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Ayrshire Joint Structure Plan & Transportation Committee
15 Links Road
PRESTWICK
KA9 1QG

Dear Sir/Madam

AYRSHIRE JOINT STRUCTURE PLAN 2025 – CONSULTATION DRAFT

Introduction

Please find the following consultation response in relation to the Ayrshire Joint Structure Plan 2025 – Consultation Draft. GL Hearn has prepared this response, on behalf of CG Property, part of the Co-operative Group. CG Property is active throughout Scotland and is recognised as providing an essential convenience shopping service to many smaller villages and towns, as well as maintaining and operating its farm business, and providing other essential services to the community.

CG Property has a significant number of operating units within the Structure Plan and operates Monktonhill Farm, a key Green belt location separating the communities of Ayr and Prestwick, and bounding Glasgow Prestwick International Airport. Given the variety and nature of our client's interests in the area therefore, it is clear that CG Property has a significant strategic role to play in the future development of Ayrshire.

Responses

Undernoted are the responses to the Ayrshire Joint Structure Plan Consultation Draft, on behalf of CG Property.

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

The Vision Statement sets out to achieve vibrant communities with a sustainable economy and a good quality of life. At the heart of the vision is the principle of '*setting economic growth within the principle of sustainable development.*' The Vision Statement appears to set the correct agenda for the future, however, it is too general and lacks any indication of a clear strategy. This makes the statement appear to be slightly disjointed.

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 stabilise the population at current levels?*

An attempt should be made, through the provisions of the Structure Plan, to reverse the decline in population. If population decline is not addressed, then the viability of

the region's economy will suffer and there will be little opportunity for further economic development. An active, skilled workforce is essential if new industry is to be attracted to the area, and a balanced population is essential to support retail and service provision (which provide so many jobs in the present economy). Encouraging population growth requires a more integrated response than simply providing additional residential development opportunities. Improving the attractiveness of Ayrshire as a place to live and work is essential. This could be undertaken by improving accessibility, promoting economic growth and prosperity throughout Ayrshire and including the development of new, varied and well located residential environments to attract potential residents to the area. We agree with the proposal identified in paragraph 2.12, which states that the plan will set aspirational targets to arrest decline and then to grow the population.

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

The seven principle aims of the Spatial Development Strategy are appropriate.

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?*

The identified Gateway Locations in the Consultative Draft include Glasgow Prestwick International Airport, Hunterston and the ports at Ayr and Troon. The Gateway Locations should be developed to attract inward investment through a much more proactive approach to promoting the growth and development of these locations through the implementation of development frameworks which focus on the future land requirements for the anticipated development of each Gateway Location.

The identified Gateway Location of Glasgow Prestwick International Airport is a key economic driver within the area and a significant asset to the economy of Ayrshire. The strategic importance of the Airport was identified in a report presented to the Ayrshire Joint Structure Plan and Transport Committee in March 2004 in relation to the White Paper on the Future of Air Transport (December 2003). The Committee Report identified that Glasgow Prestwick Airport is recognised as having an important regional role and as an established freighter airport Prestwick is *'ideally placed with respect to environmental capacity to accommodate substantial additional airfreight at a Scottish and potentially national scale.'*

In light of the above, we are of the opinion that the Airport, which has passenger levels currently growing at 40% per year, should be significantly developed to attract investment in the long term. The provisions of the Structure Plan and subsequently the Local Plan are the most appropriate policy frameworks for achieving such improvement through the creation of a development framework which supports such investment and encourages further growth. The Airport should be developed to attract investment through the designation of adjacent land to accommodate the expansion of Airport related activities, including hotel accommodation, residential development for the Airport workforce, increased car parking provision, etc. In our submission to the South Ayrshire Local Plan Inquiry we propose that, in order to determine the appropriate development and the extent of the expansion of the Airport, a Masterplan should be prepared and subsequently supported by policy which promotes the concept of development at Glasgow Prestwick International Airport.

We have no comment to make on other locations that should be considered as Gateway Locations.

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

CG Property is of the opinion that focusing future development to the identified Core Investment Area of the towns of Ayr, Irvine and Kilmarnock offers only part of the right development solution. There needs to be a balance attained between developing these settlements appropriately but not to the detriment of smaller settlements in Ayrshire.

This issue of the concentration of development in the Core Investment Area raises concerns about the protection of small local shopping provision which is of particular concern to CG Property who currently play a key role in the provision of local shopping facilities in many marginal areas throughout Ayrshire. PAN 52 'Planning in Small Towns' reiterates these concerns as it states *'the larger centres ... have increased their market share in relation to small towns which has resulted in a reduction in the number and variety of shops, decline in the number of locally owned shops and an increase in the number of non-retail uses.'* In light of the above, the over-concentration of development, in particular retail development, in the areas of Ayr, Irvine and Kilmarnock, could potentially disadvantage smaller towns within Ayrshire. It is essential to ensure that all members of society have equal access to high quality services, employment opportunities and shopping provision within a sustainable framework. While most people may be able to travel to larger settlements, many less advantaged, who do not have the same access to private transport, and who therefore depend on infrequent and expensive public transport.

The emerging Ayrshire Joint Structure Plan should therefore create a balance between promoting and directing sustainable future development to the Core Investment Areas while simultaneously ensuring the provision of a wide range of everyday needs locally by promoting and safeguarding local shopping facilities in smaller Ayrshire towns.

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?*

The concept of investment corridors appears valid. It should, if managed correctly, enable development to take advantage of principal population and transportation nodes, and protect other areas from inappropriate development pressure. However, it is essential that clear boundaries are identified and strong policy support for development established.

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

The potential of the towns of Ayr, Irvine and Kilmarnock can be realised through the attraction of new economic investment to these locations. A key contributory factor in the realisation of this potential is the capitalisation of Prestwick Airport, a significant asset to the Ayrshire economy, through the development and expansion of Prestwick Airport and associated Airport related land use development at Prestwick.

As discussed in the foregoing, the potential of these towns can only be realised through simultaneously promoting development in smaller rural towns, in particular, maintaining and promoting the quality and range of local shopping provision in smaller rural towns. The Structure Plan could establish a policy requirement for Local Plans to identify specific development strategies and frameworks for these towns, but this would need to be undertaken in a coherent and integrated manner, ensuring that

towns do not compete for the same investment. Each town should identify its strengths and define its role so that it can develop in an individual way, while still complimenting the growth of other centres and supporting the general improvement of the region.

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

Yes, we agree with the classification identified for the hierarchy of communities as shown in Schedule 1.

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

Rural areas can support the overall aim of developing the economy through the promotion of the diversification of rural business. Rural development within existing settlements should be promoted and, in particular, retail development of an appropriate scale should be supported and existing local retailing provision be protected from the development of very large format supermarkets in Ayrshire. Rural areas have the potential to deliver significantly to the economy, not only through traditional businesses, but also through new sustainable business, and tourism. The effective use of new technology could also offer new employment opportunities to more remote areas. What is important, is that such rural areas are neither ignored in favour of development in towns, nor restricted solely to providing recreation opportunities for urban residents.

Question 10 ***Should more housing be built in the countryside?***

CG Property supports the principle of more housing being built in the countryside in appropriate localities. The re-use of existing buildings within the countryside and the expansion of existing settlements or development adjacent to existing settlements in the countryside are specifically supported. Such support is provided on the basis that any new residential development in the countryside will maintain the existing rural character and amenity of Ayrshire.

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

We do not wish to comment in detail on this matter, but would confirm our support for the continued development of the Airport and the improvement of transport links to the Airport. In terms of other investment, we strongly support the need to ensure that such investment is directed to proposals and locations where it can offer meaningful benefits and can unlock other development opportunities for the wider benefit of the community.

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?***

The identified regeneration proposals identified in the consultation draft appear to be appropriate. However, more support should be offered to the regeneration of smaller communities. In such locations, limited, targeted initiatives can make significant difference to the quality of life of such settlements. When there is likely to be much

emphasis of development in the larger settlements, clear support for smaller communities is also necessary to ensure a balanced development strategy.

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

We do not wish to comment on the actual proposed figures at this time. However, in terms of the location of new development, we consider that it is essential to ensure that a suitable variety of locations are identified, to ensure that there is sufficient access to new housing in all the region's communities, rather than necessarily concentrating such development on a limited number of strategic sites.

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

CG Property has no comment to make on this issue at this time.

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

We cannot comment in detail on the accuracy of predictions about industrial land requirements. However, what we can say is that, with the development of the A77 to motorway, the creation of the Southern Orbital Route around South Glasgow, and the exponential development of Prestwick Airport, Ayrshire has greater potential now as an investment location than at any time in the recent past. It is therefore essential that a positive investment framework is created that can meet demand and attract new investment. Key locations are clearly going to be in demand, like Prestwick Airport, and policies should be in place for such locations to facilitate additional development beyond those sites already identified. In addition, more general policies should be established to address investor demand in locations not identified. If new investment has a specific locational need for a site not identified as an investment location, then policies should be in place to assess such demands and deal with them appropriately.

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?*

It is agreed that, in accordance with the sequential approach, the town centres identified in Schedule 1A and 1B should be the main focus for retail development in Ayrshire and these town centres should be supported and enhanced through Structure Plan policy. This policy is correct for Ayrshire, however, a review requires to be undertaken in relation to the issues of retail capacity and need in the Ayrshire locality.

In addition, as highlighted previously, it is imperative that Structure Plan policy safeguards existing local shopping provision and promotes new provision where a clear qualitative and quantitative deficiency is identified.

Questions 17 to 23

We do not wish to make any comment on the above questions. These matters relate to issues that are not of direct concern to our clients and therefore would not benefit from detailed response.

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

We are of the opinion that the current Greenbelt designation for the Ayrshire locality is not an effective mechanism for protecting the urban edge from inappropriate development. We have registered our concerns in relation to South Ayrshire Council's Greenbelt assessment and proposed subsequent Greenbelt designation within the emerging South Ayrshire Local Plan. Our key concern relating to the proposed Greenbelt within the South Ayrshire Local Plan is that the Greenbelt has been designated in a manner not consistent with the existing Structure Plan and with no reasonable justification for the allocations.

In order to achieve a balance between promoting development and restricting development through appropriate controls, alternative mechanisms to Greenbelt designations should be considered as part of the Structure Plan process.

Circular 24/1985 defines the purpose of the Greenbelt:

- *'to maintain the identity of towns by establishing a clear definition of their physical boundaries and preventing coalescence.*
- *to provide countryside for recreation or institutional purposes of various kinds; and*
- *to maintain the landscape settings of towns.'*

Greenbelts are generally regarded as an element of urban policy implemented to promote urban containment. We are of the opinion that Structure Plan policy which requires urban containment within Ayrshire would be more appropriate than Greenbelt designations. The Structure Plan identifies that a strategic and coherent landscape protection criteria should be developed and we are in support of this proposal, which would replace the Greenbelt policy. However, the identified purpose of the protection criteria raises concerns as with the exception of the last identified purpose *'to develop habitat networks linking the community to the immediate countryside,'* the three other purposes are very similar to the defined purposes of the Greenbelt as identified above.

Questions 25 and 26

Our client has no comment to make on the above questions.

Question 27 *Are there any other issues not covered by the questions that you think it is important to raise?*

We have no comments to make at this time, but wish to reserve our position in case new information or issues come to light.

Summary

The above responses are provided on behalf of CG Property. CG Property has an important and varied role to play in the plan area, through its retail service and farming businesses. In particular, its key land holdings, close to Monkton, Prestwick Airport and Troon offer excellent opportunities to both facilitate the improvement and continued development of the Airport, while also protecting the identity and separation of the settlements of Prestwick and Troon. Our client is also committed to supporting

the community of Monkton through the improvement of facilities, services and the support of its presently falling population.

In light of the above, we request that the Structure Plan team invite our clients to any further discussions that may be undertaken on such matters as are of relevance to our client's interests. Please do not hesitate to contact me if you wish to discuss this matter further.

Yours sincerely

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