

Ayrshire Joint Structure Plan and Transportation
Committee
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Dear Mr Johnson

AYRSHIRE STRUCTURE PLAN 2025 – CONSULTATION DRAFT

Thank you for consulting SPT on the above document. In general the aims and objectives of the draft are to be welcomed, in particular the setting of a sustainable development agenda for the Ayrshire area. The questions posed in the draft have been answered in Appendix 1, however it should be noted that more detailed comments are to follow regarding some of the issues.

I trust these comments are of assistance and look forward to the production of the Finalised draft in the future.

Yours sincerely

A handwritten signature in black ink that reads "Hilary J. Howatt". The signature is written in a cursive style with a large, stylized initial 'H'.

APPENDIX 1 - Questions

Question 1 Does the Vision Statement set the correct agenda for the future?

Answer 1 The Vision Statement raises no issues for SPT and sets a sustainable development agenda for Ayrshire, which is to be welcomed.

Question 2 Future population projections based on recent performance suggest that Ayrshire will face a considerable loss of population. Is this trend acceptable, should there be an attempt to stabilize the population at current levels, and is this realistic?

Answer 2 As was noted in the Sustainability appraisal stabilising the population could assist in maintaining public demand for public transport which would assist in particular the support of rural services. However, there could be a potential increase in the number and length of trips if more commuting results from the proposed levels of new housing development. The potential impacts of the proposed housing releases and resources to deal with this require to be more fully assessed. Proposed housing releases should be located in areas with good public transport accessibility .

Question 3 Are the seven principle aims of the strategy appropriate?

Answer 3 We note that economic growth features in three out of seven principles, while social inclusion is not specifically mentioned at all. It may be more appropriate to substitute 'growth' / 'economic development' / 'economic growth' with sustainable economic development, to align with the vision statement.

Furthermore the principle of 'improved accessibility' within Ayrshire could be more targeted at accessibility within and towards the core investment area towns within Ayrshire.

Question 4 In what way and to what extent should the Gateway Locations be developed to attract investment? Are there other locations that might be considered as gateway opportunities?

Answer 4 The integration of the Gateways with public transport should assist in attracting investment to these locations. Consideration should therefore be given to the capacity of the existing public transport network to manage any additional levels of development proposed and the scope for and ability to deliver any required improvements to public transport arising from this.

Question 5 Do you agree that the area surrounding Ayr, Irvine and Kilmarnock should be the main focus of future development?

Answer 5 It is considered appropriate to focus future development on town centres which act as hubs for public transport. The draft recognises the need to avoid coalescence and protect town centres as key nodes. It is noted that proposals for the Core Investment Areas are to be achieved by (inter alia) improved public transport. SPT seeks to improve public transport in line with its General Policy Statements and would be supportive of an integrated approach to the Core Investment Areas which links to existing and planned investments in public transport.

Question 6 Six Investment Corridors have been identified. Is the concept valid, do they cover the correct areas or are there other areas that should be included?

Answer 6 The plan proposes a series of Investment Corridors. It is noted that these are based on either rail lines or bus corridors and, therefore, have the advantage of public transport options which is to be welcomed. However, potential issues are raised in terms of

the level of improvements required relating to public transport in order to deliver the proposed developments and meet the drafts aim of improved accessibility.

Question 7 How can the potential of Ayr, Irvine and Kilmarnock be realised?

Answer 7 One element which would assist in realising the potential of Ayr, Irvine and Kilmarnock would be to ensure an appropriate public transport service, in particular in terms of its capacity, integration with land use and other modes and the potential to deliver this.

Question 8 A hierarchy of communities has been established in Schedule 1 based on their function: do you agree with the classification?

Answer 8 The Core town centres act as public transport hubs and as such their inclusion in Schedule 1 raises no significant issues for SPT. In general the Service Centres are better connected than the lower elements in the hierarchy. All the other centres are connected to public transport in some way, although the level of service and mode of connection varies.

Question 9 In what ways can rural areas support the overall aim of developing the economy?

Answer 9 Rural areas that are integrated with the public transport network are best placed to support the overall aim of developing the economy in a sustainable and socially inclusive manner.

Question 10 Should more housing be built in the countryside?

Answer 10 SPT seeks to ensure that adequate and affordable access by public transport to employment and other facilities is available to meet the needs of all groups and communities and that services recognise the particular requirements of those living in rural areas. SPT sub objectives which seek to address these issues include ; continuing to provide innovative ticketing in rural areas and identifying rural travel priorities and seek innovative solutions to meet rural travel needs in a cost effective manner, including shared taxis.

As noted in the Sustainability Appraisal additional housing in the countryside has the potential benefit of increasing patronage on services and thereby increasing the viability of these services. This would most likely occur where development is directed towards existing settlements with public transport links or on the routes of existing services.

As was also noted in the appraisal developing a more dispersed pattern of housing, however, has the potential to exacerbate issues related to the delivery of public transport in rural areas. The potential for the development of lowland crofting is recognised. However, for this to be truly sustainable householders should not be unduly reliant on their vehicles. Locations near to towns and villages with existing public transport infrastructure would be a preferred option.

Question 11 In addition to the transport proposals identified what other development of the transport system would be appropriate?

Answer 11 The following notes the transport proposals within the draft that may have implications for SPT and require to be assessed further prior to our final comments:-

Improving Accessibility – the draft identifies areas for rail line improvement to the north of Ayr and to the south of Ayr; Largs to Kilwinning – related to Hunterston; Kilmarnock - Barrhead ; Shields Road Junction to Paisley Gilmour Street, and to Glasgow International Airport.

Rail Studies - the draft identifies areas from Ayr – Dumfries, Ayr- Kilmarnock (freight) , Glasgow - Ayr Capacity (PT Scheme) and Glasgow - Ayrshire Rail Services = (Potential Scheme) and Kilmarnock to the south (freight).

The draft states that rail lines in Ayrshire are at capacity and give the following areas to develop passenger rail capacity:-

Extension of Glasgow – Ayr electrified line to Ayr Hospital /SE Ayr

Completion of dynamic loop on Glasgow/Kilmarnock line to enable introduction of half-hour service and to consider the option to restore double track in the future

Improvements to Glasgow Prestwick International Station

Lengthening of platform at selected stations

Provision of passenger halts to link with housing land released

The draft seeks to develop rail freight capacity in the following locations:-

Improved junction at Mauchline

Improvements to Hunterston link

Passing loop on Glasgow-Ayr line

Additional road/rail freight facilities

The draft offers support to SPTA in the development and improvement of the Paisley to Glasgow rail line and cross Glasgow City rail transport routes which is welcomed.

The draft seeks co-ordinated action with D & G Council to target potential improvements to the Kilmarnock – Dumfries and Carlisle rail line and the development of a much upgraded rail link between Carlisle and Dumfries to Stranraer via Kilmarnock and Ayr.

The draft states that ‘Capacity and quality improvements to surface access links between the ports and the main transportation networks will be necessary’

The draft states that ‘Hunterston requires rail improvements’.

Comments on the above will be forwarded in the near future.

Question 12 In addition to the regeneration proposals identified, are there other opportunities for community regeneration and what are the most appropriate mechanisms for their achievement?

Answer 12 The draft notes 2 major regeneration initiatives. The draft Joint Transport Strategy is supportive of such initiatives. In the development of regeneration initiatives consideration should be given to the availability of existing public transport infrastructure and services and the potential to improve these.

Question 13 How much future housing should be planned for in the future and where should that housing be located to ensure success?

Answer 13 The draft seeks to make provision for an additional 20,000 houses in the period to 2017 and 34,000 to 2025. This raises 2 issues:-

i) It is considered that housing development alone cannot be relied upon to provide economic growth and has the potential to increase long distance commuting to the Glasgow conurbation. This is not considered to be supportive of sustainable development and could place increased pressures on the public transport system. It will be important therefore, to promote a level of employment opportunities within Ayrshire which complement the suggested approach.

ii) The location of the new houses has the potential affect the levels of accessibility within Ayrshire. If the population becomes more dispersed, this could result in more need to travel and in areas which are more difficult to serve by public transport.

The finalised plan, therefore, should avoid the development of a more dispersed population pattern which would be more difficult to serve by public transport. Where the housing is to be developed will be important in terms of how effectively the public transport network can serve the area in the future. The use of existing public transport infrastructure and services should be a key consideration in the location of new development, followed by areas of planned improvements to this.

Schedule 2 gives the criteria for new housing release, one of which raises potential issues for SPT:-

'Is directed to locations where there are opportunities for improved public transport links'

It is suggested that it may be more appropriate to take a sequential approach as regards access to public transport in the interests of effective use of available resources and to promote sustainable development. For example, an approach which seeks to locate new development near to existing public transport infrastructure as the preferred option, followed by locations which are included in current plans for public transport infrastructure investment, followed by those which have the potential to be improved in terms of public transport provision.

Question 14 How should strategic policy address variable needs and delivery mechanisms for affordable housing?

Answer 14 It is of particular importance to link affordable housing to the existing public transport network or locations where there are planned improvements to this network in the interests of social inclusion.

Question 15 Is this a correct assessment of future industrial requirement? Are there other strategic industrial locations that might be considered?

Answer 15 The provision of accessible business locations which are well located in relation to major public transportation routes is welcomed by SPT

Question 16 It is the intention to continue to recognise town centres as the main focus for retail development: is this policy correct for Ayrshire?

Answer 16 This is to be welcomed as town centres act as transport hubs and in general are more accessible by public transport.

Question 17 How can timber resources and the timber industry be promoted?

Answer 17 We agree that there are advantages of shifting timber freight transport onto the rail network and will be happy to work with partners to overcome any potential rail passenger/freight conflicts.

Question 18 How can Strategic Policy facilitate renewable energy systems to ensure that they act as an economic and sustainable driver for rural communities?

Answer 18 SPT seeks to encourage public transport improvements where they would support the rural economy. In order to maximise the benefits of any such developments and to promote social inclusion, the existing public transport network and potential for improvement to this should be taken in to account.

Question 19 Two potential areas for commercial wind farm development have been identified, are these areas suitable? Should further areas be identified? What constraining factors do you envisage to future wind farm development?

Answer 19 We understand these are in the Carrick area near Dalmellington and south of Eaglesham. In order to maximise the benefits of any such developments and to promote social inclusion, the existing public transport network and potential for improvement to this should be taken into account as part of your considerations.

Question 20 An area has been identified for the large scale coppicing of wood for fuel and forest brash utilisation linked to a possible biomass or co-fired power station. Is this concept valid and how can community benefit be gained? Are there other areas that can be identified?

Answer 20 We understand this is in the Cumnock area. In order to maximise the benefits of any such developments and to promote social inclusion, the existing public transport network and potential for improvement to this should be taken into account as part of your considerations.

Question 21 Should tourism be developed to promote the natural and cultural resources in Ayrshire? Are there other opportunities besides those identified in the plan?

Answer 21 SPT support the sustainable development of tourism as part of our support of sustainable economic development in the west of Scotland. It is SPT's policy to seek to ensure a high standard of public transport provision that gives good access to major tourist attractions.

Question 22 How should Integrated Coastal Zone Management be taken forward? What development opportunities can be identified on the coast?

Answer 22 In order to maximise the benefits of any such developments and to promote social inclusion, the existing public transport network and potential for improvement to this should be taken into account as part of your considerations.

Question 23 Apart from a recognition of the importance of the urban edge of the major towns it is not proposed to introduce landscape designations into the plan other than required by European and national legislation. Is this proposed policy stance correct?

Answer 23 This raises no issues for SPT

Question 23/24 What should be the extent and type of landscape designation necessary to protect the urban edge from inappropriate development?

Answer 23/24 This raises no issues for SPT

Question 24 What issues or opportunities does new legislation on environmental appraisal, design awareness, biodiversity, water quality and flooding bring to the development of strategic policy? Does the plan cover the options adequately?

Answer 24 In our view the thrust of new Environment Appraisal, etc, is to strengthen consideration of environmental issues and effects within the core of any strategy. It is hoped that this will support the search for win-win-win solutions, that is developments that will lead to improved environmental, social and economic outcomes, as opposed to lowest common

denominator solutions, or even solutions that see tokenistic environmental measures being adopted.

In transport terms, SPT is of the view that this approach is best served by giving public transport first consideration in any strategic accessibility context. We therefore welcome the recognition of the importance of public transport within the Plan, and hope our comments will help to improve sustainability considerations of the Plan further.

Question 24/25 How can mineral resources be managed in a sustainable way?

Answer 24/25 In order to maximise the benefits of any such developments and to promote social inclusion, the existing public transport network and potential for improvement to this should be taken into account as part of your considerations.

Question 26 Is there any other issues not covered by the questions that you think it is important to raise?

Answer 26 - Additional Comments as follows:-

Moving Forward Section

It is noted that one of the 6 key issues identified, which represent the foundation on which replacement Structure Plan is based, relates to *'Transport and Public Services infrastructure Support : How to improve accessibility and develop the capacity of current water and sewerage systems.'* Recognition of the role of transport and the aim of improving accessibility is to be welcomed. SPT works to ensure the provision of public transport that is accessible.

Out-of-centre locations

In terms of proposals in out-of-centre locations it is suggested that they should also demonstrate links to the existing or proposed public transport network.

Integration of land use and transportation

In general the recognition that integration of land use and transportation is fundamental to the plan is to be welcomed. However, there are concerns regarding the delivery of the level of improvements to the public transport network that would be necessary in order to support the proposals in the plan.

Joint Transport Strategy

The Finalised Plan should note and be consistent with the SPT/Westrans Joint Transport Strategy. It may also be useful to note the Road Traffic Reduction Act.