



Arthur Stone Planning  
& Architectural Design

85 High Street  
Newburgh, KY14 6DA

Tel: 01337 840088



www.arthurstoneplanning.co.uk  
info@arthurstoneplanning.co.uk

Ms Pam Ewen  
Head of Planning  
Economy, Planning & Employability Services  
Fife Council

By email: [development.central@fife.gov.uk](mailto:development.central@fife.gov.uk)

16<sup>th</sup> October 2020

Dear Ms Ewen

## **Town and Country Planning (Environmental Impact Assessment) (Scotland) (Regulations) 2017**

### **Request for Screening Opinion**

#### **Proposed mixed use development including approx. 180 residential units (including affordable housing), holiday lodges, associated access, open space, landscaping, SuDS and other infrastructure at Prestonhill Quarry, Inverkeithing**

We are acting on behalf of DDR (UK) Ltd who intend to make a future planning permission in principle application for the above development at Prestonhill Quarry, Inverkeithing. This is a formal request to Fife Council for a Screening Opinion under Regulation 8 (1) of the Town and Country Planning (Environmental Impact Assessment) (Scotland) (Regulations) 2017. DDR (UK) Ltd are seeking the Council's view on the requirement for Environmental Impact Assessment as part of the decision making process.

We have referred to the assessment criteria in Schedule 3 of the 2017 Regulations and the guidance in the related Circular 1/2017 in preparing this submission.

EIA may be required if the proposal is considered to have 'significant effects on the environment by virtue of factors such as its nature, size or location' (Circular 1/2017, para 18).

Reference has also been made to earlier pre application advice received from the Council for a mixed leisure/residential proposal (19/00784/PREAPP). This indicated that a Screening Opinion should be sought from Fife Council.

A location plan outlining the site boundary is submitted along with this letter.

Should the Council's opinion be that EIA is not required for this proposal it is the applicant's intention that a future application will be fully supported by a Masterplan and Design and Access Statement along with specialist reports, to ensure appropriate mitigation of any impacts.

### **Requirement for EIA**

The proposed development is not Schedule 1 development, always requiring EIA. However, it is of a type listed in Schedule 2 of the 2017 Regulations (10b), being an urban development project over 0.5ha.

We note that the Circular (paragraph 19) clarifies that *'urban development...embraces residential development (houses and flats) as well as what might be regarded as development of a more obviously urban nature'* and that *'the term "urban" applies not only to development which is to be sited in an already existing urban area. It could apply to development proposed for out of town or even rural areas which might have an urbanising effect on the local environment'*.

The development site is not within any of the listed 'sensitive area' but, as referred to in paragraph 38 of the Circular, we recognise that for the purposes of reaching the screening determination it is relevant that the site is close to internationally, nationally and locally important natural and cultural heritage sites. These are detailed in the included Screening Checklist, below.

The Circular clarifies that the screening process ensures that EIA is only undertaken for projects likely to have significant effects on the environment. The requirement is to clearly and succinctly set out the information specified in Regulation 8, taking into account, where relevant, the selection criteria in Schedule 3 to the Regulations (Appendix A).

Regulation 8 (2) requires that the screening request must be accompanied by:

- (a) a description of the location of the development, including a plan sufficient to identify the land;
- (b) a description of the proposed development, including in particular –
  - i a description of the physical characteristics of the proposed development and, where relevant, of demolition works;
  - ii a description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- (c) a description of the aspects of the environment likely to be significantly affected by the proposed development; and,
- (d) a description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from –
  - i. the expected residues and emissions and the production of waste, where relevant;
  - ii. the use of natural resources, in particular, soil, land, water and biodiversity.

A location plan is submitted, outlining the site boundary in red, to meet the requirement of point (a). A Screening Checklist is included below which addresses the requirements of point (d) i and ii. Point (b) i and ii and (c) are addressed both in the Screening Checklist and the paragraphs below in this letter.

## **The Proposal**

The site has a total area of approximately 45ha. Built development, wholly residential, will be contained predominantly on the brownfield land of the former quarry, (approx. 11ha).

The proposed development will include the regrading of the quarry topography and infilling (partially or wholly) of the water body, using rock from the regrading operation. The aim is to create a site able to accommodate the proposed residential and holiday lodges while maintaining and enhancing the opportunity for public recreation in the area and the site's environmental value. Removing the significant hazards associated with the quarry walls and water body are of paramount importance in the overall aim in developing the site. The proposal for the detailed engineering works, including the provision of access to the site, is currently progressing through the design process, supported by specialist assessment work.

The proposal is in the early stages of the design process and at this point it is anticipated that the site can accommodate 180 residential units, including a mix of dwellinghouses and flats, with affordable housing (45 units) included. It is proposed that holiday lodges will be located on land between the quarry edge and Letham Hill Wood, potentially accommodating 8 – 10 units.

It is anticipated that Sustainable Urban Drainage for the development can be accommodated within a wider area of open space, centred around the infilled, or partially infilled, water body.

Substantial areas of open space, landscaping and active travel routes will be included within the quarry area and coastal edge, recognising that the area is currently widely used by the public, including the Coastal Path, National Cycle Network Route 76 and Core Paths. The proposal recognises that Letham Hill Wood is an important feature, providing a high quality landscape setting (including separation between Inverkeithing and Dalgety Bay), valuable woodland habitat and important recreational space. The Wood will be protected, and enhanced, as an asset for the communities of Inverkeithing and Dalgety Bay.

It is anticipated that the Pre Application Consultation process will provide valuable input from the community to inform the design process in relation to future recreational and access use within the site.

There is a row of individual lock up garages located to the south west of the site, used by the properties on Preston Terrace. It is anticipated that these will be removed as part of the development of the site with the project providing an opportunity for improved parking and amenity for the existing properties on Preston Terrace.

## **The Location and Physical Characteristics of the Proposal**

The proposal site includes:

- the area generally known as Prestonhill Quarry, a dolerite quarry shown on late 19<sup>th</sup> century mapping and believed to now have been unused for more than 40 years, and
- Letham Hill Wood, an area of mixed deciduous woodland (subject of Fife Council Tree Preservation Order W0036)

The entire site extends for more than 2km with its width varying from around 100m – 250m along its length. The southern area of the site, occupied by Prestonhill Quarry, lies adjacent to Inverkeithing Bay and the river Forth and to the south east of Inverkeithing. Turning inland and to the north, Letham Hill Wood bounds the western edge of Dalgety Bay and forms more than two thirds of the total site area.

Letham Hill Wood is an area of dense mixed deciduous woodland on the hill lying between Dalgety Bay and Inverkeithing. It is bounded to the north by Hillend and the A921 to the north and the coast to the south where it adjoins the Quarry area. It is an important landscape feature, reaching a height of 95m, and contributing to the landscape setting of Dalgety Bay and Inverkeithing and providing separation between the settlements. The hill is highly visible in the local area and from the wider area around the Forth, including the Rail Bridge and South Queensferry.

To the east of Letham Hill Wood lies the extensive housing area of west Dalgety Bay. The western edge of the Wood bounds sloping agricultural land extending towards Spencerfield, Hillend Road and the A921.

The housing areas of Fraser Avenue, Spencerfield Road and the ongoing housing development at Spencer Fields are located to the north of the quarry part of the site. An area of farmland and areas of open space separate the quarry from these housing areas of the town to its north. A small part of the site, forming an offshoot to its north includes an area of former allotments, in the Council's ownership, and included in part of the masterplan proposal for the Council's redevelopment of Fraser Avenue. This area provides a potential access to the north of the site from Fraser Avenue. The quarry area of the site is accessed from Preston Crescent, to the west, along a surfaced track/path running west to east towards Dalgety Bay (providing the National Cycle Route and used as a section of the Fife Coastal Path).

The western edge of the quarry area is adjacent to a site occupied by Stone Marine Services, providing facilities for the maritime industry, including stevedoring. The north west edge of the quarry area is bounded by the properties forming Preston Terrace.

The quarry area, including the steep cliffs cut into the hill and the void, including the water contained in the void in its west end, show clear evidence of the past quarrying. There are also areas of loose rock and spoil from the operations within the area of the quarry. A disused metal conveyor belt structure extends into the Forth, associated with the former transfer of quarried material onto ships. There is an unused concrete pier/landing stage area to the east of the conveyor. There are also the remnants of former roads/tracks sufficient to currently enable vehicle access along the south side of the quarry and to its east end.

The quarry area stretches from the coastal edge to the south and rises to heights of approx. 25m-30m above the cliff edge of the quarry with the highest land towards the east end. The land

towards the coastal edge, to the south of the hill, has the appearance of a former industrial use, although there is now colonising vegetation across this area. The upland areas of the quarry area, to the west and east, more distant from the previous quarrying are grassland with some areas of scrubby trees. Much of the scrub across the site has colonised since quarrying ceased. Historical ecological assessment work for the site found no evidence of protected species or important habitat. The forthcoming application will be supported by full ecological assessment.

The Fife Coastal Path route passes through the site along with the National Cycle Route 76 'Around the Forth'. There are also several identified Core Paths. Other informal routes are taken throughout the site.

Details of the environmental sensitivities associated with the site are included in the attached Screening Checklist.

Parts of the site have been fenced in the past to exclude the public for reasons of safety, although this fencing is largely in poor condition and clearly it has been continually breached. There is various warning signage throughout the area erected by Fife Council. The quarry has been the site of several fatal tragedies in recent years and there is much concern in the community that the safety of the quarry must be addressed.

## **Conclusion**

Having completed the Screening Checklist and considered the location and physical characteristics of the proposal we believe that the proposal will have significant positive effects in terms of public access, habitat improvements and public safety. Otherwise, it is anticipated that appropriate mitigation during and after construction will ensure that the proposal has no significant effects on the environment, taking into account its nature, size, and location in relation to environmental sensitivities and that EIA is not required.

We believe that the intended planning application and its masterplan and design and access statement, fully supported by a range of specialist supporting information, will provide detailed information to enable the Council's assessment of the application.

We will be grateful for the Council's consideration of this Screening Request and look forward to receiving the Council's Screening Opinion in due course.

Yours sincerely

Arthur Stone Planning & Architectural Design

Enc.

## EIA Screening Assessment Checklist for Prestonhill Quarry – criteria as set out in Schedule 3 of the 2017 Regulations

(based on Scottish Government template)

Selection Criteria	Yes/No	Briefly describe potential impact	Is this likely to result in a significant effect?
<b>I. Characteristics of the Development</b>			
<b>(a) Size and design of the development</b>			
Will the proposed development be out of scale with the existing environment?	No	The proposed built development, reusing a derelict industrial site, will form an extension of an existing sizeable urban area, currently also being further extended with housing development at Spencerfield. The proposal can achieve good connectivity and integration with the urban area of Inverkeithing and Dalgety Bay and with the wider green network. The design and layout of the site along with landscaping, open space and access will ensure that the overall proposal is appropriate to its setting and will not be out of scale with the adjacent urban area	No
<b>(b) Cumulation with other existing and/or approved development</b>			
Will the proposed development lead to further consequential development or works?	Yes	There will be some consequential development in terms of infrastructure provision.	No
Are there potential cumulative impacts with other existing development, approved developments or developments the subject of valid applications?	Yes	There may be potential cumulative impacts with ongoing residential development at Fraser Avenue (15/03844/PPP) and Spencerfield (15/01147/PPP), including in relation to infrastructure capacity.	No
Should the application for the proposed development be regarded as an integral part of a more substantial project? If so, can related developments which are subject to separate applications proceed independently?	No	The PPP application will be for the entire site which will then be the subject of future further detailed applications.	No

Selection Criteria	Yes/No	Briefly describe potential impact	Is this likely to result in a significant effect?
<b>(c) Use of natural resources, in particular land, soil, water and biodiversity</b>			
Will the proposed development use natural resources such as land, water, materials or energy, especially any resources which are non-renewable or are in short supply?	Yes	The proposal will use a range of natural resources in its development. These will include the re-use of the former quarry (brownfield land included in the SVDLS) and the infilling of the quarry void water body. Although the quarry retains an existing hard rock resource it is believed that the need to protect this resource is countered by the environmental constraints on any future quarrying in this location. The available rock will provide an onsite resource for the proposed development. A range of construction materials will be used in the development along with water and energy. None of the resources are likely to be in short supply. Use of resources in the proposed development will be guided and controlled by best practice and regulation.	No
<b>(d) Production of waste</b>			
Will the construction, operation or decommissioning of the proposed development produce wastes?	Yes	Waste will be created during regrading of the quarry and construction. A site waste management plan will address waste disposal. On site recycling of stone as part of the engineering of the site will ensure that minimal material is removed from site.  The residential development will produce normal household wastes. Provision for the collection and recycling of this waste, to meet the Council's standards, will be addressed in the detailed design stage of the proposal.	No
<b>(e) Pollution and nuisances</b>			
Will the construction, operation or decommissioning phases of the proposed development release pollutants or any hazardous, toxic or noxious substances to the air?	Yes	During development, fuel, construction, and other materials may be stored and will be used on site. Dust and fumes may be produced during construction. These issues will be controlled by regulation and best practice to ensure there are no significant effects on air quality.  An air quality impact assessment will be undertaken.	No
Will the construction, operation or decommissioning of the proposed development lead to risk of contamination of land or water from releases of pollutants?	Yes	During development fuel, construction and other materials may be stored and will be used on site. These will be stored and used as required by regulation and best practice to ensure there are no significant effects on land or water.  A contaminated land site specific risk assessment will be carried out for the site and its outcome will determine any remedial measures required, to be agreed with the Council.	No

Selection Criteria	Yes/No	Briefly describe potential impact	Is this likely to result in a significant effect?
Will the construction, operation or decommissioning phases of the proposed development cause noise, vibration or the release of light?	Yes	<p>Noise, vibration, and release of light will occur during the preparation of the site (including quarry regrading and demolition of the lock up garages) and during construction operations. This will include from vehicles, machinery, and equipment. These can all be controlled, including working hours, methods employed, specification of equipment used, through planning conditions and compliance with regulation and best practice.</p> <p>Once developed the site will release light from residential development and noise from associated traffic. This can be controlled through the design, along with best practice and appropriate planning conditions.</p>	No
<b>(f) Risk of major accidents and/or disasters which are relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge</b>			
Will there be any risk of accidents during construction, operation or decommissioning of the proposed development which could affect the environment or human health?	Yes	<p>There will be risk of accidents associated with the regrading of the quarry and construction on site. These will be associated with construction traffic, machinery and equipment, engineering operations to regrade the quarry and potential pollution from fuel, oil, and other materials. Operations, construction, including storage of materials, will be carried out in line with regulation and best practice.</p> <p>Once developed the proposal will be subject to the normal risks associated with residential development, access, open space, and the associated infrastructure. The significant risk of accidents associated with the existing quarry cliffs and deep water body will be removed.</p> <p>There is potential risk from coastal flooding, as advised by Fife Council Harbours, Flood and Coast with reference to the SEPA Flood Map. A Flood Risk Assessment will be prepared.</p>	Yes – significant positive impact in removing risks associated with the quarry.



Selection Criteria	Yes/No	Briefly describe potential impact	Is this likely to result in a significant effect?
<b>(g) Risk to human health</b>			
Will the construction, operation or decommissioning phases of the proposed development involve the use, storage, transport, handling or production of substances or materials which could be harmful to human health?	Yes	<p>There is potential for impacts from the construction and operation of the future development which could be harmful to human health, in terms of environmental pollution from normal related activities.</p> <p>These will be fully addressed through detailed assessment in the planning process and controlled through design, planning conditions, regulation, and best practice.</p>	No

Schedule 3 Selection Criteria	Yes/No	Briefly describe potential impact	Is effect likely to result in a significant effect?
<b>Location of the Development</b>			
<b>(a) Existing and approved land use</b>			
Are there existing and/ or approved land uses in the locality of the proposed development site which could be affected by the proposed development?	Yes	<p>The site is currently a disused quarry. The proposal will remove any potential for future quarrying. The site is informally used for recreation and in addition contains the Fife Coastal Path, the N76 National Cycle Network route 'Round the Forth' and other core paths and includes the coastal edge and Letham Hill Woods.</p> <p>There is a business use adjacent to the west end of the site, Stone Marine Services. Residential development adjoins the quarry area of the site at its north west corner and to the north site, although not adjoining. Letham Hill Wood bounds the western, residential, edge of Dalgety Bay. Agricultural land adjoins the western edge of the Wood.</p>	No
<b>(b) Relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground</b>			

<p>Are there any areas on or around the location of the proposed development and its underground which contain important, high quality or scarce resources which could be affected by the proposed development?</p>	<p>Yes</p>	<p>The quarry contains a mineral resource which will be removed by the development. However, its rock resource is not scarce and, in any case, will be used in the development of the site, reducing the need for imported material. There would be significant environmental implications in attempting to restart commercial quarrying at this site.</p>	<p>No</p>
<p><b>(c) Absorption capacity of the natural environment</b></p>			
<p>Are there any areas on or around the application site that are protected under international or national legislation for their ecological, landscape, cultural heritage or other value which could be affected by the construction, operation or decommissioning of the proposed development?</p>	<p>Yes</p>	<p>The site is bounded by the coast and is close to the Firth of Forth Special Protection Area (including Ramsar Site) and Site of Special Scientific Interest. The length of coast within the site is not covered by these designations.</p> <p>Letham Hill Wood, a mixed deciduous woodland, covering around 26ha, is subject to a TPO (W0036). The quarry area of the site contains areas of scrubby trees. Neither the scrub, or Letham Hill Wood are identified by the Native Woodland Survey of Scotland (Forestry Commission Scotland 2014) which identifies native, nearly native woods and woods planted on ancient woodland sites.</p> <p>The Firth of Forth SPA (also an internationally important Ramsar Site) and SSSI is designated for its birds which use the inter-tidal mud flats. The citation for the Firth of Forth SPA describes it as <i>'a complex of estuarine and coastal habitats in south east Scotland stretching from Alloa to the coasts of Fife and East Lothian. The site includes extensive invertebrate-rich intertidal flats and rocky shores, areas of saltmarsh, lagoons and sand dune'</i>. The qualifying importance of the SPA relates to its support for populations of birds. The conservation objectives for the SPA are to avoid deterioration of the habitats of qualifying species or significant disturbance, ensuring the maintenance of the integrity of the site.</p> <p>The length of coastal edge adjacent to the site is not covered by the designation. Previous (2000) information provided by Fife Nature shows that there is only one small discrete area of mud flat habitat in the area adjacent to this site. In any case, the proposal will not extend into the inter-tidal area and it is not anticipated that the proposed development will impact on the inter-tidal area or the mud flats of the wider protected area and their ability to support the wintering bird population. The proposal will deliver habitat improvements and enhanced public access.</p> <p>All necessary measures will be taken in the design of the proposal and future construction and occupation to ensure that there are no significant impacts on the natural heritage assets of the Forth.</p>	<p>No</p>

		<p>It is anticipated that the proposed development will alter the areas which are currently bare or partly colonised ground, grassland and scrub, all subject to the former quarrying operation. Proposals will include considerable planting and biodiversity enhancement.</p> <p>The site is within two view cones of protected views of the Forth Rail Bridge World Heritage Site. Detailed assessment will be carried out to consider the potential impacts of future development in the design process.</p> <p>Detailed assessment work will be carried out to address all these above factors which will then be taken forward into the design process. If necessary appropriate mitigation and compensatory arrangements will be ensured.</p>	
<p>Are there any other areas on or around the location which are important or sensitive for reasons of their ecology which could be affected by the proposed development? Particular attention should be paid to the following areas:</p> <p>(i) wetlands, riparian areas, river mouths;</p> <p>(ii) coastal zones and the marine environment;</p> <p>(iii) mountain and forest areas;</p> <p>(iv) nature reserves and parks.</p>	Yes	As above.	No
<p>Are there any areas on or around the location which are used by protected, important or sensitive species of fauna or flora which could be affected by the proposed development?</p>	Yes	As above.	No
<p>Are there any groundwater source protection zones or areas that contribute to the recharge of groundwater resources which could be affected by the proposed development?</p>	None known		

Are there any areas on or around the location of the proposed development where environmental quality standards are already exceeded which could be affected by the proposed development?	None known		
Are there any areas on or around the location which are densely populated which could be affected by the proposed development?	Yes	<p>The site lies adjacent to the south of Inverkeithing, a medium sized town with a population of around 5 000 and to the west of Dalgety Bay, with a population of around 10 000.</p> <p>The proposal will form an extension, of appropriate scale, to the Inverkeithing urban area. The built development will maintain its separation from Dalgety Bay, with the protection and enhancement of Letham Hill Wood, including measures for public access. There is the potential for impacts on local facilities and services. All requirements for contributions to infrastructure will be provided through planning obligations related to a consent. There are opportunities for the future residents of the housing development to provide support to the local town centres and surrounding businesses.</p>	No
Is the proposed development in a location where it is likely to be visible to many people?	Yes	<p>The site contains the Fife Coastal Path and National Cycle Route 76, several Core Paths and informal paths used for recreation. The site is also viewed from various landward locations in the Inverkeithing and Dalgety Bay area, coastal locations around Inverkeithing Bay and from the wider Forth area, including North Queensferry and the Forth Rail Bridge.</p> <p>Detailed site appraisal and a Landscape and Visual Impact Assessment will be carried out to assess the visual impact of the proposal on the wider area and to ensure a proposal, demonstrated through a Design and Access Statement, which is responsive to this unique site with its quarry topography and coastal location.</p>	No
Are there any routes or facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the proposed development?	Yes	<p>The site contains the Fife Coastal Path and National Cycle Route 76, several Core Paths and informal paths used for recreation. There is the potential for these routes to be affected during construction operations and on completion of the operations. The site is included within the INVGN01 Inverkeithing Bay and the DGBGN02 Dalgety Bay to Fordell Green Network Policy Areas where the Council identifies opportunities for enhancement, including to the setting and route of the existing Coastal Path and cycle routes</p> <p>The proposal will provide opportunities for enhanced public access and recreation and these will be fully addressed in the design process and in submissions to support the planning application.</p>	Yes – potential for positive impact.

<p>Are there any areas of local landscape or scenic value on or around the location which could be affected by the proposed development?</p>	<p>Yes</p>	<p>The site is within the FIFEplan Local Development Plan 2017 designated Letham Hill Local Landscape Area (with the exception of the quarry area at the west end)</p> <p>Detailed site appraisal and landscape and visual impact assessment will be carried out to inform the design process.</p>	<p>No</p>
<p>Are there any areas of features of historic, cultural or archaeological value on or around the location which could be affected by the proposed development?</p>	<p>Yes</p>	<p>There is some cultural heritage associated with remnants of the quarry operation (including the conveyor on the shore).</p> <p>Detailed assessment work will be carried out to address these issues and to propose appropriate mitigation and compensatory arrangements if required.</p>	<p>No</p>
<p>Is the proposed development location susceptible to earthquakes, subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions?</p>	<p>Yes</p>	<p>Fife Council's Harbours, Flood and Coast have advised that the SEPA Flood Map shows that the development site is encroached by the coastal flood risk envelope. A Flood Risk Assessment and Drainage Strategy will be prepared. It is anticipated that, if required, appropriate mitigation can be achieved to remove risks from flooding.</p>	<p>No</p>