

AYRSHIRE JOINT STRUCTURE PLAN 2025
SUSTAINABILITY APPRAISAL GROUP
Wednesday 13th October 2004
Links Road, Prestwick

Present:

Ian Anderson (IA)	Scottish Natural Heritage
Tim Birley (TB)	Facilitator
Zoë Clelland (ZC)	RSPB
Robin Cole (RC)	Scottish Enterprise
June Dawson (JD)	SEPA
Karl Doroszenko (KD)	East Ayrshire Council
Ian Johnson (IJ)	Ayrshire Joint Structure Plan and Transportation Team
Bob Leach (BL)	Ayrshire Chamber of Commerce
Iain Mathieson (IM)	SEERAD
Adrian Shaw (AS)	South Ayrshire Council
Toby Wilson (TW)	Ayrshire Joint Structure Plan and Transportation Team

Apologies

Alan McGonigle	South West Scotland Energy Agency
Helen Sinclair	East Ayrshire Council
Carol Gilbert	SPT
Fiona Campbell	South Ayrshire Council
Sandra Bale	North Ayrshire Council

1. Introduction

It has been some time since the group met. This has been for a number of reasons including a pushing back of the timetable for when the Structure Plan will need to go to the Scottish Executive and there not being an Environmental Policy Officer in post in the Ayrshire Joint Structure Plan Team. Ian Johnson introduced Toby Wilson, the Team's new Environmental Policy Officer; and members of the group also welcomed Bob Leach from the Chamber of Commerce.

IJ reported that while the Team had received legal advice confirming that the plan would not need to formally require to comply with SEA requirements, there was still a wish to undertake work in the spirit of SEA. KD noted this would be helpful, as subsequent local plans will be subject to SEA, with the implication that the strategic environmental context will itself have been assessed.

2. Response to the draft Ayrshire Joint Structure Plan consultation

(See also paper on overview of comments for Sustainability Appraisal: *comments.doc*)

The Plan was produced and agreed for circulation in June 04 with consultation responses to be back by the end of August 04 (though some responses were still coming through in October). A note that the Plan was available to comment on went to 450 organisations and a copy was available on the Internet.

Over a hundred responses were received, 23% of those targeted in the information note. This was a better response result than for the last Structure Plan, when hard copies were mailed out.

It was disappointing and concerning that there were very few responses from communities or Community Councils, and there is an uncertainty within the Ayrshire Joint Structure Plan Team as to what to do about this. Rural dwellers are likely to be affected by a number of policies in the Plan, but often strategic plans like this do not contain enough detail for people to see how they can engage with them. IM stressed the importance of rural policy, and that radical change in agricultural support will change the rural economy and alter the future of the countryside. AS suggested there might be scope for further consultation mechanisms, such as the community futures programme in the Loch Lomond & Trossachs National Park. In terms of engaging with rural communities, RC pointed out the reason for

electing Councillors is to represent the people's views and so this has been an avenue for engagement. TB suggested there might be scope for further consultation sessions with Councillors, but KD and IJ said this was underway: a panel of the Chairs of the 3 local authorities has been set up for the Joint Structure Plan Committee to check proposals against.

The timetable for the finalised draft Structure Plan going to the Ayrshire Joint Structure Plan Committee has been pushed back so that it will now go to the March 05 Committee meeting rather than the December 04 meeting (this was approved at the September 04 Committee).

The Sustainability Appraisal Group can influence the Plan up until the December 04 meeting of the Joint Co mmittee. TB envisaged the group producing two further reports; one in the period before the December 04 Committee meeting seeking to influence the Plan; and a second one to be published at the same time as the finalised Plan, to act as an independent commentary on it.

3. Issues raised by the group following the response overview

There continues to be a debate about the content of Structure Plans. IJ advised that the Scottish Executive's advice seemed to be that the plans should move towards having strategic spatial priorities and a vision for the region rather than very specific policies. IA did not feel that this new format was useful to planners or agencies. In discussion it was agreed that there was scope for reflecting on whether the consultation draft was the right way to present policies.

ZC raised, and it was felt generally, that the environment needed to be more integrated throughout the Plan and that it currently seemed to be very detached and consequently gave the impression of being less important than the other aspects of sustainable development. There was a sense of a paradox: that many of the elements sought are in the current draft, but taken overall the draft does not read as giving sufficient weight to the environment.

There was concern that waste has not been dealt with in the Structure Plan and the idea of a strategic waste plan was supported. IJ acknowledged the omission of the issue; the team had not been in a position to put forward policies in the June draft, and it will be addressed. In discussing waste, the Group thought policy ought to both go beyond local authority boundaries, and deal with waste locally at source. There was some debate about whether there should be a sizeable waste management centre, possibly a recycling centre, located in Ayrshire but serving most of the west of Scotland. This could be a valuable economic development opportunity; however, it is always difficult to get support for this in the local councils, due to the public's reaction to developments of this kind. It was felt that the Structure Plan should nevertheless present waste as a resource rather than a problem.

Action

IJ and TW to continue to develop the waste section of the Plan.

4. Reactions to the plan from a sustainable development perspective.

(see also briefing paper by Tim Birley, *41007Oct.doc*)

The Group largely agreed on the views expressed in the briefing paper. Retaining population levels was felt to be sustainable, however if this was done through the provision of housing, the type of housing needed to be appropriate to the population and the quality of the housing had to be of the highest environmental standards.

IJ stressed the importance of design awareness, which the Scottish Executive want to see built in, and that master plans would be a key tool. KD supported the master plan approach; local authorities have not got the resources to undertake it. If the Structure Plan identifies broad locations for development, then the Plan could place an expectation on developers to prepare masterplans that take account of sustainable development criteria. These might include retention of natural features and structural landscaping; Sustainable Urban Drainage Systems, and consideration of achieving energy efficiency through the orientation, massing and location of buildings (though it was noted planning cannot tie development to specific Building Regulation standards).

The Group concluded that the way in which development is carried out is as crucial as matters such as location to whether it moves towards or away from more sustainable development. For this reason, the Structure Plan has an important role in specifying what is to be included in Local Plans, to provide a supportive framework for sustainable development to be followed though at that level.

Action

IJ and TW to explore this.

A number of large scale projects were discussed, including a University of Ayrshire and a energy park, which were thought to have the potential to make for a more sustainable Ayrshire. There is a role for practical examples as demonstrations of 'best practice' alongside the wider mainstreaming of 'good practice'. However, it was agreed that the Plan had to be realistic: it would be no good making provision for developments which are not going to happen. However, it was felt that the Structure Plan should give a greater steer on certain large-scale developments. Ayrshire is well provided in energy resources, and a show-piece initiative demonstrating the next generation of energy supply through to energy efficiency in buildings could also be a tourist resource. The Plan could give a clear indication (parallel to what is already said on "a major coast-based recreational development") of the kinds of initiative that the Plan would welcome, and the criteria they should meet.

The Group discussed the extent to which judgements on sustainability could be underpinned by more objective measurement. Judging whether or not a plan is becoming more or less sustainable is always partly subjective. However, the Monitoring reports produced by the Ayrshire Joint Structure Plan Team do provide a useful basis from which the movement towards or away from sustainability can be measured. TB indicated that the next report would aim to link back to the Group's earlier work on criteria and indicators. An offer from AS of resources to explore the potential role of ecological footprinting was welcomed as one way which might get some measure of the implications of alternatives.

The Group also discussed how criteria such as the choice between brownfield or greenfield sites should be applied. While maintaining a preference for brownfield development, and ensuring that environmental harm is minimised and benefit maximised, it was recognised that this is not a simple matter, and the Group did not adopt a "brownfield good", "greenfield bad", position. They recognised that brownfield site development costs can be prohibitive, and existing services may not be viable for re-use. At the same time, either greenfield or brownfield sites may be remote, environmentally sensitive, or have infrastructure constraints. This can mean two things. First, that if development is constrained to sites which are not viable, development which may be sought may simply not take place; second, if costs are disproportionate, then this may signal that in terms of resources and ecology, brownfield development is not the more sustainable option. The Group recognised that there may be situations when the more appropriate use of brownfield sites may be low cost alternatives; or public sector intervention may be required. Given advice from IJ that the scope for brownfield development may be less in Ayrshire than in the Central Belt more generally, this is a topic where guidance and criteria will need to be framed carefully.

Action

TB will e-mail the Group by 15th October, to ask for comments on the draft paper, in order to turn it into the Group's response to the Consultation Draft. Group members please comment by the 29th October.

Using the comments, TB will write a paper putting forward issues to be taken into account in the draft Ayrshire Joint Structure Plan before it goes to Committee on the 3rd December.

Toby Wilson

Environmental Policy Officer, Ayrshire Joint Structure Plan Team
14th October 2004

Tim Birley

Facilitator, Ayrshire Joint Structure Plan: Sustainability Appraisal Group
16th October 2004