



Royal Burgh of St. Andrews Community Council

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Ms P Ewen
SDPA Manager

15 July 2010

Dear Ms Ewen,

Response to the TAYplan Main Issues Report

We welcome the recognition in the Executive Summary of the Main Issues Report that “climate change is the single most important issue facing mankind”. This realisation implies that a radically new beginning is required at the present time. Whilst we acknowledge that the Report contains a range of useful ideas in this regard, we are not persuaded that it is consistent in giving carbon reduction the pride of place that this premise should imply. Perhaps more astonishing is the failure to appreciate that the recession has changed the economic landscape and hence the future demography. We do not accept that the “2006-based population projections are a realistic basis from which to plan” (para. 4.9). They have become a quaint relic of a bygone age.

The Outlook for Scottish Government Expenditure report produced this month by the Office of the Chief Economic Adviser suggested that “it may take until 2025/26 for the Scottish Government Budget to return to 2009/10 levels”, and that the cumulative loss of expenditure over that period could be approximately £42 billion. It will obviously be some time before it becomes clear what exactly this means for the Scottish Economy, but the notion that it implies business as usual is scarcely credible. This, however, is precisely the assumption on which the demographic extrapolations by the General Register Office for Scotland (GROS) are based. Their projections will not, of course, be technically wrong as they are always careful to state in the small print that they are not making predictions. Too often, however, strategic planning documents in their introductory sections have re-iterated the caveat that projections should not be treated as predictions before going on to do precisely that. It has been said that the £42 billion cut-back implies “significant challenges” for Ministers. It also implies significant challenges for demographers at GROS and for local authority planners.

Our answers to the specific questions in the consultation are as follows:-

1. The Main Issue D considers two options for population and housing growth. Which option do you think the Proposed Plan should include?

~~Option 1~~ ~~Option 2~~, Another Option, ~~No Opinion~~

We certainly do not subscribe to the belief that it is possible to produce worthwhile population estimates over a 20 year period. Clinging to this belief in the light of the recession would look heroic were it not so misguided. We are therefore opposed to any intention to use such estimates to determine a Housing Land Requirement over a period of this length.

Writing in November 2007 about the Housing Land Requirement Reappraisal (HLRR07) of the Fife Structure Plan, we said,

“Of our various concerns about the methodology used in HLRR07, the failure to abide by central government advice on the planning horizon remains one of the greatest, given its major impact on the figures. We noted last year that SPP 3, para 61, says, “**The structure plan should identify the overall housing land requirement for a period of 12 years from the plan’s expected date of approval**”, and that the same wording is repeated in PAN 38, para. 10. Para. 15 of PAN 38 goes on to say

“Beyond year 12, the emphasis should be on giving a broad indication of the scale of the requirement rather than firm figures”. Para. 61 of SPP 3 also requires the housing shortfall for the first 12 years to be split into two phases. Para. 9 of PAN 38 notes that “SPP 3: *Planning for Housing* indicates that structure plans should where possible provide guidance on the scale and distribution of housing land provision over 20 years”. It goes on, however, to declare unequivocally that **“housing land requirements cannot be determined with precision for such an extended period”**.

The wisdom of these various bits of central government advice should now be all the more apparent. Indeed in the light of recent events, questions should be being asked on whether even a 12 year planning horizon is viable.

If a 12 year planning horizon were adopted, this Community Council would be more supportive of the broad philosophy of Option 2 than that of Option 1 : we endorse the goal of halting the decline in the population of Dundee. Option 2 as it stands, however, is not coherent. Para. 4.1 notes that “Dundee has seen population move to its surrounding authorities within TAYplan.” Option 2 seeks to reverse the decline in Dundee’s population, in the belief that some of the change can come from inward migration, but also that (para. 4.12) “some of this growth will come as fewer people leave Dundee City.” So the aim is that part of the reversal in Dundee’s fortunes comes from stopping the haemorrhaging of its population to Angus, East Perthshire and North Fife. Logic therefore dictates that levels of inward migration to these surrounding areas will be correspondingly reduced. Thus it is obviously inappropriate to extrapolate the same rate of growth as before.

2. The housing land figures are presented as ranges. Do you think the upper range in the option you chose for Question 1 are deliverable given the present economic climate and should they be higher given the recent 2008-based population projections?

~~Yes~~ , No, ~~No Opinion~~

To try to dance to the tune of the 2008-based projections is akin to gathering your orchestra on the deck for one last defiant performance while the boat sinks. It is not in touch with current realities. Indeed, if the Office of the Chief Economic Adviser is correct in saying that the effects of the recession may still be being felt in 2026, the first of these questions should now be whether even the *lower* end of the range of expected annual build figures is achievable by 2032.

We have already acknowledged that there is a “significant challenge” here for planners. With the current methods of projection, the realities of the post- credit crash world will only start to appear in the 2010-based projections, with the full effects only becoming evident later still. If TAYplan is to progress according to the desired timetable, you will need to tear up the traditional manual and produce a new methodology that is sufficiently robust to cater for the current harsher economic realities.

3. Several key actions could be in the Proposed Plan to support the growth of the economy; do you agree with these:

- i. Identify the need for a new strategic employment site at Forfar as an agricultural service centre
- ii. Identify the need for a new strategic employment site at the Scottish Crop Research Institute, Invergowrie for food research
- iii. Protect Dundee and Montrose Ports for port related uses only

~~Agree, Disagree,~~ no opinion, ~~other~~

4. Do you agree that the retail hierarchy in Main Issue F is the right one to deliver Scottish Government objectives to concentrate comparison goods retail in town centres?

We would welcome clarification of the policy implications of the defined hierarchy.

5 Do you agree that the Proposed Plan should require Local Development Plans to identify a supply of effective employment land?

The requirement should not be simply to identify a supply of effective employment land, but rather to identify a supply that, in areas where appropriate records exist, is justifiable in terms of past history. Where employment land has lain unused for years, it is not acceptable for the development plan to designate further huge areas for this purpose - as is currently proposed in St Andrews. A designation as employment land should not be used as a first step towards a housing land designation.

6 In order to reduce resource consumption in development do you think the Proposed Plan should require high resource efficiency standards in development and that TAYplan should work with local authorities to develop a consistent framework for these requirements?

Agree, ~~Disagree, No opinion~~

If agree – what should it consider?

Consideration of the orientation of buildings to maximise solar gain.

7. The Proposed Plan could require the designing-in of waste collection/management for new development to be agreed between the local authority and the developer/operator. Should the Proposed Plan adopt this approach?

Yes, ~~No, No comment~~

8. How can the Proposed Plan best protect prime agricultural land to support food security whilst allowing some development at the edge of towns?

By imposing a ceiling on the proportion of the land scheduled for development in Local Development Plans that can be prime agricultural land.

9. Do you think that the Proposed Plan should set out a framework to ensure that renewable energy and waste management development are located in the most appropriate locations?

Yes, ~~no, no opinion~~

If yes, what practical considerations do you think this should include?

Protection of the landscape settings of towns and of the unbuilt coast.

10. Do you think paragraph 8.2 sets out the right objectives for the vision?

~~Yes, no, no opinion~~

We certainly endorse the challenge of “Recognising that some places (built, cultural, natural heritage) are of international and regional significance and respect their quality and character in how they develop.” The associated objective should be simply “Protecting and enhancing the character and quality of these places”. We would thus delete the words “as economic drivers” from the end of this objective. Experience suggests that the quality and character of places is only respected when they are valued for their own sake. As soon as they are seen as economic drivers, short-term monetary gain brushes respect aside.

11. Do you agree with the proposed vision?

~~Agree, Disagree, No opinion~~

We do not believe that the main goals of this plan should rest on the “growth of Dundee city region”. Leaving aside the possible interpretation in terms of territorial aggrandisement, growth in terms of population as a result of increased fertility rates is likely to be at most a very minor factor. If there is population growth, which now appears much less likely than before the recession, the largest component could well be acquisition of population from the west of Scotland. We should not be attempting to deprive authorities in the west of a sustainable future of their own.

12. Do you agree that the settlements identified in figure 9.1 are the region’s Principal Settlements?

We do not wish to challenge the list of Principal Settlements, but the hierarchy set out in Fig. 9.3

shows confused thinking, essentially because it purports to classify by two variables simultaneously. The basic point under discussion here is the amount of new development, over and above existing allocations, that can be accommodated within each settlement, and that has no direct relationship to whether the settlement will or will not make a major contribution to the regional economy. St Andrews will clearly make a major contribution to the regional economy, but it has already been acknowledged (para. 9.9) that “Beyond existing proposals in and around St Andrews development pressures would be directed away from St Andrews”. So whilst St Andrews may be a Tier 2 settlement in terms of its contribution to the regional economy, its very limited capacity for absorbing any further new development – which is, after all, the relevant question as far as TAYplan is concerned – should place it on Tier 3, the lowest tier of developmental priority.

13. Which Spatial Strategy Option do you think the Proposed Plan should include?

Both the proposed spatial strategies would appear to us to be too rigid. In broad brush terms, we support focussing development on Dundee and Perth, and recognise the environmental arguments for not spreading the latter along the Carse of Gowrie. Development in the Carse is, of course, of no direct relevance to St Andrews, but the general principles here are. The restriction of development to principal settlements is well-meaning, but overlooks the potential environmental benefits of retaining or restoring the viability of rural communities. It may be, for instance, that limited development in villages in the Carse, or indeed around St Andrews, may maintain the viability of village facilities and avoid the need for unnecessary car journeys to the neighbouring major town. In some places in the TAYplan area, limited village development, coupled with a developer contribution, might facilitate, for instance, the re-opening of a railway station. A more flexible approach, coupled with realistic assessments of gains and losses in terms of climate change, might yield dividends.

14. Main Issue N sets out priorities for sequencing the release of land for the TAYplan area. Do you believe:

~~The order is correct~~, An alternative order should be adopted, ~~No Opinion~~

As with question 13, we see the proposed sequence as too rigid a straitjacket that could exclude proposals that would be very beneficial in reducing carbon emissions. This Report accepts too meekly that significant improvements in transport infrastructure lie outwith local control. This Community Council has long supported the reinstatement of the rail link to St Andrews. In view of the lack of interest amongst Fife’s transportation officials, for some time the most likely model for achieving this has been the methodology advocated by Prof. George Hazel, based on securing contributions from private developers who can expect to recoup their costs due to the enhanced value brought to their developments by the presence of the rail line. Given the sensitivity of the St Andrews planning context, such an approach would require judicious application in our context.

Whilst there are clearly better times than in a recession for pursuing such a strategy, we need a planning framework that does not close the door on such possibilities. More generally, the sequence spelt out in Main Issue N should give high priority to development proposals that can supply solid evidence that they will assist in the reduction of carbon emissions, provided that they are also compatible with the other environmental protection goals of the plan. In other words, if the underlying aim is to address problems of climate change, it is better to make that explicit rather than to rely on subsidiary criteria which seek to achieve that end but which may in practice be found wanting.

The bottom end of the proposed priority scale suffers from unnecessary amalgamation. We would support a general presumption of favour the expansion of existing settlements in preference to creating new ones.

15. Do you agree that the following issues do not need to be covered by the Proposed Plan?

Affordable Housing

~~Agree~~, Disagree, ~~No Opinion~~

This proposal looks like an abdication of responsibility. After the Report has acknowledged in para. 4.6 the huge scale of the problem, it cannot then wash its hands of the matter. We would not dispute that required proportions of affordable housing vary between areas and that these proportions should be set by Local Development Plans. Nevertheless we look to the strategic plan to provide a robust general framework.

There is more than an element of farce about a system that does not disaggregate the housing need. It would be seen as ridiculous if the NHS were to identify a need for more hospitals due to the rising number of elderly and then respond by building maternity units. Yet we have had for years a system under which demand for affordable housing in St Andrews is used to boost the housing land requirement before allowing most developers to respond by building mainly or exclusively top-of-the-range properties. We will only see progress when Local Development Plans are required to disaggregate the housing land requirement by both tenure and house size.

Our experience in St Andrews, which we would expect to be replicated in various other places, is that developers will seek to avoid providing affordable housing by using every available loophole. We therefore seek policies that

- (i) severely curtail the circumstances in which developers can make monetary contributions in lieu of actually providing the housing;
- (ii) cease to exempt small sites from the need to provide affordable housing, but rather require such housing to be built whenever the stipulated number of units rounds to one or more;
- (iii) preclude sub-division of sites as means of circumventing the need to provide affordable housing;
- (iv) require the affordable housing elements of developments to be built first or to be built according to an agreed phased programme.

Minerals

~~Agree, Disagree, No Opinion~~

Wind Energy

~~Agree, Disagree, No Opinion.~~

c.f. question 9.

16. If there are other main issues which are strategic and cross boundary that you feel the Proposed Plan should cover please tell us what these are and how you think it should consider them?

Green Belts

Para. 3.7 of the Report is incorrect when it says “There are presently two Green Belts in the TAYplan area at St Andrews and Perth.” Designation of a Green Belt for St Andrews has been a Structure Plan requirement since 2002, but Fife’s ill-advised decision to embark on a further Structure Plan revision has meant that we do not yet have an established Green Belt. As it remains possible that this will continue to be the case when TAYplan becomes operative, we would wish the requirement for the Belt to be restated in the strategic planning document.

Safeguarding Land

At a time of expenditure cut-backs, it is all the more important to safeguard appropriate land for certain types of infrastructure project until such time as funding is likely to be available. Particularly important is land relevant to projects that would assist in combatting global warming. These include potential routes for rail lines and cycle paths. Local Plans should be required to identify and protect appropriate land.

Protection of the Coast

We have previously commended the following wording taken from the Edinburgh and Lothians Structure Plan;- “Local plans should define the detailed boundaries of the developed and undeveloped

coast. Development on the developed coast will be supported where it demonstrates a need for a coastal location, or contributes to the renewal and regeneration of an area. Development on the undeveloped coast will only be permitted where it demonstrates a need for a coastal location, that the benefits outweigh any detrimental environmental impact and that there is no alternative site”.

Communications Technology

We wish the plan to include guidance on the siting of mobile phone masts in view of the mounting evidence of the deleterious effects of exposure to electromagnetic radiation.

Yours sincerely,

Ian Goudie

Chair

Royal Burgh of St Andrews Community Council