
The New Picture House 117 North Street, St Andrews

Planning Statement



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1. Introduction

1.1. This Planning Statement has been prepared on behalf of TS SA Property Holdings Limited (trading as T-Squared Social) and New Picture House (St Andrews) Ltd in support of the following:

- **Planning Application – Part use of cinema (Class 11) to include ancillary restaurant (Class 3) and bar (Sui Generis) areas with associated internal and external alterations (ePlanning Ref: 100666171-001)**
- **Application for Listed Building Consent – Internal and external alterations at 117 North Street, St Andrews (ePlanning Ref: 100666171-002)**

1.2. The submitted applications seek planning permission and listed building consent to enable a modern hybrid operation of interactive entertainment, restaurant and public house at The New Picture House, 117 North Street, St Andrews, KY16 9AD.

1.3. Importantly, the delivery of this entertainment and hospitality attraction will enable a cinema offering to be maintained in St Andrews, while saving the current historic building.

1.4. This Statement sets out the background to the proposed operations before examining national and local planning policy alongside the key material considerations in assessing the appropriateness of the proposals and associated alterations.

1.5. This Statement is set out as follows:

Section 2	Site Description, Context and Planning History
Section 3	Proposed Development
Section 4	Planning Policy Statement
Section 5	Town Centre First / Sequential Assessment
Section 6	Conclusions

2. Site Description, Context and Planning History

Site Description

- 2.1. The premises at 117 North Street is Category B Listed (Ref: LB51110) and falls within the Central St Andrews Conservation Area. The premises are located immediately to the north of the St Andrews Town Centre as defined by the adopted Fife Local Development Plan (LDP) (adopted September 2017).
- 2.2. The premises, known as The New Picture House, is a prominent local building on North Street with a long standing history as a cinema. The adjacent buildings on the north side of North Street are characterised by hotels, public houses, restaurants, university related uses and a limited number of residential dwellings. The south side of North Street is primarily characterised by residential dwellings alongside a coffee shop and hotel annexe.
- 2.3. The premises are considered to operate under Class 11 (Assembly and Leisure) of the Town & Country Planning (Use Classes) (Scotland) Order 1997 (as amended).

Site Context

- 2.4. The New Picture House is currently an independent cinema which opened in 1930. It comprises a main screen lounge with two smaller screens. The current cinema seating capacity is 700.
- 2.5. The New Picture House has been an integral part of St Andrew's entertainment base over this period serving as a central gathering place for St Andrews residents and the destination for entertainment in St Andrews. However, like most cinemas across the UK, it is operating in a financially challenging environment with the global cinema industry in a state of decline. After years of box office growth, the global cinema sector faced harsh challenges during 2020, brought on by the pandemic lockdowns. UK box office revenue reached a total of £978.5 million in 2023, which was still 21.8% behind the 2019's pre-pandemic box office of £1.252 billion. Admissions were down by 30% when comparing 2023 to 2019.



- 2.6. These challenges have been underpinned by a seismic change in the way people consume media and content. This coupled with a permanent reduction in commercially successful Hollywood and independent film content that is directly available on streaming services such as Netflix, a cost-of-living crisis, and a rise in operational costs including payroll and energy prices poses significant financial challenges to The New Picture House's operation.
- 2.7. As a cinema, The New Picture House receives no public subsidy, such as that received by the Filmhouse locations in Edinburgh and Aberdeen, which even with revenue funding failed while Dundee Contemporary Arts Cinema has highlighted its own struggles to remain financially viable.
- 2.8. The challenges facing this sector are further evidenced through the recent news that the Kino Cinema in Leven will be closing its doors due to significant viability challenges of operating for the reasons discussed above.
- 2.9. Sadly, The New Picture House will be forced to close its doors as it is currently running at under 10 per cent occupancy and is no longer a viable stand-alone cinema operation for the owners. Being solely a cinema that only focuses on transactional ticket sales in times of easy and convenient access to streaming services is not working anymore. Without a serious and timely intervention, a cinema offering will be lost within St Andrews.
- 2.10. The challenges facing the cinema are not unique to St Andrews and are being felt throughout the world and UK. Industry experts agree that while there is a future for Cinema's, the fast changing trading climate necessitates that they must evolve to survive. Combining Cinemas with other leisure uses, commonly referred to as a vision to blend a Cinema with Dining and Entertainment (CDE) is the over arching direction of the industry nationwide at present.
- 2.11. The current operating and occupancy challenges were further evidenced on Sunday 11th February 2024 when St Andrews residents (including students) attempted to fill The New Picture House cinema. Despite the organisation and coordination, the attempts only translated into 387 ticket sales out of a possible 2,100 (i.e. 18.4%) available across the three screening sessions that day. These occupancy figures clearly depict the challenges facing the existing cinema and its ability to operate as a commercially viable business.

- 2.12. The proposals put forward by T-Squared Social are welcomed by the current cinema owners and will help secure The New Picture House's long-term future by maintaining film screenings while also modernising the offer to provide a wider range of entertainment and dining experiences. The local community, students and visitors will have the opportunity to experience a broader range of cinema, dining and entertainment at the popular venue following the investments proposed by the Applicant. This approach actively engages with customers and creates more reasons to visit for all age groups.
- 2.13. The proposals by T-Squared Social will ensure that the premises remain open 7 days per week. This will importantly maintain the ability to book mainstream Hollywood movies as they are released (1st run) given there is a requirement for 7 days per week contracts on their opening as well as live to cinema events including opera, ballet, theatre and music performances.
- 2.14. As highlighted, the trading challenges which The New Picture House has faced has meant that little investment has been available to modernise the cinema including the seating (both materiality and comfort level), audio visual technology and heating/air conditioning in the building. These have all reached the end of their lifespan. The investment being realised through the proposals by T-Squared Social will address this and create a cinema that St Andrews can be proud of and customers enjoy.
- 2.15. Consequently, the delivery of this entertainment and hospitality attraction is crucial in helping to secure a cinema offering going forward in St Andrews, which is a key priority for the Applicant, while providing much needed sensitive enhancements to the historic building to preserve it in the long term. Further detail on the proposed renovations and enhancements made to the building are detailed in Section 3.

Key Planning History

- 2.16. A search of the site's planning history on Fife Council's public access planning portal confirmed the following key planning permissions at 117 North Street, St Andrews:
- 99/01132/EFULL – Planning permission approved on 10 February 2000 for change of use application for pavement to outdoor seating area, alter frontage and erection of beer store to rear.
 - 00/01569/EADV – Advertisement consent application approved 18 August 2000 to display externally illuminated projecting sign, projecting canopy sign, and post mounted menu board.

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- 00/03307/EADV – Advertisement consent application approved 12 December 2000 approved to display four illuminated fascia signs.
- 01/03258/EADV – Advertisement consent application approved 22 January 2002 to install replacement menu display case (illuminated).
- 02/03003/EFULL – Planning permission granted 04 December 2002 to extend 2 rear brick chimneys to accommodate telecom antennae, replace door and handrail on rear upper balcony with replica to house associated telecom equipment and erect equipment cabins at ground level.
- 03/03864/EADV – Advertisement consent application approved 1 April 2004 to display two illuminated digital fascia signs.
- 04/03333/EFULL – Planning permission granted 05 November 2004 to resurface entrance area.
- 04/01936/EFULL – Planning permission granted on 18 August 2004 to install a 7.6m high telecom flagpole, including 3 shrouded antennae, transmission dish and ancillary equipment.
- 15/03919/FULL – Planning permission granted 25 January 2016 for the replacement of 1 no. existing trisector antennas with 1 no. new trisector antennas, installation of 1 no. 600mm dia dish antenna, removal of 1 no. equipment cabinet, installation of 3 no. additional cabinets plus minor ancillary works.
- 15/03920/LBC – Listed building consent approved 22 January 2016 for installation and replacement of telecommunications equipment.
- 17/02385/FULL – Planning permission approved 12 July 2018 for the replacement of 4m communications mast with new 7m communications mast flagpole and installation of ancillary equipment.
- 17/02386/LBC – Listed building consent approved 12 July 2018 for the replacement of 4m communications mast with new 7m communications mast flagpole and installation of ancillary equipment.
- 19/02022/LBC – Listed building consent approved 18 September 2019 for internal alterations to foyer including installation of replacement ticket/sales kiosk and replacement of flooring.

3. Proposed Development

3.1. An application for Planning Permission has been submitted to Fife Council which proposes:

Part use of cinema (Class 11) to include ancillary restaurant (Class 3) and bar (Sui Generis) areas with associated internal and external alterations (ePlanning Ref: 100666171-001)

3.2. As established, the premises currently operate under Class 11 (Assembly and Leisure) and this use will be maintained through the retention of Screen 3 for full time cinema use and the primary Screen 1 being retained to show live sport as well as to host enhanced movie experiences. As noted, the cinema currently accommodates 700 cinema seats across the three screens. The Proposed Development will ensure that approximately 345 seats are retained within the building for cinema use (equating to 49% provision being retained).

3.3. In addition, The Class 11 (Assembly and Leisure) use will also be expanded to allow for the addition of interactive entertainment uses, including sports simulators, electronic darts and table football. The addition of Class 3 (Restaurant) and Sui Generis (Public House) uses within the premises will allow a bar, dining area and event space to be established within the premises. This will deliver a fit for purpose modern operation which combines cinema, dining and entertainment (CDE) activities under the one roof.

3.4. Due to the building's Category B Listed status, an application for Listed Building Consent has also been submitted to Fife Council which proposes:

Internal and external alterations (ePlanning Ref: 100666171-002)

3.5. The submitted drawings for both the FUL and LBC applications details the alterations proposed to facilitate T-Squared Social's operation at 117 North Street. The alterations proposed are minimal and sensitive to the buildings heritage designation, with major works minimised and the internal and external listed features maintained alongside two of the three cinema screens. The upper level balcony within the main auditorium will remain largely untouched. Full details are contained within the submitted Design Statement.



- 3.6. As part of the proposals, investment will be made into upgrading the audio and visual technology within the premises to ensure a much enhanced cinema experience is achieved going forward. This also includes introducing much improved and larger seats into Screen 1, to replace the existing seats which are small and in very poor condition.
- 3.7. As indicated in Section 2, the proposal has come forward due to the evident challenges experienced in operating a traditional cinema in the current climate. Demand for wide ranging experiential destinations is increasingly being witnessed and the T-Squared Social proposal seeks to reflect a diverse leisure and entertainment offer which also maintains the core cinema offering at The New Picture House. It is considered that this offer will have significant reach and interest from locals, students and visitors in St Andrews.
- 3.8. Clearly, the proposals by T-Squared Social, a unique cinema, dining and entertainment (CDE) experience, will positively contribute to this area of St Andrews. Implementation of the proposal will importantly save and maintain the cinema operation while enabling sizeable investment, generating jobs and footfall, all to the benefit of the wider town centres vitality and viability.
- 3.9. T-Squared Social's proposal secures the long term future of The New Picture House and brings a high quality long-term tenant that positively contributes towards the vibrancy and offering of the town centre to locals, students and tourists alike.

About T Squared Social

"In partnering closely with ownership of the cinema, we are taking great care to preserve and celebrate the historic architecture and design of the theatre and continue its tradition of showcasing great films. Our goal is to bring new life and longevity to the New Picture House by creating a year-round, multidimensional entertainment destination for residents, students and visitors, in keeping with the incomparable Scottish spirit of St. Andrews."

Christopher Anand, CEO and Managing Partner at T-Squared Social

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- 3.10. T-Squared Social was formed with a vision to create a dynamic, social destination for entertainment and dining. Increasingly, customers are demanding a mix of activities to participate in during their leisure time and T-Squared Social are at the centre of this trend, offering customers the opportunity to combine food and beverage with a range of sport led entertainment and activities, suitable for all ages.
- 3.11. T-Squared Social have a flexible business model which allows them to trade alongside a range of complimentary leisure uses and the business is readily able to tailor its "look and feel" to fit in with the style and character of each location they open in. Their first flagship venue opened in September 2023 in the heart of New York City, just a block away from Times Square and Grand Central Station. In this location they occupy the ground and basement floors of a modern office building and does not include a Cinema. St Andrews represents the first opportunity for the business to partner with another leisure use - the Cinema - which they will compliment as part of an expanded leisure offer.
- 3.12. The T-Squared proposal for The New Picture House has been adapted accordingly to respond to the heritage of the building, town and existing cinema use within the building. This ensures that St Andrews residents (including students), other local residents elsewhere in north-east Fife and other (regional, national and international) visitors to St Andrews can continue to enjoy movies at the same destination that has been a community jewel for 90 years, but with the added plus of having new fun, family-friendly entertainment options under the same roof. This brings with it new and exciting leisure opportunities to St Andrews diversifying the offerings available in the town.
- 3.13. One of the unique leisure activities on offer at T-Squared Social are the sports simulators. Utilising the latest simulator technology from Full Swing, these simulators are suitable for adults and children alike, and allow patrons to play more than 100 golf courses around the world as well as 15 sports including football, NFL American football, baseball, rugby, cricket, lacrosse and more.

- 3.14. T-Squared Social are dedicated to creating an entertainment venue which caters to the needs of locals and visitors alike. As detailed, two cinema screens are to be retained within the proposed development to safeguard this valuable community facility. Cinema 3 will be retained in its existing envelope, with improvements made to the very worn seating and technology to improve the viewing experience. The screen in the main auditorium is also to be retained in what will become a multi-functional space. The existing fixed seating will be removed and replaced with comfortable/movable seats. This will allow them to be positioned depending on the use of the auditorium and when a movie is being shown, the seats will point to the big screen, the lights dimmed and other activities will pause to allow for quiet cinema experience. Complimenting this will be the upper tier of the Cinema, where the balcony area and seating will be retained for Cinema viewing in its existing configuration.
- 3.15. T-Squared Social also has an innovative membership model that offers proprietary benefits for T-Squared Social members which encourages frequent use, loyalty and higher per visit transactions. This membership programme will be targeted for university students to create loyalty year-round, including the winter months when there are less golf-orientated visitors in the area.

Hours of Operation

- 3.16. The proposed hours of operations are as follows:
- Sunday – Thursday: 0900 – 2400
 - Friday – Saturday 0900 – 0100

Employment and Jobs

- 3.17. The proposals represent a significant investment in the region of £2 million into St Andrews.
- 3.18. The refurbishment and construction works will seek to employ local contractors (with appropriate experience) creating opportunities for businesses throughout Scotland.
- 3.19. Once operational, the venue will also deliver new employment opportunities through the hiring of waiters, bar tenders, kitchen, door and reception staff.

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3.20. The proposals are expected to generate 40-45 full time and part time positions across management, bar, kitchen and hosts/waiting staff. This is a significant uplift in employment opportunities from the current 5 full time equivalent positions. T-Squared Social are committed to offering a competitive pay structure with a focus on hiring local residents for available positions.

Stakeholder Engagement

- 3.21. The project team have met with a number of stakeholders and interested parties. This includes discussions with Wendy Chamberlain MP and Willie Rennie MSP to outline the emerging proposals at The New Picture House and discuss the business challenges facing The New Picture House.
- 3.22. Following discussions, the Applicant has taken on board a number of comments raised. Consequently, the retention of the main auditorium screen and the flexible seating arrangement proposed in this space is a key element which has evolved following these stakeholder discussions. The balcony seating in the main auditorium is also going to be retained following key stakeholder discussions.
- 3.23. Constructive discussions were also held with the St Andrews Film Society. The Applicant was able to set out the proposals in detail and allay concerns that the cinema element was being lost. The St Andrews Film society subsequently noted *“we’ve managed to get the development plans to a level that we are comfortable accepting, so we will continue working closely with all parties involved to ensure that the cinema remains committed to the interests of the St Andrews community”*.
- 3.24. The Applicant, in advance of the planning submission, also outlined further information on the proposals within a short video and a dedicated website with an FAQ section (www.tsquaredsocialsta.com).

4. Planning Policy Statement

4.1. The following narrative details planning policy relevant to the assessment of the proposals.

4.2. Sections 25 and 37 of the Town & Country Planning (Scotland) Act 1997 state:

“Where in making any determination under the Planning Act, regard is to be had to the Development Plan that determination shall be made in accordance with the Development Plan unless material considerations indicate otherwise” (Section 25). “In dealing with an application, the Planning Authority shall have regard to the provisions of the Development Plan so far as material to the application and to any other material considerations” (Section 37).

4.3. Section 59 (1) and (3) of the Planning (Listed Building and Conservation Areas)(Scotland) Act 1997 states:

“(1) In considering whether to grant planning permission for development which affects a listed building or its setting, a planning authority or the Scottish Ministers, as the case may be, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

“(3) In this section, ‘preserving’, in relation to a building, means preserving it either in its existing state or subject only to such alterations or extensions as can be carried out without serious detriment to its character, and ‘development’ includes redevelopment.”

4.4. Section 64 of the Planning (Listed Building and Conservation Areas)(Scotland) Act 1997 states:

“In the exercise, with respect to any building or other land in a conservation area, of any powers under any of the provisions in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area” (Section 64).

The provisions in subsection (2) include the Town & Country Planning (Scotland) Act 1997.”

The Development Plan & Key Material Considerations

4.5. In the context of the proposals, the development plan comprises:

- National Planning Framework 4 (NPF4) (February 2023)
- Fife Local Development Plan (LDP) (September 2017)
- Supplementary Guidance (SG) which explains in detail how the Local Development Plan’s policies are to be implemented and are used in the determination of planning applications

Planning Assessment – The Development Plan

National Planning Framework 4 (2023)

- 4.6. The Scottish Government approved National Planning Framework 4 (NPF4) on 11 January 2023 with adoption formally commencing on 13 February 2023. NPF4 now forms part of the statutory Development Plan and will be used for making decisions on planning applications in Scotland.
- 4.7. NPF4 is the new national spatial strategy for Scotland, which sets out the new spatial principles, regional priorities, national developments and national planning policy. NPF4 carries a host of new provisions inter alia seeking to address the climate change crises and the Scottish Government’s net zero obligations.
- 4.8. NPF4 sets out the Scottish Government’s priorities and policies for the planning system up to 2045 and how the approach to planning and development will help achieve a net zero, sustainable Scotland by 2045.
- 4.9. The ‘National Spatial Strategy’ outlines *“Scotland’s future places will be net zero, nature-positive places that are designed to reduce emissions and adapt to the impacts of climate change, whilst protecting, recovering and restoring our environment.”*
- 4.10. NPF4 details *“The purpose of planning is to manage the development and use of land in the long-term public interest. The decisions we make today will have implications for future generations. Scotland in 2045 will be different. We must embrace and deliver radical change so we can tackle and adapt to climate change, restore biodiversity loss, improve health and wellbeing, reduce inequalities, build a wellbeing economy and create great places.”*
- 4.11. NPF4 seeks to guide future development working towards the set target of net zero emissions by 2045, with significant progress required by 2030. The spatial strategy is a vision based on the following principles:
- sustainable places, where we reduce emissions, restore and better connect biodiversity;
 - liveable places, where we can live better, healthier lives; and
 - productive places, where we have a greener, fairer and more inclusive wellbeing economy.
- 4.12. The ‘Central’ Spatial Planning Priorities identified in Part 1 of NPF4 spans the entirety of the Central Belt, taking in the subject site. The priorities for the ‘Central’ area include:
- accelerate urban greening;

- improve urban accessibility;
- local living and 20 minute neighbourhoods;
- low-carbon, resilient urban living;
- rediscover urban coasts and waterfronts;
- **reuse land and buildings**; and
- reinvent and future-proof city centres - acknowledging that work to diversify the city centres must be progressed now including providing new homes and revitalising places to create a 24 hour city.

4.13. The proposal meets with the aims and vision of NPF4 which focusses on promoting the re-use of buildings, enhancing the vitality and vibrancy of our towns and cities while also encouraging a mix of uses.

4.14. The NPF4 policies that are considered to be of greatest relevance to the proposals are:

Policy 1 – Tackling the climate crises

4.15. Policy 1 encourages development proposals to address and respond to the global climate emergency and nature crisis. It sets out that when considering all development proposals significant weight will be given to the global climate and nature crises.

4.16. The proposal involves the sustainable re-use of existing leisure floorspace, currently in use as a cinema, which is preferable to new/additional purpose built floorspace elsewhere. The proposals also includes the replacement of all lighting and HVAC with energy efficient installations.

Policy 3 – Biodiversity

4.17. The aims set out in Policy 3 are inter alia to ensure development proposals contribute to the enhancement of biodiversity within the site.

4.18. The application site is current an operational cinema that does not contribute any existing landscaping to the local environment and has limited potential for habitats. Given the existing building footprint and town centre location the delivery of enhanced biodiversity measures in this case are not considered appropriate.

Policy 7 – Historic assets and places

4.19. Policy 7 seeks to protect and enhance historic environment assets and places, while enabling positive change as a catalyst for the regeneration of places.

4.20. As established, the premises are Category B listed and therefore the proposal has carefully considered the refurbishment impacts on this key heritage asset. The proposal seeks to preserve the character, special architectural interest and setting of the building and wider conservation area. The internal and external alterations proposed are sympathetic in nature and will ensure the building is preserved for future generations to enjoy its unique offering in the heart of St Andrews. The character of the existing auditorium will be retained through the retention of the existing ceiling, walls and stage features. Externally the alterations proposed are limited to the installation of plant/ventilation equipment related to the proposed kitchen to the rear of the property.

Policy 9 – Brownfield, vacant and derelict land and empty buildings

4.21. Policy 9 'Brownfield, vacant and derelict land and empty buildings' again strongly supports the reuse of existing buildings. In this case, two of criteria in Policy 9 are of explicit relevance:

“(a) Development proposals that will result in the sustainable reuse of brownfield land including vacant and derelict land and buildings, whether permanent or temporary, will be supported.

(d) Development proposals for the reuse of existing buildings will be supported, taking into account their suitability for conversion to other uses. Given the need to conserve embodied energy, demolition will be regarded as the least preferred option.”

4.22. The proposals intend to sympathetically refurbish the existing building to enable occupation by T-Squared Social who are a high quality leisure operator who are committed to retaining core elements of the historic cinema use within the proposals. In doing so, this will have the dual effect of securing the buildings long-term future as an active economic use.

Policy 12 – Zero waste

4.23. Policy 12 'Zero Waste' inter alia outlines that development proposals will be supported where they:

- reuse existing buildings and infrastructure;
- minimise demolition and salvage materials for reuse;
- minimise waste, reduce pressure on virgin resources and enable building materials, components and products to be disassembled, and reused at the end of their useful life;

- use materials with the lowest forms of embodied emissions, such as recycled and natural construction materials; and
- use materials that are suitable for reuse with minimal reprocessing.

4.24. In this regard, the proposal will sustainably utilise the existing building and leisure floorspace while retaining two of the existing cinema screens to maintain the ability to watch movies at the venue going forward.

Policy 13 – Sustainable transport

4.25. Policy 13 outlines support will be given to proposals which encourage, promote and facilitate walking, wheeling, cycling and public transport while reducing the need to travel unsustainably.

4.26. The location of The New Picture House on the edge of St Andrews Town Centre means it is fully accessible by a range of sustainable transport modes. St Andrews Bus Station is located a 7 minute walk from the site which connects St Andrews to the rest of Fife, Dundee, Edinburgh and Glasgow. The site is also within close proximity to a number of locally serviced bus routes with bus stops located on both North Street and St Marys Place. The site is also within a 20 minute walking distance of a large part of St Andrews. It is therefore considered the proposals are wholly capable of promoting active travel opportunities for future site users and there would be no reliance on the private car.

4.27. The proposals will have no vehicle access and be entirely car free.

Policy 14 – Design, quality and place

4.28. The intentions of Policy 14 seeks to encourage, promote and facilitate well designed development that makes successful places by taking a design-led approach and applying the Place Principle.

4.29. Policy 14 under criterion (a) states that proposals will be designed to improve the quality of an area whether in urban or rural locations and regardless of scale. Criterion (b) notes that development proposals should be consistent with the six quality of successful places – Healthy, Pleasant, Connected, Distinctive, Sustainable and Adaptable. Further details on delivering the six qualities of successful places are set out in Annex D (page 141) of NPF4.

- 4.30. The proposals are fully acceptable in terms of criteria (b)/(c) – and indeed the Policy Outcomes – in that they have taken a design led approach to ensure a high quality proposal will be delivered on the site which takes due cognisance of the heritage features within the building and ensures the primary cinema use will be retained going forward despite the significant commercial challenges discussed above.
- 4.31. The proposals, as discussed under Policy 13, are well located and accessible for a range of residents and visitors by active travel transport methods.
- 4.32. The proposals accord with Policy 14 and will encourage, promote and facilitate well designed development that makes successful places by taking a design-led approach and applying the Place Principle.

Policy 15 – Local Living and 20 Minute Neighbourhoods

- 4.33. Policy 15 ensures that development proposals support local living, creating compact and connected neighbourhoods where people can meet the majority of their daily needs within a reasonable distance of their home, preferably by walking, wheeling or cycling or using sustainable transport options.
- 4.34. The proposals deliver a leisure and entertainment use for local residents (including students) of St Andrews to access and enjoy. In doing so, this strengthens the offer of the immediate neighbourhood and ensures that local spend is retained within the town while avoiding unnecessary leakage beyond to other settlements.
- 4.35. It is considered that the proposed development aligns with ambitions for local living outlined within Policy 15

Policy 25 – Community wealth building

- 4.36. Policy 25 seeks to encourage, promote and facilitate a new strategic approach to economic development that also provides a practical model for building a wellbeing economy at local, regional and national levels. Within this local economic development should seek to focus on community and place benefits as a central and primary consideration – to support local employment and supply chains.
- 4.37. Policy 25 under criterion (a) states that proposals will be supported where they contribute to local or regional community wealth building strategies and are consistent with local economic priorities. Examples provided within clause (a) include: improving community resilience and reducing inequalities; increasing spend within communities; local job creation etc.

- 4.38. As detailed in paragraph 3.16-3.19, the following outcomes are considered important when considering the opportunities for community wealth building within the proposals:
- The proposals intend to utilise local supply chains and services; and
 - The proposals will create local job opportunities with the expectation that 40-45 full time equivalent positions will be created.

4.39. As such, in accordance with criterion (a), the proposals would contribute to community wealth building strategies and be consistent with local economic priorities. The proposals are considered to be in accordance with Policy 25.

Policy 27 – City, town, local and commercial centres

4.40. Policy 27 sets out the Scottish Government's priorities with regards to city, town, local and commercial centres. The policy is explicit in stating that *“development proposals that enhance and improve the vitality and viability of city, town and local centres, including proposals that increase the mix of uses, will be supported”*. In doing so, this recognises our town centres are a national asset and measures are required to help centres adapt to long-term economic, environmental and societal changes.

4.41. Criterion (b) elaborates further, stating that *“proposals for uses which will generate significant footfall, including commercial, leisure, offices, community, sport and cultural facilities, public buildings such as libraries, education and healthcare facilities, and public spaces”* will be supported in existing city, town and local centres. When located out with these identified centres, a town centre first assessment is required to demonstrate:-

- all centre and edge of centre options have been sequentially assessed and discounted as unsuitable or unavailable;
- the scale of development cannot reasonably be altered or reduced in scale to allow it to be accommodated in a centre; and
- the impacts on existing centres have been thoroughly assessed and there will be no significant adverse effect on the vitality and viability of the centres.

4.42. In this regard, NPF4 stresses that the town centre first assessment should be applied flexibly and realistically for community, education, health and social care and sport and leisure facilities so that they are easily accessible to the communities they are intended to serve.

4.43. As such, an appropriate sequential assessment has been undertaken within Section 5 of this Statement, demonstrating full compliance.

Policy 30 - Tourism

4.44. Policy 30 'Tourism' aims to encourage, promote and facilitate sustainable tourism developments where community and place enjoy economic, social and cultural benefits from tourism. In terms of Policy 30 criterion (b), it is clear the development will make a sizeable contribution to the local economy and is compatible with the surrounding area in terms of the nature and scale of the activity proposed (see paragraph 2.2), particularly given a cinema operation is to be retained in addition to the complimentary dining and leisure activities to be delivered.

Policy 31 – Culture and creativity

4.45. Policy 31 seeks to encourage, promote and facilitate development which reflects diverse culture and creativity, and supports our culture and creative industries. Ensuring communities have access to cultural and creative activities is of key importance.

4.46. The proposals actively promote the retention of The New Picture House as a cultural venue in the heart of St Andrews by retaining the long-standing cinema use on the site while introducing complimentary leisure and dining opportunities. In doing so, the proposals actively address, through a commercially viable option, the significant challenges facing the existing cinema operation and importantly prevent the loss of this leisure and cultural offer. Consequently, as the cinema element will be retained, through the retention of two screens and associated seating, it is not considered that the policy provisions within Criterion (c) are engaged.

4.47. Overall, the proposals should be viewed positively as a viable solution to ensuring the wider community maintains access to leisure activities, including cinema viewings, in St Andrews.

Local Planning Policy

4.48. The Fife Local Development Plan (LDP) was adopted in September 2017. The LDP identifies the site is within the Central St Andrews Conservation Area and on the edge of the St Andrews Town Centre area.

4.49. The LDP outlines:

“Town centres across the country are in a period of transition. They should be the heart of our communities and so the Local Development Plan strategy and policies support Fife’s town centres as hubs of activity which adapt to changes in their role so they can remain centres for commercial, community, and cultural activity.”

- 4.50. The proposals by T-Squared Social at The New Picture House offer an opportunity to secure a long-term commercially viable operator within this prominent site while ensuring that the core cultural association as a cinema is retained. There is fundamental challenges at play comprising the existing cinema operation and a positive determination of the proposals will contribute towards securing the long term future of this entertainment and leisure use for the wider benefit of St Andrews residents (including students), other local residents elsewhere in north-east Fife and other (regional, national and international) visitors to St Andrews. It is considered that the proposed operation would make a valuable contribution to the town centre’s wider vitality and viability.
- 4.51. An assessment of the proposals against the key policies within the LDP is set out below, together with commentary in relation to the associated Supplementary Guidance (SG).
- 4.52. Policy 1: ‘Development Principle’ explains development proposals will be supported if they conform to relevant LDP policies and proposals, and address their individual and cumulative impacts. This proposal meets criterion Part A 1 (a) which supports the principle of development within a defined settlement boundary when the proposal is compliant with policies for the location. The proposal also conforms to all applicable requirements in Parts B and C of the policy as outlined below.
- 4.53. Policy 3: ‘Infrastructure and Services’ seeks to ensure proposals are designed and implemented in a manner that ensures the required level of infrastructure is in place and the proposals function in a sustainable manner. The proposals involve the re-use of an existing leisure facility in a highly sustainable location within St Andrews. It is considered all necessary infrastructure to facilitate the proposals and enable them to operate sustainably are already in place.
- 4.54. Policy 3 goes on to make it clear that the loss of valuable infrastructure, including viable and valuable cultural, tourism or community resources is not supported. It states *“The Council supports the continued use of community facilities as important focal point for local activity and which serve as valuable employment,*

*tourism and/or local community purpose. Such uses include hotels, public houses, restaurants, and **leisure facilities.***”

- 4.55. As extensively documented, The New Picture House is not a viable business, and is experiencing significant financial and societal challenges which are severely impacting its operation as a traditional cinema. These challenges are not limited to The New Picture House with a host of cinemas across the UK and beyond experiencing similar challenges and facing uncertain futures. Given this prevailing context, it is clear that suitable interventions are required to modernise the entertainment offer while also, importantly, ensuring the core cinema element is retained. This will be advanced through the introduction of complimentary entertainment uses such as competitive sports simulators and through expanded dining opportunities.
- 4.56. T-Squared Social’s proposed development will actively help to safeguard this valuable community facility by retaining a cinema component by maintaining and enhancing the established movie experience at the site. The proposed development will not result in the loss of the cinema, a valued community resource in St Andrews, instead it will elevate the cinema experience within St Andrews and introduce complimentary dining and leisure opportunities which will enhance its attractiveness to St Andrews residents (including students), other local residents elsewhere in north-east Fife and other (regional, national and international) visitors to St Andrews.
- 4.57. T-Squared Social’s proposal will ensure this valuable leisure unit within St Andrews is safeguarded for years to come, providing important employment opportunities (approximately 40-45 FTE positions) and a tourist and community resource in the area. In addition, the refurbishment and construction works will create employment opportunities for local contractors to facilitate community wealth building.
- 4.58. It is therefore considered that the proposals wholly align with the ambitions of Policy 3 and importantly do not result in the loss of valuable infrastructure.
- 4.59. Policy 6: ‘Town Centres First’ outlines that the *“Town Centre will be the first choice for uses likely to attract a large number of people including retail, offices, leisure, entertainment, recreation, cultural, and community facilities.”* Where development cannot be located within a Town Centre sequential analysis will be used to guide development to appropriate locations. As detailed under NPF4 Policy 27, an appropriate sequential

assessment has been undertaken at Section 5 of this Statement, demonstrating full compliance with Policy 6.

4.60. Policy 10: 'Amenity' outlines developments will only be supported if they do not have a significant detrimental impact on the amenity of existing or proposed land uses. Minor external physical changes are involved in facilitating the plant/ventilation associated with the proposed kitchen arrangement. Notwithstanding, the proposals will not result in any adverse visual impacts and no material amenity impacts on privacy, sunlight and daylight. As such, the amenity of neighbouring residents and other occupiers would continue to be safeguarded following approval of the proposals.

Listed Building Consent (ePlanning Scotland Ref: 100666171-002)

4.61. The premises are Category B Listed and are located within the Central St Andrews Conservation Area. The property is identified as a prominent listed building within the St Andrews Conservation Area Appraisal and Management Plan.

4.62. One of the main objectives of the St Andrews Area Strategy within the LDP is to continue to protect the historic town centre, with any new development proposals in and around this area required to complement its historic character.

4.63. Policy 14: 'Built and Historic Environments' states: "*Development which protects or enhances buildings or other built heritage of special architectural or historic character will be supported. Proposals will not be supported where it is considered they will harm or damage:*

- *the character or special appearance of a conservation area, and its setting having regard to Conservation Area Appraisals and associated management plans; or*
- *listed buildings or their setting, including structures or features of special architectural or historic interest;*"

4.64. The historic character, special appearance and historic interest of The New Picture House building and the Central St Andrews Conservation Area is not considered to be at risk of damage or harm as a result of the proposed alterations associated with facilitating T-Squared Social's operations.

- 4.65. The extent of internal alterations includes the forming of a lounge/bar area within the existing Cinema 2, removal of the existing timber framed stepped structure in the main cinema auditorium to create a level floor space and installation of a kitchen and the associated plant equipment within the current backstage area behind the existing Cinema 1 screen. Importantly, key features in the main auditorium including on the ceiling, walls and stage will be retained.
- 4.66. There will be a small extension formed to the rear of the building to provide direct access to the kitchen.
- 4.67. The proposed alterations are considered to be sympathetic to the existing scale and character of the building and wholly in line with the policy requirements of the LDP.

Making Fife's Places: FIFEplan Supplementary Guidance (2018)

- 4.68. The Making Fife Places Supplementary Guidance (February 2018) sets out the Council's expectations for the design of development in Fife. This includes guidance on proposals affecting historic environment designations (listed buildings, conservation areas) including their settings. The guidance builds on Policy 14: 'Built and Historic Environments' stating that new developments in historic environments with any proposed alterations or change of use should be appropriate and follow best conservation practice.

St Andrews Design Guidelines (2007)

- 4.69. The St Andrews Design Guidelines Supplementary Guidance provides more context to Policy 14 of the LDP on sympathetic alterations and signage within the conservation area. These guidelines will be adhered to where possible to ensure the development protects the architectural and townscape qualities of St Andrews.

5. Town Centre First / Sequential Assessment

- 5.1. This section provides appropriate assessment of the proposed development in respect of the town centre first approach / sequential assessment requirements of the Development Plan (NPF4 and Fife LDP), assessing potential for the proposals to be accommodated within suitable gap sites, redevelopment opportunities or existing vacancies.
- 5.2. In this regard, it has been shown that the proposal cannot be reasonably be accommodated at a sequentially preferable location, even when applying flexibility. Clearly, the proposed development is in line with the operational needs of the applicant as operator in order to service the identified commercial opportunity and target market area.

Policy Overview

- 5.3. As set out within Section 4 of this Statement, the planning policy hierarchy establishes a sequential town centre first approach to site selection for town centre uses.
- 5.4. Specifically, NPF4 (Policy 27) directs that development proposals for uses which generate significant footfall (including commercial / leisure uses) will be supported in locations outwith existing city, town and local centres where a town centre first assessment *inter alia* demonstrates that:
- all centre and edge of centre options have been sequentially assessed and discounted as unsuitable or unavailable;
 - the scale of development cannot reasonably be altered or reduced in scale to allow it to be accommodated in a centre; and
 - the impacts on existing centres have been thoroughly assessed and there will be no significant adverse effect on the vitality and viability of the centres.
- 5.5. In this regard, NPF4 stresses that the town centre first assessment should be applied flexibly and realistically for community, education, health and social care, and leisure facilities so that they are easily accessible to the communities that they intend to serve.

5.6. In accordance with NPF4, LDP Policy 6: 'Town Centres First' outlines the Council *"will put town centres first and make them the first choice for a mix of uses including retail, offices, leisure, entertainment, recreation, cultural and community facilities, as well as homes and businesses, healthcare and education facilities."* The sequential approach under LDP Policy 6 outlines that locations should be considered in the following sequence:

- Town centre (within defined boundary)
- Edge of town centre
- Local Centre
- Other Commercial Centres identified in the Local Development Plan
- Out of centre locations that are, or can be, made easily accessible by a choice of transport modes

5.7. The requirement to assess Commercial Centres identified in the LDP is not however consistent with the provisions of NPF4 (commercial centres no longer being within the defined hierarchy with regard to town centre uses). As directed by Section 24(3) of the Town & Country Planning (Scotland) Act 1997, in such instances, NPF4 prevails. There is therefore no requirement to assess Commercial Centres as part of the current Assessment.

Case Law

5.8. There is a substantial body of case law on the sequential approach within the UK, presenting a number of nuances depending on the corresponding proposal / development context. In this regard, while it is appropriate to acknowledge key Court and Inspector/Reporter decisions and findings, the assessment of 'availability' and 'suitability' of sites, and the degree of 'flexibility' to be applied, are matters of planning judgement for the decision-maker according to the circumstances of each case.

5.9. As the Judge concluded in *Warners Retail (Moreton) Ltd v Cotswold District Council* [2016] EWCA Civ 606: *"what bounds can reasonably be set on an applicant's preference and intentions as to 'format and scale' in any individual case will always, and necessarily, depend on the facts and circumstances of that particular case. The policy in paragraph 24 of the NPPF should not be seen as prescriptive in this respect. It plainly is not"*. (Paragraph 30) This is considered to be wholly transferrable to the Scottish context.

- 5.10. Similarly, with reference to his statement in *Aldergate Properties v Mansfield DC* [2016] EWHC 1670 (Admin) Ouseley said: *“Judges may use particular language, but this language is not a substitute for the policy itself. Instead, the language is applying the policy in a particular context. There is a danger that people think that judges are providing a substitute for policy.”* *“Policy interpretations ... may be context and argument specific, and not intended as substitutes for the text at issue for all cases and contexts. The good sense of the planning consequences of any given interpretation may be a guide to its correctness.”* As such, NPF4 and the Fife LDP identified above remain the fundamental points of reference.

Suitability & Availability

- 5.11. The oft-cited, watershed decision was the Supreme Court Judgement (*Tesco Stores Ltd vs Dundee City Council* [2012] UKSC 13), which concluded that *“37. ...It is the proposal for which the developer seeks permission that has to be considered when the question is asked whether no suitable site is available within or on the edge of the town centre.”* Paragraph 38 of the Judgment makes it plain that the sequential test is to be applied in the ‘real world’ and that the issue of suitability is directed to the developer’s proposal, not an alternative scheme which might be suggested by the local planning authority. The broad proposition was however qualified in paragraphs 28 and 29 of his judgement. Paragraph 29 of the judgement explains that, following the foregoing in paragraph 28 *“it would be an oversimplification to say that the characteristics of the proposed development, such as its scale, are necessarily definitive for the purposes of the sequential test ... [29] ... the applicant is ... expected to have had regard to the circumstances of the particular town centre, to have given consideration to the scope for accommodating the development in a different form, and to have thoroughly assessed sequentially preferable locations on that footing. Provided the applicant has done so, however, the question remains, as Lord Glennie observed in Lidl UK GmbH v Scottish Ministers [2006] CSOH 165, para 14, whether an alternative site is suitable for the proposed development, not whether the proposed development can be altered or reduced so that it can be made to fit an alternative site.”*
- 5.12. The Dundee decision established in respect of suitability that in terms of the size of alternative sites, provided that an applicant has demonstrated appropriate flexibility with regards to format and scale, the question is whether the alternative site is suitable for the proposed development, and not whether the proposed development could be altered or reduced so that it can be made to fit the alternative site.

5.13. In considering an appropriate timescale for the assessment of ‘availability’, the Inspector at the 2014 Rushden Lakes decision advised: *“In terms of availability, NPPF [24] simply asks whether town centre or edge of centre sites are ‘available’. It does not ask whether such sites are likely to become available during the remainder of the plan period or over a period of some years.”* (Paragraph 8.55 of Inspectors Report, DCLG ref APP/ G2815/V/12/2190175)

Sub-division / Disaggregation

5.14. It is also appropriate to clarify that there can be no requirement for “sub-division” of proposals (or “disaggregation”) in undertaking a sequential assessment for the proposal.

5.15. A key ‘call-in’ decision was respect of an application by LXB RP (Rushden) Limited to provide for large-scale retail development at land adjacent to Skew Bridge Ski Slope at Rushden Lakes (Planning Inspectorate DCLG ref: APP/G2815/V/12/2190175). Paragraph 8.46 of the Inspector’s report notes that: *“what the sequential test seeks is to see whether the application, i.e. what is proposed, can be accommodated on a town centre site. There is no suggestion here that the sequential test means to refer to anything other than the application proposal. So Dundee clearly applies to the NPPF.”* Paragraph 8.47 of the Inspector’s report goes on to confirm that that disaggregation no longer forms part of national planning policy: *“If it had been intended to carry on with the requirement then all that would have been required is the addition of the word “disaggregation” at the end of the NPPF.”*

5.16. It is noted that the Dundee case required sub-division to be *considered*. Notwithstanding, this Judgement was at a time when the now superseded NPPG8 was still in force, which at Paragraph 13 contained the now superseded instruction that applicants *“should consider the scope for accommodating the proposed development in a different built form, and where appropriate adjusting or sub-dividing large proposals, in order that their scale might offer a better fit with existing development in the town centre”*. In addition to the fact that this judgement was in relation to a retail proposal, the sub-division provision has since been removed from SPP – itself since replaced by NPF4 – and as such, there are clear parallels with the Rushden Lakes ‘call in’ above.

5.17. The ‘Scotch Corner Decision’ (S77 Inquiry relating to application for Designer Outlet Centre on land west of A618 Barracks Bank, Scotch Corner, North Yorkshire, DCLG refs APP/V2723/V/15/3132873 &

APP/V/16/3143678) (December 2016) similarly concluded that sub division was not appropriate to demonstrate flexibility, recognising that the Designer Outlet Centre business model requires units of a certain scale, and appropriately controlled by conditions to regulate use.

- 5.18. Clearly, the above relate to retail proposals (as opposed to leisure proposals), which strengthens the position that any logical interpretation of the conclusions mean that there can be no requirement to consider disaggregation in this assessment as the commercial floorspace is fully ancillary to the main Class 11 use.

Application of the Sequential Approach to The Proposals

- 5.19. A sequentially preferable site is one that is both available and suitable for the proposed use. In summarising the key policy provisions in the context of the proposals, as clarified by the relevant case law, the tests are:

- **Availability** – whether sites are available now or, in being robust, are likely to become available for development within a reasonable period of time having regard to the urgency of the need that exists in any particular case.
- **Suitability** – whether a site could be developed for the proposed development having due regard to site characteristics (location, size, shape, topography, land use allocation, status [vacant or occupied] and accessibility) and approximate size, type and range of goods of the retailer or the defining features / specific operational characteristics of the specific leisure / miscellaneous use. Clearly, while individual corporate trading styles, attitudes or preferences should not dictate suitability, there is a requirement for reasonableness in any alteration/reduction of that proposed and both flexibility and realism to deliver development in appropriate locations. Any application of realism, in determining if an alternative site is suitable i.e. whether there is a reasonable prospect that the development will occur on the site at a particular point in time, cannot exist in a vacuum and must have regard to the market realities operators are working within; the opportunity, need or demand which the proposal is intended to meet; the interplay between uses proposed; and, the end environment that would be created following implementation of the proposals.

- 5.20. The type of development assessed sequentially should in essence be the same as the type proposed in the application and be capable of viably facilitating the requirements of operators in order to actually deliver on the proposal (as opposed to simply an unwillingness to depart from standard formats or corporate attitudes

of any given retailer/operator). It follows therefore that it is not appropriate for the determining authority to require the applicant to fundamentally change the type of development in order to make it fit other sites or premises.

Site Status and Area of Search

5.21. Adopted planning policy confirms that The New Picture House site is located on the edge of the St Andrews Town Centre area. As per the sequential approach table within Policy 6 of the LDP, edge of town centre sites are to be considered second, only after sites within the defined town centre boundary.

5.22. This sequential assessment therefore only considers sites within the St Andrews Town Centre and accordingly assesses and discounts those sequentially preferable to The New Picture House site. The core target market aligns with wider St Andrews and it is not considered appropriate to extend the area of sequential search beyond St Andrews Town Centre to other nearby settlements.

Sequential / Town Centre First Assessment – St Andrews Town Centre

5.23. The catchment area of search identified below comprises a robust and appropriate study extent given the vast majority of visitors will be drawn from this identified area.

5.24. Indeed, the development will mainly attract visitors, students, and residents of St Andrews. The application site in this instance enjoys access to a large immediate walk-in population from hotels, short term lets, B&Bs and student accommodation in the immediate surrounding area alongside established residential areas. The operational requirement - i.e. provide walkable day/evening entertainment options to the local community and visitors in St Andrews - is a well-established consideration for the delivery of these operations.

5.25. Correspondingly, the assessment considers the key vacancies and potential development sites within and on the edge of St Andrews Town Centre. No other centres will be considered within this assessment as a key suitability criteria of the proposed development is to be within walking distance of St Andrews Town Centre.

Alternative Site Assessment - St Andrews Town Centre

5.26. St Andrews is the only Town Centre within the catchment. It is a vibrant, traditional town centre characterised by small and medium sized shops, predominately located in ground floor units. The town centre hosts a number of speciality shops and local, independently run businesses, meeting a demand from the surrounding residential area.

5.27. The current key vacancies, as verified by way of site visit, comprise:

- 1 Greyfriars Garden (70 sq.m)
- 56 Market Street (160 sq.m)
- 62 Market Street (132 sq.m)
- 64 Market Street (50 sq.m)
- 100 Market Street (120 sqm)
- 106-108 Market Street (142 sq.m)
- 132 Market Street (230 sq.m)
- 35A Bell Street (91 sq.m)
- 76 South Street (197 sq.m) - [Ref: 23/02756/FULL – redevelopment proposals approved January 2024]
- 107 South Street (270 sqm)
- 121-125 South Street (279 sq.m)
- 205B South Street (60 sq.m)
- 11-13 Crails Lane (130 sq.m)

5.28. As such while there are vacancies in the Town Centre, even the larger ones are restricted in their floorplate extent, and the majority being some way off a sufficient scale to accommodate the development proposals. Moreover, there is no location where there is a collection of units that could be combined to form a sufficiently large leisure unit. As a result there are no vacant premises within the St Andrews Town Centre which are available, or expected to become available, and capable of suitably accommodating the proposal.

5.29. As such, there are no vacancies within the Town Centre to accommodate the development proposal.

Economic & Environmental considerations

- 5.30. For operation the proposal will employ circa. 40-45 Full Time equivalent (FTE) jobs in a range of roles.
- 5.31. Local supply chains, suppliers and workers will overwhelmingly be utilised in the fit out, minimising the environmental impact of transporting goods and of staff and visitors travelling to the location.

Conclusion

- 5.32. The sequential assessment undertaken has demonstrated that there are no sequentially preferable vacancies or development sites within the area of search which are available or suitable to accommodate the proposals. The proposals would provide new local employment in the supply chain, fit out and in operation of T-Squared Social.
- 5.33. As such, the Sequential Approach / Town Centres First Assessment policy provisions are met and the proposals accords with LDP Policy 6 and NPF4 Policy 27.

6. Conclusions

- 6.1. This Planning Supporting Statement has assessed the proposed part use of the subject cinema premises to include ancillary Class 3 (Restaurant), Class 11 (Leisure) and Sui Generis (Public House) uses against national and local planning policy.
- 6.2. NPF4 (2023) supports a diversity of uses where they contribute to footfall and city centre vitality, viability and vibrancy. The proposals are in accordance with this policy provision, due to the site's location on the edge of the designated town centre, and will make a valuable contribution to the area and the footfall drawn to it, benefitting the surrounding units within the town centre. The proposal also satisfies Policy 31 as it allows for the retention of a valued community facility (namely the cinema) within St Andrews, which would otherwise be lost, while providing an additional tourism/community facility in the area. The proposal is also in line with Policy 1, 9, 12 and 18 as the development will sustainably re-use an existing building in an area supported by sustainable transport links.
- 6.3. The proposal meets with Policy 1 of the adopted LDP as the principle of development is supported in this area by LDP policies. Policy 6 requirements have also been fulfilled through the inclusion of a Town Centre First analysis within this supporting statement which found the site is an appropriate sequential site to the town centre.
- 6.4. The proposed internal and external alterations are solely associated with facilitating T-Squared Social's operation. As such, the proposal will have no adverse impact on the Category B Listed building or the character of the Central St Andrews Conservation area, meeting Policy 7 of NPF4 and Policy 14 of the LDP. Accordingly, the proposals satisfy the statutory tests set out within the Planning (Listed Building and Conservation Areas)(Scotland) Act 1997.
- 6.5. Given the foregoing, it is respectfully requested that Fife Council assess the submitted applications favourably and that planning permission and listed building consent is forthcoming.

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