

Protect Rural East Fife (PREF)

For the attention of
Planning Directorate
The Scottish Government
Planning Services Division

5 Osnaburgh Court
Dairsie
Fife
KY15 4SU

FINALISED FIFE STRUCTURE PLAN 2006-2026 REAPPRAISAL OF HOUSING LAND REQUIREMENT PROPOSED MODIFICATIONS

The members of Protect Rural East Fife (PREF) wish to object to this reappraisal.

REAPPRAISAL PROCESS

The consultation to Fife Council in 2007 appears to have been flawed. Reports on the consultation were effectively not available to Councillors for the Planning and Fife Council meetings in December 2007. Developers were allowed three or more pages to promote their ideas, and were also able to lodge two, three or four separate representations, whereas Comments from residents were “reduced” by Development Services. Also in some cases Comments from residents were masked by excessively long Responses from Development Services.

Examples of Developer proliferation are:

ID 21133. The Barton Willmore Partnership on behalf of Stirling Developments Ltd. Philip Clarke – nearly 5 pages.

ID 21194. TMS on behalf of Richmond Homes Malcolm Smith Gowkhall – more than 4 pages.

ID SPHR055 Hargest & Wallace Planning Ltd. on behalf of MacDonald Estates Keith Hargest Edinburgh – three and a half pages.

ID SPHR071 White Young Green Planning Joanne Plant Edinburgh – three and three quarter pages.

ID SPHR073 Hargest & Wallace Planning Ltd. on behalf of Robertson Homes Ltd. Bryan Wallace Edinburgh – three and a half pages.

ID SPHR075 Hargest & Wallace Planning Ltd. On behalf of National Grid Property Ltd. Bryan Wallace Edinburgh – three pages.

In contrast, Dr. Goudie’s 9 page letter on behalf of St. Andrews Community Council was reduced to two-thirds of a page.

It is therefore difficult to accept Fife Council’s assertions when it says, for example, that “a greater number of respondents were in favour of.....”

Par. 4.1 in the Proposed Modifications states that “A significant level of response considered that the Council should be planning for 9% population growth. An almost equal level of response favoured 5%; some provided written comments (our underlining) that 5% was too high....etc.” Why are such words as “significant” and “some” used rather than figures’? It was not possible to find, in the Comments on the Reappraisal to Fife Council, any support from residents in the wards of the two Councillors pressing for 9% growth.

Surely ALL the comments were provided in writing? The careful wording of this paragraph does not convince us that the views of “residents and representatives of community groups” are being accurately recorded, whereas those of developers are over-represented.

STRATEGIC DEVELOPMENT AREAS

The name of these areas has now been changed to “Strategic Land Allocation”. On p.6 of the report on “Proposed Modifications” there is an explanatory paragraph which is, to put it bluntly, incomprehensible.

But on p.30, under the heading “Modifications resulting from Strategic Environmental Assessment”, there is the following sentence; “Page 20, Policy SDA 1 “An integrated and phased masterplan for the development of the land will be prepared””. If the SDAs no longer exist, can an SDA policy exist? A sentence to be inserted reads ”Masterplans will accord with the Fife Masterplans Handbook, and take account of landscape capacity and flood risk studies”. Is this Handbook available to Ministers?

Would it not be best to take account of such important matters before Scottish Ministers consider approval? Is it correct to say that Masterplans will simply implement decisions? Will they include consultations with the public?

THE SETTLEMENT STRATEGY

“Seven Strategic Development Areas will contribute significantly to developing the Fife economy and enhancing communities... Largely these developments will be on Greenfield land.....”

In pursuance of this strategy the following phrases are included in the modifications;

“Dunfermline will be expanded, growing out through development....around a revitalised city centre....”

“Kirkcaldy will be expanded as the main centre at the heart of Mid Fife over the next twenty years....”

“Kirkcaldy East – expansion to the east will commence early in the Plan period from 2007 with 2,500 new houses....”

“Lochgelly will be expanded to provide land for 1,700 new houses...”

Cupar – “The Structure Plan seeks to consolidate its role as the service centre for a large part of rural East Fife....”

St. Andrews – “The strategy is to realise the potential of St. Andrews as an economic driver for the whole of Fife....”

The above examples make it clear that this Structure Plan is being imposed on Fife.

The Strategic Development Areas were included in the second draft of the Structure Plan without consultation, and have been retained without any regard being paid to the many objections on this subject. This is artificial expansion, of a scale previously unknown to Fife. The details of expansion are explicit, the details of the necessary infrastructure are not.

LANDSCAPE REVIEW

Fife Council is currently carrying out a landscape review of landscape designations in Fife. Presumably the Housing Land Requirement is based on, and takes into account the present AGLV designations, along with the Tyldesley Landscape Assessments, the Alison Grant Landscape Capacity Assessments, and (for Dunfermline and St. Andrews) the Green Belt policy SS8 in the Approved Structure Plan 2002. As this is a Fife-wide assessment, we wonder why it was not included in the Draft Structure Plan, and whether it will be possible to change horses in mid-stream, if the present designations are altered.

SCOTTISH NATURAL HERITAGE

In a comment dated 13 September 2007 on the Housing Land Reappraisal, SNH maintain their objection to the Structure Plan and say that in deciding on the SDAs “there has been too little consideration taken of environmental constraints”, and SNH is not satisfied that Local Plan policies “will be a sufficient mechanism to safeguard the natural heritage”.

In a letter dated 12 October 2007, SNH say “I have no comments to offer on the methodology used, other than to note that the results of the assessment do not appear to reflect the methodology used”. And “The assessment of the St. Andrews SDA does not identify the role of the proposed Green Belt...rather, the information provided appears to be a justification of these measures, which is inappropriate in an environmental statement”.

HISTORIC SCOTLAND

This Government agency is also maintaining its objection to the Structure Plan, and states in commenting on the Housing Land Reappraisal on 10th October 2007; “We are therefore concerned that the assessments within the SEA are simply being used to justify, rather than inform, the Structure Plan policies and SDAs...”

STATISTICS

Mr. Jobling (Scottish Government) in his comment on the Reappraisal points out several statistical errors. So does Dr. Goudie (St. Andrews Community Council). Few of us would be able to comment with anything near their authority, but there has been considerable doubt among residents about many figures in the Structure Plan since it was first published, and the Reappraisal continues to fuel these doubts.

STRATEGIC ENVIRONMENTAL ASSESSMENT

An article in the Dundee Courier (14.02.08) states that the Scottish Government has granted an exemption to Fife Council over parts of the Structure Plan produced before last May. The article states that work began on this Plan in “2002”. In fact newspaper advertisements about the new Plan were published at the end of January 2003. What is the official date of the start of the new 20-year Plan? If, as the SEA gateway Office suggests, it was started “early in 2002”, we wish to know whether it is legal to start a new Plan before approval of the previous one, without the knowledge of the public.

The Approved Structure Plan (2002) states that “a review of the Structure Plan will be undertaken prior to 2006”! The new plan apparently pre-empted this requirement.

David May (Chairman)

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