



Royal Burgh of St. Andrews Community Council

TAYplan SDPA,
Proposed Plan Representations,
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St Andrews
KY16 8XL

31 July 2011

Dear Sir/Madam,

TAYplan : Proposed Strategic Development Plan 2012 – 2032

1. I write on behalf of the Community Council to object to various aspects of the proposed TAYplan. At one stage we certainly hoped that a new planning authority would seize the opportunity for a new approach to strategic planning which was more closely aligned to public sentiment. Sadly the approach of TAYplan to St Andrews is no better than that of the recent Fife Structure Plan which many felt set new records for the disregard of local opinion. Whilst we have encouraged fellow residents of the town to respond to this consultation, it will be unsurprising if the widespread sense of anger is replaced by the increasing sense of futility in responding to planning consultations. There are so many indications that planning officials have already decided that they will not budge on substantive questions and democratic controls appear so weak. The views of the major developer organisations that operate in the town are heeded, but there has been serial neglect for years of residents' views.
2. At various places in the text, TAYplan pays lip-service to the effects of the recession and is prepared to acknowledge that its effects may last until 2018-19. There is little recognition, however, that the fall-out of the recession, such as the recent decision to close RAF Leuchars, may have more long-lasting effects. The main calculations of housing numbers appear to have been carried out in late 2009, and the broad parameters set by the Plan seem to differ little from those that would have been chosen before the recession. Whilst officials can certainly claim that the new Scottish Planning Policy encourages the removal of constraints to development, TAYplan does so with wild abandon – to the point where even developers may feel they are being asked to operate under too anarchic a regime. Regrettably there seem to be even fewer politicians with the courage to challenge the current ethos that planning is merely a hindrance to economic growth and development than there were prepared to challenge the excesses of the Murdoch press, and again a heavy price will be paid. It is therefore hard to know how best to characterise the proposed TAYplan. To the extent that it denies the recession, should it be dubbed the yesterTAYplan, or does the laxity of the regime it proposes to introduce make it NAYplan at all?
Failure to address the town's main problems
3. In self-congratulatory mode, TAYplan declares "This Plan's approach is bold and clear on shaping better quality places", but it offers nothing on the prime issues affecting the quality of St Andrews. Far from being bold, it runs away from the issue of affordable housing, with the Housing Needs and Demand Assessment declaring that affordable housing targets are non-strategic. Lacking the courage to address its own self-contradictions, it propounds in

general terms the desirability of giving priority to brownfield sites before requiring that even more of St Andrews strategic housing should go on greenfield land than was specified by the widely disliked Fife Structure Plan. Fife Council has been required since 2002 to introduce a Green Belt for the town, and TAYplan does retain that requirement, but the gradual weakening of planning controls means that even that will not be the silver bullet that might at one time have been envisaged. We commended last year the emphasis in the TAYplan Main Issues Report on reducing the carbon footprint, but TAYPlan fails to even take the basic step of safeguarding a route for the proposed rail link to the town.

Affordable housing

4. The abject failure of the planning system over the last 15 years to provide more than a minimal quantity of affordable housing in St Andrews is slowly killing the town, allowing it to sink increasingly into its caricature of a cross between a student campus and a retirement lounge for the well-to-do. The resulting distorted age distribution increases the threat that young families will become an endangered species and that we will not have seen the last of the school closures.
5. Politicians have acquiesced for far too long in a system that fails to differentiate adequately between affordable housing and market housing. In the context of St Andrews, the current system effectively serves as Robin Hood in reverse, exploiting the needs of the less well-off for the benefit of developers and the well-to-do. The need for affordable housing gets converted into a requirement for houses of unspecified type, and to maximise their profits developers largely choose to provide mainly luxury homes. Most of these will be bought by wealthy incomers from outwith the local area rather than by first-time buyers who have grown up in the area or by those currently commuting into the town.
6. Although it is far from candid about the matter, TAYplan appears to calculate the total number of new homes required in a manner that is novel for strategic plans covering St Andrews. One major input is the extent of the need for the different types of affordable housing. The supporting study claims that a minimum of 2050 homes a year is needed across the TAYplan area, with the calculations indicating that over 58% of these should be affordable. Yet, in St Andrews, the best that is being offered is 30% affordable, and we are seeing a failure to get anywhere near even that limited provision either for lack of funding or because the developers demonstrate considerable facility at side-stepping the requirement. This is worse than useless, as scarce housing land is squandered on providing housing that is not addressing the main local need.
7. It is clear that the only sensible solution to this problem is to have an affordable housing land requirement and a separate requirement for market housing. In any other sphere of life the failure to specify the desired product would be seen as barking mad. No politician would say that more vehicles for transportation are required, but fail to specify whether they meant cars or trains or planes, as one type of vehicle will not usually serve as a substitute for another. The same is true of affordable and market houses.

Calculating the Housing Land Requirement

8. We are far from impressed by the lack of clarity with which the calculation of the Housing Land Requirement is presented in the documentation. If there had been any desire to assist the reader one might have expected, for instance, some emphasis on the novelty of the approach used. Indeed it looks as though the planners have changed horses at some point in the last two years. It appears that the main determinant is no longer the household

projections produced by the General Register Office for Scotland (GROS) even though the Housing Needs and Demand Assessment (update Feb11) still declares (para. 3.27) that “The base source of these calculations is GROS’s 2006-based population and household projections.” The reader can easily be misled by the frequent references to these projections, which now appear to be used only to provide the loosest of checks. The new method does have the merit of attempting to assess directly the extent of need for affordable housing, but the disadvantage is the very large range of inputs required, rendering public scrutiny extremely difficult. Our experience suggests that turning such calculations into a private activity for unelected officials is unlikely to be a recipe for long-term success, and that government is improved by the cut and thrust of debate. The position is further aggravated by the new Scottish Planning Policy which may also be used to restrict the opportunities for challenging the proposed housing numbers.

9. It is indeed all too evident that the TAYplan officials seek to dissuade challenges to the calculation of the required number of new homes. They have even recorded on the cover of the Housing Needs and Demand Assessment the endorsement by the Scottish Government’s Centre For Housing Market Analysis that their approach is “robust and credible”, with an implicit warning that no one should have the temerity to suggest otherwise. Nevertheless there appears to be one conceptual error – a significant double counting on the need for affordable housing - that we feel compelled to raise.

Objections

In the objections that follow, referencing is relative to the text-only version of TAYplan.

OBJ 1 Page 6, Objectives, Supporting sustainable economic development and improving regional image and distinctiveness, First bullet point.

Change “Plan for an effective supply of land for housing and employment;” to “Plan for an effective supply of land for housing, particularly affordable housing, and employment;”.

Rationale

In many places the lack of affordable housing comes top of the list of the existing problems. St Andrews is clearly one such place, as even commercial developers now appear prepared to acknowledge. It is entirely appropriate to acknowledge the problem right from the outset of the plan and to highlight it on the list of objectives. As we have noted above, the lack of an appropriate injection of affordable housing is gradually undermining the social structure of St Andrews and leading to loss of facilities.

OBJ 2 Page 6, Objectives, Supporting sustainable economic development and improving regional image and distinctiveness, Second bullet point.

Change “Strengthen the critical mass of Dundee so that with Perth and other principal settlements they serve as major economic drivers supporting a more competitive, strong and stable economy for the region;” to “Strengthen the critical mass of Dundee so that with Perth and other principal settlements they serve as economic drivers supporting a more competitive, strong and stable economy for the region;”.

Rationale

This bullet point applies in particular to Tier 3 principal settlements. Policy 1 indicates that these only play a “more modest role in the regional economy”, so it is inconsistent to describe them as major economic drivers.

OBJ 3 Page 6, Objectives, Supporting sustainable economic development and improving regional image and distinctiveness, Third bullet point.

Change “Promote and enhance places and landscapes as economic drivers and tourist destinations;” to “Promote and enhance appropriate places and landscapes as economic drivers and tourist destinations”.

Rationale

It is not possible to simultaneously safeguard a place and exploit it as an economic driver. The objective cannot therefore apply to all places and must exclude those (habitats, green spaces, parts of the coastline, etc.) safeguarded under Policy 3.

OBJ 4 Page 6, Objectives, Supporting sustainable economic development and improving regional image and distinctiveness, Fourth bullet point.

Change “commercialisation of the higher education and research sector” to “commercial spin-offs from the higher education and research sector”.

Rationale

Commercialising higher education means running higher education for profit, usually private profit – a concept that very few will support. Presumably what is intended is the commercial exploitation of appropriate types of research. In the University of St Andrews that will only be a part of the research of the Faculty of Science (much of the research being pure science), and very little of the research conducted in the Faculty of Arts.

OBJ 5 Page 6, Objectives, Enhancing the quality of places through better development outcomes, Fourth bullet point.

Change “Continue to protect the important landscape settings and historic cores of St. Andrews and Perth with green belts” to “Protect the important landscape settings and historic cores of St. Andrews and Perth with green belts”.

Rationale

It is not possible to continue to protect with a Green Belt that which has not hitherto been protected by a Green Belt. Although, since 2002, the Fife Structure Plan has required that St Andrews be protected by a Green Belt, and whilst such a belt is proposed in the draft Local Plan, Fife Council has so far failed to implement the Structure Plan requirement.

OBJ 6 Page 6, Objectives, Ensuring effective resource management and promoting an accessible, connected and networked region, Second bullet point.

Change “Promote transport linkages, infrastructure improvements and network improvements;” to “Promote transport linkages, infrastructure improvements and rail, bus and cycle path network improvements and extensions;”.

Rationale

The expression “network improvements” could, in the case of rail, be deemed to be restricted to things such as the dualling of single-track lines. Encouraging, where possible, extensions of the bus, rail and and cycle path networks is clearly consistent with TAYplan’s support for reducing carbon emissions.

OBJ 7 Page 6, Objectives, Ensuring effective resource management and promoting an accessible, connected and networked region, Third bullet point.

Change “Ensure that new development makes best use of existing networks of infrastructure, movement corridors and ecosystems;” to “Ensure that new development is located to make best use of existing networks of infrastructure and movement corridors and to protect ecosystems;”.

Rationale

In the interests of clarity.

OBJ 8 Page 7, Proposals1:Map, Legend.

Change “The Strategic Development Areas;” to “Approximate locations of Strategic Development Areas;”

Rationale

In the interests of clarity. This is only a small-scale diagrammatic map, and, moreover, precise representation of an area which as yet has no exact definition in any adopted plan is clearly not possible.

OBJ 9 Page 7, Proposals1:Map.

Preferred amendment

Delete “St Andrews West and Science Park” from Legend and remove corresponding area from map.

Rationale

Consistency with OBJ 29.

Failing which:- Map, Legend, 11.

Change “St Andrews West and Science Park” to “St Andrews West”.

Rationale

(i) There has been no indication that TAYplan wishes to depart from the position of the 2009 Fife Structure Plan on this matter. The latter document discusses the Science Park under a St Andrews West heading, indicating that it is subsumed within that area.

(ii) The possibility of locating a Science Park on the site of the former paper mill at Guardbridge also merits consideration.

OBJ 10 Page 7, Proposals1:Map.

Insert on map, in an appropriate colour, a broken line joining St Andrews to the nearest point of the rail line between Cupar and Leuchars. Make the corresponding addition to the legend with the words “Proposed rail link to St Andrews”.

Rationale

TAYplan (p.12) says “The economic recovery of the region and new development will need to be supported by appropriate infrastructure, particularly transport infrastructure. This will also contribute to behavioural change and reducing reliance on the car and on road-based freight. Ensuring that this can be delivered will require land and routes to be protected from prejudicial development.”

We agree entirely and would wish to see the principle applied with some consistency. As the effects of climate change have been felt increasingly, the case for re-instatement of the rail link to St Andrews has grown ever stronger. Reducing carbon emissions implies providing a range of transportation options. It is clear that, for many residents and visitors, the relatively short distance from St Andrews to Leuchars forms a major psychological barrier to the use of public transport. Once residents have got in their cars they will often drive not just to Leuchars, but rather continue to their final destinations, be they in Edinburgh, Dundee, Glasgow or in England. The major potential benefit of a railhead in St Andrews is that such people are attracted back to public transport, thereby yielding reductions in carbon emissions over much longer journeys than the length of the rail link itself.

The need for the rail link is further increased by TAYplan’s strategy. Whilst we wish to see the proposals amended to avoid damage to the environmental setting of the town, the increase in the size of the town will be at least 16%, and, if our views are not heeded, may well end up in the range 25%-30%. No quantitative assessment has been made of the effect

on the town centre of the consequential increase in vehicular traffic. For many years, traffic counts on the A91 have shown an inexorable increase in the numbers of vehicles, which rise by a percentage point or two each year. The historic centre of St Andrews is less and less able to cope with this influx, and gridlock occurs with increasing frequency, particularly on public holidays. It is obvious that the TAYplan strategy will further exacerbate these problems. In particular, if the tourist industry in St Andrews is to expand further, as TAYplan desires, then an increasing proportion of tourists must arrive by public transport. A range of approaches will be needed to address the ever worsening problem of congestion, and reinstatement of the rail link is certainly one important component.

OBJ 11 Page 8, Location Priorities, Paragraph 2.

Change “They also have significant land capacity to accommodate future development.” to “Many of them also have significant land capacity to accommodate future development.”

Rationale

The St Andrews Strategic Study and the landscape studies by Tyldesley and by Alison Grant make it clear that relatively little development is possible in St Andrews without destroying the landscape setting of the town. Indeed the Strategic Study concluded that “St Andrews is at its landscape capacity and no major expansion should take place”. A sustainable approach demands that housing land in St Andrews should be viewed as a scarce resource, used primarily to address the need for affordable housing, not squandered on luxury housing.

OBJ 12 Page 8, Location Priorities, Paragraph 7.

Change “or attending major events, such as international golfing competitions e.g. St. Andrews” to “or as bases for attending major events, such as international golfing competitions e.g. St Andrews.”

Rationale

Grammar and clarity.

OBJ 13 Page 9, Policy 1: Location Priorities, A.

Change “Tier 2 settlements have the potential to make a major contribution to the regional economy but will accommodate a smaller share of the region’s additional development” to “Tier 2 settlements have the potential to make a major contribution to the regional economy but will accommodate a smaller share of the region’s additional development both in absolute terms and relative to their size.”

Rationale

To ensure that smaller communities do not have to accommodate a disproportionate share of new development.

OBJ 14 Page 9, Policy 1: Location Priorities, A, Bullet point 2.

Preferred amendment

Delete “Beyond the Strategic Development Area in Policy 4 for St. Andrews there will be no additional strategic development of this scale in the foreseeable future”

Rationale

Consistency with OBJ 29.

Failing which:-

Change “Beyond the Strategic Development Area in Policy 4 for St. Andrews there will be no additional strategic development of this scale in the foreseeable future” to “Beyond the Strategic Development Area in Policy 4 for St. Andrews there will be no additional strategic development of this scale since to do so would cause irreparable damage to the landscape setting of the town.”

Rationale

Bitter experience suggests that the foreseeable future may be very brief indeed for some planners. The present generation of planners in Fife was happy to ditch the conclusion of the Strategic Study that “St Andrews is at its landscape capacity and no major expansion should take place” produced by Fife’s own planners. They did so within months of its publication in 1998 without ever the slightest murmur of an apology to the town. The proposed bullet point was presumably drafted in an attempt to reduce the level of objections rather than in any belief that their successors would act in a more principled manner.

OBJ 15 Page 11, Policy 2Ai.

Change “a presumption against development in areas vulnerable to coastal erosion, flood risk and rising sea levels; including the undeveloped coast.” to “a presumption against development in areas vulnerable to coastal erosion, flood risk or rising sea levels; or situated on the undeveloped coast.”

Rationale

In the interests of clarity. In particular, the presumption should apply if any one of the possibilities arises: the use of “and” suggests that more than one is necessary.

OBJ 16 Page 11, Policy 2Aiv.

Change “Identifying, retaining and enhancing existing green infrastructure and spaces” to “Identifying, retaining and enhancing existing open spaces.”

Rationale

In the interests of clarity. The expression “green infrastructure” is not defined: the later reference to “their multiple uses” presumably means we are not talking about wind turbines which some might see as green infrastructure.

OBJ 17 Page 11, Policy 2Ai.

Delete “To ensure flood risk is not exacerbated, mitigation and management measures; such as those envisaged by Scottish Planning Policy, should be promoted;”

Rationale

Discussion of mitigation and management measures appears to undermine the presumption against development in the earlier part of the clause. The Policy as written requires masterplans and development proposals to promote mitigation and management measures. This appears at variance with SPP para. 207 which says “Proposals for development which would require new flood risk management measures should only be promoted through the development plan.”

OBJ 18 Page 11, Policy 2F, Integrate networks.

Change “Making it easy, safe and desirable to walk and cycle within and between neighbourhoods utilising existing green space and water networks” to “Making it easy, safe and desirable to walk and cycle within and between neighbourhoods utilising existing green space and paths alongside water networks”.

Rationale

We do not see a need for Development Plans to promote paddling.

OBJ 19 Page 11, Policy 2F, Work with the grain of the place.

Change “This approach will help determine the size, shape and form of development and how it can respond to adaptation to help achieve future-proofing our new communities and facilities” to “This approach will help determine the size, shape and form of development and make communities and facilities more sustainable”.

Rationale

The second half of the proposed sentence leaves us completely mystified. Our proposal represents a guess at what it might mean.

OBJ 20 Page 13, Policy 3, Employment Land

Change “identifying and safeguarding at least 5 years supply of employment land within principal settlements” to “identifying and safeguarding an appropriate supply of employment land in the light of historical demand within principal settlements”.

Rationale

The concept of “5 years supply” appears to be undefined, and such a notion does not appear to have a basis in SPP. The quantities of land designated for employment purposes should not appear grossly disproportionate in the light of the historic record.

OBJ 21 Page 13, Policy 3, Employment Land

Change “safeguarding areas identified for class 4 office type uses in principal settlements” to “safeguarding areas identified for class 4 office type uses in principal settlements proportionate to historic demand”.

Rationale

We wish to avoid useful housing land being wasted by being given a class 4 office designation and subsequently lying unused for years.

OBJ 22 Page 13, Policy 3, Green Belts.

Change “continuing to designate green belt boundaries at both St. Andrews and Perth” to “designate green belt boundaries encircling both St. Andrews and Perth”.

Rationale

In the interests of accuracy. It is not possible to continue to designate green belt boundaries that have not hitherto been designated.

OBJ 23 Page 13, Policy 3, Green Belts.

Change “to manage long term planned growth including infrastructure in this Plan’s Proposals Map and Strategic Development Areas in Policy 4” to “to manage long term planned growth including proposals shown in this Plan’s Proposals Map”

Rationale

Strategic Development Areas are shown on the Proposals Map and so do not require separate mention.

OBJ 24 Page 13, Policy 3, Finite Resources.

Change “protect prime agricultural land, new and existing forestry areas, and carbon rich soils (where identified) where the advantages of development do not outweigh the loss of productive land.” to “protect prime agricultural land, new and existing forestry areas, and carbon rich soils (where identified).”.

Rationale

The proposed rider renders the clause useless under the current planning ethos which values development far more highly than these finite resources.

OBJ 25 Page 13, Policy 3, Transport.

Change “which is essential to support a shift from reliance on the car and road-based freight and support resource management objectives” to “which is desirable for supporting a shift from reliance on the car and road-based freight or for supporting resource management objectives”.

Rationale

The sub-clause as it stands is ineffective as it will very rarely be possible to establish that infrastructure provision is essential for a modal shift. There is no need for a test of this rigour. A test of desirability is more in tune with the goals of this Plan.

OBJ 26 Page 14, Strategic Development Areas, para.8

Change “housing offer” to “available housing”.

Rationale

Use of ordinary English rather than “planner-speak”. cf. SPP para. 11 “Development plans . . . should be . . . written in plain language.”

OBJ 27 Page 14, Strategic Development Areas, para.8

Delete “St. Andrews West “

Rationale

(i) This will not be a convincing example to any reader familiar with the history of employment sites in the town over the last twenty years. Such sites can only contribute to the competitiveness of the region if they are used. Those identified in the last two adopted Local Plans have not been.

(ii) Consistency with OBJ 29.

OBJ 28 Page 14, Strategic Development Areas, para.8

Delete “The emphasis in St. Andrews will also be to build on the continued economic potential of its international reputation as the home of golf and a tourist destination.”

Rationale

(i) Factual accuracy. As this page is about Strategic Development Areas, this paragraph has to be referring to St Andrews West. The draft Local Plan proposals for St Andrews West include a proposed hotel, but cannot be said to emphasise tourism. These proposals make no reference to golf at all.

(ii) Consistency with OBJ 29.

OBJ 29 Page 15, Policy 4: Strategic Development Areas, A, Table 1.

Preferred amendment

Delete “St Andrews West and Science Park 1090 homes, 10ha of employment land and 10ha for a science park”.

Rationale

(i) This Community Council has never believed that the use of a Strategic Development Area (SDA) offers an appropriate vehicle for the development of the town. Although the SDA appears in the approved Fife Structure Plan, at the time this objection is written that Structure Plan remains subject to a legal challenge. It is also true at time of writing that, as the St Andrews and East Fife Local Plan is still at a draft stage, no location for an SDA here has yet been approved. Nevertheless it appears highly probable that, if an SDA were to be agreed, it would consist entirely of greenfield land. Worryingly the viability of the SDA relies on neglecting extensive areas of brownfield land within the existing town boundaries. Indeed we believe that Fife Council has taken various steps of that nature in order to make the SDA appear viable. These include promoting the use of the former healthcare site in Pipeland Road for office use, when we see it as an ideal location for affordable housing, and reducing the indicative capacity of the St Leonards Fields/ Memorial Hospital from 180 housing units to 120 units between successive drafts of the St Andrews and East Fife Local Plan.

(ii) Coherence with TAYplan Policy 1B. In the context of TAYplan, Fife Council's approach should be seen as all the more ill-advised. Policy 1B requires the reuse of previously developed land to be prioritised, and favours the use of land within principal settlements ahead of land on the edge of principal settlements.

(iii) The same argument is further reinforced by SPP para. 80, which says, "Planning authorities should promote the efficient use of land and buildings, directing development towards sites within existing settlements where possible to make effective use of existing infrastructure and service capacity and to reduce energy consumption. Redevelopment of urban and rural brownfield sites is preferred to development on greenfield sites. When identifying locations for housing, planning authorities and developers should consider the reuse of previously developed land before development on greenfield sites . . .".

(iv) There are very considerable uncertainties in the local planning scene at the present time, not least those generated by the recent decision to close RAF Leuchars. North Fife needs the freedom to respond in a flexible manner as the implications of that closure, and any other consequences of the recession, gradually become clear over the next decade. A decision to tie down a large part of the housing land requirement to a single site in St Andrews removes that flexibility and displays serious lack of foresight. A much more astute approach is to simply allocate the requirement to the Housing Market Area without tying the hands of the Local Plan.

Failing which:-

(a) if the new Madras College is sited at Kilrymont

Change "St Andrews West and Science Park 1090 homes, 10ha of employment land and 10ha for a science park" to "St Andrews West 600 homes, 5ha of employment land and 5ha for a science park".

Rationale

Change of name. cf. OBJ 9.

Science Park/Employment land

The designation of 10 hectares of land in St Andrews for a Science Park and a further 10 hectares for business use displays a depressing ignorance of the history of sites identified for such purposes in earlier Development Plans. Local Plans have designated high tech sites in both the Langlands area and near Strathtyrum, but in both cases they lay unused for years and were never developed. We are happy to encourage spin-off ventures from university research, but the difficulties of such exercises in the St Andrews context are evident from the limited success that has been enjoyed to date. Even our revised proposal of 5 hectares for each of these purposes is wildly excessive on the basis of past experience. There is no sense in which non-availability of land has been a problem. It is also pertinent to recall conclusion 9 of the St Andrews Strategic Study which said "St Andrews does not have the potential to support significant amounts of new industrial land". We are conscious that areas brought within the town envelope for employment purposes are liable to end up being developed for other purposes. This is not a satisfactory way to proceed.

Number of homes.

(i) Structure Plan numerical requirement. The authors of TAYplan appear to want a precise number here, but the one used appears to result from a misreading of the 2009 Fife Structure Plan, as no desire to depart from that position is reported. On p.21 of that Structure Plan it says, "Land for a minimum of 1,000 houses in the period to 2026 will be identified; a large proportion of which will be within a Strategic Land Allocation to the west of the town and

will maximise the use of brownfield sites where possible and meet the significantly higher need for affordable housing provision in St Andrews and NE Fife.” Our figure of 600 units is consistent with the large proportion indicated in this Plan.

(ii) Structure Plan brownfield requirement. The other key point to note in the quotation in the previous paragraph is the requirement to “maximise the use of brownfield sites where possible”. Noting the contribution from small brownfield sites, it is certainly feasible to locate 490 units on brownfield land in St Andrews. Hence there would be no need to site more than 600 units on greenfield land to the west of the town.

or (b) if the new Madras College is sited at Langlands (currently the preferred option of Fife Council)

Change “St Andrews West and Science Park 1090 homes, 10ha of employment land and 10ha for a science park” to “St Andrews West 400 homes, 5ha of employment land and 5ha for a science park”.

Rationale

Approximately 200 further units on brownfield land will become feasible if the current proposal to abandon Kilrymont as a Madras College site is adopted, implying a need for no more than 400 units on greenfield land to the west of the town.

OBJ 30 Page 16, Housing, para. 3.

Change “The TAYplan-wide Housing Need and Demand Assessment identifies the likely need and demand for between 2,050* and 3,590 affordable and market housing solutions per year during the Plan period. This Plan sets out a framework to identify effective housing land to enable the delivery of around 2,170 homes per year across the TAYplan region, including sites already with planning permission”

to “The TAYplan-wide Housing Need and Demand Assessment identifies the likely need and demand for between 2,050* and 3,590 affordable and market homes per year if the current backlog of affordable housing is filled over a ten year period. Thereafter lower rates would be appropriate. This Plan therefore sets out a framework to identify effective housing land to enable the delivery of around 1,870 homes per year across the TAYplan region, including sites already with planning permission”.

Rationale

Language

The change from “housing solutions” to “homes” again reflects SPP para. 11 “Development plans . . . should be . . . written in plain language.”

Revisions to numbers:-

The Arneil Johnston consultancy report in November 2009 calculated the need for affordable housing as the sum of two components. The first component was their estimate that in 2009 the then current unsatisfied need for affordable housing amounted to 12,230 homes. They assumed that it would be totally satisfied within the ten-year period from 2009 to 2018 by providing 1223 homes within each of those years. The second component was an estimate for each of these ten years of the amount by which the newly arising need for affordable housing would exceed the number of units of such housing that became available in the given year.

The total number of new housing units required was then obtained by taking the estimated total of affordable units required and adding to it the corresponding estimated total number of market units that will be needed. Arneil Johnston’s estimate was that for the ten years to

2018, the required number of units of either type lay between 20446 and 35877. Rounding to nearest 10, TAYplan says the corresponding annual requirement lies between 2050 (we would have said 2040) and 3590.

TAYplan, with the apparent endorsement of the Centre for Housing Market Analysis, assumes that these rates continue to apply until 2024, and that they are likely to continue until 2032. Much could be written about the validity of this approach, but we confine ourselves to one aspect that appears to us to be an apparent conceptual flaw. The Arneil Johnston approach assumes that the complete backlog of need for an estimated 12230 affordable homes is addressed within the ten year period that they considered, and there is therefore no need to provide those people with another affordable home each within the next ten year period.

If it is assumed that the estimated backlog of 12230 affordable homes is filled just once within the twenty years of the Plan period, then, retaining all other assumptions as before, the number of homes, both affordable and market, required each year then lies between 1740 and 2980. Choice of the corresponding point within this range implies that the TAYplan annual target figure of 2170 homes should be reduced to 1870.

OBJ 31 Page 16, Housing, para. 6.

Change “The TAYplan-wide Housing Need and Demand Assessment estimates that the recovery in demand would be complete by 2018/19” to “The TAYplan-wide Housing Need and Demand Assessment suggests that the recovery in demand may be complete by 2018/19”.

Rationale

The word “estimates” implies a more scientific approach than is appropriate for this crystal-ball gazing. The more recent assessment by the Office of the Chief Economic Adviser suggests that “it may take until 2025/26 for the Scottish Government Budget to return to 2009/10 levels”. Knock-on effects on the economy could well continue to be felt until that time.

OBJ 32 Page 16, Housing, para. 6.

Change “The scale of growth for 2024-32 is likely to be similar” to “If the current backlog of affordable housing has been met by that stage, the scale of growth for 2024-32 is likely to be somewhat lower”.

Rationale

As given in the rationale for OBJ 30.

OBJ 33 Page 16, Housing, para. 6.

Delete “From a place shaping perspective the construction sector will need to provide housing that meets the quality requirements and the needs and aspirations of a range of different households, including low cost housing.”

Rationale

From a St Andrews perspective, this is completely out of touch with reality, unless some element of compulsion is imposed. When choosing what size of properties to build in St Andrews, the only need that the construction sector feels is the need to maximise profits, and it almost always concludes that that means going for the top-of-the-range. It may well be true that if the Plan’s goals are to be achieved the construction sector will need to act in this way, but, if so, then this sentence is saying that the Plan is unachievable.

OBJ 34 Page 16, Housing, Second bullet point.

Change “Whilst average annual build rates are identified, these are only averages and the period in which these build rates should be achieved is within and over the 12 years to 2024” to “Whilst average annual build rates are identified, these are only averages and the period in which these average build rates should be achieved is the 12 years to 2024”.

Rationale

Simplicity. The extra verbiage does not appear to add any extra nuance of meaning.

OBJ 35 Page 16, Housing, Third bullet point.

Replace “Local Development Plans may allocate additional land to ensure an effective supply of housing land to assist in the delivery of Proposal 2 and to provide choice” by “Local development plans should allocate land on a range of sites which is effective or capable of becoming effective to meet the housing land requirement up to year 10 from the predicted year of adoption, ensuring a minimum of 5 years effective land supply at all times”.

Rationale

The original wording is imprecise, raising the questions “additional to what, exactly?” and “provide choice for whom?” Our proposed wording merely reiterates the requirement from SPP para. 72, but has the advantage of precision. The SPP requirement certainly provides an over-abundance of sites in the early years of the Plan, and, as TAYplan (p.16, para. 5) is to be reviewed by 2017, that situation will not change in the latter years of the Plan.

OBJ 36 Page 16, Housing, Fourth bullet point.

Delete “The critical issue for the quality agenda is to ensure that the housing figures themselves do not hold back good quality development that delivers the objectives of this Plan”.

Rationale

(i) This sentence is inciting Local development plans to follow an anarchic regime, allocating considerably more housing land than is implied by an already generous housing land requirement. It also opens the door to planning consent for piecemeal applications for land not specified in the development plan. Far from boosting any quality agenda this is a recipe for urban sprawl. It runs contrary to the recognition in Policy 2F that respect for the grain of a place will determine the size of acceptable development. A heavy price is paid in environmental terms for excessive designation of housing land and the threat of development unnecessarily blights the lives of adjoining residents.

(ii) In contrast to the naive belief that this will encourage development, gross over-provision of housing land is in practice likely to have the reverse effect. As we have noted above, developers in St Andrews believe that they can maximise their profits by building mostly top-of-the-range properties. The well-informed developer will also know that these properties have often sold slowly – so slowly in fact that in one recent (pre-recession) case two developers sold out to other developers before the third eventually completed the site. They must surely realise that their problems will be severely compounded if the planning regime is so lax that a wildcat developer is likely to jump in on a nearby site and provide further competition. It is indeed ironic that a Plan proposing such a regime can conclude (p.22) “The key role of the planning system is to provide a clear and certain framework for taking planning decisions”!

(iii) In his letter of 29 October 2010 to Heads of Planning, Chief Planner Jim Mackinnon wrote “Where a planning authority has a 5 year supply of effective housing land but the

impediment to developing that site is the general availability of mortgages or low level of demand from purchasers then there will be little if anything to be gained by releasing additional sites.” This looks to be a shrewd assessment of the situation that is likely to apply for the foreseeable future.

(iv) The TAYPlan Housing Provision Analysis Paper (p.26) says “If the economic recovery is slower or unevenly distributed it could be as damaging to the Plan’s locational objectives to provide for too much housing as it would be to provide for too little.”

OBJ 37 Page 17, Policy 5: Housing, A.

Delete “To assist the delivery of these build rates, Local Development Plans may allocate a larger land supply”.

Rationale

As for OBJ 35 and OBJ 36.

OBJ 38 Page 17, Policy 5: Housing, A.

Change “to provide an effective and generous supply of land to assist in the delivery of in the order of 26,000 units up to year 2024 across TAYplan.” to “to provide an effective and generous supply of land to assist in the delivery of in the order of 22,400 units up to year 2024 across TAYplan.”.

Rationale

This is a consequential change to the revision of the required annual target rate from 2170 to 1870.

OBJ 39 Page 17, Policy 5: Housing, A.

Change “In the period 2024 to 2032 in the order of 17,400 units may be required.” to “In the period 2024 to 2032 approximately 15,000 further units may be required.”.

Rationale

This is another consequential change to the revision of the required annual target rate from 2170 to 1870.

OBJ 40 Page 17, Policy 5: Housing, Proposal 2.

Replace the table with:-

Housing Market Area	Average annual housing market area build rate
Highland Perthshire	70
Perth	440
Eastern	100
Strathearn	110
Kinross	60
Dundee City	530
South Angus	70
West Angus (Forfar, Kirriemuir & the Glens)	80
East Angus (Arbroath)	70
North Angus (Breachin and Montrose)	70
St Andrews and East Fife	140
Cupar and North West Fife	130
Total	1870

Rationale

Under OBJ 30 above, we presented the rationale for reducing the TAYplan annual target figure from 2170 to 1870 homes. For most of the Housing Market Areas, the revision of Proposal 2 displayed above is obtained by corresponding pro-rata reductions of the required rates.

More thought appears to be required on the Housing Market Areas in North Fife. The proposal in TAYplan is not coherent. Part C of Policy 5 seeks to ensure delivery of houses within Strategic Development Areas. The proposed annual rate of 110 units for the Cupar and North West Fife HMA is, however, insufficient even to permit delivery of the 1400 required units for Cupar North within the 12 year period that is the primary concern of these housing proposals, whilst the number of units required elsewhere in this HMA is presumably non-zero. Our proposed sub-division between the North Fife HMAs permits delivery of the 1400 units within that time-frame, whilst leaving a small provision of 160 units for other parts of the Cupar and North West Fife HMA.

It is certainly arguable that our reduced build rates remain excessive. The Housing Needs and Demand Assessment (Fig. 3.19 Option A) indicates a build rate of 1560 for the TAYplan region based on the 2006 GROS household projections. Our proposed build rate of 1870, although less damaging than the TAYplan proposal, still implies population acquisition from the west of Scotland. As we noted in our response to the Main Issues Report, we should not be attempting to deprive authorities in the west of a sustainable future of their own.

OBJ 41 Page 17, Policy 5: Housing, A, Second bullet point.

Change “ensure that the mix of housing type, size and tenure meets the needs and aspirations of a range of different households throughout their lives” to “ensure that the mix of housing type, size and tenure broadly matches the proportions of need and demand identified in the Housing Needs and Demand Assessment (Appendix 4)”.

Rationale

To attempt to make operational what will otherwise be a pious but unrealised hope.

OBJ 42 Page 17, Policy 5: Housing, A, Second bullet point.

Change “Local Development Plans (where applicable) will need to set affordable housing requirements for or within each housing market area” to “Local Development Plans will need to set affordable housing requirements for each housing market area (or appropriate sub-area), noting that the calculations on which the housing land requirement is based imply that the percentage of affordable housing should exceed 85% in Angus, should exceed 65% in North Fife and should exceed 70% in Perth and Kinross.”

Rationale

To emphasise that, with the exception of Dundee City, it is primarily the need for affordable housing that is driving the calculations given in the Housing Needs and Demand Assessment and in its Appendix 4 (the Assessment of Housing Need and Demand by Arneil Johnston).

OBJ 43 Page 17, Policy 5: Housing.

Insert part “D. Should use historic data and urban capacity studies to provide realistic assessments of the extent to which the housing land requirement can be met through small sites and windfall sites.”

Rationale

Such assessment is presented as merely optional in the Housing Needs and Demand Assessment. This approach is inconsistent with Policy 1B which attempts to encourage the use of land within settlements in preference to greenfield sites. It also fails to respond to SPP para. 81 in which “Planning authorities are encouraged to use urban capacity studies, along with assumptions about the expected output from windfall sites, to inform the settlement strategy.”

**OBJ 44 Page 17, Policy 5: Housing, B, footnote with three asterisks.
Our preference, if OBJ 29 is accepted, is to leave this unchanged.**

Failing which:-

Change “With the exception of West/North West Perth the other Strategic Development Areas already have a framework/masterplan in place” to “With the exception of West/North West Perth and St Andrews West the other Strategic Development Areas already have a framework/masterplan in place”.

Rationale

The draft St Andrews and East Fife Local Plan says that the “masterplan process will involve community engagement on all aspects of the proposals”. This has not yet happened so the masterplan cannot be said to be already in place.

OBJ 45 Page 20, Town centres, para. 4.

Change “It is important to protect and enhance their vitality and viability” to “It is important to encourage their creation, and to protect and enhance their vitality and viability”

Rationale

To acknowledge that the creation of more local centres will assist in reducing unnecessary travel and in reducing the carbon footprint.

OBJ 46 Page 22, Delivering the Strategic Development Plan, para. 1.

Change “The key role of the planning system is to provide a clear and certain framework for taking planning decisions to foster sustainable economic growth” to “One important role of the planning system is to provide a clear and certain framework for taking planning decisions to foster sustainable economic growth”.

Rationale

To acknowledge that the planning system ought to be about a lot more than promoting economic growth.

Proposed Plan Action Programme

OBJ 47 Project/Proposal 16*

Preferred change – delete proposal

Failing which amend as per OBJ 29 above

Rationale

As indicated under OBJ 29 above.

OBJ 48 Project/Proposal 17*

Delete “St Andrews. To be delivered through the St. Andrews West Strategic Land Allocation (2006-2026).” and “part of St. Andrews Western expansion”.

Rationale

As indicated under OBJ 29 above. We are not opposed to the principle of park-and-ride, but to the linkage with what is described elsewhere in TAYplan as a Strategic Development Area.

OBJ 49 Project/Proposal 29*

Delete Project/Proposal

Rationale

As indicated under OBJ 29 above. There is no Transportation Assessment or other quantitative evidence to back the assertion that the Link Road will relieve traffic issues in the town centre. If the Link Road is accompanied by 1090 houses as TAYplan proposes, the strong likelihood is that traffic congestion in the town centre will increase.

OBJ 50 Page 35 Actions arising from the Appropriate Assessment (Habitats Regulations Appraisal (HRA)): (1)

Delete “St Andrews West”.

Rationale

Consistency with OBJ 29 above.

OBJ 51 Insert further Project/Proposal “Reinstatement of rail link to St Andrews”

Description and strategic fit

- Expands opportunities for St Andrews residents, University and businesses by promoting environmental quality and good connectivity, reducing journey times.
- Promotes more sustainable patterns of travel.
- Assists in reducing TAYplan’s carbon footprint and facilitates adaptation to climate change.
- Enhances tourism appeal and opportunities.

Evidence and progress

- Feasibility study by Tata Steel nearing completion.

Rationale

As given under OBJ 10 above.

Yours faithfully,

Ian Goudie
Vice Chair