

THE SCOTTISH COAL COMPANY LIMITED

**REPRESENTATIONS TO 'GROWING AYRSHIRE': AYRSHIRE JOINT
STRUCTURE PLAN 2005-2025 CONSULTATION DRAFT (JUNE 2004)**

AUGUST 2004

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1. Introduction

1.1 The response below sets out Scottish Coal’s views on the Draft Ayrshire Joint Structure Plan 2025 (DAJSP) published for consultation in the summer of 2004. The comments are made within the following context:

- Scottish Coal’s diverse business interests in Ayrshire (in particular East Ayrshire) including opencast coaling, renewable energy, property and estates.
- Support, in principle, for a replacement Structure Plan that focuses on the growth potential of Ayrshire to make it an attractive place to live, work, visit and invest.

1.2 Scottish Coal’s comments will generally follow the format of the DAJSP and where appropriate, reflect matters from the ‘Questions’ highlighted in the text of the Structure Plan.

2. Structure Plan Context

2.1 It is agreed that there is a need for a replacement Structure Plan to address the issues raised in the ‘Context’ chapter. Whilst the main issues (understandably) tend to have an ‘urban’ focus, Scottish Coal would suggest that Ayrshire ‘rural’ areas have the potential to make a very significant contribution to Ayrshire’s renaissance. This should be more fully recognised within the overall context of the Structure Plan, in terms of an innovative agenda relating to agricultural, diversification, landscape renewal, “land” based employment and ‘new’ job opportunities; and to help focus public spending priorities in these areas.

3. Vision Statement

3.1 From Scottish Coal’s experience of working within Ayrshire it felt that the DAJSP Vision Statement is a reflection of what already exists, although there are clear disparities across the ‘county’, with the rural areas tending to be more disadvantaged. Accordingly, we would suggest the following changes to the Vision for your consideration.

“Ayrshire will continue to develop as a place..... a growing sustainable economy open to innovation and investment, a good quality.....enjoying the levels of opportunity for local and regionally based employment and prosperity.....”.

4. Future Challenges and Strategic Aims

4.1 In our view the ‘Future Challenges’ facing rural Ayrshire needs to recognise:

- a skilled labour force in the production and processing of bulk goods, that must be able to diversify into a new technologies and industries (e.g. forestry/biomass/renewable energy);
- the need to target public sector support to these areas, not just socially disadvantage areas, but also to expand education and training, and exploit new investment and employment potential; and,
- the opportunity to develop new skills at local level.

4.2 The Strategic Aims, therefore, should consider supporting aspects of ‘re-invention’ for areas traditionally locked in to the primary jobs sector. Scottish Coal feel this is particularly relevant or the rural coalfield areas and would suggest the following amendment to Strategic Aim ‘6’:

“ To promote and secure a diverse range of economic activities in Ayrshire’s rural areas, having regard to resource opportunities and environmental qualities.”

5. Spatial Development Strategy

5.1 Scottish Coal support the principles set out in the DAJSP Spatial Strategy, and the links between settlements, transportation infrastructure and potential development opportunities. However, Scottish Coal would suggest consideration is given to the opportunity for an ‘**Eastern Gateway**’ given its road connections to the M74 and beyond; the rail links to the national rail network, plus the development opportunities linked to renewable energy. These connections also directly relate to the ‘coalfield’ communities and opportunities for regeneration, enhancing the principles identified in the Ayrshire’s Economic Development Strategy.

5.2 Whilst recognising the advantages of Ayr/Kilmarnock/Irvine as the focus of development through **Core Investment Areas**, Scottish Coal feel there is greater scope in the DAJSP to promote internal linkages between the ‘core’ towns and the many settlements in the rest of Ayrshire. An example of which could be:

- The reuse of large rural brownfield sites as ‘strategic’ opportunities for new industries such as renewable energy production; this providing for CHP and cheaper electricity – a major investment consideration across the whole of Ayrshire.

5.3 Scottish Coal recognise the merits of providing the **Investment Corridors** and these should be the focus for infrastructure and investment linked where appropriate to environmental and quality design opportunities.

6. Sustainable Communities

6.1 Scottish Coal are concerned that the standard planning approach of a hierarchy of settlements tends to give preferential treatment to larger towns (in terms of resource allocated for example) at a cost to the rural communities. In Ayrshire’s case, the DAJSP recognises the regeneration of rural communities (in particular coalfield communities) as a clear priority (in accord with national objectives). However, in assessing the potential of the rural communities, it is felt that a much clearer signal for ‘change’ is required. Potential issues to be addressed could include;

- The need to significantly diversify agricultural practices (short rotation coppicing for example)
- The need to link rural economic development with new forms of bulk industries (e.g. bio fuels) which in turn can add value to the economic strategy for Ayrshire, through investment links between natural resources, bulk production, new technologies and new jobs.
- The need to provide (potentially) large scale rural development sites to accommodate rural cluster development, for example centred round timber/biofuels/wood processing/energy production.
- A major review of the forestry/timber industry to ensure future supplies of timber are being planned for planting now, having access to bulk transport opportunities and the potential for the full process of biomass energy production, starting with combi-fuel (a coal/timber mix).
- The opportunity to directly link the inter-related benefits of and biomass to each other; plus the wider environmental, and recreation/visitor attraction of Ayrshire as a ‘destination’ outlet for tourism based on renewable energy for example.
- The opportunities to provide clear guidance on low impact housing, including self build, in attractive and marketable rural locations.

6.2 Overall, it is suggested that the rural areas of Ayrshire have a critical role to play in a sustainable land use policy of the future; **and** becoming an innovative economic

driver for a new energy related technology and industry. This approach would benefit Ayrshire and beyond.

7. Improving Accessibility

- 7.1 Scottish Coal supports the ‘accessibility’ strategy contained in the DAJSP; where improving bulk freight movements would contribute to local and national objectives. The opportunity to improve links beyond the Ayrshire boundary must, however, be matched by local improvements within the ‘county’, especially to the outlying areas that can provide a basic economic resources such as timber, coal and agricultural.
- 7.2 This may require the Structure Plan to recognise a more ‘relaxed’ approach to road transport in rural areas as a principle means of transport supporting development opportunities.

8. Principles of the Spatial Development Strategy (SDS)

- 8.1 In light of the foregoing, it is suggested that the potential of the rural areas is more fully realised in SDS for Ayrshire. These areas have the potential to provide new and exciting economic development; social inclusion and regeneration benefits.

9. Investing in Communities

- 9.1 Scottish Coal generally support the strategic approach shown in the DAJSP, but in line with the above comments, feel that there are a number of opportunities that directly link the strategic investment (corridors) and regeneration priorities for rural east Ayrshire. At the centre of this approach would be the renewable energy/biomass opportunity noted in the DAJSP. This strategy could be complemented by:
- significant housing land release across the coalfield communities/investment corridor to meet both local needs and market demands; a suggest figure of 3500/4000 units over the 20 year period of the Structure Plan.
 - a public sector investment strategy relating to the reuse of large ‘coal’ related sites (e.g. willow coppicing; site preparation at rail heads, such at Killoch, for timber/biomass cluster development)
 - co-ordination between forestry/willow coppicing/biodiversity/agriculture to ensure environmental benefits and landscape renewal.
 - linked transport improvements (some off road) to enhance movement within the area

- promotion of ‘electronic connectivity’ to facilitate home working and low impact housing
- 9.2 It is anticipated that a number of direct and indirect spin offs would arise from an integrated approach; namely,
- diversity of rural employment, utilising bulk handling skills; to new technologies and jobs and added value to the whole of Ayrshire and beyond;
 - revitalising the rural economy and landscape, with potential to link to improved visitor usage;
 - bringing private and public investments together in a co-ordinated fashion; of regeneration for Ayrshire to wider economic development objectives.
- 9.3 With the above in mind, Scottish Coal fully supports the introduction of Biomass as a key feature of Ayrshire’s Renewable Energy Strategy over the next 20 years. Scottish Coal, however, are keen to see Biomass become a recognised economic driver and renewal catalyst for east Ayrshire and would seek this recognition through an Strategic Policy confirming the importance of ‘Biomass’ in Ayrshire’s Renewable Energy Strategy.

10. Mineral Resources

- 10.1 As it stands, the ‘Mineral’ Section of the DAJSP suggests that coal is a ‘specialised’ mineral resource, and the Policy response is likely to “*..protect specialised mineral resources and to manage the extraction of aggregates in a manner which avoids a reduction in biodiversity and minimise landscape and community impacts.*”
- 10.2 Scottish Coal would suggest that a there is a clear distinction between coal (and associated minerals) and general and specialised aggregates and this is distinguished in national planning policies. Coal reserves, therefore, require to be **safeguarded** as part of the Government’s Energy Policy. Accordingly, landscape and community impacts can (normally) be mitigated against where proposals have had regard to the approved search areas. In addition, the potential exists for restoration to bring forward increased and improved levels of biodiversity that may provide an overall net environmental benefit. Scottish Coal would request, therefore, that opencast coal extraction within the Structure Plan area is treated as a separate policy matter.

SB/SCCL
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