

SOUTH AYRSHIRE LOCAL DEVELOPMENT PLAN PROJECT BOARD

24th April 2018; 2:00pm – 4:00pm in Troon Committee Room, County Buildings

Agenda

- Consultation Issues (leaks and lessons learnt),
- LDP2: Comments on MIR and Initial Response.
- Next Stages (including housing calculation and further consultation)
- Development Plan Scheme Update (verbal update)

SOUTH AYRSHIRE COUNCIL

**PAPER TO LOCAL DEVELOPMENT PLAN PROJECT BOARD MEETING OF 24th APRIL
2018**

**SUBJECT: Local Development Plan 2 Main Issues Report Public Comment and
Comments and Initial Responses**

1. LDP2 Update: Main Issues Report Consultation Outcomes

1.1 At the LDP Board meeting of 11th August, 2017, Members were updated on the programme of work relating to the contents of the Main Issues Report (MIR) and the schedule for associated publicity and consultation arrangements. South Ayrshire Council approved the MIR documents for consultation on 5th October 2017. Consultation took place during an extended period from 20th November to 31st January 2018.

2. The Consultation Process.

2.1 Consultation took the form of an on-line storymap, with interactive questionnaire, and a series of drop in and discussion events held at Customer Contact Centres and larger halls/venues, both during the day and in the evening. Two dedicated (but poorly attended) focus group events were held for Community Council representatives, and for members of the Youth Forum. Hard copies of the MIR and supporting documentation were made available at public libraries, County Buildings and Burns House, and copies of the MIR were distributed to Community Councils on request. A 'PDF' version of the MIR document was also available to view and download from the Council Planning Service web site.

Hard copies of the equivalent on-line questionnaire were made available at the drop in events (approx. 30-40 of which were taken at each event), and a significant number of 'reference' copies of the MIR (some 10-20 per drop in event) were also taken by attending members of the public.

2.2 Publicity for the consultation took the form of statutory press notices, posters in Council drop in centres and libraries, notification on the Council's consultation web page, the Planning Service's dedicated web page and the Council's 'Facebook' and 'Twitter' posts. Criticism was made that the Council did not individually notify every household in South Ayrshire. Clearly, it was not feasible or proportionate to do so. However, some local Community groups however undertook leaflet drops to raise awareness of certain Issues and Councillor(s) also undertook leaflet/letter distribution to raise awareness of specific consultation events. Additional advertisements were carried in the 'going out' free paper in Troon at the request of local Councillor(s).

- 2.3 The commercial and free press carried articles / opinion on certain, more emotive issues, some in advance of the commencement of the formal consultation process, but in some cases this was misinformed/ inaccurate. This proved to be a double edge sword, by creating substantial public awareness of the consultation, but causing a great deal of public anger and distress. Future consultation strategies will need to be more carefully tailored, with earlier information to improve general understanding of the LDP process and various stages in its preparation.

Events

Attendance figures: Daytime events (approx.)

- Maybole (Carrick Centre) 5
- Girvan (Customer Contact Centre) 1
- Prestwick (Customer Contact Centre) 25
- Ayr (Customer Contact Centre) 25
- Troon (customer Contact Centre) 50

Attendance figures: Evening Events (approx.)

- Ayr Academy 25
- Troon Walker Hall (combined figure) 30
- Symington Community Hall 50
- Monkton Primary School 30
- Loans Village Hall 60

Feedback

There was some criticism of a focus on submitting responses via the on-line story map and questionnaire, although traditional methods of engagement were also available. It was hoped that the use of the interactive questionnaire would speed up and assist in the analysis of comments submitted, but. In response to this criticism, the on-line StoryMap and questionnaire were simplified in the early stages of the consultation process

There was considerable criticism of the limited capacity of the Troon and Ayr daytime Drop-In venues. In response, evening events in a larger venue were subsequently arranged for Troon, although these were relatively poorly attended. Ayr also had an evening event, attendance at which was also modest.

It is likely much of the public criticism of the consultation process itself was simply another means of attacking the more emotive suggestions in the MIR.

Positive feedback / thanks was received from Loans Community Council regarding the Loans evening event.

The specific community council event was not well attended, with only 4 community councils represented, but proved worthwhile nonetheless. The specific Youth Forum Event was poorly attended, and informal feedback suggests it was not well received.

3. Comments and Key issues

- 3.1 A total of 406 individuals made representation within the consultation period, covering the full range of issues contained in the MIR Report. As anticipated, the main points for discussion centred on the suggestions for residential development sites, the question posed about Dalmling Golf Course, and the spaceport. Petitions were also submitted on the issues of Dalmling and Muirhead/Loans (1235 and 367 signatures respectively).

Responses on Muirhead / Loans residential site suggestion	246
Responses on Loans residential site suggestion.	95
Responses on Symington residential site suggestions	34
Responses on Dalmling Golf Course suggestion	52
Responses on Monkton / Airport Masterplan	58

A précis of all comments is available in Appendix 3 of the 'MIR Consultation: Initial Response document'. Members should however also note that all comments will be available to view in full from w/c 30th April (delay due to on-going work to redact personal data).

There was considerable criticism, both within and outwith the Council, with regard to the inclusion of controversial elements within the Main Issues Report. These elements were, notably, the suggestion that we could consider the release of additional greenfield land to stimulate the housebuilding industry, the suggested allocation of specific residential development sites, particularly the Muirhead/Loans gap, the use of some public open space to build council houses, and the potential for alternative uses of Dalmling Golf Course.

Notwithstanding the criticism, and as discussed at the full Council meeting which approved the MIR for consultation, it was wholly appropriate to include the controversial items for discussion. Scottish Government guidance contained in Circular 6/2013, (paragraph 71) states ***'Consultation on the main Issues Report should come before the planning authority has reached a firm view as to the strategy. It is important at this stage that the authority be genuinely open, and willing to consider new or different ideas, and not resolved simply to defend their preferred proposals. Main Issues Reports have to be engaging documents that encourage the public and other stakeholders to read and respond to them'***

3.2 The headlines

Members of the public are deeply critical of allocating land for housing above that which is necessary, as defined in the Housing Needs and Demand Assessment (HNDA). Unsurprisingly, the criticism arises mostly (but not exclusively) from residents of locations/ communities where this may have the greatest impact.

The concept of 'placemaking' as a justification for the allocation of residential development sites is comprehensively dismissed by the public as a potential strategy option.

The Housebuilding industry is deeply critical of the calculations / assumptions of housing site effectiveness and the proposed use of the 2015 HNDA figures. 'Homes for Scotland' is of the opinion that it would be in the interests of the

local economy and aspirations of the Council, to allocate additional development sites in excess of the HNDA figures.

There is criticism of the suggestion that some public open space in Troon be used for the construction of Council houses, and that an open space audit should be undertaken before any decisions are taken.

The prospect of the Spaceport and airport resurgence is met with equal levels of optimism and disbelief, but the principles of developing and incorporating a masterplan approach are generally supported. Concern over the potential large-scale expansion of Monkton (particularly with respect to infrastructure and residential amenity) are frequently raised, regardless of opinion on the appropriateness/likelihood of the spaceport project.

There is strong (golfing) community criticism of the suggestion that Dalmilling be used for alternative forms of development and leisure, but recognition that the course offers some potential for improvement, better management, and some limited potential for increased use and perhaps marginal development.

There is clear support for closer working across Ayrshire, irrespective of opinion on the Ayrshire Growth Deal, particularly with regard to transport and infrastructure provision.

There were mixed responses to the suggestion that LDP2 should prioritise certain elements of the economy over others, but a very clear message that there should be strong commitment to a retention of, and greater emphasis on, the principles of environmental sustainability across all aspects of the Development Plan and that the principle of environmental sustainability should be clearly defined in the Plan's Vision, and overarching Strategy section.

Public concern with regard to Ayr town centre, and a desire to see a more pro-active role for the Council, as well as a desire to see the redevelopment of vacant land and buildings is much in evidence. Whilst this was frequently mentioned as a way to rebut the suggestion of new greenfield development allocations, the issues are evidently matters that the general public thinks that the Council has the capacity, and a duty to address as a matter of priority.

3.3 Tailored Response to issues and Comments

The MIR Initial Response document aims to pull together the range of comments on the main issues that were submitted during the consultation process, and present them in a fair and reasonable light. It does not seek to list all comments in full, nor answer specific or individual respondent questions. The purpose of the MIR consultation is to gain a better understanding of opinion and issues rather than to defend or rebut any notion of a fixed position or policy strategy. Responses to it should therefore be read as a continuation of a discussion thread for consideration and further assessment in the drafting of the proposed plan.

Documents provided as an outcome for the consultation comprise:

- MIR Consultation : Initial Response'
- Appendix 1: Issues 5B Suggested Sites Comments and Response.

- Appendix 2: Additional site suggestions and Initial response
- Appendix 3: Précis of Comments and representations.

A brief presentation will be given at the start of the Board Meeting to highlight the most significant elements of the consultation responses, but Members are asked to note the drafted full text and associated documents listed above.

4. The Next Stages in LDP2 preparation

- 4.1 It is the practice of the Planning Service to make papers to the Development Plan Board available for public view on the LDP pages of the Council's web page. This in turn, will form the main reference point for people who have made comment on the Main Issues Report. We will notify all of those people of its availability by means of e-mail or letter, depending on the method by which their comments were submitted to us. As is our standard practice however, only the lead contact for submitted petitions will be notified.
- 4.2 The next statutory stage in plan preparation is the drafting of the Proposed Plan. Whilst the MIR was a document intended to stimulate comment and discussion, the Proposed Plan comprises a document which the Council will seek to formally adopt as land use policy and associated strategy: it will represent the Council's settled position on these matters. Work to draft much of the text for the Proposed Plan stage of LDP2, and a review of associated Supplementary Guidance documents, can now commence, whilst further research and consideration of complex and / or controversial issues continues.
- 4.3 A review of the 2017 Housing Land Supply is arguably the most pressing issue. This is a critical element in understanding the future requirements for residential development land. Previous meetings with, and comments from the official representative body of the housebuilding industry, 'Homes For Scotland', have been critical of the approach taken by South Ayrshire's Planning Service, and whilst concessions and compromise are usual outcomes of the assessment of housing site effectiveness, the issue of housing numbers is likely to come under particular scrutiny as the work progresses towards the drafting of the Proposed Plan. A verbal position statement on the issue will be given to Members on the 24th, but it is considered that a specific meeting with the Board to discuss details at a later date would be beneficial.
- 4.4 Connected to the emerging residential development strategy, but also in association with the progression of the Prestwick Airport / Spaceport masterplan, considerable work is necessary to establish the requirements for infrastructure investment. Some (justifiable) criticism has been received (e.g. from Transport Scotland) with regard to a lack of detailed consultation to date but this has been a consequence of the uncertainty over whether there would be any new residential development site allocations, and the delayed receipt of the draft Airport masterplan.
- 4.5 Consultation with key Agencies, Council services and service providers will take place as/ when the residential strategy becomes clear, but consultation on matters concerning potential development at Monkton should continue in association with the Economic Development (Place Directorate) team.

- 4.6 Discussion with potential developers of submitted / suggested sites will take place initially to understand and advise on issues that would likely be of importance (in a similar context to a without prejudice pre-application discussion), and to advise on implications of any additional research / studies that would be necessary to prove viability. These discussions would likely intensify should the outcome of continued research suggest that additional residential development land is required or desirable.
- 4.7 Members will be aware that the schedule for preparation of LDP2 is contained in the Development Plan Scheme (DPS). The DPS should be updated annually. An update on progress and timescales will be presented at the Board meeting. The target date for adoption of LDP2 is autumn 2019, which means that work must progress quickly from considering implications arising from the Main Issues Report, to preparation of the proposed Development Plan. Once updated and published, the DPS must be forwarded to the Scottish Government for information (and thereafter used in performance target assessments).

Recommendation

Members are asked to note and consider the comments made on the Main Issues Report, the appropriateness of initial responses contained in the Initial Response document and associated Appendices, and note the amended timescale for LDP2 preparation in the DPS (a verbal report and update for which will be given at the Board meeting).

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Date: 24th April 2018

[Initial Response document and Appendices](#)