

HOMES FOR SCOTLAND

RESPONSE TO AYRSHIRE JOINT STRUCTURE PLAN 2025 CONSULTATIVE DRAFT

Question 1 Vision Statement

Homes for Scotland agrees that the Vision Statement sets a reasonable and realistic agenda. In particular, it recognises the interdependence of economic growth, social well-being and environmental issues but, rightly, places emphasis on economic growth as the driving force to achieve other desired improvements. The Vision is compatible with key areas of Scottish Executive policy, notably the Smart Successful Scotland initiative and emerging thinking on retaining and growing population.

Question 2 Population Trends

Population trends in themselves are not certain indicators of future change, nor are they inherently acceptable or unacceptable. It is the implications of these trends that must be judged as acceptable or otherwise, and if unacceptable policy responses must be devised to effect change. The Draft Plan appears to reflect a view from the three Councils that population decline is unacceptable, and that stabilisation of the existing population level is a realistic objective. Homes for Scotland sees this as compatible with other policy in Ayrshire, including economic policy emerging through the Ayrshire Economic Forum. It is also compatible with Executive policy as discussed in the previous question. The Plan is clear on the economic and social implications of population decline, as well as the potential benefits of the proposed strategy, in terms of making Ayrshire a more attractive place in which to live.

From the housebuilding industry's point of view, the strategy is compatible with the evidence that Ayrshire, or at least those parts of it which enjoy good accessibility, is a growing housing market with good potential to maintain and expand that growth.

Question 3 7 Principle Aims

Homes for Scotland generally supports the seven aims set out in the Plan. It is suggested that, in order to fully reflect the priority of the Plan to promote growth in both economic activity and households, the aims should include a more specific reference to the need to identify adequate levels of housing land and encourage new housing development.

Housing is clearly the major user of new land to be promoted through the development plan, and it must be right that this is explicitly recognised in the aims of the Plan. Further, housebuilding is a significant contributor to the Scottish economy and should be recognised as such in any Plan seeking to promote economic growth.

Question 4 Gateways

The Draft Plan recognises most of the key gateways and the functions – economic, housing, transport – that they can play. Homes for Scotland would suggest that the M77 is a key spatial feature of the strategy for the area, and locations within that corridor may have potential as a further gateway. However, the M77 is also rightly identified as an Investment Corridor.

Question 5 Core Investment Areas

Homes for Scotland would agree that the identified Core Area is realistic, offering as it does the main concentrations of population and employment. A combined population of 160,000 offers the opportunity to plan for facilities in an integrated and co-operative way across the three main towns in order to promote economic growth. Conversely, it is difficult to see how any of the smaller settlements could be added to the Core Area without also accepting the arguments for other settlements to be included. Therefore the Core Area seems appropriate as the primary focus for investment.

Question 6 Investment Corridors

In general, Homes for Scotland recognises the value of identifying Investment Corridors based on factors such as transport links and settlements with development potential. In that respect, there may be a question as to whether all 6 Corridors have similar levels of potential, and therefore similar calls on scarce resources. For instance, while the Glasgow link corridor clearly contains an important transport link, it does not contain significant centres for population and economic growth. The Irvine Valley likewise may not offer the same economic potential as other corridors.

With both a Core Investment Area and 6 Investment Corridors, the concern must be that there will be insufficient resources to stimulate growth in them all, and the Finalised Plan should perhaps refine the analysis of the potential of these areas and seek to address priorities in more detail through an accompanying Action Plan.

Also in relation to the Corridors, do they represent strategic drainage catchments in terms of water and drainage infrastructure?

Question 7 Potential of Ayr, Kilmarnock and Irvine

Again, the question arises of the extent to which resources may have to be prioritised towards investment in these three key towns, and in adjacent settlements and links, in order to realise economic growth potential. In terms of housebuilding, these towns will clearly be the focus of their sub-markets, but it must be recognised that housebuying behaviour extends across wider areas nowadays, and in any event national guidance requires that a range and choice of locations, house types and sizes are planned for, suggesting a spread of housing land within and adjacent to the Core Area. Again, the issues may only become apparent when a Finalised Plan and Action Plan become available.

Question 8 Hierarchy of Settlements

(SCHEDULE 1 SETS OUT A HIERARCHY OF SETTLEMENTS BASED ON THEIR CAPACITY TO ACCOMMODATE DEVELOPMENT. DOES THE COMMITTEE AGREE WITH THIS, AND DOES IT GENERALLY ACCORD WITH HOUSING MARKET POTENTIAL?)

Question 9 Rural Communities

Homes for Scotland would agree that rural areas offer attractive alternative living environments for people who may wish to work in urban areas. Many development plans take an overly-restrictive approach to rural housing, based on an erroneous

view that new rural housing should be restricted to operational requirements, and to economic development. The countryside is now less-densely populated than at any time in modern history. SPP3 recognises that range and choice should be provided, while emerging work on the replacement for NPPG15 recognises that new population (and hence new housing), as well as new economic activities not directly related to rural resources, in rural areas can have community and economic benefits if planned for at a reasonable scale. That scale should be such as not to detract from the emphasis on the Core Areas and Corridors.

Question 10 More Housing in Countryside

In light of the answer to Question 9, Homes for Scotland agrees that less restrictive policies relating to rural housing should be developed. It may be appropriate to identify areas where, for whatever reasons, new housing is NOT appropriate and otherwise to operate a presumption in favour, subject to criteria-based policies to direct its scale, function and design. Good Landscape Character Assessment is helpful in this respect, provided it takes an historical perspective as well as a current-day one, to recognise that past landscapes supported many more houses than the present.

Question 11 Additional Transport Development

No comments

Question 12 Other Community Regeneration Initiatives

Homes for Scotland would accept that housing can have a role to play in regeneration. However, it should be recognised that housing alone is rarely sufficient to trigger regeneration, and indeed that the development of a stronger housing market in a settlement may only follow other substantial economic and environmental regeneration initiatives.

Question 13 Amount/Location of Future Housing

Homes for Scotland accepts that the broad level of housing set out in Table 2 is appropriate for the aim of stabilising population levels, subject to the caveats expressed under the next question. The distribution of that housing over the 3 Council areas also seems generally reasonable. It is considered that Ayr probably has the most critical role of the three main core settlements identified.

The Plan should conform to guidance by dividing the housing requirement into allocations for the periods 2005 – 2012; 2012 – 2017; and 2017 onwards. That will have to be related to some degree to issues such as forecasts of economic and employment growth, and to matters such as infrastructure constraints. However, it is important that the Plan, and the succeeding Local Plans, takes account of SPP3 paragraph 66 in respect of identifying a policy framework which allows these broad phases of allocation to be readily modified to take account of changing circumstances.

Question 14 Variable Needs and Affordable Housing

Homes for Scotland believes there is a critical issue to resolve in terms of the methodologies employed to project housing requirements in Structure Plans and to assess Housing Needs. At present, the two methodologies are transparently not compatible, partly because one reveals existing or backlog need which the other

does not account for, partly because the projections of future affordable housing needs are so obviously out of line with general projections of housing requirements.

South Ayrshire offers a topical example, where the Housing Needs Assessment produces levels of future need which represent the vast majority of the total need projected by the approved Structure Plan. Given the evidence of the housing market in South Ayrshire, this is patently illogical. Guidance requires that development plans and Local Housing Strategies are aligned, but at present methodological problems clearly exist to prevent this.

Development Plans and Local Housing Strategies also need to be aligned in terms of identifying the most pressured areas and areas where priority may be given to securing affordable housing. It is clear that needs vary significantly across Ayrshire, with parts of all three Council areas having no needs at all. Where need can be demonstrated through robust Housing Needs Assessments, then the Development Plan should show the requirements separately for private housing and other tenures.

In terms of housing delivery, Homes for Scotland believes that development plans should be concerned with the identification of land for appropriate and necessary development. Where a need for affordable housing clearly exists, Homes for Scotland has no difficulty with the concept of allocating land in plans specifically for affordable housing. Likewise, it does not object in principle to proportions of sites being reserved for affordable housing provided:

- The proportions are reasonable – plans must take account of the impacts on viability and speed of delivery of excessive requirements on individual sites, particularly when other developer contributions may be sought
- The size thresholds of sites are reasonable (generally in excess of 50)
- A full range of types of affordable housing is recognised, in line with guidance
- Requirements are not introduced before Plan adoption, for instance through Supplementary Guidance, in order that a reasonable lead time is given to landowners and developers to take account of emerging requirements
- Detailed procedural guidance for the implementation of the housing is drafted in advance of Plan approval in consultation with the industry

A negotiated approach to affordable housing is far more likely, in Homes for Scotland's view, to produce workable policies.

Question 15 Future Industrial Requirements

Homes for Scotland agrees that a review is needed of historic industrial and business land allocations. There is a tendency in development plans to retain allocations even in the face of substantial over-supply, which can at times prevent fresh thinking on the need for new business locations. The Draft Plan recognises these issues, and raises the potential for re-use of industrial land for housing, commercial uses and mixed use schemes. Indeed, there may on occasion be arguments for returning former industrial land to open space or landscaped areas.

Question 16 Retail in Town Centres

Homes for Scotland would generally agree with the principle of concentration in major centres. However, it has to be recognised that strategic development locations may be developed through a mixed-use approach, and that an element of retail is often necessary to make such development viable.

Questions 17 – 22

Homes for Scotland has no comments.

Question 23 Landscape Designations

Homes for Scotland would agree that, on balance, local landscape designations are not especially helpful. In the context of a Plan promoting substantial physical growth of settlements, it would be difficult to devise local designations and define them on Plans without some conflicts emerging with long-term settlement expansion.

The development and use of Landscape Character Assessment appears to offer a more helpful way forward. Landscape character issues can be built into criteria-based policies for the direction of development, and can be carried through into Master Plans and development briefs.

The current Development Plan includes Green Belt designations around Ayr, Prestwick and Troon. In light of the proposed strategy of focussing on core areas, it is suggested that the Green Belt designations require review to ensure that the scale of development envisaged in the Core Area can be accommodated.

Question 24 Protecting the Urban Edge

This question appears contradictory to Question 23, in that no local landscape designations appeared to be proposed. Landscape designations in relation to urban edges would be particularly difficult given that the Plan is seeking long-term sustained growth of settlements. Therefore to devise designations, and the “lines on plans” which would go with them, would be extremely difficult in the context of a 20-year planning horizon. Local Plans, however, would presumably continue to deal with a 10-year horizon, but if urban edge designations were pursued Plans would have to effectively identify land for development beyond the 10-year horizon of the Plan.

Homes for Scotland’s reading of recent guidance is that the Scottish Executive envisages Plans which give longer-term spatial guidance on the broad directions and scales of development. Such an approach does lend itself more readily to a criteria-based approach to directing development which does not sit well with formal designations and boundaries.

Questions 25 – 27

Homes for Scotland has no comments.

Additional Comments

A requirement of new guidance on development plans is the production of an Action Plan to accompany the physical proposals, showing linkages between the elements of the proposed strategy, the key infrastructure and other requirements, the scale of resources needed to achieve the strategy and the partners who can deliver the strategy.

The Plan should make reference to develop contributions and set out an approach to securing these based on the established principles of Circulars 12/1996 and 4/1998. The development industry is not opposed in principle to fair and reasonable expectations that it will fund infrastructure necessary to mitigate impacts, but it is

opposed to a general assumption that private funding should substitute for public funding of services and amenities unrelated in scale and kind to development.

BM

1 September 2004