

**THE THREE AYRSHIRE COUNCILS AND
THE JOINT STRUCTURE PLAN TEAM**

**AYRSHIRE JOINT STRUCTURE PLAN 2025
SUSTAINABILITY APPRAISAL GROUP**

FINAL REPORT, FEBRUARY 2006

Introduction

1. This report sets out the outcome of the sustainability appraisal conducted alongside the preparation of the Finalised Draft of the Ayrshire Joint Structure Plan 2025. The Finalised Draft, "Growing a Sustainable Ayrshire: Ayrshire Joint Structure Plan", was approved by the Ayrshire Joint Structure Plan and Transportation Committee on 20 January 2006, and is in the process of being submitted to Scottish Ministers for approval.
2. The aim of the appraisal was to ensure that the new structure plan accords with good practice and to ensure that policies were developed in a robust manner. In particular it sought to assess the emerging plan from a perspective which promotes a joined-up approach to economic, social and environmental policies. It was not a Strategic Environmental Assessment (SEA), though the approach adopted had much in common with the SEA process.
3. It was conducted over a two-year period from December 2003 by a Sustainability Appraisal Group established by the structure plan team. This was a significant innovation. The 15 members of the Group were drawn from a wide range of agencies and interests in Ayrshire, including business and enterprise, community planning, and environmental bodies, together with an independent facilitator and adviser (the membership is set out at Annex A). The appraisal was undertaken in tandem with the plan preparation, working alongside and interacting with the plan team, and it added a significant additional channel of participation. As a result it has been an iterative process designed to assess if the plan adequately addresses sustainable development.
4. This final report sets out the Group's overview of the Finalised Structure Plan. It explains how its work evolved alongside the plan, and presents the appraisal and commentary on the plan's policies. The report then makes suggestions on how to take forward monitoring and review in support of the plan, before concluding with an evaluation of the appraisal process.

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Overview of the Finalised Structure Plan

5. The Finalised Plan reflects well the spirit of discussions held with the Group in terms of its structure, content and approach. In their view much progress has been made, and it incorporates many of the Group's suggestions. The overall structure and policy framework is more coherent and accessible than the Consultation Draft, making it easier to understand and more useful; it also has substance.
6. The key strengths from a sustainable development perspective include:
- Setting an explicit sustainable development framework in STRAT 1 and its Schedule 1, and this tracking through in many of the policy topics.
 - The clear Development Framework focussing on the 3 main towns, promoting their inter-dependence, identity and the corridors between them, but also enabling development within smaller communities and rural diversification.
 - The decisions to seek to retain existing population levels and to support regeneration.
 - The rationalisation of existing strategic business locations, with the inclusion of town centres and reallocation of surplus land.
 - The promotion of the knowledge and environmental economies.
 - The preference for the use of brownfield sites.
 - The retention of the Green Belt, and its assimilation as part of a wider Green Network.
 - Commitment to the Water Framework Directive.
 - The emphasis on public transport, and recognition of the need to improve the rail network.
7. The key cautions are:
- Schedule 1 ought explicitly to apply to development control as well as to local plans. For the Schedule to work effectively and consistently requires further guidance: this could be through supplementary planning guidance or the proposed Action Plan.
 - The topic of greatest difficulty to resolve has been the selection of locations for the housing land release and the guidance for masterplans for significant releases. The improvement to COMM 3, which requires masterplans to incorporate the principles of Schedule 1 for such releases, strengthens the need for guidance on the interpretation of the Schedule. Land release should also be guided to appropriate locations by the operation of ENV 3 and ENV 4.
 - There is some inconsistency in the application of criteria to policies. For example there are explicit criteria for all mineral workings (ENV 14), but with several other policies similar criteria are missing: these include: ECON 1A/C and 7A, and in TRANS 3 and 5, for example.
 - Promoting more travel by air and by car will lead to environmental damage; in this context, the policy support in ECON 1B for expansion of Prestwick (noting this is UK policy) and in TRANS 3 for road infrastructure (albeit modest) is unlikely to be sustainable.
 - It is crucial that the Implementation partnerships deliver the resources needed for public transport, water infrastructure and affordable housing.
8. A main theme of this appraisal has been that the extent to which the plan enables more sustainable development to take place will be **how** its policies are implemented. A key aspect of this will be to regularly monitor and then review progress.

Evolution of the Plan and its Appraisal

9. The appraisal was carried out by the Group over a considerable period, and the process was governed by working alongside the structure plan team. To be able to understand how the Group went about its task, it may be useful to set down how the work unfolded. A table showing the timeline of the work of the Group and the stage reached by the Structure Plan is set out overleaf.

10. The Group's initial meetings at the turn of 2003/4 clarified views on the new Structure Plan and its relationship to sustainable development. This enabled initial criteria for assessing the plan and its policies to be devised. Central to the criteria were:

- Encouraging proximity and accessibility, i.e. jobs, housing, shopping and services should either be near one another or readily accessible; and
- Safeguarding the environment and securing the wise use of resources.

11. The Group agreed with the agenda of six key issues identified in the public consultation leaflet issued by the Joint Committee: a Future for Communities; Economic Prosperity; Housing Land Investment; Transport and Public Sector Infrastructure Support; A Green Future; and Rural Ayrshire.

12. At meetings in March and May 2004, the Group took into account at length, and then adjusted to, the new strategic preference to centre the new plan on the retention of existing population levels. The decision to not plan for a decline in line with the Registrar General's forecasts for a 30,000 decline over 20 years had a wide-ranging impact, though the Group was concerned it should not displace the full agenda of key issues.

13. The initial reaction was that this strategy would generate far more development than would otherwise be the case. This, when combined with the house building required because of the decline in household sizes, would mean that the same population level would give rise to significant extra infrastructure requirements and associated resource use. This would seem to be moving away from, rather than towards, sustainable development.

14. On reflection the Group came to a different view. There were two main reasons for this (summarised in the Group's Interim Report which sets out the full analysis):

- "Retaining population at current levels is consistent with maintaining current levels of social and community facilities.... Conversely, loss of population would lead to the loss of at least some facilities, almost certainly with some geographic concentration and potentially adversely affecting disadvantaged communities more than others.
- If the population is not retained in Ayrshire, it will be because it has moved elsewhere. This will either be to other parts of Scotland (likely to be to those areas already experiencing population and growth pressures – the belt from Stirling to East Lothian), or outwith Scotland (contrary to national policy objectives)."

Timeline of the Structure Plan and the work of the Group

Sustainability Appraisal Group Meetings	Sustainability Appraisal Group - Main Activity	Structure Plan Progress
		November 2003: Plan preparation initiated; publication of issues leaflet
17 December 2003	Group formed initial views on content of plan and initial criteria for assessing sustainability	Preparation of Consultation Draft underway
12 January 2004		
19 March 2004	Briefing and debate on new key issue of population retention	26 March 2004: Consultation Draft approved by Joint Committee
21 May 2004	Presentation on, and Group response to, emerging Consultation Draft	3 Ayrshire Authorities approve consultation
		18 June 2004: Public consultation on Consultation Draft for 10 weeks
13 October 2004	Preparation and submission of Group's Interim Report to Joint Committee	3 December 2004: Joint Committee note content of Group's Interim Report
18 April 2005	Update on evolution of the Plan; debate on how to take sustainability appraisal forward; and revision of criteria	Work continuing on topics including waste, water, windfarms and access
13 June 2005	Working session on monitoring & indicators	
	Circulation of 'Route Map' on how to complete appraisal	2 December 2005: revised Structure Plan to Joint Committee
13 December 2005	Briefing on, and responses to, the revised Structure Plan	20 January 2006: Joint Committee approve Finalised Draft Plan
	February 2006: Preparation and submission of Final Report	

15. However, the Group remained exercised about two facets of the emerging Consultation Draft. Although satisfied that retaining population would be the more sustainable option, the extent of housing land release has significant sustainability implications. They were also concerned about the policy format of the Consultation Draft, both in terms of its reduction to a very limited number of strategic policy statements, and that neither sustainable development overall, nor the environment in particular, came across as pervasive themes influencing all aspects of the plan.

16. These, and other detailed comments, were consistent with the responses arising from the wider public consultation. As well as expressing its concerns, the Group also supported the spatial strategy proposed in the Consultation Draft and made a number of positive suggestions. These related to how to make sustainable development more central to the plan, and to topics including transport, energy and waste. All this was set out in an Interim Report which was submitted to the Joint Committee.

17. While the plan was being revised, the Group took stock of and revised its own appraisal criteria. It also looked ahead to monitoring and review, in particular how to build on the work of the Ayrshire Monitor reports. The Group decided that the questions to ask when the finalised draft plan became available would be:

- Is sustainable development embedded as the rationale for the Structure Plan?
- Are the strategy and policies of the Plan sound in terms of sustainable development?
- Does the Plan contain sufficient sustainable development guidance for Local Plans and development control? and
- Can the appraisal propose a framework for monitoring?

18. When the finalised draft became available, a briefing paper was prepared, giving an initial assessment from a sustainable development perspective. The Group then had a final meeting to receive an update on the revised plan and to discuss their reactions. The meeting was very positive, and welcomed the extent of change, which it was felt was in line with and met many of the comments from the Group. The Group then made further suggestions outlining their remaining concerns and where they saw potential for improvement, and the final report has been drafted in the light of these.

19. This report seeks to bring together aspects of the Group's work for the first time. Now that the finalised policies have been approved by the Joint Committee, it has been possible to assess these policies using the appraisal criteria devised by the Group, and taking into account the Group's comments on the plan's policies. The next section of the report sets out how this was carried out, and what the outcomes were.

The Appraisal: Criteria, Matrix and Commentary

Appraisal Criteria

20. As described above, the initial meetings of the Group devised a provisional list of criteria for appraising the policies in the plan, and were therefore known to the plan team from the outset. This list was included in the Interim Report which commented on the Consultation Draft of the Plan. Following further comments from Group members, the criteria were then revised in April 2005, while work was underway by the plan team on the Finalised Draft of the structure plan.

21. This revision took into account:

- The criteria used in the Interim Report for assessing the implications of setting out to retain Ayrshire's current population level;
- The indicators used in Ayrshire Monitor 2004;
- The criteria used for urban expansion (in the new Structure Plan being prepared for Glasgow and Clyde Valley) and for the location of new development (in the Local Plan being prepared for North Lanarkshire Council); and
- A case study example set out in the Tyldesley Report (2003)

22. None of the 12 criteria were changed, but several were refined. Also, rather than present them as separate categories - economic, social justice and environmental - they now form one set of sustainable development criteria. The revised criteria are set out below.

Sustainable Development Criteria for Structure Plan Policies

Job Opportunities

- Does the policy support the creation of opportunities for access to jobs?

Retain People

- Does the policy support development to encourage people to live and work in Ayrshire?

Infrastructure Support for Strategy

- Does the policy support the provision of new or improved infrastructure to support the Development Strategy? [*subject to the strategy reflecting sustainable development and being set out in the plan*]

Strategic Locations (& co-location)

- Does the policy guide development to take place in strategic locations, and related activities to be located together?

Tackling Disadvantage

- Does the policy assist local communities, particularly tackling disadvantage, renewal priorities and inequalities?

Accessibility & Sequential Approach

- Does the policy promote greater accessibility to services and facilities, and the sequential approach to development decisions including:
 - for transport (in accordance with the priorities in SPP17 of walking, cycling, public transport and motorised modes); and

- for town centres (in accordance with the locational preference of draft SPP8 for town centre, edge-of-centre, then out-of-centre development)?

Community Facilities

- Does the policy contribute to supporting or enhancing community facilities, and contributing to community health and safety?

Housing Need

- Does the policy contribute to meeting all housing needs including affordable housing?

Resource Use Efficiency

- Does the policy promote the efficient use of resources, including:
 - Reducing greenhouse gas emissions; energy efficiency; SUDS; waste minimisation;
 - Re-use of existing infrastructure, services and transport provision; and
 - Promoting brownfield site development? [*Note: this is subject to the rationale that this is appropriate where it reinforces renewal priorities, accessibility, and the wise use of existing transport and services; and contributes to environmental protection and enhancement*]

Environmental Resources

- Does the policy support the enhancement, renewal and protection of environmental resources (including the precautionary principle; and the polluter pays principle)? [*Note: this applies to the whole range of environmental resources, which should include biodiversity, designated areas & sites, non renewable resources, landscape, and cultural heritage*]

Environmental Quality

- Does the policy support the restoration or improvement of air, water and land quality?

Environmental Capacity

- Does the policy address the capacity of the environment to absorb development (including cumulative capacity and townscape/landscape assessment)?

23. The criteria devised by the Group have now been used to compile a Sustainability Appraisal matrix. This is set out overleaf. The matrix could only be developed at a late stage in the process, and was devised by the Group's facilitator when the full range of policies in the Finalised Plan became available after their approval by the Joint Committee on 20 January 2006. However, the assessment aims to reflect the Group's evaluation of the plan's policies, particularly from and after the December 2005 meeting of the Group.

24. The name of each criterion is used in the matrix tables, and the explanatory text is expressed as a question which has been applied to each policy. In practice, most of the criteria proved to be clear and straightforward to use. The one area of difficulty was distinguishing between the three environmental criteria – Environmental Resources, Environmental Quality and Environmental Capacity – where care had to be exercised to apply them consistently.

AYRSHIRE JOINT STRUCTURE PLAN 2025 - SUSTAINABILITY APPRAISAL GROUP
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SUSTAINABILITY APPRAISAL MATRIX

Structure Plan Policy	Job Opportunities	Retain People	Infrastructure Support for Strategy	Strategic Locations (& Co-location)	Tackling Disadvantage	Accessibility & Sequential Approach	Community Facilities	Housing Need	Resource Use Efficiency	Environmental Resources	Environmental Quality	Environmental Capacity
STRAT 1 Sustainable Development	#	#	+	+		+	+		+	+	+	+
STRAT 2 Development Framework	+	+	#	+		#		+	#			+
ECON 1 Gateway Locations - Hunterston	#		+	+		+			+	?		
ECON 1 Gateway Locations - Prestwick	#		+	+		+			?	?	?	-
ECON 1 Gateway Locations - Ports	#		+	+		+			+	?		
ECON 2 Strategic Business Locations	+	#	+	+	#	+			+			
ECON 3 - Local and Other Business Opportunities	+	#	#	#	#	+			#			#
ECON 4 - Reallocation of Surplus Industrial Land	#		#	#		#		#	+		#	
ECON 5 Knowledge Economy	+	+			+	+			#			
ECON 6 Renewable Energy	#		#						+	+		+

Structure Plan Policy	Job Opportunities	Retain People	Infrastructure Support for Strategy	Strategic Locations (& Co-location)	Tackling Disadvantage	Accessibility & Sequential Approach	Community Facilities	Housing Need	Resource Use Efficiency	Environmental Resources	Environmental Quality	Environmental Capacity
ECON 7 Wind Farms			#						+	+?	?	+
ECON 8 Biomass	#			+		#			+	+?	#	#
ECON 9 – Strategic Waste Management Facility	#		#	+					+	?	?	
ECON 10 Waste Locations				+		+				?	#	
ECON 11 – Environmental Business Village	+			+	#			#	+	+	#	#
ECON 12 The Tourism Resource	+	#							?	+		?
ECON 13 Tourism Opportunities	+	#							?	+	?	
ECON 14 Rural Diversification	+	+	#	+	+	+	#	+	+	#		L
COMM 1 Regeneration	#	+	+	+	+	#	#	#	#	?		
COMM 2 Housing Investment	#	+	+	+	#	?	?	+	?	?	?	?
COMM 3 Housing Land Release		#	+		#	+	+	+	+	+	#	
COMM 4 Affordable Housing		#			+			+				
COMM 5 Housing in the Countryside	+	+	+	+	#	#		+	L	L	L	

Structure Plan Policy	Job Opportunities	Retain People	Infrastructure Support for Strategy	Strategic Locations (& Co-location)	Tackling Disadvantage	Accessibility & Sequential Approach	Community Facilities	Housing Need	Resource Use Efficiency	Environmental Resources	Environmental Quality	Environmental Capacity
COMM 6 Town Centres	#	#	+	+	#	+	#	+	+			#
ENV 1 Landscape Quality		#								+	+	#
ENV 2 Landscape Protection		#								+	+	+
ENV 3 – Core Investment Area Landscape		#		+					#	+	+	+
ENV 4 Green Network	#	#		+		#	+		#	+	+	+
ENV 5 Woodland and Forestry	#						#		#	+	+	#
ENV 6 Protection of the Built Heritage									+	+	+	
ENV 7 Natural Heritage Designations										+	+	#
ENV 8 Flooding										+	+	#
ENV 9 Water Framework Directive									+	+	+	#
ENV 10 - Integrated Coastal Zone Management	#						#			+	+	
ENV 11 Air, Noise and Light Pollution										+	+	#
ENV 12 Mineral Resources	#								+			#

The Sustainability Appraisal Matrix

Interpreting the Matrix

25. The matrix presents the outcome of testing each of the policies in the Finalised Structure Plan against the questions posed by the 12 sustainable development criteria. The analysis is based on the exercise of judgement and experience, drawing extensively on the views expressed by members of the Group.

26. The matrix shows all the policies in the order in which they appear in the plan. These cover six categories: the strategy (delivering the vision); economy; communities; environment; transport; and implementation. In a similar way, the sustainable development criteria move from economic criteria on the left of the page, social in the centre, to environmental on the right. An assessment has only been given where the policy is thought to impact on each criterion: a blank does not mean it has been overlooked. As a result, the table is able to illustrate the extent of joined-up thinking which is embedded in the plan.

27. The scores shown on the table aim to distinguish between where a policy gives explicit and implicit support for the question posed by the criteria, and where the implications are uncertain or negative. All policies where there are negatives or question marks are discussed in the commentary below; because it is directly based on the Group's comments, the commentary takes precedence over the table. The assessment has been based primarily on the wording of each policy, but where necessary reference has been made to the accompanying text.

Commentary

Overall Outcomes of the Assessment

28. What the matrix demonstrates is that the plan has an integrated and comprehensive approach, and that the plan as a whole adopts sustainable development. STRAT 1 with its Schedule 1 is a considerable strength, and is supported by other policies that tackle the six issues identified at the outset of the plan process.

29. As might be expected, the economic policies score most of their positive ratings to the left of the table, where the economic criteria are located. In addition, with the strategy focussing on a limited range of strategic business locations, adding town centres and reallocating surplus industrial land, there are also positive scores under resource use efficiency. The economic policies are also strengthened by a strong green economy dimension to the plan. This spans from support for the knowledge economy through to provision for an environmental business village, and these also see positive assessments on the right of the table.

30. The community policies, including regeneration, and to some extent also the transport policies, span across the spectrum. The plan may understate its potential contribution to tackling disadvantage. This is only explicit with regard to regeneration (COMM 1) and affordable housing (COMM 4 and IMP 3), though there are also direct benefits from promoting the knowledge economy (ECON 5) and rural diversification (ECON 14). However the development framework (STRAT 2), economic development policies (ECON 2 and 3), support for town centres (COMM 6) and for public transport (TRANS 4) are all directly relevant to tackling disadvantage.

Perhaps the greatest potential lies in ensuring that housing investment and land release (COMM 2 and 3) play their part in supporting regeneration priorities. The Group noted that much of the new housing release would be in or close to regeneration areas, though the Plan does not highlight this.

31. The environmental policies of the plan appear relatively less well integrated, i.e. they have relatively fewer explicit or implicit links to economic and social aspects. This is partly because several policies relate to relatively discrete subject areas – such as protection of the built heritage or mineral resources – and partly because some topics often located in the environment section of plans – such as waste management – have been more appropriately included within economic development. However, it serves to emphasise that policies on the landscape in the core investment area (ENV 3) and the green network (ENV 4) would be strengthened if they are also seen as contributing to economic development, and to social inclusion and health. There will be scope for this through job and training opportunities in the managing the landscape and activities compatible with its protection and enhancement, and through the provision of access and recreation facilities.

Qualifications: Air and Car Travel

32. While the overall assessment is positive, there are continuing – and predictable – reservations about policies which encourage more air and car travel, and therefore reservations about policies ECON 1B and TRANS 3. These are the two policies where the outcome would undoubtedly stress the capacity of the wider environment to absorb development.

33. The Group's interim report noted:

“30. From a sustainable development perspective, there is a continuing problem with the commitment to expand Prestwick Airport. The UK Sustainable Development Commission and House of Commons Environmental Audit Committee have both reported that UK policy for the growth of air travel, which sets the future for Prestwick, will render it impossible to meet the Government's own greenhouse gas reduction targets. However, setting aside debate about whether local economic benefits and requirements on airports to address sustainable development off-set the contribution to global climate destabilisation, this is a topic where the Structure Plan is constrained by – and has to comply with – Government Policy.

31. Therefore, while the Group has reservations about whether continued growth of air traffic from Prestwick is compatible with sustainable development, they nevertheless recognise that this is a matter governed by national policy. It is better that such air travel that does take place does so where it causes least local environmental damage. From an Ayrshire perspective, it is important to ensure that Prestwick airport is readily accessible by public transport, does not subject Ayrshire to local pollution, and that, where possible, economic development benefits accrue locally.” (Interim Report, November 2004)

34. These reservations about the expansion of air travel therefore recognise that this is a matter for UK policy. In that context, the use of spare runway capacity at Prestwick is likely to be a less unsustainable option than expansion of capacity at Glasgow or Edinburgh. The qualification in ECON 1B about measures being “taken to limit any harmful environmental consequences of the airport's operation” is welcome. This is consistent with the requirement from UK policy that Prestwick prepares a master plan to demonstrate how it is addressing local impacts of noise, air quality and surface access, in effect growth subject to the mitigation of impact.

Unlike the other two Lowland Scotland Airports, Prestwick has its approach flight paths with over the sea or sparsely populated uplands. The nearby rail service is also an asset, and could be linked to the case for links by rail across the Central Belt and to Edinburgh cited at paragraph 120 in the plan.

35. The reservations about TRAN 3 have the same underlying concern – the inevitable growth of greenhouse gas emissions which follow from investment in roads. However, the Group recognise the major shift in transport policy, with a priority for public transport and much more modest road investment proposals than in the 1999 Plan. They also recognise that the aims to improve accessibility to the south and east are legitimate and will require some road improvements, including for safety and local amenity reasons. What the Group is saying is that in terms of sustainable development, improving the rail connections for freight and passengers to Stranraer and Carlisle (in accordance with TRANS 2) would be preferable and should have priority.

36. Even with these transport policies, and most of the other policies where there are question marks, the impact in terms of sustainable development depends primarily on the **way** in which the policy is implemented and development carried out. The following sections of the report summarise the views of the Group and flesh out the appraisal matrix.

Review of Policies: Delivering the Vision

37. The Group particularly welcome seeing sustainable development as the organising principle and seeing the plan explore the complex implications in terms of community, energy and environmental stewardship. The inclusion of STRAT 1 and Schedule 1 strengthens the whole plan, though it would be helpful if this explicitly applied to development proposals as well as to the preparation of local plan policies.

38. The potential for supplementary guidance cited at paragraph 11 of the plan is noted. It would have been preferable if this had said “will” instead of “can” be introduced, and either by this means - or through the Action Plan to accompany the Plan - there should be guidance on how to use Schedule 1, in particular:

- How to combine economic, social and environmental benefits;
- How to interpret environmental thresholds; and
- How to apply the schedule to local plans and development control.

Such guidance should have regard to the EIA requirements which apply to all significant developments.

39. The Group has consistently supported the proposed spatial strategy, now set out in the Development Framework (STRAT 2). The focus is on the three towns, their town centres and the corridors between them, but also allowing scope for development within the smaller settlements and supporting rural diversification. It is not easy to imagine a more sustainable alternative.

Review of Policies: Economy

40. The Development Framework is supported by the consolidation proposed for the economic development policies (ECON 2-4). The rationalisation of existing strategic sites and recognition of the role of town centres are very positive features, with the potential for the beneficial reallocation of surplus industrial land. Alternative

uses for the latter might include greenspace: some derelict or vacant sites also have biodiversity assets and recreational potential.

41. It is important that any development of the facilities at Hunterston and other ports (ECON 1A and 1C) has regard for environmental impact, including on the marine environment.

42. The Group's discussions touched on the knowledge economy, and the policy framework of ECON 5 is welcome, including provision for a future university campus in ECON 5B. The explicit identification of the potential for the environmental economy is also very welcome (ECON 6-11). This accords with the Scottish Executive's Green Jobs Strategy as the complement to Smart Successful Scotland. It includes support for renewable energy and energy efficiency measures (ECON 6-8); provision for a strategic waste facility (ECON 9) and for an environmental business village (ECON 11), the idea for which had been advocated within the Group. Sustainable development should not focus on current issues alone and these aspects of the plan deserve recognition for engaging with future issues and innovation.

43. Again, it will be the way policies are implemented that will be critical. The Group did not object to preference of policy ECON 7 for windfarms to be sited in the Preferred Areas of Search. However, they felt the criteria of ECON 7B (and of Schedule 1) should apply to all windfarms. Similarly, while biomass was supported, the terms of ECON 8C are important as a safeguard to ensure that valued diverse habitat is not lost to monoculture energy crops. In the same vein, what will be critical with waste facilities in accordance with ECON 9 and 10 will be how sensitively they are located, designed and run.

44. Tourism is difficult to assess in terms of sustainability. Tourism depends on the environmental and cultural asset base, which the activity ought to want to value and enhance. However, if the net effect of tourism (ECON 12 and 13) is to encourage more people to travel, and to travel further and consume more, that cannot be sustainable. ECON 12 correctly points to the countervailing features to develop: environmental quality, extending the visitor season, providing job opportunities, supporting communities and encouraging rural diversity. Policy ECON 14, which addresses rural diversification directly, is important and welcome.

Review of Policies: Communities

45. COMM 1 is an important policy as it potentially binds together economic and social renewal in Ayrshire. The policy itself might have given explicit reference both to town centre renewal and to regeneration in terms of environmental quality, both of which are cited in the accompanying text.

46. The topic which exercised the Group the most was the issue of housing land release, now covered by policies COMM 2 and COMM 3. In its Interim Report, the Group concluded:

"18. ... If the land release were excessive; at low densities with high infrastructure and resource use costs; remote from community facilities, local shops, leisure and recreation; and led to a large scale increase in car based commuting, then it would be difficult to argue that what is proposed would be sustainable development. To argue otherwise, it would have to be shown that the only alternatives would have similar characteristics elsewhere.

19. The Group considers that the way in which development is carried out – its location, form, transport provision – and the extent to which it contributes to environmental quality and social justice, are all material to whether it moves towards, or away from, more sustainable development. The new housing that is provided should be where there are existing community facilities and other infrastructure and services, or new housing releases should be of sufficient scale to enable facilities and services (including public transport) to be provided with the housing development.” (Interim Report, November 2004)

47. When the revised draft plan was received, some new features of policy were supported:

- The provision for annual review of housing land supply (COMM 2B) and for programme land release (COMM 3A);
- Avoiding prejudicing the development of brownfield land (COMM 3A); and
- Giving preference to sites within communities located on key public transport corridors (COMM 3E).

48. However, as recently as December 2005, while recognising the difficulty of resolving the housing land issue, the Group was still concerned about the limited material on criteria for the selection of the housing expansion locations and to guide masterplans for significant housing land releases. It was suggested that the inclusion of these could draw on the sustainable development approach adopted elsewhere in the plan, including STRAT 1, and would strengthen it through a defence against inappropriate development of less sustainable options. It was also felt that the guidance on where development would take place was not sufficiently clear, and in particular there were no housing allocations for the 3 towns to focus and express the development strategy (as there had been in earlier drafts).

49. The approved Finalised Plan has made further progress with these policies. First, there is now a much fuller Table 3, which includes housing figures for the 3 core towns where two thirds of the new housing is to take place. Second, the earlier COMM 3E has been replaced by the new COMM 3F. This requires that in allocating sites, the three Councils shall:

“ensure that any significant new housing land release is achieved through the preparation of an appropriate masterplan incorporating the principles of Schedule 1 and seeking financial or other contributions from developers to address any shortfalls in community infrastructure and/or to mitigate against any adverse impact brought about by their development.”

50. These are considerable improvements though strengthening the need for guidance on the interpretation of Schedule 1 and requiring clarification of the term ‘significant’. **How** the housing policies work is the most critical issue for sustainable development over which the plan has direct influence. Whether housing investment (COMM 2) is effectively guided and constrained depends on the effectiveness of COMM 3 (together with STRAT 1 and ENV 3-4) as well as the quality of masterplans and development control. The Group would like to see commitment to the preparation of guidance, whether through Supplementary Planning Guidance or in the proposed Action Plan, for interpretation of STRAT 1 and of COMM 2 and 3, and to guide the preparation of masterplans.

51. It is noted that COMM 5 – Housing in the Countryside – is a policy where much of the approach is left for local plans to determine. The Group considers that in line with other policies in the structure plan, it would be valuable to encourage

innovation and low impact housing development, having regard to the factors identified in paragraph 80 of the plan.

Review of Policies: Environment

52. The retention of the green belt, and its assimilation as part of a wider Green Network, in policies ENV 3 and ENV 4 develops the framework set out in the Consultation Draft, and should be supported. In addition, the development strategy is heavily dependent on policies ENV 3 and ENV 4 providing the right framework to guide in detail where development should, and should not, take place. These policies will be crucial to ensure that environmental capacity constraints are not exceeded; they provide the framework, but how they will achieve this is not yet set out.

53. There is potential too to make more explicit the links for a Green Network to contribute to the requirements of the Habitats Directive (as noted in paragraph 103 of the plan), and to build in protection and enhancement of biodiversity more widely, and not just on a site specific basis. There is also scope for linking the Green Network to the provision of path networks cited at policy TRANS 1A. The inclusion of ENV 9, giving support for the Water Framework Directive, is welcome.

Review of Policies: Transport

54. Comment has already been made on the plan's support for expansion at Prestwick and for a modest level of strategic road investment. More generally, the Group welcome the emphasis on public transport, including recognition of the need to improve the rail network. The priority for improving the Kilmarnock rail line, identified in paragraphs 121-122 of the plan, is strongly endorsed, and could have been included explicitly in TRANS 2.

55. There is a concern that with some of the transport policies, TRANS 3 and 5 in particular, it is not clear that protection from unacceptable environmental impacts is safeguarded (though arguably this is covered by TRANS 1C).

Review of Policies: Implementation

56. All three implementation policies are vital to the delivery of key aspects of the plan – for public transport provision and water and sewerage infrastructure provision to enable housing developments to be in appropriate locations and on suitable sites (IMP1 and IMP 2), and for affordable housing (IMP 3). The Group support the Joint Committee's objective in trying to ensure adequate resources can be made available for all these aspects of the plan.

Comparison with 1999 Appraisal

57. After the matrix had been completed and assessed, comparison was made by the Group's facilitator with the Strategic Environmental Appraisal of the 1999 Structure Plan (set out in Technical Report 22B). This had been carried out in-house in 1999, with an eye to existing best practise and to future SEA requirements. The outcome of the two assessments has striking similarities, and helps to give confidence in the robustness of the current appraisal.

58. Even though the criteria used were different, and much more focused on environmental aspects, Technical Report 22B identified the following policies in the 1999 Plan with 4 or more "moving away from sustainability" scores:

- Policy ADS1 Promotion of economic development
- Policy W1 Safeguarding strategic locations
- Policy W2 Additional strategic industrial land supply
- Policy W3 Prestwick airport
- Policy W5 Tourism
- Policy E16 Mineral extraction
- Policy E17 Waste disposal
- Policy T5 Prestwick airport
- Policy T8 Strategic road network
- Policy T9 Trunk road improvements

59. This confirms that broadly similar conclusions have been reached in respect of air travel; road investment (though current proposals are far more modest); tourism; and waste disposal (though this is now set in the supportive context of the national and area waste strategies). What has changed is that the concern over large scale economic development has been replaced by concern over the potential implications of large scale house building.

60. As noted in the overview (paragraph 6), a main theme of this appraisal has been that the extent to which the plan enables more sustainable development to take place will be **how** its policies are implemented. A key aspect of this will be to regularly monitor and then review progress, and suggestions for this are set out in the next section.

Monitoring and Review

Monitor 2000 - 2004

61. Since the approval of the current Ayrshire Joint Structure Plan 1999, there has been a series of three biannual monitoring statements, the Monitor 2000, Monitor 2002 and Monitor 2004 reports. These statements are based on a consistent set of indicators to monitor structure plan policy. The set covers a range of economic, social and environmental data and they built on the strategic environmental appraisal (Technical Report 22B) that was integral to policy development, with the intention of there being a deliberate flow from assessment to monitoring. The Monitor reports established a baseline against which progress towards the aims of the plan and the wider goal of sustainable development within Ayrshire could be measured.

62. The Group assessed this approach, in particular Monitor 2004, and came to two conclusions. First, in the absence of any equivalent information source, the Monitor reports provide a sound starting point for baseline data across the policy range. They provide a substantial resource to build on and develop, not one to abandon. Second, it is useful to distinguish between the role of monitoring the structure plan policy, and assessing progress towards the wider goal of sustainable development within Ayrshire. Arguably, Monitor 2004 is currently more directed at the second of these than the first. For example, many of the indicators – extent of benefit dependency, or proportion of waste recycled – are only very indirectly influenced by the structure plan, but are material to progress towards a more sustainable Ayrshire.

Measuring Sustainable Development in Ayrshire

63. The Scottish Executive's guidance issued under statute to local authorities on the duty of Best Value explains that the requirement to contribute to the achievement of sustainable development includes:

“That ‘quality of life’ indicators are identified to measure performance in contributing to the achievement of sustainable development and reported to the public.”

64. Guidance on this requirement is currently in preparation by the Sustainable Scotland Network for the Scottish Executive. Comparison with the current draft of this guidance shows that with few exceptions, the range of topics to be covered by quality of life indicators are already well covered in Monitor 2004. The exceptions are:

- Health;
- Community Safety (e.g. crime as well as road accidents); and
- Active Civic Participation.

If these topics were added to the successor to Monitor 2004, then it would provide the basis, and a comparative basis at that, for the quality of life or performance indicators to be produced by the 3 Ayrshire Councils. It would also have the advantage of strengthening awareness of the link between the structure plan and community planning.

Monitoring Structure Plan Policy

65. The focus of Monitor 2004 is a little more patchy when it comes to the second role of monitoring progress on the structure plan. There are two topics where

progress towards sustainability and progress on implementing plan policies are in conflict. These are growth at Prestwick Airport and Trunk Road Investment. Ayrshire has seen substantial progress on both aspects, in line with structure plan policy, but neither activity will be contributing towards sustainability (as Technical Report 22B clearly predicts). They should not be recorded as such in the Monitor reports. However, there should also be scope for monitoring surface access modal share and noise impacts for Prestwick, and the construction impacts, local air quality and congestion improvements for trunk road investment.

66. It is essential to monitor progress on the structure plan, not only to be able to assess how it is performing as a whole but also to guide how some key policies – especially the release of land for housing – should operate. Some of the aspects of the new plan which require monitoring are set out below:

Objective / SP Policy	Indicator in Monitor 2004	Recommendation for Monitor 2006
Stabilise the population in 2025 at current levels	Net migration	Give more prominence and include analysis of household size
Development Framework		Add proportion of development in accordance with STRAT 2
Enable the green economy	Energy generation from renewable sources Waste recycled	Retain and add employment in the green economy
Renewal		Add proportion of housing land release / completions in or adjacent to identified renewal priorities and town centres
Environmental renewal	Vacant and derelict land; and proportion of houses built on greenfield land	Retain and add proportion of development on re-used land
Housing land supply		Add identified housing land supply (to confirm, but also constrain, 5 year supply)
Housing Land Release		Add proportion of housing land release in accordance with STRAT 1, Schedule 1, COMM 3 and ENV 3 & 4
Town Centres	Retail expenditure in town centres (including consents in and out of centres)	Retain
Minimise the demand for travel by private car	A range of indicators in aspects of transport	Add modal shift achieved, and proportion of investment on non car modes, to existing indicators
Habitats, landscape and biodiversity	Land cover change; extent of key habitats; and UK species of concern in Ayrshire	Retain and add extent of area protected by policies ENV 3 and 4; and extent of development in protected areas

67. The Group strongly commends the Monitor 2000 – 2004 series. It provides an excellent foundation on which to build both Quality of Life indicators for Ayrshire and the 3 Councils (as required by Scottish Executive guidance); and, with further work, the basis for monitoring and strengthening the implementation of the policies of

the Ayrshire Joint Structure Plan 2025. These developments should take into account the UK sustainable development indicators published in 2005 and those expected from the Scottish Executive by mid 2006. The Monitor series also provides a – if not the – key resource from which the 3 Councils should develop the environmental baselines required for Local Plan (and other) SEAs.

Evaluation of the Appraisal Process

68. The Sustainability Appraisal Group was established by the Joint Structure Plan team with the objective of providing an assessment of the evolving plan. It comprised people drawn from a wide range of agencies and interests in Ayrshire, including business and enterprise; environmental agencies; community interests; and from community planning by the three Councils. The Group worked alongside the Structure Plan team, and was supported by an independent facilitator and adviser, who chaired the meetings and prepared briefing papers and reports. Planning officers from the three Councils while present as observers were able to contribute to the debate. Over a two-year period, the Group held 8 meetings approximately quarterly, with typically 12-15 people present.

69. The Group's meetings usually comprised a presentation and discussion on the stage reached in the Structure Plan, and undertook workshop sessions and received briefing papers on the work of the Group. The output of the Group has been published on the Joint Structure Plan website.

70. Because the Group has worked closely alongside the Structure Plan team, it is not possible to disentangle with any precision what has been the impact of the Group. In particular, as already described, there were significant positive changes from the Consultation Draft to the Finalised Draft. These changes have been in line with what the Group recommended, as set out in its Interim Report. However the Group recognise that any credit has to be shared with all those involved in the process – the Joint Committee, the structure plan team, the three Councils, and the many agencies and individuals who have made inputs to the plan.

71. It was not all plain sailing. The appraisal required more meetings over a longer time-frame than originally envisaged. At the same time, the relative infrequency of meetings meant it was not easy to always engage members fully in the process outwith the meetings themselves. The work was tied to the evolution of the structure plan, and it was difficult to pace the work, at times awaiting developments, at others having to respond quickly. Sometimes Group members provided input, such as suggested text amendments, at a stage when text had already been agreed with Councils or approved by the Joint Committee.

72. Besides these operational matters, there were problems at a deeper level. Because the discussion was about strategic policy, only a few of the topics – such as household projections – were readily amenable to quantifiable analysis. The subject matter has often been qualitative and many aspects have raised questions of judgement. Trying to apply an approach based on the appraisal of choices is also difficult when topics do not arise as choices to be appraised (or the judgement is that choices should be left to be determined at local plan level). The reality is that the plan team, as is often the case with strategic planning, is pressed to negotiate one 'alternative' way forward which meets requirements and has the prospect of approval. In this situation, the generation of hypothetical alternative options would be

artificial and the right course is to form a judgement on the merits of the option proposed and, if appropriate, how best it might be delivered.

Relationship to Strategic Environmental Assessment

73. This sustainability appraisal has not been a Strategic Environmental Assessment, and this was appreciated soon after work commenced. From the outset it set out to consider economic and social aspects as well environmental in assisting the plan to adopt good practice and ensure policies developed in a robust manner. As noted above, it has also engaged with policies at a level where many of the impacts, including environmental impacts, cannot be determined with precision: as a result the process has been characterised more by debate and the exercise of judgement and experience, rather than detailed analysis. However, there are several aspects in common with the SEA process, and there is much common ground with the approach, and conclusions, of the informal SEA of the previous Structure Plan carried out in 1999.

74. The sustainability appraisal has had regard to the Scottish Executive's interim planning advice on the Environmental Assessment of Development Plans. Almost all of the 14 stage assessment process recommended in the advice has been followed: criteria for use in assessment have been adopted; the plan's aim and vision assessed; where alternatives arose, the implications of them have been assessed (including transboundary effects); the policy range has been checked, and policies and proposals assessed; an interim report published; plan modifications taken into account; and the final report is being submitted with the finalised plan. Even where there have been departures - for example, there has been no separate baseline information collection - a surrogate was identified in the Monitor 2004 report. The appraisal makes suggestions in relation to monitoring and review, including how this could be developed for a number of purposes, including as an input to the SEAs which will be required for a wide range of statutory plans and strategies, including the subsequent Local Plans.

Conclusions on the Process

75. Overall, the process has had several positive aspects:
- People have been willing to give their time, contribute to the appraisal and see the process through; most members stayed the course;
 - This has provided an additional channel for participation and informed debate with wide range of interested parties, without prejudice to any member making any of the usual representations, consultations and negotiations;
 - The critical appraisal has acted as both a check and a sounding board for the Structure Plan team; it has been a constructive engagement; and
 - As a result, the Group has been able to make a significant input to the approach and content of the evolving plan and its policies.

76. In conclusion, the Group believes it has provided added value. It has contributed to a better and more sustainable plan, and one where more people feel a sense of understanding and ownership of it. It is also hoped that the appraisal will help draw attention to the importance of the Structure Plan for the three Ayrshire community planning partnerships, and for the three Ayrshire councils' contribution to sustainable development required as part of their duty of Best Value.

Acknowledgements

77. This appraisal process has benefited from three key assets. First, it was initiated by Ian Johnson and the Joint Structure Plan Team. Ian Johnson, John Esslemont and Toby Wilson have complemented each other, and have been supportive throughout. They have kept the Group informed of progress, offered guidance, yet given the Group its independence and engaged very positively, even at stages when the Group has been critical of the emerging plan.

78. Second, the three Ayrshire Councils have sent members of their planning teams to act as observers and these too have materially contributed to the Group's progress. If Karl Doroshenko and Antony McGuinness are cited by name, it is because they have seen the process through all its stages.

79. Third, thanks have to be expressed to the Group members themselves. People have stayed the course, and been constructive throughout as well as a pleasure to work with. We have all gained by the process, and learned more about structure planning and about Ayrshire. We all hope that in return we have contributed to a better structure plan, and perhaps through this to a more sustainable Ayrshire.

Tim Birley for Ayrshire Joint Structure Plan 2025, Sustainability Appraisal Group
20 February 2006

**THE THREE Ayrshire COUNCILS AND
THE JOINT STRUCTURE PLAN TEAM**

**AYRSHIRE JOINT STRUCTURE PLAN 2025
SUSTAINABILITY APPRAISAL GROUP**

FINAL REPORT, FEBRUARY 2004

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Ayrshire Joint Structure Plan Team

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North Ayrshire Council, Planning

South Ayrshire Council, Planning

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SUSTAINABILITY APPRAISAL GROUP

FINAL REPORT, FEBRUARY 2004

MEETINGS OF THE SUSTAINABILITY APPRAISAL GROUP

Wednesday 17 December 2003
Monday 12 January 2004
Friday 19 March 2004
Friday 21 May 2004
Wednesday 13 October 2004
Monday 18 April 2005
Monday 13 June 2005
Tuesday 13 December 2005

REFERENCES

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- Ayrshire Joint Structure Plan & Transportation Committee 2004 **Ayrshire Joint Structure Plan: Monitor 2004** *A set of indicators to monitor structure plan policy* May
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- Ayrshire Joint Structure Plan 2025 Sustainability Appraisal Group 2004 **Interim Report** *(submitted to 3 December 2004 Meeting of the Ayrshire Joint Structure Plan and Transportation Committee)* November
- Tyldesley, David and Associates 2003 **Environmental Assessment of Development Plans: Interim Planning Advice** Scottish Executive Development Department, August
- Scottish Executive 2004 **The Local Government in Scotland Act 2003: Best Value Guidance** Version 1/2004 January

In addition, other working papers and minutes of the Sustainability Appraisal Group have been published on the Joint Structure Plan website (http://www.ayrshire-jsu.gov.uk/sustainability_appraisal.html)