

RENFREWSHIRE COUNCIL

TO: PLANNING AND DEVELOPMENT POLICY BOARD

BY: DIRECTOR OF PLANNING & TRANSPORT

DATE: 14 SEPTEMBER 2004

SUBJECT: Growing Ayrshire - Ayrshire Joint Structure Plan 2025 - Consultation Draft

1 **Summary**

1.1 The Ayrshire Joint Structure Plan Committee has issued a consultative document on its proposed replacement Structure Plan. Responses are due by 27th August 2004. The consultation document raises a number of important issues relating to the future development of Ayrshire, many of which will be similarly raised in the forthcoming review of the Glasgow and Clyde Valley Joint Structure Plan. The responses suggested in the consultation document raise issues of concern for the Glasgow and Clyde Valley Joint Structure Plan and for Renfrewshire Council. The consultative document is a discursive document and does not contain draft policies and proposals. It also contains a series of questions to provide a framework for responses. This report considers some of the main issues of concern to the Council and provides responses to the questions raised in the consultation document.

This report has been sent as a preliminary response to meet the required timescales and the Ayrshire Joint Structure Plan Joint Committee have been informed that it may be subject to change as a result of the Board's decision.

2 **Recommendation**

2.1 It is recommended that the Board approve this report as the Council's formal response to the consultation.

3. **Background**

3.1 The Council welcomes and supports the review of the Ayrshire Joint Structure Plan which will continue to provide an up-to-date strategic planning framework for the three Ayrshire Councils. The Council however has concerns that some of the main aspects of the Consultation Draft are based more on aspiration than on practical and achievable ends and proven methods and mechanisms. This is evident in the discussions of population targets and in transport issues.

Population

3.2 The key aims of the document appear to be based on aspiration rather than sound justification and proven success in tackling existing problems. For example it states in paragraph 2.5

“Despite strenuous efforts and some notable success there remain persistent and unacceptable problems of a falling population, unemployment and social disadvantage. This is compounded by the fact that recent economic performance has been poor relative to many other areas of Scotland.”

In paragraph 2.12 it states

“The replacement structure plan therefore proposes to shift the emphasis away from the previous joint structure plan’s approach of consolidation to a more broadly based strategy of realising potential throughout the area to create economic prosperity through competitive advantage. The plan will seek to minimise population loss by setting an aspirational target to arrest decline and then to grow the population and this will be the subject of consultation. By seeking to stabilise the population at current levels, Ayrshire can be seen to contribute positively to national aspirations for population growth.”

- 3.3 This approach appears to minimise the practical difficulties of regeneration and economic development and instead seeks to resolve what are recognised as persistent and long term problems through setting aspirational targets for house building. The Structure Plan requires to adopt realistic and achievable targets and to include policies which will demonstrably achieve these. There is a danger that if over optimistic options are selected which result in excessive releases this can be counter productive to regeneration and sustainable development as new development may be diverted from renewal and regeneration to green field sites. Renfrewshire Council has concerns over the potential impact which large releases of housing land may have on patterns of migration and on patterns of travel, particularly journeys to work.
- 3.4 The Glasgow and Clyde Valley Joint Structure Plan committee will make a submission on behalf of the eight constituent authorities and this will cover, among other things, an assessment of the technical notes relating to population and housing land supply estimates. The Council would expect that the finalised Structure Plan will fully assess and justify the following issues
- The level of in-migration required to support the chosen population targets
 - The level of housing land release and any factor of flexibility included in calculations
 - The level of economic activity within the Ayrshire Structure Plan area which will support the target population levels
 - The implications for and interrelationship with the development plan policies in adjoining authorities, in particular the Glasgow and Clyde Valley Structure Plan and the constituent authorities which adjoin the Ayrshire Structure Plan area including Renfrewshire Council.

Transport

- 3.4 The discussion on transport does not appear to give a particularly high priority to sustainable transport modes in preference to the private car. Accessibility to employment and access to Glasgow International Prestwick Airport (GIPA) are clearly key issues which require to be given priority and it is acknowledged that the National Planning Framework identifies the need to improve connectivity between Ayrshire and the Central Belt to secure better integration of the Ayrshire and Central Belt economies. But

improvement of roads, without measures to restrain the growth of car traffic, which appears at least in part to be aimed at increasing long distance commuting to the Glasgow conurbation, does not accord with sustainable principles. Scottish Planning Policy (SPP) 1 makes clear the need to ensure that the labour force has easy access to places of employment and supports the reduction of the number and length of journeys in both urban and rural areas (SPP1 Paragraph 20). SPP3 (for example paragraph 35) advises that the planning of new development should seek to reduce the demand for travel and reliance on the private car. It points out (paragraph 27) *“Housing is the most extensive development land use in any settlement. The relationship of homes to other uses has a large potential to influence travel demand in terms of transport type and length of journey.”* There is a need to recognise that the changing population levels recorded in the Consultation Draft may well reflect the choices of the workforce to reside close to employment opportunities and that the promotion of long distance commuting does not accord with SPP1.

If the strategy for sustaining population actually encourages a migration of people from the Greater Glasgow conurbation into Ayrshire, the principal of sustainable development could be compromised as people make longer journeys to work. The potential implications of increased population levels for transport in the west of Scotland requires to be fully examined

- 3.5 SPP1 states that Structure Plans should reflect and identify priorities for the provision of infrastructure and identify limitations on development. (SPP1 Paragraph 32) The National Planning Framework (paragraph 11.5) states

“Transport issues will have to be addressed from the outset in planning for future development. They cannot be left to be dealt with as an afterthought. Development plan land allocations will require to be appraised against the capacity of the transport network; where economic growth demonstrates a need for additional supportive transport infrastructure, delivery mechanisms which maintain the balance between development and the transport network will be necessary.”

The list of roads proposals including by-passes and upgrading of strategic routes set out in paragraphs 2.50 to 2.62 therefore requires to be accompanied with a realistic appraisal of priorities, financial implications and the likely programming of these taking account of the roads programmes of the Ayrshire Councils and the Scottish Executive Roads Directorate. It should also reflect the policies and programmes the Joint Transport Strategy for Western Scotland, which has been issued in consultative draft form by Westrans. The Structure Plan requires to incorporate transport proposals which are programmed and likely to proceed; it should relate these to targets for economic growth and population to show how these targets will be supported and achieved; it should also indicate the extent to which the stated aspirations can be achieved taking account of known infrastructure constraints.

Water and sewerage constraints

- 3.6 Constraints arising from Scottish Water infrastructure affect all Councils in Scotland not least the Ayrshire authorities. Indeed this matter is highlighted in the National Planning Framework (paragraph 166). The Consultation Draft does not

deal with this matter in depth. It is understood that drainage and water supply constraints require to be resolved to allow developments within the existing supply of development land to be implemented. In view of the potential high level of land release resulting from the population option which is advocated in the Draft there is a clear need to provide a detailed assessment of current constraints and the potential impact of these on future development.

- 3.7 The Consultation Draft *“recognises that significant support from infrastructure providers and the house-building industry will be required to facilitate the development.”* (paragraph 3.13) In a similar way to its transport investment proposals, the Structure Plan also requires to recognise that the availability of resources from Scottish Water to support new development is likely to remain severely constrained even under Q&SIII. Renfrewshire Council would be concerned that investment may be diverted from locations where demand for development is proven to areas where development is aspirational.

Liaison with Clyde Valley Joint Structure Plan Manager

- 3.8 The Glasgow and Clyde Valley Joint Structure Plan Committee have prepared a response on behalf of the eight constituent Councils and it is understood that the Glasgow and Clyde Valley Joint Structure Plan Structure Plan Manager will seek to liaise with the Ayrshire Joint Structure Plan Manager to seek to establish a complementary approach for the review of the Ayrshire and Glasgow and Clyde Valley structure plans. Renfrewshire Council supports this approach and will wish to engage in this process.

4. **Responses to questions**

Responses to the questions contained in the Consultation Draft are listed below.

QUESTION 1

Does the Vision Statement set the correct agenda for the future?

RESPONSE: No comment

QUESTION 2

Future population projections based on recent performance suggest that Ayrshire will face a considerable loss of population. Is this trend acceptable or should there be an attempt to stabilise the population at current levels? In the light of recent projections is this realistic?

The concerns expressed in respect of forecast population change are understandable and it is wholly appropriate to consider the accuracy of the GRO estimates and alternative options for future population levels. However, the option which is finally selected requires to be fully assessed and justified and should not be based solely on aspirational preferences. The selected option must be:-

(a) Achievable - for example in terms of the ability to overcome existing constraints, particularly drainage and transport and the ability to meet desired levels of development which have not been recently evident.

(b) Realistic - whilst the structure plan policy should not be solely determined by past trends, these trends can and do reflect changing preferences, work patterns and life

styles of the population. The Structure Plan requires to clearly demonstrate that the selected option is compatible with the changing patterns of life represented by recent trends.

(c) Sustainable - It is noted that the Joint Committee propose to undertake a Sustainability Appraisal in parallel with the preparation of the Structure Plan. It is essential that the option selected is fully tested in relation to sustainability matters. In particular attention should be given to the implications of potentially extended travel patterns which may arise if higher levels of population are to be achieved through the attraction of persons who work within the Greater Glasgow conurbation

(d) Accord with national and strategic policies and forecasts - The selected option must accord with National Planning Policy and the approved structure plans for adjoining areas, in particular the Glasgow and Clyde Valley Joint Structure Plan. It must have regard to the patterns of population change in the wider area and not be in conflict with or at the expense of other areas which also require to deal with changing population levels.

QUESTION 3

Are the seven principle aims of the strategy appropriate?

RESPONSE: In respect of bullet 1 in paragraph 2.15 it would appear that whilst the future population levels are presented as options in paragraph 2.13 and Table 1, the principle aims include the highest population option as one of the established aims of the plan. The comments in respect of Question 2 require to be addressed before this aim is adopted.

In respect of bullet 5 the word “sustainable” should be inserted between the words “improved” and “accessibility”

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?

RESPONSE: No comment

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?

RESPONSE: No comment

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?
and

QUESTION 7

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

RESPONSE: The potential for economic development in the Core Investment Area Towns and in the Investment Corridors requires to be fully established and employment

levels should be used to guide the decision on the selection of the population option. The population level set within the Structure Plan should be based, in the first instance, on the ability of the Ayrshire economy to support it, and should not be predicated on increased levels of long distance commuting.

If economic growth is achieved, this will attract residents. Economic growth will not be achieved solely by attracting residents who commute out of the Structure Plan area.

QUESTION 8

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

RESPONSE: No comment

QUESTION 9

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

RESPONSE: No comment

QUESTION 10

Should more housing be built in the countryside?

RESPONSE: Whilst not wishing to comment on the particular issues of housing in the countryside which pertain to the Ayrshire Councils it is to be expected that the Structure Plan will continue to fully accord with National Planning Policy on this matter.

QUESTION 11

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

RESPONSE: Comment is made above in paragraphs 1.4 and 1.5 in respect of the aspirational nature of certain of the transport proposals. It is considered that the main questions to be levelled at the transport proposals are:-

- the extent to which the emphasis on road development fits with principles of sustainability
- the extent to which these can be practically achieved within current financial constraints
- the extent to which their implementation will be required to support the optimistic population targets
- the extent to which they are required to facilitate increased long distance commuting to the Glasgow conurbation.

Of particular relevance to Renfrewshire Council are

- Improvements to Glasgow - Paisley rail line
This is associated with the Glasgow International Airport rail link (paragraph 2.52)
The support given to this is welcomed as is the recognition that it will provide potential for increased services to Ayrshire.
- Proposed improvement of A737 Kilwinning to Howwood
Whilst the Council is keen to support improved road conditions it has severe reservation over the potential implications of the implementation of such a scheme without parallel measures to restrain the growth of car traffic and measures to

accommodate the resultant flow of private cars on the M8 between the Glasgow International Airport and Glasgow city centre. The improvement of the M8 and road links to the Glasgow International Airport form part of the Second Alteration to the Glasgow and the Clyde Valley Joint Structure Plan - Expansion of the Glasgow International Airport. The Council will wish to be assured that any increase in capacity which is aimed primarily at sustaining the growth of the Glasgow International Airport is not taken up by long distance commuter traffic.

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?

RESPONSE: No comment.

QUESTION 13

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

RESPONSE: As stated above the Council is concerned that new housing development should not be predicated on long distance commuting. It therefore has concerns over the second part of the fourth criterion for New Housing Release in Schedule 2 which states that new housing should be accessible to employment opportunities outside Ayrshire and has no reference to sustainable transport or measures to restrain the growth of car traffic.

QUESTION 14

How should strategic planning policy address variable needs and delivery mechanisms for affordable housing?

RESPONSE: No comment.

QUESTION 15

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

RESPONSE: No comment.

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?

RESPONSE: Whilst not wishing to comment on the particular issues of retailing it is to be expected that the Structure Plan will continue to fully accord with National Planning Policy on this matter.

QUESTION 17

How can timber resources and the timber industry be promoted?

RESPONSE: No comment.

QUESTION 18

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

RESPONSE: No comment.

QUESTION 19

Two potential areas for commercial wind farm development have been identified, are these areas suitable? Should further areas be identified? What constraining factors do you envisage to future wind farm development?

RESPONSE: Renfrewshire Council has worked with the Joint Structure Plan Team, North Ayrshire Council, Inverclyde Council and the Manager of The Clyde Muirshiel Regional Park with a view to agreeing a common policy approach for the Park. A draft Policy Framework Guidance Document has been agreed by the Joint Committee and the Council looks forward to continuing joint working on this issue where there are matters of mutual concern.

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? Are there other areas that can be identified?

RESPONSE: No comment.

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?

RESPONSE: No comment.

QUESTION 22

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

RESPONSE: No comment.

QUESTION 24

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?

RESPONSE: No comment.

QUESTION 25

How can mineral resources be managed in a sustainable way?

RESPONSE: No comment.

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