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

**PUBLIC CONSULTATION
GROWING AYRSHIRE
AYRSHIRE JOINT STRUCTURE PLAN 2025: CONSULTATION DRAFT
MCINALLY ASSOCIATES ON BEHALF ON CLYDEPORT PLC**

Please find enclosed our response to consultation draft of the Ayrshire Joint Structure Plan 2025.

We are submitting a response on behalf of our clients, Clydeport PLC.

Should you have any queries on this representation please do not hesitate to contact us.

Yours faithfully,

**TOM MCINALLY
MCINALLY ASSOCIATES LTD**

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

The vision statement set out in the Consultation Draft appears to outline the most logical approach to achieving the goals which Ayrshire should be aspiring to. It is suggested that integration is essential to attain such aspirations and as such encouragement should be given to increased co-operation between planning authorities and the private sector to achieve greater prosperity and economic competitiveness as well as a higher quality of life for the residents of Ayrshire.

Question 2. Future population projections based on recent performances 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?

While population loss may be expected, it should not be accepted as merely a trend which cannot be halted or reversed. It is suggested that while such a challenge may be difficult to overcome, Ayrshire should be attempting to tackle this and that stabilizing population levels is a target which must be aimed for. This can be aided by ambitious plans for developable land which will offer employment, a high standard of living conditions and quality homes in order to create a region which will attract new residents and convince those brought up there to remain and pursue a career whilst nurturing a family.

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

It is felt that the seven principle aims outlined are appropriate and should be ardently pursued. Of particular importance are the aims of encouraging economic development, the promotion of strong and vibrant communities, and the repositioning of business locations to maximise economic growth. It is obvious that the stimulation of economic growth is one of the most pressing concerns and one which will go a long way to realising Ayrshire's potential.

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 inclusion of Hunterston as a Gateway Location is welcomed. It is felt that this area has the potential to encourage people to invest and live in Ayrshire due to the opportunities for redevelopment which exist here. Ambitious development of Hunterston can catalyse economic growth in the area and should be given utmost priority in order that this may be achieved. In order to develop Hunterston to its full potential Clydeport seek a flexible approach to the definition of uses which would be considered acceptable on this site to include the following:

- Container hub,
- Pulp mill,
- Oil rig decommissioning,
- Renewable energy / wind turbines.

Additionally, our client believes that the Ardrossan harbour area also has potential for inclusion as a Gateway Location due to levels of brownfield land and the existing ferry link.

Question 5. Do you agree that the area surrounding Ayr, Irvine and Kilmarnock located within the Core Investment Area should be the main focus of future development?

This area would obviously be most accessible by the largest grouping of people in Ayrshire. This would make it the most logical choice for the main focus of development in the future. However, whilst this core area should be the main area of development, the satellite areas around this core should be integrated into any future development so they may offer alternative service provision and high quality homes whilst being effectively linked with this core area by means of adequate transport infrastructure.

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 along main transport routes, through existing population concentrations, is a logical step in efficiently linking Ayrshire and will aid in encouraging economic growth. Whilst the main focus of development will be within the Core Investment Area, it is important that outlying areas are not neglected so they do not stagnate and begin to decay. Investment Corridors will help to ensure this does not happen. However, it is also of paramount importance that there is a high level of investment in public transport provision along these corridors so they do not simply evolve into high capacity car routes.

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

These towns must develop efficient transport links whilst also being effectively linked to the surrounding communities. Development taking place outside of these towns must be linked to the Core towns to enable them to provide services not available outwith these areas. In particular, our client is keen that there is ease of transport for both private car and public transport between Ardrossan harbour and Hunterston and the Core Development Area.

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

It is agreed that Ardrossan has significant development potential and it's inclusion as a service centre is justified.

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

Rural communities have an important role to play in the development of the economy. They can provide quality housing, transport links and small scale service provision. It is felt that they have a particularly significant role in linking areas throughout Ayrshire, particularly along Investment Corridors. This can be an important tool in the growth of the economy in Ayrshire.

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

It is imperative that Ayrshire's countryside be maintained and nurtured, housing should only be built in the countryside when all other alternatives have been exhausted. Priority should be given to housing proposals on brownfield land and then on greenfield sites surrounding existing settlements in accordance with national guidance and sustainable development principles.

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

The transport proposals are welcomed and in particular it is felt that the improvement of rail and road links to Hunterston will be of benefit to the region as a whole and hopefully stimulate growth in the freight and distribution industry. Not only will the improvements offer greater development potential to Hunterston, they will provide an important link to the smaller communities along these routes. Additionally they will also provide greater access to Ardrossan and the ferry services based there.

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

Ambitious levels of housing should be allocated to ensure there are no shortfalls in the future. These should be allocated to Core Towns, Investment Corridors and Gateway Locations to ensure a high level of accessibility although smaller scale housing developments will obviously be required in smaller communities.

Question 14. Should strategic planning policy set appropriate targets and mechanisms for the delivery of affordable housing? If so, on what criteria should it be based?

It is considered that placing affordable housing constraints on private developers will only result in driving investment away from Ayrshire. Although there is a current shortfall of affordable housing, developers will not invest in Ayrshire if strict conditions are placed on private housing developments regarding affordable housing.

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

Our client welcomes the assessment of industrial land and the proposals regarding obsolete land and the oversupply of industrial land in Ayrshire. It is felt that flexibility is required towards development proposals on industrial brownfield land in order to stimulate investment and remove the negative market impact of oversupply. A flexible approach to development proposals (consideration of change of use to housing, commercial or different industrial use) on such land will lead to increased prosperity in the region.

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 the main focus for future retail provision should be in town centres. Neglect in this area can quickly lead to urban decline. However, smaller scale retail projects in smaller communities must be considered on their own merits as similarly, neglect in this area can lead to decay of smaller towns, villages and communities.

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

As previously mentioned in question 4, our client wishes recognition that acceptable uses for the Hunterston site would include, among others, a pulp mill. With the expected increase in mature timber and the proposed improvements to the road and rail links to Hunterston, this would appear to be an ideal opportunity to promote the use of Hunterston as a pulp mill to deal with this expected increase.

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

We have outlined below why Hunterston should be considered as a site for renewable energy provision or a pulp mill which could be used in conjunction with a bio-mass power station. Were these changes in use to be approved, the local community would obviously benefit from increased levels of employment.

Question 19. Two potential areas for commercial wind farm development have been identified, are these areas suitable? Should further areas be identified?

Again, as previously mentioned in Question 4, our client wishes Hunterston to be recognised as a potential site for wind farm development. It is felt that inclusion of Hunterston as a site suitable for a wind farm or other renewable energy development would be a logical step in contributing to national renewable energy targets and diversification of use at Hunterston.

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?

This concept could have widespread benefits for the region and provide much needed employment. Were Hunterston to be reclassified to allow partial use as a pulp mill, this coupled with the improvements to the transport network would make a nearby bio-mass and co-fired power station a logical step. Local communities would benefit from increased employment levels and possibly even excess energy from such a power station.

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?

It is felt that tourism promotion is certainly a market which Ayrshire should be growing in. The promotion of the plentiful natural and cultural resources can benefit the whole region but in particular, smaller communities who may be able to capitalise on any increase in tourism more than in any other industry.

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

Obviously there is development potential, which should be maximised, at existing sites along the coast such as Hunterston and Ardrossan. However, selected untouched and unspoilt areas of the Ayrshire coast should be protected and enhanced through the planning system.

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?

In order to stimulate much needed economic growth, a lack of landscape designations is considered a sensible step to encourage investment and development without placing excessive costs on the developer and jeopardising investment.

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

Policies supporting protection of the green belt / countryside should be the primary vehicle for protecting the urban edge whilst consideration of coalescence, ribbon development and urban sprawl should also be given priority.

Question 25. 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?

New legislation in the above areas provides an opportunity to improve the environmental stock throughout Ayrshire whilst simultaneously improving quality of life. However, this must be balanced against the need to encourage investment in Ayrshire and stimulate business and population growth. The proposed plan appears to cover these options adequately without placing rigid requirements on the planning system which will allow flexibility to achieve other goals.

