

**Greta M. Roberts. M.A. Dip.T.P. Town Planning Consultant.**  
 8, Main Road, Waterside, Kilmarnock, Ayrshire. KA3 6JB  
 Tel. & Fax:- 01560 – 600349. e-mail:- [robertsplace@waitrose.com](mailto:robertsplace@waitrose.com)

Ian Johnson:

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Manager:Ayrshire Joint Structure Plan.  
 15 Links Road,  
 Prestwick.  
 KA9 1QG

### **Comments on AJSP: Consultation Draft 2004.**

Q1: Vision Statement:-‘Ayrshire will be a place etc’..sounds like-  
 ‘Scotland will have a new Parliament’!

Suggest: ‘**We shall aim** ( all of us, not just AJSP Planners)-  
 to make Ayrshire a place.....

...a healthy attractive environment.....

...for ‘expected’,- perhaps substitute ‘attainable’.

Q2: Scotland is under-populated: SE England is overcrowded and ‘over-heating’.  
 So the AJSP 2025, should aim to stabilise or increase the population,- in order to support  
 the basic infrastructure;- but not necessarily aim to stabilise/increase population in every  
 existing settlement.

Q3: 7 Aims: Suggest an additional aim:

‘To support inward migration: to reduce outward migration .’(under aim3)

Who will decide which are the areas with the greatest potential for economic growth:-  
 Investors, planners, politicians?

Investment corridor could be wrongly selected for the wrong reasons, by the wrong  
 people.

Do remember: Dispersal/relocation of industry ( Massey Ferguson/Linwood etc:  
 Decentralisation ( OECD: E Kilbride: SNH Inverness!)

And learn from past ‘history’.

Page 9: 2.16: I have concerns about second bullet point:-

-‘Encouraging appropriate scale developments in open countryside,  
 and improved access to ‘strengthened?’ service centres.’

The financial/environmental cost should presume against such a ‘spatial element’.

Also the appropriateness of TYPE of development should be clarified.

Q4: Gateways: EAC Local Plan recognised more important Gateways:

ie:- for those entering the County by ROAD.

Your Gateways appear to be 3 ports and an airport:- an inadequate definition of  
 Gateway,- in terms of trade, visitors etc.

Suggest Ballantrae/Girvan: New Cumnock: Glenbuck/Muirkirk: Fenwick Moor/South  
 Orbital: Irvine Valley: Largs/Clyde Coast.

Q5: Ayr, Irvine, Kilmarnock, as CI Area Towns: ....Yes.

Q6: Probably, but only a concept in consultants' minds.

Why show Auchinleck/Cumnock with M74 Link?

I expect that the A71 through the Upper Irvine Valley is used more.

No-one seems to have grasped the nettle of where the direct link to the M74 should be.

Q7: A Rhetorical Question?!

Q8: Schedule 1 appears about right, apart from the use of the word '**significant**', to describe development opportunities;- as it is an unquantifiable term,- open to abuse by local authorities and others.

I suggest you simply omit it: It will still represent greater growth potential for those settlements, than merely 'small scale opps'.

Q9: If people are to be attracted to Ayrshire to live/work: or be persuaded not to migrate: or to come on holiday;- ( Tourism is probably our greatest prospect for economic growth), then most of Rural Ayrshire should be protected and UNBUILT UPON>  
It is our greatest asset.

Q10: No: Support & sustain settlements: reduce journeys to work etc by consolidating them.

Q11:Page15- Diagram and p16: 2.50:-

An A71 Bypass for **Hurlford** & a Bypass of the A70 for **Ochiltree** MUST be in this Plan.

2.51: Rail extension to Ayr Hospital should be a low priority, unless the hidden agenda is housing east of the A77 ( passenger-halts etc)

Who goes to hospital by train? Who visits, by train?

Last 'flavour of the month' was a rail-halt for a football stadium nearby!

2.51: Double track or loop between Kilmarnock and Barrhead is surely a **top priority** and should be listed thus.

Additional road/rail freight facilities:-

It is high time to be more specific about the strategic location of rail-heads:

They need more objective input, than just being developer-led & possibly short-term in life.

2.54: Ports are 'a key resource', yet where are the quayside Tourist Information offices & facilities?

2.58: Protection of land beyond immediate boundaries of air port: -

If this is further defined, please take great care not to fall into the current trap:- where there are PD rights for PIK: yet airport-related development outside: such as;- (from painful example):-airport parking, -are virtually proscribed.

(PIK wanting a monopoly);- and land lies idle.

I expect the average life of an airport related business is 25 years, so not all land needs to so exclusively safeguarded, throughout the plan period:-

- ie:- to allow 'necessary services'.

[Suggest you look at the amount of unused, possibly PIK /Ent. Ayrshire -sterilised land near Prestwick Airport.]

2.62: Key strategic route:-

Cairnryan to Kilmarnock should include improved link to A71 viz:- a Hurlford Bypass:  
See Schedule 1: Hurlford and Crookedholm have so much through-traffic already,-  
that this is required, if they are to be included in Ci, rather than Cii.

3.5: I trust no more 'Big Ideas' for Ardeer!

Let it return to nature and retain some as a scheduled ind. archaeological site.

3.6: I query whether public sector investment;- even 'flexible planning policies' will  
'sort the problem' in parts of the EA Coalfield Community area, while it is targetted for  
waste disposal:open-casting and windfarms.

In any case the RDA designation allows some flexibility.

Q12: It is the people who need to be regenerated!

Q13: Housing Need:

Firstly quantify outward migration; new household formation; number of vacant houses;  
those used for accommodation addresses for benefits -(significant numbers)

Have you quantified the contribution which windfall sites can/have made?

Recently in places like Stewarton, they have been substantially greater than allocated  
sites.

Lack of proper recognition of windfall sites, is largely down to lack of basic land  
availability survey by planners, -as local plan allocations are increasingly developer-led.

I suspect that Schedule 3 is too high.

Do you mean N,W &S of Kilmarnock: -ie;- not necessarily in Kilmarnock?

I would object to such specified concentration.

Q14: Perhaps some 'near central' brownfield sites in Kilmarnock should be considered  
for affordable housing?

Welcome reference to Self-build: cf: Housing Associations.

Private developers may be 'frightened off' from Ayrshire, if they have to provide a high  
percentage of affordable housing on private housing sites.

3.23: Are you assuming that a large-scale single user site will be located at,-  
or north of 'Rowallan'

This cannot be assumed;-as with...

..3.24: 'Larger scale proposals for Kilmarnock Town Centre'.

Why not specify the latter?

If this is for 'Top of the Town' proposed development, please do not '**Plan by Stealth**'!,  
as with EAC: Office development on a public car-park in Kilmarnock is NOT in the  
Adopted EAC LP and will be 'resisted'!

Q16: Yes: Suggest signs of distress in Ayr and Kilmarnock Town Centres will be  
lessened by better access and parking;- not necessarily new offices:- and strict control  
over out-of-Town-Centre developments.

Q17: 3.32: and Woodland Strategy Diagram:-

- I query sites for potential rail-heads,- for coal, timber, sewerage & other waste.  
How can timber resources be promoted?- Ask the experts: Wood Products' Trade  
Association; also Visit Scotland!

3.33: Reference to Key Strategic site in diagram above:-

- **Object to a site which is apparently Killoch being identified, without any discussion.**
- Query identification of strategic recreational opportunity in NE East Ayrshire, without any consultation/description etc.
- No discussion/justification for designated timber transportation area;
- You appear to have omitted Whitelee Forest; -being felled for the next 35 years.

3.34: Why would a windfarm regenerate a community?

Unlikely- even if the development was community led.

3.35: Why should Ayrshire try to achieve these targets at local level, when Scotland already exports 70% of power generated?

Capacity of landscape to absorb further windfarm development:-

- I welcome recognition that this now needs to be curtailed; -yet you appear to contradict yourselves in 3.36, and on the Diagram on page 30.

Re. Diagram:-Query the site shown for commercial windfarms in NE Ayrshire:

If it is in addition to the currently proposed Whitelee Windfarm, that is quite unacceptable, near the entrance to our beautiful county.

3.37: If SAC ignore windfarms in their current finalised plan, the AJSP may need to be more specific.

Re. Diagram: Object to bio-mass power plant search area, which appears to be Killoch, without some argument/justification.

Q18: I really can't see why renewable energy in any form should act as a driver for rural communities:

Recycling might, but renewables have high investment costs and usually low employment levels.

3.40:-Who identified the coal-field area as a preferred area for energy production and why? Coal may have to be extracted where it is found, but does not need to be used there.

Do not identify biomass until the technology for large scale usage is proven;-

( see pyrolysis fiasco in Arran )

Is you are trying to 'plan by stealth', re. energy from domestic/industrial waste , including sewerage sludge-cakes etc, then be honest and say so.

How does your search area for such a plant fit in with a possible 'greencoal/waste using plant mooted for the about to be redundant **Chapelcross**;- also in the your same Waste Plan Area?

Q20: You need to weigh up the costs/benefits and technical feasibility;- together with the concept of importing waste:-

ie: Negating the proximity principle, before such an identification in this Plan.

Did the small-scale brush burning power plant in Dumfries and Galloway fail?

Diagram on page 30, omits other tourist gateways, such as Fenwick Moor ; Dalmellington ( from Galloway Forest Park) Loudounhill,-Upper Irvine Valley.

Have you calculated the proportion of tourists who come by boat/ferry, train, plane?

Your potential World Heritage sites are somewhat ambitious; (3.49)

Q21: Perhaps you should start by identifying Natura 2000 sites, which at least have European significance and represent a much greater asset and tourist potential.( see 3.45)

I expect there will be yet another feasibility (desk-top) study to allow others to identify more tourism opps. in Ayrshire!

3.44: Surely the last sentence should read:- New legislation..... should ensure continued growth in employment serving rural recreation.

Strategic Policy 1:

To recap: Query Action 3,- in respect of the ICI Ardeer former ICI/Nobel site.

Query Action 13, unless more specific.

Object to Action 14.

Object to Action 16.

Query Action 20:

4.1: Reflect first 2 sentences in your Vision Statement.

4.11: Add open-casting to 'conflict'.

I really think you should have some reference to **power lines**, in relation to landscape etc.

4.13: But some areas, apart from the Arran NSA, clearly have a higher scenic value than others?

So Disagree with Q 23: Perhaps you should re-examine the landscape classification study and rank on that basis.

Diagram on page 37: You show urban edge landscape management, yet you identify 'strategic' industrial sites on the urban fringes...Moorfield to the SE of Kilmarnock and 'Rowallan Mk 2' to the NW.

Q24: We seem to have resurrection of the 'old chestnut', (providing employment for more feasibility study 'experts',- on the 'Greening of Towns'.

The approaches to all settlements need to be protected, but technically as they will be outside the settlement boundary, there should be sufficient protection.

The trick might be to ensure that developers form a firm definable boundary, possibly by planting.

Improvement of the approaches( and transport corridors) to towns by road, rail etc should be given high priority

4.23: You have omitted the unique and fast disappearing estuarine salt-marsh.

4.25: To 'Mine-water discharge, add discharge from open-cast 'quarries'.

4.29: You may need to revise your return storm/flood periods:

1: 100 is now realistic.

4.30: If you say -open-casting (and therefore the burning of fossil fuels, the encouragement of an damaging extractive industry) is likely to remain an important economic activity, you duck the issue of first making a judgement whether it is important to the local economy and whether the disbenefits outweigh any benefits. If the plan period is to 2025, this is beyond the current time span of any existing o/c sites.

It is time for a complete appraisal of existing/former sites: -

- Whether they are likely to be extended, on the 'foot in the door' principle:
- Whether the little restoration effected, is satisfactory in returning the land and landscape to its previous condition; or hopefully improving its biodiversity and landscape value and its utility.

Your 'Preferred Area for Open-Casting in East Ayrshire', did not coincide with that shown in the Subject Plan, which unsustainably, basically showed all known resources. Yet EAC's areas took priority over your designation. Why?

Q24: Mineral extraction is unsustainable, unless there is an ecological environmental gain and careful rationing of finite resources...even peat.

I welcome reference in 4.30 to protecting them, not just exploiting them, as there is a great move towards the need to recycle what we have already extracted and used,-  
- in terms of building stone, aggregates, etc.

I note with interest you have not mentioned identification of a 10 year land-bank for aggregates, sand & gravel etc. for Ayrshire.

There seems no need:-

If the market area for hauling coal can be the English Midlands:

If coal can be imported into Hunterston from Australia, South Africa and the USA etc:

If Redland/Lafarge thought it economic to consider mineral extraction from the Western Isles;- then the concept of a local market area for minerals is much greater than Ayrshire, or even West Central Scotland.

Strategic Policy 2: 11. What do you mean by 'protection' of mineral resources:

This might conflict with environmental protection/improvement.

I regret that I cannot spend more time on closer examination of this Consultative Draft, but look forward to the next stage of this planning process.

I do feel that you need to 'engage more' with local people, who, together with their environment are currently Ayrshire's greatest resource.

GM Roberts. 26/8/04