



# Royal Burgh of St. Andrews Community Council

10, Windsor Gardens,  
St Andrews.  
KY16 8XL

Mr R Presswood,  
Development Manager  
(Business and Strategy),  
Fife Council.

13 May 2005

Dear Mr Presswood,

## **The Draft Fife Structure Plan 2005**

1. I write on behalf of the Community Council to object to the Draft Structure Plan. Our objections are not only to a number of the detailed provisions of the Plan, but also to much of its underlying expansionist philosophy. We have been told at public meetings that the present document is but a draft which the public can mould, but are nonetheless surprised that so little attempt has been made so far to take on board the well-documented views of the town. There are many dangers in attempting to plan for a 20 year period, and the population and housing need projections in this Plan exhibit the pitfalls. Nevertheless the exercise does offer opportunities to analyse current problems and provide some long-term vision: it is disappointing that, as regards both affordable housing and transportation for St Andrews, those opportunities have not been grasped. There is indeed a considerable danger that this Plan raises false hopes on affordable housing while lacking the vision and power to deliver.

2. The overall impression of this Structure Plan is that it is development promotion on the grand scale with other considerations, such as environmental protection, given scant attention. The comparison with the 2002 Structure Plan is startling, with earlier policies weakened or omitted to smooth the way for the developer. Despite the veneer of science, the housing projections result more from the exercise of discretion than they do from any hard data. Whilst an element of flexibility for developers is a standard part of the procedure, the Draft Structure Plan hands the developers an additional cushion at most of the many points at which an arbitrary judgement is made. The compound effect of all these cushions has an enormous effect on the figures.

### **Procedural Complaints**

3. We feel obliged from the outset to record formally our dissatisfaction with the manner in which the present consultation exercise is being conducted. Whatever the claimed benefits for the public in being able to see the Local Plan implications of the proposed Structure Plan policies, we find it hard to escape the conclusion that the main motivation on the part of Fife Council for simultaneous consultations is to minimise both the number and the scope of the objections to the proposed Development Plan. There seems even less excuse for waiting until now to put the Area Transport Plan into the public domain when we have seen it used in correspondence by transportation officials for at least eighteen months to justify their actions. As a Community Council we have had little option but to direct our primary efforts at the Structure Plan. There is obviously overlap between the subjects addressed in the Area Transport Plan and the Structure Plan, and, as final decisions on matters such as the Structure Plan's approach to reinstatement of the rail link to St

Andrews may well lie in the hands of the Scottish Ministers, we trust that Fife Council does not intend to finalise the Area Transport Plan prematurely.

4. As well as avoiding simultaneous consultations on six important documents, there are also other ways in which Fife Council could have made participation in this exercise easier. We are aware of a complaint from the public that the package which purports to make available the maps for the Development Plan fails to operate on many standard platforms. For our own part, the imperfections of the Report of Survey (RoS) have added considerably to our difficulties in attempting to provide more realistic projections of future housing requirements. The whole rationale for such a document must surely be to provide the background information on which the Structure Plan proposals are based. In contrast, we find that at a number of key points, numbers appear like rabbits from hats with no supporting data nor even vague broad-brush arguments to justify the magnitudes of the chosen numbers. The brief search for data that we have managed in the limited time available suggests that much of the required information is not in the Fife Housing Review, and probably not in the public domain at all.

### **The Context of the Structure Plan**

5. The first questions that must be asked about this Structure Plan are “Why does it exist?”, “What is it intended to achieve?” and “Whose interests is it intended to serve?”. We had been led to understand that, despite the previous such Plan being produced as recently as 2002, the Scottish Executive required Fife Council to produce a new one extending the planning horizon to 2026. Reports in *The Courier* appear to cast some doubt on that, with Dundee Council suggesting a new Fife Structure Plan is not needed, and reminding people that should the Executive’s earlier proposals be implemented, Structure Plans would become the prerogative of the proposed City regions.

6. Whatever the formal position, the most plausible interpretation of recent events would appear to be that the Draft Structure Plan is driven by positional play by Fife Council in the context of the City region debate. This is perhaps most evident in the redrawing of the boundaries of East Fife, presumably to minimise territorial losses in the event of control of East Fife, for Structure Plan purposes, passing to Dundee. The whole philosophy of the Draft Structure Plan, however, looks to be playing to the gallery of the Scottish Executive rather than addressing local concerns. Certainly the reaction in most of East Fife suggests that if the Plan was designed to meet the aspirations of the local community, it has failed to meet this aim.

7. The Draft Structure Plan portrays a desire on the part of Fife Council to appear economically dynamic, but, nevertheless, it remains hard to see how its proposed strategy for Fife can fit into any coherent national strategy. It cannot be in the national interest to deplete further the populations of Scotland’s cities, so an intention to increase the population of Fife on the scale proposed would look questionable were Scotland’s indigenous population in a steady state. Such an approach looks even less appropriate at a time when the indigenous population is decreasing and the small net increase in the total population is due to immigrants. The medium-term continuation of this contribution cannot currently be guaranteed even by Holyrood as immigration is a reserved matter.

8. The Draft Structure Plan’s strategy for St Andrews looks to be formulated on an unquestioning acceptance by Fife Council of the Scottish Executive’s National Planning Framework (NPF). The assertion in the NPF that “There is considerable potential for building on the international profile of St Andrews as a leisure destination and centre of academic excellence” was formulated without reference to the residents of the town. Indeed the Scottish Executive has acknowledged in correspondence that this Community Council was not amongst those that were invited to comment on the NPF.

9. In considering the overall context of the Plan, we should also record that, in our eyes, the requirement for Structure Plans to cover a 20 year period appears to suggest a lack of joined up thinking at Scottish Executive level. The current reluctance of the General Register Office for Scotland (GROS) to extend mean household size projections beyond 2016 reflects a professional awareness that the uncertainties associated with projections over longer lead times render them too unreliable as a basis for decision-making. The requirement, however, that local authorities plan over a twenty year period leaves them with little option but to produce extrapolations of some nature, but it is anomalous that local authorities are being asked to boldly go where GROS has deemed it unwise to tread. As a minimum, central government should spell out procedures which ensure that local authorities do not imperil the possibility of sound medium-term inference by diluting GROS projections with unreliable long-term speculations. This is the statistical equivalent of paying for a top chef and then pouring ketchup all over the meal before you taste it.

### **The St Andrews Strategic Study**

10. It is particularly galling from the perspective of St Andrews that Fife Council's memory is so short. Following the public inquiry on the Local Plan in late 1994 and early 1995, Fife Region and then Fife Council devoted some considerable effort to the St Andrews Strategic Study, 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. Its findings 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.**

11. What astonishes us most is that Fife Council appears to think it can perform a complete volte face without being under any obligation to offer even the briefest explanation for its conduct. Perhaps Fife Council should re-read Conclusion 1 of the Study, which said that "There is considerable further potential for involving the community in actively influencing the future of the town". Whilst policy in any sphere is subject to gradual evolution, it is only possible to move from one stance to its exact opposite without total loss of credibility 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 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.

12. What is Fife Council's current view of the St Andrews Strategic Study that it produced? How does it square its present proposals with the Study? Are we to conclude that it now regards its own staff as misguided and the very many hours spent on its production as a waste of public money? Does it not realise the damage that it causes to its relationship with the town by its preference for its own short term political goals rather than the well-documented views of the local community?

### GREEN BELT

#### Policy ENV1 : Landscape setting of St Andrews and Dunfermline

13. This Community Council objects to the manner in which this policy has been diluted, compared to the formulation in the 2002 Structure Plan. Indeed the new policy appears intended to undermine the purpose of a Green Belt. This town fought long and hard to get the requirement for a Green Belt written into the 2002 Structure Plan. Even though our eventual success was due to the Scottish Ministers rather than a change of heart from Fife Council, we are surprised that Fife Council should back-pedal so soon on a policy that is so widely supported in this town. It suggests that Fife is indifferent not only to the views of St Andrews, but also to how it is viewed by the town. **We call on Fife Council to reintroduce a Green Belt policy as least as strong as that in the 2002 Structure Plan.** In particular, we seek a clear statement that there is a presumption against development in the Green Belt.

### SCHOOLS

14. Amongst the topics on which the Draft Structure Plan fails to provide a coherent vision for the future is the major one of secondary school provision in Fife. Indeed the notion that you can plan for 20 years without addressing the question of school education is astonishing. The omission is all the more grave as we are not speculating on some problem that might possibly arise in the future, but one with which North East Fife, at least, has lived for many years. Fife Council's views on appropriate school sizes are well out of line with practice elsewhere in Scotland. This can be seen very clearly in the school census data for September 2003, for which the email announcement was made in November 2004. From that data set, the ten largest secondary schools in Scotland are as follows:-

Local Authority	School Name	Secondary Roll
Glasgow City	Holyrood Secondary School	2,017
Fife	Dunfermline High School	1,779
Fife	Queen Anne High School	1,751
Fife	Madras College	1,748
Fife	Bell Baxter High School	1,733
Fife	Balwearie High School	1,714
East Renfrewshire	St Ninian's High School	1,695
Glasgow City	St Andrew's Secondary School	1,616
Falkirk	Larbert High School	1,589
Perth & Kinross	Perth High School	1,547

15. Fife's current policy impacts severely on North East Fife. The problems in St Andrews, with Madras College being on a split-site, have become increasingly acute over the last 20 years. The usual arguments that larger schools mean greater curriculum choice are heavily outweighed by the severe disadvantages experienced daily by the children who spend too much of their lives on school buses, giving an unnecessary increased exposure to the risk of traffic accidents and seriously curtailing their time for both homework and useful recreation. Fife's Draft Structure Plan says in Para. 3.46 that "Integrating land use planning with transportation will reduce the need to travel", but it has failed for many years to apply sustainability principles to the way in which it runs education in Fife.

16. **We call therefore, as we have done many times before, for the provision of a new school in North Fife.** This would yield major planning benefits for St Andrews. It would reduce housing demand in the town from parents who would prefer to stay in North Fife, but wish to avoid subjecting their children to bussing. It would also significantly reduce the problems caused to the town by the daily stream of buses. These include the problems caused to residential roads near the Kilrymont Building which were never built for such traffic, and the problem that traffic flows in the town centre are determined by the need to cater for the buses serving the South Street Building of Madras College.

17. Fife Council cannot rely on demographic change to solve its problems, particularly if it is granted its desire to increase its population by 5%. If, despite our representations, it were to impose on St Andrews a 16% increase (from 14,695 to 17,000 on Fife's published figures), the problems for education in the town would also increase disproportionately. The Council also needs to consider the nature of the migrant population. If, rather than attracting the retired, the aim is to draw in those in employment, including families with children, the Council cannot escape the need to address the implications for school provision.

### **ECONOMIC DEVELOPMENT**

18. On the question of economic development the Draft Structure Plan exhibits a remarkable superficiality. It attempts to build a house of cards on a single sentence in the NPF with little apparent understanding of the problems and implications of what it is proposing. The repetitive use of the jargon vocabulary is indicative of the inability to put flesh on the bones. The Structure Plan seeks to "provide the framework for the level of long-term growth for St Andrews", but lacks any understanding of the limitations on such growth. Whether one looks at numbers of tourists, traffic levels or housing completions, it is the threshold model with a capacity constraint rather than the linear model which is more likely to be the appropriate tool for extrapolating future trends in St Andrews. The appropriate mental image is not the open prairie, but pouring liquid into an almost full bottle.

19. The Draft Structure Plan fails to substantiate the notion that St Andrews can be "an economic driver for the whole of Fife". Many people have thought that the name St Andrews was enough to guarantee them instant riches, but the recent track record is more sobering. Economic success is not going to be attained by trying to turn St Andrews into a neatly-packaged stereotypical "world class destination". Indeed preconditions for success are whole hearted measures to retain the "green bowl" setting of the town, and better public transport, including a rail link, in order to reduce the negative effects of both the relative inaccessibility of the town and the impact of cars upon it. Attempts to increase the numbers of tourists arriving by car will prove self-defeating.

### **Proposal PE1 : Proposed and Existing Strategic Employment Land.**

20. **The Community Council objects to those parts of Proposal PE1 that pertain to St Andrews.** Any proposal for 16 to 20 hectares of land in the town 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, and so 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.

## **TOWN CENTRES**

21. **We call for the deletion of the bullet point in para 3.22 which starts “St Andrews is being developed as a world-class destination”.** The phraseology is seen as offensive by many in St Andrews who regard the town as already world-class in many senses. We also note that our main problems, in terms of infrastructure and the lack of a rail link, do not rate highly amongst the priorities of those who use this ‘world-class’ jargon. The Structure Plan should not adopt the colonial-style parlance of those who wish to treat the town as a resource to be exploited without reference to its residents. We are also opposed to the notion of having new shops “focussing on tourism and visitor-related retailing”. This can only result in local people having to travel further to buy what they need. This is incompatible with a green agenda. It also betrays a disturbing lack of awareness of the problems of running a tourist-related shop in St Andrews over the winter months.

## **HOUSING**

22. In our detailed discussion of housing below, our duty as a Community Council is to address Schedule H1 of the Structure Plan, which gives housing land requirements for the newly-defined St Andrews and East Fife Local Plan Area. Whilst we recognise that most of this area is the responsibility of other community councils, we have little choice but to indicate the consequences of our arguments for the Cupar HMA as well as the St Andrews one, since it is the overall figure for the Local Plan Area that is given in the Structure Plan, and obviously it is of considerable importance to St Andrews.

### **Calculation of the Housing Land Requirement**

#### **Population projections**

23. The RoS fails to provide any precise quantitative justification for Fife Council’s desired population increase for Fife over and above the figure resulting from their extrapolation of the GROS predictions. The reference in RoS Para. 5.245 to a “target annual population growth of 5%” should presumably have the word “annual” replaced by “total”. Even making this correction, the decision to go for a 5% increase over the Plan period appears entirely arbitrary. Adopting the same “back of the envelope” approach and noting that Fife’s extrapolation of the GROS predictions implies a 1.7% population increase over the Plan period, we do not see how a target increase of more than 3% could be consistent with the national interest and the need to provide a fair deal for other local authorities. A 3% increase implies a population in 2026 of approximately 363,000, which, in the terms of RoS Fig 5.44 means an “Extra population above projections” of 5,000, and thus an “Extra household requirement” of 2,500

#### **Household projections**

24. Correspondence from GROS tells us that they have not produced sub-national household projections past 2018. We therefore assume that the footnote to Fig. 5.46 is incorrect, and that the average household sizes for 2021 and 2026 shown in that figure have been generated by Fife Council. The data for these latter time-points appear to have been produced by linear or near-linear extrapolation. The accumulated uncertainties in such projections are such as to render them essentially worthless. We do not see that any better projection for 2026 can be made than the 2016 projection of 2.02 as the mean size.

### Household change

25. RoS Para 5.248 indicates that the household change column of RoS Fig. 5.47 results from natural change, and presumably reflects the net effect of reducing population size shown in RoS Fig. 5.43 counterbalanced by the effect of the reduction in household size. No justification is given for the disaggregation of the total household change figure of 16,122 shown in RoS Fig. 5.47, yet the differences between the different HMAs are quite astonishing, most notably between the two parts of the Dunfermline HMA. Given the apparent absence of any arguments to the contrary, we would argue that overall increase of 10.3% in the number of households should be applied uniformly across the HMAs, giving a household change figure of 1,934 rather than 2,295 for the St Andrews HMA, and 1,129 rather than 1,289 for the Cupar HMA.

### Vacancies

26. The RoS indicates (Para 5.252) that “It is considered that the vacancy rate across Fife will not change significantly over the Plan period” from the observed rate of 3% in the period 1991-2001. This does not appear consistent with the description of the demolition programme in RoS para. 5.251, which, not surprisingly, explains that this is “clearance of hard-to-let stock”. Particularly if the number of demolitions is to increase (which is unclear from the data provided), one would expect the demolition programme to produce some overall reduction in the vacancy rate across Fife. More significantly, as Figure 5.48 shows that no demolitions are planned for the St Andrews and Cupar HMAs in the period 2007-09, 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. Unless Fife Council can provide more accurate data, we would propose a 2% vacancy rate for the St Andrews and Cupar HMAs.

27. The effects of the changes that we propose on the calculation of the housing land requirement are shown in the following table:-

HMA	Household change	Additional migration	Demolitions	Vacancies	Additional housing need	Additional demand allowance	Requirement
Cupar	1129	400	20	34	1583	158	1741
St Andrews	1934	600	20	58	2612	261	2873

### Additional population growth

28. Ros Para 5.255 indicates that the 6,000 extra households shown in RoS Fig. 5.51 result from Fife Council’s aspiration to increase the population of Fife to “some 12,000 over and above the GRO projection”. As indicated below RoS Fig 5.43, however, the population projection of 358,000 results from a Fife Council extrapolation, and should not therefore be attributed to GRO. As we have indicated above, we regard a target population of 5,000 above Fife’s extrapolation of the GROS projection as more appropriate. In the table below we followed Fife Council in assigning 1/12 of the resulting 2,500 households to each of the St Andrews and Cupar HMAs.

HMA	Requirement	Extra households	New Housing requirement	Requirement per 5 years
Cupar	1741	208	1949	487
St Andrews	2873	208	3081	770

29. The need for rounding in RoS Fig. 5.51 is unclear to us. In the case of the St Andrews HMA, the rounding boosts the housing requirement by more than 5%. There would appear to be little justification for this level of inaccuracy, particularly as latter parts of the calculation (see Fig. 5.58) are conducted to the exact unit.

### **Housing Land Requirement**

30. The housing land requirements that we have calculated imply a total of 5,130 units for the St Andrews and East Fife Local Plan Area over the Plan period. **We therefore object to the proposed housing land requirement for the St Andrews and East Fife Local Plan Area for each of the four periods specified in Schedule H1.**

31. Whilst the figure that we have calculated is significantly lower than the 6,400 units given in Schedule H1, the comparison with the corresponding Schedule in the 2002 Structure Plan is also of interest. An even sub-division of our figure implies a requirement over five years of 1,283 units. This should be compared with a total of 1,030 units for the period 2006-2011 given in the 2002 Plan for the significantly larger East Fife area used in that Plan. So even our figure represents an increase in excess of 25% of what was planned only 3 years ago. The huge increase to 1,600 units proposed by Fife Council illustrates that the whole exercise is about policy and not science, for it is due far more to policy change than demographic surprises. If a projection looking ahead just 9 years is to be subject to a revision of over 50% after just three years, it is very hard to take seriously Fife Council's projections for a 20 year period.

### **A sounder statistical approach**

32. In fact the comparison with the 2002 Plan's requirements for the period 2006-2011 highlights a major conceptual weakness in Fife Council's approach. We believe that any statistician would deplore the manner in which the methodology allows relatively reliable data for the period to 2016 to be significantly biased by the much more speculative projections beyond that point. Policy H1 indicates that the housing land requirement for the five year periods beyond 2011 will be subject to review. Given that position, although provisional figures are required up to 2026 for long-term planning, this does not preclude basing the requirements for the periods to 2016 on the best data available.

## **Calculation of the Housing Shortfall**

### **Windfall Site Contribution**

33. The contribution from windfall sites is discussed in RoS Para 5.265 and the assertion is made that "the short term trend is downwards". This appears to have little statistical validity in the context of a Structure Plan for a 20 year period. Whilst there has manifestly been a decrease over the last three years, the data over the five years in RoS Fig. 5.55 exhibit no statistically significant trend.

34. From a windfall contribution of 3200 units for Fife, RoS Fig. 5.56 attributes 400 and 200 units respectively to the St Andrews and Cupar HMAs. As RoS para 5.266 indicates, however, the contribution from windfall sites that is employed is under a half of the recently observed level. Just a single reason is offered, namely the possibility of including the same sites in both the windfall and urban capacity figures. Use of the recent yearly average of 431 units would imply a contribution of 8,620 units from windfall sites over the 20 year period. If the Local Plan is 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. We thus propose a projection of 80% of the above 8,620 units be made for the 20 year period. A disaggregation corresponding to that made by Fife Council would then attribute 862 and 431 units respectively to the St Andrews and Cupar HMAs. We would therefore propose that in RoS Fig. 5.58 the urban capacity contribution for these HMAs (currently set at 27 and 42 units respectively) be reduced to zero, but the windfall sites contributions be increased to 862 and 431 respectively. RoS Para. 5.265 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. Moreover the use of a nil contribution under urban



capacity clearly removes all possibility of double counting, thus addressing the concern indicated by Fife Council.

**Small sites**

35. The arithmetic of RoS Fig. 5.57 could at best be described as opaque, with two startling discontinuities in the calculation. If the column headed “Average” is the mean of contributions of 114 in 2002 and 184 in 2003 then it should read 149 rather than 206. Moreover, after calculating a projected 5 year output of 825, the reason given in the text is completely inadequate for using an assumed 5 year output as low as 250 in subsequent calculations. We would agree with RoS para 5.267 that “the vast majority of approvals will result in development”, and therefore regard an assumed 80% completion rate as the minimum that could be realistic. No reason is offered for any possible decrease in the completion rate, and we do not expect one, so assuming just 30 units and 20 units per annum for the St Andrews and Cupar HMAs respectively looks completely unrealistic.

36. As with windfall sites, the goal should be to produce a realistic estimate. We will make the conservative assumption that the data are correct and 149 is therefore the correct average. Use of an 80% completion rate implies a 5 year output of 596 units for the two HMAs combined, and we have disaggregated the implied total of 2,384 units over the 20 year period in the proportions used by Fife Council.

**The housing allocation for St Andrews**

37. The effects of the changes that we propose on the calculation of the housing shortfall are shown in the following table. We offer this as a provisional statement of our position, which is inevitably dependent on the validity of the inferences that we have made at points where the RoS is unclear or inconsistent. If Fife Council is able to provide clarification of any of the points in question, we would be happy to consider whether modifications to our analysis would be appropriate. What is, however, already clearly evident from our analysis is that the shortfall figures are highly dependent on the large number of subjective assumptions that have been made.

HMA	Requirement	Contributing supply	Urban capacity	Windfall	Small sites	Shortfall
Cupar	1949	129	0	431	954	435
St Andrews	3081	29	0	862	1430	760

**It follows that we object to the proposed housing allocation for St Andrews specified in Schedule H3.**

**Policy H3 : Meeting the Housing Land Requirement**

38. 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 – unless this is some form of special needs housing for those who cannot sleep in the same bedroom on two consecutive nights.

39. We will only see progress in this regard if Policy H3 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 this Structure Plan offers little prospect for change.

40. 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 H5 : Affordable Housing**

41. The Community Council does not believe that this policy is adequate to meet the exceptional circumstances that pertain in St Andrews. The proposed use of section 75 agreements offers little reassurance that we will not simply 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. If Fife Council’s proposal of 45% affordable housing on sites over 10 units in the St Andrews HMA were achievable, and affordable meant affordable in perpetuity, we could see arguments for such an approach. If, however, as the Scottish Executive has implied, a figure of 25% affordable is more realistic, then we end up getting three houses for which we have little need for every one house of the type that is sought. In terms of the dilemma identified in Conclusion 7 of the Strategic Study, 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.

42. 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.

43. In so far as developer-funded affordable housing can contribute to the problem, we would wish to see included in Policy H5 the stipulation, in Para 3.16 of the Supplementary Guidance on Affordable Housing, that the affordable component should be completed within a similar timescale to the non-affordable. Another possibility that merits consideration is that there may be exceptional circumstances in which it might be appropriate to replace the developer’s contribution of affordable housing by some other benefit to the community (e.g a hospital site).

### **Policy H6 : Non-Residential Development**

44. The Community Council is supportive of the intentions of this policy, but notes that, whilst Policy H5 appeared weak on affordability in perpetuity, this policy is completely silent on the question.

### **Policy H7 : Exceeding the Housing Land Requirement**

45. Making comparison with the formulation of this policy which appeared in the 2002 Fife Structure Plan, **we object to the weakening of the wording by the omission of the initial sentence “Proposals which would result in the Housing Land Requirement being exceeded will not normally be supported.”**

### **Policy H8 : Density**

46. **We object to this policy which, however well-intentioned, needs a counter-balancing clause to give adequate recognition to the need to ensure housing developments are compatible with their surroundings.** The requirement for high housing densities in town centres will encourage inappropriately tall buildings. The St Andrews Conservation Area has been marred in recent years by a number of developments of this type.

## **TRANSPORTATION**

### **Policy T1: Transport and Development.**

47. The version of this policy in the 2002 Fife Structure Plan required developers to “provide adequate cycle facilities where appropriate”. **We object to the omission of this clause.** We would also query the omission of the clause relating to air pollution.

### **Policy T4: Safeguarding of Existing and Potential Transport Routes.**

48. The clause of this policy safeguarding the disused railway network is well-intentioned and constitutes a sensible proposal for many parts of Fife, but this is not so in the context of St Andrews’ former link with the East Coast Main Line. It has been generally agreed by those campaigning to reinstate the rail link and by the consultants who carried out the Fife and South Tayside Rail Study in 1999 that re-use of the former route from Leuchars to St Andrews makes little sense, not least because the crossing in Guardbridge of the main road from St Andrews to Dundee would be too problematic with today’s traffic levels. It can also be safely assumed that the St Andrews Links Trust would be strongly opposed to reinstatement of a railway across the links. As a path which can be used by cyclists and pedestrians has been constructed alongside the northern side of the A91, it seems highly implausible that Fife Council would wish to use the former railway track-bed for any other transportation purpose. The effect of policy T4 would therefore be to sterilise this strip of land for no purpose.

49. A more appropriate version of this policy would include a provision for Local Plans to identify any parts of the disused rail network to which Policy T4 would not apply, subject to a firm requirement that an appropriate alternative alignment be designated and safeguarded instead.

50. In a Plan that seeks to give a vision for 20 years and has as one of its transportation policy objectives “Encouraging the use of more sustainable modes of transport”, some more imagination needs to be given to the promotion of cycling than Policy T4 currently contains. Safeguarding the Kingdom of Fife cycle route is a very small first step, particularly bearing in mind that much of the route consists of minor roads, some of which also carry fast vehicular traffic. Even if funds are not currently available for off-road cycle paths, Policy T4 should also require Local Plans to identify and safeguard a connected network of off-road routes which can be developed when finance permits.

### **Proposal PT2 : Transport Proposals**

51. **We object to the clause in this proposal which reads “further consideration of transport link options to the rail network to St Andrews, through the review of 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 weakness of this proposal. 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.

52. Fife Council appears to be making a dismal attempt to turn the clock back to the situation prior to the 2002 Structure Plan. Amongst the many documents in which the Community Council has emphasised the importance of keeping the reinstatement option alive are our submissions in 2000 on the Draft 2002 Structure Plan and on the 2020 Tourism and Transport Vision for St Andrews. Our argument on the need to safeguard the route of the rail link in the 2002 Structure Plan always fell on deaf ears as far as Fife Council was concerned. Accordingly in March 2001 the question of the rail link formed one of the objections to the Finalised Structure Plan that we put to the Scottish Ministers. The wording in the 2002 Structure Plan fell short of what we would have liked, but nevertheless appeared to reflect a positive intervention on their part. That 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.

53. 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 the town, and providing a means for more tourists, golfers and academic visitors to access the town more easily without causing continual gridlock on our roads. The repetition in the Draft Structure Plan of the intention to turn St Andrews into a “world-class destination” overlooks the practicalities of access. It will not be a destination at all if people are unable to get there – as is almost the case already during holiday weekends in the summer.

54. Such is the negative attitude in Fife Council Transportation Service to the rail link that there is a failure to appreciate that the contribution that the rail link can make is not restricted to the town’s transportation problems. The need to conserve the landscape setting of St Andrews means, as we have stressed repeatedly in this submission, that little suitable housing land now remains in St Andrews, but 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 some restrictions on the location and nature of associated developments would be appropriate, 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.

55. Proposal PT2, which starts with the words “Transport proposals are listed below . . .” looks notably imprecise when compared to the formulation in the 2002 Structure Plan. This Community Council therefore calls on Fife Council to amend Proposal PT2 to include the words:-

**“Land for the following routes and facilities will be identified in Local Plans and safeguarded from prejudicial development**

**\* a rail link from the East Coast Main Line to a new station in St Andrews, following an alignment on the southern side of the A91.”**

56. The need to safeguard this route, including both southern and northern chords to the main line, is urgent. To maximise the contribution that the rail link can make, the track needs to reach a

position close to the centre of St Andrews (i.e. the old station site). Development pressures near St Andrews are such that a failure to act at this time is likely to render this impossible. A Council that is supposed to believe in sustainable transport should be ashamed of its lack of action on the St Andrews rail link. We are not asking Fife Council to finance it, but merely to draw an appropriate line on a map and safeguard it from development.

### **Development on the Undeveloped Coast**

57. **This Community Council objects to the omission of Policy N7 of the 2002 Fife Structure Plan.** Fife Council's apparent loss of interest in protecting the coastal environment is disappointing. The policy objectives following Para. 4.24 include "Safeguarding and improving the character and distinctiveness of Fife's landscapes and coastline", but it is hard to see how this can be achieved by deleting relevant policies.

### **Built Heritage**

58. **This Community Council wishes to see revised versions of Policies B1 and B2 of the 2002 Fife Structure Plan.** We would wish to see an explicit statement that developments that detract from the character of Conservation Areas or adversely affect the character or settings of listed buildings will not be supported. 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.

### **Open space**

59. We also wish to see explicit recognition of the beneficial role of green spaces within the urban environment. A townscape which is an undivided concrete jungle is not a vision for 2026 that Fife should tolerate.

### **Sports grounds**

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

### **Archaeological Protection**

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

### **Flooding and Coastal Erosion**

62. 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.

### **Policy C2 : Information and Communication Technology**

63. Although para 5.5 focuses on Broadband, Policy C2 can presumably be read as applying to mobile phone technology also. Guidance is required on the siting of mobile phone masts. Some may regard it as ironic that the immediately following policy is on healthcare facilities.

### **Editorial improvements**

64. The organisation of the contents of the Draft Structure Plan makes it less readily accessible than the 2002 Fife Structure Plan. It was easy in the latter to identify the desired section from the contents page, whereas in the new document it is far harder to locate the topic of interest. The new reader is unclear whether housing, for instance, will come under "Fife-wide policies and proposals"

or “Key strategic policies and proposals”. We have frequently resorted to electronic searching, but that should not be necessary. As there is only a single university in Fife, we would have hoped that a formal document of this nature might use its correct name, which is the University of St Andrews.

Yours sincerely,

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Planning Convenor