



# Royal Burgh of St. Andrews Community Council

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Sandra Carey,  
Scottish Government,  
Directorate for the Built Environment,  
Area 2-H,  
Victoria Quay,  
Edinburgh,  
EH6 6QQ,

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Dear Ms. Carey,

## **Strategic Environmental Assessment of the Proposed Modifications to the Finalised Fife Structure Plan 2006-2026**

Five years ago this Community Council looked on environmental assessment as a tool that might bring a new dawn in Scottish planning. Environmental implications of proposed developments were to be objectively and scientifically evaluated rather than just an afterthought. It is therefore very sad to see the extent to which this procedure has already been downgraded. The Strategic Environmental Assessment (SEA) on the proposed Modifications to the Finalised Fife Structure Plan must surely be a very pale shadow of what the European legislators envisaged. How long will it be before we acknowledge that Environmental Assessments carried out by the proponents of developments themselves are simply a waste of everyone's time? When carried out by government, as here, or by local government, they are also a waste of public money. It is obvious in advance that the assessors will say nothing that might undermine their proposals. So we are presented with a document which merely goes through the motions.

### **Damaging effects on St Andrews**

The authors of this report were no doubt given limited time to carry out another desk-based exercise, and it is perhaps not surprising that it fails to get to grips with the subject. Please realise though that, for us in St Andrews, this is not just another theoretical exercise. For anyone who lives or works in St Andrews this ill-researched Structure Plan and your Modifications will cause disruption to our lives on a daily basis, and lead to the destruction of a major part of the landscape setting of the town. Yet, despite the conclusions of the 1998 St Andrews Strategic Study 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 has been no detailed examination of the impact of the Structure Plan or of the latest Modifications upon the town.

### **Casual disregard of detail**

This SEA is a frank admission that the Scottish Government does not have a clue about the detailed environmental implications of the Fife Structure Plan and its own Modifications to it. Far from its intended purpose of providing a justification for a pre-chosen policy, in a more rational world this document would serve as basis for prosecution. It is evident that the bankers who caused the credit crunch had more understanding of the likely consequences of what they were doing than is the case here. In both situations, there is the same broad brush application of ill-thought out ideas that are believed to be the flavour of the month, with the same wanton disregard of vital detail.

### **Deliberate blindness**

Although this SEA is issued in the name of the Scottish government, it takes its inspiration from the archetypal English hero Nelson, who is supposed to have protested, “I see no ships”, whilst deliberately holding his telescope to his blind eye. It is indeed hard to escape the conclusion that the authors of this report decided before they started that the only environmental problems they would see would be ones for which they felt they could say that Fife Council could take mitigating action. There are indeed grave implications of the proposed Structure Plan, and of the Modifications to it, but this document runs no risk of revealing them or of upsetting the apple-cart.

### **Disregard for the environment**

In the last five years there has been a major, and ill-advised, housing boom in West Fife, providing homes for commuters into Edinburgh. This boom in the number of cross-Forth commuters did nothing for Scotland's carbon emissions. The proposed Structure Plan provides for a twenty year continuation of the use of Fife as a dormitory for Edinburgh. It is presumably judged that the future batches of commuters will provide further justification for the new Forth crossing. So we have a policy that, far from helping to reduce our carbon footprint, will add to our emissions year on year. This surely is the environmental policy of the mad-house.

### **Failure to consider real alternatives**

It is particularly disappointing that perusal of this Plan at national level has not resulted in it being viewed from a broader perspective. Although in conformity with the legislation, the SEA purports to consider alternatives, the chosen alternatives fail to acknowledge the wider picture. The “reasonable alternative” to continued growth in the use of Fife as an Edinburgh dormitory is presumably to build closer to Edinburgh, and it seems reasonable to expect a national government to have a view on the relative environmental merits of the two alternatives. This blinkered SEA also ignores the consequences of the Fife Structure Plan and its Modifications on Dundee. Rather than draining further population from that city, another “reasonable alternative” would be to attempt to halt its long-term population decline.

### **St Andrews West – slipping through the net**

In some respects, this Environmental Assessment is worse than useless. Six years ago the proposed “western development” for St Andrews was put on ice. It was generally assumed that the developers could not meet the requirements for an Environmental Impact Assessment (EIA). In responding to the Scoping Report for this EIA, this Community Council indicated what a full assessment of its environmental impact should entail. (See attached document.) Weasel word games are being played in the proposed Fife Structure Plan, with St Andrews West being proposed as a Strategic Land Allocation. Whilst it is maintained that this need not correspond to the previously defined “western development”, Fife officials are evidently manoeuvring to ensure that this is essentially so. If being blessed by the present bland Environmental Assessment allows these developers to circumvent any more thorough environmental investigation, they will indeed have been allowed to play their joker. There is, however, nothing amusing about the damage the western development will cause to the view of the town when approached from the west - a view that has been treasured for centuries. It is sadly ironic that the unprincipled manoeuvres to gain consent for this development come at a time when re-establishment of a pilgrimage route from Iona to St Andrews is under discussion.

### **Review of local landscape designations**

We regard it as scandalous that Fife Council's Review of local landscape designations in Fife should be treated as legitimate baseline data for the Environmental Assessment. In the case of St Andrews, this study - to accord it an academic label that it does not merit - turned on its head all previously understood wisdom about the relative merits of the various landscapes surrounding the town. It is clear that it had no option but to do so if it was both to pave the way for the “western development” and to exclude simultaneously the more rational options for development of the town. As the consultants were employed by Fife Council, only those completely unfamiliar with the workings of local government have expressed any surprise that they should reach such startling conclusions at a time so opportune for the Fife officials.

### **Statistical illiteracy**

It is sad to see that the SEA on the Modifications suffers from the same basic statistical illiteracy which infects the heart of the Fife Structure Plan itself. Para. 2.13 of the SEA says, "Further population projections suggest further growth (up to 11%) over the next 20 years as a result of inward migration". In earlier submissions on this Structure Plan, we have explained in simple language why this is a basic misunderstanding. It appears, however, that the planners at Fife Council and at the Scottish government prefer to continue disseminating their own statistical fairy tales, as those tales aid their own pre-chosen conclusions, reached on the basis of broad-brush political arguments that have nothing to do with the data.

### **Projections are not forecasts**

GROS population projections are produced by statistical tools that perform a similar role to a child's pantograph. The pantograph enables you to trace round a small image and produce a much larger version of the same thing. Similarly GROS extrapolation methods look at the rapid house-building in West Fife over the last five years and show you what happens if you continue it over a twenty year period. You don't need to be very numerate to realise that you build rather a lot of houses. The GROS demographers have explicitly said that they are not forecasting what will happen. In the context of household projections, for example, they said "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). Indeed, as we have noted in earlier correspondence, the demographers openly espouse the role of Dickens' Ghost of Christmas Yet To Come, showing what will happen if we carry on as we are currently doing, and fail to learn the lessons of the recent past. The expectation of GROS is that planners and politicians will have the common sense to ask whether the future that is being portrayed is one we wish to embrace, or whether a change of course might not be a much better idea.

Sadly their expectation is ill-founded. The planners at both local and national level do not wish to hear what an elementary error they are making. They prefer to believe that the GROS projections describe some inexorable natural process or some divinely decreed pilgrimage of peoples across the Forth. This is not so. If the words of Community Councillors are deemed unreliable, talk to any of the able statisticians in the Scottish government (some were taught here at the University of St Andrews!). They will confirm that the projections do not "suggest further growth", but merely tell you that if you continue over 20 years the same ill-advised policy of rapid creation of Edinburgh dormitories within Fife then a lot of inward migration will ensue. There is, however, absolutely no need to continue that policy. The Scottish Ministers are not being swept along by some demographic tsunami: it is perfectly within their power to steer a more environmentally rational course. We are ruled by men, not mice.

### **Lack of numeracy**

Were a visitor from outer space to read this report, he might assume that we belonged to a society that had not yet fully mastered the notion of numbers, and that we believed their use should usually be restricted to counting houses. The authors of this report would never have uncovered the reality of global warming, the detection of which depended on taking and evaluating quantitative measurements. It is, however, easy to see why they prefer a non-numeric approach. Numbers embody hard realities and truths, which are often difficult to disguise even when garnished with a thick layer of fudge.

### **Data that are required**

In contrast, the residents of St Andrews wish to see implications of this misguided Structure Plan and its Modifications set out in solid numerical terms. We live with an overcrowded town centre, constantly rising traffic levels and ever more frequent gridlock at the busiest points of the year. The Structure Plan and its Modifications will bring an avalanche of new housing, most of which will be top of the range housing that will do nothing to cater for local need. What will be the effects of the cars of all these new residents? How many more times a year will Bell Street grind to a halt? By how much will waiting times at junctions increase? How much will all this traffic queueing with engines running

add to the town's carbon emissions? These are all questions which Fife Council has failed to answer in proposing its Structure Plan. The Scottish Government is prepared to add casually another 90 houses to the Strategic Land Allocation, but equally knows not the effects of what it does. No insight at all is given by the statement (SEA, p.20) that the problem of “increased traffic congestion, leading to increased pollution” could be “positively or negatively affected by the proposed modifications, depending on the preferred development strategy progressed within the modifications”. In the findings for the St Andrews and N.E. Fife Housing Market Area on p. 41, we edge a little closer to the truth in the admission that “An increase in households overall will result in an increase in greenhouse gas emissions, thereby having negative effects on climate change objectives. This could be generated by transport, energy and waste requirements”. Although this section starts with the portentous words “the following key findings emerged”, the first of these sentences amounts to no more than the blindingly obvious, whilst the reason for the apparent uncertainty in the word “could” in the second sentence is unclear.

### **How effective can mitigation be?**

The remainder of this paragraph on p. 41 illustrates another fundamental methodological weakness that permeates large parts of this SEA. Time and again the reader is asked to believe that, no matter how dire the particular environmental consequence of the proposed development boom, there are always mitigating actions that can be taken. In this case we are told that “Emissions could be minimised by ensuring new development areas are accessible by public transport at the local development plan level”. At this point an SEA that was worth reading would be using numbers. There is methodology in place for estimating approximate carbon emissions. It can be calculated for the transport, heating and other needs of the residents of the 1000s of new houses brought about by this Structure Plan and the Modifications. The numerate would then be asking what proportion of these emissions can actually be avoided by the mitigation measures. It makes a huge difference whether the “Emissions could be minimised” at 20% of the total figure or only at 95%. If, in most cases where mitigation is advocated, the latter figure applies then this favoured form of words is a desperate fig-leaf for the Scottish Government to wear in the absence of environmental clothes. The failure to quantify anything means that this SEA finishes at the point where a worthwhile document would be beginning.

### **Naive assurances**

It is not only the numerate who will be offended by the trite formulae on offer. Those who have any practical experience of local politics will be unimpressed by the naive assurances on how easy it is to carry out appropriate mitigation. How, for instance, is Fife Council to ensure that “new development areas are accessible by public transport”? We can already hear the Council official coming to tell the Community Council that Stagecoach will not agree to run a bus to the new estate without major subsidy, that there is no money left in the Council coffers, and that we may as well forget it. That is the reality of local politics today. The Scottish Government may attempt to salve its conscience by saying that Fife Council will mitigate everything under the sun, but those in the real world will judge that it is more likely that we will see increased carbon emissions from flying pigs.

Yours sincerely,

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Vice-Chair