



Royal Burgh of St. Andrews Community Council

10, Windsor Gardens
St Andrews
KY16 8XL

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

2 February 2009

Dear Ms. Carey,

Proposed Modifications to the Finalised Fife Structure Plan 2006-2026

I write, on behalf of the Royal Burgh of St Andrews Community Council, to object not only to the proposed Modifications to the Fife Structure Plan, but also to the procedure being followed. The residents of St Andrews, and indeed of N.E. Fife as a whole, can with some justice, feel extremely angry about the way this Structure Plan saga has proceeded. The complete cynicism of the way the views of the few are being imposed on the community at large will hardly endear people to the political process. We have no great expectation that our objections will be heeded: it has already been amply demonstrated that thousands of objections from Fife carry no weight at all. We nonetheless wish to record that we understand what is going on: a performance as poor as this by both national and local government should not be allowed to pass without comment.

Affordable housing

If this Structure Plan is approved in anything resembling its current form, it will look out-of-date from day one. We appreciate that the full magnitude of the credit crunch was not evident in the autumn of last year when these Modifications were being drawn up, and the number of years for which recession will continue remains a matter of speculation. We would submit, however, that the position on affordable housing had at that stage already moved on significantly from that which prevailed three or four years ago when this Fife Structure Plan was conceived. Lack of affordable housing is a major problem in St Andrews, and we had hoped that the Structure Plan would find an intelligent way of providing for local need without at the same time destroying the environment of the town. Three years ago the argument that affordable housing could only be obtained as a spin-off from private development looked shaky, and we were not over-impressed by the requirement that 30% of new housing provided by developers in the town had to be affordable. This means that we get seven up-market houses that we don't need for every three that we do. In the intervening three years, it has become clear that even a return to council house building is not the unthinkable concept that it was in the post-Thatcherite era. If the 30% deal looked poor three years, it appears all the more dismal now. Scarce housing land around St Andrews is to be squandered for little local gain.

Different premises – same conclusion!

Over the years we have frequently complained about the way Fife's officials select and use data to fit pre-chosen conclusions. With previous Structure Plans, though, we believed we could look to Edinburgh for a more objective approach. We are thus bitterly disappointed to find that the Scottish Government planners make no pretence of covering the housing land requirement with even a veneer of science. Rather than embarking on their own analysis, they have simply embraced the discredited figure of 35,200 from the Finalised Fife Structure Plan 2006, a number that we have previously shown

is based on statistical illiteracy. Fife Council's planners said that they reached this answer based on a 5% growth in Fife's population by 2026. The Scottish Government now says that, starting from their (highly improbable) belief that Fife's population will rise by 8% over the Plan period, the same answer is appropriate. The conclusion that either Fife or the Scottish Government is talking nonsense becomes hard to refute. The sad reality is that Fife's original calculation is unsound, and that the latest conclusion is not based on any calculation at all. The figure of 35,200 is now being endorsed simply because it suits the broad-brush political arguments. It is evidently of no interest that the underlying science is unreliable. Nevertheless it is a distressing new development with these Modifications that it is not thought necessary to offer the public any supporting calculations. At two earlier stages of the Structure Plan process, we spent long hours, using on each occasion the most recently available statistics, deriving a figure for the housing land requirement that was soundly-based. It is an arrogant use of power for government to say it does not have to do likewise and that it doesn't matter that its chosen answer does not correspond to its declared premises. Are the national planning guidelines to be updated to enshrine this "Pick a number you fancy" principle?" Or would the government prefer that local authorities put in a better performance than it has managed itself?

Unreliable references

Integrity is equally lacking in the non-numerical sections of the Modifications to the Structure Plan and the Strategic Environmental Assessment (SEA). The reader is supposed to believe that any statement that quotes an earlier document should be regarded as absolute, particularly if a hierarchy of documents built on earlier documents can be established. No thought is given to whether the original document at the base of this house of cards itself lacked legitimacy or was contrary to all accepted belief at the time. For instance, the notion of St Andrews as an "economic driver" for Fife and Scotland can be traced back to the first draft of the National Planning Framework, on which the town was never consulted. The SEA in turn relies on Fife's recent flawed landscape appraisal, which turned on its head all previously understood wisdom about the relative merits of the various landscapes surrounding the town.

Selective application of planning policies

The manner in which national planning policies are applied is also highly selective. The authors of the Modifications hide behind SPP3 when attempting to justify their arbitrary choice of 35,200 for the housing land requirement. Yet they are happy to brush aside the guidance in SPP3 on the length of the precise planning horizon. The previous version of SPP3 said that, in Structure Plans, precise prediction of the housing land requirement should only be attempted up to a 12 year horizon rather than a 20 year one. The latest SPP3, framed in the context of Strategic Development Plans, makes remarks of a similar flavour.

Lack of robustness

The credit crunch will also expose dramatically the folly of attempting long-term precise planning. If planning over a twenty year horizon can be done with any credibility at all - and to anyone with any vision that must surely now look highly questionable - a basic requirement is that the methodology used must be robust. The population projections produced by the General Register Office for Scotland (GROS) are certainly not fit for that purpose. GROS candidly acknowledge that these projections are merely extrapolations of very recent short-term trends. It is a great pity that the GROS demographers appear unable to prevent the flagrant misuse of their statistics by colleagues within the Scottish Government. The Modifications are able to assume a misleading air of moderation in indicating that the housing land requirement is less than would be implied by use of the 2006 household projections, but the chosen figure is only moderate by comparison with the absurd.

In a couple of years time, those who have pretended that GROS extrapolations can be regarded as forecasts are likely to look very silly indeed. In all probability, the credit crunch will have halted the housing boom in West Fife, the supposedly unstoppable inward migration will have ceased, and, if GROS persist with their current use of short-term data, the population projections will come plunging down. We do not anticipate that this will produce any penitence on the part of those who have

misrepresented the role of the GROS projections. In development promotion, the prevailing philosophy appears to be that the ends justify the means.

Strategic Land Allocations

We would stress that we remain completely opposed to the notion of Strategic Land Allocations (SLAs), and continue to believe that the Structure Plan should restrict itself to determining housing shortfall at HMA level, with detailed site selection left to the Local Plan. The process of selecting specific SLAs can only be justified on the basis that planners in Edinburgh and Glenrothes can display greater wisdom than that which would emerge from the Local Plan process. Our impression from the Modifications and the SEA is that there is little wisdom at strategic level, and the evident ignorance of local circumstances leads to a cavalier disregard for the likely consequences.

St Andrews West

We have highlighted in our response to the SEA on the Modifications the word-game that is being played with the name of the Strategic Land Allocation for St Andrews. However much the Scottish Government may maintain that St Andrews West is an as yet undefined geographical area, there can be little doubt that in the minds of the Fife planners it is synonymous with the previously proposed “western development” for the town. If the western development goes ahead, it will cause irreparable damage to the landscape setting of St Andrews, which not even the endless references to mitigating measures will be able to heal. It has been widely recognised for the last 20 years that a much better environmental option is limited development in the Kinness valley. It is no coincidence at all that the recent review of local landscape designations in Fife, paid for by Fife Council, removes the obstacles to the western development and, amazingly, attempts to preclude the use of the Kinness Valley.

If the Scottish Government is not party to these cynical manoeuvres, it can at least do a respectable job of writing the Modifications to the Structure Plan. It is not acceptable in a document of this type for concepts to remain undefined. If the Government is determined to impose Strategic Land Allocations on us, and wishes to leave the exact location of St Andrews West to Fife Council, there is no excuse for not specifying precisely the parameters within which that decision is to be taken. Planning cannot be conducted on a “we all know what we mean” basis when so little heed is paid to popular opinion. For the avoidance of doubt, the Modifications should indicate that St Andrews West includes the Kinness valley, and, by words or map, indicate the maximum acceptable extent of the SLA

Unsatisfactory consultation practices

The Structure Plan process has been characterised by many attempts to make life hard for potential objectors. The present consultation, in which only two documents have been put for comment at the same time, must be regarded as a small improvement compared to Fife's practice, where at one stage we had six, but is clearly not intended to aid detailed examination. It does not help the public that in one of the documents, the SEA, the abbreviation SLA is used to mean Special Landscape Area, whilst in the other, the Modifications, it means Strategic Land Allocation. Moreover St Andrews and N.E. Fife is a misleading label for the HMA covering the town due to the confusion with the name of the former District Council. It leads casual readers to believe that the proposed housing is for a much larger area than is the case. It would also be a novel experience for us if major planning consultations were launched at times other than the beginning of the school holidays or shortly before the Christmas break.

Yours sincerely,

I.B.J. Goudie
Vice-Chair