



Royal Burgh of St. Andrews Community Council

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The Secretary
The Scottish Executive Development Department
Planning Services Division
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Victoria Quay
Edinburgh
EH6 6QQ

16 July 2006

Dear Sir/Madam,

The Finalised Fife Structure Plan 2006

1. I write on behalf of the Community Council to object to the Finalised Fife Structure Plan. It is indeed a “Finalised” Plan in only the most technical of senses. This is not a Plan built on a firm policy base carefully developed by officials over many years and finely honed in the light of public response. Rather it is an unnecessary Plan, conceived as a short-term manoeuvre in response to the prospect of City Regions. It is a Plan which is arrogantly dismissive of earlier work by Fife Council itself and which has remained largely impervious to the huge public outcry it has provoked. The manner of its production has been procedurally dubious, and a major plank - the concept of Strategic Development Areas – has been subject to no previous public scrutiny. The policies in this Structure Plan would be so damaging to the interests of our own community and to those of Scotland that we believe this exceptional situation necessitates an Examination in Public.

2. The public could be forgiven for thinking that every step possible has been taken to confuse them or distract them during the production of the Plan. The consultation on the draft Plan was timed to coincide with that on five other important documents. One of these was the draft St Andrews and East Fife Local Plan, a further draft of which has been issued recently. Some of those treated favourably by it will have been misled into thinking the matter was settled, and will not therefore submit the objections to the Finalised Structure Plan that the latter on its own would have provoked.

3. To endorse this Finalised Fife Structure Plan (FFSP) would be to concede that over the next twenty years the Scottish Executive will fail to address some of the most major problems facing the country. The Plan implies the poaching of population by Fife from adjacent areas of Scotland, and, in particular, acquiescence in the long-term decline of Dundee. Its vision for 2026 is so divorced from any environmental agenda that it is happy to contemplate the prospect of Methil being “home to an increasing number of affluent commuters to Edinburgh”. The Report of Survey (RoS para. 1.21) displays the same alarming candour in saying of Edinburgh commuters that “the aim is to increase the numbers that travel from Mid Fife”. The FFSP effectively envisages a Fife of dormitory settlements for cross-Forth and cross-Tay commuters. Although the Transportation section of the FFSP (para. 3.60) pays the usual lip service to the principle of guiding development to locations which will “reduce the need to travel by private car”, this principle has clearly made no impression at all on the mind-set of those who conceived the major strategies of this Plan. In supporting long-distance commuting, the FFSP announces that Scotland will fail for the foreseeable future to grasp the green agenda seriously, and will fail to make appropriate use of the planning system in attempting to cut the emission of greenhouse gases.

The need for an Examination in Public

4. We are well aware that it is very rare to hold an Examination in Public of a Structure Plan, but believe that one is necessary in the present unusual circumstances, since
- (a) the key concept of Strategic Development Areas has been slipped into the Finalised version of the Plan in a manner that circumvents thorough public consultation;
 - (b) at the meeting of Fife Council which approved the FFSP the members of the ruling group were conforming to a three-line whip rather than attempting to exercise independent judgement;
 - (c) the derivations of the housing land requirement and the housing shortfall are methodologically unsound and fail to comply with either SPP 3 : Planning for Housing or PAN 38 : Housing Land;
 - (d) we cannot recall a Structure Plan that has provoked such widespread and fundamental opposition across Fife and here in St Andrews in particular.

The use of GROS projections

5. Fife Council purports to build its justification for its Plan around the population and household projections produced by the General Register Office for Scotland (GROS), and treats these projections as though they were given by God, as inevitable as the changing of the seasons. The reality is that they should not even be viewed as forecasts. Had Fife Council read the small print, it would have appreciated that the statisticians who produced them were fully aware of the dangers of forecasting processes that are at the mercy of policy interventions. In the recent past these statisticians have explicitly indicated that, like Dickens' Ghost of Christmas Yet To Come, one role of their projections is to warn that persisting in current practices may lead to a decidedly unpleasant future.

6. The last few years have seen a major growth around Dunfermline in dormitory settlements for Edinburgh. This has been a major factor in the gross instability of the estimates of net migration into Fife, which have risen from 400 a year in the 2000-based projections, to 800 in 2002, to 1500 in the most recent 2004-based projections. (2005 RoS para. 5.243; RoS para. 3.262, where 2005 RoS denotes the Report of Survey for the Draft Plan). Extrapolated over 20 years, this latest estimate increases the population of Fife by 30,000. Whether this projection turns out to be more correct than the corresponding 2000-based projected increase of 7,500 depends largely on central and local government policy. There is nothing inevitable about either figure. The instability in the GROS projections indicates that their selected method of projection lays very substantial weight on the most recent observations – a practice which, as any statistician will tell you, means that you are more likely to be led up the garden path by short term blips. Again, however, it must be remembered that GROS is not attempting to forecast. Rather the projections are merely showing where continuation of the current short-sighted policies will lead.

The St Andrews Strategic Study

7. Following the public inquiry on the Local Plan in late 1994 and early 1995, Fife Region and then Fife Council devoted some considerable effort over several years to the St Andrews Strategic Study (StASS), which had been called for by the Scottish Office. This Study should have been treated as a material consideration in the future planning of this town. It was well-researched and made a genuine attempt to investigate the opportunities and the constraints on the future development of the town, and their interaction with the views of its citizens. When it was published in 1998, its conclusions were unequivocal. They included:-

- *Conclusion 2 **St Andrews is at its landscape capacity and no major expansion should take place.**
- *Conclusion 3 **Limited development to meet local need may be acceptable provided it is restricted to the selected pockets on the south west of the town.**
- *Conclusion 4 **Major new housing development would result in an unacceptable impact on the quality of the town's environment.**
- *Conclusion 5 **The landscape character of St Andrews is crucial to its character and must be protected and enhanced.**
- *Conclusion 6 **There is a need to contain the spread of the town**
- *Conclusion 7 **There is a shortage of affordable housing which is only likely to be provided in the amounts needed through a large housing expansion. This, according to the views of the community, is unlikely to be an acceptable price to pay.**

- *Conclusion 9 **St Andrews does not have the potential to support significant amounts of new industrial land.**
- *Conclusion 13 **The quality of the town's environment is under threat from traffic congestion.**
- *Conclusion 18 **Secondary school education facilities at Madras College are seriously overcrowded.**
- *Conclusion 20 **The community supports a new hospital for St Andrews, the preferred site being at the existing Memorial Hospital.**

8. Whilst policy in any sphere is subject to gradual evolution, it is possible to move from one stance to its exact opposite without total loss of credibility only if there has been some dramatic change in the underlying situation. In the present case, nothing has occurred in St Andrews to make a development boom any more realistic a possibility than it was in 1998. In fact, apart from small sites, more and more of the few remaining suitable housing sites have been used up. We have got ever closer to the point where further development will destroy the landscape setting of the town. Fife's transportation policies have failed to effect any significant move from use of the car to more environmentally friendly forms of transport, and, as the population has grown, congestion in the town centre becomes ever more frequent. The shortage of secondary schools in East Fife has not been addressed, and the position of Madras College is no better. In short, St Andrews is less able to sustain a development boom now than it was in 1998.

9. The FFSP is a complete volte face, not underpinned by the same careful research that characterised the Strategic Study. The authors of the FFSP are implicitly saying that their predecessors were completely misguided and that the very many hours spent in producing the StASS were a waste of public money. The reality is that it is the FFSP which is attempting to bend reality to fit a pre-chosen prescription. Ironically, StASS Conclusion 1 said that **"There is considerable further potential for involving the community in actively influencing the future of the town"**. The approach that has been taken over the last couple of years has increased that potential still further!

The Executive Summary

10. The FFSP declares (para 1.10) that its strategy "directs major new employment creating development to the main towns, particularly within Mid Fife, and to South Fife/Rosyth and St Andrews". In reality, with the possible exception of house-building, this FFSP does very little to direct new employment to St Andrews. It decrees the designation of an inappropriately large area of land in the town for employment purposes, but there is little reason to assume there would be any more success in using it than there has been at the various high-tech sites that have been designated and lain unused over the last twenty years. (See also paras. 18 and 31 below.)

11. Few phrases succeed in riling the population of the town more than the assertion (para 1.14) that "St Andrews will be further developed as a world class destination". It succeeds in embodying the whole notion of the town as a product to be marketed to benefit others. Locally the "world-class" priorities imply an inappropriate concentration of resources on the parts of the town that the tourists see, whilst allowing the upkeep of the rest to slip. Taking a wider perspective, the "world class" emphasis in tourism promotion is usually interpreted as trying to attract more rich American golfers, at a time when the world needs air travel to be reduced.

12. Shallow ideas do not gain any greater merit by endless repetition. We are told in para 1.8 of "the importance of St Andrews as a tourism destination of international renown", reminded in (para 1.14) that "St Andrews will be further developed as a world class destination" and again in para 1.16 that the strategy is to "To further develop St Andrews as a high quality tourist destination and to build on the tourism industry throughout Fife". Yet, as with other bits of dogma within the FFSP, the repetition does not yield any more substance.

13. This Community Council also has considerable reservations about some of the bland certainties of the National Planning Framework (paras 1.7 and 1.8) particularly as they pertain to St Andrews. The Framework again appears to reflect the views of those who see the town as primarily a resource to be exploited and those who lack detailed local knowledge. We note that central government did not see fit to consult local residents.

The Settlement Strategy

FFSP Para 2.1.

14. We object to the unqualified endorsement of continued growth in St Andrews. This is a casually formulated goal of desk-based theoreticians, who have not even acquainted themselves with earlier findings of their own Council as incorporated in the Strategic Study. Continued growth on the scale envisaged by the FFSP is clearly at odds with StASS Conclusion 2 which said that **“St Andrews is at its landscape capacity and no major expansion should take place”**.

FFSP Section 2.4, Para 1.

15. We object to the concept of the Strategic Development Area (SDA) as here defined. The SDA is a pivotal element of this FFSP, and it cannot be acceptable to make a last-minute addition of this magnitude. The notion of large-scale development on greenfield land is clearly at odds with StASS Conclusion 6 that **“There is a need to contain the spread of the town”** We show below that, if the housing land requirement is calculated in accordance with PAN 38, the minimum housing allocation for the St Andrews SDA greatly exceeds the housing shortfall for this Housing Market Area (HMA). The same would appear to be all the more true for Cupar.

FFSP Section 2.4, Para headed St Andrews.

16. As it stands, this paragraph conflicts with the first paragraph of this section. This is symptomatic of the hasty and ill-thought out way in which the SDA concept has been added to the FFSP. This paragraph says that **“Land for 1,200 houses . . . will be identified; a large proportion of which will be within a Strategic Development Area to the west of the town”**. This implies that the SDA will contain fewer than 1200 houses, conflicting with the first paragraph that said, **“These areas will be the focus for mixed use development containing a minimum of 1,200 houses”**.

17. Our objection to identifying land for 1200 houses is implicit in para. 15 above, but we would also object strongly to the location and the proposal for a new link road. After the crucial and highly sensitive southern hillside of St Andrews, the intended area to the west of the town is the next most important in environmental terms. A western link-road with associated development was one of the options canvassed during the Strategic Study, and the ensuing furore provoked the biggest public response that Fife Council had seen. As the Council at that time had more interest in public opinion, the idea was shelved. They concluded **“Major new housing development would result in an unacceptable impact on the quality of the town’s environment”** (StASS Conclusion 4). It was also recognised that **“Limited development to meet local need may be acceptable provided it is restricted to the selected pockets on the south west of the town”** (StASS Conclusion 3). This Community Council has argued consistently for over 15 years that the least environmentally damaging area in which to site the limited development that is required to meet local need is the relatively low-lying ground of the Kinness Valley to the south-west of the town.

18. We also object to the words **“A 10ha Science Park and a 10ha general business park will be identified to provide opportunities for employment growth”**. This overlooks StASS Conclusion 9 that **“St Andrews does not have the potential to support significant amounts of new industrial land”**. It also displays a depressing ignorance of the history of sites identified for such purposes in earlier Development Plans.

19. There are severe limits on the extent to which St Andrews can serve as **“an economic driver for the whole of Fife”**, and the FFSP does not have a coherent strategy to exploit even the opportunities that are there. If the tourist industry in St Andrews is to expand further, then an increasing proportion of tourists must arrive by public transport. Yet (see paras. 65 and 68 below) Fife Council sees reinstatement of the rail link as a minor local issue, which can be consigned indefinitely to the back-burner.

20. Another disturbing feature of the FFSP is the peripheral role of education, and the contribution that St Andrews can make in terms of academic development has not been thought through. The University has an international reputation, but its strength is its quality not its size, and the notion that spin-off ventures from university research will provide an economic driver for the whole of Fife is scarcely in touch with

reality. Overall provision of tertiary education in Fife is poor in terms of quantity. The major Scottish conurbations of Glasgow, Edinburgh, Aberdeen and Dundee all boast at least two universities. Fife, despite being the third largest Scottish Council in population terms, has just one.

21. The paragraph also fails to acknowledge adequately the extent to which the current success of St Andrews, for both tourism and education, is a function of the quality of its environment. The bottom line here, as throughout the FFSP, is that the unrealistic developmental goals have to be achieved regardless of their effect on the conservation of Fife's environment. The landscape capacity studies by Tyldsley and by Alison Grant have been brushed aside without a mention.

Implementing The Strategy

Policy SDA1 Strategic Development Areas

22. For all the reasons that we have set out above in the section on the Settlement Strategy, we object to this policy.

FFSP Para 3.6.

23. In the context of St Andrews, and probably elsewhere too, there is a disconcerting naivety about the assertion that "New development should not have a detrimental effect upon the communities of which they will be a part, or adjacent to. Rather it should contribute to the quality of the environment and to these communities". The notion that development on the proposed scale would improve the environment of St Andrews is ridiculous. In the days of more objective assessment it was recognised that "**St Andrews is at its landscape capacity**" (StASS Conclusion 2) and that "**The quality of the town's environment is under threat from traffic congestion**" (StASS Conclusion 13). The authors of the FFSP again fail to apply the principles that they purport to believe. They say (para. 3.61) that "it is also important to guide development away from locations where the traffic generated by the development may adversely impact on local communities." There is, however, no evidence that they have given a moment's thought to the effect that the traffic from more than 1200 houses would have on the town centre of St Andrews, which is already frequently subject to grid-lock over the summer months.

24. We draw no consolation from the vague assurance (FFSP Para 3.6.) that "the development industry will be expected to make an appropriate contribution" to strategic infrastructure for strategic development sites. The huge expansion proposed would impact adversely on the whole range of public services. A small number of developer contributions would not start to repair the damage, even if the Council managed to secure them. There has been a failure to foresee all the implications of the Plan, never mind make proper provision for them.

Policy DC1: Developer Requirements - Essential Community Infrastructure

25. No doubt the approach to planning that this policy embodies looks highly attractive to central government, being based on the philosophy of something-for-nothing. Five years ago we, as a Community Council used to point out cases where the Council had failed to extract some legitimate planning gain from a developer. Since then the pendulum has swung so far in the opposite direction that it is bringing the whole planning system into disrepute. In recent years, all too frequently it appears that Fife Council's primary considerations in processing major planning applications have not been their acceptability in planning and transportation terms, but rather the question of what public works could be demanded from the developer in return for consent. The Council has become less an objective judge and more an interested party. The FFSP incorporates the same something-for-nothing philosophy writ large. The result will again be that the Council's judgement will be seriously influenced by its own financial considerations. Our own experience suggests that it will not be members of the public, or even the local Council members, that decide whether or not it is a getting a reasonable deal, but Council officials pursuing their own agenda.

Proposal DC1: Developer Requirements – Strategic Land Allocations

26. This table includes a weak requirement for developers to contribute towards secondary schools in St Andrews and at the Tay Bridgehead, leaving even vaguer the time-scale for any action. In the case of

Madras College, it is not reasonable to over-develop the town to provide the funding that the Council should have found years ago.

27. This table of largely ill-defined projects also illustrates well how this approach to planning transfers power to the hands of unelected Council officials. Many of the items on this list can mean whatever the officials choose them to mean. For instance, members of the public reading this list may well have been deceived into imagining that, in the St Andrews context, “Strategic transport network improvements” meant the obvious rational step of reinstatement of the rail link. Those of us more familiar with the negative attitude of Fife Council in this regard would be much less optimistic.

Policy C1: Strategic Infrastructure

28. The bullet point on healthcare facilities effectively says that “Fife Council will seek to ensure that proposals for new or expanded or augmented healthcare facilities will be supported where they are in sustainable locations, supported by public transport”. Such facilities should not be supported if they do not conform to other Development Plan policies, so a better wording would be “Fife Council will seek to ensure that proposals for new or expanded or augmented healthcare facilities are in sustainable locations, supported by public transport”.

29. The final clause effectively reads “Fife Council will seek to ensure that Local Plans will provide positively for the provision and upgrade of ICT infrastructure and support the expansion of networks across Fife”. This approach would represent a continuation of the manner in which mobile phone and TETRA technology has been introduced in the UK. Public concerns about the unknown health risks of this technology have been brushed aside by government and people have had to live with these technologies whether they like it or not. Although people’s views still differ widely, a large fraction of the population would now, for instance, deem it unwise to site a mobile phone mast or TETRA mast alongside a primary school or a hospital, or close to residential accommodation if it can be avoided. Accordingly the FFSP should require Local Plans to provide guidance on the siting of such phone masts. As ever, the authors of the FFSP have a narrow focus on facilitating economic development: many of the people of Fife believe their quality of life is also affected by environmental and health issues.

FFSP Para 3.25.

30. The academics of the University of St Andrews already have extensive “links outwith Fife”, and so the opening sentence of this paragraph again fails to convince the reader that any dramatic change in the rate at which major spin-offs are achieved (see para. 31 below) is imminent. More is needed than the “Science Park” label or excessive land allocations. For general business use the emphasis should be on retention of the site at Bassaguard and the refusal of consent for housing on existing business sites within the town, something Fife Council has often failed to do.

Policy E1: New Employment Land

Proposal PE1: Proposed and Existing Strategic Employment Land

31. We object to this policy and proposal in so far as they apply to St Andrews. The proposal for 10 hectares of land in St Andrews for a Science Park and a further 10 hectares for business use is either a triumph of hope over experience or else was written by someone who had no familiarity with the planning history of the town. We are happy to encourage spin-off ventures from university research, but this is not a new idea. Enthusiastic attempts were made long before the jargon phrase “knowledge economy” was born, but the difficulties of such exercises in the St Andrews context are evident from the limited success that has been enjoyed to date. A substantial supporting case is needed to justify a land allocation on even a quarter of this scale. Areas brought within the town envelope for this purpose are likely to end up being developed for other purposes. This is not a satisfactory way to proceed.

Housing

Calculation of the Housing Land Requirement

The role of household projections

32. Fife Council's approach to the GROS household projections is based on a fundamental misunderstanding of the role of such projections. Fife has failed to heed the warnings that **"It is important to realise that projections are not forecasts"** and that **"Their purpose is to give an indication of possible future numbers of households if trends observed in past censuses continue"** (Household Projections for Scotland, 2000-Based, Annex A - Full description of methodology

- <http://www.gro-scotland.gov.uk/statistics/library/household-estimates-projections/>).

Fife Council appears to have overlooked also the corresponding note of caution in PAN 38, para. 16 covering both population projections and trends in household formation. This reads, "While these provide planning authorities with a useful starting point in assessing the likely scale of future requirements, it must be recognised that they are projections based on past trends rather than predictive forecasts". GROS also explain that "It should be recognised that household projections, like other projections, may indicate that existing trends and policies are likely to lead to situations which are judged undesirable. If new policies are then introduced they may result in the original projections not being realised. However, this means the projections will have fulfilled one of their prime functions; to show the consequences of present trends with sufficient notice for any necessary action to be taken." (Ibid, Annex B - Uses, limitations and consequences of projections)

33. Viewed from any broader perspective, these warnings are highly pertinent. Population and household projections for Fife cannot be considered in isolation from those for the rest of the country. To allow past trends to persist does indeed lead to what GROS calls "situations which are judged undesirable" particularly from the stance of Dundee. The 2004-based projections show Fife's population rising by 32,000 in the 20 years to 2024, but Dundee's population falling by 21,000 to just 121,000 with consequent effects on the Council-tax base. For many years significant numbers of those retiring in the West of Scotland have sought new homes in St Andrews. Such transitions will do nothing to ameliorate GROS projection that the population of Glasgow will fall by 25,000 by 2024 – arguably another of GROS's situations which should be "judged unacceptable".

The planning horizon

34. Only an elementary understanding of statistics is needed to realise that the uncertainties of forecasting increase greatly as the lead time increases. This point was clearly appreciated by those who wrote in SPP 3, para 61, **"The structure plan should identify the overall housing land requirement for a period of 12 years from the plan's expected date of approval"**. The same unequivocal wording is repeated in PAN 38, para. 10. Attempts to predict the future beyond the 12 year horizon become increasingly foolhardy the longer the lead time becomes. So whilst para. 61 of SPP 3 and para. 10 of PAN 38 do also require that a structure plan should "provide a broad indication of the scale of the housing land requirement and the location of housing development beyond year 12, preferably up to year 20", this is qualified in para. 15 of PAN 38 by the wise caveat **"Beyond year 12, the emphasis should be on giving a broad indication of the scale of the requirement rather than firm figures"**. Para. 61 of SPP 3 also requires the housing shortfall for the first 12 years to be split into two phases. In contrast the FFSP provides four phases of land allocation over a 20 year period, but only for SDAs (Proposal H2).

35. The procedure that Fife Council has followed is in fact specifically condemned in para. 9 of PAN 38. This notes that *"SPP 3: Planning for Housing* indicates that structure plans should where possible provide guidance on the scale and distribution of housing land provision over 20 years". It goes on, however, to declare unequivocally that **"housing land requirements cannot be determined with precision for such an extended period"**. Rather than indulging in spurious precision, this paragraph anticipates that "authorities should be able to indicate clearly how the settlement pattern is expected to develop over the longer term". As is demonstrated by the string of quotations in this paragraph and the preceding one, the advice on the forecasting horizon is not a single casual aside in a single document, but the consistent repeated message in the two key publications. Faced by this barrage of advice, it is astonishing that Fife's planners have nonetheless attempted to make a precise determination of the housing land requirement over a full 20 years.

In contrast, we note that in the current revision of the Edinburgh and the Lothians Structure Plan (ELSP), which has to be in place by 2008, the housing land requirement is projected to 2020, thereby adhering to the recommended 12 year horizon.

Additional migration

36. In the 2005 Draft Structure Plan, Fife Council distinguished between “household formation brought about by natural change in Fife” and an “additional (net inward) migration” of a projected 8000 new households arising at the rate of 400 households a year over a 20 year period. Of these 8000 new households, Fife said “In disaggregating this figure below Fife level, it is calculated that the majority - 5,000, will locate in Dunfermline & West Fife, 2,000 in Kirkcaldy and Mid Fife and 1,000 in St Andrews and East Fife” (2005 RoS para. 5.249). A more precise disaggregation was given in the 2005 RoS, Fig. 5.47. In the FFSP, by subsuming the additional migration within the overall total, Fife Council has effectively chosen to carry out this disaggregation on a pro-rata basis relative to the present populations of the HMAs. No justification is offered for this dramatic change.

37. As “additional migration” forms one component of the GROS projection, which is merely an extrapolation of present realities, the logical approach must surely be to perform the disaggregation according to the HMAs into which the current inward migrants move. The total populations of each HMA give a very poor indication of this: a somewhat better one is given by RoS Table 3.27 which shows the completion rates in each HMA over the period 2000-05. The resulting totals for each HMA over this period are shown in Table 1, together with the corresponding percentages. These percentages have then been used to disaggregate the 4800 households that result from a net inward migration of 400 households a year over a 12 year period. Apart from Cupar where the difference is small, this approach gives figures that lie between the two more extreme methods used by Fife Council.

Table 1 : Additional migration

HMA	Completions 2000-2005	Percentage of total completions	Additional migration
Dunfermline 1	3565	45.7	2192
Dunfermline 2	441	5.6	271
Kirkcaldy	2471	31.7	1520
Cupar	379	4.9	233
St Andrews	950	12.2	584
Total	7806	100	4800

Household change between 2006 and 2018

38. GROS’s 2004-based projections show the number of households in Fife rising from 157,660 in 2006 to 177,770 in 2018. This increase of 20,110 is based on an assumption of net inward migration of 1500 people or 750 households a year. As indicated above, we do not see it as appropriate to concede a policy failure of this magnitude, and propose that the 2002-based estimate of 400 households a year should be used. This implies that, over the 12 year period, 4,200 fewer households would migrate to Fife than in the GROS projection, giving an increase of 15,910 households.

Disaggregation of household change between HMAs

39. To disaggregate this total of 15,910 households between the HMAs we have followed the approach adopted by Fife Council in its 2005 RoS, which, as we have argued above, is methodologically superior to the current approach. The disaggregation of the 4800 households resulting from inward migration is as in Table 1. The remaining 11,110 households have been divided between the HMAs in proportion to their current populations (Ros Table 3.22), in the manner that Fife has this year used for the complete disaggregation.

Table 2 : Disaggregation of household change between HMAs

HMA	Percentage of population	Household change excluding migration	Additional migration	Total household change
Dunfermline 1	28.3	3144	2192	5336
Dunfermline 2	9.1	1011	271	1282
Kirkcaldy	41.0	4555	1520	6075
Cupar	7.8	867	233	1100
St Andrews	13.8	1533	584	2117
Total	100.0	11110	4800	15910

Housing Need

40. Table 3 is our proposed revision of Fife Council's RoS Table 3.24. The total household changes derived in Table 2 are augmented as a result of demolitions, vacancies and flexibility. These components are discussed in the paragraphs below the table. The reduction of the planning horizon to 12 years accounts for the greater part of the differences between Table 3 and Fife's RoS Table 3.24.

Table 3 : Housing Need 2006-2018

HMA	Total household change	Demolitions	Vacancies	Total need	8% flexibility	Housing requirement
Dunfermline 1	5336	260	160	5756	460	6216
Dunfermline 2	1282	100	38	1420	114	1534
Kirkcaldy	6075	400	182	6657	533	7190
Cupar	1100	20	22	1142	91	1233
St Andrews	2117	20	42	2179	174	2353
Total	15910	800	444	17154	1372	18526

Demolitions

41. The statement that "Most demolitions are expected to occur early in the plan period" (RoS para. 3.266) suggests that it is appropriate to leave unchanged the demolitions from RoS Table 3.24, despite the reduction from 20 to 12 years in the planning horizon.

Vacancies

42. The 2005 RoS explained (Para 5.251) that the demolition programme reflected, not surprisingly, the "clearance of hard-to-let stock". It could indeed be argued that the demolition programme would be expected to produce some overall reduction across Fife in the vacancy rate at the time of the 2001 Census. Despite this, in Table 3 we have retained a 3% vacancy allowance for the Dunfermline and Kirkcaldy HMAs. For the period 2007-09, however, Fig. 5.48 of the 2005 RoS showed that no demolitions were planned for the St Andrews and Cupar HMAs, so it has to be presumed that there are fewer hard-to-let properties in these areas. The application of a uniform vacancy rate across Fife would therefore appear unjustified, and thus in Table 3 we have applied a 2% vacancy allowance to the St Andrews and Cupar HMAs.

Flexibility

43. FFSP Para 3.44 says that an additional allocation of 8% has been added to the overall requirement to allow for flexibility. This conflicts with FFSP Fig 3.1 which indicates that the flexibility accounts for 8% of the *total* housing land requirement. RoS Para. 3.271 again states that "an additional 8% has been added" and makes comparison with the Lothians Structure Plan and earlier Fife plans. It is in fact evident from RoS Table 3.24 that a flexibility allowance of 10% has been added; thus the description of this as an addition of 8% is simply an elementary error on the nature of percentages. In Table 3 we have applied the 8% addition that was apparently desired.

“Population Growth - Housing Requirement”

44. In Table 3.26 the RoS increases the housing requirement of 29225 units calculated in Table 3.24 by almost 6000 units. The only justification given for this appears in para. 3.272, which indicates that “the Structure Plan is promoting growth beyond the 2002 Based Population Projections, to start taking account of the 2004 population projections.”

45. At first sight, it might then be thought that we should be proposing a corresponding increase 3,600 units to allow for our projection being over 12 years rather than 20 years. The logic of our above arguments, however, implies opposition to this increment in its entirety. Adjusting to the net migration rates under the 2004-based projections means damaging the interests of neighbouring authorities and promoting rather than reducing global warming. We therefore do not revise RoS Table 3.26, but propose that the housing land requirements should be as specified in our Table 3.

Summary

46. We object to the proposed housing land requirement specified in Policy H1 and Proposal PH1. To accord with PAN 38 the requirement should only be specified with precision until 2018. We believe the number of units required should be revised as shown in Table 3 above.

Calculation of the Housing Shortfall

Urban Capacity Supply

47. RoS para. 3.291 indicates that only 70% of the urban capacity supply has been included. We have adopted the same percentage, although, contrary to the text of that paragraph, we would have thought the longer time period made it more likely that these sites would be developed. RoS Table 3.31 indicates an urban capacity supply over the period 2006 - 2016 of 1077 and 36 units for the Dumfermline 1 and Dumfermline 2 HMAs respectively. For the Kirkcaldy HMA the corresponding supply is 1426 to 2016, and we will assume that one-fifth (i.e 61 units) of the post-2016 supply is applicable to the period 2016 - 2018. In view of Fife’s concerns about double-counting of windfall sites we have conservatively omitted the urban capacity supplies for Cupar and St Andrews.

Windfall Sites

48. The contribution from windfall sites is discussed in RoS Para 3.293 and the assertion is made that “the current trend is downwards”. This appears to have little statistical validity in the context of a Structure Plan with a 12 year horizon, still less a 20 year one. Whilst there has manifestly been a decrease over the years 2000-03, the data over the five years in RoS Fig. 3.26 exhibit no statistically significant trend. We also note that the information provided is now three years out-of-date and simply matches that in the Draft Structure Plan published a year ago. Questions should be asked about why no updating has been carried out.

49. Having no experience of windfall site rates in the Dunfermline and Kirkcaldy HMAs, for a 12 year period we have simply included 60% of the windfall figures for these HMAs given in RoS Table 3.32 (the sub-division for Dunfermline is given in 2005 RoS Fig. 5.58). Our experience of East Fife, however, suggests that it makes no sense to take the contribution from windfall sites to be less than 40% of the recently observed level. If Local Plans are kept more up to date than has happened in recent years, some reduction in this contribution might be anticipated, but judging by the approach that Fife Council takes to applications for sites outwith the Local Plan, it is implausible that this reduction will be other than small. Use of the yearly Fife-wide average of 431 units (based on the period 1998-2003) would imply a contribution of 5172 units from windfall sites over a 12 year period, and RoS Table 3.32 suggests that the Cupar and St Andrews HMAs account for 1/16 and 1/8 respectively of the total, implying 323 and 647 units respectively. As a conservative projection, we propose taking 80% of these totals. Para. 5.265 of the 2005 RoS indicates that the aim of the calculation is to produce an “estimated output” from windfall sites, and this approach would appear likely to give a far closer approximation. By omitting urban capacity supplies for these HMAs we have removed any possibility of that overlap.

Small sites

50. We would agree with RoS para 3.296 that, of approved applications, “the vast majority will result in development”, and therefore regard an assumed 80% completion rate as the minimum that could be realistic. Much less pertinent, however, is the expectation, in the same paragraph, that “over the next 20 years scope for further farm conversions and infill development will diminish.” As a Community Council we have often deplored the willingness of Fife Council to grant consent for infill development, but, whilst the loss of open space between buildings is regrettable, not even we would argue that it would start to become physically impossible in the next 20 years. Two further points should be noted. Firstly there appears to be an increasing belief on the part of developers that phasing developments in batches of four dwellings so that they count as small sites is an effective way to gain planning consent. Secondly, if as we have argued, this Structure Plan should be producing firm figures only for a 12 year period rather than a 20 year one, the plausibility of a major diminution of the present rate appears still further reduced. The assumption of just 30 units and 20 units per annum for the St Andrews and Cupar HMAs respectively thus looks completely unrealistic.

51. As with windfall sites, the goal should be to produce realistic estimates for the two HMAs for which a small sites contribution is appropriate. We see the proposed 80% completion rate as already being a conservative assumption and see no case for a further reduction in the estimate below that level. Accordingly an assumption of 120 units on small sites over a 12 year period implies a total of 1440 units. Dividing this between the St Andrews and Cupar HMAs in the 3:2 ratio employed by Fife Council yields contributions of 864 and 576 units respectively.

52. Taking the Contributing Supply from RoS Table 3.33, the effects of the changes that we propose on the calculation of the housing shortfall are shown in the following table:-

Table 4 : Calculation of the Housing Shortfall

	Housing requirement	Contributing Supply	Urban capacity supply	Windfall	Small sites	Shortfall
Dunfermline 1	6216	1958	1077	600	0	2581
Dunfermline 2	1534	1311	36	120	0	67
Kirkcaldy	7190	3106	1487	840	0	1757
Cupar	1233	185	0	258	576	214
St Andrews	2353	138	0	518	864	833
Total	18526	6698	2600	2336	1440	5452

Summary

53. **We object to the shortfall figures specified in Proposal PH1, and propose that they should be revised as shown in Table 4 above. We object also to the Strategic Land Allocations in Proposal PH2.**

Policy H2: Meeting the Housing Land Requirement

54. We wish to see this policy strengthened significantly. The requirement that Local Plans will “provide for a range of sites, tenures and house types” is much too vague and weak to tackle the major housing problems of St Andrews. It cannot be assumed that appropriate housing types will naturally emerge as a result of market economics. For housing sites in St Andrews, private developers typically seek consent for developments in which four and five bedroom properties are the norm. A large proportion of these are sold over many months to those from outwith the town, until, after about three years, a more realistic assessment is made of the market and the developer reapplies for rather smaller properties on whatever fraction of the site is still undeveloped. It cannot make the slightest sense to generate housing projections on the basis of households of size two, as this Structure Plan does, and then give consent to housing sites full of four and five bedroom properties.

55. We will only see progress in this regard if Policy H2 requires Local Plans to disaggregate the housing land requirement for each HMA by both tenure and house size. If there is any substance at all in the

housing projections in the Plan, there is also an implied distribution of house types. To simply come up with a grand total and then allow developers to build whatever they (often mistakenly) believe will generate the largest and quickest profits is an abdication of responsibility. If we need, for instance, 200 affordable two-person homes in St Andrews but do not have finance currently available, what good is achieved by permitting a developer to erect 200 luxury ones instead? The result is simply to waste the scarce housing land still available and to intensify the future conflict between the need for housing and the need to conserve the environment. From any logical perspective, this is the housing policy of the mad-house, yet it is what has been happening for years, and the FFSP offers little prospect for change.

56. The corresponding policy in the 2002 Structure Plan opened with the words “Local Plans, rather than planning applications, will be the preferred means of identifying sites for development”. We can see no argument for weakening it by omission of the subsidiary clause.

Policy H4 : Provision of Affordable Housing

57. The Community Council does not believe that this policy is adequate to meet the exceptional circumstances that pertain in St Andrews. Para 3.54 says, “It is important that affordable housing should remain available to meet the future needs of local people”, but the FFSP does not appear to provide any substantive mechanism to ensure this. We would expect to see a continuation of past practice, where affordable housing remains affordable for at most 10 or 15 years, and frequently much less than that. Such developments give the deceptive appearance of progress while the reality of the situation gets worse. St Andrews does not have housing land to squander in this way. Our reaction to developer-funded affordable housing is moulded by this shortage of suitable housing land. Under Fife Council’s proposal of 30% affordable housing in the St Andrews HMA, we end up getting seven houses for which we have little need for every three houses of the type that is sought. In terms of the dilemma identified in StASS Conclusion 7, this implication of the developer-funded approach “is unlikely to be an acceptable price to pay”. In such circumstances, it is preferable for the land to remain undeveloped until a better funding mechanism can be secured. If, despite our arguments, the Scottish Executive continues to believe developer-funded affordable housing can contribute, we would wish to see included in Policy H4 the stipulation that the affordable component should be completed within a similar timescale to the non-affordable.

58. In seeking above the disaggregation of the housing land requirement by type and tenure, we recognise that the most important categories for St Andrews needs are those types of affordable housing that remain affordable in perpetuity, including rented accommodation from housing associations and housing cooperatives. We wish to see sites earmarked exclusively for this purpose, and indeed believe that the housing needs of St Andrews will only be met when the greater part of the housing land allocation is so designated.

Transportation

Policy T1: Transport and Development.

59. The version of this policy in the 2002 Fife Structure Plan included a number of useful extra clauses. We object to the omission of the clauses saying that development proposals must:-

- provide adequate cycle facilities where appropriate;
- not exacerbate a recorded air pollution problem
- not create or exacerbate a road safety problem; and
- not prejudice identified ‘Safer Routes to School’.

FFSP Para 3.62.

60. We object to the inclusion of the words “Over the Plan period this will include a range of strategic improvements, including the potential requirement for a replacement or an additional multi-modal crossing at Queensferry. The strategic development strategy will support the case for a crossing. The principle of a further multi-modal crossing is considered vitally important in the context of growing the national economy and those of Edinburgh and Fife. It is important for Fife’s economic and social inclusion agendas to achieve a further crossing.”

61. As indicated above, we see the proposal for a new Forth crossing as contrary to the “broad consensus that land use planning policies should seek to minimise the need for travel” (Royal Commission on Environmental Pollution, 1994). No case has been made that it is vital for the economy of Edinburgh and Fife: it is obvious that it will not assist efforts to reduce global warming.

Policy T2: Safeguarding of Existing and Potential Transport Routes

62. Structure Plans should not be written on a “we know what we mean by it” basis, and the notion of “St Andrews public transport route” must surely fall into this ill-defined category. We object to this vague wording. We propose that it be replaced by “**land for a rail link, following an alignment on the southern side of the A91, from the East Coast Main Line to a new station in St Andrews, located at or very close to the former station site.**” To maximise the contribution that the rail link can make, it is important that the track reaches a position close to the centre of St Andrews. Development pressures near St Andrews are such that a failure to act at this time is likely to render this impossible. Consideration should also be given to safeguarding land for car and taxi parking near a new St Andrews station. A masterplan is required for the eastern end of the North Haugh, determining where new University buildings would be acceptable and what land is required for transportation purposes. (This should be a key component of the essentially undefined Campus Plan of para. 1.20 of the FFSP.) At the point where the rail link joins the East Coast Main Line, land for both southern and northern chords is required.

63. We certainly do not object to the safeguarding of the Kingdom of Fife cycle route, but recognise that this route is only a small first step in encouraging more people to cycle. Bearing in mind that much of the route consists of minor roads, carrying vehicular traffic moving at 60 mph or more, it is definitely not a safe environment for children or inexperienced cyclists. We wish to see an additional sentence added to this policy requiring Local Plans to identify and safeguard a connected network of off-road routes which can be developed when finance permits.

64. For the reasons given above we object to the inclusion of the words “landfall for approach infrastructure for a potential new multi-modal crossing of the Forth”.

Proposal PT1: Transport Proposals

65. **We object to the clause in this proposal which reads “further consideration of transport link options for St Andrews to the rail network will be addressed through the review of the Local Transport Strategy”.** This Community Council has long argued for the reinstatement of the rail link to St Andrews and we are appalled at the feebleness of this proposal. In particular, the need to safeguard the route of the rail link in the 2002 Structure Plan formed one of our objections to the previous FFSP. The subsequent revision fell short of what we would have liked. The 2002 Structure Plan (para. 2.2.5) said “The Local Transport Strategy identifies the need to review the requirement for new stations at Leven and St Andrews (including a new rail link)”. Proposal PT2 of the same Plan read “Land for the following routes and facilities will be safeguarded from prejudicial development and identified in Local Plans, in accordance with the Local Transport Strategy”, and the list thereunder included “The Leven and St Andrews lines including new stations (subject to review through Local Transport Strategy)”. Even this rather grudging wording is better than the latest, rather garbled, proposal which amounts to a fairly frank declaration that Fife Council would like to put the issue on the back burner for the next twenty years.

66. In contrast, this Structure Plan should be providing a vision for the future of better and more sustainable transport for those who live and work in St Andrews, and providing a means for more tourists, golfers and academic visitors to access the town more easily without causing continual gridlock on our roads. We believe that, as well as bringing major benefits to St Andrews, it would pay dividends to Cupar and other parts of East Fife. We envisage that likely customer numbers for such a link are significantly higher than has been suggested. The Tay Estuary Study, for instance, was focussed on traffic to and from Dundee.

67. A more far-sighted Council would have built the Structure Plan proposals for St Andrews around the target of reinstating the rail link. It offers a way for tourism to expand without suffocating the town.

Moreover, although the need to conserve the landscape setting of St Andrews means, as we have noted above, that little suitable housing land now remains in St Andrews, an increasing number of university staff and others employed in St Andrews need housing within easy reach of the town. The rail link offers a real prospect of squaring this circle. The methodology advanced by Prof. George Hazel of E-Rail Ltd in the context of the Edinburgh South Suburban scheme and elsewhere, has shown how rail projects can be made viable by linkage to associated development. Clearly in the St Andrews setting restrictions on the location and nature of associated developments would be needed, but the characteristic desperation of developers to acquire sites near St Andrews mean that the methodology should be more readily applied here than in many other places.

68. For these reasons, we seek the insertion under the National/International heading of the words:- **“reinstatement of a rail link from the East Coast Main Line to St Andrews”**. The tourism industry in St Andrews is of national importance and University of St Andrews is of international importance, and so provision of environmentally friendly transport to the town must surely merit inclusion under this heading.

69. For the reasons given above we object to the inclusion of the words “new multi-modal cross-Forth bridge and associated approach networks at Queensferry – initial feasibility study with potential for a new bridge”.

Environment

Landscape Setting

FFSP Para 4.3.

70. This paragraph attempts to re-write history by implying that in the 2002 Structure Plan the sole aim of the Green Belt for St Andrews was “To ensure that critical views to and from historic cores are protected”. The reality is that para 2.1.14 said, “To maintain existing landscape settings (including critical views to and from historic cores), to plan for all forms of growth in this context and prevent coalescence and to strictly control any intrusive countryside, recreational or institutional developments, Green Belts will be established around St Andrews and to the West and South West of Dunfermline in accord with Government Policy set out in SDD Circular 24/1985.”

FFSP Para 4.4.

71. We object to, and seek the removal of, the words “to direct planned growth to locations not in the Green Belt”, which are clearly intended to ensure that the inner boundaries of the Belts are very slack. The same idea is repeated, and better expressed later in the paragraph in the words “The Local Plans will define the boundaries to accommodate growth of the towns”. We also seek the removal of the words “and allow for suitable and appropriate development, including golf courses, within the Green Belt.” St Andrews does not need any more golf courses in the Green Belt, and certainly no more clubhouses there.

FFSP Para 4.5.

72. We propose that this should be re-written to say “As was recognised in the 1998 Strategic Study of the town, St Andrews is at its landscape capacity, and the Green Belt should therefore encircle the town. The key issue is how to accommodate affordable housing to meet local needs, and a limited area of employment land, without destroying the landscape setting of the town. The Local Plan will identify robust Green Belt boundaries to satisfy these objectives, taking full account of all available landscape assessment work on the area.” The present wording introduces a gross inconsistency into the Plan and is a distortion of the truth. If the FFSP were to be approved in its current form, the Local Plan will be unable to “set out . . . the extent to which St Andrews should grow over the next 20 years”. The Local Plan will have to implement the huge expansion set out in the FFSP – an expansion which will inevitably destroy the landscape setting of the town, and mean that a primary goal of the Green Belt is unattainable.

Policy ENV1 : Landscape Setting of St Andrews and Dunfermline

73. We object to the weakening of the Green Belt policy compared to that in the 2002 Structure Plan. We also wish to see a minimal set of exemptions from the presumption against development. We propose the following amended version of Policy ENV1:-

Green Belts will be identified to the West and South-West of Dunfermline and on all the landward sides of St Andrews to limit urban expansion, to control long-term growth and to preserve the

landscape setting and character of these towns, conserving in particular the existing views to and from their historic cores. There is a presumption against any development or change of use in the Green Belts unless it for the purposes of agriculture, horticulture, or forestry. Local Plans will identify Green Belt boundaries. Development proposals likely to prejudice this process will be considered premature.

FFSP Para 4.7.

74. We seek the removal of the words “Define appropriate forms of development within the Green Belt” and “Provide a landscape structure for areas where development is appropriate” The tighter formulation of Policy ENV1 that we seek means that the first of these clauses becomes redundant. The second clause is already at variance with Policy ENV1 as that policy concedes that some uses may be acceptable rather than some areas being appropriate for development.

The Coast

75. This Community Council objects to the omission of policies for protecting the coastal environment. Environmental protection policies were present in the 2002 Fife Structure Plan, and we are unconvinced by arguments from Fife Council that such policies can be left to Local Plans. It appears obvious to us that the main thrust of the FFSP is to facilitate development wherever possible, and that environmental postures such as (para. 4.24) “Safeguarding and improving the character and distinctiveness of Fife’s landscapes and coastline” are deliberately intended to be as toothless as possible. We seek a formulation at least as strong as that in the adopted ELSP, namely **“Local plans should define the detailed boundaries of the developed and undeveloped coast. Development on the developed coast will be supported where it demonstrates a need for a coastal location, or contributes to the renewal and regeneration of an area. Development on the undeveloped coast will only be permitted where it demonstrates a need for a coastal location, that the benefits outweigh any detrimental environmental impact and that there is no alternative site”**.

76. The definition of coastal areas in this formulation appears particularly valuable as the application of existing policies in Fife has been so inconsistent as to be close to farce. The coastal protection policies were applied to the relatively unobtrusive “Hungry Horse” site, well back from the Eden Estuary, but not to the Kingask site above the cliffs at Kinkell Braes.

Built Heritage

77. This Community Council wishes to see the retention of policies to protect the built environment. We find it disappointing that, unlike the 2002 Plan, Conservation areas are not even defined in the glossary of the new Structure Plan, and the section on the built environment now has no accompanying policies. We propose the following formulation, based on an ELSP policy:-

Development which would harm the character, appearance and setting of the following designated built or cultural heritage sites, and/or the specific features which justify their designation, should be resisted.

- Conservation Areas
- Listed Buildings
- Scheduled Ancient Monuments

Local plans should include policies, and where appropriate proposals for their protection and enhancement.

Sports grounds

78. We wish to see the retention of Policy C3 of the 2002 Fife Structure Plan, which protected sport and recreation facilities.

Archaeological Protection

79. We wish to see the retention of Policy B3 of the 2002 Fife Structure Plan.

Flooding and Coastal Erosion

80. We wish to see the retention of Policy C1 of the 2002 Fife Structure Plan, which restricted development in areas of known flooding risk. We regard the one line in the new Policy SS1 as inadequate.

Yours faithfully,

Ian Goudie
Vice-Chair.

Appendix : Summary of non-standard abbreviations

ELSP : Edinburgh and the Lothians Structure Plan 2015 (Approved June 2004).

FFSP : Finalised Fife Structure Plan, 2006.

RoS : Report of Survey for the FFSP

2005 RoS : Report of Survey for the Draft Fife Structure Plan

SDA : Strategic Development Area

StASS : St Andrews Strategic Study, 1998