/FULL to extend planning permission for a further 3 years) - APPROVED WITH CONDITIONS - 19/12/18

21/03495/FULL - Use of land for outdoor market (car boot sales) and siting of portable toilet block (Section 42 application for non-compliance with Condition 1 of planning permission 18/02359/FULL to extend planning permission for a further 3 years) - APPROVED WITH CONDITIONS - 27/01/22

23/00558/PAN - Proposal of application notice for the regeneration and conversion of Crail airfield to form a mixed-use development including public event space, Use Classes 4 (light industry), 5 (general industrial) and 6 (Storage or Distribution), open-air museum, hotel (Class 7), holiday accommodation units, retail (Class 1) and ancillary infrastructure – PROPOSAL OF APPLICATION NOTICE AGREED - 17/03/23

23/01696/SCR - EIA Screening for mixed use development including leisure, tourism and commercial uses with associated infrastructure - ENVIRONMENTAL IMPACT ASSESSMENT NOT REQUIRED - 06/07/23

23/02015/FULL - Formation of wetland and associated engineering and groundwork operations - APPROVED WITH CONDITIONS - 06/10/23

24/01035/FULL - Change of use from former military cinema/gym (Class 11) to mixed use events space (sui generis) with cafe (Class 3) and offices (Class 4) and external alterations including extension to rear and installation of rooflights, re-roofing/rendering and rainwater goods, new windows/doors and air source heat pump with associated landscaping (including part demolition), formation of car parking/access works and outdoor seating/play area – PENDING CONSIDERATION

24/01034/LBC - Listed building consent for internal and external alterations including extension to rear, installation of rooflights, rainwater goods, new windows and doors (blocking up in part) and re-roofing and rendering (part demolition) – PENDING CONSIDERATION

1.4 Application Procedures

1.4.1 Under Section 25 of the Town and Country Planning (Scotland) Act 1997, the determination of the application is to be made in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan comprises of National Planning Framework 4 (2023) and FIFEplan Local Development Plan (2017). Under Section 59(1) of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997, in determining the application the planning authority should have special regard to the desirability of preserving a Listed Building or its setting or any features of special architectural or historic interest which it possesses.

1.4.2 National Planning Framework 4 (NPF4) was formally adopted on the 13th of February 2023 and is now part of the statutory Development Plan. NPF4 provides the national planning policy context for the assessment of all planning applications. As per Section 24 (3) of the Town and Country Planning (Scotland) Act 1997 (as amended) where there is any incompatibility between a provision of the National Planning Framework and a provision of a Local Development Plan, whichever of them is the later in date is to prevail. The Chief Planner's Letter dated 8th February 2023 also advises that provisions that are contradictory or in conflict would be likely to be considered incompatible.

1.4.3 This application constitutes a major development as per Class 9 (Other Development) of the Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009 as the site area exceeds 2 hectares. The applicant has carried out the required pre-application consultation (ref: 23/00558/PAN) and a Pre-Application Consultation Report (Online Plan Reference: 40) outlining comments made by the public has been submitted as part of this application. The manner of the consultation exercise, including the notification and media advertisement process, complied with the relevant legislation.

1.4.4 The proposal would fall under Class 12 (Tourism and Leisure) (c) of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 and would have a site area which is more than 0.5 hectares. The proposal could, therefore, have an impact that would necessitate the need for an Environmental Impact Assessment (EIA) Screening. A formal screening opinion application (23/01696/SCR) was made on 20th June 2023 and this Planning Authority determined on 6th July 2023 that an EIA was not required for this proposal. The screening opinion advises that an EIA is not required in this instance when taking into account the characteristics of the development, the environmental sensitivity of its location, the characteristics of its potential impact and the relevant EIA screening criteria. It should be noted, however, that this does not negate the requirement to fully assess the potential environmental impacts of the proposal through this planning application and several reports carried out by professional consultants have been submitted alongside this application. These include a landscape and visual appraisal, an ecological report, a preliminary environment risk assessment report, a flood risk assessment and a drainage strategy report.

1.4.5 A physical site visit was undertaken for this application on 1st October 2023. All other necessary information has been collated digitally and drone footage was produced in December 2023 to allow the full consideration and assessment of the proposal.

1.4.6 This application was advertised in The Courier newspaper on 16th May 2024 and 21st September 2024 and all neighbours within 20 metres of the application site were sent a neighbour notification letter on 15th September 2023 and were re-notified on 30th April 2024.

1.5 Relevant Policies

National Planning Framework 4 (2023)

Policy 1: Tackling the climate and nature crises

To encourage, promote and facilitate development that addresses the global climate emergency and nature crisis.

Policy 2: Climate mitigation and adaptation

To encourage, promote and facilitate development that minimises emissions and adapts to the current and future impacts of climate change.

Policy 3: Biodiversity

To protect biodiversity, reverse biodiversity loss, deliver positive effects from development and strengthen nature networks.

Policy 4: Natural places

To protect, restore and enhance natural assets making best use of nature-based solutions.

Policy 5: Soils

To protect carbon-rich soils, restore peatlands and minimise disturbance to soils from development.

Policy 6: Forestry, woodland and trees

To protect and expand forests, woodland and trees.

Policy 9: Brownfield, Vacant and derelict land and empty buildings

To encourage, promote and facilitate the reuse of brownfield, vacant and derelict land and empty buildings, and to help reduce the need for greenfield development. This policy also covers matters relating to contaminated and unstable land.

Policy 12: Zero Waste

To encourage, promote and facilitate development that is consistent with the waste hierarchy.

Policy 13: Sustainable transport

To encourage, promote and facilitate developments that prioritise walking, wheeling, cycling and public transport for everyday travel and reduce the need to travel unsustainably.

Policy 14: Design, quality and place

To encourage, promote and facilitate well designed development that makes successful places by taking a design-led approach and applying the Place Principle.

Policy 15: Local Living and 20-minute neighbourhoods

To encourage, promote and facilitate the application of the Place Principle and create connected and compact neighbourhoods where people can meet the majority of their daily needs within a reasonable distance of their home, preferably by walking, wheeling or cycling or using sustainable transport options.

Policy 18: Infrastructure first

To encourage, promote and facilitate an infrastructure first approach to land use planning, which puts infrastructure considerations at the heart of placemaking.

Policy 19: Heat and cooling

To encourage, promote and facilitate development that supports decarbonised solutions to heat and cooling demand and ensure adaptation to more extreme temperatures.

Policy 20: Blue and green infrastructure

To protect and enhance blue and green infrastructure and their networks.

Policy 22: Flood risk and water management

To strengthen resilience to flood risk by promoting avoidance as a first principle and reducing the vulnerability of existing and future development to flooding.

Policy 23: Health and safety

To protect people and places from environmental harm, mitigate risks arising from safety hazards and encourage, promote and facilitate development that improves health and wellbeing.

Policy 25: Community wealth building

To encourage, promote and facilitate a new strategic approach to economic development that also provides a practical model for building a wellbeing economy at local, regional and national levels.

Policy 26: Business and industry

To encourage, promote and facilitate business and industry uses and to enable alternative ways of working such as home working, live-work units and micro-businesses.

Policy 27: City, town, local and commercial centres

To encourage, promote and facilitate development in our city and town centres, recognising they are a national asset. This will be achieved by applying the Town Centre First approach to help centres adapt positively to long-term economic, environmental and societal changes, and by encouraging town centre living.

Policy 28: Retail

To encourage, promote and facilitate retail investment to the most sustainable locations that are most accessible by a range of sustainable transport modes.

Policy 29: Rural development

To encourage rural economic activity, innovation and diversification whilst ensuring that the distinctive character of the rural area and the service function of small towns, natural assets and cultural heritage are safeguarded and enhanced.

Policy 30: Tourism

To encourage, promote and facilitate sustainable tourism development which benefits local people, is consistent with our net zero and nature commitments, and inspires people to visit Scotland.

Adopted FIFEplan (2017)

Policy 1: Development Principles

Development proposals will be supported if they conform to relevant Development Plan policies and proposals and address their individual and cumulative impacts.

Policy 3: Infrastructure and Services

Outcomes: New development is accompanied, on a proportionate basis, by the site and community infrastructure necessary as a result of the development so that communities function sustainably without creating an unreasonable impact on the public purse or existing services.

Policy 4: Planning Obligations

Outcomes: New development provides for additional capacity or improvements in existing infrastructure to avoid a net loss in infrastructure capacity.

Policy 6: Town Centres First

Outcome: Thriving town centres in Fife which are hubs of activity in the local community and act as a focus for commercial, leisure, and cultural services.

Policy 7: Development in the Countryside

Outcome: A rural environment and economy which has prosperous and sustainable communities and businesses whilst protecting and enhancing environmental quality.

Policy 10: Amenity

Outcome: Places in which people feel their environment offers them a good quality of life.

Policy 11: Low Carbon Fife

Outcome: Fife Council contributes to the Climate Change (Scotland) Act 2009 target of reducing greenhouse gas emissions by at least 80% by 2050. Energy resources are harnessed in appropriate locations and in a manner where the environmental and cumulative impacts are within acceptable limits.

Policy 12: Flooding and the Water Environment

Outcome: Flood risk and surface drainage is managed to avoid or reduce the potential for surface water flooding. The functional floodplain is safeguarded. The quality of the water environment is improved.

Policy 13: Natural Environment and Access

Outcomes: Fife's environmental assets are maintained and enhanced; Green networks are developed across Fife; Biodiversity in the wider environment is enhanced and pressure on ecosystems reduced enabling them to more easily respond to change; Fife's natural environment is enjoyed by residents and visitors.

Policy 14: Built and Historic Environment

Outcomes: Better quality places across Fife from new, good quality development and in which environmental assets are maintained, and Fife's built and cultural heritage contributes to the environment enjoyed by residents and visitors.

National Guidance and Legislation

The Historic Environment Scotland Policy Statement (2019)

This document advises that development proposals involving Listed Buildings should have high standards of design and should maintain their visual setting.

Historic Environment Scotland's Managing Change in the Historic Environment's Guidance Note on Setting

This guidance note provide advice on development that affects the setting of the Historic Environment.

PAN 1/2011: Planning and Noise

This PAN provides advice on the role of the planning system in helping to prevent and limit the adverse effects of noise. It also advises that Environmental Health Officers should be involved at an early stage in development proposals which are likely to have significant adverse noise impacts or be affected by existing noisy developments.

Circular 3/2012: Planning Obligations and Good Neighbour Agreements

This circular requires that planning obligations meet all the five tests as set out in paragraphs 14-25 of the circular. A planning obligation should be necessary to make the proposed development acceptable in planning terms; serve a planning purpose and where it is possible to identify infrastructure provision requirements in advance, should relate to development plans; relate to the proposed development either as a direct consequence of the development or arising from the cumulative impact of development in the area; fairly and reasonably relate in scale and kind to the proposed development and be reasonable in all other respects.

The Scottish Government's Policy on Control of Woodland Removal

This guidance provides policy direction for decisions on woodland removal in Scotland.

Supplementary Guidance

Supplementary Guidance: Low Carbon Fife Supplementary Planning Guidance (2019) provides guidance on assessing low carbon energy applications; demonstrating compliance with CO2 emissions reduction targets and district heating requirements and requirements for air quality assessments.

Supplementary Guidance: Making Fife's Places (2018)

Making Fife's Places Supplementary Guidance sets out Fife Council's expectations for the design of development in Fife.

Planning Policy Guidance

Planning Policy Guidance: Development and Noise (2021)

Policy for Development and Noise looks at both noisy and noise sensitive land. Noise sensitive developments may need to incorporate mitigation measures through design, layout, construction or physical noise barriers to achieve acceptable acoustic conditions.

Planning Policy Guidance: Planning Obligations (2017)

Planning Obligations guidance seeks to ensure that new development addresses any impacts it creates on roads, schools and community facilities. It assists the development industry to better understand the costs and requirements that will be sought by Fife Council and provides certainty to communities and public bodies that new development will have no negative impact.

Planning Customer Guidelines

Fife Council's Minimum Distance between Windows Guidance (2011)

This guidance advises that there should be a minimum of 18 metres distance between windows that directly face each other, however, this distance reduces where the windows are at an angle to each other.

Fife Council's Planning Customer Guidelines on Daylight and Sunlight (2018)

This guidance sets out that unacceptable impacts on light to nearby properties should be minimised and preferably avoided.

Other Relevant Guidance

The Landscape Institute's Guidelines for Landscape and Visual Impact Assessment (3rd Edition, 2013)

This guidance provides advice on how to carry out a landscape and visual impact assessment.

2.0 Assessment

2.1 Relevant Matters

The matters to be assessed against the development plan and other material considerations are:

- **Principle of Development**
- **Transportation/Road Safety**
- **Sustainable Transport and the Location of the Development**
- **Landscape and Visual Impact including Impact on setting of adjacent Listed Buildings, Scheduled Ancient Monument and Crail Conservation Area**
- **Community and Economic Benefits**
- **Amenity Impact**
- **Water/Drainage/Flood Risk**
- **Natural Heritage including impact on Trees, Protected Species and Wildlife Habitats and Biodiversity Enhancement**
 - **Impact on Firth of Forth SPA and SSSI and the Outer Firth of Forth and St Andrews Bay Complex SPA**
- **Archaeological Impact**
- **Tackling the Climate and Nature Crises**
- **Contaminated Land**
- **Air Quality**
- **Core Paths/Rights of Way**
- **Waste Management**

2.2 Principle of Development

2.2.1 Policies 1, 9, 29 and 30 of NPF4 and Policies 1 and 7 of the LDP apply.

2.2.2 The site is allocated as a development opportunity site (LWD022) within the LDP with a description of 'other development'. This allocation includes the application site and the former airfield area to the south of the site and has an overall site area of 145.6 hectares. The allocation requires that developers prepare a development brief and undertake community consultation for Fife Council approval. The allocation also sets out the types of development which could be acceptable and advises that this may include the continuation of some outdoor events; existing and new employment uses; multi use commercial or leisure development and holiday accommodation; and proposals may also include limited housing development. The allocation further requires that development must relate sympathetically to the character of the site; must have regard to the amount, layout and type of built development which is likely to be acceptable; conservation or repair work should be carried out using appropriate materials to maintain building character and proposals should resolve site access issues from Crail to the airfield and Crail golf courses, whilst an alternative route will be required. The allocation also states that detailed proposals, including applications for planning permission in principle, must demonstrate that the development would not adversely affect the integrity of the Firth of Forth SPA either alone or in combination with other plans or projects.

2.2.3 The objections received state that there is no evidence to demonstrate any need for holiday homes and there is no demand for the development. They also state that the proposal is unsympathetic to the FIFEplan with only firm plans to build houses and that the LDP allocation of Crail Airfield is inappropriate for the geography of its location.

2.2.4 It should be noted that as per section 1.2.2 of this report, that the change of use of the existing buildings and alterations to the listed buildings on the site will require to be fully assessed under further applications for full planning permission and listed building consent. This report does comment on the overall acceptability, in principle, of the proposed land uses on the site as shown on the submitted masterplan, however, this planning permission in principle application, should it be approved, would only grant consent in principle, for the erection of the 91 holiday units, craft workshops/light industrial units (Class 4), storage buildings (Class 6) and associated infrastructure including footpaths, cycle paths, roads and parking areas. Any future proposals to significantly alter or demolish a listed building would require an application for listed building consent and this PPP application cannot grant consent to alter a listed building. Further dialogue would also take place with Historic Environment Scotland (HES) regarding these matters once an application for listed building consent were received for any of the Listed Buildings. It should also be noted that HES were consulted on this application, and they have no objections and are supportive of this proposal.

2.2.5 The submission includes a Planning Statement which advises that the proposal presents an opportunity to regenerate a nationally significant decaying historical asset, which is also a longstanding vacant and brownfield site which sits in juxtaposition to its rural setting in the East Neuk of Fife. The Statement advises that the proposal seeks to provide serviced plots for holiday homes, leisure businesses, seasonal working accommodation, museum, hotel complex and light industrial units which will enhance the village of Crail and make it more sustainable for years to come. The Statement further advises that regenerating the airfield will safeguard its long-term future and finally, after 70 years, a sustainable management plan will be in place for future generations, whilst, the balance of low-density development, careful restoration of listed buildings, attractive and fun public attractions created through investment into the airfield will further integrate this local asset into the existing community. The Statement considers that the site gives the local community the physical space and development land to support and benefit the surrounding community and that it also seeks to respond to the rural context, whilst creating a unique environment with a sense of community and a vibrant leisure-based experience for all. The Planning Statement sets out what it considers to be the relevant planning policy framework and material considerations and concludes that the proposal would comply with the key Development Plan policies, whilst it considers that the overall proposal provides an opportunity to preserve part of UK's Wartime history, whilst creating a tourism-based destination which also brings the local community back to the site.

2.2.6 A management plan (MP) is also included within the submission, and this advises that whilst there will be some opportunities for the sale of individual holiday accommodation plots through the delivery of the masterplan. It is the overarching ambition to retain ownership of the majority of the airfield's common ground, landscape areas, business units and event space which will allow the site to continue to evolve and prosper over the longer term. The MP further advises that the applicant has formed Crail Airfield Ltd which will be responsible for the management of the airfield and its day-to-day operations. The MP states that the income derived from parts of the proposal will be reinvested in the airfield every year for maintenance of existing heritage/historic buildings and landscaped areas and together, with new projects to advance the airfield, this investment will aid the objective of becoming a leading leisure destination venue both locally and nationally. The MP also states that Crail Airfield Ltd would act as estate manager, ensuring future development of individual buildings and that areas comply with the development guidelines and the estate rules/business plan.

2.2.7 The LDP allocation requires that developers prepare a development brief and undertake community consultation for Fife Council approval. This submission includes a Masterplan for the northern and southern parts of the airfield which sets out the proposed uses on the site; a Design and Access statement which sets out the history of the site, site constraints, a project brief and vision statement; Design Guidelines for the new build holiday units and numerous plans which detail how the connectivity on site should work in terms of pedestrian/vehicular movement and also how the site should be developed. It is considered that these documents together represent a development brief for the site. Community consultation was also carried out by the developer on this proposed Masterplan, and it is, therefore, considered that this requirement of the LDP has been complied with.

2.2.8 The LDP allocation sets out the types of development which could be acceptable on the site and advises that this may include the continuation of some outdoor events; existing and new employment uses; multi use commercial or leisure development and holiday accommodation; and proposals may also include limited housing development. This proposal would include the provision of holiday accommodation and light industrial (Class 4) and storage buildings (Class 6) which would comply with the LDP allocation. The overall Masterplan also shows numerous uses on the overall site which include a hotel (Class 7), open air museum (Class 10), cafes (Class 3), retail uses (Class 1), parks, events areas, assembly and leisure (Class 11), financial, professional and other services (Class 2) and residential (Class 9). As mentioned earlier in this report separate further applications would be required for the change of use of the existing buildings to these use classes, however, the proposed masterplan for the site is considered to comply with the LDP allocation and would be acceptable in principle. It is considered therefore, that as the application site is allocated as a development opportunity site (LWD022) within the LDP and the proposed uses shown within the submitted Masterplan including leisure, tourism/holiday accommodation and commercial uses would comply with the specified allocated land uses, the proposed land uses for the site would be acceptable in principle.

2.2.9 This proposal would also mostly accord with the above policies relating to development in the countryside as contained within the LDP (Policies 1 and 7) as it would provide facilities for a tourism use which requires a countryside location and which would provide facilities for access to the countryside, however, the commercial employment uses (Classes 4 and 6) would not strictly comply with these LDP policies as they do not fully meet any of the acceptability criteria set out within these development within the countryside policies. The proposed land uses are, however, acceptable in principle as the site is allocated for this type of development. They would also comply with Policy 29 (Rural Development) of NPF4 as the proposal includes the reuse of redundant buildings and brownfield land which would also involve the potential appropriate re-use of historic environment assets which would help secure the future of these historic assets. Policy 30 (Tourism) of NPF4 also states that proposals for new or extended tourist facilities or accommodation, including caravan and camping sites, in locations identified in the LDP, will be supported. The current LDP identifies the site as suitable for a tourism use, therefore, the proposal would comply with this policy.

2.2.10 The proposal would also result in the redevelopment of a brownfield site including vacant and derelict land and the re-use of existing buildings which is supported by Policy 9 of NPF4, and this states that proposals that result in the sustainable reuse of brownfield land including vacant and derelict land and buildings, whether permanent or temporary, will be supported. Policy 9 of NPF4 does require that given the need to conserve embodied energy, demolition will be regarded as the least preferred options, therefore, any future application should also provide a full justification with regards to the demolition of the existing buildings, however, full planning permission would not be required in terms of the demolition of these buildings and it is considered that the demolition of the redundant unlisted buildings would be acceptable. The matters relating to sustainability and low carbon are also further assessed later in this report of

handling. The proposal would also secure the long-term future of several redundant listed buildings on the overall Crail Airfield site, with some of these listed buildings being included on the Buildings at Risk Register. The submitted phasing plan shows that several listed buildings on the site are to be brought into use during phases one and two of the development. This includes the category B Listed gymnasium/cinema building and guardhouse building and the Category C Listed Fire Station. Applications for full planning permission (24/01035/FULL) and listed building consent (24/01034/LBC) for the conversion of the Category B Listed Cinema/Gymnasium building are also currently being considered by this Planning Authority. Phase one of the development includes the provision of part of the holiday site (30 holiday units) and the submission advises that the submitted phasing ensures that the site would be developed in a financially viable manner. It is considered, therefore, that, the proposed new self-build holiday site would also help financially enable the conversion of the listed buildings on site. A condition is also recommended requiring that the development is carried out in accordance with the submitted phasing plan to ensure that these listed buildings are developed early on within the development as recommended within the submitted phasing plan.

2.2.11 The principle of this development for a holiday accommodation site, light industry (Class 4) and Storage Buildings (Class 6) on a site allocated for these uses which is on previously developed derelict land at Crail Airfield would, therefore, be acceptable in principle and would comply with the Development Plan in respect of the proposed land uses. It should also be noted, that as this is an application for Planning Permission in Principle, at this stage, the proposal requires simply to evidence that the proposed uses either already are, or could be made to be, compliant with the Development Plan, subject to conditions and greater detail on the final make-up of the proposal being submitted through further detailed applications including approval of matters specified by conditions (AMSC) applications. Further dialogue with statutory consultees would also take place at the detailed application stage. The impact criteria associated with these policies and the LDP allocation requirements including sustainability, visual impact, transportation/road safety, natural heritage, amenity and flooding and drainage impacts will be fully assessed throughout this report. As stated above, it is also considered that the proposed uses set out within the Masterplan would be acceptable in principle, however, the change of use of the numerous buildings on site would be dealt with through further applications for full planning permission and listed building consent. Conditions and a section 75 legal agreement are also recommended requiring that the holiday accommodation cannot be permanently occupied. This is to ensure that, for the avoidance of doubt, the units are not used as and do not become permanent dwellings through the unlawful permanent occupancy of the dwellings. The holiday accommodation units will also not fall under the definition of a caravan and a condition is also recommended regarding this matter. The proposal subject to conditions would, therefore, be acceptable in principle.

2.3 Transportation/Road Safety

2.3.1 Policies 13, 14, 15 and 30 of NPF4, Policies 1 and 3 of the LDP and Making Fife's Places Supplementary Guidance apply. The LDP allocation requires that proposals should resolve site access issues from Crail to the airfield and Crail golf courses, whilst an alternative route will be required. The allocation does not, however, specifically set out what the existing site access issues are with regards to accessing the airfield from Crail or where or what form an alternative route should take.

2.3.2 A Transport Assessment (TA) has been submitted in support of this application. The TA assesses the site in relation to the existing transport network for walking, cycling, public transport and motor vehicles and it assesses the potential impact of the proposal on the surrounding public road network in relation to road safety. The TA notes that vehicular access to the site would "make use of existing access points" from Balcomie Road. In terms of trips generated by the proposal and the capacity of the road network to accommodate this, the TA,

using the industry standard Trip Rate Information Computer System (TRICS) estimates the trip generation that would arise from the proposals. It has based this estimation on the overall proposal including 91 holiday lodges, a 50-room hotel, a museum/gallery, a cafe with 40 covers, craft/light industrial uses, a parkland area and seasonal accommodation. The TA advises that the total peak vehicle trip generation would be 27 vehicles in and 18 vehicles out during the weekday AM (0800 to 0900), 25 vehicles in and 31 out during the weekday PM (1700 to 1800) and 94 vehicles in and 98 vehicles out during the weekend. The all-day trip rate would be 885 vehicles on a weekday and 1359 vehicles over the weekend. Automatic Traffic Counters were also laid on Balcomie Road and on the golf course access road from Sunday 21st to Sunday 28th May inclusive. This shows that the existing peak weekday flow was 954 vehicles (480 northbound and 474 southbound on Wed 24th), whilst the existing peak all day flow was 1,274 northbound plus 1,399 southbound (2,673 vehicles total) on Sunday the 28th and this was as a result of a busy event ('Banzai' – a Japanese Car Event) being held on this day. These occasional events took place over 19 days in 2023. The all-day total usage (existing trips plus proposed) on an occasional airfield event day would be 4,032 vehicles and the TA advises that this would not exceed the capacity of the road network, however, it should be noted that this figure would only occur on occasional event days. The TA advises that no account has been made for sharing in the trip generation estimates, for example, someone visiting the parkland may well visit the café and a holiday maker is likely to visit the museum/gallery. It may also be that those who partake in the occasional airfield event days choose to stay on the holiday site or in the hotel and make use of the cafes, therefore, the trip totals represent a worst-case scenario as it assumes all trips to be wholly new.

2.3.3 The TA also assesses the impact on the principal junction at the A917 St Andrews Road/Marketgate North/A917 High Street mini roundabout using the ARCADY module of the industry standard computer modelling package. The ARCADY model predicts capacities, queues, delays and accident risk at roundabouts. The TA states that this junction presently operates satisfactorily, and that the findings of the TA demonstrate that the junction will continue to operate well within capacity with the addition of the proposal in all scenarios. The TA assesses the impact of the development on the surrounding road network including Balcomie Road, Marketgate North within Crail Village and the A917 St Andrews Road/Marketgate North/A917 High Street mini-roundabout junction. The TA concludes that the submitted information demonstrates that a link with the A917 north is not required to accommodate the projected Airfield development traffic as the development could be accommodated on the existing road network, whilst the trip generation associated with the proposal could be safely accommodated on the existing public road network with no traffic mitigation required.

2.3.4 The LDP allocation also requires that proposals should resolve site access issues from Crail to the airfield and Crail golf courses, whilst an alternative route will be required. The allocation does not, however, specifically set out what the existing site access issues are with regards to accessing the airfield from Crail and does not specifically state where the alternative route should be located. The agent was advised that this matter would require to be fully investigated, and a second access provided, if possible. The submission includes three options for providing an alternative route including option A which would be an extension to the U062 road from the north of the site to allow it to link into the northern part of the Crail airfield site. Option B would be a new road from the A917 junction to Crail Airfield north-west corner with option C being a route from Crail Airfield via the Crail North allocated site and the A917 distributor road. The submission advises that all three options have been investigated and it is not possible to provide an alternative route into the site due to numerous constraints including the loss of prime agricultural land with the areas to the west and north of the site being classed as Category 2 and 3.1 prime agricultural land and land ownership with the external fields being within third party ownership. After further discussions between the agent and Fife Council and in response to Fife Council's Transportation Development Management (TDM) team's comments, a detailed proposal was submitted in relation to option A.

2.3.5 Option A would be for the provision of a new road which would link the northern part of the site with the existing U062 road. Detailed drawings (Withdrawn Proposed Link Road Layout and Withdrawn Proposed U062 Upgrade Works) of this proposed link road were submitted, and these showed a new road cutting across the existing agricultural field to the north which would connect to the U062 road along with upgrade works to the U062. Two passing places were proposed on the existing U062 road with part of the road to be widened at a corner. The proposed upgrade works were all within the extent of the adopted road and did not enter third party land. No improvement works were proposed on the U062 to the east of the widened bend as there was no adopted verge and the land was in third party land ownership. There would, therefore, be approximately 550 metres without passing places with no intervisibility between the proposed passing place and proposed link road. TDM advised that this would result in the carriageway edges being overrun and damage to the adjacent private land with no opportunity for two vehicles to pass each other safely, which they did not consider to be acceptable. The provision of the alternative route onto the U062 was, therefore, not possible due to these constraints which did not allow the required upgrading of the U062. This part of the proposal was subsequently withdrawn as the U062 could not be sufficiently upgraded to comply with TDM's requirements.

2.3.6 The submission also includes options for proposed upgrade works to Balcomie Road and within Crail Village (Plan References: 71A and 72A). Option 1 shows a 2 metres wide footway on the east side of Balcomie Road with the carriageway being narrowed to 3.7 metres. Option 2 shows a 3 metres wide footway/cycleway on the west side of Balcomie Road with a carriageway width of 5.5 metres widening to 6 metres at several locations to allow two large vehicles to pass each other. The first option is within the extent of the adopted road, whilst the second option would include third party land either side of Balcomie Road. TDM advise that option 1 would not be acceptable, however, option 2 would provide an acceptable solution. Plan Reference 73A shows potential improvements to Marketgate North at the Denburn Narrows. This includes the provision of traffic signals, approximately 40 metres between the stop lines and a 2 metres wide footway on the west side. TDM advise that the proposed traffic signal control would not be acceptable, however, some form of proposal may be acceptable including widening the footway on the west side/narrow the carriageway (excluding opposite Kirk Wynd); retention of the southernmost give-way; and replacement of the northernmost give way (near Roomebay Avenue) with a give-way incorporating a raised table pedestrian crossing which would represent a minor improvement for pedestrians.

2.3.7 TDM has objected to the proposal and advise they accept that the development of the site has challenges to ensure compliance with Policy 13 of NPF4. TDM state that the provision of a second means of vehicular access via one of the three options considered by the applicant cannot be delivered due to technical challenges, primarily land ownership, which cannot be overcome. They also state that improvements to Balcomie Road (Option 2) are acceptable in principle and that the Denburn Narrows improvements has potential but requires to be developed further. They further consider that the lack of an alternative vehicle access is also not acceptable, however, they do accept that the provision of the second vehicular access is not possible as set out by the applicant. TDM also state that they are aware that their concerns may be set aside and have provided conditions which they consider could mitigate, as far as practically possible, their concerns set out above. TDM also advise that they accept that the applicant has considered alternative vehicular access options but it is clear that the LDP allocation requirement to provide an alternative route cannot be complied with, however, this would be a matter for the Case Officer to determine whether this requirement should be set aside or not. The proposed conditions include the widening of Balcomie Road, the provision of the proposed 3-metre-wide shared footway/cycle at the west side of Balcomie Road, the provision of a bus turning circle and bus stop either within the site or adjacent to Balcomie Road, the upgrading of Marketgate North (Denburn Narrows), details relating to public transport measures and conditions relating to parking and visibility splays.

2.3.8 Objections state that the lack of a second vehicular access is not acceptable, whilst the proposal offers no resolution to the issues of site access between Crail and the Airfield, therefore, the proposal would not comply with the LDP allocation in this regard. They also consider that the submitted TA is inaccurate as several use classes are omitted from it and that the TA advises that the road cannot accommodate a bus stop but the submitted Master Plan includes a bus stop area. The objections consider that TDM should rigorously interrogate the TA figures as there are serious concerns regarding this and there are also concerns regarding the use of Denburn Narrows as it is hazardous at the moment. They also state that even if there was a second road, traffic would still drive through Crail, and they consider that there is no capacity on the existing road network to absorb the increase in the traffic with any increase in traffic being detrimental to the surrounding area. The objections also state that the Crail Local Place Plan deals with a new access to Crail Airfield and this favours a new access from the A917 St Andrews Road via Crail North to Balcomie Road and that this is the only sensible solution. It should be noted, however, that the current Crail Local Place Plan has no statutory status and does not form part of the Development Plan. They also state that there is an opportunity to work with the owners/developers of the allocated Crail North site as this allocated site will require an access onto Balcomie Road which will have to be of a high specification, and this should require a contribution from the airfield development. The objectors also consider that the increase in traffic will result in congestion and there is no adequate parking in the centre of Crail. Objections also state that the access road is not currently wide enough to cope with the volume of two-way traffic and construction vehicles should also not be allowed through Crail. The objections also consider that the proposal does not comply with Policy 13 of NPF4 and is located within a cul-de-sac.

2.3.9 TDM's objections are noted and the matter relating to the sustainability of the location of the development will be fully assessed within the next section. TDM object to the lack of an alternative route as set out in the LDP allocation, however, they accept that this cannot be provided as set out by the applicant. Several objections also consider that a second access should be provided. Three different options were submitted by the applicant in terms of an alternative route into the site and the submission also includes reasons why each of these options cannot be provided and this includes land ownership issues, impacts on the setting of a listed building and the loss of prime agricultural land. It is accepted that the vehicle access route would result in the loss of prime agricultural land, and this could be contrary to Policies 7 of the LDP and 5 of NPF4 which relate to prime agricultural land. The proposed vehicular access road options shown within this submission would, therefore, result in the loss of prime agricultural land (either 2 or 3.1) and would also result in the subdivision of the existing land. Option A (connection to U062) could also potentially impact on the setting of a listed building to the north. A detailed proposal for Option A was submitted, however, this could not proceed due to land ownership issues with part of the road unable to be upgraded to comply with TDM's requirements. A significant number of objections were also received in relation to this proposed alternative route. It is accepted, therefore, that there are difficulties associated with providing a second access into the site and TDM have accepted that this cannot be provided by the applicant. The detailed proposals relating to Option A were subsequently withdrawn after it became apparent that an acceptable route at this location could not be provided. This Planning Authority has, throughout this application, discussed options to provide an alternative route, however, the applicant/agent have advised that this is not possible. A second access has not, therefore, been proposed. The main matter for consideration in this respect is, therefore, whether the existing access into the site can accommodate the proposal and whether it would also be considered acceptable for a single access to serve the proposal.

2.3.10 The submitted information advises that the existing road network which serves Crail Airfield can safely accommodate the traffic generated by the proposal. The TA demonstrates that the capacity of the road network is higher than the peak projected usage and that during the weekdays, for example, the total all day vehicular trip rate would equate to 1839 (new vehicular trips plus existing) trips which would be far lower than the existing trip rate which was

surveyed (2,673 vehicles total) on Sunday the 28th and was as a result of an occasional airfield event day. The weekend trips would also be well within the capacity of the existing roads and even on an occasional event day at the weekend, would still be within the capacity that the road network can safely accommodate (see sections above and submitted TA (Plan Reference 36)). Fife Council's TDM advise that they agree with the findings of the TA in relation to the vehicular trips generated and the capacity of the road network to accommodate this. The information submitted has demonstrated that there would be no significant impact on the surrounding area in terms of road safety and the submitted drawings also demonstrate an acceptable layout in terms of access and the provision of off-street parking on site. There is also capacity to accommodate the traffic generated by the proposal on the local road network. Indicative improvements are also proposed to Balcomie Road in terms of widening the road, the provision of an active travel route along this road and improvements to Marketgate North at the Denburn narrows. Fife Council's TDM has advised that these would be acceptable, however, further details regarding these matters should be submitted at the AMSC stage. Conditions, as suggested by TDM, are therefore, recommended regarding off-street parking, visibility splays and the other road improvements.

2.3.11 As mentioned earlier in this report, a 2-metre-wide footway next to Balcomie Road could be provided within the extents of the public road, as per option 1, however, the preferable option, would be option 2, which shows a 3 metres wide footway/cycleway on the west side of Balcomie Road with a carriageway width of 5.5 metres widening to 6 metres at several locations. This option would involve third party land, and the agent was contacted to ascertain whether they consider that they could provide these works. The agent has advised that their client confirms that they can comply with any recommended conditions requiring this road to be improved as per option 2 and the other suggested conditions relating to parking and visibility. It is considered, therefore, that as the proposal could be designed to comply with these road safety conditions that there would be no detrimental impact on the site or surrounding area in terms of road safety and the proposal would also provide an improvement in terms of connectivity and pedestrian safety between the site and Crail village. The proposed works would be outwith the extents of the application site boundary, however, it is considered reasonable in this instance, should this application prove acceptable, and as the agent has confirmed that their client can comply with a condition, to utilise a "Grampian" condition requiring that these matters are carried out in full within a strict timescale. Paragraph 37 of Planning Circular 4/1998: the use of conditions in planning permission advises that it could be ultra vires to attach a condition to a consent which would need the consent of a third party, however, it may be possible to achieve a similar result by a condition worded in a negative form, prohibiting development until a specified action has been taken. It further states that while an authority will continue to have regard to all relevant factors affecting a planning application and whether it should be granted with or without conditions, there is no longer a legal requirement to satisfy a reasonable prospects test in respect of any negative condition they may decide to impose. The confirmation from the applicant that they can comply with these recommended conditions does, however, show that there is a reasonable prospect of the condition being complied with. The negative aspect of the conditions will mean that the proposed holiday units cannot be occupied until Balcomie Road is improved.

2.3.12 The LDP allocation requires that an alternative route is provided, however, it is considered that the submission has demonstrated that the existing road network can safely accommodate the traffic generated by the proposal. The proposed improvements to the surrounding roads will also provide benefits in terms of pedestrian safety along Balcomie Road and within Crail village. The requirement to provide an alternative route into the site should, therefore, be set aside in this instance as the proposal would be acceptable in principle based on the submitted information. It would also result in the re-development of an allocated brownfield site which is on the Vacant and Derelict Land Register, the re-development of listed buildings which are on the Buildings at Risk Register, thus, ensuring their long-term future and would provide a significant economic benefit and community benefits to the site and

surrounding area (these matters are also assessed later on in this report). The proposal would, therefore, provide significant benefits to the site and surrounding area and has demonstrated that the proposal could be served by the Balcomie Road access. The LDP allocation also requires that proposals should resolve site access issues from Crail to the airfield and Crail golf courses, however, it does not specify what these site access issues are. The proposed improvements to Balcomie Road and the Marketgate North within Crail would help to resolve these aforementioned site access issues. These matters relating to road safety would also be further assessed at the AMSC stage once a detailed layout has been received and conditions relating to road safety matters are recommended. A condition relating to any proposed construction traffic route is also recommended. The proposal would, therefore, comply with the LDP allocation requirement to resolve site access issues into the site but would not comply with the requirement to provide an alternative route into the site. It is considered, however, the requirement to provide an alternative route should be set aside in this instance as per the reasoning set out above. The proposed development subject to conditions would, therefore, provide the required on-site transport measures to minimise and manage future levels of traffic generated by the proposal and would be acceptable in this instance.

2.4 Sustainable Transport and the Location of the Development

2.4.1 Policies 13, 14, 15 and 30 of NPF4, Policies 1 and 3 of FIFEplan and Making Fife's Places Supplementary Guidance (2018) apply.

2.4.2 This application relates to the disused Crail Airfield which is located outwith any settlement boundary and approximately 0.5 kilometres to the north of Crail Village. Access to the airfield is taken from Balcomie Road (C Class Distributor Road) which travels along the southern boundary of the site, and this begins at Crail to the south-west. A Core Path (P071/04 - Crail coast to Wormiston) runs past the south-western and western boundary, whilst a proposed future Core Path (PF52 – Crail to Crail Airfield) runs adjacent to the south-eastern boundary of the site. Balcomie Road is also part of the Core Path Network (P073/01 - Kilminning coast to Crail via Road).

2.4.3 TDM object to the proposal as set out in section 2.3.6 of this report and they consider that the proposal would not comply with Policy 13 of NPF4. They do note that there are challenges with the site to ensure compliance with this policy, however, they object as the absence of suitable measures to promote sustainable transport, and active travel is not acceptable.

2.4.4 Objections state that Crail is not well served by public transport, whilst there is a lack of amenities within Crail including shops. They also consider that walking and cycling will be deterred due to the distance between the village and site and the lack of a suitable connection. The objections also state that the proposal does not comply with Policy 13 of NPF4.

2.4.5 The submission advises that the closest, and only, existing bus service is the 95 St Andrews – Leven service. The closest bus stops (Bowling Green Place) are on the A917 which would be approximately 1,700 metres walking distance from the centre of the site, but the bus service does serve Pinkerton Road and Sauchope Crescent which would be approximately 1,000 metres walking distance from the centre of the site. It also advises that Balcomie Road is identified as a cycle route (R071 Crail to Wormiston and R073 Kilminning coast to Crail) and the route is on road with Balcomie Road deemed a “quiet access road” suitable for walking, cycling and pushchair. There are also core paths on the western boundary of the site and the centre of the site is located approximately 1,600 metres walking/cycling distance from the A917/Marketgate junction in the centre of Crail. There is a narrow footway on one side of Balcomie Road, north of the 20mph speed limit (initially on the east side then the west side) which is in poor condition. The TA further states that there are no cyclist facilities and within the

settlement boundary of Crail there are narrow footways on both sides of the Balcomie Road carriageway, but on Marketgate through the Denburn Narrows this reduces to a narrow footway on the west side of the carriageway only.

2.4.6 The indicative submission shows that the proposal would be provided with a network of walking, wheeling, and cycling routes within the site with a 3-metre-wide active travel route to be provided alongside Balcomie Road and this road would also be widened. These paths would connect to the core paths located to the south and west of the site and the cycleway located to the west of the site. The proposal would also include a bus stop, drop off area and turning circle and the agent has submitted evidence to show that they have contacted the bus service operator regarding this matter and will be seeking further discussions regarding this. The proposal also advises that as this is a leisure-based development there is scope for a private shuttle service to be provided to assist in enhancing the connectivity between the site and the village. This service could also potentially provide travel to St Andrews to the north of the site. Improvements are also proposed at the Marketgate North at the Denburn Narrows which could help improve pedestrian safety within the village. Conditions are recommended requiring that the detailed matters relating to the above are submitted at the AMSC stage, whilst conditions are also recommended with regards to the proposed road improvement works.

2.4.7 The proposal at this location could increase the reliance on the private car, which may not strictly comply with Policy 13 (e) of NPF4 which states that proposals for significant travel generating uses will not be supported in locations which would increase reliance on the private car, taking into account the specific characteristics of the area. However, the site is allocated for development, would bring about the redevelopment of previously developed derelict land and would also result in the re-use of redundant listed buildings, thus securing their long-term future. The proposal would also provide an economic and community benefit to the site and surrounding area. Weighing up these factors, it is considered, that the proposed uses at this location would be acceptable in principle. The location of this proposal would, therefore, be acceptable as there is significant policy support for the re-development of this site which is allocated for this type of development within the LDP. Policy 13 of NPF4 also states that proposals to improve, enhance or provide active travel infrastructure, public transport infrastructure or multi-modal hubs will be supported, whilst proposals will also be supported where they provide direct, easy, segregated and safe links to local facilities via walking, wheeling and cycling networks before occupation; will be accessible by public transport, ideally supporting the use of existing services and supply safe, secure and convenient cycle parking to meet the needs of users. The proposed provision of a bus stop within the site, a private shuttle service between the site and Crail and potentially St Andrews, walking, wheeling, and cycling routes which connect to existing core paths/cycleways and the proposed provision of an active travel route at Balcomie Road to Crail along with some minor improvement in terms of pedestrian safety within Crail Village would result in an overall improvement in terms of connectivity and pedestrian safety between the site, Crail village and the surrounding area and these improvements would meet the requirements of Policy 13 of NPF4. Conditions are recommended regarding these matters and these matters would be further assessed at the AMSC stage once a detailed proposal has been received. The proposal subject to conditions would, therefore, be acceptable in principle at this location.

2.5 Landscape and Visual Impact including Impact on setting of adjacent Listed Buildings, Scheduled Ancient Monument and Crail Conservation Area

2.5.1 The Historic Environment Scotland Policy Statement, Policies 4, 14, 29 and 30 of NPF4, Policies 1, 7, 10, 13 and 14 of the LDP, Making Fife's Places and Historic Environment Scotland's Managing Change in the Historic Environment's Guidance Note on Setting apply.

2.5.2 The LDP allocation requires that development must relate sympathetically to the character of the site and must have regard to the amount, layout and type of built development which is likely to be acceptable. It also states that a Development Brief must be submitted.

2.5.3 Specific detailed design aspects do not normally form part of an application for planning permission in principle, nor does it usually form part of the assessment of a PPP application as this matter would be fully assessed at the AMSC stage. Regulation 13 (Design and Access Statement (DAS)) of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 also sets out when a Design and Access Statement is required and regulation 13 (3) states that a DAS is not required for an application for planning permission in principle. Notwithstanding this, a Masterplan including an indicative site plan, and a Design and Access Statement have been submitted to demonstrate how the proposal could be accommodated within the site and surrounding area. An indicative site layout, Masterplan drawings and documents, a Design and Access Statement (DAS) and a Landscape and Visual Appraisal report (LVA) have, therefore, been submitted in support of this application. These documents taken together are considered to constitute a Development Brief for the site.

2.5.4 The proposed 91 holiday accommodation units would be located within the northern accommodation area of the site, and these units would be situated in uniform rows across the site. A conceptual drawing of this site has been included within the DAS. Landscaping in and around the proposed holiday site would include new tree belts and hedgerows and the existing roads would be utilised along with the formation of new internal access roads and footpaths/cycle paths. The existing unlisted buildings would be demolished to make way for the proposed holiday units. The proposal would also include a large parkland area to the south of this holiday site which would be open to the public. The proposed light industrial (Class 4) and storage and distribution (Class 6) buildings would be located within the eastern area of the southern Technical Area of the airfield. The submitted site plan shows six new buildings located within this area and the submission advises that these could be used by small local businesses such as offices, workshops, warehouse storage, small distilleries, pottery and carpentry. A series of paths and connections are also shown throughout the site, and these would connect to the surrounding core paths. A bus stop and turning area also proposed next to the existing gymnasium/cinema building within the accommodation area. Further details with regards to the proposed Masterplan layout for the site can be viewed under section 1.2 of this report.

2.5.5 The DAS sets out the history of Crail Airfield and includes a description of the existing site and surrounding area and provides an overall proposed Masterplan for the allocated site. The DAS advises that the purpose of the Masterplan is to provide a framework for the development of the former Crail Airfield as a mixed-use community that incorporates as many of the existing structures as possible while enhancing the site's ecological value. The DAS fully assesses the constraints associated with the site and includes various plans which demonstrate these constraints. The DAS also includes contextual drawings and visualisations which demonstrate how the proposals would sit on the site in relation to the surrounding area and adjacent buildings. The DAS states that the proposal highlights the historic value of all buildings and infrastructure on site, both listed and non-listed, as part of a wider strategy that aspires to enhance the site's physical connectivity with its surrounding communities and the ecological value of the land it occupies. The DAS advises that the masterplan layout creates a separate network of paths for pedestrians and cyclists connected to Local and National active travel routes, which allows residents and visitors to move freely through the site and discourages the use of cars. It also considers that the proposal would create a 'wildlife corridor' connecting Fife Ness Coast (Site of Special Scientific Interest) with the nearby woodlands. This green corridor is structured around several retained listed and non-listed military small buildings in the accommodation area that provide an anchor for the new road layout thus connecting the site with its military history.

2.5.6 The DAS advises that a low-density development is proposed within the northern accommodation area with 91 unique large self-service plots for holiday accommodation units which would be separated using 2-metre-wide planting boundaries. In addition to the plots, the proposed masterplan retains the most significant building in the Accommodation Area, the category B-listed former Gym/Cinema, as a Market Hall/Events Area offering a retail destination serving the local economy. Other non-listed structures dotted around the area offering a variety of cultural and leisure uses are also retained. The category C-listed former accommodation blocks will be re-purposed as short-term holiday accommodation units. The DAS states that in the southern technical area, most of the buildings are to be retained with the main design challenge finding strategies for their re-use and re-purpose. The submission has, therefore, subdivided the area into zones with suggested uses that seem viable and flexible enough to accommodate future change. These uses include an open-air museum, hotel, craft village, public green spaces, car parking, holiday homes and business incubators. The DAS advises that the submission also includes detailed but flexible design guidelines based on relevant local, national, and international examples of similar developments. The DAS considers that these guidelines will encourage innovative, high-quality, sustainable design and that the applicant will develop some of the sites identified in the masterplan for leisure and holiday accommodation if the application is approved which will set the standard for future developments.

2.5.7 A set of Design Guidelines (DG) have been submitted for the 91 holiday accommodation plots on the northern accommodation area of the site and these state that it is considered beneficial for a set of typical plot design guidelines to be incorporated within the PPP approval. The DG states that this will ensure that all future holiday home developments meet high levels of design quality, which are appropriate in terms of the historic airfield context and the ongoing global climate emergency. The applicant advises that these units would not meet the legal definition of a caravan as set out in the Caravan Sites and Control of Development Act 1960(as amended) and Caravan Act 1968, however a condition is proposed to ensure that this is the case to prevent the development of a caravan site. The DG sets out the potential massing of the properties and the proposed landscaping and hardstanding areas to be included within the plots. An indicative site layout is also included with the DG. The DG set out that an example plot area would be no more than 800 square metres with each plot including a 280 square metre development area with these areas being positioned equally between plot boundaries and the development area being positioned 8 metres back from the street frontage. The proposed holiday homes would have pitched roofs with eaves at a maximum of 3 metre above ground level and ridges at no more than 4.5 metres above ground level. The DG states that paved driveways would only be permitted up to a maximum 40% of the front garden area and a native species hedgerow would be planted where plots front onto access roads. The proposed landscaping would include a native woodland tree and shrub planting strip which frames each plot to the sides and rear, typically between 2-6m width.

2.5.8 With regards to landscape impact, the Landscape Institute and Institute for Environmental Management and Assessment document Guidelines for Landscape and Visual Impact Assessment (3rd Edition, 2013) states that for visual effects or impacts, the two principal criteria which determine significance are the scale and magnitude of effect, and the environmental sensitivity of the location or receptor. A higher level of significance is generally attached to large-scale effects and effects on sensitive or high-value receptors; thus, small effects on highly sensitive sites can be more important than large effects on less sensitive sites. The guidelines note that large-scale changes which introduce new, discordant or intrusive elements into a view are more likely to be significant than small changes or changes involving features already within the view. The document goes on to state that changes in views from recognised and important views or amenity routes are likely to be more significant than changes affecting other less important paths and roads.

2.5.9 An LVA has been submitted by the agent with regards to the proposal's landscape and visual effects. The LVA includes a zone of theoretical visibility (ZTV) which uses a study area of 2 kilometres from the site, photos taken from three viewpoints (Balcomie Road, Crail Settlement Edge and the Fife Coastal path at Roome Harbour) and photomontages showing a modelled visual impact of the proposal. The LVA states that the three viewpoints have been identified and selected as being representative of the range of visual receptors found within the study area. The proposed site has been subject to an LVA in the past, for which Brindley Associates also operated as the consultants. The LVA states that the three viewpoints utilised for the current assessment are the only viewpoints from the previous assessment which demonstrated likely visibility of the site.

2.5.10 The LVA grades each visual effect of the development from each viewpoint and advises that effects graded below moderate (including minor/moderate, moderate/minor, minor, minor/negligible, negligible) and none are not considered to be significant. The findings of the LVA state that from Balcomie Road (Viewpoint 1) the predicted effect of the development would be moderate/minor adverse during construction and moderate/minor positive during years 1 and 10 completion. The predicted effect from the Crail Settlement edge would be moderate adverse during construction and moderate positive during years 1 and 10. The predicted effect from the Fife Coastal Path at Roome Harbour would be Moderate/Minor adverse (recreational users) and minor adverse (road users) during construction, moderate/minor positive (recreational users) and Minor positive (road users) during years 1 and 10. The LVA concludes that visually, the proposal would result in almost exclusively positive effects upon visual receptors across the study area, given the removal of brownfield land and the considerable increase in tree cover resulting from the Landscape Mitigation Strategy. The LVA states that the only adverse effects identified are likely to be associated only with the construction phases of the proposal and would be of a temporary nature and limited duration.

2.5.11 Objections state that there is lack of information to assess the impact on listed buildings and that the proposal would not preserve and improve the listed buildings on the wider site. They also state that the proposal would have a detrimental impact on the setting of listed buildings, and they consider that it would be difficult to preserve the historic site if holiday plots are sold off to be developed by individual owners. It should be noted, however, that any individual owners would have to comply with the terms of any approved planning permission in principle and subsequent AMSC. The matter relating to the detail of the holiday units would, therefore, be fully assessed at the AMSC stage. The objectors also state there are issues with what is actually listed on the site, however, this is set out in the listing description of each building and the matter relating to curtilage listing has also been considered. The objections also consider that the proposal has not considered the impact on the neighbouring Conservation Area. They also state that the proposal would represent overdevelopment of the site, would not be in keeping with surrounding rural hamlets and the scale of the development is inappropriate for a small village. They also consider that the character of Crail and the surrounding area would be detrimentally altered.

2.5.12 Historic Environment Scotland advise that they are supportive of this proposal and consider that it would bring significant benefits to Fife's historic environment by reusing most of the listed buildings at Crail Airfield. They also advise that they realise that this application is for planning permission in principle, and they would be keen to be involved at the detail application stage for each listed building proposal.

2.5.13 Fife Council's Urban Design officer (UD) advises that the proposed Design Guidelines for the plots is welcomed in principle, but the current approach would foster an overly uniform style of building. They state that, for example, there is no reason to have all properties with a particular pitch of roof and the UD suggests that a high-quality contemporary style of design should be encouraged, fostering creativity, whilst there could be character areas, or areas

where height/massing may increase. They consider that the Design Guidelines should be revised to identify a more appropriate and relevant suite of principles to help secure a distinctive and contextually relevant development form/layout. These matters could be dealt with through conditions requiring that updated design guidelines are submitted with the first AMSC application.

2.5.14 The DAS demonstrates a clear understanding of the site and its historical context including the existing site conditions and constraints. The design philosophy has been clearly articulated and this provides an understanding of the architectural form and history of the Crail Airfield site and surrounding area in terms of the built and natural environment. Based on the current submitted information the proposal, subject to any potential identified mitigation measures in the form of planting and landscaping, could be sited at this location with no significant detrimental visual impact on the site or the surrounding historic environment assets. The overall impacts on the landscape character, in terms of the new proposed built development, would also appear to be generally localised and would have no further significant impact on the site or surrounding area when compared to the existing Crail Airfield buildings. It is considered that the proposal would in fact represent a positive visual change to the site and to the landscape at this location as it would represent the re-development of an existing brownfield site which would replace some existing redundant buildings, whilst, converting others and it would also include significant planting in and around the site which would help soften the overall impact of the development when compared to the existing situation. The proposal would also be viewed within the context of the existing and historic buildings within the airfield; therefore, the landscape impact and overall visual impact of the proposal would be acceptable in principle. The visual amenity issues (design and finishes), landscape impact and impact on the setting of the adjacent historic environment would, however, be fully considered as part of any future AMSC application and conditions are recommended which require the final design and details of all new buildings including finishing materials along with an updated LVA, DAS and Design Guidelines are submitted at the AMSC stage. The proposed change of use and alterations to the listed buildings on site would also be fully assessed under subsequent applications for full planning permission and listed building consent. Conditions are also recommended requiring that updated design guidelines are submitted with the first AMSC application.

2.5.15 The proposed indicative location and details of the holiday accommodation site and units, Class 4 and 6 buildings and associated infrastructure would, therefore, be acceptable in principle, in terms of visual impact, impact on setting of the listed buildings, the Crail Conservation Area, the adjacent Scheduled Monument and in terms of landscape impact. Whilst the design concept for the overall site is considered to be acceptable it should be noted that the matters relating to the specific design detail of new buildings, the alterations to listed buildings and change of use of these existing buildings would also be dealt with under separate applications for AMSC, full planning permission and listed building consent and the visual impact and impact on the historic character of these buildings would be fully assessed under each of these further separate applications. The proposal subject to conditions, would, therefore, comply with the Development Plan in this respect and would be acceptable in principle.

2.6 Community and Economic Benefits

2.6.1 Policies 29 and 30 of NPF4 apply.

2.6.2 An economic impact assessment (EIA) report has been submitted in support of this application. This advises that the report estimates the gross and then the net economic impact of the proposal by considering the likely direct, indirect and induced impacts of the

development, taking into account local and regional multipliers, leakage and displacement levels. This then provides impact figures in terms of quantifiable economic indicators (i.e. output, employment and Gross Value Added). The EIA advises that during the construction period the proposal could generate a net additional economic output of £27.6 million during years 1 to 6 and the proposal could create 300 gross full-time jobs during this period. The EIA also states that the operating economic impact of the proposal in the Fife Region would generate 254 gross full-time jobs per year from year 8 with an economic output per annum from year 8 of £13.1 million. The EIA concludes that the Crail Airfield development has the potential to generate significant economic impact when developed out as a result of construction spend; operation of accommodation space; operation of visitor space; operation of employment space; and the additional spending in the area created by new households and tourists.

2.6.3 The proposal would also represent a benefit to the community as a large parkland area is proposed within the site along with active travel routes which member of the community could make use of. Members of the community would also be able to make use of the other aspects of the proposal including the museum, cafe and events area, whilst the proposal could benefit Crail Village in terms of visitors to the Crail Airfield site making use of the facilities available within Crail Village.

2.6.4 Objections state that the proposed economic impact on neighbouring villages has not been fully considered, however, it should be noted that competition with any other businesses in Fife is not a material planning consideration and the submitted EIA sets out an economic assessment of the proposal. The submitted information has, therefore, demonstrated that the proposal would provide an economic and community benefit to Fife, and it is accepted that a development of this type would provide benefits to the site and surrounding area. The proposal would, therefore, comply with the Development Plan in this respect and would be acceptable in principle.

2.7 Amenity Impact

2.7.1 PAN (Planning Advice Note) 1/2011, Policies 23 and 30 of NPF4, Policies 1 and 10 of the LDP, Fife Council's Planning Customer Guidelines on Daylight and Sunlight, Fife Council's Minimum Distance between Windows Guidance and Fife Council's Policy for Development and Noise apply.

2.7.2 The site is located approximately 0.5 of a kilometre to the north of Crail Village and several residential dwellings are located adjacent to the south-west boundary of the application site including Kirklands Cottage, Seafield, Taobh Na Mara, Viewfield and Foulhoggar. Taobh Na Mara is located directly next to Balcomie Road with the other dwellings located 122 to 264 metres to the north-west of Balcomie Road. These dwellings are also located between approximately 113 and 335 metres to the south of the proposed holiday accommodation site which would be within the northern accommodation area. Wormiston House and Wormiston Farm are located approximately 592 metres to the north-west and approximately 407 metres to the north-east of the site. It should be noted that this section will only be assessing the amenity impacts of the proposed holiday accommodation site, craft workshops/light industrial (Class 4) buildings and storage buildings (Class 6). As per section 1.2.2 of this report, the change of use of the existing buildings on the site will be further assessed through further applications for full planning permission and listed building consent. This section does, however, comment on the acceptability of the overall Masterplan for the site.

2.7.3 Fife Council's Environmental Health Service has not responded to this application; however, they were consulted on a pre-application enquiry for the proposed Masterplan which matched that submitted under this current application and they offered no objections to the proposal.

2.7.4 Objections state that the proposal would result in a detrimental noise impact and that lighting would have a detrimental impact on neighbouring communities. They also consider that construction work would be disruptive. These matters are fully considered below.

2.7.5 Noise/Daylight Sunlight and Privacy Impacts

2.7.5.1 It is considered that the proposed holiday accommodation would be a fully compatible use with the surrounding area and would, therefore, have no significant detrimental noise impact on the site or surrounding area. A noise report is also not considered to be necessary to assess this type of development as it would be a compatible use with the surrounding area. The proposal would also have no significant impact on the daylight/sunlight levels or privacy levels of the surrounding area due to the distances involved and the fact that the proposal would replace existing buildings. The proposed holiday accommodation use would, therefore, have no significant impact on the amenity of the surrounding area and would comply with the Development Plan in this respect.

2.7.5.2 The proposed light industrial (Class 4) and storage (Class 6) buildings would be located on the eastern side of the application site approximately 978 metres to the east of the group of residential dwellings. A class 4 use is defined in the Town and Country Planning (Use Classes) (Scotland) Order 1997 (as amended) as an office, other than a use within class 2, for research and development of products or processes; or for any industrial process, whilst these uses are a use which can be carried on in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit. These proposed uses would also have no significant impact on the surrounding area due to the distances involved between residential properties and these buildings.

2.7.5.3 The submitted information also demonstrates that the proposed use classes shown within the submitted Masterplan for the whole application site would have no significant impact on the site or surrounding area. The matters relating to the change of use of each building would, however, be fully assessed under subsequent applications for full planning permission and these should each include sufficient information to fully assess these matters. The proposal would, therefore, be acceptable in principle and would comply with the Development Plan in this respect.

2.7.6 Light Pollution

2.7.6.1 It is considered that due to the location of the site and the distances involved that there would be no significant impact on any surrounding residential areas as a result of light pollution from the proposal. The proposed and existing planting and trees and the intervening land and buildings would also provide mitigation against this. Any proposed external lighting could, however, impact on nearby habitats and a condition is recommended requiring that details of any proposed associated external lighting scheme or confirmation that no external lighting will be used shall be submitted at the AMSC stage for further assessment. The proposed development subject to this condition would, therefore, be acceptable in principle and would comply with the Development Plan in this respect.

2.7.7 Construction Disturbance

2.7.7.1 It is considered that any construction disturbance caused as a result of the proposal would be temporary in nature and any developer should also work to the best practice contained in British Standard 5228: Part 1: 2009 "Noise and Vibration Control on Construction and Open Sites" and BRE Publication BR456 - February 2003 "Control of Dust from Construction and Demolition Activities". This is in order to mitigate the effects on sensitive premises/areas (i.e. neighbouring properties and road) of dust, noise and vibration in relation to construction works. It should also be noted that Public Protection can deal with any complaints should they arise, and they can control noise and the operating hours of a construction site by serving a notice under the Control of Pollution Act 1974. There would, therefore, be no significant impact on the surrounding area as a result of any associated construction works. A condition is, however, recommended requiring that a Construction Method Statement and Management Plan, including an Environmental Protection Plan and Scheme of Works are submitted at the AMSC stage. Conditions also require that details relating to the construction traffic route are submitted at the AMSC stage. The proposed development subject to conditions would, therefore, be acceptable in principle and would comply with the Development Plan in this respect.

2.8 Water/Drainage/Flood Risk

2.8.1 Policies 1, 2, 18, 20 and 22 of NPF4 and Policies 1 and 3 of the LDP apply.

2.8.2 A drainage strategy (DS) report has been submitted in support of this application and this relates to the whole Masterplan site area. The report sets out an indicative surface water management plan and drainage assessment. It states that foul sewerage from the development will be collected by a traditional gravity pipe network, with the medium-term aim of connecting to the existing publicly owned sewerage system adjacent to the wastewater treatment works. It further states that Scottish Water has advised that upgrade works will be required to the existing treatment works and that this process has been initiated and that the development would be connected to this system once upgrade works are completed. It further states that in the short-term, the foul water would receive primary treatment from a package treatment station and would be discharged to ground after receiving suitable treatment, with the aim of forming a connection to the upgraded publicly owned wastewater treatment works in the future. The submission further states that the proposal would connect to the public water supply network. In terms of surface water management, the DS advises that surface water run-off from areas of new external hardstanding will incorporate SUDS measures to treat and attenuate the surface water run-off to the agreed discharge limit with attenuation features tested for 1: 200-year rainfall events with an additional uplift of 40% for climate change resilience.

2.8.3 A flood risk assessment report has been submitted for the whole site. This states that the development would be at a low risk of flooding.

2.8.4 Objections state that no details have been submitted relating to whether a private or public sewer will be used, and they consider that the existing infrastructure such as water and sewage will not cope within the increase in demand.

2.8.5 Fife Council's Flooding, Shorelines and Harbours Team advise that they have no objections to the proposal. Scottish Water also advise that they have no objections. They further advise that there is currently sufficient capacity in the Glenfarg Water Treatment Works to service the development, however, there is no public Scottish Water, Waste Water infrastructure within the vicinity of this proposal.

2.8.6 An indicative surface water management plan including a drainage impact assessment report has been submitted which demonstrates that a surface water management and drainage solution could be accommodated on the site. It is considered, therefore, that the proposal has demonstrated that the site could incorporate measures to ensure that it would be served by adequate infrastructure and services to deal with surface water run-off, wastewater drainage and the provision of potable water. These matters would, however, be fully assessed at the AMSC stage and conditions are, therefore, recommended requiring that a fully detailed surface water management plan including Fife Council's SUDS certification documents and details of the proposed drainage scheme be submitted with any future AMSC application. These conditions or future conditions would also control the timing of the delivery of this infrastructure. The proposal subject to conditions would, therefore, be acceptable in principle and would comply with the Development Plan in this respect.

2.9 Natural Heritage including impact on Trees, Protected Species and Wildlife Habitats and Biodiversity Enhancement

2.9.1 Policies 3, 4 and 6 of NPF4, Policies 1 and 13 of the LDP and The Scottish Government's Policy on Control on Woodland Removal apply.

2.9.2 Trees

2.9.2.1 An arboricultural impact assessment (AIA) report and additional tree information along with a conceptual landscaping plan has been submitted in support of this application. The AIA includes a tree survey, constraints plan and sets out any required tree protection measures for trees to be retained. The AIA advises that the site extends to over approximately 48 hectares with the primary areas of existing tree cover located along the southern boundary of Balcomie Road and in a closely planted belt through the northern half of the site. The AIA further states that a total of twenty-five individual trees, six areas of woodland, and three groups of trees were recorded. The mature trees are located in the linear woodland on the southern side of Balcomie Road, whilst, trees and shrubs, smaller and some scrubby in nature, are also present in a recently planted woodland throughout the site. The AIA states that the surveyed trees are a mix of Ash, Hawthorn, Blackthorn, Rowan, Alder, Beech, Birch, Holly, Cypress, Cherry, Pine, Whitebeam, Sycamore and Willow. The surveyed trees range from young to mature in age and no trees, given the historic use of the site as an aerodrome, are found to be of a size and age whereby they can be classed as 'veteran.' The AIA advises that the tree sizes range from small to medium, with heights of up to 13 metres, maximum diametrical crown spreads of up to 12 metres and stem diameters of up to 720 millimetres. The AIA also advises that further detailed information will be required as the development progresses.

2.9.2.2 The proposed masterplan and submitted tree reports show that a number of trees would be removed to make way for the development. This would total approximately 1256 Category A trees, 112 Category B Trees, 14 Category C Trees and 2 Category U trees. The landscape layout proposals show the location and extent of new native planting, and this would include structural woodland planting covering an area of approximately 52,888 square metres with the planting of approximately 13,222 trees and the planting of approximately 744 individual trees. The submission advises that this represents approximately a 10:1 ratio of replacement tree planting to trees removed as a result of development and it also advises that that the arboricultural report states that thinning of the woodland areas at an intensity of 20% maximum, with an initial focus on removing dead, diseased, suppressed, and sub-dominant trees should be immediately undertaken which would effectively reduce the number of impacted trees to 1,005. The submission also advises that the trees to be lost, although surveyed to be in good condition, are still relatively young with the trees typically being between 6 to 10 meters in

height. The AIA considers that the significant increase in woodland and tree coverage following the planting proposals will offset the initial imbalance due to the loss of relative maturity and will quickly represent a significant meaningful ecological and landscape net gain to the local area.

2.9.2.3 Objections have been received to the loss of woodland.

2.9.2.4 Fife Council's Tree Officer (TO) initially requested further details with regards to the number of trees to be planted to determine whether this would be sufficient and acceptable to off-set the loss of the existing trees on site. This was subsequently submitted and the TO advises that this proposal, in contributing to the potential of Scotland as a holiday destination and so providing a potential economic benefit, would comply with the Scottish Government Policy on the Control of Woodland Removal, and with NPF4. The TO agrees with the methodology and findings of the submitted AIA and tree information and has no objections to the proposal, as they consider the mitigatory tree planting is more than sufficient to off-set the loss of the existing trees on site. They also consider that as the majority of trees to be removed are less than 6 metres in height, these are young and so likely have not yet established enough to provide significant environmental benefits that cannot be adequately met through replanting. They also advise that to ensure that newly planted woodlands can establish fully, any trees which die in the first 36 months after planting should be replaced.

2.9.2.5 The submitted indicative layout and tree information shows that the proposal would result in the loss of a number of trees on site. The proposed landscaping concept also shows a significant number of compensatory tree re-planting to off-set the loss of these trees. It is considered that due to the significant re-planting of a woodland area and trees on site that there would be no significant environmental impact as a result of the loss of the existing trees which are also young and not fully established. The proposed re-planting would also represent a biodiversity enhancement at this location. The Scottish Government's Policy on Control of Woodland Removal also provides criteria, whereby, woodland removal could be acceptable, and this includes where the change in use of the land would contribute significantly to Scotland as a tourist destination, to sustainable economic growth and to increasing the quality of Scotland's Woodland Cover. The proposal would comply with this acceptability criteria and Fife Council's TO is also in agreement with this and has no objections to the proposal. Conditions are recommended requiring that an updated AIA, including a tree protection plan are submitted with any future detailed AMSC application to allow this matter to be fully assessed at the AMSC stage. The proposal has, therefore, demonstrated that a development of this type could be located on this site with no unacceptable impact in terms of tree loss. The proposal subject to conditions would, therefore, be acceptable in principle and would comply with the Development Plan in this respect.

2.9.3 Protected Species and Wildlife Habitats

2.9.3.1 A preliminary ecological appraisal (PEA) has been submitted which includes a desk-based search and habitat and protected species surveys of the application site. The PEA advises that five notable and designated sites (Fife Ness Coast SSSI, Firth of Forth SPA, Outer Firth of Forth and St Andrews Bay Complex SPA, the Firth of Forth Ramsar site and an ancient woodland) lie within 2 kilometres of the site boundary, however, the PEA considers that there will not be any effect on these areas due to their distance from the proposal and the lack of structural or functional connectivity. The PEA also states that one non-statutory site is present within 2 kilometres of the site boundary and Kilminning Coast is an area overseen by the Scottish Wildlife Trust for the study and recording of migrant bird species. The PEA also states that it is not considered that there will be any effect on this area due to its distance from the proposal and lack of structural or functional connectivity. The PEA advises that habitats and

plant species recorded within the site boundary are widespread and common throughout the central belt and no further habitat assessment is currently recommended. In terms of protected species, the PEA advises that the existing buildings, tall ruderals, trees, woodland, and scrub within the site provide suitable nesting habitat for breeding birds. It also advises that the buildings provide suitable nesting habitat for barn owls and the site contains suitable foraging habitat, therefore, it is recommended that a barn owl survey is carried out by a suitably qualified ecologist prior to any works on the buildings. The PEA also provides recommendations with regards to artificial lighting and wildlife species, and it recommends that the lighting guidelines (ILP, 2018) are adhered to.

2.9.3.2 The collection of individual and groups of buildings may also provide suitable habitat for roosting bat species and a preliminary bat roost assessment has been submitted. The bat roost assessment sets out the details on the structure and condition of the buildings on site and the suitability of these buildings to support roosting bats. The assessment advises that the site comprises 60 individual buildings with a total of 20 individual buildings being assessed as offering 'moderate' bat roost potential with the remainder of the buildings offering 'negligible' bat roost suitability. No further bat survey work is required on the buildings offering 'negligible' suitability, however, further activity surveys, are recommended for the 20 buildings offering 'moderate' suitability to ascertain if roosting bats are present prior to any works taking place. A bat licence may then be required from NatureScot should a roost be identified. The assessment also advises that if works at the site do not commence and there has been no change in the land-use prior to 20th February 2024, then further surveys should be commissioned.

2.9.3.3 Objections state that the proposal would have a detrimental impact on natural habitat, wildlife and protected species and a negative impact on ecological management and greenspaces. They also state that the proposal will impede nature conservation and Fife Council's ability to meet biodiversity targets.

2.9.3.4 Fife Councils' Natural Heritage Officer (NHO) has no objections to the proposal and agrees with the findings contained within the PEA. They advise that the recommendations contained within the PEA including the pre-works ecological assessment should, however, be carried out in full. They also advise that the proposed wildlife corridor plan could be difficult to achieve in the current plan due to how narrow the proposed corridor is at several "pinch points". They consider that the outline landscape design goes some way to explain the corridor theory, but this landscape layout will require to be tightened up for the detailed design stage, with a more detailed design and planting specification, including a maintenance schedule. Conditions are recommended with regards to these matters and the matters recommended within the PEA.

2.9.3.5 It is considered that the submitted information demonstrates, in principle, that the site can be developed with no significant impact on protected species, wildlife habitats or birds. Conditions are recommended requiring that the recommendations contained within the PEA relating to protected species are carried out in full. This includes the required surveys for barn owls and bats and the matter relating to no construction works being carried out during the bird nesting season. A condition is also recommended with regards to lighting and requiring that an updated Ecological report and bat surveys are submitted with any future AMSC application should this be required. The proposal subject to conditions would, therefore, be acceptable in principle and would comply with the Development Plan in this respect.

2.9.4 Biodiversity Enhancement

2.9.4.1 A PEA, landscaping information and a biodiversity statement have been submitted in support of this application. The proposed landscaping concept shows a significant number of compensatory trees to be re-planted to off-set the loss of trees and this is further detailed above

in section 2.9.2 of this report. A biodiversity statement has also been submitted and sets out a description of the existing site and advises that the enhancement of biodiversity has been carefully considered within the masterplan proposals, with biodiversity enhancements measures to include the creation of a 'wildlife corridor' through the spine of both development areas, large public parkland areas for pedestrians and cyclists to enjoy, including grassland and native planting, rewilding areas/wildflower meadows at the north and east corners of the technical area, enabling these to be reclaimed as natural habitats/ecosystems for various species, Sustainable urban drainage system (SUDS) basin, wetlands and grassland at the south corner of the accommodation area and reed beds/basin within the technical area, green roofs where feasible and the use of soft landscaping features/buffer strips throughout the layout. The proposal also includes an indicative landscaping plan and planting schedule which includes the planting of a significant number of trees, marginal/aquatic planting, meadows and hedges.

2.9.4.2 As per the section above, the NHO states that they have no objections to the proposal and agree with the methodology and findings of the submitted reports. It is considered that the submitted information demonstrates that the site can be developed to provide a significant biodiversity enhancement at this location and conditions are recommended regarding these matters. The proposal subject to conditions would, therefore, be acceptable in principle and would comply with the Development Plan in this respect.

2.10 Impact on Firth of Forth SPA and SSSI and the Outer Firth of Forth and St Andrews Bay Complex SPA

2.10.1 Policies 3, 4 and 6 of NPF4 and Policies 1 and 13 of the LDP apply. The LDP allocation requires that detailed proposals, including applications for planning permission in principle, must demonstrate that the development would not adversely affect the integrity of the Firth of Forth SPA either alone or in combination with other plans or projects.

2.10.2 A habitat regulations appraisal (HRA) as required by the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) was carried out for this proposal. Under the Habitats Regulations, all competent authorities must consider whether any plan or project could affect a European site before it can be authorised or carried out. This includes considering whether it will have a 'likely significant effect' on a European site, and if so, they must carry out an 'appropriate assessment'. This process is known as HRA. The proposal has been assessed in this regard and it is not considered that the proposal either alone or in combination with any other plans or projects is likely to have a significant effect on the aforementioned protected sites.

2.10.3 The submitted PEA also advises that there are five notable and designated sites (Fife Ness Coast SSSI, Firth of Forth SPA, Outer Firth of Forth and St Andrews Bay Complex SPA, the Firth of Forth Ramsar site and an ancient woodland) that lie within 2 kilometres of the site boundary, however, the PEA considers that there will not be any effect on these areas due to their distance from the proposal and the lack of structural or functional connectivity. The NHO also agrees with the findings of the PEA and has no objections to the proposal. It is considered that, based on the submitted information, that the proposed re-development of the Crail Airfield site would have no significant impact on the Firth of Forth SPA and SSSI and the Outer Firth of Forth and St Andrews Bay Complex SPA. The proposal would, therefore, be acceptable in principle and would comply with the Development Plan in this respect.

2.11 Archaeological Impact

2.11.1 Policy 7 of NPF4 and Policies 1 and 14 of the LDP apply.

2.11.2 Fife Council's Archaeological officer (AO) advises that the site is an historic military airfield of considerable historic, architectural and archaeological significance, and stands on ground likely to contain buried archaeological deposits of prehistoric and medieval date. They consider that the proposal is based on a comprehensive understanding of the site's historical and architectural significance and for the most part, represents an informed approach to change at the historic airfield, however, the submission does not necessarily demonstrate an awareness of the site's pre-airfield, buried archaeological potential. The AO further advises that whilst not an impediment to development, the likely presence of buried archaeological deposits of prehistoric and medieval date on site will need factored into a pre-development mitigation plan. The AO has no objections to the proposal subject to conditions requiring that a programme of archaeological works are carried out in full before any works commence on site. Conditions are recommended regarding this matter. The proposal subject to this condition would, therefore, be acceptable in principle and would comply with the Development Plan in this respect.

2.12 Tackling the Climate and Nature Crises

2.12.1 Policies 1, 2 and 19 of NPF4, Policies 1 and 11 of the LDP and Fife Council's Low Carbon Fife Supplementary Guidance apply.

2.12.2 An Energy Statement of Intent (ESI) has been submitted in support of this application. The ESI sets out how the development is committed to sustainable objectives and targets and how the development will address carbon emissions in design. The ESI advises that the proposal will utilise as many renewable technologies as possible, so long as they are economically viable, and it states that the current design proposals are based on a strict 0% supply of gas generated energy and instead focuses on generating 100% of energy from electrical sources. The ESI then assesses the different renewable energy methods which could be utilised in the development including solar energy, air source heat pumps, biomass fuel and district heating. The ESI considers that this provides more opportunities to supply green energy which, in turn, will reduce the developments carbon footprint. The ESI also advises that a passive design approach will be taken which would reduce the need for energy consumption and increase energy efficiency. It then sets out recommendations with regards to this including building layout, building orientation, building form, building fabric and thermal mass.

2.12.3 Objections state that the proposal would have a huge carbon footprint.

2.12.4 It is considered that sufficient information has been submitted to demonstrate that the proposal could incorporate sufficient energy efficiency measures and energy generating technologies which would contribute towards the current carbon dioxide emissions reduction target. The application site is also located more than one kilometre from a district heating network; therefore, it does not have to investigate the feasibility of connecting to an existing or proposed district heat network. Conditions are also recommended requiring that an updated energy statement of intent along with full details of any energy generating technologies and measure are submitted at the AMSC stage. These matters would, therefore, be fully assessed at the AMSC stage once a detailed proposal has been received. The proposal, subject conditions, would therefore be acceptable in principle and would comply with the Development Plan in this respect.

2.13 Contaminated Land

2.13.1 Policy 9 and 23 of NPF4, Policies 1 and 10 of the LDP and Fife Council's Low Carbon Fife Supplementary Guidance apply.

2.13.2 Objections state that no mention has been made of contaminated land.

2.13.3 Fife Council's Land and Air Quality Team (LAQ) has no objections subject to conditions relating to contaminated land investigative and remediation works. Conditions are recommended regarding these matters. The proposal, subject to these conditions would, therefore, have no significant impact on amenity in relation to contaminated land and would comply with the Development Plan in respect.

2.14 Air Quality

2.14.1 Policy 9 and 23 of NPF4, Policies 1 and 10 of the LDP and Fife Council's Low Carbon Fife Supplementary Guidance apply.

2.14.2 An air quality assessment report (AQIA) has been submitted in support of this application. The report states that the screening assessment demonstrates that the proposal has the potential to exceed Stage 1 and Stage 2 criteria which would require a more detailed assessment to be carried out. However, the report states that the proposed masterplan zoning and planning use classes remain flexible, so potential operational air quality impact cannot be fully defined at this early stage. It recommends that a future detailed AQIA be provided at the detailed planning application stage, with the scope and study area to be agreed with the Fife Council Environmental Health Officer. The AQIA does, however, assess the construction impact of the proposal and states that the proposal will have a negligible impact upon the local air quality during the construction phase and the resulting effects are therefore predicted to be not significant.

2.14.3 Objections state that the proposal will result in air pollution and any new traffic lights on Denburn Narrows would mean traffic idling which could cause a constant stream of pollution.

2.14.4 The LAQ team has no objection to the proposal in terms of air quality impact and they have requested a condition requiring that a detailed air quality impact assessment be submitted at the AMSC stage. A condition is recommended regarding this matter. The proposal, subject to this condition, would therefore be acceptable in principle with regards to air quality impact and would comply with the Development Plan in this respect.

2.15 Core Paths/Rights of Way

2.15.1 Policy 20 of NPF4 and Policies 1 and 13 of the LDP apply.

2.15.2 A Core Path (P071/04 - Crail coast to Wormiston) runs past the south-western and western boundary, whilst a proposed future Core Path (PF52 – Crail to Crail Airfield) runs adjacent to the south-eastern boundary of the site. Balcomie Road is also part of the Core Path Network (P073/01 - Kilminning coast to Crail via Road). A condition is recommended requiring that the adjacent Core Paths remains free from obstruction during the construction period of the development. The proposal, subject to this condition, would therefore be acceptable and would comply with Development Plan Policy in this respect.

2.16 Waste Management

2.16.1 Policy 12 of NPF and Policies 1 and 10 of the LDP apply.

2.16.2 The submitted information demonstrates that there is sufficient space within the curtilage of the proposed site to accommodate any required bin storage facilities and a condition is recommended requiring that full details regarding this matter shall be submitted at the AMSC stage. The proposal subject to conditions would, therefore, be acceptable in principle and would comply with the Development Plan in this respect.

3.0 Consultation Summary

| | |
|---|--|
| Historic Environment Scotland | No objections |
| Community Council | Object |
| Parks Development and Countryside - Rights of Way/Access | No objections |
| Archaeology Team, Planning Services | No objections subject to conditions |
| Built Heritage, Planning Services | No response |
| Strategic Policy and Tourism | No response |
| Natural Heritage, Planning Services | No objections |
| Trees, Planning Services | No objections |
| Urban Design, Planning Services | No objections subject to conditions relating to urban design and layout. |
| Land And Air Quality, Protective Services | No objections subject to conditions |
| Structural Services - Flooding, Shoreline and Harbours | No objections subject to conditions |
| Transportation And Environmental Services - Operations Team | No response |
| Parks Development and Countryside | No response |
| NatureScot | No comments |
| TDM, Planning Services | Object as proposal does not comply with Policy 13 of NPF4. |
| Scottish Water | No objections |

4.0 Representation Summary

4.1 One hundred and thirty-six letters of objection have been received, whilst 91 further objections were submitted in relation to the proposed additional route through the U062. The Crail Community Council, who are a statutory consultee, have also objected. The concerns raised including those from the Community Council are summarised below:

4.2 Material Planning Considerations

4.2.1 Objection Comments:

| Issue | Addressed in Section |
|---|----------------------|
| No evidence to demonstrate any need for holiday homes. | 2.2 |
| Proposal is unsympathetic to FIFEplan with only firm plan to build houses. | 2.2 |
| No demand for development. | 2.2 |
| LDP allocation of Crail Airfield is inappropriate for the geography of its location. | 2.2 |
| Even if there was a second road, traffic would still drive through Crail. | 2.3 |
| Crail Local Place Plan deals with a new access to Crail airfield and this favours a new access from the A917 St Andrews Road via Crail North to Balcomie Road. | 2.3 |
| Vehicle trips fall well short of trips to and from site as number of use classes omitted from TA. | 2.3 |
| TA not accurate. | 2.3 |
| Due to inaccurate use classes the traffic generation information could be significant and detrimental. | 2.3 |
| Issue of alternative access not addressed as required in LDP. | 2.3 |
| Detrimental impact on existing infrastructure due to lack of new access and no capacity on road to absorb increase in traffic. | 2.3 |
| TA advised road cannot accommodate bus stop, but master plan includes bus stop area. | 2.3 |
| The Crail Local Place Pan does not state that there is no concern regarding increased traffic through Marketgate, Denburn Narrows and Balcomie Road. The conclusions were that a secondary access through Denburn Narrows was the least worst option. | 2.3 |
| TDM should rigorously interrogate TA figures as there are serious concerns regarding this. Community has serious concerns regarding existing use of Denburn Narrows as it is hazardous in terms of road safety for pedestrian, cyclists and cars. | 2.3 |
| Crail High Street Infrastructure is already at breaking point and additional development will worsen this. | 2.3 |
| Increase in traffic would have a detrimental impact in terms of traffic, noise and pollution. | 2.3 and 2.7 |
| Denburn Narrows, Balcomie Road and Marketgate cannot accommodate development. | 2.3 |
| Crail not well served by public transport. | 2.4 |
| TA is flawed as it understates potential traffic. | 2.3 |
| Walking and cycling will be deterred due to distance between village and site and lack of suitable connection. | 2.4 |
| Road not suitable for development. | 2.3 |

| Issue | Addressed in Section |
|---|----------------------|
| No adequate parking in centre of Crail. | 2.3 |
| Increased traffic will result in congestion. | 2.3 |
| Lack of amenities in Crail including shops. | 2.4 |
| Roads in Crail village cannot cope with additional traffic including construction vehicles. | 2.3 |
| Access road not wide enough to cope with volume of two-way traffic | 2.3 |
| New road should be constructed earlier and not in Phase 3 as per the documents. | 2.3 |
| Construction vehicles should not be allowed through the village. | 2.3 and 2.7 |
| Concerned about width of the proposed road upgrades at Denburn and Balcomie Road. | 2.3 |
| Development will cause congestion which will affect emergency vehicles response time. | 2.3 |
| There will be an opportunity to secure a secondary access via the Highpoint Crail development in the near future, however, this will require a high spec road to take additional traffic. | 2.3 |
| Proposal is contrary to Policy 13 of NPF4 | 2.3 and 2.4 |
| Site lies within a cul-de-sac of Balcomie Road. | 2.3 |
| TA has not identified the number of person trips, particularly the number of non-car related trips. | 2.3 |
| New proposals offer no resolution of the issues of site access from Crail to the Airfield and Crail Golf Courses as required by the LDP. | 2.3 |
| A new access from the A917 St Andrews Road, via Crail North to Balcomie Road is the required and only sensible solution. | 2.3 |
| There is a clear opportunity to take an holistic approach where another letter states that “our view is there will be an opportunity to secure a secondary access via the Highpoint Crail development in the near future however this will require a higher specification of road which if designed to take the airfield traffic will require a contribution from the airfield (either via Fife Council or a S75 agreement with the airfield owners) to meet the additional specification and costs incurred on their behalf by Highpoint Crail”. | 2.3 |
| Overdevelopment of site. | 2.5 |
| How does proposal integrate aesthetically with currently buildings? | 2.5 |
| Plan not in keeping with surrounding rural hamlets. | 2.5 |
| Scale of development inappropriate for small village. | 2.5 |
| Character of Crail and surrounding area would be detrimentally altered. | 2.5 |
| Appearance is inappropriate for its setting. | 2.5 |
| Not in keeping with the surrounding area | 2.5 |
| Issues with impact on listed buildings and setting, whilst issues regarding what is actually listed due to curtilage listing. | 2.5 |
| Lack of info to assess impact on listed buildings. | 2.5 |
| Impact on Listed buildings etc as if PPP is granted the implication will be that future planning permission and listed building consents must also be granted notwithstanding any impacts on each of the listed buildings. | 2.5 |
| Proposal would not preserve and improve the listed buildings and wider site. | 2.5 |
| Detrimental impact on historic environment. | 2.5 |
| How will PPP for holiday homes preserve a historic site when the holiday plots will be sold off to be developed by individual owners? | 2.5 |
| Detrimental impact on setting of listed buildings. | 2.5 |
| Impact on conservation area not considered. | 2.5 |
| No assessment of economic impact on neighbouring villages and Fife. | 2.6 |

| Issue | Addressed in Section |
|--|-----------------------------|
| Construction work would be disruptive, noise and cause pollution for residents if village route and Balcomie road is used. | 2.7 |
| The proposal could result in the closure of Crail Raceway. | 2.7 |
| Noise impact from proposal. | 2.7 |
| Traffic lights will impact on the wellbeing of the community. | 2.7 |
| Light pollution will have a negative impact on neighbouring communities. | 2.7 |
| No details relating to whether private or public sewer will be used. | 2.8 |
| There is not existing sufficient infrastructure including drainage, medical practices, shops etc. | 2.8 |
| Infrastructure such as water and sewage will not cope. | 2.8 |
| Impact on natural habitat, protected species and wildlife. | 2.9 |
| Negative impact on ecological management of greenspaces. | 2.9 |
| Will impeded nature conservation and Fife Council's ability to meet biodiversity targets. | 2.9 |
| Loss of woodland area. | 2.9.2 |
| Huge carbon footprint is inappropriate. | 2.12 |
| Air Pollution | 2.14 |
| New traffic Lights on Denburn Narrows would mean traffic idling which would cause a constant stream of pollution. | 2.3 and 2.14 |
| No mention of contaminated land. | 2.13 |

4.2.2 Other Concerns Expressed

| Issue | Comment |
|---|---|
| Use classes are missing from the proposal description as application makes no reference to classes 1, 2, 3, 7, 8, 9, 10 and 11. Application form fails to identify class 6 use includes distribution and the application is misleading as it does not show certain use classes and only includes general descriptions, therefore, Fife Council could not resist an application for a class 9 residential use, class 8 care home or class 7 hotel. | The proposal is set out within section 1.2 of this report of handling. |
| NPF does not override LDP policies. | See section 1.4 |
| NPF4 policies not compatible with LDP allocation. | See section 1.4 |
| Application should have been advertised as a departure to Local Plan. | This application was advertised on 16th May 2024 and does not require to be re-advertised as per regulation 20 (5) of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013. |
| Just about every conceivable use would be allowed on site creating a new settlement and the use classes are not clearly defined. | This application and the proposed uses have been fully assessed within this report of handling. |
| Proposal does not address issues raised at pre-application consultation events and no changes have been made since PAC events as stated within the PAC report. | See section 1.4.3. |

| Issue | Comment |
|--|--|
| What is to stop plot owners applying for change of use in future to full residential use? | There is nothing to stop a person from applying for full planning permission for any type of proposal, however, each application would be assessed on its own individual merits. |
| How will use classes be enforced in future and how will the holiday accommodation use be policed and enforced? | Any approved development must comply with the terms of the approved consent including the approved plans and conditions. Enforcement Action may be taken by this Planning Authority should it transpire that this not the case. A section 75 legal agreement is also proposed as part of this recommendation for approval. This would control the occupancy of the proposed holiday accommodation. |
| No planning gain outwith red line boundary such as access improvement. | The proposal including any suggested improvement are fully assessed within this report of handling. |
| Landowner previously tried to water down requirements for alternative access to read "may be required" in FIFEplan but no change was made. | This is not a material planning consideration. |
| PAC meetings were poorly advertised. | See section 1.4 |
| Hotel is not financially feasible based on historic evidence of other hotels in area. | The demand for a hotel in this area is not a material planning consideration. |
| No planning gain as there would be no new pupils for school, no affordable housing and no new cycle paths. | This is not a material planning consideration, and the proposal is fully assessed within this report of handling. |
| Proposal does not address lack of affordable housing in Crail. | This type of development is not required to provide affordable housing as part of the development. |
| Object to the current practice of not allowing objectors and others to see public comments until consultation is closed as this could be completed in minutes. Looks like an attempt to limit public commentary. | This is a current Fife Council Process and is not a material planning consideration within the assessment of this application. |
| Application does not set out benefits to village. | See section 2.6 |
| Plans are vague and no detail of holiday homes | See section 1.2 |
| Conflict with the existing public consultation process regarding future of Crail. | This application must be assessed on its own individual merits against the current Development Plan, and this is not a material planning consideration. |
| Crail is a tourist attraction because of the way it is, and no change is needed. | The proposal and its impact on the surrounding area is fully assessed within this report of handling. |

| Issue | Comment |
|--|---|
| Little info on nature, size and frequency of events across the development site. | This application is for planning permission in principle and sufficient information has been submitted to allow a full assessment of the proposal. |
| How does proposal site with current Government policy? | The assessment of this application against the current Development Plan and relevant guidance is set out within this report of handling. |
| How does proposal compare against previous decisions? | See section 1.3 |
| Site is not brownfield and is a large rural area where agricultural land should not be lost. | Crail Airfield is a brownfield site as set out within this report of handling. |
| Should be a retail park | This Planning Authority can only assess the application as has been submitted. |
| No guarantee that works on third party land can be carried out. | See section 2.3 |
| Crail has passed acceptable tourism limits. | See section 2.2 |
| New proposal outwith site boundary cannot be considered within the context of current application. | See section 2.3 |
| Will damage the marketing collateral of the East Neuk. | See section 2.6 |
| Consultation has not been extensive enough. | The consultation carried out in relation to this application is considered to meet the relevant national guidance and regulations. |
| Elements of the proposal have not been fully developed in any way and should be rejected. | This application is for planning permission in principle and sufficient information has been submitted to allow a full assessment of the proposal. |
| Secondary routes would result in the loss of prime agricultural land. | See section 2.3 |
| Clients should be able to speak at committee or be represented. | The current Planning Committee process does not allow the public to speak during committee, however, all submitted representations are fully considered within this report of handling. |
| Objections to proposed route through U062 (Option C) - See section 2.3. This route was a potential alternative route suggested during this live application, however, it did not proceed, therefore, the comments listed below are not relevant to the assessment of this proposal. | |
| | |
| Detrimental impact on NE Fife District Campsite at Wormiston due to route through site. | |
| The new road and access route involves several landowners who have not been consulted and goes through a local camp site. | |
| Loss of area for scout's camp site due to route through U061. | |
| If additional documents are accepted, then this could result in judicial review. | |

| Issue | Comment |
|---|---------|
| No Transport Assessment for additional proposals. | |
| Walking/cycling route would be detrimentally impacted upon if used for new access to site on U062. | |
| Alternative access on U062 is inappropriate based on traffic, cyclist and pedestrian safety. | |
| Granting of permission could be open to legal challenge due to new access road outwith site. | |
| Proposed use of U062 is wholly inappropriate. | |
| Detrimental impact on setting of listed building as a result of new route on U062. | |
| Passing places on U062 will not make it a safe access road, | |
| Second route off U062 could not accommodate uplift in traffic. | |
| Risk to pedestrian safety on U062 | |
| Introduction of route to U062 was advertised and publicised, therefore, the removal of this route should also be subject to the re-notification process. | |
| Proposal could result in "Crail New Town" given that class 9 uses are indicated in 5 or 6 of the zoning areas. | |
| Land ownership re-notification should have taken place for new route etc. | |
| New proposals constitute a material and significant change to the original application. App should be withdrawn, and a new app submitted which would be subject to PAC. | |

5.0 Conclusions

5.1 The proposal would be for a tourism and commercial development on a site allocated for these uses which would bring about a community and economic benefit to the site and surrounding area. The proposal would also include the re-use of redundant buildings and brownfield land including vacant and derelict land and would involve the potential appropriate re-use of redundant listed buildings which could help secure the future of these historic assets. The principle of this proposal at this location would, therefore, be acceptable in this instance. The proposal does not provide an alternative route into the site but does, as far as possible, resolve site access issues from Crail to the airfield as required by the LDP. The submission also demonstrates that the Balcomie Road access and the surrounding road network along with the proposed road improvements would be acceptable and could safely accommodate the development. The proposal subject to conditions could also be compatible with its surrounds in terms of land use and could be designed to cause no unacceptable significant impacts on the surrounding area in terms of natural heritage, transportation/road safety, amenity, surface water run-off, contaminated land, air quality, sustainability or in terms of its visual and landscape impact or in terms of its impact on the adjacent historic environment. These detailed matters would, however, be fully assessed at the AMSC stage. The proposal overall would, therefore, be acceptable in principle.

6.0 Recommendation

It is accordingly recommended that the application be approved subject to:

- A. The conclusion of a legal agreement to secure; that the 91 holiday accommodation plots located in the accommodation area and shown dark green on the zoning plan shall be used and occupied as holiday accommodation only and shall not be sold or let as a permanent dwellinghouse and shall not be occupied for a continual single holiday period of more than 12 continuous weeks in any calendar year.

- B. That authority is delegated to the Head of Planning Services, in consultation with the Head of Legal & Democratic Services, to negotiate and conclude the legal agreement
- C. That should no agreement be reached within 6 months of the Committees decision, authority is delegated to the Head of Planning Services, in consultation with the Head of Legal & Democratic Services, to refuse the application.

and the following conditions and reasons:

CONDITIONS:

1. The development to which this permission relates must be commenced no later than 5 years from the date of this permission.

Reason: In order to comply with the provisions of Section 59 of the Town and Country Planning (Scotland) Act 1997, as amended by Section 32 of The Planning (Scotland) Act 2019.

2. Plans and particulars of the matters listed below shall be submitted for consideration by the planning authority, in accordance with the timescales and other limitations in section 59 of the Town and Country Planning (Scotland) Act 1997 (as amended). No work shall begin until the written approval of the authority has been given, and the development shall be carried out fully in accordance with that approval.

(a) The construction of holiday accommodation units and associated infrastructure.

(b) The construction of craft workshops/light industrial (Class 4), storage buildings (Class 6) and any associated infrastructure.

(c) Sustainable Drainage System (SuDS) and drainage infrastructure.

(d) Roads, access, footpath and cycle path provision.

(e) Open space, community areas and landscaping.

Reason: as this application is made for planning permission in principle only; to comply with Section 59 of The Town and Country Planning (Scotland) Act 1997 as amended.

3. Every application for approval of matters specified by Condition 2 shall be submitted for the written approval of the planning authority with the following information, where relevant and unless agreed otherwise with Fife Council as Planning Authority:-

(a) A location plan of all the site to be developed to a scale of not less than 1:2500, showing generally the site, any existing trees, hedges, walls (or other boundary markers) layout of the roads and sewers, and the position of all buildings. This plan should be sufficient to identify the land to which it relates and should show the situation of the land in relation to the locality and in relation to neighbouring land.

- (b) A detailed plan to a scale of not less than 1:500 showing the site contours, the position and width of all proposed roads and footpaths including public access provision, the siting of the proposed buildings, finished floor levels, new walls and fences, details of proposed landscape and public realm treatment (including materials). These details shall also show the provision of a bus turning circle and bus stop either within the site or within the site but adjacent to Balcomie Road.
- (c) Detailed plans, sections and elevations of all buildings proposed to be erected on the site, together with details of the proposed method of drainage and the colour and type of materials to be used externally for walls, windows, roofs and rainwater goods.
- (d) An updated Design and Access statement (DAS) which evidences how the design and layout has been derived by an analysis of the site and its context, and how it addresses the six qualities of successful places and how it would meet the requirements of NPF4, the Adopted FIFEplan (2017) and Making Fife's Places Supplementary Guidance (2018). The DAS shall include contextual drawings and visualisations which demonstrate how the proposal would sit on the site in relation to the surrounding area and adjacent buildings.
- (e) A detailed plan to a scale of not less than 1:500 illustrating the siting of areas of formal and informal open space and landscaping. This plan shall be accompanied by a supporting statement, which shall explain the utility of these areas of open space for a broad range of users that includes toddlers, young children, teenagers, adults, older people, and disabled persons.
- (f) An updated Landscape and Visual Impact Assessment which takes into account the detailed design layout of the proposal.
- (g) Full details of any associated proposed lighting scheme shall be submitted to and approved in writing by Fife Council as Planning Authority. The submitted scheme shall indicate the measures to be taken for the control of any glare or stray light arising from the operation of the artificial lighting and shall demonstrate that this will have no detrimental impact on any neighbouring public roads, sensitive properties or adjacent sensitive habitats with regards to light spillage and glare. The lighting scheme shall include lighting mitigation and shall utilise the methods recommended in the Institute of Lighting Professional's Bats and Artificial Lighting Guidance Note (ILP, 201833) or any subsequent revision. These methods shall include using directional and or baffled lighting, variable lighting regimes, avoidance of blue-white short wavelength lights and high UV content or creation of light barriers utilising hedgerows and tree planting.
- (h) A site engineering plan indicating earthworks, retaining walls, engineering solutions and platforming, to include sections through the site. The site engineering plan shall demonstrate and clarify the net developable area of the proposed land uses.
- (i) Construction Method Statement and Management Plan, including an Environmental Protection Plan and Scheme of Works relating to construction activities on site. Any alterations to the principles described in the Construction Method Statement and Management Plan during construction should be agreed in writing by Fife Council as Planning Authority.

(j) Details including plans showing the provision of off-street parking on the site including electric vehicle charging points, cycle and visitor parking spaces in accordance with the current Fife Council Parking Standards as contained within Appendix G (Transportation Development Guidelines) of Making Fife's Places Supplementary Guidance (2018) or any subsequent revision. These plans shall also show a turning area for the largest vehicle expected to visit the site and details of the phasing of the off-street parking provision.

(k) Details including plans showing that the required visibility splays of 4.5 metres x 210 metres, in accordance with Appendix G (Transportation Development Guidelines) of Making Fife's Places Supplementary Guidance (2018) or any subsequent revision, can be provided and maintained clear of all obstructions exceeding 600mm in height above the adjoining road channel level, at the junctions of the site accesses with Balcomie Road.

(l) Details of adequate wheel cleaning facilities which ensure that no mud, debris or other deleterious material is carried by vehicles on to the public roads. Any subsequent approved wheel cleaning facilities shall then be provided and maintained throughout the construction works.

(m) A package of public transport measures "public transport strategy" to be introduced within and outwith the site to encourage the use of public transport during the build-out of the site.

(n) A Travel Plan which sets out mode share targets and clear arrangements and timescales for delivering against targets, as well as monitoring and evaluation. The Travel Plan shall set out a list of mitigation measures to be provided should the mode share targets not be met.

(o) Supporting information from a bus operator providing evidence of their intension to serve the bus stop or evidence showing the applicant's intension to directly fund a shuttle bus service.

(p) Details showing improvement/upgrade works to Marketgate North (Denburn Narrows) which should be generally in accordance with Plan Reference 73A but amended to incorporate widening the footway on the west side/narrow the carriageway (excluding opposite Kirk Wynd); retention of the southernmost give-way; and replacement of the northernmost give way (near Roomebay Avenue) with a give-way incorporating a raised table pedestrian crossing.

(q) An energy statement of intent and details of the energy efficiency measures and energy generating technologies which would be incorporated into the proposed development as required in the Fife Low Carbon Supplementary Guidance (2019) or any subsequent revision. A manufacturers brochure/specification of any proposed energy generating technologies shall also be submitted.

(r) A surface water management plan as set out within Fife Council's Design Criteria Guidance on Flooding and Surface Water Management Plan Requirements (2020) or any subsequent revision.

(s) An air quality impact assessment as per Fife Council's Air Quality in Fife Advice for Developers or any subsequent revision.

(t) A supporting statement illustrating the development's compliance with Making Fife's Places Supplementary Guidance (2018) including reference and proposals relating to the design, layout, green network infrastructure and natural heritage and biodiversity enhancement.

(u) A Biodiversity Enhancement Plan and detailed plans of the landscaping scheme for the site including the number, species and size of all trees or shrubs to be planted and details of all hard landscaping elements, including surface finishes and boundary treatments within the site. These details shall include a programme for the implementation/phasing of the landscaping in relation to the construction of the development.

(v) Details of the future management and aftercare of the proposed landscaping and planting. Thereafter the management and aftercare of the landscaping and planting shall be carried out in accordance with these approved details.

(w) An Arboricultural Impact Assessment including a tree protection plan and arboricultural method statement which takes into account any subsequent detailed layout. This report shall include full details of all tree protection measures which require to be implemented during the construction phase of the development. No trees shall be felled, topped, lopped or have roots cut or damaged without the prior written approval of this Planning Authority.

(x) An updated Ecological Appraisal report which takes into account any subsequent detailed layout and sets out any required mitigation and biodiversity enhancement measures.

(y) Bat surveys including details of any required mitigation measures as per the Bat Conservation Trust guidelines unless otherwise agreed in writing with Fife Council as Planning Authority. These mitigation measures, if required, shall also be included within the design of the proposal.

(z) A Waste Management Statement including details showing the location of bin storage facilities.

(aa) A Contaminated Land Preliminary Risk Assessment (Phase I Desk Study) and where further investigation is recommended in the Preliminary Risk Assessment, a suitable Intrusive Investigation (Phase II Investigation Report). Where remedial action is recommended in the Phase II Intrusive Investigation Report, a suitable Remedial Action Statement shall also be submitted. The Remedial Action Statement shall include a timetable for the implementation and completion of the approved remedial measures.

All land contamination reports shall be prepared in accordance with CLR11, PAN 33 and the Council's Advice for Developing Brownfield Sites in Fife documents or any subsequent revisions of those documents. Additional information can be found at www.fife.gov.uk/contaminatedlan.

Reason: To be in compliance with Section 59 of The Town and Country Planning (Scotland) Act 1997 as amended.

4. The first application for approval of matters specified under the terms of condition 2 shall be submitted with the following information:

(a) A construction management plan including details of the proposed construction traffic routes.

(b) A design brief for the holiday accommodation units and associated infrastructure as required by condition 2. The holiday accommodation units shall be no higher than two storeys. **FOR THE AVOIDANCE OF DOUBT**; no unit sited on the 91 designated holiday accommodation plots hereby approved and shown dark green on the proposed zoning plan (Plan reference 10A) shall be so designed to meet the legal definition of a caravan as set out in the Caravan Sites and Control of Development Act 1960 (as amended) and Caravan Sites Act 1968.

5. Any subsequent approved development on site shall be carried out fully in accordance with the, hereby approved, phasing plan (Plan References: 19A, 21A and 23A) unless otherwise agreed in writing with Fife Council as Planning Authority. Should the developer wish to amend this phasing plan then an amended phasing plan must be submitted to Fife Council as Planning Authority as a further application for approval of matters specified in conditions.

Reason: In order to ensure that proper control is retained over the development and that it is carried out in a manner which ensures that the listed buildings on site are brought back into use early on in the development.

6. The holiday accommodation, hereby approved, shall be used as holiday accommodation only, shall not be sold or let or otherwise occupied as a permanent dwellinghouse and shall not be occupied for a continual single holiday period of more than 12 continuous weeks in any calendar year.

Reason: In order to ensure that proper control is retained over the development and that the site does not become permanent residential accommodation.

7. The upgrade/improvement works to Balcomie Road between the Crail Village Settlement Boundary as defined in the Adopted FIFEplan (2017) and vehicular access 2 as shown on page 41 of the Design and Access Statement (Plan Reference 41) shall be carried out in full within Phase one of the development and **BEFORE THE OCCUPATION OF THE TENTH HOLIDAY ACCOMODATION UNIT**. These improvement works shall include the widening of Balcomie Road to 5.5 metres with widened passing places of 6 metres and the provision of a 3-metre-wide shared foot path and cycle path. **NO WORKS SHALL COMMENCE ON SITE**; until an application for full planning permission, if required, has been submitted and approved for these proposed improvement works. Any variation to these improvement works must be agreed through this planning application or in writing with Fife Council as Planning Authority.

Reason: In the interest of road safety; to ensure that the upgrade/improvement works to Balcomie Road are carried out as set out in this submission and in order to ensure that proper control is retained over the development.

8. The private bus service as required by condition 3 (o) of this submission shall be retained for the lifetime of the development unless otherwise agreed in writing with Fife Council as Planning Authority.

Reason: In the interests of sustainability; to ensure the provision of a sustainable travel method.

9. The off-street parking as required by condition 3 (j) shall be provided in accordance with any approved parking phasing plan and shall be retained for the lifetime of the development.

Reason: In the interest of road safety; to ensure the provision of adequate off-street parking facilities.

10. The visibility splays as required by condition 3 (k) shall be provided BEFORE THE DEVELOPMENT IS OCCUPIED and shall be retained for the lifetime of the development.

Reason: In the interest of road safety; to ensure the provision of adequate visibility at road junctions etc.

11. The wheel cleaning facilities as required by condition 3 (l) shall be provided BEFORE CONSTRUCTION WORKS COMMENCE ON SITE AND SHALL BE PROVIDED AND MAINTAINED THROUGHOUT THESE CONSTRUCTION WORKS.

Reason: In the interest of road safety; to ensure the provision of adequate wheel cleaning facilities on site.

12. No building, vegetation, trees or scrub clearance shall occur on site from 1st March through to 31st August inclusive each year unless otherwise agreed in writing with this Planning Authority prior to clearance works commencing. If clearance is proposed between these dates, then a bird survey shall be carried out by a suitably qualified ecologist covering the proposed clearance area which provides justification and recommendations with regards to the proposed clearance works. This report shall be submitted to and approved in writing by this planning authority before those clearance works commence. Once written approval has been given the works themselves should be carried out within a specified and agreed timescale as per the agreed methodology.

Reason: In the interests of species protection.

13. NO BUILDING SHALL BE OCCUPIED UNTIL remedial action at the site has been completed in accordance with the Remedial Action Statement approved pursuant to condition 3 (aa). In the event that remedial action is unable to proceed in accordance with the approved Remedial Action Statement - or contamination not previously considered in either the Preliminary Risk Assessment or the Intrusive Investigation Report is identified or encountered on site - all development work on site (save for site investigation work) shall cease immediately and the planning authority shall be notified in writing within 2 working days. Unless otherwise agreed in writing with the local planning authority, development works shall not recommence until proposed revisions to the Remedial Action Statement have been submitted by the developer to and approved in writing by the planning authority. Remedial action at the site shall thereafter be completed in accordance with the approved revised Remedial Action Statement. Following completion of any measures identified in the approved Remedial Action Statement - or any approved revised Remedial Action Statement - a Verification Report shall be submitted by the developer to the local planning authority.

Unless otherwise agreed in writing with the planning authority, no part of the site shall be brought into use until such time as the remedial measures for the whole site have been completed in accordance with the approved Remedial Action Statement - or the approved revised Remedial Action Statement - and a Verification Report in respect of those remedial measures has been submitted to and approved in writing by the local planning authority.

Reason: To provide satisfactory verification that remedial action has been completed to the planning authority's satisfaction.

14. IN THE EVENT THAT CONTAMINATION NOT PREVIOUSLY IDENTIFIED by the developer prior to the grant of this planning permission is encountered during the development, all development works on site (save for site investigation works) shall cease immediately and the planning authority shall be notified in writing within 2 working days.

Unless otherwise agreed in writing with the local planning authority, development work on site shall not recommence until either (a) a Remedial Action Statement has been submitted by the developer to and approved in writing by the planning authority or (b) the planning authority has confirmed in writing that remedial measures are not required. The Remedial Action Statement shall include a timetable for the implementation and completion of the approved remedial measures. Thereafter remedial action at the site shall be completed in accordance with the approved Remedial Action Statement. Following completion of any measures identified in the approved Remedial Action Statement, a Verification Report shall be submitted to the local planning authority. Unless otherwise agreed in writing with the planning authority, no part of the site shall be brought into use until such time as the remedial measures for the whole site have been completed in accordance with the approved Remedial Action Statement and a Verification Report in respect of those remedial measures has been submitted by the developer to and approved in writing by the local planning authority.

Reason: To ensure all contamination within the site is dealt with.

15. The recommendations contained within the approved Ecological Appraisal report (Plan Reference 50) or any subsequent approved Ecological Appraisal report shall be carried out in full BEFORE EACH RELEVANT ASSOCIATED PHASE OF THE DEVELOPMENT IS OCCUPIED.

Reason: In the interests of species protection and biodiversity enhancement.

16. The SUDS scheme as required under the terms of conditions 3 (r) shall be carried out fully in accordance with the approved scheme and maintained as such for the lifetime of the development. The SUDS scheme shall be provided BEFORE EACH RELEVANT ASSOCIATED PHASE OF THE DEVELOPMENT IS OCCUPIED.

Reason: In the interests of drainage, to ensure adequate protection of the water environment from surface water run-off.

17. The drainage infrastructure as required by condition 3 shall be carried out in full within each relevant phase BEFORE EACH RELEVANT ASSOCIATED PHASE OF THE DEVELOPMENT IS OCCUPIED.

In the interests of drainage, to ensure that adequate drainage infrastructure is provided on site within each phase.

18. The total noise from any subsequently approved plant and machinery, shall be such that any associated noise does not exceed NR 25 in bedrooms, during the night; and NR 30 during the day in all habitable rooms, when measured within any noise sensitive property, with windows open for ventilation. For the avoidance of doubt, daytime shall be 0700-2300hrs and night-time shall be 2300-0700hrs.

Reason: In the interests of safeguarding residential amenity.

19. The Core Paths located adjacent to or within the site shall be kept clear of all obstructions for the duration of any construction period.

Reason In order to protect the core paths.

7.0 Background Papers

In addition to the application the following documents, guidance notes and policy documents form the background papers to this report.

[National Planning Framework 4 \(2023\)](#)

[FIFEplan Local Development Plan \(2017\)](#)

[Planning Guidance](#)

National Guidance and Legislation

The Historic Environment Scotland Policy Statement (2019)

Historic Environment Scotland's Managing Change in the Historic Environment's Guidance Note on Setting

PAN (Planning Advice Note) 1/2011

The Scottish Government's Policy on Control of Woodland Removal

Development Plan

National Planning Framework 4 (2023)

Adopted FIFEplan (2017)

Low Carbon Supplementary Guidance (2019)

Making Fife's Places Supplementary Guidance (2018)

Planning Policy Guidance, Customer Guidelines and Other Guidance

Policy for Development and Noise (2021)

Planning Obligations (2017)

Planning Customer Guidelines on Daylight and Sunlight (2018)

Fife Council's Minimum Distance between Windows Guidance (2011)

Fife Council's Design Criteria Guidance on Flooding and Surface Water Management requirements (2022)

The Landscape Institute's Guidelines for Landscape and Visual Impact Assessment (3rd Edition, 2013)

Report prepared by Scott Simpson, Chartered Planner

Report reviewed and agreed by Alastair Hamilton, Service Manager (Committee Lead) 2.9.24

11 September 2024

Agenda Item No. 5

Application for Full Planning Permission

Ref: 23/02628/FULL

Site Address: Land To The North Of Abbey Cottage Abbey Walk St Andrews

Proposal: Erection of 5 dwellinghouses

Site: Former Gas Holder Site, Balfour Place, St Andrews

Applicant: Mr Mark Wilson, Woodlands Longforan

Date Registered: 5 October 2023

Case Officer: Scott McInroy

Wards Affected: W5R18: St. Andrews

Reasons for Referral to Committee

This application requires to be considered by the Committee because the application has attracted six or more separate individual representations which are contrary to the officer's recommendation.

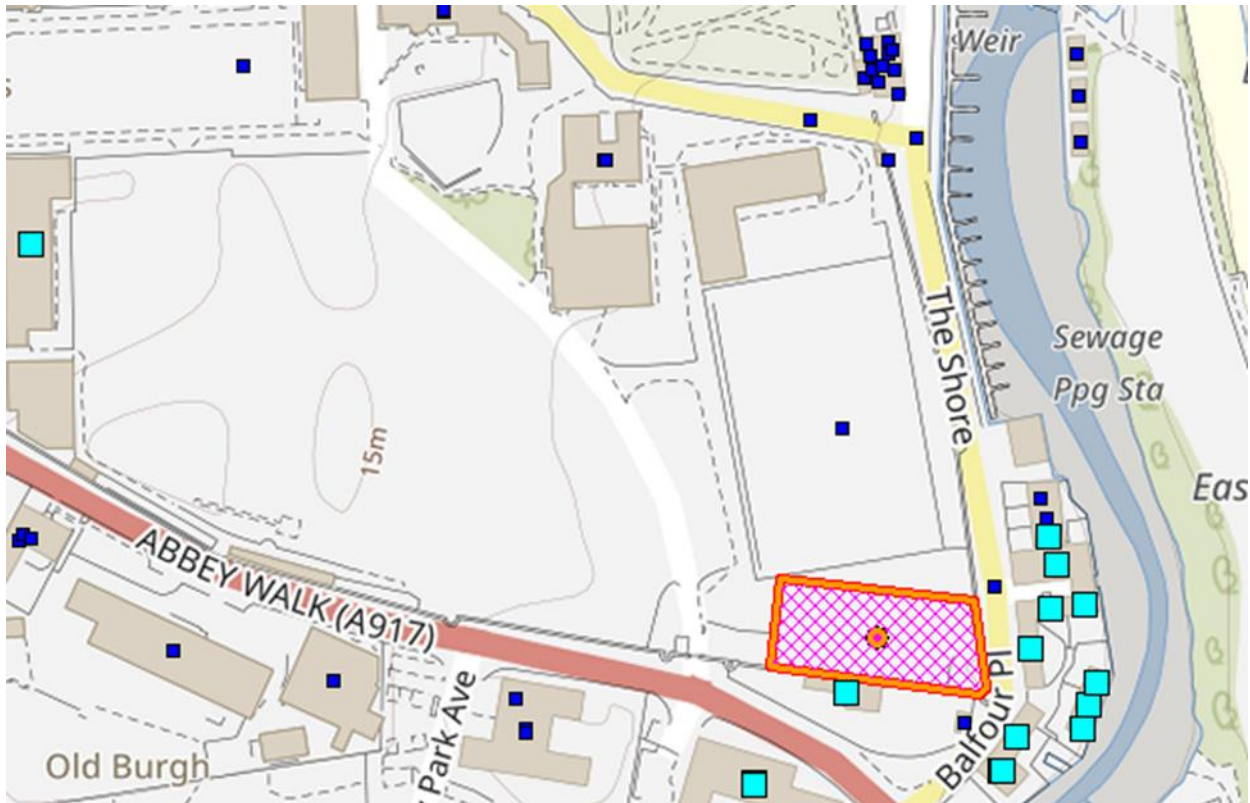
Summary Recommendation

The application is recommended for: Conditional Approval

1.0 Background

1.1 The Site

1.1.2 LOCATION PLAN



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1.1.2 The planning application site is located on the site of old gas works to the south east of St Leonards School, within the St Andrews Conservation Area and settlement boundary as per the adopted FIFEplan (2017). The site is also identified in FIFEplan as part of a larger area, the East Sands Development Policy, where proposal STA014 is classified as a development opportunity. The immediate vicinity comprises predominantly residential property and St Leonards Secondary School, although a privately owned student accommodation block is situated directly south, across the road from the planning application site. Immediately to the north of the site is an existing gas governor structure enclosed in a steel palisade fence. The site is bounded to the north and west by sporting grounds of St Leonards School, to the south by a Category B-listed single storey residential dwelling (Abbey Cottage) while Balfour Place bounds the site directly to the east. The Precinct Cathedral Wall of St Andrews Cathedral forms the perimeter of the site. The wall is a Scheduled Ancient Monument (SAM). The site is generally rectangular in shape. A main access to the site is gained via Balfour Place, through the existing arched gateway, approximately 2.5m wide and 3.5m tall. The gateway is formed within the ancient wall.

1.2 The Proposed Development

1.2.1 The proposal is for 5 detached dwelling houses, together with a shared private access drive and extensive new landscaping. The new homes would be 2-storey with three bedrooms formed on the ground level, with living rooms/kitchen dining area formed on the upper floor level. There would be car parking for 2 vehicles. The proposed dwellings are to be finished with rubble stone walls, ashlar stone lintels and stringers, oak window frames with timber external store doors and fences. All roofs are proposed to be sedum on a flat surface. The private garden grounds would be significantly planted with trees, ornamental shrubs and the rooftops would be specified as sedum roofs to manage and control water conservation and enrich biodiversity.

1.3 Relevant Planning History

1.3.1 There is no previous planning history for this site.

1.4 Application Procedures

1.4.1 Under Section 25 of the Town and Country Planning (Scotland) Act 1997, the determination of the application is to be made in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan comprises of National Planning Framework 4 (2023) and FIFEplan Local Development Plan (2017). Under Section 64(1) of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997, in determining the application the planning authority should pay special attention to the desirability of preserving or enhancing the character or appearance of the relevant designated area.

1.4.2 National Planning Framework 4 was formally adopted on the 13th of February 2023 and is now part of the statutory Development Plan. NPF4 provides the national planning policy context for the assessment of all planning applications. The Chief Planner has issued a formal letter providing further guidance on the interim arrangements relating to the application and interpretation of NPF4, prior to the issuing of further guidance by Scottish Ministers. The adopted FIFEplan LDP (2017) and associated Supplementary Guidance continue to be part of the Development Plan. The SESplan and TAYplan Strategic Development Plans and any supplementary guidance issued in connection with them cease to have effect and no longer form part of the Development Plan. In the context of the material considerations relevant to this application there are no areas of conflict between the overarching policy provisions of the now adopted NPF4 and the adopted FIFEplan LDP 2017.

1.4.3 Representations have been submitted regarding the lack of an EIA screening opinion for this application. A screening opinion was undertaken by the Local Authority and this Planning Authority determined that an EIA was not required for this proposal. The proposal falls under Class 10b (b) (Infrastructure Projects) of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017. Although the site area of the application site is less 0.5 hectares threshold as set out in this class of development, the site is within close proximity of a 'sensitive area' (Scheduled Ancient Monument) as defined in Regulations 2(1). The proposal could potentially have an impact that would necessitate the need for an Environmental Impact Assessment. Having undertaken a formal EIA Screening the opinion of the Local Planning Authority as decision maker concludes that an EIA is not required in this instance when taking into account the characteristics of the development, the environmental sensitivity of its location, the characteristics of its potential impact and the relevant EIA screening criteria. No amendments or changes made to plans/submission would impact on the Screening opinion undertaken in October 2023 and update in April. It should be noted, however, that this does not negate the requirement to fully assess the potential environmental impacts of the proposal through this planning application. It is considered that the relevant environmental issues and wider material planning considerations can be fully and appropriately assessed within the scope of the planning application process.

1.5 Relevant Policies

National Planning Framework 4 (2023)

Policy 1 & 2: Tackling the climate and nature crises.

NPF 4 Policies 1 (Climate and Nature Crises) and 2 (Climate Mitigation and Adaptation) advise that when considering proposals, significant weight to encourage, promote and facilitate development in sustainable locations and those that address the global climate and nature crises through zero carbon and nature positive places will be encouraged. As such proposals

will be sited and designed to minimise lifecycle greenhouse gas emissions and adapt to current and future risks for climate change as far as possible.

Policy 6: Forestry, woodland and trees

To protect and expand forests, woodland and trees.

Policy 7: Historic assets and places

NPF4 Policy 7 stipulates development proposals in conservation areas will ensure that existing natural and built features which contribute to the character of the conservation area and its setting, including structures, boundary walls, railings, trees and hedges, are retained and mitigated.

Policy 9: Brownfield, Vacant and Derelict and Empty Buildings

To encourage, promote and facilitate the reuse of brownfield, vacant and derelict land and empty buildings, and to help reduce the need for greenfield development.

Policy 11: Energy

NPF4 Policy 11 (Energy) also provides support for all forms of renewable, low-carbon and zero emissions technologies provided associated detrimental impacts are addressed.

Policy 12: Zero Waste

To encourage, promote and facilitate development that is consistent with the waste hierarchy.

Policy 13: Sustainable transport

NPF4 Policy 13 states that development proposals will be supported where it can be demonstrated that the transport requirements generated have been considered in line with the sustainable travel and where appropriate they will be accessible by public transport.

Policy 14: Design, quality and place

NPF4 Policy 14 states development proposals should be designed to improve the quality of an area whether in urban or rural locations and regardless of scale. NPF Policy 14 also stipulates development proposals will be supported where they are consistent with the six qualities of successful places: healthy, pleasant, connected, distinctive, sustainable, and adaptable.

Policy 15: Local Living and 20 minutes neighbourhoods

To encourage, promote and facilitate the application of the Place Principle and create connected and compact neighbourhoods where people can meet the majority of their daily needs within a reasonable distance of their home, preferably by walking, wheeling or cycling or using sustainable transport options.

Policy 16: Quality Homes

NPF4 Policy 16 aims to encourage, promote and facilitate the delivery of more high quality, affordable and sustainable homes, in the right locations, providing choice across tenures that meet the diverse housing needs of people and communities across Scotland.

Policy 19: Heat and cooling

To encourage, promote and facilitate development that supports decarbonised solutions to heat and cooling demand and ensure adaptation to more extreme temperatures.

Policy 22: Flood risk and water management

NPF4 Policy 22 Flood Risk and Water Management states proposals at risk of flooding or in a flood risk area will only be supported if for: i. essential infrastructure where the location is required for operational reasons; ii. water compatible uses; iii. redevelopment of an existing building or site for an equal or less vulnerable use; or iv. redevelopment of previously used sites in built-up areas where the LDP has identified a need to bring these into positive use and where proposals demonstrate long-term safety and resilience can be secured in accordance with SEPA advice. The protection offered by an existing formal flood protection scheme or one under construction can be taken into account when determining flood risk. In such cases, it will be demonstrated by the applicant that: all risks of flooding are understood and addressed; there is no reduction in floodplain capacity, increased risk for others, or a need for future flood protection schemes; the development remains safe and operational during floods; flood resistant and resilient materials and construction methods are used; and future adaptations can be made to accommodate climate change effects.

Proposals will: (i) not increase the risk of surface water flooding to others, or itself be at risk; (ii) manage all rain and surface water through sustainable urban drainage systems (SUDS), which should form part of and integrate with proposed and existing blue-green infrastructure. All proposals should presume no surface water connection to the combined sewer; (iii) seek to minimise the area of impermeable surface.

Proposals will be supported if they can connect to the public water mains. If connection is not feasible, the applicant will need to demonstrate that drinking water will be sourced from a sustainable water source resilient to periods of water scarcity.

Proposals for natural flood risk management, including blue and green infrastructure, will be supported.

Adopted FIFEplan (2017)

Policy 1: Development Principles

FIFEplan Policy 1 Development Principles states that development proposals will be supported if they conform to relevant Development Plan policies and proposals and address their individual and cumulative impacts. The principle of development will be supported if the site is either within a defined settlement boundary and compliant with the policies for the location or in a location where the proposed use is supported by the Local Development Plan.

Policy 2: Homes

FIFEplan Policy 2 Homes states that housing development will be supported to meet strategic housing land requirements and provide a continuous 5-year effective housing land supply. Proposals will be supported on sites allocated for housing in FIFEplan or on other sites provided the proposal is compliant with the policies for the location.

Policy 3: Infrastructure and Services

FIFEplan Policy 3 states where necessary and appropriate as a direct consequence of the development or as a consequence of cumulative impact of development in the area, development proposals must incorporate measures to ensure that they will be served by adequate infrastructure and services. Such infrastructure and services may include local transport and safe access routes which link with existing networks, including for walking and cycling, utilising the guidance in Making Fife's Places Supplementary Guidance.

Policy 10: Amenity

FIFEplan Policy 10 Amenity states that development will only be supported if it does not have a significant detrimental impact on the amenity of existing or proposed land uses. Development proposals must demonstrate that they will not lead to a significant detrimental impact on amenity in relation to air quality, contaminated and unstable land, noise/light/odour pollution, traffic movements, privacy, loss of sunlight/daylight, visual appeal of surrounding area or the operation of existing or proposed businesses. Policy 10 also states development proposals must demonstrate that they will not lead to a significant detrimental impact on amenity in relation to traffic movements.

Policy 11: Low Carbon Fife

FIFEplan Policy 11 Low Carbon Fife states that planning permission will only be granted for new development where it has been demonstrated that the proposal meets the current carbon dioxide emissions reduction target (as set out by Scottish Building Standards), and that low and zero carbon generating technologies will contribute at least 20% of these savings from 2020. It states that construction materials should come from local or sustainable sources, water conservation measures should be put in place, SUDS should be utilised, was recycling facilities should be provided. Policy 11 advises that all development should encourage and facilitate the use of sustainable transport appropriate to the development, promoting in the following order of priority: walking, cycling, public transport, cars.

Policy 12: Flooding and the Water Environment

FIFEplan Policy 12 Flooding and the Water Environment states that development proposals will only be supported where they can demonstrate that they will not, individually or cumulatively increase flooding or flood risk from all sources on the site or elsewhere. To ascertain the impact on flooding, developers may be required to provide a flood risk assessment addressing potential sources of flooding and the impact on people, properties, or infrastructure at risk.

Policy 14: Built and Historic Environment

FIFEplan Policy 14 Built and Historic Environment states that development which protects or enhances buildings or other built heritage of special architectural or historic interest will be supported. Proposals will not be supported where it is considered they will harm or damage listed buildings or their setting, including structures or features of special architectural or historic interest and sites recorded in the Inventory Historic Gardens and Designed Landscapes. For all historic buildings and archaeological sites, whether statutorily protected or not, support will only be given if, allowing for any possible mitigating works, there is no adverse impact on the special architectural or historic interest of the building or character or appearance of the conservation area.

National Guidance and Legislation

Sections 59 and 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997

Historic Environment Scotland Policy Statement (June 2016)

Historic Environment Scotland's Managing Change in the Historic Environment (2010)

PAN 1/2011: Planning and Noise

Supplementary Guidance

Making Fife Places Supplementary Planning Guidance (2018)

This document sets out Fife Council's expectations for the design of development in Fife. It explains the role of good design in creating successful places where people will want to live work and play through an integrated approach to buildings, spaces and movement.

Supplementary Guidance: Low Carbon Fife (2019)

Low Carbon Fife Supplementary Planning Guidance provides guidance on assessing low carbon energy applications; demonstrating compliance with CO2 emissions reduction targets and district heating requirements; and requirements for air quality assessments.

Planning Policy Guidance

St Andrews Design Guidelines (2011)

This sets out a number of principles to ensure appropriate design and materials are incorporated into new development. The guidance advises that buildings should respect the historic townscape but ensure the continued economic vibrancy of the town centre and embrace the opportunities for high quality design solutions, including contemporary design where appropriate.

East Sands Urban Design Framework (2010)

The purpose of this Urban Design Framework is to describe how design policies and principles should be implemented to control, guide and promote development in this location in a coordinated manner. The document provides a broad framework for buildings, movement and spaces that will inform more detailed development briefs, masterplans, and planning applications proposed within the area covered.

Planning Customer Guidelines

Fife Council Planning Customer Guidelines: Garden Ground (2016)

Fife Council Planning Customer Guidelines: Daylight/Sunlight (2022)

Other Relevant Guidance

Fife Council's St Andrews Conservation Area Appraisal and Management Plan (2010)

This provides a detailed conservation review of the town's Conservation Area boundaries. Further to this, it also aims to highlight the key townscape, architecture and historic issues considered to be important to the character of the town as a whole. The document also identifies important conservation issues and provides a framework for the conservation area's future management. The general advice, guidance, and management considerations referred to are relevant to all new development opportunities within the Conservation Area itself and mirror the advice contained within the HES Historic Environment Policy for Scotland (May 2019).

2.0 Assessment

2.1 Relevant Matters

The matters to be assessed against the development plan and other material considerations are:

- Principle of Development
- Design/Visual Impact on Conservation Area and Setting of Listed Building
- Residential Amenity
- Garden Ground
- Transportation/Road Safety
- Flooding and Drainage
- Contaminated Land and Air Quality
- Trees
- Archaeology
- Low Carbon
- HMO

2.2 Principle of Development

2.2.1 Policies 1, 9, 14, 15 and 16 of NPF4, Policies 1 and 2 of the LDP and the East Sands Urban Design Framework (2010) apply.

2.2.2 Concerns have been raised regarding the principle of development, whilst 3 supporting comments have been received supporting development in this location. The application site is located within the settlement boundary of St Andrews (FIFEplan, 2017), in an area which is largely characterised by a mixture of uses including residential properties, secondary school, leisure and tourism related uses. The application site is designated as a development opportunity site (ref STA 014, as per the adopted FIFEplan 2014) which is covered by the East Sands Urban Design Framework (2010). Within the East Sands Urban Design Framework, the site itself is highlighted as a redevelopment site. Given the residential nature of the proposal and the character of the surrounding area, and that the proposal would redevelop a brownfield site, the development is deemed to be acceptable in general land use terms. The proposal is therefore considered to meet the requirements of the policies outlined above and is thus deemed to be acceptable in principle, complying with the location requirements of Policy 1. The overall acceptability of any such development with regard to Policy 1 must however also satisfy other relevant Development Plan policy criteria as identified in Section 2.1 of this report.

2.3 Design/Visual Impact on Conservation Area and Setting of Listed Building

2.3.1 The relevant provisions of NPF4 policies 7 and 14 and FIFEplan Policies 1, 10 and 14 apply. East Sands Urban Design Framework (2010), Making Fife's Places Supplementary Guidance (2018), St Andrews Conservation Area Appraisal and Management Plan (2010), St Andrews design Guidelines (2011), Historic Environment Scotland Policy Statement (2019), and Historic Environment Scotland Managing Change series are also relevant here.

2.3.2 Concerns have been raised regarding the impact on the Built Heritage of this area, whilst 3 supporting comments have been received supporting the design and choice of materials proposed for the dwellings. The proposed dwellings are to be finished with rubble stone walls, ashlar stone lintels and stringers, oak window frames with timber external store doors and fences. All roofs are proposed to be sedum on a flat surface. Window frames, detailing, garage doors, screens and gates will be constructed in oak. The palette of materials has been chosen

to complement both the immediate context and the wider streetscape of St Andrews. The terraced levels across the site in conjunction with sunken areas in the rear gardens, create contained private courtyards for each house. With regards to the building form and material, it is considered that the proposal offers a distinctive design. There is a simplicity to the proposed design and materiality, and this helps the development to blend in comfortably when read against the historic wall context. The buildings would not be significantly visible from outside the site. From one of the more sensitive viewpoints, looking from The Pends/Shorehead, the development may be visible, but it would not extend above the height of the existing wall. From this view, other modern development sitting higher than the existing walls would be prominent - the proposed development would be more visually subservient to the precinct walls than the nearby buildings. The palette of materials (rubble stone walls, ashlar stone lintels) and design proposed take their cues from other recent contemporary developments in sensitive areas of St Andrews such as the architects award winning scheme in West Burn Lane. The proposed materials and design are considered acceptable in this historic setting.

2.3.3 With regards to the surrounding built heritage, the proposals do not involve any works to the stone precinct walls or archway and a non-build exclusion zone will be created around the walls to respect the historic setting. The contemporary timber gates on the stone gateway will be left open, which will enhance the views through to the site from Balfour Place. Category C listed buildings can be found on Balfour Place to the east of the application site. These listed properties cannot be seen from the site because of the stone precinct wall and are therefore not affected by the proposals. Abbey Cottage on Abbey Walk (LB40839) is listed Category B house and is located on the south side of the site adjacent to the precinct wall. The house cannot be seen from the site because of the stone precinct wall and is therefore not affected by the proposals. There is a bathroom window on the northern wall overlooking the site at low level, which will be screened by the proposed cycle store and landscape planting. It is concluded that although the addition of this development will be a change to the immediate area, it will not significantly affect the architectural appearance of the neighbouring listed buildings or scheduled monument, nor the character of the Conservation Area.

2.3.4 Concerns have been raised that the proposal does not conform with the East Sands Urban Design Framework (2010). The application site falls within the area covered by the East Sands Urban Design Framework (2010), in particular The Harbour Area as set out in Figure 2 of that document. The East Sands Urban Design Framework sets out key principles for the development of the site. The site itself is highlighted as a development opportunity site and the proposal itself complies with a number of the key principles set out in the Framework. The relevant principles from the East Sands Urban Design framework are set out below together and how the proposal is considered to comply or not to comply with them:

- Principle 1: Historic Skyline – the proposals do not rise above, or adversely impact on sightlines to the historic skyline from the Key Viewpoints on the main approaches and Fife Coastal Path.
- Principle 2: Landmarks – given that the proposal would be hidden by the scheduled Abbey wall and only visible from St Leonards playing fields, the proposal would not detract from the town's historic landmarks or dominate the townscape within the East Sands area.
- Principle 3: The pattern of development – as the application site is a brownfield vacant site, development here would enhance this part of the Framework Area. The pattern of development proposed reflects existing development nearby.
- Principle 4: Site Assets –The 'no build zone' around the precinct walls and the positioning of the houses respect the setting of the conservation area and adjacent listed buildings and scheduled monument.

- Principle 5: Building heights -The proposed dwellings would be 2 storeys in height and not visible above the Abbey walls,
- Principle 6: Contemporary Design – the contemporary approach is of high architectural merit and uses high quality materials. The proposals directly respond to the stone boundary walls in terms of height, scale, proportion and massing. The ‘no build zone’ around the precinct walls and the positioning of the houses respect the setting of the conservation area and adjacent listed buildings. The finishing materials (natural stone, sedum roof) are appropriate in this location and provide many environmental benefits.
- Principle 7: Visual Analysis – the stone boundary walls contain the proposals, which are not visible from the Key Viewpoints V4 Shore Bridge and V5 Down Abbey Walk. The proposals will be seen in the distance from V1 Fife Coastal Path Over Kirk Hill, but the proposed stone walls, sedum roof and landscape provision will ensure the development blends with the setting.
- Principle 10: Vehicles & Heritage – parking is incorporated within the house design ensuring minimal visual impact on the built heritage.
- Principle 11: Sustainable Transport & Access – the town facilities and public transport are all within the 20-minute walk zone, with the town centre itself being just over 550m away. The nearest bus stop is 150m away on Abbey Walk. Each house will have dedicated cycle storage to encourage active travel to town centre facilities.
- Principle 12: Movement and the public realm – given the different land ownerships surrounding the application site and that the area to the west is an education facility proposed pedestrian links are not proposed east-west through the site.
- Principle 16: Flood Risk - the development site and entrance road are out-with all flood predictions on SEPA flood maps. All houses achieve flood free finished floor levels for living quarters.
- Principle 17: Vacant Brownfield Sites – the development will improve visual amenity and bring this brownfield site back into use.

2.3.5 The application site is also mentioned as a development opportunity site in the East Sands Urban Design Framework (2010), set out in Figure 12 - 1 Former gas holder. The development principles from Figure 12 are set out below and how the proposal does or does not comply with them:

- The scale of any development must respect/ enhance significant heritage factors - Scheduled Monument, Conservation Area, grade-A listed walls. - The contemporary approach is of high architectural merit and uses high quality materials. The proposals directly respond to the stone boundary walls in terms of height, scale, proportion and massing. The ‘no build zone’ around the precinct walls and the positioning of the houses respect the setting of the conservation area and adjacent listed buildings. The finishing materials (natural stone, sedum roof) are appropriate in this location and provide many environmental benefits.
- Archway onto Balfour Place must be preserved. Existing gates should be replaced with bespoke gate in timber/architectural metalwork that provides pedestrian access only – The proposal itself does not propose replacement gates (the existing gates are proposed to be kept open). The archway is proposed to be preserved. The archway is proposed to provide vehicular and pedestrian access to the site. The proposal in terms of its layout, design and redevelopment of a brownfield site would improve the visual amenity of the site and given TDM support the scheme it is considered acceptable to depart from what is set out in the East sands Urban Design framework (2010).

- Development must not be visible above the walls from Key Viewpoints -The development would not be visible above the Abbey Walls.
- Elevations towards Balfour Place, seen through the archway must be carefully considered - There would be limited views of the development through the archway given the orientation of the development.

While the proposal does not wholly comply with the above relevant key principles and development principles of the East Sands Urban Design Framework, however given that the proposal would redevelop a vacant brownfield site with a high-quality design, it is considered acceptable to depart from what is set out in the East sands Urban Design framework (2010).

2.3.6 It is considered that the proposal respects the character, appearance, and prevailing pattern of the area in terms of density, scale, design, and external finishes and therefore complies with the relevant Development Plan policies and guidelines relating to design and visual impact. Further to that it would respect the character of the wider conservation area.

2.4 Residential Amenity

2.4.1 The relevant provisions of NPF4 policy 14 and FIFEplan Policies 1 and 10 apply. Fife Council Planning Services Garden Ground and Daylight and Sunlight, Customer Guidelines also apply.

2.4.2 Concerns have been raised regarding the impact on the amenity of the adjacent school from the construction works and the potential for noise complaints to be made to the school following occupation of the houses by future residents. The nearest school building is over 150m to the north of the application site on the other side of the astroturf playing fields. Given this distance it is considered that the proposal would not create any significant noise or concerns for the use of the existing school buildings. With regards to the wider school playing fields which sit to the north west of the application site, they are over 45m from the nearest proposed dwelling and there is mature planting and a footpath link between the playing field and the application site. Therefore, it is considered that although there will be noise from the construction phase, the finalised development would not create any significant noise or odour impact on the wider school playing fields. Any construction noise would also be for a temporary period.

2.4.3 Adjacent to the northern boundary of the site is St Leonards School's astroturf playing field which has flood lights. This facility is also used out with normal school hours until 10pm, as advised by third party representations. The proposed dwellings would be 12m away from the mutual boundary of the school to the north and over 16m to the astroturf pitches themselves. With regards to concerns regarding light spillage, the design of the houses is such that all of the living spaces and bedrooms face south, away from the courts to the North, with the only windows facing the north being from the entrance halls at ground floor level and kitchen/dining at first floor level. The predominant first floor elevation facing the astro turf pitches being masonry. Planting is proposed to the northern boundary that would in due course provide all year-round coverage which would also act as a buffer for potential light spillage. Light spillage however would only be onto the access court and parking areas. Given the angle of the flood lights, proposed layout of the dwellings and proposed planting to the north, it is considered that this would mitigate any potential detrimental residential amenity issues which might arise from light spillage.

2.4.4 With regards to concerns relating to existing noise from the use of the school floodlit pitches attracting complaints from future residents of the proposed dwellings, it is considered that the proposed dwellings are laid out internally such that the most sensitive habitable rooms are located on the ground floor (bedrooms) and at first floor level the dining and kitchen areas in

each house are mostly shielded with a solid masonry wall. The proposed dwellings would be over 12m to the mutual boundary to the north at the nearest point and over 16m to the astroturf pitches themselves. Given the distance from the habitable rooms to the astroturf pitches it is considered that the new dwellings would not be detrimentally affected by the use of the pitches. Furthermore, the private garden areas are proposed to be located to the south (rear) of the proposed dwellings and would be over 27m from the astroturf pitches, therefore noise from the pitches would be significantly shielded by the dwellings themselves. Planting is proposed to the northern boundary that would provide all year-round coverage which would also contribute to buffer for potential noise concerns in the mutual access and parking court area.

2.4.5 While any construction noise would also be for a temporary period. A condition has also been added requiring the applicant to submit a Scheme of Works Report to mitigate the effects on sensitive premises/areas (neighbouring properties and road) of dust, noise and vibration from the construction phase of the proposed development. Under the Control of Pollution Act 1974, Section 60 Fife Council Protective Services can control noise from construction sites by serving a notice. This notice can specify the hours during which work may be carried out. It is considered that this is more effective than reliance on the planning enforcement system in that regard. Again, the submission of a Scheme of Works Report for the Council's prior approval would include proposed construction working practices and hours of construction operations, and this report would be discussed with colleagues from Environmental Health prior to it being agreed by officers. A draft condition has been included for Member's consideration should they resolve to approve the application in line with the Service recommendation.

2.4.6 Concerns have been raised regarding the potential for residents of the application site looking onto school playing fields. The design of the houses is such that all of the living spaces and bedrooms face south, away from the courts to the North. The proposed development is laid out in a fashion so that each unit is complementary to the next, assuring no overlooking and maximum light and views from each unit to the garden and Precinct Wall. At first floor level, the principle windows and terrace area would look onto the Precinct Wall and private garden area and would not impact on the residential amenity of the surrounding area. The windows at first floor level to the north are on the northeastern corner of the front elevation and would be from open-plan dining kitchen areas (the lounge area/living room area would be located to the rear-south) and would look onto the access lane then onto the floodlit courts/pitches at St Leonards. These secondary windows for this space would be 12m from the mutual boundary to the north and there is also proposed planting to the north which would be designed for all year-round coverage to create a natural boundary which will obscure views through to the pitches and mitigate against any potential residential impacts in this area.

2.4.7 A 3 storey 3 dwelling terrace development on the west side of The Shore (albeit outside the abbey wall) was approved and built in recent years which is situated just over 20m away from the astroturf pitches at St Leonards. This development has habitable rooms to the front at second floor level and is a similar distance away to the astroturf pitches as the proposed dwellings from this application and there have been no noise or light complaints submitted from this development with regards to the adjacent astroturf pitch.

2.4.8 Given the residential nature of the proposed development, it is considered that the proposed dwellinghouses would not give rise to any significant detrimental impacts in terms of light, odour and noise pollution for neighbouring properties during the construction phase or occupation. In addition, given the distance from the existing school pitches and orientation of the dwellings and accommodation within them, nor would future residents of the proposed dwellings be subjected to or detrimentally affected by existing neighbouring uses to any significant degree that would justify refusal of planning permission.

2.4.9 Concerns have been raised regarding bin storage/collection. With regards to bin provision, the bin stores would be located to the rear of each property. An area of hardstanding is to be created at the eastern section of the application site and on collection days bins will be taken

here for pickup by the collection team, negating the need for refuse lorries to enter the development itself. This would therefore not create an impact on Balfour Place or the surrounding neighbours. The distance from the furthest bin to the roadside is less than 15m.

2.4.10 In conclusion, the proposed development is not considered to raise any adverse residential amenity concerns nor result in any unacceptable non-conforming use issues with established uses and is thus deemed to be acceptable, complying with the requirements of FIFEplan (2017).

2.5 Garden Ground

2.5.1 The relevant provisions of NPF4 policy 14 and FIFEplan Policies 1 and 10 apply. Fife Council Planning Services Garden Ground Customer Guidelines also apply.

2.5.2 Concerns have been raised by objectors regarding the proposed garden ground provision. The private rear gardens proposed through this development would provide just less (90m²) than the 100m² of private external recreational space set out in Fife Council's Planning Customer Guidelines on Garden Ground. However, given that this proposal would regenerate a brownfield site and that the principle of development is acceptable and, it is additionally recognised that the proposed dwellings are well located with regard to safe and easy access to public greenspace locally. It is therefore considered that the garden ground guidance can be relaxed on this occasion.

2.6 Transportation/Road Safety

2.6.1 Policies 13, 14, and 15 of NPF4, Policies 1 and 3 of the LDP, Making Fife's Places Supplementary Guidance and the East Sands Urban Design Framework (2010) apply.

2.6.2 Concerns have been raised regarding the access to the site. The proposed development would consist of the erection of five three-bedroom dwellings, with each dwelling having two off-street parking spaces. Vehicular access to the site is proposed to be taken directly through the existing, currently gated access, onto Balfour Place/The Shore. The existing gate in the archway will be left open at all times and a retractable bollard will be located inside the gate on land within the ownership of the applicant. The applicant has full rights of pedestrian, vehicular and services access through the archway at all times. The existing gates were installed by Scottish Gas Network, the current owner of the application site and therefore they have control of the gates, so they would never be closed without consent of the application site owner as that right will transfer with ownership of the property. With regards to the application site itself, the access will come along to the North of the development site, to be laid in permeable paving granite setts. This access lane will allow for access to the off-street parking areas for each dwellinghouse and will accommodate the turning manoeuvres required by each vehicle.

2.6.3 Concerns have been raised regarding the impact on road safety. Figure 12 of the East Sands Urban Design Framework (2010) states that the archway onto Balfour Place should only provide pedestrian access only and only limited vehicular access may be possible, taken through grounds of St Leonards School and demonstrated through a Transport Assessment. Servicing must be taken through pedestrian access onto Balfour Place. Since this document was produced Transportation guidance has changed and given the small-scale nature of this proposal a Transportation Assessment is not required. Due to different landownership and given that the neighbouring land is used for educational purposes, its considered that the proposed access off Balfour Place is more acceptable than taking access through the school grounds. The proposal itself in terms of its layout, design and redevelopment of a brownfield site would improve the visual amenity of the site and given TDM support, the scheme it is considered to meet the overall objectives of the Design Framework and it is therefore acceptable to depart from what is set out in the East sands Urban Design framework (2010) regarding access

provision. The Transportation Development Management Team (TDM) was consulted and raised no objections apart from initial concerns regarding bin provision. Sufficient parking is provided on site to meet the relevant parking guidance for a proposal of this size. Sufficient parking is provided on site to meet the relevant parking guidance for a proposal of this size. With this amended information TDM have no objections to this application subject to conditions regarding bin locations, driveway material and off-street parking.

2.6.4 With regards to construction works traffic, the applicant has submitted a construction methodology plan which states that construction works would be restricted to daytime hours (8am-5pm Monday-Friday and 8am-1pm Saturday). Vehicles entering the site will be limited to narrow tracked barrows and diggers with no large lorry deliveries. The area in front of the gateway will be fenced off for loading and deliveries. Off site preparation of components and materials will be organised to ensure easy access to site. In terms of the existing parking spaces either side of the archway, there would be no difference between the existing situation and proposed. There is adequate access through the gate for vehicles to service the site, which gain access between the parking spaces positioned either side of the gateway without effecting their proper use.

2.7 Flooding and Drainage

2.7.1 The relevant provisions of NPF4 policy 22 and FIFEplan Policies 1 and 12 apply. Fife Council's Design Criteria Guidance on Flooding and Surface Water Management Plan Requirements (2022) also applies.

2.7.2 Fife Council has no recorded incidents of flooding on this site whilst the SEPA map shows that the proposed location is not susceptible to flood risk. A flood risk assessment was therefore not required. The development is of a size that will require to be served by a SuDS scheme.

2.7.3 Fife Councils Structural Service were consulted on this application and initially requested further details in terms of surface water management proposals. The applicant provided further information on this in terms of a drainage plan and the underground storage attenuation capacity. This further drainage information that has been submitted in support of the application fully addresses the relevant guidance. The proposed development, therefore, incorporates sufficient measures to ensure that it is served by adequate infrastructure and services relating to surface water management. Fife Councils Structural Services have been consulted on this application and have raised no concerns. The proposal would, therefore, be acceptable and would comply with the Development Plan in this respect.

2.8 Contamination

2.8.1 The relevant provisions of NPF4 policy 14, FIFEplan Policies 1 and 10 and the East Sands Urban Design Framework (2010) apply.

2.8.2 Concerns have been raised regarding the site investigation report that was submitted by the applicant. Figure 12 of the East Sands Urban Design Framework (2010) states that ground contamination may be an issue on the application site. The applicant submitted an initial ground investigation assessment as part of this application. Fife Councils Land & Air Quality team assessed this and requested that an updated site-specific risk assessment be undertaken and submitted. The applicant subsequently submitted an updated Environmental Assessment along with a remediation strategy for the site. Fife Council's Land & Air quality team assessed the updated report and concurred with the findings of this report and have no objections to the application subject to conditions regarding remedial actions being completed in accordance with the Remedial Statement that has been submitted as part of the application. SEPA were also consulted as part of this application given the proximity to the coastline. The updated Environmental report concluded that there would be a low risk to the water environment, SEPA

concluded with the findings of this report subject to the actions set out in the remedial statement being undertaken.

2.9 Trees

2.9.1 The relevant provisions of NPF4 policies 1 and 3 and FIFEplan Policies 1 and 13 apply. East Sands Urban Design Framework (2010) and Making Fife's Places Supplementary Guidance (2018) also applies.

2.9.2 Figure 12 of the East Sands Urban Design Framework (2010) states that the line of semi mature trees on site should be retained, however these trees were removed as part of application 21/02962/TCA. Through this application the applicant is proposing to replace this lost tree belt through the planting of trees and shrubs along the northern boundary. A draft condition for a landscaping plan to be submitted has been included for Member's consideration should they resolve to approve the application in line with the Service recommendation.

2.10 Archaeology

2.10.1 Policy 7 of NPF4 and Policies 1 and 14 of the LDP apply.

2.10.2 Concerns have been raised regarding disturbance of the environment in this area given its historical importance. The site lies within the conservation area, within the area designated as St Andrews Archaeological Area of Regional Importance and within the area statutorily protected as the scheduled ancient monument: St Andrews Cathedral and Priory and adjacent ecclesiastical remains (SM13322). The site is considered to be potentially archaeologically sensitive, with the possibility of significant deposits and structure of medieval date existing on site. Historic Environment Scotland initially objected to this application due lack of information on the potential direct impact on the above scheduled monument. The applicant submitted an Archaeological Evaluation Data Structure Report. This report finding stated that subsequent excavations of these areas found that no in situ archaeological remains or deposits had survived to the depth of the proposed building foundations. On review of this report HES have withdrawn their objection. Fife Council's Archaeology Officer was consulted on the application to assess the impact the proposed development would have on any archaeological or heritage issues within the application site. Given the location of the application site, it is deemed that the works proposed could have the potential to disturb in situ medieval archaeological deposits. A condition is therefore recommended, if the application was to be approved, for archaeological works to be undertaken.

2.10.3 In conclusion, the proposed development has the potential to impact on archaeological deposits. A condition is therefore included in the recommendation to ensure a scheme of archaeological works be undertaken prior to the commencement of development.

2.11 Low Carbon

2.11.1 The relevant provisions of NPF4 policies 1, 2 and 14 and FIFEplan Policies 1, 3 and 11 apply. Fife Council's Low Carbon Supplementary Guidance (2019) is also relevant here.

2.11.2 Applicants are expected to submit a Low Carbon Sustainability Checklist in support. The applicant has submitted a low carbon statement as part of the planning statement which states that the new build is designed to have 2 ev charging stations, solar photovoltaic panels, sedum roofs, greywater systems with each dwelling having high-specification insulation and triple glazing.

2.11.3 As such, it is considered that the proposed development accords with the above provisions of policy and guidance in relation to low carbon.

2.12 Houses in Multiple Occupation

2.12.1 The relevant provisions of FIFEplan policy 2 apply.

2.12.2 The proposal is not intended for HMO use at this time and a suitable condition is recommended to ensure that the property will not be used as an HMO in the future unless a further application for that use is submitted for consideration.

3.0 Consultation Summary

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| Community Council | No comment |
| Structural Services - Flooding, Shoreline and Harbours | No objection |
| Historic Environment Scotland | Initial objection. Objection subsequently removed. |
| Archaeology Team, Planning Services | No objection subject to conditions |
| TDM, Planning Services | No objection subject to conditions |
| Land And Air Quality, Protective Services | No objection subject to conditions |
| Urban Design, Planning Services | No objection |
| Scottish Water | No objection |

4.0 Representation Summary

4.1

7 objection, 3 supporting comments and one general comment received.

4.2 Material Planning Considerations

4.2.1 Objection Comments:

| Issue | Addressed in Paragraph |
|--|------------------------|
| a. Principle of Development | 2.2.2 |
| b. Impact on Built Heritage | 2.3.2 |
| c. Impact on Residential amenity (noise/light) 2.4.3/2.4.4 | |
| d. Impact on residential amenity (overlooking) | 2.4.6 |
| e. Impact on residential amenity (bins) | 2.4.9 |
| f. Garden ground | 2.5.2 |
| g. Impact on road safety (access) | 2.6.2 |
| h. Transportation (not conforming with East Sands Urban Design | 2.6.2 |

| Issue | Addressed in Paragraph |
|---|------------------------|
| Framework) | |
| h. site investigation report | 2.8.1 |
| i. Impact on historical importance of site. | 2.10.1 |

4.2.2 Support Comments

| Issue | Addressed in Paragraph |
|-----------------------------|------------------------|
| a. Principle of Development | 2.2.2 |
| b. Design of Dwellings | 2.3.2 |

4.2.3 Other Concerns Expressed

| Issue | Comment |
|--|--|
| a. Concerns regarding the naming of the application site | Comments noted. The naming of any new development comes post approval and is not part of the planning application process. |
| b concerns regarding who will purchase these dwellings | Comments noted; however, these are not a material planning consideration in the assessment of this planning applications. |
| c. Concerns have been raised regarding works taking place outwith the site boundary. | The applicant has confirmed that no works will take place outwith the red line boundary. |

5.0 Conclusions

This full planning application for the erection of 5 dwellinghouses is deemed acceptable in terms of both scale and design. Furthermore, the design of the dwellinghouses is considered to represent the use of high-quality contemporary architecture which would create a visual enhancement to this brownfield site. Additionally, there would be no significant impact on existing levels of residential amenity. In light of the above, the proposal would be deemed to preserve the character of the surrounding St Andrews Conservation Area, and as such, comply with FIFEplan 2017 policies and other related guidance. The application is therefore recommended for conditional approval.

6.0 Recommendation

It is accordingly recommended that the application be approved subject to the following conditions and reasons:

CONDITIONS:

1. The development to which this permission relates must be commenced no later than 3 years from the date of this permission.

Reason: In order to comply with the provisions of Section 58 of the Town and Country Planning (Scotland) Act 1997, as amended by Section 32 of The Planning (Scotland) Act 2019.

2. BEFORE ANY WORKS START ON SITE, the developer shall secure the implementation of a programme of archaeological work in accordance with a detailed written scheme of investigation which has been submitted by the developer and approved in writing by this Planning Authority.

Reason: In order to safeguard the archaeological heritage of the site and to ensure that the developer provides for an adequate opportunity to investigate, record and rescue archaeological remains on the site, which lies within an area of archaeological importance.

3. BEFORE ANY WORKS COMMENCE ON SITE, exact details of the protection measures for the abbey precinct wall and the arch during the construction period, shall be submitted for approval in writing by this Planning Authority. Thereafter the development shall be carried out in accordance with these approved details.

Reason: In order to safeguard the built heritage assets of the site.

4. NO BUILDING SHALL BE OCCUPIED UNTIL remedial action at the site has been completed in accordance with the Remedial Action Statement approved pursuant to condition. In the event that remedial action is unable to proceed in accordance with the approved Remedial Action Statement - or contamination not previously considered in either the Preliminary Risk Assessment or the Intrusive Investigation Report is identified or encountered on site - all development work on site (save for site investigation work) shall cease immediately and the planning authority shall be notified in writing within 2 working days. Unless otherwise agreed in writing with the local planning authority, development works shall not recommence until proposed revisions to the Remedial Action Statement have been submitted by the developer to and approved in writing by the planning authority. Remedial action at the site shall thereafter be completed in accordance with the approved revised Remedial Action Statement. Following completion of any measures identified in the approved Remedial Action Statement - or any approved revised Remedial Action Statement - a Verification Report shall be submitted by the developer to the local planning authority.

Unless otherwise agreed in writing with the planning authority, no part of the site shall be brought into use until such time as the remedial measures for the whole site have been completed in accordance with the approved Remedial Action Statement - or the approved revised Remedial Action Statement - and a Verification Report in respect of those remedial measures has been submitted to and approved in writing by the local planning authority.

Reason: To provide satisfactory verification that remedial action has been completed to the planning authority's satisfaction.

5. IN THE EVENT THAT CONTAMINATION NOT PREVIOUSLY IDENTIFIED by the developer prior to the grant of this planning permission is encountered during the development,

all development works on site (save for site investigation works) shall cease immediately and the planning authority shall be notified in writing within 2 working days.

Unless otherwise agreed in writing with the local planning authority, development work on site shall not recommence until either (a) a Remedial Action Statement has been submitted by the developer to and approved in writing by the planning authority or (b) the planning authority has confirmed in writing that remedial measures are not required. The Remedial Action Statement shall include a timetable for the implementation and completion of the approved remedial measures. Thereafter remedial action at the site shall be completed in accordance with the approved Remedial Action Statement. Following completion of any measures identified in the approved Remedial Action Statement, a Verification Report shall be submitted to the local planning authority. Unless otherwise agreed in writing with the planning authority, no part of the site shall be brought into use until such time as the remedial measures for the whole site have been completed in accordance with the approved Remedial Action Statement and a Verification Report in respect of those remedial measures has been submitted by the developer to and approved in writing by the local planning authority.

Reason: To ensure all contamination within the site is dealt with.

6. BEFORE WORKS COMMENCE ON SITE a scheme designed to mitigate the effects on sensitive premises/areas (i.e. neighbouring properties and highway) of dust, noise and vibration from the construction of the proposed development shall be submitted to the Planning Authority for approval. Upon approval all matters detailed in the scheme shall be carried out in accordance with the scheme unless otherwise agreed in writing by the Planning Authority

Reason: In the interests of safeguarding the amenity of adjoining and nearby residents.

7. BEFORE ANY WORKS START ON SITE, details of the future management and aftercare of the proposed landscaping and planting shall be submitted for approval in writing by this Planning Authority. Thereafter the management and aftercare of the landscaping and planting shall be carried out in accordance with these approved details.

Reason: In the interests of visual amenity; to ensure that adequate measures are put in place to protect the landscaping and planting in the long term.

8. Prior to the occupation of any of the proposed dwellinghouses, the refuse bin storage area shall be provided within the red line boundary of the site as shown on Page 23 of the document entitled Design, Access & Heritage Statement (23 - DESIGN STATEMENT PART 2) and thereafter, this agreed site shall be used for this purpose. For the avoidance of doubt, no delineated 'drop off' zone is permitted on any area of the public highway, outside the archway or the development site.

Reason: In the interest of road safety; to ensure that no use of the public highway takes place for the purpose of any servicing, bin collections and deliveries and to ensure that there are no unnecessary obstructions on the public highway.

9. Prior to the occupation of the first dwellinghouse, the first two metres length of the private access to the rear of the public road - Balfour Place/The Shore - shall be constructed in a paved material (not concrete slabs).

Reason: In the interest of road safety; to ensure that no deleterious material is dragged on to the public road.

10. Prior to the occupation of each dwelling, off street parking shall be provided for that dwelling, as shown on the submitted plan; 02 Block Plan. The parking spaces shall be retained throughout the lifetime of the development for the purposes of off-street parking.

Reason: In the interests of road safety. To ensure the provision of an adequate off street parking facilities.

11. The residential units provided on site shall be used solely as residences for (a) a single person or by people living together as a family; or (b) not more than 5 unrelated residents living together in a dwellinghouse; or (c) not more than 2 unrelated residents living together in a flat. For the avoidance of doubt, none of the residential units hereby approved shall be used for Housing in Multiple Occupation.

Reason: In the interests of maintaining a mixed and balanced housing stock as required by Adopted FIFEplan - Fife Local Development Plan Policy 2 (Homes) or any subsequent revision or amendment of this document.

7.0 Background Papers

In addition to the application the following documents, guidance notes and policy documents form the background papers to this report.

[National Planning Framework 4 \(2023\)](#)

[FIFEplan Local Development Plan \(2017\)](#)

[Planning Guidance](#)

National Guidance

Sections 59 and 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997

Historic Environment Scotland Policy Statement (June 2016)

Historic Environment Scotland's Managing Change in the Historic Environment (2010)

PAN 1/2011: Planning and Noise

Development Plan:

NPF4 (2023)
FIFEplan Local Development Plan (2017)
Making Fife's Places Supplementary Guidance (2018)
Low Carbon Fife 2019

Other Guidance:

Fife Council Planning Customer Guidelines - Garden Ground (2016)
Fife Council Planning Customer Guidelines - Daylight and Sunlight (2022)
Fife Council Planning Customer Guidelines - Minimum Distances between Window Openings (2011)
St Andrews Conservation Area and Management Plan (2013)
St Andrews Design Guidelines (2007)
East Sands Urban Design Framework (2010)

Report prepared by Scott McInroy, Chartered Planner Development Management

Report reviewed and agreed by Alastair Hamilton, Service Manager (Committee Lead) 1.9.24