

Environment Department
Director: Andrew J Cahill, BSc (Hons)

Planning and Development Services
Head of Service: Steve Rogers, MRTPI MIED

Council Headquarters, Eastwood Park, Rouken Glen Road,
GIFFNOCK, East Renfrewshire G46 6UG
Phone: 0141 577 3000 Fax: 0141 577 3885 DX: 501601 GIFFNOCK

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When calling please ask for: Mr B McAuley 0141 577 3054

Ian Johnson
Manager
Ayrshire Joint Structure Plan & Transportation Committee
15 Links Road
Prestwick
KA9 1QG

Dear Ian

Growing Ayrshire **Ayrshire Joint Structure Plan 2005**

Thank you for your consultation on the above document. I am pleased to note that the Consultative Draft and the accompanying background and technical documents are readily available on your website. However, it is disappointing that the core consultation document and the key technical note on housing land requirements were not produced in a hard copy format. This may have excluded those who do not have access to a computer and the internet and discouraged reading by those not prepared to invest in the cost of printing and photocopying from downloads. That said, on behalf of East Renfrewshire Council, I would comment as follows on the content of the consultative document which raises a number of issues of concern to me.

Whilst I would generally support the Vision Statement and the Strategic Aims of the document I cannot give all these matters wholehearted endorsement. The Spatial Development Strategy seeks "to maintain the population at or about current levels" and puts forward a strategy for housing and economic growth to achieve this central aim. I have no concerns about the strategies for regeneration, improved accessibility and economic growth. However, the aspirations for major residential expansion are likely to create tensions with the Strategy's aim to safeguard and enhance the quality of Ayrshire's environment. These aspirations could also lead to conflict with Government policy and the priorities of the Glasgow and the Clyde Valley Joint Structure Plan 2000 as now reflected in the National Planning Framework for Scotland.

Whilst I would support the aim of stemming continuing population decline and achieving the re-growth necessary to secure a stable population, this will not be achieved immediately as suggested in the document. In reality, decline is likely to continue in the short term with growth and stabilisation hopefully occurring in the medium to long term period of the plan. Consequently, it may be prudent to defer the additional housing land releases to the latter parts of the plan period with additional medium to long term releases only being triggered if monitoring reveals that economic growth and population changes have in fact occurred. In this respect, the consultation document makes no reference to the programming of housing outputs or to the need for appropriate monitoring and control mechanisms to prevent unnecessary housing land releases taking place.

Previous residential expansion in Ayrshire has not stemmed the population decline that has taken place and residential development will not by itself stimulate economic prosperity. Major new house building should not be seen as the principal driver for demographic change or economic growth and, in the absence of commensurate economic growth, increased car based commuting to the Glasgow conurbation is likely to arise. This is contrary to government policy to reduce car usage.

With regard to the overall scale of new housing, the allocations contained in the document appear to be somewhat excessive. The consultation document indicates that 25,854 additional houses are required to accommodate the household growth associated with a stable population target. This can be partly met from land for 13,250 identified in the established land supply and urban capacity studies leaving a residual shortfall of 12,604 houses. However, it is proposed to release additional land with capacity for up to 31,200 houses to cover this residual shortfall. In effect, this results in a total effective housing land supply for 44,450 houses which is almost double the 25,854 houses required to accommodate anticipated future needs. Putting this into perspective, the level of new housing being provided is larger than the total number of households presently resident with the whole of East Renfrewshire. Whilst I would accept the need to build some flexibility into the future allocations the level flexibility built into your figures is highly excessive and I would urge you to reconsider this matter. Additionally, I note that 50% of the supply from the established land supply and urban capacity studies have been discounted from your overall supply figures but the reasons for this are unclear. My colleague, Brian McAuley, would be happy to discuss my concerns about these figures with you in greater detail.

I trust that you will take these comments into consideration and look forward to receiving copies of the finalised Joint Structure Plan when it becomes available.

Yours sincerely

DIRECTOR OF ENVIRONMENT

CC Cllr. A. Lafferty
Cllr. G. Napier