

2023-101



EIA SCREENING REQUEST

Ben Jurin Architecture

CHANGE OF USE OF INDUSTRIAL LAND TO HOLIDAY LODGE / CARAVAN
PARK INCLUDING SITING OF CARAVANS AND CREATION OF PATH LINK
TO ADJACENT CYCLE PATH

Castlehill Mine, Brankstone, Blairhall Alloa Fife

8 December 2023



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*Gray Planning & Development Limited, Town Planning Consultants. Company No. SC568143
Member of the Royal Town Planning Institute No. 42566*

2023-101

11th December 2023

Fife Council
Planning Services
Fife House,
North Street,
Glenrothes, KY7 5LT

By email to: development.central@fife.gov.uk

Dear Sir/Madam

**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)
REGULATIONS 2017 (EIA REGULATIONS)**

EIA SCREENING REQUEST

**CHANGE OF USE OF INDUSTRIAL LAND TO HOLIDAY LODGE / CARAVAN PARK INCLUDING SITING OF
CARAVANS AND CREATION OF PATH LINK TO ADJACENT CYCLE PATH**

CASTLEHILL MINE, BRANKSTONE, BLAIRHALL ALLOA FIFE

We are instructed by Ben Jurin Architecture to submit this EIA Screening request, along with the completed Screening Request form and associated appendices. This request is made in accordance with Regulation 8 (1) of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (EIA Regulations).

The applicants have agreed a to purchase lands comprising the former Castlehill Mine. The site was previously a mine access site that served Longannet Power station with coal. The end of underground coaling in Fife has left this site as something of a relic of the area's mining heritage. While the site itself is brownfield in nature, it is surrounded by rolling mixed farmland and is bounded immediately to the south by the Millennium cycleway.

The site has been identified by Fife Council as a Brownfield Opportunity Site in historical development plans dating back over 15 years and is currently identified in FIFEplan (2017) the adopted local development plan as 'Other Proposal' (LWD032) and this allocation states that a housing allocation incorporating environmental principles is anticipated subject to detailed assessment. The allocation also advises that a development brief for Fife Council approval is necessary, whilst a flood risk assessment requires to be undertaken on the site. The allocation also sets out Green Network Priorities and these include:

- Deliver a high-quality pedestrian and cycle route from the site to the West Fife way (National Cycle Network) which runs along the southern boundary of the site.
- Take suitable measures to protect the areas of woodland and wetland to the south of the site and incorporate as part of a recreational green network. Deliver a high-quality development frontage onto this green network.
- Provide a minimum 10m buffer between the areas of wetland and woodland and any development.

Existing Conditions

All previous buildings on the site have been demolished and the site now comprises of concrete roads, hardstanding and grassed areas.

A circular road is located around the site, with the land falling to the south-west toward the Bluther Burn. The south-east of the site is elevated above most of the surrounding area where a settlement pond for mine waste



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was previously situated. This feature appears to have re-naturalised and is covered in grassland. The site is surrounded by a woodland belt area, while to the east a farmer's field rises steeply away from the site, limiting views into the site from the A907 to the east. The site is only glimpsed from the A907 through the former site entrance, as a row of hedges and trees exist along the rest of the road-side boundary.

A core path (R597 –Cycle Path) runs adjacent to the southern boundary of the site, whilst a fluvial flood risk area (1 in 10 year and 1 in 200 years as per SEPA's flood risk maps) is located to the west of the site. The site is located within the outer zone of the Muirside Depot Explosives Facility Hazardous Site Consultation zone, is on potentially contaminated land due to the former coal mining use of the site and the majority of the site is located within a coal mining low risk area, however, small parts of the site are within a coal mining high risk area. Most of the land within the site is classified as a built-up area as per the James Hutton Institute, however, a part of the woodland area to the south is classified as prime agricultural land. The woodland belt surrounding the site is not designated as ancient woodland, however, the woodland area located across the burn to the west is designated as an ancient woodland area (Castle Hill Long Established) as per NatureScot's maps. There are also no other significant natural or cultural heritage designations within the direct vicinity of the site, however, the Lockshaw Mosses SSSI is located approximately 651 metres to the north-east of the site, whilst the Castle Hill Enclosure Scheduled Ancient Monument is located approximately 553 metres to the west of the site. This proposal would have no significant impact on these designations due to the intervening woodland areas and distance involved, therefore, this pre-app response does not consider these matters further.

The proposed development area is bounded by further areas of the Castle Hill site to the south and west, agricultural grazing land to the east / northeast, the grounds of a dwelling to the northwest and a public highway to the north.

The site was a mine which was part of 4 other mines all connected together as part of the Longannet coal mine complex. The coal came to the surface at Longannet Power Station. This site was used purely to get people and materials down into the coal mine workings via two drift mine entries. Mines were walkable roadways with this mine having a 1 in 4 downward gradient.

One entry point acted as a main ventilation shaft and second entry point to the coal seam. Coal was removed via an underground conveyor to the nearby Longannet coal fired power station. The mine entries have been treated and capped on behalf of the Coal Authority and gas monitoring has confirmed no gas emissions have been identified which could lead to a significant risk of harm. The mines have been flooded and a static water level confirmed. All surface historic structures, the administration offices, air supply housing and winches have been removed. However concrete bases and internal road ways remain.

No minerals were brought up on this site, and The Coal Authority and Groundsure Search records confirm, "*the property is not within a surface area that could be affected by any past recorded underground coal mining*", i.e. the site has never been mined for coal.

The Bluther Burn watercourse runs adjacent to the site.

The site is accessed directly off the A907. The site has access to the National Cycle Network route 764.

The Proposal

The proposal is for a change of use of former industrial land to holiday lodge/caravan park including siting of caravans and creation of path link to adjacent cycle path. The proposal would provide up to 100 timber clad caravans with each caravan accessed via the service with decking and two off-street parking spaces provided for each caravan. The current proposal is for 92 units. The land to the south-east and westerly corners would be planted and formed with footpaths to provide access to the cycle path to the south. A small area of land on



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the north-west part of the site would remain open for potential visitor car parking. Landscaping around the site would include new tree belts and hedgerows with the existing trees to be retained.

A sustainable urban drainage system (SUDS) is proposed. A dedicated pedestrian/cycle connection to the West Fife Cycleway NCN Route 764 adjacent to the site is proposed. The provision of cycle hire facilities on site and also a concierge service for residents using (disabled-equipped access) minibuses to and from local transport services is proposed. In terms of landscape planting and mitigation with enhancements to biodiversity, it is proposed the development will include significant amounts of indigenous tree and hedge planting to the enhance sense of place in a rural environment, areas of open water, waterside planting, areas of long grass and a wide range of proposed shrub species selected in consultation with the Ecological recommendations to create varied habitat types. The landscape proposals also provide opportunity for local communities to enjoy the landscape with the introduction of a cycle track from the core path NCN Route 764 to the south of the site.

The proposed development layout will not require the removal of either significant groups or large numbers of individual trees. The only removal of established tree stock is a section of linear group G1 (circa 18m) in order to construct a visitor reception centre and associated car parking. This removal would not impact upon the retention of the overall group (circa 110m). Boundary groups G1 and G2 will be retained to provide established vegetation along the boundaries of the site. An area of G2 will require removal, there are no significant established trees in this section of the site with all trees being in the semi mature age class. The proposed development does not make any incursions into the main areas of woodland W1 with the proposed lodges / caravans located outside of the woodland and canopy line (based upon the topo survey).

The development in the western and southeast sections of the site will require the removal of areas of young Goat Willow and Silver Birch colonisation. These areas are not part of the main woodland blocks. They would not impact upon the retention of the overall woodland W1.

In relation to low carbon and renewable energy development, the proposal will include photovoltaic ground mounted or roof mounted (the feasibility of a wind turbine has not progressed owing to cost and to landscape and visual impacts), Air Source and Ground Source heating is identified as potential, and a heat recovery system in the new buildings is under consideration.

A formal Proposal of Application Notice (PAN) has already been submitted to Fife Council (reference . 23/02719/PAN).

Requirement for an EIA

The Proposed Development has been assessed against Schedule 1, 2 and 3 of the EIA Regulations.

The Proposed Development does not fall within the definitions of Schedule 1 of the EIA Regulations and is therefore not EIA Development by virtue of this schedule.

The Proposed Development does exceed the thresholds given in Schedule 2, Section 3(a) of the EIA Regulations by virtue of the area of the development exceeding 0.5 hectares. It is therefore required to be screened against the Schedule 3 criteria of the EIA Regulations to determine if the Proposed Development is likely to have significant effects on the environment.

The following sections therefore include an assessment against those criteria. These are supported by a pack of Appendices which cover all of the relevant environmental topics and which summarise the case for each matter.



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Table 1: Screening Request Requirements EIA Regulation Requirement	Comment
A description of the location of the development, including a plan sufficient to identify the land	See Project Description (overleaf) and Figure 1 attached.
<p>A description of the proposed development, including in particular:</p> <p>(i) A description of the physical characteristics of the proposed development and, where relevant, of demolition works; and</p> <p>(ii) A description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected</p>	<p>See Project Description for a description of the physical characteristics of the Proposed Development.</p> <p>There will be no demolition works as part of the construction of the Proposed Development.</p> <p>The location of the Proposed Development and specifically the sensitivity of the Proposed Development is discussed in Site Sensitivity section.</p>
A description of the aspects of the environment likely to be significantly affected by the proposed development.	See Table 2, Potential Effects.
A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from: (i) The expected residues and emissions and the production of waste, where relevant; and (ii) The use of natural resources, in particular soil, land, water and biodiversity	See Table 2, Potential Effects.
A request for a screening opinion may, in addition to the information required in accordance with paragraph 2), also be accompanied by a description of any features of the proposed development, or proposed measures, envisaged to avoid or prevent significant adverse effects on the environment.	See Table 2, Potential Effects.

Project Description

The Proposed Development consists of change of use of former industrial land to holiday lodge/caravan park including siting of caravans and creation of path link to adjacent cycle path. The proposal would provide up to 100 timber clad caravans with each caravan accessed via the service with decking and two off-street parking spaces provided for each caravan. The current proposal is for 92 units. The land to the south-east and westerly corners would be planted and formed with footpaths to provide access to the cycle path to the south. A small area of land on the north-west part of the site would remain open for potential visitor car parking. Landscaping around the site would include new tree belts and hedgerows with the existing trees to be retained.

A sustainable urban drainage system (SUDS) is proposed. A dedicated pedestrian/cycle connection to the West Fife Cycleway NCN Route 764 adjacent to the site is proposed. The provision of cycle hire facilities on site and also a concierge service for residents using (disabled-equipped access) minibuses to and from local transport services is proposed. In terms of landscape planting and mitigation with enhancements to biodiversity, it is proposed the development will include significant amounts of indigenous tree and hedge planting to enhance sense of place in a rural environment, areas of open water, waterside planting, areas of long grass and a wide range of proposed shrub species selected in consultation with the Ecological recommendations to create varied habitat types. The landscape proposals also provide opportunity for local communities to enjoy the landscape with the introduction of a cycle track from the core path NCN Route 764 to the south of the site.

The proposed development layout will not require the removal of either significant groups or large numbers of individual trees. The only removal of established tree stock is a section of linear group G1 (circa 18m) in order to construct a visitor reception centre and associated car parking. This removal would not impact upon the retention of the overall group (circa 110m). Boundary groups G1 and G2 will be retained to provide established vegetation along the boundaries of the site. An area of G2 will require removal, there are no significant established trees in this section of the site with all trees being in the semi mature age class. The proposed development does not make any incursions into the main areas of woodland W1 with the proposed lodges / caravans located outside of the woodland and canopy line (based upon the topo survey).

The development in the western and southeast sections of the site will require the removal of areas of young Goat Willow and Silver Birch colonisation. These areas are not part of the main woodland blocks. They would not impact upon the retention of the overall woodland W1.

In relation to low carbon and renewable energy development, the proposal will include photovoltaic ground mounted or roof mounted (the feasibility of a wind turbine has not progressed owing to cost and to landscape and visual impacts), Air Source and Ground Source heating is identified as potential, and a heat recovery system in the new buildings is under consideration

The Site occupies an area of approximately 6.46Ha and is shown bounded by the red line on Figure 1. This represents the maximum extent of the development and may be subject to reduction as further technical and environmental studies are undertaken and in response to ongoing community consultation through the PAN process.

The layout of the Proposed Development has been developed following initial site investigations and will continue to evolve throughout the design process informed by site specific assessments and consultation

including feedback from the community in the ongoing PAN process. The design will be carefully considered to balance planning, environmental and commercial constraints along with community comments. A planning application is anticipated in future, but it is not anticipated to involve any significant changes to the Project Description set out here.

No borrow pits or other extraction activities are proposed and importation of construction material (other than the infrastructure itself) is likely to be minimal. A 150mm clean topsoil cover is proposed across the open areas of the site, on top of which turf will be laid to provide a grassed cover over the majority of the open site. A Construction Environmental Management Plan (CEMP) prior to construction to minimise the impact on the soil and underlying ground conditions will be approved with the planning authority.

Land use

The land use within the Proposed Development site area consists of abandoned former mine service areas which have been removed and much of the land self seeded or naturalised. The land was never previously mined for coal as its purpose was to convey mining operators to mine shafts in the locale and so none of the land has been mined.

Site Sensitivity and Potential Environmental Effects

An initial assessment of the sensitivity of the site and the potential environmental effects of the Proposed Development surrounding area has been undertaken and is summarised in Table 2 below. Figure 3 and Figure 4 illustrates the identified sensitivities within and in proximity to the Site. These are subject to discussion with Fife Council and NatureScot.

Appendix A submitted also presents the various appointed consultants' summaries about the extent, significance and impact mitigation of the proposals on land use matters. The Applicant has already prepared these summaries for pre-application consultation purposes. Subject to any required change, they propose to submit full detailed reports of these topics in support of a future planning application without submitting an EIA Report.

A summary of the site sensitivities and potential effects is provided in Table 2 below.

Climate Change

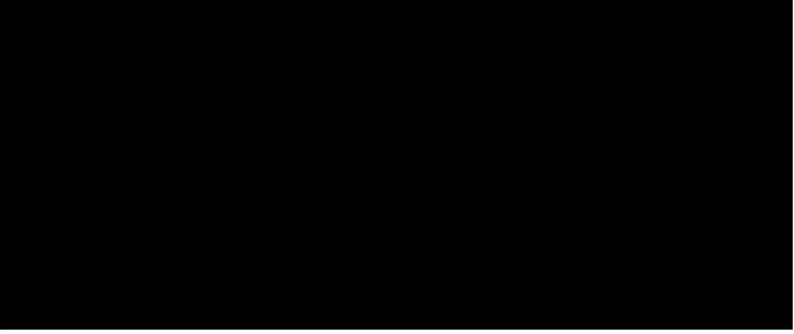
Once developed, the Proposed Development would have a positive contribution to tackling the climate emergency through the reuse of a brownfield site, the limited use of motor vehicles in the site and encouragement for active travel by foot, wheel or on public transport. The positive impact of replanting trees and enhancing biodiversity will also make a contribution to tackling climate change. In this way the Proposed Development will have a positive impact and contribute to International National and Regional climate change targets.

This is considered particularly relevant locally in the context of the support declared by Fife Council for the Scottish and UK Parliaments' climate emergency statements in July 2019.

Table 2: Site Sensitivity and Potential Environmental Effects

Sensitivity	Summary of Site Sensitivity	Potential Effects
Landscape	<p>The site is located within the Lowland Hills and Valleys Landscape Area (FFE5) as set out in the NatureScot Landscape Character Assessment (2019).</p> <p>While the site itself is not typical of the wider character area the immediate surroundings are comprised of gently undulating mixed farmland and areas of woodland and forestry.</p> <p>The site is not covered by any local landscape area designations</p> <p>A Landscape and Visual Assessment is being prepared for the planning application</p>	<p>Limited effects on landscape as the site is well contained, screened and will be set within a green space and blue space development.</p> <p>Potential to improve the landscape quality of a brownfield site with a mining sector legacy.</p>
Visual Amenity from settlements	<p>The nearest settlement Blairhall is 3km to east.</p> <p>The screening effect of existing trees, and the topography, coupled with plans for tree planting, further screening and biodiversity enhancements will reduce any risk of visual impact of the proposal on nearby settlements.</p> <p>A Landscape and Visual Assessment is being prepared for the planning application</p>	<p>Landscape design proposals for the proposed development have been prepared to address the environmental receptors of landscape quality, biodiversity and local communities to ensure the site is further integrated into the existing landscape framework.</p> <p>Any potential residual development effects in relation to landscape character or visual quality are mitigated through retention of the existing woodland to the south; reinforcement of the eastern and western site boundaries with structure planting, individual tree and hedge planting and new entrance proposals on the northern site boundary with tree planting</p>
Traffic and road users	<p>With clearance and maintenance of roadside vegetation, a vehicular access meeting National geometric and visibility standards could be created off the A907.</p> <p>The development could generate some 18 car movements an hour during a peak traffic period - these flows would be low when</p>	<p>A Transport Statement will detail the proposal, traffic generation during construction, in operational period and restoration period, with the likely vehicle types to visiting the site.</p> <p>A Roads Act agreement will be required for the public road network in terms of maintenance agreement and pre/during/post surveys.</p>

	<p>compared with existing traffic levels and should not be considered significant</p> <p>A Transport Statement is being prepared for the planning application</p>	<p>A construction management plan will be required</p>
Recreational amenity	<p>National Cycle Network Route 764 lies south near to the development site</p> <p>There are also paths within the woodland network adjacent</p> <p>A Transport Statement is being prepared for the planning application</p>	<p>The proposal includes the provision of cycle hire facilities on site and also a concierge service for residents using (disabled-equipped access) minibuses to and from local transport services</p> <p>An access plan that includes any safeguards that need to be implemented to ensure the safety of users of the paths will be included as part of any planning application.</p>
Cultural Heritage and Archaeology	<p>The following designated historic environment assets have the potential to be impacted by the proposed development.</p> <p>Scheduled Ancient Monument: Castle Hill enclosure, Bogside Wood SM8549</p> <p>Lying 0.6km west of the proposed development.</p>	<p>The applicants consider that the SAM will be sufficiently distant from the proposal site and that all described landscape and tree planting measures existing and proposed will be sufficient to avoid any impact on the SAM.</p>
Biodiversity and Ecology	<p>River Forth Special Protection Area and Ramsar site</p> <p>A Biodiversity Enhancement Plan is being prepared within the Landscape and Visual Assessment in collaboration with the results of the Ecology Appraisal also in preparation.</p> <p>The Preliminary Ecological Appraisal of Castlehill Mine, Blairhall, Fife will include the results of a Phase 1 Habitat Survey, identifying the habitat types within the Site and 50m buffer, extended to identify any evidence for, or habitats suitable for protected species. It will be supported by a data search commissioned from Fife Nature for historic records of protected and notable species within 1 km, and maps showing habitats, including ancient and other woodlands, statutory nature conservation sites and local Wildlife Sites within 1km, the nearest</p>	<p>Internally bio-diversity enhancements include significant amounts of indigenous tree and hedge planting to the enhance sense of place in a rural environment, areas of open water, waterside planting, areas of long grass and a wide range of proposed shrub species selected in consultation with the Ecological recommendations to create varied habitat types. The landscape proposals also provide opportunity for local communities to enjoy the landscape with the introduction of a cycle track from the core path NCN Route 764 to the south of the site</p> <p>Appropriate mitigation and enhancement in line with NPF4 Policy 3 b for these, and other species shall be recommended in the PEA Report. Any such required mitigation and recommended enhancements shall then be agreed with the client, and co-designed</p>

	<p>of which is Lockshaw Mosses Site of Special Scientific Interest (SSSI), over 500m at its closest to the northeast. There are no Wildlife Sites within 1km.</p> 	<p>with the landscape architect to attract, conserve, restore and sustain biodiversity, and to link and strengthen habitat connectivity within and beyond the development.</p>
Trees	<p>While there are no Tree Preservation Orders on the site, the need to retain the trees is integral to the overall aspiration to create a new community that assimilates with its wooded setting</p> <p>A Tree Survey Report is being prepared for the planning application</p>	<p>The nature of the proposed development and boundary locations of the retained trees should not create pressure for future tree removals. Management will be required in relation to any trees with significant defects or declining health</p>
Drainage Catchment	<p>Bluther Burn is located within the site and is a tributary to the River Forth (the River Forth is a Special Protection Area and a Ramsar site)</p> <p>A Drainage Strategy is being prepared for the planning application</p>	<p>The proposed drainage system is designed in line with NPF4, Policy 22 and Fife Council Design Criteria Guidance (2022). The drainage network is designed to demonstrate no flooding in the 200 year + 39% climate change. A 30% allowance of the remaining greenfield area post development has been included in the design calculations treated as though it is impermeable.</p> <p>The proposed system incorporates a number of SUDs features, including conveyance swales to serve the access roads and attenuation basins to store the surface water run-off prior to discharge offsite.</p> <p>As well as serving as drainage components, these features will be able to receive landscaping/planting that should provide both ecological and biodiversity benefits.</p>

		<p>In line with the planning policy hierarchy, it is proposed to discharge the surface water run-off into the Bluther Burn watercourse which runs adjacent to the site. The rate of discharge will be controlled, restricted to 4.0 l/s/ha as per Scottish Planning Policy.</p>
<p>Ground Conditions</p>	<p>while the site was formerly a mine entrance site, it was not intensively worked itself and is probably too small to offer realisable open cast potential</p> <p>Some risk of upper surface contaminants (naphthalene) as reported in ground investigation reports to be submitted for planning. See attached summary at Appendix 1.</p> <p>A Ground Conditions Assessment is being prepared for the planning application</p>	<p>Based on the nature of the proposed development and design of the site no contaminants have been identified with any credible pathways to identified receptors. As such the site is considered safe for the intended use.</p> <p>The proposed design of the site will see concrete bases and a 150mm topsoil cover system laid across the site. This cover system will therefore break any direct pathway between the identified naphthalene and the future site users and user and site operatives will not come into direct or indirect contact with the impacted soils</p> <p>The Proposed Development would be designed to minimise the impact on soil and under ground strata through the appropriate siting of key infrastructure and foundation design.</p> <p>A watching brief is recommended throughout the construction phase of the development and should any signs of potential contamination found these should be fully investigated, with appropriate remedial action taken as necessary and the local planning authority informed of the findings</p> <p>the proposed lodges will be placed on concrete slabs and elevated above the ground with a clear airflow maintained underneath. As the site is managed these will not be filled or used as storage in the future. The lodge construction itself is sealed to the underside to prevent moisture ingress and the combination of the above would prevent any ground gas present from entering the lodges</p>

	Historical ground gas investigations have been reviewed.	No historic filled areas have been identified within 250m of the site and the potential for ground gas is minimal
Air Quality	<p>The proposed development is not located in an Air Quality Management Area (AQMA). There are no SSSI, Local Nature Reserves, SACs, etc. within close proximity to the site.</p> <p>An Air Quality Assessment is being prepared for the planning application</p> <p>The proposed development will not include any new fixed plant or associated flue stacks</p> <p>There are no significant operational impacts associated with the proposed development</p>	<p>The key pollutants associated with the construction phase of the project will be 'disamenity' or 'nuisance' dust</p> <p>The impact of the development is described using one of the following three categories: 'Low Risk', 'Medium Risk' and 'High Risk'. Based on the risk level, appropriate mitigation measures can be considered to minimise any effects of dust from the construction phase.</p> <p>Therefore the need for stack dispersion modelling can be scoped out. The development is likely to use electric boilers</p> <p>A Construction Management Plan including measures to manage dust impacts during construction will be prepared. This will be in accordance with the Appendix D of the Aval Consulting Group's advice in its Air Quality Assessment Report.</p>
Flood Risk	SEPAs flood risk mapping indicates the development site is free from any flood impact present and future	No action required
Economic Impact	<p>The proposed tourism development is in West Fife and has potential to provide significant economic benefits.</p> <p>An Economic Impact Statement is being prepared for the planning application.</p>	<p>It is clear that the site directly supports the policy directions of NPF4, in promoting sustainable economic growth. It also supports the Fife Economic Strategy which has a sectoral focus, of which tourism is one of seven key sectors, as is construction. It is also designed to directly support the cross-cutting themes of Fife Tourism Partnership's strategy.</p> <p>The strategic fit in tourism and economic development terms is strong, notably in a West Fife and in brownfield regeneration terms. It is a significant investment, with headline investment expected to be in the region of £15 million, this will bring significant up front construction contracts, much of which will benefit Fife businesses.</p>

		<p>Once completed, it will bring notable onsite expenditure and support around ten onsite jobs. Furthermore, tourists will spend time and money in other areas in Fife and the offsite expenditure model suggests this is expected to be in the region of £3.5 million per annum, this will support around 50 offsite tourism jobs, with a GVA effect of around £2 million per annum. Many of these benefits will accrue local in West Fife, and across Fife as a whole.</p> <p>There is no doubting the significant economic impacts of the proposed development, it will further the destination credentials of Fife and West Fife, and support the policy ambitions of Fife Council and the Fife Tourism Partnership.</p>
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Selection Criteria for Screening

Table 3 summarises the Characteristics of the Proposed Development against the criteria set out in part 1 of Schedule 3 of the EIA Regulations.

Table 3: Schedule 3, Part 1 Criteria –Characteristics of development

Criteria	Summary
Scale of Development	<p>100 (current proposal 92) holiday units with parking, access surfaces and a reception building within a 6.4Ha site is considered to be medium scale for a countryside location.</p> <p>However it is considered that the nature of the Proposed Development is not likely to give rise to significant effects from scale</p>
Cumulation with other development	<p>There is one Major development proposal for a mixed use development at the former Comrie Colliery site some 5km east of the development. It is an EIA Project, reference 23/02886/EIA.</p> <p>The proposal is for leisure & tourism, employment, retail, care village, residential, renewable energy, open space, landscape works, paths & associated works. Its scale is much larger at 181Ha (compared to 6.4Ha) and its form and massing is much greater than the Castlehill proposals.</p> <p>For comparison the Comrie scheme is proposing 320-450 chalet lodges when the Castlehill proposal is for up to 100.</p>
Use of Natural Resources	<p>The Proposed Development is to re-use a brownfield site. The surrounding natural resources of water, woodland, biodiversity are intended to be used to frame the setting and place of the new development.</p> <p>Through careful design the Proposed Development will look to minimise any naturalised land take and be retained on the footprint of the brownfield</p> <p>The proposed layout is designed to avoid identified ecological and visual receptors, and the impact on biodiversity will be assessed through</p>

	<p>the ecological appraisal prepared for the planning application.</p> <p>Future operations and activity on the site will encourage active travel, connectivity to the existing cycle and path networks and to explore the wider countryside.</p>
Production of Waste	<p>Each caravan will have storage space for seven days output of waste. At least 60% of the storage capacity will be for recyclable materials. There will be a further communal refuse collection area to the north west area of the site. This will have weekly collections by a commercial contractor appropriately licensed to remove the waste. The communal collection area will be screened by timber fencing and hedgerows with 1100 litre waste bins for mixed recycling or general waste, as well as 240 litre glass bins. The refuse area will be larger yet similar in appearance to the refuse collection area below.</p>
Pollution and Nuisance	<p>The Proposed Development is not considered to have the potential to result in pollution of the environment. These are not considered likely to be significant and will be appraised and addressed through the design process.</p> <p>An air quality assessment is to be submitted with the planning application. It has considered construction (dust) impacts and mitigation measures to reduce other construction related impact.</p>
Risk of Major Accidents	<p>The construction, operation and decommissioning of the Proposed Development is not considered to pose a major accident risk.</p>
Risks to Human Health.	<p>Due to its nature, the Proposed Development is not considered to have the potential to have direct significant effects on human health. The ground contamination report has identified medium to low risk contaminants which will be capped with top soil and gas membrane mitigation is already designed into the layout and future use.</p>

Table 4 summaries the location of the Proposed Development against the criteria set out in part 2 of Schedule 3 of the EIA Regulations.

Table 4: Schedule 3, Part 2 Criteria –Location of Development

Criteria	Summary
Existing Land Use	The existing land use of the Proposed Development site is vacant brownfield land.
Natural Resources	See Table 3 for information on effects on natural resources.
Wetlands , Riparian Areas and River Mouths	The Proposed Development is not located near to any Wetlands, Riparian Areas and River Mouths. It is close to drains and burns which have been discussed in Table 2
Coastal Zones and the Marine Environment	The Proposed Development is not located near to any coastal zones and neither would it give rise to any effects on the marine environment.
Mountain and forest areas	The site does not feature any forestry and no deforestation or woodland removal would be required as part of the construction of the Proposed Development.
Nature Reserves and Parks	The Proposed Development is not located near to any Nature Reserves and Parks.
European Sites	River Forth Special Protection Area Lies downstream of the Bluther Burn
Densely Populated Areas	The Site is rural in nature and therefore is not located in a densely populated area. The nearest residential village of Blairhall lies closest at 3km east
Sites of Historical, Cultural or Archaeological Significance	See Table 2. These are not scoped into this assessment.

Table 5 summarises the Characteristics of the Proposed Development against the criteria set out in part 3 of Schedule 3 of the EIA Regulations.

Table 5: Schedule 3, Part 3 Criteria –Characteristics of the Development

Criteria	Summary
The magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected)	At 6.4Ha the site area is relatively small but in a countryside context could be conceived as medium scale. By contrast a nearby 180Ha proposed development has a much greater magnitude and spatial extent.
The nature of the impact	The Proposed Development is considered not likely to give rise to significant effects. Impacts are anticipated and likely to be limited to visual receptors (e.g. to path users, cyclists and visiting customers) and setting of the existing woodland which will be significantly enhanced by new planting and biodiversity measures.
The transboundary nature of the impact	No transboundary effects are anticipated
The intensity and complexity of the impact	Any effects are likely to be limited and so of low intensity. The potential for impacts are limited to a small number of aspects, and not considered to be complex e.g. visual reception from nearside recreational activity, core path users
The probability of the impact	Limited effects are anticipated. Impacts associated with the construction phase such as dusts will be limited in duration. The nature of the construction phase is temporary, and the operation of the holiday park will be low impact and of limited effect on the surrounding countryside and of significant positive effect on the brownfield regeneration of this site. Accordingly, the probability of any impacts after design and mitigation would be reduced.
The expected onset, duration, frequency and reversibility of the impact	Any minor impacts would be associated with the construction phase (dust,, traffic) and with the operational phase (traffic and use of the surrounding countryside by visitors) and would last for the duration of that phase. The frequency of any impacts would be dependent either on the presence of receptors (e.g. core path an cycle path users in relation to visual impact).
The cumulation of the impact with the impact of other existing and/or approved development	There is one other proposed cumulative development within 1km of the Proposed Development At 5km east the Comrie Colliery proposal could have cumulative impact

	effects owing to its scale and massing and predominance of land uses e.g. 320-450 holiday chalets compared to the maximum 100 in this proposal. However these developments are separated by countryside and the nature of the holiday lodge use is such that it would not give rise to coalescence or urbanisation of the countryside.
The possibility of effectively reducing the impact.	Any potential impact is being identified through appropriate and specific consultant reports on the mentioned environmental topics rather than EIA, and reduced through the design process and commitments to appropriate mitigation. All subject to planning permission and the application of appropriate planning conditions.

Conclusion

After considering all of the above environmental topics against the EIA Regulations, it is concluded that with the commitment to further appropriate and directed land use topic specific assessment in consultancy reports (summaries Appended to this Screening Request) and appropriate mitigation, the potential for significant environmental effects is minimal. Any mitigation is to be identified through the forementioned specific targeted technical and environmental reports to accompany the planning application and implemented through design and commitment to ongoing environmental management and monitoring.

On this basis, it is our opinion that the Proposed Development does not constitute EIA development and we request a formal Screening Opinion from Fife Council.

The Applicant proposes to undertake a number of appropriate assessments to support a future planning application. These have already been advised by Fife Council in its Pre Application Enquiry response and are Appended to this report as summaries. Full reports will accompany the planning application. These will comprise:

- Transport
- Air Quality
- Drainage
- Ecology / Biodiversity
- Trees - Arborist
- Landscaping & Visual
- Economic development
- Ground Conditions
- Air Quality

Other land use reports by virtue of this EIA Screening request are considered not requiring further assessment Flood Risk, Noise and Cultural / Archaeology are considered to be not requiring further assessment.

This leaves the bulleted land use topics to be significant but not in cumulation required to provide a full Environmental Impact Assessment, rather appropriate assessments of these topics is in line with the EIA Regulations as examined in this screening exercise.

We trust the information enclosed is sufficient to register and proceed with the EIA Screening request. If you require any further assistance, please contact me.

Yours sincerely,



Neil Gray

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List of Figures supporting this EIA Screening Request

Figure 1 Site Location Plan

List of Technical Report Summaries (Appended) to this EIA Screening Request:

- Transport
- Air Quality
- Drainage
- Ecology / Biodiversity
- Trees - Arborist
- Landscaping & Visual
- Economic development
- Ground Conditions
- Air Quality