

## **AYRSHIRE JOINT STRUCTURE PLAN**

### **Comments on National Planning Framework for Scotland 2**

#### PURPOSE OF REPORT

1. To advise on issues for Ayrshire surrounding the publications of the discussion draft National Planning Framework for Scotland 2 (NPF2).

#### BACKGROUND

2. The first NPF (NPF1), published in April 2004, was welcomed by local authorities, business communities and the planning profession as a step forward in spatial planning within Scotland. With the passing of the Planning etc (Scotland) Act 2006, which amended the Planning (Scotland) Act 1997, the National Planning Framework now has a statutory basis to which it must conform. The Act also places a duty to ensure the document contributes toward sustainable development, is tested through parliamentary scrutiny and is monitored and reviewed every 5 years. Through a vision and strategy statement it seeks support for a direction of travel and spatial strategy which others can share and contribute in the period to 2030.
3. A key element of the new plan is the identification of a small number of national developments to be approved by the Scottish Parliament. Designation as part of NPF2 is a mechanism for establishing need for these developments in the national interest. The Government has indicated these will include major transport, energy and environmental infrastructure projects. Designation effectively removes the ability to question the “need” for the development through any subsequent planning process. By implication it also identifies priority for future Scottish Government funding, and is thus a significant pointer to where future resources will be directed.

#### KEY MESSAGES

4. The key messages delivered by the Government through NPF2 are that:
  - It wants Scotland to be the best place in Europe in which to do business. Central to this achievement is ensuring Scotland is economically, physically, digitally and intellectually connected to the rest of the world.
  - It wants to promote a greener Scotland through the close integration of economic development with the sustainable management of environmental resources.
  - It is committed in giving a stronger focus to Scotland’s communities through good local governance, empowerment and decision making, building on local initiative, and local tradition which it sees as essential elements of successful place making.
  - It wants to reduce Scotland’s carbon footprint and mitigate the impacts of climate change through the adaptation of the built environment.

- It is committed to reducing regional disparities and ensuring growth benefits the whole of society. The Government also recognize that a more even spread of economic activity will relieve pressure in high growth areas and will provide opportunities in areas such as Ayrshire.
  - It recognizes the economic value placed on Scotland's landscapes by tourism and recreation uses and the need to ensure high quality landscapes are passed on to future generations whilst degraded landscapes are allowed to evolve and change through positive management and regeneration programmes.
  - It is committed to the integrated management of coastal resources.
  - It seeks to encourage an increase in the supply of housing to around 35,000 homes per annum through high quality strategic planning.
5. Central to the delivery of the strategy is an action programme to include;
- a suite of nine national developments,
  - taking forward the concept of a sub-sea super grid to support renewable infrastructure,
  - the regeneration of the Clyde Gateway and supporting infrastructure for the Commonwealth Games,
  - investment in water & drainage infrastructure to support economic growth and regeneration,
  - the delivery and creation of new sustainable communities,
  - the development of a Central Belt Green Network and national habitat networks
  - the development of decentralized energy production, local heat networks and combined heat and power; and
  - infrastructure to support the National Waste Plan.
6. As well as setting out these key messages and improvements to national infrastructure the document also sets out context for the spatial strategy at a regional level. One of these "regional" perspectives covers Ayrshire and the South West. Appendix 1 of this report sets out various points from the draft NPF2 which are specific to Ayrshire.

## NPF 2: THE OVERALL DOCUMENT

7. In its current format the document is difficult to understand how the various elements come together. The strategy to 2030 and the proposed national developments are spread over a large number of paragraphs and several maps showing different components of the strategy. Whilst many of these components of the strategy can be supported this lack of coherence and direction means that some of the key messages are lost in the overall text.

In preparing the Ayrshire Joint Structure Plan whilst technical analysis of the issue can be helpful at a consultation stage, at the final plan stage experience has shown that much of that detail can be confined to separate technical appendices. **It is suggested that the authors may want to investigate shortening the document by limiting the sections on analysis and tightening the paragraph sections on strategy and national developments. This applies particularly to the several maps that form the basis of strategy which should be on one map. This would give a clearer view of the Scottish Government's priorities.**

### IMPLICATIONS FOR AYRSHIRE

8. Despite draft NPF2 having been published after the approval of the Ayrshire Joint Structure Plan there are many similarities in the aims, key messages and the way issues have been addressed by the Ayrshire authorities. This is important, as it illustrates continuity between NPF1 and the Ayrshire Development Framework. There are, however, a number of areas where this linkage has been broken in draft NPF2, which if not rectified could threaten the delivery of the spatial strategy for Ayrshire. These issues, taken together with the perceived lack of strategic profile Ayrshire now has in NPF2, the lack of national status attributed to Prestwick Airport & Hunterston and the impact of energy policy raise concerns over NPF2 and warrant detailed comment.

### Ayrshire Profile in NPF2

9. The document through the use of maps and diagrams presents a dramatic picture of the growing divide within Scotland, with significant concentrations of deprivation in west central Scotland and Ayrshire and with population and household growth significantly below the national average contrasting with parts of the Lothians and the East Coast. In these areas population is growing rapidly and infrastructure is constrained. With an emphasis in the strategy toward east Central Scotland and the North East, it seems clear that strategy is targeted toward the “growth” agenda of the East at the expense of a more balanced and sustainable approach to the spatial development across Scotland as a whole. This is shown dramatically in the Annex statements of national need for national developments and Strategy MAP 19 which identifies “strategic development plan priorities” around east coast cities and a key economic corridor along the East coast of Scotland, between Aberdeen, Dundee, Edinburgh and Newcastle with a link to Glasgow.
10. It is noted that this corridor does not extend south along the M77 and as a consequence, despite its acknowledged current poor economic performance but with acknowledged future potential, Central Ayrshire is now the only large urban agglomeration, (it has a population larger than Dundee & Aberdeen), which is not connected to this Key Economic Development Corridor. Whilst the need to integrate Ayrshire more fully into the Glasgow City region and to enhance transport links is recognised at various points in the text of NPF2 this is not carried through into the strategy which appears to be assigning Ayrshire a more peripheral role than in reality it has. **The delineation of Ayrshire outwith the Central Belt and beyond the Key Economic Development Corridor linking the Central Belt and the East Coast Corridor places the area at relative disadvantage, as a consequence Ayrshire lacks any significant future role in the NPF2 strategy (see MAP 19).**

### Central Ayrshire Economic Development Zone

11. The recognition of the Central Ayrshire Economic Development Zone in NPF1 was welcomed by the Ayrshire authorities and subsequently included within the approved Structure Plan. The issues on which this designation was based have not changed, illustrated by the analysis in NPF2, with the same emphasis towards regeneration, economic development and environmental improvement. The Zone was reflective of co-ordinated action between infrastructure and development planning, illustrated by the priority afforded in Scottish Water's long term investment plan and the proactive approach taken in the Structure Plan toward landscape green networks proposals. The loss of this linkage and also the "improving environmental quality" designation confirmed in NPF1 suggests that the issues on which it was previously based may have been resolved, (which is clearly not the case) **or** there has been a shift in national priorities away from Ayrshire which clearly cannot be justified in light of the text contained within the NPF2.
12. Within the context of the national areas designated for co-ordinated action it is clear the draft NPF2 lacks continuity and consistency, as an example, contrast Ayrshire's Core Area - Kilmarnock, Irvine Bay and Ayr- which has a population of 210,000 with Inverness/Nairn, with a population of 76,000. If the intent of these areas is in part to promote integrated action and to facilitate a response to increasing housing supply (refer paragraph 171) it must be recognised that supporting national infrastructure improvements, water and sewerage/rail connections in areas of regeneration are equally important, more cost effective and likely to lead to more balanced spatial development of Scotland, a key message which NPF2 states it wants to deliver. **The Draft NPF2 fails to address the scale and complexity of the regeneration and the environmental improvement task faced by the Ayrshire authorities and partner agencies recognized by NPF1 and wishes the Scottish Government to consider how priorities established but not yet achieved from NPF1 can be included in NPF2.**

### National Developments- Prestwick Airport & Hunterston

13. Legislation allows for the designation of national developments in the NPF. If included they are required to include a statement of need. The criteria for the selection of national developments were set in September 2007 by the Cabinet Secretary for Finance and Sustainable Growth. To qualify as a national development 6 criteria must be met, these are;
- To make a significant contribution to sustainable economic development
  - Strengthen Scotland's links to the rest of the world;
  - Deliver strategic improvements in internal connectivity;
  - Make a significant contribution to the achievement of climate change, renewable energy or waste management targets;
  - Essential elements of a programme of investment in national infrastructure; or

- Raise strategic issues of more than regional importance.
14. Within this context only one subset of one of the nine designated national developments lies within Ayrshire, i.e. “grid reinforcements to support renewable energy developments”. This suggests that no other project meets the criteria set by Ministers for projects considered to be essential to the delivery of the spatial strategy set out in the NPF. Yet any project contained within this small group of infrastructure initiatives will almost certainly receive additional prioritised resources, and it is considered that two further projects are worthy of inclusion in the list of national developments.
  15. In NPF2 **Prestwick Airport (GPA)** is recognised as an international gateway to Scotland as is the need to build on the airport’s success to drive the Ayrshire economy. Whilst GPA’s role and potential in passenger, freight, MRO and air traffic control is also recognised and welcomed, and the need to make surface access improvements is acknowledged, the action promoted the NPF2 falls significantly short of GPA’s and national aspirations for growth at the airport.
  16. The Airport Master Plan which is being prepared has, in line with sustainable principles, based it’s assumptions on significantly increased air passenger rail patronage around current levels of 30%. This means an increase from around 530,000 passengers currently using rail to 1.7m by 2018 and 3.3m by 2033. (GPA Forecasts) and while NPF2 does acknowledge the need for increased services between GPA and Glasgow City Centre over the next 25 years it is not clear when and how quickly this additional capacity can be delivered. There is also no commitment to deliver direct access from the north and east of Glasgow via Crossrail, a scheme that has recently been assessed and shown to be financially viable when the “components of growth” within Ayrshire are taken into account.
  17. In addition if the aim of NPF2 is to” build on the success” of Prestwick Airport (Para. 282) this can only be achieved through the sensitive positioning of national infrastructure such as power lines and associated renewable energy projects that, as currently advocated in NPF2, threaten the safety of the airspace on which this growth is founded (see also further comments below). **Prestwick Airport expansion should be recognised in the same way as Glasgow and Edinburgh Airport expansions as a national development, not only to recognize the significance of the airport itself but also in order to prioritise the infrastructure needed to sustain the growth of the Airport.**
  18. **Hunterston** is not recognised as an “International Gateway” nor a national development opportunity although there is support and recognition in the draft NPF2 for the role of the port as a deep water opportunity. The lack of designation as a national development may have negative knock on effect on priorities and related investment particularly in transport and access improvements. This lack of national recognition is in contrast with the port at Scapa Flow. **Hunterston and the associated infrastructure to facilitate long term growth should be included as a national development.**

#### Other National Development Opportunities

19. Map 20 illustrates the designated National Developments; these include the nine associated with statements of need outlined in the Annex of NPF2, natural heritage designations, world heritage sites and national parks. This diagram should perhaps take a

more visionary approach consistent with the 2030 timescale of the plan to include future potential opportunities that may have national or international status. Examples could include existing and future UNESCO designations referred to in para. 19 of the introductory text and longer term aspirations for the rail network e.g. electrification. In Ayrshire work in conjunction with Dumfries & Galloway is advanced in preparing a case for a Biosphere in the Merrick/Galloway Hills and a further opportunity for a Geopark exists on Arran. There is also an opportunity to confirm the international status of the Regional Parks in Scotland through their inclusion as a national designation on Map20. Linking Kilmarnock to the electrified network would provide further economic opportunity to this area as well as long term environmental benefits. **NPF2 needs to show a greater emphasis on the integration of nationally significant environmental opportunities and their opportunities for sustainable economic growth.**

### Renewable Energy and Grid Connections

20. The draft NPF2 fails within the context of a plan to 2030 to present an adequate spatial context for the growth of onshore renewable energy in Scotland, focussing largely on short term grid improvements funded through speculative renewable energy proposals. The proposals fall short of meeting recent targets and do not provide an adequate context for the long term. This is illustrated within the context of Ayrshire's only National Development (see Map 20), that is a line linking Coylton with the proposed concentration of wind applications around Kyle Forest in East Ayrshire.
21. In the statement of need draft NPF2 states that the grid reinforcement is to facilitate the development of renewable energy resources and to maintain long-term security of energy supply. Yet most of the wind farms as yet do not have consent or are at appeal and have serious implications for the long term development of Glasgow Prestwick Airport. Similarly the line as yet does not have consent. It is understood from previous OFGEM statements that if these wind farms do not gain consent or do not proceed the new line will neither be needed nor financed.
22. Basing infrastructure on speculative proposals is not the best way to plan the future national need. If new transmission capacity is required in Ayrshire it should serve the potential being offered within the two search areas identified in the recently approved Structure Plan by reinforcing/upgrading the existing Coylton to Auchencroish line. An upgrade of this line could also support the opportunity for a co-fired power plant utilising biomass/clean coal generating capacity within the vicinity of this line as well as supporting the wider potential offered by the wind farm search area capacity within the Glasgow & Clyde Valley area.
23. If however the proposed new South West Scotland transmission line is part of a more extensive upgrade as has previously been suggested, in that it is the first stage in longer term aspirations for a much larger scheme connecting generating capacity in Cowal/Kintyre (and/or beyond) via a subsea cable to Hunterston then to Coylton, and from Coylton over the currently proposed new line to Kyle and from there over a new line south to Harker by Carlisle, then this should be clearly articulated in NPF2. In this context the justification for the new line would need to be considered in a much wider strategic context. **The current statement of need for a new South West Scotland line as a national development in NPF2 is premature until the various wind farm developments in the area have received consent. An upgrade of the Coylton/**

**Auchencroish line would be supportive of the recently approved Ayrshire Joint Structure Plan and should be recognized as beneficial to the release of long term renewable capacity in the area. NPF2 needs clarity on the long term needs for transmission lines throughout SW Scotland to give clarity to future development.**

#### Small Towns and Sustainable Communities

24. There is welcome recognition of the contribution small towns play in the identity of Scotland, Para 163, and there is support for the commitment given to them by the NPF. In contrast with the national picture almost half the population of Ayrshire lives in “small towns” and their economies are recognized as an important component of the regional economy. The approach advocated in NPF2 has been explored by East Ayrshire Council in parts of the former Cumnock area. Through place-making, environmental improvement and flexibility in land allocations opportunity for economic diversification has been highlighted and realized.
25. The Ayrshire authorities have through the recently approved Structure Plan sought to bring forward opportunities for future sustainable communities. These locations are well connected to the public transport network, can be integrated into future development opportunities, avoid areas of flood risk, noise and significant cultural and heritage designations. A number are on brownfield land and have the potential to take a lead in terms design quality and compatibility with the local landscape character. Examples are outlined in Schedule 5 of the Structure Plan and include opportunities in Cumnock, Mauchline, Glengarnock & South East Ayr. The Ayrshire authorities would welcome further discussion on the possibility that these areas can one day become “the conservation areas of tomorrow”. **NPF2 needs to provide more support in the section on the action programme to the importance of small towns as well as to the development of sustainable communities (para. 299).**

#### CONCLUSION

26. The publication of this discussion draft as a contribution toward the future spatial planning of Scotland is welcomed. Much of the text is helpful recognizing and supportive of the development strategy advocated in the recently approved Structure Plan (refer to analysis in the attached Appendix). It is however clear that if NPF2 is to meet the requirements of statute, and a consensus built around the strategy, further consideration will need to be given to ensuring a better balance of growth across Scotland through the delivery of national infrastructure. In the context of Ayrshire, a more overt recognition of the significance of the potential this area has to offer to the growth of Scotland is required, and a recognition of Glasgow Prestwick Airport and Hunterston as national developments.

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**APPENDIX 1**  
**NATIONAL PLANNING FRAMEWORK**  
**KEY ELEMENTS OF INTEREST TO AYRSHIRE (in no specific order)**

**ANALYSIS**

1. There is a spatial perspective on Ayrshire & the South West.
2. Geoparks-There is no reference to future opportunities (Ayrshire/Dumfries & Galloway) & or the extension of other UNESCO designations, refer Ayrshire Structure Plan within Scotland (paragraph 19).
3. Recognition of the problems associated with diffuse agricultural pollution in the south West of Scotland, no linkage however in the Water & sewerage section later in the NPF.
4. Highlights the change in the distribution of population, from the West to the East.
5. Highlights that Ayrshire is failing to keep pace with the rest of Scotland in the creation of knowledge jobs.
6. Highlights that the growth in financial sector jobs is largely in Edinburgh but of growing importance in Glasgow, Perth & Aberdeen.
7. Highlights that cities are the key drivers of the economy and hubs of the wider regional economy.
8. Recognises the dormitory role small towns in parts of Ayrshire now play as the decline in traditional industries has been replaced by service industries.
9. House Price to income levels remains low relative to other parts of Scotland.
10. Hunterston recognised as an important port for imported coal.
11. Prestwick recognised as one of the five main airports in Scotland. Recognised for its role low cost-services and heavy freight.
12. Ayr recognised as an important transport hub/interchange.
13. The continuation of nuclear power generation from Hunterston B until 2016 is recognised.
14. Government wants confirmation of broad areas of search for renewable and the approach set out in SPP6 to be implemented through the preparation of supplementary guidance.
15. Ayrshire's role in meeting national coal requirements is recognised.

**DRIVERS OF CHANGE**

1. Economic Strategy: Government Economic Strategy (GES) published in November 2007 makes it clear financial and other resources will be aligned to ensure policy development and spending programmes are sharply focussed through the delivery of strategic objectives. (Wealthier & Fairer, Greener, Safer & Stronger, Smarter, Healthier). Within this context infrastructure development and place will be key priorities.
2. Importance of Place: Importance of place to a modern economy recognised in NPF1. Features include high quality environment & cultural identity.
3. Sustainable Development: Climate Change & Greenhouse Gas reduction, conserving natural resources, including wildlife and habitats, managing coastal change- are seen as key future issues.

4. People & resources: The trends for some parts of Scotland to grow and other parts to decline is highlighted, forecasts presented are for this to continue. Emphasis on meeting the needs of the growing areas through the provision of physical & social infrastructure (homes, affordable housing, schools etc).
5. Regeneration: Irvine Bay recognised as one of 5 urban regeneration companies.
6. Transport & Land Use: The importance of improved connectivity to unlock the potential of priority areas for regeneration such as the Clyde Corridor & Ayrshire is recognised. Growth in air transport and the need to reduce emissions however will be important drivers within transport policy. The importance of moving more timber by sea highlighted.
7. Renewable Energy: 2020 target for Scotland set at 8GW. Taking into account onshore built and consented operations, hydro and biomass, potential offshore opportunities this would require an additional 1.4GW of onshore capacity across Scotland (The Ayrshire Structure Plan has confirmed this capacity within the two identified search areas).
8. Waste Management: Aspiration toward zero waste and to reduce amount of waste land filled as far as is reasonably practicable. EU Landfill Directive requires amount of biodegradable municipal waste to be reduced to 35% of 1995 levels by 2020. Landfill tax will be set at £48 per tonne by 2010.

## SCOTLAND 2030

1. Key aims of the strategy to 2030 are:
  - To contribute to a wealthier and fairer Scotland by supporting sustainable economic growth and improved competitiveness and connectivity;
  - To promote a greener Scotland by contributing to the achievement of climate change and protecting and enhancing the quality of the natural and built environments;
  - To help build safer, stronger and healthier communities, promoting improved opportunities and a better quality of life; and
  - To contribute to a smarter Scotland by supporting the development of the knowledge economy.
2. A Growing Economy: Aim to create a knowledge driven economy capable of meeting the challenges of a highly competitive global environment, based on a skilled workforce, creativity and enterprise and the transfer of knowledge to the market place. Targets for GDP & population set (match average EU-15 population growth from 2007-2017, raise GDP to level of small independent countries by 2017).
3. A Greener Scotland: Short and long term targets for reduction in emissions. Make the most of Scotland's renewable energy potential, promoting sustainable patterns of development and travel, deal with effects of climate change. Recognition that economic development must be closely integrated with the promotion of environmental quality and the sustainable management of environmental resources.
4. Stronger, Healthier & Safer Communities: Aim is to promote sustainable approach to regeneration by creating the right environment for public and private investment.
5. Development Strategy: Key elements include:
  - To support strong, sustainable growth- spatial priorities identified (e.g. Inner Moray Firth, Clyde Corridor etc). Recognition that a more even spread of economic opportunity will relieve pressure in high growth areas and provide additional opportunities in areas such as Ayrshire. Good access to the opportunities of growth, such as the financial district on the Broomielaw, Glasgow is important;

- Reduce Scotland’s carbon footprint- development plans need to develop strategies for more sustainable patterns of development and to take account of climate change predictions;
- Support the cities as key drivers of the economy- Recognition that successful cities need to be supported by strong regions well connected to facilities. Recognition that the planning reforms and restructuring of enterprise agencies and Visit Scotland will facilitate strategic policy making at a city region level;
- Support sustainable growth in the rural economy;
- Conserve & enhance Scotland’s distinctive natural and cultural heritage. Seeks also to encourage the restoration of derelict land and increase the proportion of woodland, particularly around communities; Recognises the importance of Scotland’s Landscape & Marine and coastal Environment;
- Expand opportunities for communities and businesses by promoting environmental quality and good connectivity;
- Enable disadvantaged communities to benefit from growth and access opportunities;
- Strengthen links to the rest of the world;
- Promote sustainable patterns of travel and land use;
- Realise the potential of Scotland’s renewable energy and facilitate generation of power and heat from clean, low carbon sources;
- Encourage a sufficient supply of homes that are affordable in places people want to live; target of 35,000 per year set for 2015 - Response to housing provision requires working at a regional level p171. Emphasis on existing settlements building on existing infrastructure and Brownfield land (if available); and
- Facilitate the achievement of waste management targets.

## INFRASTRUCTURE

1. National Developments: Criteria for inclusion; Grid reinforcements to support renewable energy developments only relevant project in Ayrshire (no mention of Hunterston as a national development). Statements of need for national developments included in Appendix.
2. Transport: Glasgow/Ayrshire/Stranraer; identified as a national transport corridor. Importance of linking Prestwick Airport with high speed trains to other Scottish airports and main cities is highlighted. Hunterston recognised as sheltered deep water opportunity- recognition of Structure Plan position that Hunterston offers the potential to be an international transshipment hub. The Clyde identified as a “Global Shipping Route”. Prestwick & Hunterston identified as national “gateways” (Ports of Ayr, Troon & Ardrossan are excluded). Improvements and rail capacity to south & west of Glasgow and A77 are confirmed.
3. Energy: Inclusion of Ofgen approved routes; this includes a New South West Transmission Route. Map 20 identifies it as a national development. Statement of need unclear - information provided in SEA scoping assumes renewable energy consents in this area (only Windy Standard and Hare Hill approved). Planning authorities encouraged to facilitating more decentralised patterns of generation and supply.
4. Waste Management: Role in delivery of solutions to targets set by EU landfill Directive emphasised. Facility for radioactive waste sought in the South of Scotland in addition to Dounreay in the North.

5. Water & Drainage: Previous infrastructure priority of central Ayrshire not referred to (paragraph 241).

## **SPATIAL PERSPECTIVES**

Ayrshire included in a Section titled “Ayrshire and the South West”- key components are:

- Important gateway to Scotland.
- Need to strengthen links and transport corridors between Ireland.
- Build on the success of Prestwick Airport.
- Better transport integration with the Central Belt.
- Confirms the Core Area identified in the Structure Plan.
- Transport corridors linking Prestwick Airport, ports of Ayr, Troon & Hunterston to the Central Belt provide good locations for developing clusters of export orientated industries and a stronger service sector (I.e. recognition of Key Investment corridors in the SP).
- Recognition of housing led growth strategy.
- Recognition of the Dunlop/Stewarton extended rail loop and a half hour service to Kilmarnock.
- Recognises the URC- Irvine Bay & Master plan.
- Recognition of Arran & Coast as important tourist areas.
- Need to upgrade environmental quality in the former mining areas of East Ayrshire; area presents opportunities for renewable energy, including biomass production.
- Recognition of the Ayrshire & Arran Woodland Strategy.
- Confirms that there are opportunities for development of forest industry.
- New rail head at Barrhill proposed.

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