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Ben Jurin Architecture Ltd.
Office 249 North
Altrincham
Hale
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WA14 4DG

Dear Sirs,

Proposed Change of Use of Former Industrial Land to a Holiday Lodge/Caravan Park

McIlhagger Associates were appointed by Ben Jurin Architecture Limited to prepare a Transport Statement to assist Fife Council determine the application for the proposed Change of Use of former industrial land to a holiday lodge/caravan park. The conclusions of the Study included the following: -

- The proposed dedicated pedestrian/cycle connection to the West Fife Cycleway adjacent to the site would provide access to Blairhall some 1.6 miles to the east, where there are half-hourly bus services to Dunfermline Bus Station connecting to numerous local and inter-city long distance services
- There are railway stations in Alloa and Dunfermline offering regular services to Edinburgh and Glasgow.
- 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
- The development could generate some 18 car movements an hour during a peak traffic period - these flows would be low when compared with existing traffic levels and should not be considered significant
- With clearance and maintenance of roadside vegetation, a vehicular access meeting National geometric and visibility standards could be created off the A907

Yours faithfully,

John McIlhagger

John D McIlhagger BSc CEng MICE MCIHT
Traffic & Transport Engineering Consultant

Project: Change of Use of Industrial Land to Holiday Lodge/Caravan Park at Castlehill Mine

Location: Castlehill Mine, Brankstone, Blairhall, Fife, FK10 3QD

Prepared By: Jane Dobson Chartered Landscape Architect (CMLI)

Date: 30th November 2023



Executive Summary Statement for EIA Screening - Landscape

This executive summary landscape statement is prepared in response to the request from Fife Council to submit an EIA screening report for the proposed change of use of 6.4 acres industrial land to circa 92-unit holiday lodge/ caravan park at Castlehill Mine, Brankstone, Blairhall Fife.

Site visits were undertaken in October and November 2023 by Jane Dobson CMLI and photographs taken. Key features of the development site are the boundary planting to the west, the rising topography to the east and a large swathe of woodland on falling topography to the south and south west to the Bluther Burn. Internally the site is relatively level with remanent concrete slabs, hardstanding, roadway from its previous use as mine working for labour and equipment together with a settlement pond.

The site is located within the Lowland Hills and Valleys Landscape Area (FFE5) as set out in the NatureScot Landscape Character Assessment (2019) and while the site itself if not typical of the wider character area the immediate surroundings are comprised of gently undulating mixed farmland and areas of woodland and forestry. The site is not covered by any local landscape area designations.

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. 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.

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.

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In accordance with the Pre-App response the landscape proposals will include siting, design, size and specification of all proposed planting for the site boundaries and internally to enable the landscape to be fully implemented with appropriate fencing to take cognizance of the woodland setting.

The proposed development site is considered to be well screened by topography and existing vegetation limiting views into the site and as such is not considered to result in a detrimental effect on the existing landscape character or visual amenity of the Lowland Hills and Valleys LCA following implementation of the landscape proposals.

A positive beneficial effect is predicted whereby the site is converted from vacant brownfield landscape to a managed landscape with increased vegetation cover and longer-term tree planting and boundary reinforcement thereby enhancing the wider landscape character and visual amenity.

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Former Castle Hill Mine Site
Brankstone,
Blairhall,
Fife

Antony Wood Cert Arb RFS

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Executive Summary:

Proposed Lodge / Static Caravan Development

Current site and survey.

The tree survey site is comprised of the central open areas and the margins / boundaries of the former coal mine at Castle Hill Mine, Brankstone, Blairhall, Fife. Tree stock within the survey boundaries is located around the edges of the central site. It is composed of two continuous linear groupings of amenity / landscape planting with additional colonisation and a section of mixed woodland which encompassed the western / southwestern areas of the overall site. There is an absence of established tree stock within the central areas of the site other than occasional young colonisation by pioneer species and scrub.

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 surveyed on 08/10/2022 by Antony Wood; diameter at Breast Height (DBH) measurements were taken at 1.5m and average crown extents were measured via laser measure. The surveyed trees were then categorized by the standard retention categories as defined in BS5837:2012. Such retention categories seek to inform the design process of trees which may be worthy of consideration for inclusion within the proposed development. Tree locations were taken from the supplied site topographic survey. Trees were surveyed throughout the entire site, detailed individual details were recorded for all significant individual mature trees within the existing site. Where larger numbers of smaller trees were encountered in the survey area these are included as a Group or Woodland record which includes the approximate height range and average Diameter at Breast Height (DBH) of trees within the group, these groups are referred to by group i.e. Group 2 (G2) or Woodland (W1).

With the exception of group G1 and three individual trees adjacent to the highway boundary, all tree stock was in the semi to early mature age classes.

The overall site is a mixture of some areas of boundary landscaping / screening planting along with volumes of natural colonisation.

Proposed development.

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 the section of linear group G1 (circa 18m) in order to construct the reception and associated car parking. This removal would not impact upon the retention of the overall group (circa 110m).

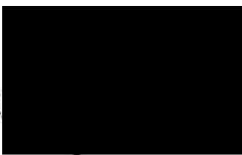
Boundary groups G1 and G2 can be retained to provide established vegetation along the boundaries of the site. An area of G2 will require removal, there are no significant established trees in this section of the site with all trees being in the semi mature age class.

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.

No significant impacts will be placed upon the retained trees by the proposed development if suitable methods are used as outlined in this document. A small area of initial hand digging may be required.

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.



Antony Wood

2023-12-08 Castlehill Mine Ecology Section for Scoping Report

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 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.

Historic records of protected species nearby include 2019 records of red squirrel from Castle Hill conifer plantation to the west, and a 2010 pine marten record from further west, and less precise records of soprano pipistrelle and Nathusius's bat from 1995-1999. There are suitable habitats for all these protected species close to but not within nor immediately surrounding the Castlehill Mine development site. Hedgehog has been recorded east of the Site, and there is evidence of common lizard breeding along the disused railway track to the southeast. Appropriate mitigation and enhancement in line with NPF4 for these, and other species shall be recommended in the PEA Report.

Our Ref: 23351

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01st December 2023

For the attention of Mr Ben Jurin
(Via email only)

Dear Ben,

Re: Proposed Holiday Lodges/Caravan Park,
Castlehill Mine, Alloa, Fife

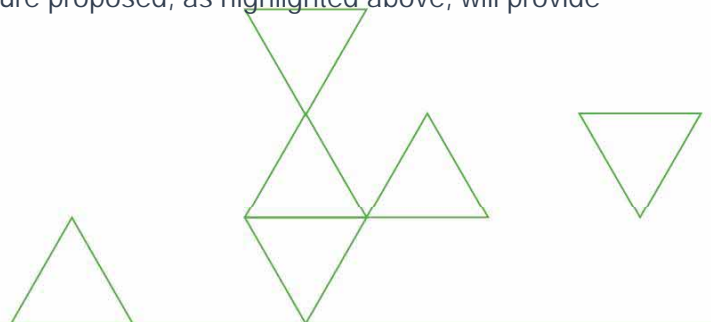
We can confirm that we have been retained by Ben Jurin Architecture Ltd to undertake a Flood Risk Assessment and produce a Drainage Strategy with associated documentation to meet the needs of a planning application for the proposed holiday lodge/caravan park at the former Castlehill Mine site. We are a well established consulting engineering firm and all of our work is undertaken and overseen by experienced members of staff.

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.

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. As well as serving as drainage components, these features will be able to receive landscaping/planting that should provide both ecological and biodiversity benefits.

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.

In line with NPF4, Policy 9 the development proposes to regenerate an existing brownfield site. Existing infrastructure, most notably the site entrance and access roads are to be retained and repaired or improved. The blue-green infrastructure proposed, as highlighted above, will provide ecological and biodiversity benefits.



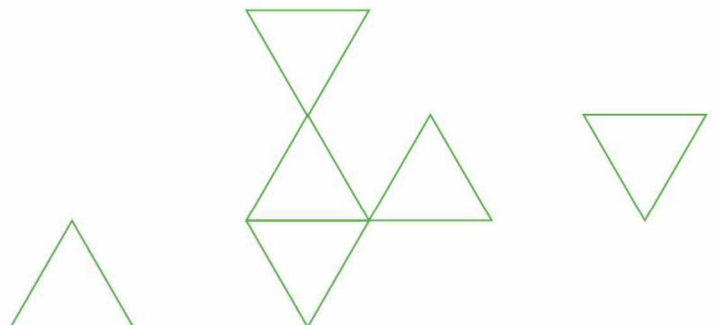
The proposed scheme as a whole will provide an improvement to the current site in terms of surface water management but also the secondary benefits that can be associated with the inclusion of SUDs drainage features and blue-green infrastructure.

A full design package will be included within the information supplied as part of the planning application.

Yours faithfully,



Richard Gadsden
Director
Gadsden Consulting





Contaminated Land Summary

This summary has been produced for inclusion with the Environmental Impact assessment Screening report and follows the completion of a Contaminated Land Desk Study Review ref: 2627-1 produced by Martin Environmental Solutions Ltd.

Proposed Development.

The proposed development is for a managed holiday caravan site, with short stay visitors. The existing concrete hardstanding will be broken up and replaced with individual concrete bases for the proposed caravan lodges. The internal roadways will remain.

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. Tree and hedges will be used around the edge of the site with some infilling. These will be planted in suitable soil medium due to the made ground encountered across the site.

Site History

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.



Previous Investigations

A previous intrusive investigation has been undertaken by McGregor McMahon & Associates in August 2006 for a proposed housing development. This investigation identified the presence of made ground across the site consisting of mixed natural material with some brick, concrete, textiles and timber. Below which glacial till – clay is present. A number of soil samples were taken for analysis over two sampling rounds. The first round of sampling was taken from across the main site, with the second round concentrating on the southern section around the pond area.

The results from the previous investigation have been reviewed and compared to the current LAQ/CIEH Safe for use Levels (S4ULs) for Residential without home grown produce. The development will comprise a managed holiday caravan park; visitors will only be present on site for a short period of time and will not be undertaking any gardening activities during their stay. No edible vegetation will be present on site. This is different to the original assessment which was conducted for independent residential dwellings with gardens, and therefore assumed with home grown produce.

The soil analysis results have confirmed no elevated levels of heavy metals, petroleum hydrocarbons, or asbestos. With the exception of two trail pits (TP09 & TP10) no elevated levels of Polycyclic Aromatic Hydrocarbons, TP09 & TP10 had slightly elevated levels of Naphthalene detected.

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. Naphthalene is solid at room temperature, with a high melting point at 80°C, with an even higher boiling point. The release vapours, particularly through the cover material is therefore remote.

Given the design of proposed use of the site the elevated levels do not pose a significant risk to the end users.



Ground Gas

Previous monitoring undertaken by White Young Green has confirmed that the historic mine shafts are flooded with static water levels and no coal gas is being emitted to present a risk to human health. No historic filled areas have been identified within 250m of the site and the potential for ground gas is minimal.

In addition, 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.

The presence of ground gas is therefore considered to be negligible and no further action is required.

Recent Site Walk Over

In addition to a review of publicly available information to identify any changes in the area a further site walk over has been undertaken on the 1st October 2023. This confirmed the visual findings of the previous reports and has not identified any additional risks of contamination on or off site that have not been previously recorded and investigated.

Conclusion

A review of previous investigations, the history of the area and a site walkover survey have been undertaken. 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.

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.

Aval Consulting Group.



Air Quality Assessment- Executive Summary

Castlehill Mine, Brankstone, Blairhall, Fife

BenJurin Architects

December 2023

Project Information

Title	Air Quality Assessment
Job Code	92960
Sector	Environment
Report	AQA
Client	BenJurin Architects
Revision	A
Status	Final
Date of Issue	1 st December 2023

Revision History

Revision	Date	Author	Reviewer	Approver	Status
A	1 st December 2023	AP	MT	AC	Final

Disclaimer

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party. This report may include data obtained from trusted third-party consultants/laboratories that have been supplied to us in good faith. Whilst we do everything, we can to ensure the quality of all the data we use, we cannot be held responsible for the accuracy or integrity of third party data.

1 Executive Summary

1.1 Overview

BenJurin Architects (“The Client”) is seeking consent for mixed-use development on Castlehill Mine, Brankstone, Blairhall, Fife (hereafter referred to as the ‘proposed development’), which is within Fife Council (FC).

AVAL Consulting Group Limited (ACGL) was instructed by the client to produce an Air Quality Assessment to accompany the planning application to FC for consent to undertake the proposed work.

The proposal is for change of use of industrial land to holiday lodge/caravan park including siting of caravans and creation of path link to adjacent cycle path.

The potential local air quality effects of the proposed development have been assessed using the latest planning guidance from Environmental Protection UK (EPUK), the Institute of Air Quality Management (IAQM)¹ and the Department for Environment, Food and Rural Affairs (Defra)².

A construction dust risk assessment has been undertaken, to consider the potential risk from dust-generating activities during the construction phase of the development. This has been carried out in accordance with the latest IAQM guidance on construction dust³.

1.2 Objective

This report provides an assessment of the following key impacts associated with the constructional and operational phase of the proposed development:

Nuisance, loss of amenity and health impacts associated with the construction phase of the development of sensitive receptors;

Changes in traffic-related pollutant concentrations associated with the operational phase of the proposed development; and

Suitability of the proposed development location in terms of existing air quality.

1.3 Relevant Policy and Legislation

The following policy has been considered when undertaking the air quality assessment:

European Union

Environment Act

Scottish Planning Policy Framework

Cleaner Air Scotland

¹ IAQM (2017): ‘Land Use Planning and Development Control: Planning for Air Quality v1.2’.

² Defra (2016): ‘Local Air Quality Management – Technical Guidance (TG16)’.

³ IAQM (2016): ‘Guidance on the Assessment of Dust from Demolition and Construction v1.1’.

AVAL Consulting Group Limited, 3 Lloyds Avenue, EC3N 3DS, London, United Kingdom W www.aval-group.co.uk

Environmental Protection Act 1990
National Air Quality Standards

Further details of these policies have been provided within the submitted Air Quality Assessment.

1.4 Site Location

Figure 1.1 shows the proposed site location. 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.

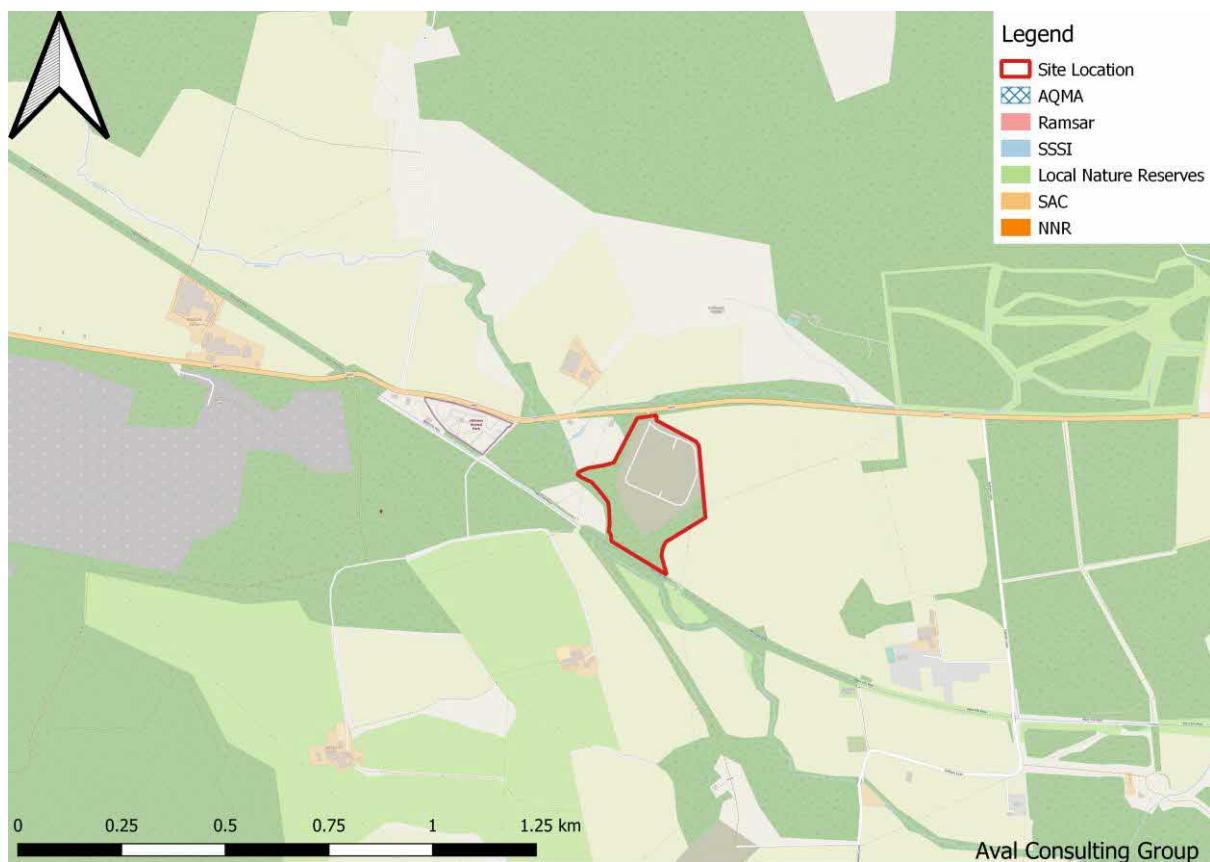


Figure 1.1: Proposed site location

1.5 Assessment Findings

A qualitative assessment of construction dust effects has been undertaken for the proposed scheme. The construction phase is predicted to have a 'High Risk' of nuisance and/or loss of amenity impacts due to dust nuisance. However, the risk of dust nuisance can be mitigated by implementing the appropriate mitigation measures listed in Appendix D of the submitted air quality assessment.

The development is not anticipated to generate a significant number of additional road traffic during the operational phase and fall below the criteria proposed by IAQM to proceed to a detailed assessment. Hence, no traffic-related air quality dispersion modelling has been undertaken.

The development is considered suitable for development based on background pollutant concentrations provided by the local authority and DEFRA.

It can, therefore, be concluded that the proposed development is not considered to conflict with any national, regional, or local planning policy in relation to construction and operation phase dust and air quality nuisance.



EXECUTIVE SUMMARY

This Statement on Energy outlines the responses to the energy policies within Fife Council’s Local Development Plan (LDP) and National Planning Framework 4 (NPF4) in relation to the proposed development of a holiday lodge / caravan park at Castlehill Mine, Blairhall, Fife.

The requirements for the development, which have been extracted from Building (Scotland) Standards, FIFEplan and NPF4, are summarised as follows:

- Building (Scotland) Standards Compliance.
- Low and zero carbon generating technologies will contribute at least a 20% reduction in CO₂ emissions.
- Construction materials come from local or sustainable sources.
- NPF4 – Policies 1, 2 and 12.

In order to address the requirements of **FIFEplan Policies 1 and 11, NPF4 Policies 1 and 2, and Building (Scotland) Standards:**

The development will adopt the energy conservation hierarchy of LEAN, CLEAN and GREEN.

This will include a Fabric First Approach as well as the implementation of the following LZCGTs outlined in the following matrix:

LZCGT		HEAT NETWORK	VIABILITY	NOTES
Photovoltaics		Heat Network Is not viable	✓	PV should be considered as a central solution and / or as an individual building solution. Battery storage should be considered to maximise usable generated electricity and alleviate pressure on network
Solar Thermal			✗	Technology not recommended due to poor outputs and high capital costs.
Wind Turbines			🔍	Technology to be investigated due to the potential for large scale energy generation to meet a large and consistent electricity demand. Additional planning considerations and capital cost may be restrictive
Biomass			✗	Technology not recommended due to air quality, plant space and management concerns. Ambiguity over its credentials as a LZCGT
Combined Heat & Power (CHP)			✗	CHP utilises fossil fuels and ambiguity over its credentials as a LZCGT.
Heat Pumps	Air Source		✓	ASHP would be an effective energy source technology.
	Ground Source		✓	GSHP (Vertical) would be an effective energy source technology, however the site is too constrained for it to be viable.
	Shared – Loop		✓	Solution as a shared loop (ambient) serving individual heat pumps in each dwelling and building. Potential solution which should be considered if financially viable.
	Water Source		✗	No suitable body of water in close proximity to the development.
Hydro Electricity			✗	No suitable moving body of water in close proximity to the development.
Heat Recovery		✓	Technology should be considered to reduce heat consumption; however, Heat Recovery alone, will not provide a 50% carbon reduction on its own.	

The adoption of the strategies outlined above, will ensure that project complies with Section 6 Building (Scotland) Standards and the 20% reduction in CO₂ emissions* as well as satisfying the requirements of FIFEplan Policy 1 and NPF4 Policies 1 and 2.

Unfortunately, as there are no existing or proposed Heat Networks in the area and due to the low heat demand density and the lack of anchor loads, a Heat Network is not viable.

**During the detailed design at warrant stage, SBEM Calculations will be produced to demonstrate how buildings will meet the carbon reduction requirements of Section 6 (Enerav) 2023.*

In order to address the requirements of **FIFEplan Policy 11, and NPF4 Policy 12:**

The development will utilise the following circular principles in the construction of buildings and re-development of the site.

CIRCULAR ECONOMY PRINCIPLES FOR CONSTRUCTION

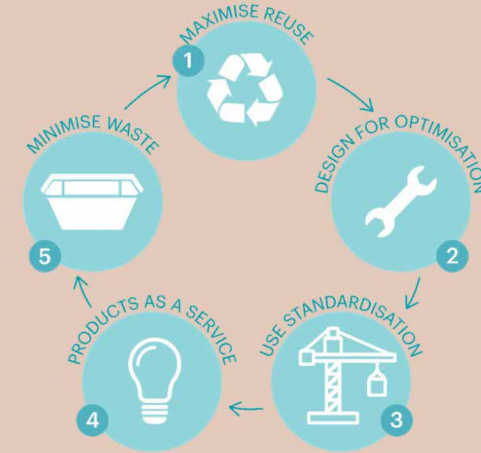


Fig. 2-2 Circular economy principles for construction (UKGBC)

The building will utilise sustainable materials and will also utilise offsite modular construction, which is recognised as more carbon efficient when compared to traditional construction methods. The project will also endeavour to use local supplies and also factor in materials with re-cycled content so as to avoid virgin materials.

It should be highlighted that as the current brownfield site contains concrete roads and hardstanding, the current proposal will add value in terms of ecology and biodiversity.

Unfortunately, as there are no existing or proposed Heat Networks in the area and due to the low heat demand density and the lack of anchor loads, a Heat Network is not viable.



Ben Jurin
Ben Jurin Architecture
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30th November 2023

Dear Ben

Castle Hill Lodge Proposal: Socio-economic Screening

I can confirm that we are retained by Ben Jurin Architecture to lead on the Socio-economic Impact Assessment on the above proposed development. We are a leading Economic Development consultancy specialising in the undertaking independent and technically compliant economic impact assessments.

We have been retained by Ben Jurin Architecture since September 2023, and we have completed an initial socio-economic appraisal of the proposed development. 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.

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.

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.

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.

A full Socio-economic impact statement will be presented as part of the ongoing Planning Application.

Yours sincerely

Mark Kummerer
Director
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MKA Economics

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