

# Crail Local Place Plan

## Consideration of relevant planning policy

### 1. Amendments to FIFEplan

Regulation 5 (1) (e) of the Town and Country Planning (Local Place Plans) (Scotland) Regulations 2021 requires the community body submitting a local place plan to a local planning authority to provide a statement setting out why the community body considers that the local development plan should be amended. As noted in the analysis below, the Crail Local Place Plan adopts and supports the Local Development Plan for Fife (FIFEplan) and the objectives of the Crail LPP are to provide detail and focus to the FIFEplan policies. On that basis, the Crail LPP should inform and become part of the new Local Development Plan for Fife.

In terms of changes there are four areas where the Crail LPP suggests a different approach to current FIFEplan policy. These are:

- In the context of new housing, the Crail LPP advocates the use of planning obligations and other constraints limiting its use for non-permanent occupancy. Such constraints are not expressed in FIFEplan Policy 4 or elsewhere. The justification for this is because historically the percentage of properties which are second homes or holiday lets in the Crail LPP area is very high and new housing developments continue to lose permanent housing in favour of housing which is only occupied for short periods or holidays. The impact of this on the housing market in Crail tends to exclude local people and those who could otherwise be employed in the Crail LPP area.
- In the context of affordable homes, whilst the Crail LPP area is within the requirement for 30% of new build homes to be allocated as affordable (see “Affordable Housing Supplementary Guidance”), because of the pressure on the housing market from second homes and holiday lets resulting in a severe lack of housing for local people (with a knock-on effect on employment and the economy generally) consideration should be given to increasing the affordable home requirement percentage generally or on a site by site basis.
- At Crail North, where the site boundary for this development evolved from a considerably lower number of housing units than the now allocated 320, consideration could be given to taking a flexible approach to the northern and eastern boundaries to allow the density of the housing units in particular to be reduced. This reflects the increased number of units which were specified in the adopted FIFEplan and also the provisions of the development framework outlined in the Crail LPP which seeks to provide new homes with “high environmental standards, at medium to low density, and have suitably-sized gardens and plenty of communal green space.”
- At Crail North and Crail Airfield, the Crail LPP does not depart from the allocation/policy requirements but provides considerably more detail including a clearer solution for the new vehicular accesses required and a specific requirement, at Crail Airfield, for a traffic calming and safety scheme along the existing site access (Marketgate, Denburn Narrows and Balcomie Road).The reason for this approach is set out in detail in the Crail LPP.

### 2. Introduction – having regard to relevant planning policy

Regulation 5 (1) (d) of the Town and Country Planning (Local Place Plans) (Scotland) Regulations 2021 requires the community body submitting a local place plan to the local

planning authority to provide a statement explaining how the community body, in preparing the local place plan, has had regard to the relevant planning policy for the local place plan area. In the case of the Crail Local Place Plan the relevant policy is contained in:

National Planning Framework 4 – the National Spatial Strategy for Scotland published in 2023

The FIFEplan – the Fife Local Development Plan 2017 (including Supplementary Guidance)

We have also considered the North East Fife Community Plan 2019 to 2022 and the North East Fife Local Strategic Assessment 2022. Whilst neither of these directly addresses land use planning they do summarise the aspirations of the community (which are reflected within the Crail community and the Crail LPP) and contain statistics and analysis of performance/outcomes for the local areas. The statistics and trends noted in the Crail LPP are sourced from these documents.

In summary, the Crail Community Partnership had careful regard to these policy documents and can confirm that the proposals in the Crail Local Place Plan are consistent with them and are supported by them. It is not the task of the Crail LPP to restate policy requirements in national and local authority documents. The commentary below demonstrates firstly that Crail Community Partnership has indeed had regard to this planning policy but also to show how it seeks to embrace and promote the existing planning policy which is relevant to the Crail LPP area.

### **3. General Policy Requirements**

As a general principle, the Crail Local Place Plan supports the Spatial Principles of NPF4, particularly, just transition, conserving and recycling assets, local living and rural revitalisation. In terms of Policy 1, the Crail LPP is consistent with and supportive of the need to respond to the global climate and nature crises. The Crail LPP itself comprises a local, community-led statement of aspirations for Crail, in accordance with the new emphasis on community-led planning.

The Crail Local Place Plan will directly inform the new Local Development Plan. As such it addresses both site-specific policies in the adopted FIFEplan as well as the general policies.

#### ***Crail LPP - Green Space and the Environment***

*The natural areas within the Crail LPP area should be preserved and enhanced. These include the extension of the green corridor through the Crail North site and to Denburn Park and Roome Bay. A network of green corridors for pedestrians and cyclists should be provided and preserved.*

#### **NPF4**

The Crail LPP engages with National Development 8, the Scotland-wide National Walking, Cycling and Wheeling Network, by seeking to develop active routes (including maintenance and improvement of the Coastal Path). In accordance with Policy 4 (Natural Places) and Policy 5 (Soils) it seeks the protection and enhancement of natural areas and agricultural land. The Crail LPP proposes the maintenance and enhancement of green areas for leisure and sports in accordance with Policy 21 (Play recreation and sport) and the creation of nature networks and the connections between them (eg Denburn Wood) in accordance with Policy 3 (Biodiversity).

#### **FIFEplan**

The policies and proposals for Crail note that, with the exception of Crail Airfield, no major new development allocations are proposed. Policy 1 (Development Principles) part B notes

the need to protect sport and recreation and to safeguard the character and qualities of the landscape. Policy 7 (Development in the Countryside) supports the protection of existing agricultural land.

Policy 13 (Natural Environment and Access) requires development to “protect or enhance natural heritage and access assets” These include green spaces, green networks and core paths. All of these objectives are reflected in the Crail LPP.

#### ***Crail LPP - Town Centre***

*Business activity should be focussed within the Town Centre. New development should complement, not compete with, the Town Centre. The pedestrian environment and parking management should be improved.*

#### **NPF4**

In accordance with Policy 15 (20 minute neighbourhoods) the Crail LPP seeks to preserve and enhance the existing town centre in Crail to provide local amenities (businesses, retail, health, green areas etc) and sustainable connections from new developments. Proposals for waste facilities to be improved, especially in the context of new development, accords with Policy 12 (Zero waste). Policy 27 (City, town, local and commercial centres) supports the Crail LPP objective to make sure development complements, rather than competes with, the town centre.

#### **FIFEplan**

Policy 1 Part B identifies that town centres should be the “first choice for uses” which involve retail, business and leisure. This again accords with Crail LPP’s emphasis on the need to complement, not compete with, the existing centre.

#### ***Crail LPP -Business and Tourism***

*The development of new small business units should be encouraged. The mobile phone signal should be improved to encourage the business environment. Facilities for visitors including toilets (particularly at Roome Bay), signage and parking should be provided and improved.*

#### **NPF4**

The Crail LPP acknowledges the provision of high quality digital infrastructure if business and community life is to thrive in the Crail LPP area. This accords with Policy 24 (Digital infrastructure). The Crail LPP acknowledges the importance of tourism and reflects the objective of Policy 30 (Tourism) to “support the recovery, growth and long-term resilience of the tourism sector”. Policy 27(City, town, local and commercial centres) emphasises the need to enhance and keep business in Crail.

#### ***Crail LPP -Harbour***

*Facilities for fishing businesses and tourists should be improved. Provision should be made for leisure craft and small businesses. Strict traffic management measures should be introduced.*

#### **NPF4**

The comments on commercial and tourism policies above apply equally to Crail Harbour, as do the objectives of retaining, enhancing and using the historic built environment (Policy 7) and providing and improving facilities for leisure and tourism.

#### **FIFEplan**

Policy 1 B seeks to safeguard the characteristics of the historic environment including archaeology. Policy 14 (Built and Historic Environment) gives special emphasis to the need

to protect and enhance the historic environment. These policies protect and support the historically important Crail Harbour,

***Crail LPP - Community Buildings and spaces***

*The development of existing community buildings should be encouraged including changes of use, building alterations etc as required. New community buildings should be identified and provision made for new/replacement facilities such as a doctor's surgery, post office and library. More use should be made of parks and green areas with children's play facilities improved. Recycling and waste facilities should be provided and upgraded.*

**NPF4**

As referred to in Policy 9 (Brownfield, vacant and derelict land and empty buildings) and Policy 7 (Historic assets and places) the Crail LPP endorses the reuse of old sites and existing buildings with planning flexibility to give them new life. In addition the objectives of Policy 25 (Community wealth building) form a significant driver for the Crail LPP objectives and the preservation, use and enhancement of new and existing community assets should form part of the planning considerations for proposals for the development and use of community land and buildings.

**FIFEplan**

As noted above Policy 1 Part B seeks to safeguard the historic environment. Policies relating to the town centre are also relevant here as the community buildings tend to be centrally located.

***Crail LPP - Roads, footpaths, cycle routes and parking***

*Pedestrian and cycle routes (including the Coastal Path) within the LPP area should be expanded and improved with links made to the wider network. Public transport options should be enhanced. The 20 mph temporary speed limit should be made permanent. New access roads and traffic management schemes associated with new development (notably Crail North and Crail Airfield) should be provided. An off-centre car park should be provided for visitors.*

**NPF4**

The Crail LPP embraces Policy 18 (Infrastructure first) in that, in the context of any new development within the Crail LPP area, transport infrastructure which is necessary to deal with adverse impacts of the new development and which provides accessible and sustainable transport connections, which are safe and healthy, must be in place before the development proceeds. Development proposals must pro-actively make provision for associated transport infrastructure and this must be enforceable via planning conditions, obligations or other agreements. In addition the Crail LPP also reflects Policy 13 (Sustainable transport) in a number of ways including the provision of out of centre parking to improve the amenity of Crail town centre generally.

**FIFEplan**

Policy 1, Part B makes reference to the need for new development to mitigate against the loss of infrastructure capacity by providing additional capacity or otherwise improving infrastructure. This accords generally with the "Infrastructure First" approach and the Crail LPP requirements for new roads and road improvements at Crail North and Crail Airfield. Policy 4 (Planning Obligations) makes it clear that impacts on infrastructure caused by development will need to be mitigated. That infrastructure includes "transport, schools, affordable housing, greenspace, public art and employment land".

Policy 10 (Amenity) states that developments which will cause loss of amenity will not be permitted unless that loss is mitigated. "Amenity" in this context includes "traffic movements" and "construction impact".

***Crail LPP - New Development – general principles***

*The objectives set out above should be incorporated within new development proposals. Roads and paths should reflect an open network and new roads should be designed to prevent rat-running. Development should be phased to allow the impact on Crail to be sustainable.*

**NPF4**

The Crail LPP embraces the principals of Policy 14 (Design, quality and place) for all new development in the Crail LPP area. The six qualities for successful places (healthy, pleasant, connected, distinctive, sustainable and adaptable) are all relevant for any new development. In the context of Crail North and the Crail Airfield developments, the Crail LPP has outlined some specific requirements including incorporation of green lanes, connections with the town centre etc.

**FIFEplan**

Policy 3 (Infrastructure and Services) makes it clear that new development must be served by adequate infrastructure and services including "safe access routes" and this should be provided on the basis of a timetable for delivery. Waste management will be a necessary part of the infrastructure and services to be provided.

Policy 14 adopts the six qualities of successful places to the built and historic environment (with details in Supplementary Planning Guidance "Making Fife's Places" 2018). The objectives of the Crail LPP support and apply those principles to Crail. The number of units now designated for this site could indicate the need to expand the site boundaries if all these qualities are to be incorporated.

***Crail LPP - Housing – new development***

*New housing should make provision for affordability, and accessibility .Design should be high quality and sustainable. Innovative solutions should be considered (eg self-build). Restrictions on sale/use should be imposed to limit numbers of second homes and holiday homes.*

**NPF4**

The Crail LPP supports in particular the provisions of Policy 16 (Quality homes) and the emphasis on providing a variety of types of home (including affordable housing). The Crail LPP contains requirements on the need for new housing to provide permanent homes rather than second homes or holiday homes if the need for housing local people is to be met. This reflects the particular pressure on the housing market in the Crail LPP area.

**FIFEplan**

Policy 2 (Homes) notes the need for "good access to community facilities" and also that affordable housing does not include holiday accommodation, mobile homes and rural huts. Affordable homes need to be permanent homes. The Crail LPP supports those objectives. In terms of numbers of affordable units to be provided, we have noted that Crail has a requirement (per the Affordable Housing Supplementary Guidance) of 30% of units. The Crail LPP suggests that consideration should be given for an even higher percentage within the Crail LPP area given the unaffordability of housing in Crail.

Policy 4 (Planning Obligations) makes no reference to planning obligations being a potential tool to retain new housing in permanent ownership and occupation (as opposed to second

homes and holiday lets). The Crail LPP recommends the use of planning obligations in this context together with other suitable constraints limiting the use of homes for non-permanent occupation.

#### **Crail LPP - Crail North**

*The general principles set out above should be included. Provision should be made for green spaces, suitable gardens and the extension of green lanes, with new cycle and pedestrian routes into the Town Centre. A new primary access road should be provided from St Andrews Road (preferably via a new roundabout at Cupar Road end) with a new secondary access to the east of Balcomie Links Caravan Park.*

#### **NPF4**

The Crail LPP applies the general principles set out above to the development at Crail North. Of particular significance are the requirements of Policy 18 (Infrastructure first) and those policies in the NPF which seek to promote sustainable routes and connectivity with the town centre (notably Policy 15 – 20 minute neighbourhoods). In addition the requirements of Policy 14 (Design, quality and place) should allow the possibility of boundary adjustments to accommodate the number of housing units permitted.

#### **FIFEPlan**

The allocation for Crail North(CRA02) includes a number of requirements for the development on this site. These include housing of “high quality” with “a mixture of tenures” Generally this development should not “negatively impact on the vitality and viability of the village centre”. Fife Council has stated that the Crail LPP will directly inform the required Development Framework which will be required when proposals come forward. The Crail North site includes the policy proposals for the green lane routes around Crail and any new development will need to protect those routes. The Crail LPP supports these objectives for this site as well as the general principles for new development set out in the Crail LPP, for example the need for affordable housing. It also adds some further provisions. Firstly, because the number of units permitted has been increased since the site was originally identified for development, consideration should be given to expanding this site on its northern and eastern boundaries to allow for flexibility in the layout of the housing and supporting development. The other main issue is the need to provide a new access road from St Andrews Road and the community’s preference for a second access to the east of Balcomie Links Caravan Park.

#### **Crail LPP - Crail Airfield- current planning application**

*The general principles set out above should be included in the design brief. Provision should be made for green lanes connecting into the surrounding areas (notably the Kilminning Wildlife area) with provision of pedestrian ways and cycle paths. Prior to commencement of any development a new primary access should be provided to avoid the Town Centre and a programme of traffic calming measures should be implemented on the secondary Marketgate/Denburn Narrows and Balcomie Road route.*

#### **NPF4**

Again, the Crail LPP applies the principles set out above in the context of this development. Of particular relevance are Policy 18 (Infrastructure first) and those policies such as Policy 3 (Diversity) which relate to the preservation of natural assets. Transport links on this site are a particular concern in the context of the development complementing, not competing with, Crail town centre (Policy 27).

#### **Fife Plan**

The FIFEplan allocates this site (LWD 022) for uses which may include “outdoor events” and “existing and new employment uses” together with “commercial or leisure development and holiday accommodation” and “limited housing development”. The Crail LPP supports those possibilities and also endorses the emphasis on the need for conservation and repair work to existing buildings on the site and the need to deal sensitively with the natural environment. The allocation also states that development “should resolve site access issues from Crail to the airfield and Crail golf courses - an alternative route will be required.” The Crail LPP applies general principles for new development (for example the need to enhance Crail’s green spaces) and also sets out further detail relating to concerns over access requirements. These set out a requirement for the development to provide a new direct route into the site avoiding the town centre and for traffic calming and safety measures along the existing route via Marketgate, Denburn Narrows and Balcomie Road.

#### **4. Conclusions**

In conclusion and in response to Regulation 5 (1) (e) of the Town and Country Planning (Local Place Plans) (Scotland) Regulations 2021 we can confirm that the scope of the Crail Local Place Plan is to provide focus and detail to be taken into account when the new Local Development Plan for Fife is formulated. We have outlined above the four points which propose changes to the existing FIFEplan and introduce new significant requirements for development.

We can also confirm, in response to Regulation 5 (1) (d) of the Town and Country Planning (Local Place Plans) (Scotland) Regulations 2021, that in the production of the Crail Local Place Plan regard was had to the relevant planning policy for the Local Plan Area.

Crail Community Partnership

18 December 2023