



# SCOTTISH EXECUTIVE

Development Department  
Planning Division

Victoria Quay  
Edinburgh EH6 6QQ

Mr. Ian Johnson  
Ayrshire Joint Structure Plan  
15 Links Road  
Prestwick  
KA9 1QG

Telephone: 0131-244 7533  
Fax: 0131-244 7555  
graeme.purves@scotland.gsi.gov.uk  
<http://www.scotland.gov.uk>

Your ref: 2/2/II/EN  
Our ref: ZPP/30/710/1

11<sup>th</sup> August 2004

Dear Ian

## **GROWING AYRSHIRE: AYRSHIRE JOINT STRUCTURE PLAN 2025: CONSULTATION DRAFT**

1. Thank you for giving the Scottish Executive the opportunity to comment on the Consultation Draft of the Ayrshire Joint Structure Plan. We have circulated the document to relevant divisions within the Scottish Executive and the comments which follow represent a corporate view.

### **General**

2. The strategy set out in the document accords well with the spatial priorities for Ayrshire identified in the National Planning Framework. We welcome the clear links with Ayrshire's economic development strategy and the emphasis which the Spatial Development Strategy places on core centres of Ayr, Kilmarnock and Irvine as economic drivers. We also welcome the positive approach to the development of innovative policies for rural housing and the identification of a biomass plant search area. However, we find the unconventional format confusing and the text of the document over-wordy and repetitious in places. We believe the final structure plan needs to be shorter and sharper. There is considerable scope for reducing the length of the Context chapter in particular. The key conclusions from monitoring the previous plan should be the main focus.

3. We welcome the positive references to the Community Planning context and the success of the Ayrshire Economic Forum in taking forward their economic development strategy in partnership with public and private sector stakeholders. The Ayrshire Context section might also make reference to the role played by Local Housing Strategies.

### **Spatial Development Strategy**

4. We understand the desire to address the demographic challenges facing Ayrshire, but might have expected some spatial analysis of where the most acute problems are. We are not persuaded that the ideas and proposals put forward in the consultation draft constitute a strong enough development strategy to reverse current population trends. The structure plan needs to focus more clearly on the opportunities associated with Ayrshire's geographical position and offer a more convincing inspirational vision consistent with the framework established by the National Planning Framework. Simply setting an aspirational population target won't be enough to achieve the desired



result. Also, the link between the vision statement and the strategy is not as clear as it could be. Although the importance of environment is acknowledged, the first three chapters make little reference to the importance of greenfield areas around towns. While the importance of these areas comes through more clearly in Chapter 4, the approach to greenfield areas around the core investment area needs to be clearly articulated as an integral part of the Spatial Development Strategy.

5. The Spatial Development Strategy looks too like an attempt not to upset anybody. The investment corridors are too numerous and insufficiently focused. Virtually every settlement in Ayrshire appears to be included in one. There is an obvious tension between the ostensible focus on the core centres and the large number of communities identified as offering significant development opportunities. The structure plan will need to provide a much clearer sense of priorities if resources are to be targeted effectively. Listing places and corridors will achieve little without a clear signal of what might realistically be achieved and how. We assume that the proposed Sustainability Appraisal (para. 2.3) will comply with the requirements of the *Environmental Assessment of Plans and Programmes (Scotland) Regulations 2004* which came into force in July. In considering potential economic opportunities, specific reference might be made to the Executive's Green Jobs Strategy.

6. It follows that priorities for improvements to infrastructure need to be much more focused and realistic. The recognition that the integration of land use and transport planning is fundamental to the successful delivery of the spatial development strategy is welcome. However, while a large number of transport initiatives and improvements are identified, the draft plan neither explains the mechanism for delivery of these schemes nor provides any indication of their priority or effectiveness. The capital costs of some of the transport proposals would be substantial and some of them are unlikely to be deliverable within the timeframe of the Plan. Careful consideration needs to be given to the capacity of the transport network to accommodate the envisaged level of development. More specifically, there is a need to flesh out the infrastructure implications of major developments at Hunterston, Ardeer and Glengarnock. Where the need for improvements is identified, the structure plan needs to focus on key priorities, distinguishing clearly between projects essential to the delivery of the development strategy and longer-term aspirations. Proposals for further improvements to the trunk road network will require to be fully justified and, where appropriate, supported by modelling. Given the concerns over the extent of water and drainage constraints in Ayrshire, we are surprised that more hasn't been made of that issue. It will be important to indicate the Committee's priorities for the removal of development constraints.

7. Question 3 and the bold text after para. 2.15 should refer to "principal aims" rather than "principle aims". The first sentence of para. 2.29 should refer to the "principal focal point".

8. Question 4 deals with the development of Gateway Locations. The shortcomings in the presentation and operation of Prestwick International Station and the need for trains with adequate luggage space are issues which might be addressed in this context.

9. The section on Supporting Rural Communities is too heavily focused on the primary sectors of agriculture and forestry which employ only a small proportion of people living in rural Ayrshire. The structure plan will need to be more forward-looking and innovative in its approach to rural areas. It should be supportive of rural diversification in general, not simply farm-based diversification (para. 2.42 and development principle 6(a)). Para. 2.43 might say something positive about home-working and running businesses from home.

10. Paragraph 30 of the draft SPP on *Planning for Rural Development* draws attention to the need to develop policies which reflect the diversity of rural areas and we think that more could be

done in this respect. We welcome the support for low impact housing which accords well with the guidance contained in NPPG 15: *Rural Development* (paragraphs 29 and 30) and SPP3: *Planning for Housing* (paragraph 53). SPP3 stresses that proposals for low impact development should be carefully assessed against specified sustainable development criteria and the wider policy objectives of the development plan. There may be scope for identifying opportunities for second homes (see SPP3, paragraph 51) or the sorts of small-scale groups and clusters described in the draft SPP on *Planning for Rural Development* (paragraph 18). Para. 2.36 of the Consultation Draft indicates that some communities can only accommodate limited further expansion because of constraints related to their historic importance or landscape setting. The structure plan should also acknowledge that these very attributes may offer opportunities for sensitive tourism or leisure-based economic development.

11. The section on Improving Accessibility identifies 10 settlements where it is considered that by-passes are required to alleviate traffic problems (para. 2.50 and strategic principle 7). Strategic principle 12 indicates that strategic road improvements will be promoted to give improved access to the M74, Glasgow Airport via the A737, and Hunterston and Cairnryan. While the Executive has committed significant funding to a total of seven local improvement schemes on the A77, programmed for completion by the end of 2006, the Executive has given no commitment to any of these schemes and the structure plan must make this clear. The Executive reserves its position on the proposals until such time as further details are available regarding justification, programming, sources of funding and delivery mechanism to permit an informed decision to be taken.

12. We are generally content with the proposals for rail investment contained in the draft plan and welcome the links made between rail investment and economic development. However, the structure plan should clearly identify priorities, which might include the Glasgow-Paisley enhancements required to support Prestwick and Glasgow Airport services, improvements at Prestwick International Station, provision for a half-hourly service between Glasgow and Kilmarnock, platform lengthening and some freight capacity improvements. Ayrshire lines are heavily used by freight, and development at Hunterston may require enhancement of the route from Glasgow and rearrangement of the single-line approach from Ardrossan. In relation to port investment, the structure plan should acknowledge the importance of links to England's East Coast ports as well as Rosyth. The section on Improving Accessibility might also make reference to communications technologies.

## Investing in Communities

13. We welcome the reference to the role of Community Planning in area regeneration (para. 3.4). However, overall, the sections on regeneration and housing in Chapter 3 come across as rather hesitant. The text is also imprecise and difficult to follow in places. Although it is clear that the plan looks forward to 2025, it would be helpful for the start-date to be identified (and incorporated into Table 2). As it stands the table conveys little, because we are not told when the growth is being measured from. It may be more appropriate for the second sentence in para. 3.18 to refer to projected *household* rather than population levels. The housing land allocation proposals accord well with the messages coming from the Barker review. However, with North, West and South Kilmarnock all identified for further housing development, the spatial priorities below 3-town level could be clearer. Consideration will also need to be given to the implications of demographic objectives for education provision.

14. More should be said about the nature of the opportunities offered by Ardeer and Glengarnock and how they can contribute to the realisation of the overall development strategy (para. 3.5). The proposal for a single-user site at Ardeer (Strategic Policy 1) is not a national requirement and is not reflected in paragraph 3.5.

15. The proposed flexible planning regime to support investment in coalfield communities is welcome, but the structure plan should seek to develop a viable strategy for the future of these communities rather than simply calling for public sector investment (para. 3.6). Links should be made with environmental improvement, the diversification of the rural economy, improved countryside access, the Ayrshire and Arran Woodland Strategy and opportunities to develop renewable energy resources.

16. The section on Investing in Housing should explain how the structure plan relates to Ayrshire's Local Housing Strategies (see paragraph 72 of SPP3). There is little recognition of potential infrastructure constraints and environmental considerations are understated.

17. The identification of affordable housing as an issue is welcome. We hope that the structure plan will say rather more about what we can expect to see in Ayrshire local plans. At paragraph 3.20 it is noted that private housebuilders may be able to make a contribution to affordable housing where property values are high and we are aware that there is a particular issue in South Ayrshire. However, the same requirement may not exist where property values are low or where there is already a surplus of social housing. We are not persuaded that there is a need to include an affordable housing element in all significant land releases. The requirement for affordable housing should be informed by a housing needs assessment (see paragraph 77 of SPP3). It may, however, be appropriate to indicate that major housing releases should provide a diversity of house types and sizes.

18. The reference to the sequential approach to new development in Strategic Policy 1 appears to go beyond national policy. The meaning and justification for this policy need to be set out much more clearly. How will it sit alongside the requirement for sites for 20,000 houses? Might there be a conflict between exclusive reliance on brownfield sites and the desire to improve housing choice? The absence of any reference to the presence or role of out-of-centre retail developments would appear to be a significant gap.

19. We are generally content with the section on Renewable Energy and welcome the identification of a search area for a biomass power plant. However, the final sentence of para. 3.35 appears to misconstrue the Executive's renewable energy targets which apply at national rather than planning authority level. The structure plan should reflect the need to take account of impacts on historic environment resources (para. 3.36). There are a number of scheduled monuments within the preferred areas for large-scale windfarm development and cross-border issues will require to be taken into account to ensure that the strategy does not put undue strain on upland landscapes. The Joint Committee may also wish to consider whether there is any need to provide guidance on technologies other than wind power and biomass to reflect the national interest in promoting a mix of renewable energy technologies. Given the good work which has been done on the Ayrshire and Arran Woodland Strategy, one might have expected the draft structure plan to offer rather more on how timber resources and the timber industry might be promoted (Question 17).

20. Para. 3.42 provides good coverage of the opportunities offered by tourism. It might also be worth making reference to the potential for green and nature-based tourism and, given the numbers of Americans who come to Ayrshire to play golf, reference might be made to the opportunities for heritage-based tourism offered by Ayr's early links with the Americas. Part 17 of Strategic Policy 1 would read more positively if it were reworded along the following lines:

“Encourages new tourism investment particularly where it supports and strengthens existing urban centres, coastal and resort towns or rural diversification and contributes positively to environmental quality.”

The criteria which apply to the nomination of sites under the UNESCO World Heritage Convention are set out in the UNESCO *Operational Guidelines for the Implementation of the World Heritage Convention*. The key consideration is that such sites, whether cultural or natural, must demonstrate outstanding universal value and must satisfy the selection criteria, including for cultural sites, the test of authenticity. Such sites must initially be included on the State Party's tentative list. As World Heritage issues, including site nominations, fall into the class of international policy, they are not a devolved matter. The lead department is the Department of Culture Media and Sport and the first hurdle for any Scottish nomination is to get accepted onto the UK tentative list. Whilst World Heritage status may well produce the tourism and marketing spin-offs indicated, these are not amongst the key factors for nomination. If the councils wish to pursue designation in respect of Ayrshire's Burns heritage (para. 3.49), we suggest that they consider their proposal against the requirements of the UNESCO *Operational Guidelines*, and produce a fully worked up and justified case. ICOMOS UK who are advisers to UNESCO on World heritage matters may be able to offer further advice or assistance. Both UNESCO and ICOMOS have helpful websites.

## Protecting the Environment

21. Despite the strategic aim of safeguarding and enhancing the environment, the environmental policy framework is weakly developed. Chapter 4 requires significant restructuring, with landscape and natural heritage issues more clearly separated. SACs, SPAs and ICZM are covered under landscape when they would be better placed under a new heading of "Safeguarding the Natural Heritage", or the later section on Management of Habitats. In addition, para. 4.9 tends to imply that landscape is an entirely natural phenomenon. This is potentially misleading given that the imprint of past human activity makes an important contribution to its quality and character. We question whether it is true that the remoter parts of the area are dependent on agriculture (para. 4.4).

22. We support the position on landscape designations taken in para. 4.13 and are pleased to see the draft picking up on the National Planning Framework in terms of the economic and social value of natural heritage and landscape (paras. 4.6 and 4.9). However, there could be greater emphasis on the opportunity which development offers to improve landscape and environmental quality. Biodiversity is well covered but more could be said about the coast. Raising the issue of Integrated Coastal Zone Management (Question 22) may be premature. The plan should take the guidance set out in NPPG 13 as its starting point. Strategic Policy 2 needs to provide a more sharply focused policy framework for national and international natural heritage designations which accords with the terms of European Directives.

23. We note that the section on Safeguarding the Character and Setting of Communities makes no reference to the coalescence of settlements in setting out the purposes of the landscape protection criteria (para. 4.15).

24. The inclusion of a section promoting design awareness is welcome. However, the section would read better if the order of paras. 4.18 and 4.19 were reversed. The existing para. 4.19 should be amended to read:

"Good design practice can be delivered through the preparation of master plans and design guides and statements and this should be encouraged for all major developments as well as some minor developments, especially those in conservation areas."

It is not clear what principles are being referred to in the unnumbered paragraph after para 4.19.

25. The Joint Committee may wish to consider whether their application of the flooding risk framework takes account of the considerations set out in paragraph 37 of SPP7: *Planning and*

*Flooding* and the fact that the SPP sets out different policies for built-up areas and undeveloped areas. The structure plan will need to take account of the matters identified in paragraph 39 of SPP7, identify areas where local plans need to give attention to flood risk from other sources, and the wider role of structure plans in flood management described in paragraph 41 of the SPP. The final sentence of para. 4.29 should refer to River Basin Management Plans rather than the Water Framework Directive.

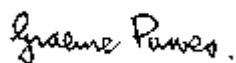
26. The targets set by the National Waste Plan necessitate substantial investment in the development of a network of facilities for recycling, composting and deriving energy from waste. The structure plan should draw on the National Waste Plan, the National Planning Framework, the guidance contained in NPPG 10, updated advice in PAN 63 and the Ayrshire, Dumfries and Galloway Area Waste Plan to provide a clear strategic framework for waste management.

27. In relation to minerals, the Joint Committee should be aware of the reviews of NPPG 4: *Land for Mineral Working* and NPPG 16: *Opencast Coal and Related Minerals*. Environmental justice considerations will be relevant in considering the impact of minerals developments on communities.

28. Consideration should be given to the implications of COMAH Regulations in terms of separation distances for the COMAH sites in Ayrshire.

29. I hope the above comments are helpful and look forward to the submission of the final Plan. I would, of course, be happy to meet you to clarify and discuss any points in this letter if you would find that helpful.

Yours sincerely



Graeme Purves  
Principal Planner