



Royal Burgh of St. Andrews Community Council

Planning Directorate,
The Scottish Government,
Planning Services Division,
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Victoria Quay,
Edinburgh,
EH6 6QQ

10, Windsor Gardens
St Andrews
KY16 8XL

13 March 2008

Dear Sir/Madam,

The Finalised Fife Structure Plan 2006-26 Housing Land Requirement Reappraisal

I write on behalf of the Planning Committee of the Community Council to reaffirm our objections to the proposed Fife Structure Plan 2006-26, and in particular to the Housing Land Requirement Reappraisal (HLRR). We attach for reference our objections (hereafter denoted by CC07) to the Consultative Statement CS07 for HLRR, and also our objection (CC06) to the Finalised Fife Structure Plan. We note below some of the more important ways in which Fife Council has failed to respond adequately to our objections to HLRR. We also wish to object to the way in which the housing need in the latest documentation appears like a rabbit out of a hat. Furthermore we have concerns about the manner in which Fife Councillors appear to have been misled when they adopted HLRR at the meeting of Fife Council in December 2007.

Housing need

Fife Councillors appear to have been content at that meeting to adopt a figure for housing need that has been completely re-worked from first principles with no detailed supporting justification. At best there seems to have been a general description of the methodology adopted and an assertion that it complied with General Register Office for Scotland (GROS) practice. The December 2007 Report of Survey (para.2.12) says, "The Council has developed its own household projections, based on what the GRO(S) 2004-based projections show on demographic composition trends (in terms of age, gender, and household composition patterns) with an assumption that the population will grow by 5% between 2006 and 2026." We do not object to the principle of local projections, which para. 2.4 of the same document notes is supported by PAN38. It seems entirely inappropriate, however, for the projected number of households in 2026 to appear in Table 1 with no supporting tables displaying the detail of the calculation. The implied figure for housing need is probably the most important statistic in the whole exercise, and we certainly do not accept the notion that this should be taken on trust. Fife Council's calculations over this whole process, from the Draft Structure Plan in 2005, through the Finalised Plan in 2006, to the first attempt at HLRR, have contained a catalogue of errors, and in places, questionable objectivity. However long and intricate the calculations required to derive the housing need, they should not be concealed behind a veil of secrecy, but exposed to public scrutiny.

The planning horizon

It is a little ironic that Fife Council cites PAN38 in support of local projections, since, as we noted in CC07 (paras. 12 & 13) it appears happy to ignore the very clear advice of both PAN38 and SPP3 on the matter of the planning horizon. Our reworking of the housing shortfall (CC07, paras. 30-35) displayed clearly the unsurprising conclusion that the housing shortfall is heavily dependent on whether a 12 year or a 20 year horizon is adopted. Indeed our housing need figure differed by approximately 10,000 from Fife Council's, with the greater part of the difference directly attributable to the horizon. To anyone with statistical literacy, the advice of PAN38 and SPP3 - that it is unwise to attempt to produce firm figures for the housing requirement more than 12 years into the future - is almost at the level of basic common sense, and we are at a loss to understand why the previous Scottish Executive has condoned the breaching of this fundamental guideline by other Councils. Even if the present Scottish Government is prepared for some parts of PAN38 and SPP3 to be treated on a "take it or leave it" basis, our advice is that the 12 year planning horizon should be treated as sacrosanct.

Small sites

One of our criticisms of HLRR concerned the allowance made for small sites. Fife's response to our comments is very weak. The December 2007 Report of Survey (para. 3.7) says, "Small site completions have been reducing, so only a small allowance of 246 units is made for them in the Housing Land Supply calculation." As we pointed out in our submission (CC07, paras. 22-24), the allowance is extremely small, envisaging only the same number of such completions in 20 years as occurred in the last year for which there are records. This is approximately equivalent to assuming that the small site completion rate will decline at the rate of 50% year on year! In other words down from 246 to 123 in year 1, down to 62 in year 2, 31 in year 3, 16 in year 4, 8 in year 5, 4 in year 6, 2 in year 7, and essentially zero thereafter.

Such a spectacular decrease seems to us to be verging on absurdity, and we are extremely doubtful whether Fife could produce viable evidence to justify such a claim. In Fife's Housing Review 2005, the Council declares that, "In 2005 Fife Housing Review Fife Council has for the first time monitored house completions on small sites." If this assertion is to be believed, the Council does not have the data required to attempt to provide a statistical justification of its assertion of a dramatic decline over a 20 year period. Indeed the completely unscientific nature of the whole exercise is evident from the way Fife feels able to slash the allowance made for small sites in East Fife from a figure of 1000 in the 2006 version of the Structure Plan to 107 in HLRR without offering a shred of evidence to support such a change.

Information to councillors

(i) The housing land requirement

The Background Report Appendix 2 (para. 4.4) for the Fife Council meeting of December 2007 said, "The Council confirms its preferred policy that: The housing land requirement remains as per the consultative reappraisal documents to require 31,640 new houses across Fife over the next 20 years." In fact, for the case of 5% growth, the housing land requirement given in Table 1 of CS07 was 30,930. Thus the requirement is not remains "as per the consultative reappraisal documents", but has been increased by 710. This is confirmed by part of the response to the Community Council's submission on HLRR when Fife said, "The council welcome the alternate Housing Land Requirement calculations, but we have outlined the revised approach that, following consultation with GROS, has been adopted and results in a small increase in the Housing Land Requirement from 30,930 to 31,640 units over the 20 years."

(ii) Overall effect on St Andrews

On 28 December 2007, three of the local Fife councillors wrote to the St Andrews Citizen saying that, "Revised housing numbers for the next 20 years have finally been approved by Fife Council. The strategic plan now envisages that up to 1000 additional houses be built on the western edge of St Andrews, averaging 50 per year". Although they omitted the rider, these words mirrored the Background Report Appendix 2 (para. 19.3) for the Fife Council meeting of December 2007, which said, "Over a 20 year period (2006-26), development would amount to around 50 houses per annum; this is slightly less than recent completion rates of 55 houses per annum over the last 20 years. This will be complemented by brownfield sites that are expected to come forward in the next 10 years."

It seems to us not unreasonable that Fife councillors, who are not professional planners or statisticians, may have read the Background Report as giving an overall assessment of future development in St Andrews and as implying a small decrease in the rate of house-building in the town. In our view, it is highly misleading to compare the annual building rate on one site proposed to meet a part of the housing shortfall and the past total completion rate for the town. Small sites make a large annual contribution to the total of completions in St Andrews, and cannot be portrayed as some minor perturbation on top of the greenfield site component.

Yours sincerely,

Ian Goudie
Vice-Chair