

REPORT TO: ENVIRONMENT & REGENERATION COMMITTEE

REPORT BY: DEPUTE CHIEF EXECUTIVE

ORIGINATOR: HEAD OF PLANNING SERVICES

**SUBJECT: AYRSHIRE JOINT STRUCTURE PLAN 2025:
CONSULTATION DRAFT 2025 - A RESPONSE**

1.0 PURPOSE OF REPORT

1.1 The purpose of this report is to inform the Committee of the publication of a Consultation Draft for the replacement of the Ayrshire Joint Structure Plan, and to recommend a response which emphasises those matters in the Plan that are likely to affect Inverclyde.

2.0 BACKGROUND

2.1 The Ayrshire Joint Structure Plan and Transportation Committee comprises the three authorities of East, North and South Ayrshire. The Ayrshire Joint Structure Plan (AJSP) was the first such post-reorganisation joint structure plan to be approved by Scottish Ministers, in January 2000 [refer to previous Committee Reports, **Min Refs: 13/08/98, para 822 and 10/08/99, para 1149**]. This replacement plan rolls forward the planning horizon five years, to 2025. It follows consultation in late 2003 on the potential issues that the plan might address, and the outcome in this draft signifies a significant change in direction for the future planning of Ayrshire.

2.2 As with other consultations on neighbouring joint structure plans, in parallel with this Council's response is the joint one on behalf of the Glasgow and the Clyde Valley Structure Plan Joint Committee (GCVSPJC). The key points raised in the Joint Committee response are attached as Annex 1. Those matters considered of significance in this response to Inverclyde are incorporated in this report.

2.3 Circulated with the consultation draft plan are 26 questions to assist the process. However, most of these questions are directed at the local councils and communities in Ayrshire, the local business community and the statutory agencies with responsibilities in Ayrshire. The discursive nature of the Draft Plan and questions posed are also of a very general nature and therefore, without further clarification of the technical background and assumptions used in the Draft Plan, the focus of this response is on the one overriding issue which dominates: the preferred vision and strategy which requires a significant scale of housing land release. This response therefore, is relevant to only question nos. 2 and 13, of the AJSP's response form.

2.4 Due to the uncertainty over the rationale and technical assumptions underlying the Draft Plan, it is the intention of the Structure Plan Manager for the GCVSPJC to reserve his position at this stage, and seek dialogue with our Ayrshire colleagues (refer to Annex 2). It is suggested that an officer in the Inverclyde Planning Service should be involved in these discussions. The closing date for consultation on the AJSP was Friday 27th August. The AJSP Manager has been informed of our committee cycle and has acknowledged that this Council's formal response would be forthcoming after this committee meeting.

3.0 CONSULTATION DRAFT of the AJSP 2025 – A RESPONSE

3.1 The AJSP Consultation Draft sets out an ambitious and extremely aspirational vision for Ayrshire against the background of a changing legislative framework for structure planning, and it is the first structure plan to be reviewed since the Scottish Executive Development Department (SEDD) published its National Planning Framework, in April 2004 (a non-statutory policy document setting out its long term vision for Scotland). The AJSP Joint Committee has concluded that in order to reflect “the difficult economic and social circumstancesand the emerging environmental agenda”, and respond to the monitoring and review of the three authorities’ local plans (based on the approved AJSP), a *replacement* joint structure plan should be produced rather than simply undertake a review of the current plan.

3.2 An early influence on the decision to replace the current policy directions of the AJSP was the 2003 Ayrshire Economic Forum’s economic development strategy ‘Ayrshire: Scotland’s Western Gateway’. This it is claimed demonstrates how Ayrshire could make a major contribution to the growth of Scotland, and in tandem, create the conditions for “its own people to share in that prosperity”. This publication provides the planning context for the area, and incorporated within this context, are six issues that represent the Plan’s foundations. These are based on:

- (1) Economic Prosperity
- (2) A Future for Communities
- (3) Housing Land Investment
- (4) Transport and Public Service Infrastructure Support
- (5) A Green Future
- (6) Rural Ayrshire.

3.3 On the basis of the above and taking each of these elements as part of a coherent and integrated package of measures, the Plan is divided into three main sections, the first establishing:

- (A) the future population levels on which the Plan is based (to 2017 & 2025), and its ‘Spatial Development Strategy’, followed by,
- (B) specific policies related to ‘Investing in Communities’; and
- (C) the ‘Protection of the Natural and Built Environment’.

The aspirations contained within (B) and (C) above are laudable and are to be commended. As matters that a joint structure plan should address, such as the major regeneration initiatives (eg. Glengarnock and Ardeer), the particular problems of the coalfield communities in East Ayrshire, strategic business locations and the investment required in the designated town centres, this response does not dwell on these. It is the first overarching aspiration concerning the future population level to be planned for, the implications this would have for housing land release and therefore, neighbouring authorities, that is the focus of this response.

3.4 However, it should be noted in Annex 1 to this report that the GCVJSP Committee’s response also raises concerns over the number, scale and form of the ‘Investment Corridors’, three of which are in North Ayrshire, which could have implications for Inverclyde.

The Key Issue – Assumption of Stable Population and Future Housing Demand

3.5 The question is posed in the AJSP as to whether its spatial development strategy should be based on recent performance, in terms of “persistent and unacceptable problems of a falling population, unemployment and social disadvantage”, which has been compounded by recent economic performance that “has been poor relative to many other areas of Scotland”, or whether there should be an attempt to stabilize the population at current levels. While asking if this is a strategy that would be realistic, the AJSPJC does propose to shift the current emphasis away from consolidation to a more broadly based strategy aimed at realising “the potential throughout Ayrshire to create economic prosperity through competitive advantage.” The key drivers of the local economy however, are not outlined in the Draft Plan.

3.6 The Plan’s preferred strategy, therefore, seeks to minimise population loss by setting an aspirational target to arrest decline, and an explicit assumption is made of ‘no net out migration’ and a ‘stabilisation of the population to the 2005 figure’. The consequential estimates of a housing land ‘shortfall’ of 20,000 dwelling units, and a total housing land requirement of some 34,000, by 2025, would clearly have a very serious impact upon the Glasgow and Clyde Valley area, and potentially, Inverclyde. This total is some 3-times what it would be if based on national (GRO(S))-based household projections. Such an assumption of ‘a stable population’ would require a considerable annual in-migration of population from day-one, which presumably would largely originate from the Glasgow and Clyde Valley area, including from Inverclyde. Support for the AJSP’s preferred strategy and the assumptions underlying it are found in the Scottish Executive’s recently published National Planning Framework.

3.7 The AJSP finds support for its strategy in paragraph 61 of the National Planning Framework, where it states: “trends (of differential rates of population decline projected to continue, and differential rates of household growth, equally projected to continue) have important implications for development in the period to 2025. Increases in the number of households will translate into a requirement for additional houses. However, household projections are based on past trends and should be regarded as indicative rather than as intimations of a preordained future. The recovery evident in areas as diverse as Glasgow and Skye points to the scope for turning around areas which have experienced decline.” (my emphasis).

Comment on the AJSP’s Preferred Spatial Development Strategy

3.8 The aspiration of the AJSP is not that dissimilar to the GCVJSP’s assumption of zero net out-migration, by 2020, and indeed, the aspirations of this Council, expressed in a similar ‘population target’ in the Inverclyde Local Plan: First Review. However, the GCVJSP, our own Local Plan and others within the Glasgow and Clyde Valley area, in accordance with the GCVJSP and national planning policy, are based on a strategy dominated by urban containment and the sustainable development of brownfield, and where possible, waterfront land.

3.9 The significant difference in Ayrshire is that their Plan appears to have little in economic terms to justify this level of population and so the desire for growth would be entirely housing-led and involve long-distance commuting. This is illustrated in the proposed ‘target’ allocation for North Ayrshire, of some 11,400 dwelling units, to 2025, of which 4,600 units would be required through new planned releases of land. This potential scale of land release compares with an equivalent requirement for new land of 785 for the whole authority, including Irvine, for the period to 2009, in the

Finalised Local Plan (February 2003) [Min Ref: 05/03/02, para 222]. Within this 'target', the North Coast & Arran 'Investment Corridor' (which includes Skelmorlie, Largs, Fairlie and the three towns of Ardrossan, Saltcoats and Stevenson), has a proposed allocation of 1,300 dwelling units. To provide another indication of this potential scale of housing release, completions over the last ten years in North Ayrshire have been on average 490 per annum; this level of provision would be some 15% higher at 570 per annum.

3.10 The location of any housing release is fundamental, since such a strategy by the Ayrshire authorities would require a land allocation that is heavily dependent upon greenfield release and therefore, contrary to national planning policy. In this respect, while the GCVJSP has a similar aim in terms of sharing in national growth, both economically and in any increase in future population, the land use planning implications in Ayrshire would be quite different. Moreover, the GCVJSP accords with key elements of national policy, not least the Cities Review and the promotion of growth at the city region level, given equal emphasis in the National Planning Framework. In this respect, confirmation and endorsement from the SEDD of the GCVJSP's approved position - and within it, especially, Glasgow, Inverclyde and West Dunbartonshire with respect to regeneration and renewal - would provide firmer guidance and the means to handle situations like this where local authorities are taking considerable support from aspects of the National Planning Framework, rather than the full national context presented.

3.11 However, National Planning Framework should include the SEDD's view of the implications of this 'growth-based future' for the relative balance of development across Scotland (by structure plan, or City Region). Without this sub-national context, there is currently no national basis for local authorities to review their plans and be confident of what scales of land release would be required to redress the imbalances and uneven development that has occurred in the country over the last 10-15 years. Without setting this 'growth-based future' (with nil net out-migration from Scotland), alongside a 'trend-based future' and what each would mean for the different parts of the country, the SEDD will be unable to assess and come to a view on what the Ayrshire Joint Structure Plan is proposing (nor any other plan), and what it could mean for the adjoining local authorities and our own structure planning area.

Specific Potential Impact on Inverclyde

3.12 The special circumstances in Inverclyde that are recognised in the GCVJSP provides this Authority with the means to bring forward a larger established housing land supply than would otherwise be justified by official population projections and best estimates of household growth. This is incorporated in the First Review, Final Draft Local Plan, with its medium-to-longer term timeframe central to the Plan's Development Strategy. This established land supply is entirely in accord with national planning policy, to maximise development on brownfield land. Any greenfield sites in the land supply are inherited from previous planning permissions, including those where the Council has not been able to revoke them (eg. Hill Farm, Inverkip).

3.13 The Local Plan's Development Strategy seeks the reversal of the population drift to the west of the authority from Greenock and Port Glasgow. This should be assisted by having a policy of restraint in the west of the Inverclyde HMA, and the stimulation of development in the centre and east through the 'new neighbourhood' area renewal initiatives and the waterfront regeneration along the A8 Greenock-Port Glasgow corridor. If Inverclyde's waterfront regeneration and 'New Neighbourhoods' initiative does not get underway on a sufficient and meaningful scale over the plan

period (to 2010), there will inevitably be a serious threat to its successful implementation if significant land releases were made in Ayrshire within this period.

3.14 The strategy promoted in the AJSP would only serve to undermine the regeneration of Inverclyde. This could be doubly serious, since there would be little to be gained by Inverclyde continuing to restrict development in its western coastal settlements, if 'just down the coast', the Ayrshire authorities promoted more housing development than is required, with land releases in locations with a recognisably more favoured environment than that available, at least currently, in Inverclyde.

4.0 CONCLUSION

4.1 To a considerable degree the full implications of the AJSP's preferred growth strategy is more a matter for the SEDD and their National Planning Framework, than the GCVJSPC, or other adjoining authorities that would be affected by their proposals. The SEDD will need to respond to the AJSP in a way that does not undermine compatible, realistic and sustainable sub-national strategic planning in Scotland. As a start, clarification will be required from the SEDD on what is intended in the sentiments expressed in paragraph 61 of the National Planning Framework. The 'sea change' anticipated in Scotland's economic performance and population – 'the growth scenario' – will need to be placed within the context of other national planning aims and priorities, not least the desired focus for development to be City Region based and with a continuing preference for development to be on underused and vacant brownfield and waterfront land.

4.2 If other local authorities were to adopt similar justifications for making unrealistic and incompatible assumptions of population growth at sub-national level for the next 20 years, and equally excessive housing land releases in their plans (City Region and Local Development Plans), the SEDD's National Planning Framework just published will have been undermined from the outset.

5.0 RECOMMENDATIONS

5.1 The Committee is asked to:

- (a) note with concern the potential implications of the preferred spatial development strategy proposed by the AJSP Joint Committee;
- (b) endorse the response outlined in this report as those matters of most concern to the future development of Inverclyde; and
- (c) note that the Head of Planning Services will be part of the discussions proposed by the GCVJSP Structure Plan Manager, on behalf of the GCVJSP Joint Committee, with our colleagues in Ayrshire.

ATTACHMENTS

- Annex 1: The GCVJSPC - Key Issues Raised on the AJSP: Consultation Draft
- Annex 2: The GCVJSP Structure Plan Manager's Holding Letter to the AJSP Manager, re Consultation Draft Response (26th August 2004)

ATTACHMENTS

Annex 1: The GCVJSPC - Key Issues Raised on the AJSP: Consultation Draft

- (1) The Vision expressed in the Plan
- (2) The Proposed Population Assumptions
- (3) The Scale of Housing Provision
- (4) The Proposed Scale and Form in the Investment Corridors
- (5) The relationship between the transport proposals in the Joint Transport Strategy (Westrans)
- (6) The Proposed Wind Farm Search Areas.

Annex 2: The GCVJSP Structure Plan Manager's Holding Letter to the AJSP Manager, re Consultation Draft Response (26th August 2004)

[attached]

Head of Planning Services
Cathcart House
6 Cathcart Square
Greenock

31st August 2004

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