



# Royal Burgh of St. Andrews Community Council

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6 November 2007

Dear Sir/Madam,

## **The Finalised Fife Structure Plan 2006-26 Housing Land Requirement Reappraisal**

### **Overview**

1. I write on behalf of the Community Council to object to the Housing Land Requirement Reappraisal (HLRR07). I apologise for the lateness of this submission, but assume that it is still appropriate at this stage to write to Fife Council rather than directly to the Scottish Ministers. We wish to reiterate our major concern that Fife Council still appears to be ignoring the guidance in PAN38 and SPP3 that precise prediction of the housing land requirement should only be attempted up to a 12 year horizon rather than a 20 year one. HLRR07 has also provoked a range of new concerns. We believe that the methodology used in the Technical Background Report (TBR07) significantly overestimates the housing land requirement, and fail to see how the calculation of the housing shortfall can be numerically correct. We would indeed doubt whether Fife Council should submit HLRR07 to the Scottish Ministers without substantial revision.

### **Effects outside Fife**

2. It is clear that HLRR07 does nothing to address many of our more fundamental objections to the Finalised Fife Structure Plan (FFSP06). In view of the instability of governmental population projections, based as they are on very short-term trends, we have little faith in last week's news stories of booming population sizes and will not be surprised if the next revision is downwards. As we asserted in our submission last year (CC06 para. 33), it remains highly probable that the growth rates envisaged by Fife can only be achieved by poaching population from Dundee, from Glasgow and from elsewhere in Scotland.

### **Environmental damage**

3. It should be remembered that the 2004-based projection by the General Register Office for Scotland (GROS) of 9% population growth in Fife over 20 years is not some spontaneous fortuitous occurrence. It is a child of the rapid expansionist policy that Fife has pursued in recent years, and the encouragement it has given to long-distance commuting into Edinburgh, regardless of the consequences in terms of global warming. Yet, in their major strategic planning, Fife's officials have still not taken on board the principle of guiding development to locations which will reduce the need to travel by private car. The vision for 2026 in the Consultative Statement (CS07) clings unabashed to the role of Fife in providing dormitory settlements for cross-Forth commuters. There is therefore a need for a thorough investigation of the likely environmental consequences of the proposed reappraised Fife Structure Plan, paying particular attention to its effect on national attempts to reduce carbon emissions.

### **No quantification of the environmental damage**

4. As it is, the Strategic Environmental Assessment (SEA) sets itself a very narrow remit and makes no attempt to quantify the environmental damage that the reappraised Structure Plan would cause. Instead it offers merely a long list of bland reassurances. It acknowledges that the 9% growth option “has the potential . . . to increase outcommuting to Edinburgh, with consequential environmental problems arising from increased traffic and congestion”, but makes no serious examination of the extent to which the same is true of the 5% growth options. Despite the conclusions of the 1998 St Andrews Strategic Study (StASS) that “Major new housing development would result in an unacceptable impact on the quality of the town’s environment” and that “The quality of the town’s environment is under threat from traffic congestion”, there is no detailed examination of the impact of the Plan upon the town.

### **Narrowness of the vision**

5. It has been stated that HLRR07 is only intended to address the housing shortfall aspect of FFSP06. Yet it manages to find space to indulge the fixation of FFSP06 with economic development at the expense of the environment. CS07 finds space to describe St Andrews as an “economic driver”, but not to mention the need for its Green Belt - a concept mentioned only in relation to Dunfermline. HLRR07, with its tunnel vision, fails to see that housing can be used not only to kick-start economic development, but also transportation improvements. Indeed, the failure to solve the transportation problems of St Andrews is highly likely to impact adversely on both its tourist trade and its university. We argued last year (CC06 para 67.) that the Structure Plan proposals for the town should be built around the target of reinstating the rail link, using the methodology employed in the context of the Edinburgh South Suburban scheme, and elsewhere, for making rail projects viable by linkage to associated development. For efficient transport interchange, it is vital that land at the St Andrews end be safeguarded from development, so that a rail link can get as close to the bus station as possible. Fife Council’s failure to take appropriate action on this matter is already endangering the prospects for long-term resolution of the transportation problems of the town.

### **Housing for local need**

6. Recently the national media have carried stories about the need to increase the rate of house-building. Reactions to the story depend largely on the type of housing that would be provided. The prospect of renewed council house building has also been raised and is likely to be widely welcomed. As a Community Council, we wish to see the provision of more rented accommodation and of housing that will remain affordable in perpetuity. We had reservations about the strategy of FFSP06 and, if council house building were to be resumed, it would start to look dated. CS07 says that the aim is to encourage “a mixture of tenure and type including affordable housing and the high end of the executive market”. There is never any shortage of developers who wish to make profits by building for the high end of the executive market in St Andrews, but, in the absence of new council house building, so long as affordable housing is to be obtained only as a spin-off from luxury homes, the prospects for gaining significant amounts of housing for local need look poor. It needed little imagination to foresee developers in St Andrews indulging in special pleading that affordable housing would be out of place on their sites, and we could already envisage the officials’, in their time-honoured phrase, advising the committee that “the proposals are acceptable”. We would therefore again seek the disaggregation of the housing land requirement by type and tenure (CC06 para. 58). It does not make any sense to generate the housing land requirement on the basis of households of size 2.1, and then give consent to housing sites full of four and five bedroom properties (CC06 para. 54). It is better for land in St Andrews to remain undeveloped rather than be squandered on providing housing that caters predominantly for the well-to-do rather than addressing local need (CC06 para. 57).

### **Shortcomings of the documentation**

7. A major factor delaying our response has been the poor quality of the documentation. We assume that most respondents will have been content to comment on the conclusions of HLRR07, which will thus have avoided the very difficult task Fife Council appears to have set readers of TBR07 who wished to follow the details of the calculations. If the truth of our arguments is confirmed, there are parts of this documentation which are seriously misleading, casting doubt on the validity of the consultation phase that relied upon it. There is also often a suspicion that such documents are written to support pre-chosen

conclusions. In the present case, the way in which the figures, several of which lack detailed justifications, yield a shortfall under the preferred option of exactly 3,000 units for the St Andrews HMA will do little to allay such thoughts.

8. It is hard to believe that Fife Council actually wished to encourage people to check for themselves the calculations in TBR07. Its clarity does indeed compare badly with that of last year's Report of Survey (RoS06), which itself was less clear than that (RoS05) with the Draft Structure Plan in 2005. In the present case, it would have been helpful if calculation of the housing land requirement had been reworked in tabular form from the beginning rather than as adjustments in textual form to the Finalised Structure Plan. Anyone wishing to verify the results would also have appreciated more precise referencing that gave them chapter and verse for the figures used. If there had been any genuine desire to communicate with the public, Fife Council would have provided appropriate explanation in the many places it has chosen to change its methodology from that which it employed only last year. As it is, for example, contributions from windfall sites were set against the housing land requirement in 2006, but, in TBR07, the word "windfall" is never mentioned, and the reader is left to work out where these numbers may have been subsumed. Some commentary should also have been provided where the numbers adopted differed markedly from those in RoS06. The most spectacular of these is the way in which the predicted contribution from small sites in the St Andrews Housing Market Area (HMA) has been reduced in from 600 over a 20 year period to a mere 60 over a 19 year one. We fail to see how this can be correct.

#### **Discarding of 2004-based GROS projections well-judged**

9. On a more positive note, there are some aspects of HHLR07 that we welcome. There are explicit statements that the projections by the GROS constitute extrapolation of present trends rather than forecasts – a point that we stressed in our submission last year (CC06, paras. 5 and 32). We are also happy to endorse Fife Council's recognition that the 2004-based GROS household projections do not provide an appropriate basis from which to determine the housing land requirement. The GROS statisticians indicate that one general role of their projections is to give warning of undesirable consequences if policy change is not implemented, and we see their 2004-based projection of 9% population growth in Fife over 20 years as falling in this category.

#### **Instability of projections**

10. The instability of the GROS projections illustrates another salutary general point. In any ongoing predictive exercise there is always a need to strike a balance between using a method which is insensitive to genuine changes in the variable being predicted and one which over-reacts to short term noise. Unless radical changes have occurred, sudden major amendments to predictions merely serve as frank admission that one, or possibly both, predictions are wide of the mark. The instability in the GROS projections for Fife indicates that they are extrapolations of rather short-term trends, and suggests the need for a projection giving less weight to the most recent readings. This is not the occasion on which to pursue the question of GROS projections, but similar remarks can be made about other elements in Fife's calculation of the housing shortfall. For instance for the St Andrews HMA, the 2005 Urban Capacity Study estimated the supplies for the four 5-year periods of the Structure Plan as 349, 513, 255 and 175, a total of 1292. HLRR07 uses the corresponding figures from the 2006 Study which are 250, 282, 95 and 50, a total of 677. If these numbers can change so radically in one year they can hardly be regarded as a sound basis for inference over a 20 year period.

### **Shortcomings of Fife's Housing Land Requirement Reappraisal**

#### **The national picture**

11. It appears to us that the reader of TBR07 is being given a rather misleading impression of the predicted national situation. Using the 2004-based statistics, the GROS predictions of the Scottish population in 2006 and 2024 are 5,108,472 and 5,118,926 respectively, an increase of 0.20%. HHLR07 para. 1.26 indicates correctly that the increase in households is projected to be much larger than the population increase, but appears guilty of some considerable exaggeration when it says "For example, with only 0.8% population growth projected, GROS project an increase of 39%, or 297480 extra households, for

Scotland by 2024.” In fact GROS’s 2004-based projection is for 2,286,660 households in 2006 and 2,540,850 in 2024, an increase of 11.1%.

### The planning horizon

12. Of our various concerns about the methodology used in HLRR07, the failure to abide by central government advice on the planning horizon remains one of the greatest, given its major impact on the figures. We noted last year that SPP 3, para 61, says, “**The structure plan should identify the overall housing land requirement for a period of 12 years from the plan’s expected date of approval**”, and that the same wording is repeated in PAN 38, para. 10. Para. 15 of PAN 38 goes on to say “**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. Para. 9 of PAN 38 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**”.

13. The procedure that Fife has followed has shown the truth of these words. Some components of the calculation have changed so radically in one year, it becomes obvious that predicting over a lead time of 19 years is whistling in the wind. (We are not clear why 2026 is retained as the end date for the Plan, implying, as it does, this rather bizarre Plan period of 19 years. Reducing the Plan period by a year yields the minor improvement of a slightly shorter lead time for the forecasts, but we assume that was not its motivation!) We regard it as obvious that much more robust predictions can be made by heeding the governmental advice and restricting precise predictions to a lead time of 12 years.

### The impact of the mean household size

14. There appears to us to be a basic flaw in the logic of the second bullet point of para. 4.21 of TBR07. This bullet point tackles the question of how the housing land requirement should be adjusted in the light of the revised household size projections from GROS. We would argue as follows. If, at the start of the plan period, there is a population of size  $p_1$  and a mean household size of  $s_1$ , they form  $p_1/s_1$  households. If by the end of the period the population has risen to  $p_2$  and the mean household size has become  $s_2$ , there are

now  $p_2/s_2$  households. The extra number of homes required is  $e_1 = \frac{p_2}{s_2} - \frac{p_1}{s_1}$ . Suppose that, after further

investigation, it is decided that the initial population is  $p_3$  and the mean household size is  $s_3$ , and that at the end of the period there will be  $p_4$  people living in households of mean size  $s_4$ . The extra number of homes

required is thus revised to  $e_2 = \frac{p_4}{s_4} - \frac{p_3}{s_3}$ . The reduction in the number of extra houses needed is therefore

$e_1 - e_2 = \left( \frac{p_4}{s_4} - \frac{p_3}{s_3} \right) - \left( \frac{p_2}{s_2} - \frac{p_1}{s_1} \right)$ . Various special cases may be relevant. For example, the final population

may not have changed, so that  $p_4 = p_2$ .

15. The second bullet point of para. 4.21 of TBR07 takes the increment  $e_1$  and argues that, of these extra households, the number due to the change in the mean household size is  $e_1(s_1 - s_2)$ . It claims that, of the extra households required under the second scenario, the number due to the change in the mean household size is  $e_2(s_3 - s_4)$ , and hence that the reduction in the number of extra households is  $e_1(s_1 - s_2) - e_2(s_3 - s_4)$ .

In fact, even the first part of this argument looks to be wrong. Consider the village of Kilrymont comprising  $p_1=100$  peasants, whose average household size is  $s_1=2.5$  and who thus occupy  $p_1/s_1=40$  huts. It plans a

10% expansion taking its population to  $p_2=110$ . If average household sizes stay unchanged, an extra 4 huts will be needed. The sages of Ladywell, however, say that the mean household size will drop to  $s_2=2$ , so the population of 110 will need  $p_2/s_2 = 55$  huts. So, in total an extra  $e_1 = \frac{p_2}{s_2} - \frac{p_1}{s_1} = 15$  huts are required, of which 11 are attributable to the change in mean household size. The methodology of para. 4.21 of TBR07 incorrectly implies that the increase attributable to this change is  $e_1(s_1 - s_2) = 15(2.5 - 2) = 7.5$ .

16. GROS’s 2002-based predictions of the population of Fife in 2007 and 2018 were 352,369 and 355,349. A crude linear extrapolation to 2026 suggests a population of 357,516, which is close to the approximation of 358,000 used in RoS05 para. 5.244. A population of 357,516 represents an increase of 1.46% over the 2007 figure. Last year FFSP06 argued that the baseline population for 2006 should be adjusted to 357,000, and application of Fife’s desired rate of increase of 5% over 20 years suggests a further adjustment of the baseline population for 2007 to 357,893. If the 1.46% increase inherent in GROS’s 2002-based predictions is applied to this baseline, the implied population of Fife for 2026 is 363,118.

17. In predicting mean household size, GROS exclude people resident in communal establishments before dividing predicted non-communal population size by the predicted number of households. Thus the 2004-based predictions for 2007 of 159,310 households in Fife and a mean household size of 2.219703 imply a non-communal population of 353621. Thus, of the predicted 360662 people in Fife in 2007, some 7,041 were predicted to stay in communal establishments. Similar calculations on the corresponding figures for later years show that this number is predicted to rise steadily to 8,211 by 2024. A crude extrapolation gives suggests 8,348 people in communal establishments by 2026. Thus of the prediction of 363,118 people in Fife in 2026, the predicted number in non-communal establishments is 354,770.

**Table 1 : Change in number of households under 2002-based rate of expansion**

	Population	Households
Baseline population in 2007	357,893	
Baseline households in 2007		159,310
Population in 2026 under GROS’s 2002-based increase of 1.46%	363,118	
People in communal establishments	8,348	
Non-communal population in 2026	354,770	176,502
Change in number of households		17,192

18. Now, CS07 para. App. 3.34 deems it appropriate to accept the 2004-based mean household size predictions, and the GROS figure for 2024 is 2.03. Extrapolating this figure to 2026, we divide the non-communal population of 354,770 by 2.01 to get a prediction of 176,502 households in 2026. Hence, assuming the 2002-based rate of population increase, the resulting increase in the number of households is 17,192. **This indicates that the TBR07 figure for housing need of 21,426 is an over-estimate by 4,234.**

**Growth rates**

19. We support the concept of differential growth rates for the different HMAs in Fife, but the logic of the chosen rates appears questionable. There is indeed a sound case for lower rates in East Fife, but it is hard to see how rates of 5.3% for Dunfermline and 5.0% for Kirkcaldy reflect what FSP06 para 17 called the “focus of this Structure Plan on mid-Fife regeneration”. TBR07 para. 4.43 does not explain precisely how the differential growth rates have been applied. The housing requirements for the four HMAs shown in Table 9 differ somewhat from those that are implied by the population proportions shown in Table 8 taken together with the desired growth rates in Table 9.

20. The question of an acceptable growth rate for Fife cannot be separated from the choice of planning horizon. We continue to believe that the target of 5% growth over a 20 year period is not viable, particularly in terms of its adverse effects on other local authorities. Application of the implied annual growth rate may,

however, be sustainable over a shorter period. This illustrates another reason for adhering to the governmental recommendation of a 12 year horizon for detailed planning, ensuring, as it does, that the viability of the strategy is reassessed after that time. Our own proposal given below therefore adopts the corresponding rates over the 12 year period.

### Summary

21. **We object to all three options for the housing land requirement specified in Table 1 of CS07. To accord with PAN 38 the requirement should be specified with precision for only a 12 year period. Moreover, we fail to see the rationale for the methodology adopted, and believe that it has led to a very substantial over-estimation of the requirement.**

### Small Sites

22. **We object to the small sites contributions proposed in TBR07 Table 7, which appear to be only around 5% of the levels suggested by the recent data.** TBR07 provides no justification for the figures it uses as these small sites contributions for the HMAs, despite the radical changes from previous practice. We have already noted above the startling reduction in the assumed contribution for the St Andrews HMA compared to that advocated in RoS06 para. 3.282. The reduction for the Cupar HMA is almost as dramatic, with 400 units cut to just 47. The change for the Dunfermline and Kirkcaldy HMAs is in the opposite direction, as Fife Council contended in Ros05 para. 5.268 and RoS06 para. 3.281 that a zero contribution was appropriate for these HMAs.

23. It is evident that the small sites contributions for Cupar and St Andrews have not been subsumed elsewhere in the calculations. Fife Urban Capacity Study 2006, para 3.3, notes that “Within the urban areas, only sites of five units or over are included within the survey”. Fife Housing Land Review 2006, para 3.3, says that “The established land supply does not include . . . sites of fewer than 5 units”.

24. TBR07 Table 7 proposes small site contributions for the Dunfermline, Kirkcaldy, Cupar and St Andrews HMAs of 82, 57, 47 and 60, a total of 246 for a 20 year period. The Fife Housing Review 2006 Fig. 3.4 indicates that in the *one* year 2005-06 there was also a total of exactly 246 completions on small sites in Fife, and that the year before there had been 256. **These figures suggest that realistic contributions from small sites may be up to 20 times larger than those that have been assumed.**

### Strategic Land Areas

25. Fife Council slipped the notion of Strategic Development Areas into FFSP06 after the main consultation phase on the plan, so it was not subject at that stage to proper public scrutiny. The same concept has been retained in HLRR07, albeit renamed as Strategic Land Areas (SLAs). This Community Council remains strongly opposed not only to their proposed sizes, and to the proposed location of the one proposed for St Andrews, but also to their concept. As can be seen below, the first of these points remains an automatic consequence of the result that, if the housing land requirement is calculated in accordance with PAN 38, the minimum housing allocation for the St Andrews and Cupar SLAs exceeds the housing shortfall for these HMAs. We also object to the description “St Andrews West” for an SLA, and to the implied location - to the extent that such nomenclature defines a location. Structure Plans should be accurately written, not presented on the basis that “we know what we mean by these words”.

26. This Community Council retains its long-held view that housing development in St Andrews should be focussed on the Kinness valley. This view is consistent with StASS, which opposed large-scale development on greenfield land. Its conclusions stated that “There is a need to contain the spread of the town . . .”, that “St Andrews is at its landscape capacity and no major expansion should take place” and 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.” There is still ample scope in the Kinness valley for development on the scale required, and it keeps environmental damage to a minimum.

27. It is indeed inherent in the whole concept of the SLA that environmental considerations should take a back seat. This was true of many aspects of FSP06, and even now we do not have a full Strategic

Environmental Assessment for the Structure Plan in total. It is much better for site allocation to be carried out at Local Plan level unconstrained by arbitrary assignments made by those who give no indication that they have read the reports by Tyldsley and by Alison Grant on landscape assessment and capacity. Adoption of the “St Andrews West” SLA would pre-empt consideration of the Green Belt boundaries in the Local Plan process, undermining the Belt before it is even in place.

28. We object to much of tenor of the paragraph on page 20 of CS07 about the proposed St Andrews West SLA. We read again that “The strategy for St Andrews remains to release the town’s potential as an economic driver for the whole of Fife”. We commented last year (CC06 para. 20) on the unreality of this aspiration. Despite being an unattainable goal, it serves as a clear warning of Fife’s intention to continue to try to exploit the town for financial gain. Given Fife’s dismissive attitude to its own Strategic Study on the town, assurances on protecting the town’s “internationally important heritage” ring hollow indeed. The writer clearly lacks the conviction of the Fife officials who concluded in the Strategic Study that “The landscape character of St Andrews is crucial to its character and must be protected and enhanced”. To date, local opinion has had little impact on the Structure Plan exercise, and so few will gain much solace from the promise that the community will be involved in “masterplanning the development area”. St Andrews does indeed have a serious need for affordable housing, but, as we have said above, this Structure Plan looks likely to deliver far more at the luxury end of the spectrum.

### Summary

29. **We object to the concept of Strategic Land Allocations, believing that site allocation should be left entirely to the Local Plans. In particular, we object to the proposed location, name and size of the “St Andrews West” SLA.**

### A recalculation of the Housing Shortfall

30. We have expressed concerns above about the legitimacy of the methodology used by Fife Council in HLRR07 to calculate the housing shortfall. In particular we have disputed the manner in which the housing land requirement has been derived by modifying the approach in FSP06. We present here a proposed recalculation of the housing shortfall, re-worked from first principles. Adhering to our recommendation of a 12 year horizon for detailed planning, our approach focuses on the period 2007-19 rather than the 2006-18 period that we used last year.

### The non-communal population

31. In Table 2, the baseline population of Fife for 2007, as obtained in para. 16 above, is divided between the HMAs using the 2006 proportions in RoS06 Table 3.22 which will be a close approximation. The total number of people resident in communal establishments in 2007 is as derived in para. 17 above. We estimate that the university residences and other residential establishments in the St Andrews HMA account for approximately 3800 of that number. The remainder has been divided between the HMAs according to the population proportions used for the first column. The third column of Table 2 gives the resulting non-communal populations for each HMA, and the fourth the implied percentages of the non-communal populations. These are given here to 1 d.p., but exact values are used in the subsequent calculations. Note that figures for the population in communal establishments is based on the more conservative 2004 data: the 2002-based figures suggest rather larger numbers.

**Table 2 : Division of baseline non-communal population by HMA**

HMA	Population 2007	Population in communal establishments	Population in non-communal establishments	Percentages of non-communal population
Dunfermline	133,852	1,406	132,446	37.7
Kirkcaldy	146,736	1,541	145,195	41.4
Cupar	27,916	294	27,622	7.9
St Andrews	49,389	3,800	45,589	13.0
Total	357,893	7,041	350,852	100

### Household change between 2006 and 2018

32. The 2004-based GROS figures predict the number of households in Fife in 2007 as 159,310 and the mean household size as 2.22. In Table 3, we disaggregate the total of 159,310 between the four HMAs according to their non-communal population proportions given in Table 2. The 2004-based GROS prediction of the mean household size for 2019 is 2.07. In the column of Table 3 headed zero-growth households, we therefore increase the number of households by the ratio 2.22/2.07. Last year Fife Council argued for a uniform 5% population increase over 20 years. This year Fife Council proposes increases of 5.3, 5.0, 4.7 and 4.5 for Dunfermline, Kirkcaldy, Cupar and St Andrews respectively. If these growth rates are taken to apply to a 20 year period, the corresponding rates for 12 years are as shown in the 12 year growth rate column of Table 3. The penultimate column gives the number of households that arise in 2019 allowing for both the reduction in the mean household size and the given 12 year growth rates. The final column gives the resulting change in the number of households between 2007 and 2019.

**Table 3 : Predicted population change by HMA**

HMA	Percentages of non-communal population	Baseline no. of households 2007	Zero growth households in 2019	12 year Growth rate	Target households 2019	Household change 2007-19
Dunfermline	37.7	60,139	64,497	3.18	66,548	6,409
Kirkcaldy	41.4	65,928	70,705	3.00	72,827	6,899
Cupar	7.9	12,542	13,451	2.82	13,830	1,288
St Andrews	13.0	20,701	22,201	2.70	22,800	2,099
Total	100.0	159,310	170,854		176,005	16,695

### Housing Need

33. In Table 4, the total household changes derived in Table 3 are augmented as a result of demolitions, vacancies and flexibility. The demolitions column differs from the one we used a year ago only in the amalgamation of the two Dunfermline HMAs. Fife Council is arguing this year for a higher allowance of 4.6% for vacancies, but has not presented the data to justify the change. We argued last year (CC06 para. 42) that the data presented indicated that a lower rate was appropriate for the St Andrews and Cupar HMAs. Adopting a similar approach in Table 4 we have applied an allowance of 4.6% for vacancies in the Dunfermline and Kirkcaldy HMAs, and a 3% allowance in the St Andrews and Cupar HMAs. As the reader may have noted, our calculation of household change adopted the mean household size at the planning horizon in contrast to Fife Council's use of the mean over the plan period. As our approach thus already provides an element of flexibility, we use here a flexibility addition (additional demand allowance in the parlance of RoS05) of 5% rather than 10%.

**Table 4 : Housing Need 2007-2019**

HMA	Total household change	Demolitions	Vacancies	Total need	5% flexibility	Housing requirement
Dunfermline 1	6,409	360	295	7,064	353	7,417
Kirkcaldy	6,899	400	317	7,616	381	7,997
Cupar	1,288	20	39	1,347	67	1,414
St Andrews	2,099	20	63	2,182	109	2,291
Total	16,695	800	714	18,209	910	19,119

### Calculation of the Housing Shortfall

34. In Table 5, the contributing supply is as shown in TBR07 and corresponds to the effective land supply given in Fig. 2 of the Fife Housing Land Review 2006. The urban capacity supply was taken from Table 3 of the Fife Urban Capacity Study 2006. For each HMA, the given figure corresponds to 70% of the sum formed by adding the urban capacity supply up to 2016 to 60% of the supply from 2016-21. As we implied last year (CC06 para. 47), the use of 70% proportion may be unduly conservative. Compared to the



recent data in the Fife Housing Land Review 2006, the small sites contributions we have used for Dunfermline and Kirkcaldy are very conservative estimates, being around half of what might be predicted. They are nonetheless six times larger than those proposed in TBR07. The corresponding contributions for Cupar and St Andrews mirror those that we used last year, the explanation being provided in paras. 50 and 51 of CC06.

**Table 5 : Calculation of the Housing Shortfall**

	Housing requirement	Contributing Supply	Urban capacity supply	Small sites	Shortfall
Dunfermline	7,417	4,529	1,021	492	1,375
Kirkcaldy	7,997	3,615	1,562	342	2,478
Cupar	1,414	357	93	576	388
St Andrews	2,291	315	412	864	700
Total	19,119	8,816	3,088	2,274	4,941

### Summary

35. **We object to all three versions of the housing shortfall figures specified in Table 1 of CS07, and propose that they should be revised as shown in Table 5 above.** The overall shortfall for Fife of 4,941 is clearly radically different from the figure of 18,460 under Fife Council's preferred option in HLRR07. Approximately 10,000 of this difference lies in the different housing need figures, with the greater part of this 10,000 due to the different planning horizons of 12 and 20 years. As we have seen, however, over 4,000 is due to what we regard as an erroneous way of allowing for the change in the projected mean household size. In calculating the shortfall, we have also argued that small sites will contribute over 2,000 units more than in HLRR07. The discrepancy between the shortfall calculated here and that in HLRR07 would have been still larger if we had used less conservative estimates of the small sites contributions for Dunfermline and Kirkcaldy.

Yours faithfully,

Ian Goudie  
Vice-Chair.

### Appendix : Summary of non-standard abbreviations

HLRR07 : Fife Council's Housing Land Requirement Reappraisal, 2007

CS07 : Consultative Statement for HLRR07

FFSP06 : Finalised Fife Structure Plan, 2006.

RoS06 : Report of Survey for the FFSP

RoS05 : Report of Survey for the Draft Fife Structure Plan, 2005

SEA : Strategic Environmental Assessment of HLRR07

SLA : Strategic Land Area

StASS : St Andrews Strategic Study, 1998

TBR07 : Technical Background Report to HLRR07