

THE ROYAL BURGH OF ST ANDREWS COMMUNITY COUNCIL

Local Plan Hearing 4/10/11 Comments on Statements

Overview

The St Andrews West Consortium (StAWC) stresses the importance of the needs of the University of St Andrews. Their case is generally over-stated: a number of elements in it do not accord with reality. Although the need to cater for some University expansion is not in dispute, it remains unfortunate that Fife Council (FC) appears to have advised the University about a decade ago that the only way to achieve that expansion was by building the very expensive road up the raised beach from the A91. The over-blown proposed scheme has "pre-recession" written all over it, with the whole house of cards resting on that initial error.

Even if granted consent, the probability that the road up the raised beach will be built in the Local Plan (LP) period is rapidly diminishing. Despite various attempts to talk up the housing market, awareness is growing that recovery from this recession is likely to be very slow with numerous false dawns. In these circumstances, if, despite our representations, planning consent is given for development north of the High Road, any prudent developer would work from that road rather than the A91. Economic reality thus pushes the solution for University expansion closer to the one that would have emerged had the major organisations adopted a consensual approach with the local community rather than an adversarial one. Such an approach would have obviated the supposed need for more than 1000 houses – a figure always based on infrastructural costs rather than projected employment generation.

Accepting the constraints of the Structure Plan (SP) need not, however, imply a cavalier approach to the use of greenfield land. Broadly, what the local community wants from this hearing is the minimal use of greenfield land that is SP compliant, with any necessary greenfield development located in the Kinness valley.

1. Structure Plan (SP) requirements for St Andrews West SLA

FC\$1.9 references FC's Housing Land Statement (HLS). Figures 1 and 2 of HLS do not comply with SP Proposals PH2 and PH3. The allocation of 630 units to St Andrews West for the Plan period (FC\$1.1) is only compatible with PH2 and PH3 of SP if, contrary to Figure 2, the additional 90 units are all allocated to the pre-2018 periods. The 280 units for St Andrews West for 2008/13 are not compatible with SP: the number should be at most 222.

Note that although HLSp7 refers to "the major Strategic Land Allocations at St Andrews West and Cupar North being phased both later and slower than envisaged by the Fife Structure Plan 2009", our statistics above indicate that units have been moved *earlier* rather than later. HLSp7 also appears to envisage a considerably earlier phasing of St Andrews West than the Fife Housing Land Audit 2010.

HLSp12 appears willing to concede that SP phasing has ceased to be realistic when it says "While the site programming contained in the Fife Housing Land Audit 2010 does not meet the Structure Plan requirement, it is regarded as a realistic and pragmatic view of likely delivery". The same realism is not, however, in evidence elsewhere. In particular, the definition of what constitutes a five-year supply should be based on current realities and not on nostalgic memories of a bygone age. It is, furthermore, not just the phasing of the SP that is out-of-date: the overall concept of St Andrews West needs drastic slimming to bring it up-to-date.

FC\$1.1 illustrates how FC is attempting to write the Local Plan from 2018 to 2026 simultaneously with the one up to 2018. This appears contrary to both SPP3§39 and SPP§72 which both required allocation up to year 10 from predicted adoption.

The work of this hearing is being hampered by the failure to provide an exhaustive breakdown of the proposed St Andrews West site, or even any clear indication of the total amount of housing land proposed there. What is offered is more an artist's impression than a plan. In our view there should have been full public information and consultation on precisely which housing sites there are to be designated for development by 2018, their sizes and proposed densities. Since LP2005, the drafts have become ever woollier, thus obstructing public engagement.

1(a) Protection of landscape setting

Our objection (CC2010§53) expresses our opposition to the change from AGLVs discussed in FC§1.5.

1(b)(i) Minimum 1000 houses to 2026 (Large proportion to west of town, maximise brownfield land)

Unlike FC§1.8-1.10, SP§2.4 makes it abundantly clear that it is NOT requiring all 1000 houses to be located to the west of the town. Moreover SP§2.4 is clearly calling for maximum use of brownfield land within the existing settlement, as FC knew there was none to the west of the town. This was indeed FC's position since the Report of Survey 2006 (p.30) which said that, for the St Andrews SDA, it would be "maximising the use of brownfield sites where possible." So the clear indication from the SP is that "other sites in St Andrews" (FC\$1.9) should contribute to the 1090 houses.

CC2010§14 listed brownfield/infill capacity for 380 units at 169-173 South St, New Park School, St Leonards Fields/Memorial Hospital and the East Sands. This total rises to 420 if the new Madras is not in South St, and to 620 if it is neither there nor at Kilrymont. The promotion of the old healthcare site for office use also flies in the face of local wishes. FC's attempts to make greenfield development look necessary run completely contrary to the aspirations of SP.

1(c) Up to 90 additional houses following further assessment

There has been no public consultation on FC's decision (FC§1.12) to allocate all 90 to St Andrews West rather than a proportion to the East Neuk settlements SLA. Even before the demise of the school project, there was considerably more land at St Andrews West than is required: the proposed area would absorb an extra 490 at least!

1(de) 10 hectare science park, 10 hectare business park

We are not surprised that FC feels a continuing need to justify these excessive allocations. Accepting them as SP requirements, our recommendations remain as in our Statement.

1(f) Link road

It is unsatisfactory that the justifications for this Link Road rely solely on FC's Transportation Services. If a link to the A91 is indeed a "necessity" (FC\$1.20), its construction should be a precondition of any work on St Andrews West commencing. It is again completely unsatisfactory that the specification for this proposed road is not yet available. The devil, as ever, is in the detail. It is reckless to blithely assume that a safe solution can be found later.

Our experience indicates that the vast majority of the required 1090 strategic houses will end up as upmarket properties. If these are sited anywhere on greenfield land the clear evidence from the Craigtoun B development is that an assumption of two vehicles per household would be conservative. It is scandalous, if, as appears to be the case, the mountainous paperwork does not include any quantified assessment of the highly deleterious effect of 2000 extra vehicles on the town centre.

The way to "minimise the impact of the development on the town centre" (FC\$1.20) is to follow the SP philosophy and maximise the use of brownfield sites in the town. Residents within walking distance don't need to use cars. The number of St Andreans who will use a park and ride on the A91 is minimal.

2. Boundaries of STA 01/western and south-western part of inner green belt (GB)

2(a) Excluding Strathtyrum (OPP5) from STA 01

Despite FC§2.5, there appears to be no good reason for excluding OPP5. If the Guardbridge mill site is not chosen for the Science Park, OPP5 looks an ideal candidate given its proximity to the science schools of the University. Its use would have very little negative impact on views seen when approaching on the A91.

2(c) Langlands

Even if Grant's conclusion (FC§2.10) that a 15m high building will not cut the skyline is technically correct, it answers the wrong question. Any building on the northern part of Langlands will severely damage the view from the ancient approach road from Strathkinness. Following the demise of the proposal to site Madras College here, there is virtually no support at all in the town for developing this area. The imperative becomes to preserve the open view from the High Road, particularly in view of recent SNP-backed plans to reinstate the pilgrim route from Iona to St Andrews.

2(de)West of Northbank Farm, Headon Developments representation

It is unclear whom FC§2.11 expects to be impressed by a promise of "community engagement"! The town is utterly opposed to development in these areas.

2(f) Between Strathkinness High and Low Roads

FC§2.14 flies in the face of observations over decades by thousands of local people. Development here would be very damaging to views from the west, the south and even from north of the Tay.

2(ghi) Between Strathkinness Low Road and Craigtoun Road, SE of Craigtoun Road, & Macdonald Estates proposal

The local community has no respect at all for the Fife Local Landscape Designation Review (2009)(FC§2.16-7). We valued the AGLV designations which were weak but sensible. The proposed Special Landscape Area at the Craigtoun Road was a blatant attempt to support development north of the Low Road.

Contrary to FC§2.19, the Craigtoun area is closer to Morrison's supermarket and the hospital than sites north of the Low Road. The relevant distance from the town centre is that by road which is little different. To encourage walking you need to develop the brownfield sites in town.

2(jk) STA 05 to east of hospital, area proposed at Pipelands by Muir Group

FC's attempt (FC§2.20) to redefine the southern hillside is disingenuous. As indicated in our Statement, there are better possible sites for employment use. The town is vehemently opposed to further encroachment on the southern hillside.

3. Miscellaneous issues

3(a) Including existing Madras College sites in STA 01

The use of one of the former school sites for the new Madras looks somewhat less likely than when our Statement was written, making their inclusion in STA 01 the more important.

3(b) Employment use at Craigtoun

As indicated in our Statement, we support employment use for this site if the better options are not accepted. We hope that employment use for Guardbridge will not be excluded by a fundamentalist interpretation of SP. We regard as somewhat unseemly the protestations on employment land (FC§3.3-3.4) of a Council that was driving tradesmen out of Bassaguard.

3(d) FC Planning Committee decisions 7/9/2009

3(d) (ii) Relocate cemetery site to west of link road

The plan proposal for a 4 ha. extension seems excessive.

4. St Andrews West Development Framework

(a) Indicative boundary

SPP§159 says "Green belt designation should provide clarity and certainty on where development will and will not take place". FC§1.2 and FC§4.1 imply that GB boundaries are being manipulated to suit developer convenience.

4(d) Alison Grant's 2009 recommendations

In contrast to FC§4.6 the historical record suggests that any restrictions on development heights are liable in practice to be circumvented.

Public opinion

StAWC§1.6 is incorrect in asserting that objections to the Consortium's proposals are not widely held. No statistical expertise is required to appreciate that, even 21 months ago, document StAWC 8 did not provide a basis for serious statistical inference about the views of residents. The number of residents objecting to STA 01 reflects extreme consultation fatigue. They are tired of repeatedly telling a Council that doesn't listen that they don't want the western development: they have been doing so since the mid 1990s research for the Strategic Study.

StAWC6 includes Appendix B of the minutes of the North East Fife Area Committee of 17 June 2009. The highlighted comments of the St Andrews local members briefly articulated the views of the town, and concur with some of the themes pursued by the Community Council at this hearing.