



Royal Burgh of St. Andrews Community Council

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3 December 2002

Dear Mr Cooke,

Proposed development - Western St Andrews Response to the Scoping Brief for the EIA

I Introduction

A new approach

1. This is the first time that this Council has been asked to comment on a Scoping Brief for an Environmental Impact Assessment (EIA), and so we have needed to examine the procedural documentation with some care. We have also benefitted from advice from a number of sources. It has become clear to us that the approach implied by the European legislation involves a radically different approach to those which have previously prevailed in local authority planning matters.

The EIA as science

2. The key change is that the EIA should be a scientific document. Referring to the Environmental Statement (ES) that results from the EIA, the letter from the Planning Division of the SEDD to all Heads of Scottish Planning Authorities (ref PGD/5/12) says in para 19.1 "The planning authority should be prepared to challenge the findings of the ES if it believes they are not adequately supported by scientific evidence."

The nature of scientific evidence

3. A conclusion can only be regarded as objective and supported by scientific evidence if the reasoning which justifies it is fully documented. In the case of quantitative results, the values of the raw data or other input variables should be fully specified so that it is possible for the reader of the ES to reproduce the calculations and reach the same answer. Results not substantiated in this way should be viewed as opinions.
4. It is important not to underestimate the extent to which the approach envisaged for the EIA differs from traditional practice in local authority planning. Thinking back over 16 years on the Planning Committee of the Community Council, I find it very hard to think of any examples of consultants' reports, submitted as supporting documentation for planning applications, which did not substantively endorse the conclusions which the client wished to hear. No doubt the nature of market economics makes it naive to expect otherwise. To concoct the argument to justify pre-determined conclusions may be sound business practice on the part of the various firms of

consultants, but such practice has no claim to be labelled "scientific". PAN 58 (para. 66) says that in an ES, "Conclusions should be drawn from the data, rather than tailored to favour the proposal." Such an elementary proposition would cause hilarity in scientific circles. The fact that it is thought necessary to say it indicates that at central government level there is some awareness of the twilight zone of consultants' reports in local government.

The evaluation of evidence

5. In assessing the EIA, Fife Council will also need to sharpen up its methods of evaluation. For instance, the Council's planning officials have generally been prepared to accept assertions on traffic matters if a transportation official thought the assertions looked OK. The test of whether an assertion is "supported by scientific evidence" needs to be much more rigorous than that. In Western Europe, the acceptance of something as fact because someone says it is so has not been regarded as reputable scientific methodology since the Middle Ages. Scientific validity requires a transparent procedure in which all inputs are exposed for scrutiny and methodology is fully specified so that it can be subject to replication by others with suitable expertise.

The desirability of agreement on methodology

6. PAN 58 (para. 41) says that one of the purposes of scoping is "to provide a means to discuss methods of impact assessment and reach agreement on the most appropriate." If what is to be undertaken is a scientific exercise, then the goal of agreement amongst all the parties involved on appropriate methodology is not only desirable, but should also be feasible. Unfortunately it has to be said that consideration of the Scoping Brief (SB) before us makes agreement look a very remote prospect indeed. For it in no way reflects the notion of the objectivity of the "new politics" envisaged by the EIA procedure. It is the usual wearisome web of half-truths, indistinguishable in flavour from the pseudo-science to which we have grown accustomed over the years. It is, for instance, hard to understand what they hope to gain by the implication in the Foreword that the Strategic Study could be quoted selectively to justify further development. This is roughly comparable to saying that a case for waging an aggressive nuclear war could be based on the Sermon on the Mount.

Major omissions from the Scoping Brief

7. More fundamentally, as others have already noted, the developers' Scoping Brief fails to provide sufficient information for Fife Council to be able to provide a Scoping Opinion. The EU's Guidance on EIA Scoping (Part B2) says that "Whichever organisation is undertaking scoping, it is important that the people involved have sufficient information about the project and the area which will be affected to allow them to identify potential impacts and possible alternatives". Clearly sufficient information implies, as a minimum, details of what buildings are to be constructed, their function, their size and their location. In the case of institutional buildings, the number of users of the buildings, the catchment areas from which they are drawn, and their likely modes of transport must also be specified. For recreational facilities, the scoping brief needs to include a full specification of the size and catchment area of the target clientele.

The need for a revised Scoping Brief

8. We would therefore wish this letter to be regarded as an interim position of the Community Council. PAN 58 (Para 25) notes that the EIA process "rarely proceeds in a simple linear fashion", and we assume that another iteration of the Scoping Brief stage will be needed before Fife Council is able to give its Scoping Opinion. This Council may wish to contribute further comments on the scope of the EIA when further details of the developers' intentions emerge.

II General Requirements

Referencing

9. The EU's Guidance on EIA, EIS Review, Part B3 says that a good EIS (Environmental Impact Statement) "references all information sources used." More precisely, we would ask Fife Council to require that where an argument in the EIS relies on another document, a full reference including the page number should be given. All appropriate steps should be taken to ensure that the interested reader can verify the accuracy of all assertions made. Short citations that would not infringe copyright rules should be reproduced in the main text or in an appendix. Other supporting documentation should be made available to the public at the Local Office. (The situation that arose at a recent Public Inquiry, where the Community Council needed to acquire a document with a retail price of £600 in order to verify a key statistic, is not acceptable.) Exceptions could be made where documents are *reliably* available on the World Wide Web (and will continue to be so until the application is determined), as may be true, for instance, of governmental planning documents. In such cases a *precise* web reference would suffice.

Computer output

10. In the typical consultant's report on planning matters, science has been used as much to obfuscate as to enlighten. Computers have proved an ideal tool as far too many people regard their output as necessarily correct, and many more can be persuaded that the matter is entirely beyond their comprehension. Consultants must therefore not be allowed to hide behind computer programs.
11. Where results rely on computer analysis, appropriate information should be provided to allow the reader to acquire the software and replicate the results. The name, and version number (if any) of the package used should be stated. There should be a full specification of all the input data and of the chosen method of analysis indicating variants selected at any points at which discretion has had to be exercised. Where simulations using random data are employed, the distributional assumptions made should be stated.

Forecasting

12. The Environmental Impact Assessment (Scotland) Regulations 1999 (ANNEX C Part I , para. 4) require a "description by the applicant of the forecasting methods used to assess the effects on the environment". Given the long lead times associated with the developers' proposals, this is particularly pertinent in the current case. The extent of the historical data provided should also be commensurate with the length of the lead time for which forecasts are offered. The uncertainties involved are such that point predictions alone will not be satisfactory. Predictions intervals will be needed in order to quantify the uncertainties. The methodology adopted should be fully recorded.

Interventionist Processes

13. Where the variable being forecast is neither natural nor uncontrollable, but will be influenced, for instance, by decisions of government, local government or government agencies, a forecast of a purely extrapolative nature is clearly insufficient. Forecasts should still be provided, in the manner indicated in the previous paragraph, but there should also be an accompanying statement from the controlling body that the forecast is at least consistent with their current policy intentions.

Survey data

14. Survey data should be accompanied by detailed information on the dates and times of sampling, the sampling scheme and the survey protocol. The submitted documentation should include the

raw data obtained, and, in the case of opinion surveys, the questionnaire used. Methods of analysis should be indicated. The reporting of percentages without indication of the absolute numbers involved is not acceptable practice.

III The reasons for the proposed development

The need to justify the proposal

15. The EU's Guidance on EIA, EIS Review, includes a checklist in which question 2.4 asks "Are the main reasons for choice of the proposed Project explained . . . ? This is particularly pertinent for the developers' proposal. The justification for such a huge expansion of the town must be fully argued, and reasons given why the existing planning framework for the town, derived over the last decade, is in their eyes inadequate.

Housing

16. The University has recently been quoted in the press as saying, rather condescendingly, that the strategic planning for St Andrews has been done on an ad hoc basis. This appears to be an assertion on the part of one of the developers that the methodology used to substantiate the housing chapter of the Structure Plan is lightweight. In the face of the major challenge to the calculated housing land requirements implicit in the development proposal, the Scoping Opinion should therefore require that the "reasons for choice of the proposed Project" should include a re-working of the Structure Plan's housing calculations. The methodology employed should be no less thorough than that on which the Structure Plan is based, but could also incorporate any improvements or elaborations which the developers judge appropriate.

Long-term forecasts

17. The methodology used to forecast the future housing need for the town will need to be sufficiently robust to cope with the long lead times envisaged by the developers. The planning horizon is considerably greater than that used for the Structure Plan, and the approach will require modification to allow for the greater uncertainties. In particular, historic data on windfall and small sites should be presented, and the methods used for extrapolation expounded.

IV Traffic

18. A Traffic Impact Assessment (TIA) should be carried out in accordance with the guidelines of the Institution of Highway and Transportation (IHT). Particular aspects that we would wish to emphasise are as indicated in paras. 19 to 29.

Scoping Study

19. "Prior to the commencement of the production of a full TIA, a scoping study should be undertaken to enable the developer and the highway authority to agree on the key aspects which the TIA should address. The scoping study should set out details of the data to be collected, the area of analysis, the methodology to be adopted and the years of assessment" (IHT Guidelines, para. 2.2.1)
20. Section 10 of the Scoping Brief has been written as a draft TIA rather than as a scoping study. What is needed at this stage is a clear statement of the proposed programme of work for the traffic consultants, which should be circulated to all the EIA consultees for comment. It is not plausible that a TIA scoping study has already been agreed with Fife Council, since, as noted in para 7 above, the proposed development is currently too ill-defined to make this possible.

Park-and-ride (SB 10.1.1.6)

21. Usage statistics should be provided so that the significance of its contribution can be evaluated.

Traffic Growth

22. Vague statements about "historic" traffic growth are not adequate. Supporting data, with a full description of its mode of collection, should be provided.

Trip Generation

23. Again the lack of definition of the proposal renders this part of the draft TIA meaningless. The style of SB 10.4.7 is also a good illustration of the "accept it's true because we say it's true" style of "science" alluded to in para 5 above. Transparent reporting, of the style advised by the EU, would provide the reader with appreciably more detail. The exposition should clarify the use made of the TRICS database, using headings similar to those of para 3.4.16 of the IHT Guidelines, and specifying in particular, for each of the land uses, the sites used for comparability purposes.

Trip Distribution

24. The naive application of a gravity model is very poor as a scientific approach. For the housing element of the application, there is no need to speculate on the behaviour of a virtual community sited approximately one and a half miles west of the town centre of St Andrews. A carefully conducted survey of the existing community of Bogward will provide far better information than the speculation in this draft TIA.

Modal choice

25. Again better information should be obtained from surveying existing residents of the town. In particular the non-quantitative information on walking and cycling (SB 10.1.2 and 10.1.3) is inadequate.

Principles of the Transportation Strategy

26. The promotion of walking, cycling and public transport are listed as principles of the strategy for the site. Fife Council has had similar goals since its inception. Appropriate historic data on how far this policy has changed the habits of the residents of the town should be provided, together with forecasts of future trends.

Travel Plans

27. Again a scientific approach requires the provision of appropriate data to distinguish between aspirations and actual realities.

Paramics Model

28. The general considerations on computer output, given in para.10 above, are particularly pertinent here. The reader should be provided with all the necessary information to replicate the results of any simulations that are quoted in the EIA.

Evaluation

29. Fife Council's Scoping Opinion should include a statement on the way in which it intends to evaluate the TIA. It is evident from the European documentation that some countries require evaluation of EIAs by independent bodies. The Scoping Brief reveals the close co-operation between the traffic consultants and Fife Council, particularly in the provision of data and in the use of the Paramics model. Even this draft TIA is clearly written to maximise its appeal to a

gallery that is assumed to consist of Fife's transportation officials. This is not objective science. It is not acceptable to have people assessing the relevance and pertinence of information which they have themselves provided.

V Health Facilities

30. Before Fife Council can offer its Scoping Opinion, a detailed specification is required of exactly what health facilities are proposed, and the catchment area for which they would cater. PAN 58 (para. 69) says "It has always been good practice for the ES to report on the alternatives considered by the applicant and it is a requirement of the 1999 Regulations." This is certainly needed in the case of the health facilities. A full comparison is needed of the merits of this site in comparison to others in this area, for whatever purposes may be envisaged. If long-range forecasts of health needs are being made, appropriate demographic time series will also need to be extrapolated. The SB (Para. 10.5.3) envisages discussions with Fife Primary Care NHS Trust. Endorsement of the analysis by the health authorities will obviously be needed.

VI Education

31. Similar remarks are appropriate with respect to any proposed facilities for (non-university) educational facilities. A prerequisite for the Scoping Opinion is full specification of the intended facility and its catchment area. The ES must include consideration of all alternative ways in which the facilities might appropriately be offered. If public sector schooling is envisaged, the proposals would be meaningless without endorsement of the analysis by Fife Council as education authority.

VII University

Planning horizons

32. It is hard to comment at this stage on what the EIA should cover with respect to the University developments since those developments remain almost completely undefined. There has been mention in the press of a 100 year planning horizon. If Fife Council regards this as feasible, it will need, in its Scoping Opinion, to specify what it would regard as "scientific evidence" when forecasting for lead times of this length. There are some deterministic processes for which such forecasting is feasible, but, whenever there is a significant stochastic element, the accumulated uncertainties are liable to render the task hopeless. Accordingly it may be more appropriate for Fife Council to specify some longest lead time (e.g. 20 years) beyond which it deems there is no possibility of conforming to the necessary legislative requirements.

Omissions from Scoping Brief

33. The impact of new University buildings cannot be assessed without specification of their intended function. Information needs to be given on whether they are for teaching, research, administration, accommodation, the commercial exploitation of research, etc. Buildings for teaching purposes or student accommodation would imply a need for projections of student numbers, disaggregated both by subject area and by funding source. To the extent to which such projections depend on policy decisions by SHEFC or other funding sources, external endorsement of their feasibility would appear appropriate.

Occupancy statistics

34. If a scientific case for expansion is to be made, alternatives to the use of greenfield sites should be fully discussed, including any approaches to organisations owning under-utilised buildings

within the envelope of existing University development. It should be shown that the proposals do not constitute speculative or unnecessary building. This should be done using historic data on occupancy rates of University property, again with suitable disaggregation by function.

VIII Hi-Tech Research Facilities

35. Again the inadequacy of the specification of these facilities in the Scoping Brief makes it difficult to make informed comment at this stage. As with the proposed educational facilities, a prerequisite for the Scoping Opinion is full specification of the intended facility. The ES must include an investigation of alternative possible sites. Historic data on uptake rates for industrial, commercial and research sites in St Andrews will be needed in the ES.

IX Selection of consultants

36. The EU's Guidance on EIA Scoping (Part B4.2) indicates that one of the matters which scoping may address is "the membership and management of the EIA Team". This Community Council would strongly urge that, if the EIA is to be seen as objective science, the Scoping Opinion should advise that all the consultants employed on the work should be such that the local community can reasonably be expected to have some trust in their basic professional competence.
37. Following their work three years ago on a TIA for Fife Council in connection with major proposed golfing developments, this Community Council has no such trust in the work of Colin Buchanan and Partners. Our concerns about some of the larger blunders in their work were reported in the press at the time. The earliest warning signs came with reports from members of the public of the casual approach to traffic counts taken by some enumerators. This included enumerators simply being absent from their posts during the sampling period. Our worst fears were confirmed when Fife Council finally released the sampling data late on the afternoon before the crucial committee meeting on Kingask. The discrepancies in the data, including a massive disparity of 3000 vehicles between the numbers entering and leaving Alexandra Place, meant that no reliable inferences could be made on the basis of the given data. Moreover inspection of the 150 pages of spreadsheets showed that there were also many data entry errors occurring in places where there would have been no possibility of error had the work been carried out by someone with even a basic competence in the use of spreadsheets. The shambolic nature of this TIA was of no interest to Fife Council. As usual the client had been given the desired conclusion: it did not matter that it was built on sand.
38. The errors in this TIA were not of kind that anyone might make on a bad day. They showed that the company lacked suitable standard procedures for data entry and data validation. Despite the publicity given to our objections, the town has received no word of apology from the company for this disgraceful performance. We regretfully conclude that, by appalling workmanship, this company has already betrayed the interests of St Andrews. It must not be given the opportunity to do so again.

X Presentation of the Environmental Statement.

Main Text

39. PAN 58 (para. 74) indicates that the Main Text ES should not generally exceed 150 pages, though para 73 envisages the need for additional appendices. There is also recognition that the length will depend on the complexity of the project. In the present case we have a huge project

with development supposedly spread over the next century. Clearly this is at the extreme end of the complex part of the range. We, for our part, would stress again, that whilst conciseness is clearly a virtue, it must not be at the expense of providing full justifications. Length constraints must not be used as an excuse for poor science.

Non-Technical Summary

40. Notwithstanding our emphasis on full technical details being provided, we also note from PAN 58 (para 78) the need for the ES to include a Non-Technical Summary. Clearly this is will be extremely useful in ensuring that the ES is widely and critically examined.

XI Feedback

41. Finally we would draw your attention to Para B5.3 of the EU's Guidance on EIA Scoping which says "Whichever method of consultation is employed it is important to . . . ensure that the views expressed are taken into account, and are seen to be taken into account, in planning the environmental studies and preparing the EIS, and that an explanation is provided if recommendations are not followed."

Yours sincerely,

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