

Ian

Please find attached Homes for Scotland's comments on the Issues document for the Structure Plan review.

My apologies for this arriving so late in the day, but I don't think there will be any surprises in it.

Regards

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AYRSHIRE STRUCTURE PLAN ISSUES

THE ECONOMY

Homes for Scotland would agree that the Councils and economic agencies in Ayrshire should take a pro-active stance on economic development. The relatively-poor economic performance of Ayrshire has been documented over a number of years now, yet the area has many advantages as a place to live and has a number of economic assets on which to build. In that respect, the aspirations of the Economic Strategy and of the Councils through their corporate and Community Plans are supported.

The locations where growth is likely to be sustainable are well-enough known, principally around Prestwick Airport and in the main towns. Other drivers for growth are likely to include:

- Hunterston
- Transport linkages to the Central Belt
- Linkages to ports and airports
- Telecommunications infrastructure
- Tourism

The Plan should identify the transport corridors and transport infrastructure which offer potential either to attract employment to Ayrshire or facilitate residents of Ayrshire to work and conduct business in other areas.

COMMUNITIES

There is no doubt that the main towns will continue to maintain their functions as service and employment centres, and that growth should be focussed on these. Enhanced communications and transport is likely to make a number of areas more attractive to both existing Ayrshire residents and to incomers, for instance along the M77 corridor. Enhanced capacity on the rail links from Ayr, Kilmarnock and North Ayrshire could also generate further demand for housing well-located in relation to economic opportunity. Additionally, the attractive rural character of many parts of Ayrshire will always generate demand for housing in smaller communities.

On the other hand, there are many parts of Ayrshire without these potential advantages to attract growth, and it may be that a process of managed decline has to be accepted in areas which have lost their economic rationale. Certainly if a proactive economic strategy is to be pursued, that implies concentrating resources on areas with growth potential rather than on widespread regeneration efforts. It is in those areas with potential that private investment is most likely to be attracted. Private investment will be needed to realise growth ambitions, especially if development constraints such as drainage have to be overcome.

HOUSING

Homes for Scotland agrees that there is an emerging shortfall of land in overall terms, more so in marketable locations. In part that is due to current Plan policies which seek to protect areas with market demand for other planning policy reasons, in part due to a tendency, common in Local Plans throughout Scotland, to take insufficient account of planning delays and other factors affecting site effectiveness when allocating land.

The implication of planning for some degree of growth, it is understood, is that a higher completion rate for housebuilding would be needed than has been achieved in recent times. The industry has no doubt that this could be achieved, but that depends on the development plan as a whole identifying clearly locations for development, allocating sufficient sites to maintain a continuous minimum 5-year land supply, and seeking to identify both constraints and investment requirements early in the planning process.

In so doing, Councils may have to accept that there will be trade-offs between conflicting objectives, and that growth requires some development in locations where environmental policies may have to be of secondary consideration. The challenge for the development plan is then to set out a process of site identification and masterplanning which seeks to minimise impacts and maximise benefits, including private investment.

As discussed above, it may be a legitimate objective to continue to provide housing for residents of Ayrshire, existing and potential, who wish to take advantage of accessibility to employment and business opportunities elsewhere. That would have implications for the northern parts of North and East Ayrshire in particular, and perhaps also areas along the Ayr-Glasgow rail corridor.

SPP3 has given a stronger lead from the Scottish Executive to Structure Plans to identify long-term land requirements and allocations, with firm guidance for 12 years and indicative guidance beyond. That implies that the Structure Plan should set out a clear settlement strategy which looks well beyond the limits of a 5-year land supply and gives guidance to both the development industry and Local Plans on the future directions of growth. Long-term certainty is clearly what is required to help resolve the problems of investment in enabling infrastructure, and in that respect Local Plans should be guided to identify land allocations well in excess of a minimum 5-year land supply in order to give certainty, allow for strategic investment in infrastructure and create the flexibility for the market to respond to changes in needs and demands.

INFRASTRUCTURE

Homes for Scotland would agree that the Structure Plan, in concert with other strategy documents, should identify key infrastructure requirements and press for their funding. It is not appropriate to assume that the private sector can or should fund all necessary infrastructure, not least because the principles set

out in Circular 12/1996 restrict the use of “planning gain” to the mitigation of the direct impacts of development.

On the other hand, the issue of strategic infrastructure to open up large-scale development potential must be considered. Private investment to overcome capacity constraints, such as drainage, is more likely to be forthcoming if there is early identification in the Plan of growth locations and the investment needed to overcome constraints. Scottish Water has made it clear that it is looking for developers to work together on strategic infrastructure investment, and there are examples elsewhere, such as the opening up of expansion areas around Inverness, to show that the development industry can deliver investment on the basis of planned growth.

The key issues for the Structure Plan will include:

- Identification of a long-term settlement strategy and the infrastructure demands that will generate
- Incorporation of information from Scottish Water’s Q & S 3 exercise on the main strategic constraints and available capacities
- Identification of key transport infrastructure for accessibility to and from Prestwick, Glasgow, Hunterston, Stranraer and the Central Belt

RURAL AYRSHIRE

There is no doubt that parts of rural Ayrshire are attractive for general housing, as well as tourism and retirement housing. In common with most Plans, the Local Plans take a generally-restrictive approach to rural housing other than for operational requirements. However, the Scottish Executive feel that this is an overly-restrictive interpretation of NPPG 15, and the Consultative Draft SPP15 makes more explicit that there can be social and economic reasons for encouraging rural housing of an appropriate scale. These reasons can include promoting economic growth, protecting rural facilities and stabilising communities as well as reusing redundant sites and buildings. In addition, the amount of land in productive agricultural use is declining, and there is a growing issue of future land management.

In that context, Homes for Scotland supports a more permissive policy approach to rural housing where economic, social or land management benefits can be secured.