

Directorate for the Built
Environment
Planning Reform, ePlanning and
South Division

αβγδεζηιφκ

T: 0131-744 7761 F: 0131-744 7555
Neale McIlvanney
Planning &
Enterprise
South Ayrshire
Council
Burns House,
Ayr,

South Ayrshire Council Local Development Plan - Main Issues Report

12 July 2010

Dear Neale

Thank you for the opportunity to comment on the above Main Issues Report (MIR). This response is provided on behalf of the Scottish Government, including Transport Scotland and Historic Scotland.

The Scottish Government's policy on development planning is contained within Scottish Planning Policy (SPP) and Circular 1/2009 „Development Planning“. Our role is to ensure that plans reflect Scottish Ministers' priorities and to flag up and resolve any concerns early in the process. The response therefore covers general observations on the content of the MIR and specific comments on the main issues.

The recognition of the second National Planning Framework (NPF2) as a key document is welcomed. The Proposed Plan should ensure that the local and national infrastructure requirements identified in NPF2 and the Strategic Transport Projects Review (STPR) are supported and taken forward. We wish to work closely with you to support their delivery.

In the period since last plan was published a number of important publications have come forward. These include the Climate Change Act, the Renewables Action Plan, the National Renewables Infrastructure Plan and the Zero Waste Plan. The Scottish Government believe that these should be a key consideration during the preparation of the Proposed Plan and supplementary guidance. As you progress towards the Proposed Plan stage, we also ask that you have appropriate regard to the expectations of development plans as contained within the consolidated Scottish Planning Policy.

Main Issues Report - General Observations

Monitoring Statement

The monitoring statement appears to provide a thorough evidence base for the Main Issues which are identified in the MIR. The Scottish Government is of the view that the tables and diagrams are well presented and easy to understand.

In the household total on page 29 of the monitoring statement a figure of 51,050 is given for 2007. This differs from the GROS figure of 50,833. Clarification is therefore sought.

Main Issues and Preferred Spatial Strategy.

The Scottish Government is encouraged to see that the Main Issues are not solely focused on topics areas, but include the development of a number of key strategic sites. Such an approach relates well to the spatial strategy which is set out on page 8 of the MIR. The Scottish Government including its agencies, Transport Scotland and Historic Scotland, are generally content with the preferred spatial strategy.

Preferred vision and alternative visions

The preferred vision sets out to maximise economic growth in a way that is underpinned by sound social and environmental objectives. The inclusion of reasonable alternative visions which focus on economic, social and environmental approaches is welcomed as this will help stimulate debate and enable the reader to determine whether the preferred vision is the most suitable way for the development of South Ayrshire to proceed.

Maps

The majority of maps presented in the MIR are helpful and easy to understand. However, it is felt that the maps on page 10 (Map B) and pages 11-13 (Maps C to E) need to be improved if they will be in the Proposed Plan, including a description or key to explain the "traffic light system". This would make them easier to read and interpret.

Land Assessment Framework/Land Parcels

The approach to identifying suitable housing sites through a scoring matrix is commendable. If included in the Proposed Plan it would be beneficial if a greater explanation is provided of how these sites link into Maps B, C, D and E (land parcels and call for sites).

Significant areas immediately adjacent to the main settlements of Ayr and Prestwick are identified as having potential for development subject to mitigation. Transport Scotland have previously expressed concerns regarding further development immediately adjacent to the A77 corridor. While the Agency supports the strategy as indicated in Map A, any alternative option of development land releases being concentrated in Ayr, Prestwick and Troon as indicated in amber and red in Map B would give Transport Scotland cause for significant concern in terms of potential impacts on the strategic transport network and in particular the A77 trunk road corridor. Additionally, it would not support the alternative to Preferred Option 5, which focuses on the concentration of land release in Ayr, Prestwick and Troon, due to potential impacts on the strategic transport network.

Strategic Environmental Assessment

The MIR is a key stage for SEA, allowing for exploration of proposals and alternatives at an early stage. In particular, paragraph 47 of Circular 1/2009 states the report needs to contain enough detail and consider alternatives sufficiently at the strategic, policy and site-specific level to meet the statutory requirements for environmental assessment.

Engagement

The programme for consultation set out within the MIR appears to be thorough. It is encouraging to note that a series of community consultations are to be held to explore local issues arising from the MIR. The Scottish Government is also aware of the effort employed by the Council in undertaking pre-MIR consultation, which included area forums. Transport Scotland welcomes the engagement undertaken so far and seeks to continue to work closely with the Council at every stage of the plan process.

The Main Issues

Main Issue 1 – Glasgow Prestwick Airport

The inclusion of Glasgow Prestwick Airport as a Main Issue and the preferred option to prepare an Action Plan for the airport is supported given its reference in NPF2. The Scottish Government (this Branch and NPF team) and Transport Scotland would welcome continued liaison with the Council as the Action Plan is progressed.

The proposed Action Plan seeks to promote the Airport and surrounding land as a location for the development of office/industrial uses connected with renewable energy industries. Consideration should be given to how this would link to the wider strategy for the development of renewables in South Ayrshire.

Transport Scotland have requested that clarification of the first bullet point on Page 15 of the MIR is provided as the Agency would expect to see any necessary infrastructure enhancements on the strategic transport network identified prior to the Development Management stage. Transport Scotland has reviewed the current draft Surface Access Strategy (SAS) and there are a number of issues regarding the strategic road and rail network that require further detailed discussion. Transport Scotland intend to pursue further detailed discussions separately with the Council and other stakeholders on this matter.

Please refer to Annex 1 for detailed comments provided by Historic Scotland on the development outlined on Map 1.1 „Glasgow Prestwick Airport“.

Main Issue 2 – Housing

Supply and Distribution of Housing - the commitment to increasing housing supply in the MIR is welcomed. It will of course be important that the Housing Need and Demand Assessment (HNDA), is progressed to the point of completion - including its appraisal by the Scottish Government's Centre for Housing Market Analysis. This will provide a robust evidence base to inform the overall scale of the housing land requirement included in the Proposed Plan and its distribution across South Ayrshire, as well as the scale of affordable housing required and its distribution across sub Housing Market Areas.

Programming and Assessment Criteria of Housing Sites – take account of the impact of windfall sites as these have been significant in the past.

The MIR refers to the release of housing sites being phased. Phasing and infrastructure requirements and their impact on delivery of the spatial strategy, should be clear in the Proposed Plan.

The Proposed Plan should aim to be clear about the prioritisation process for all sites and how this will be monitored and enacted upon during the lifetime of the plan. It should also set out what consideration has been given to cross boundary issues and the implications for the strategy.

Affordable Housing Policy – the review of the Affordable Housing Policy and the identification of different policy options to meet affordable housing needs is welcomed. The balance of provision between affordable rented and intermediate tenures has a significant impact on development economics. It would be helpful, in the Proposed Plan or its supporting documents, to include a reference to the overall proportion of need for affordable housing which can be met by intermediate tenures (for example, shared equity, mid-market renting) within each Housing Market Area. This will need to be clearly informed by the completed HNDA.

Supplementary Guidance - The HNDA should inform the range of supplementary guidance being proposed, including masterplans and development briefs, especially in relation to the mix of house types and sizes required to meet the full range of housing need and demand across South Ayrshire.

Gypsies/Travellers – the Proposed Plan or its supporting documents should provide details of policy proposals for Gypsies/Travellers. In particular the Council should consider whether suitable locations or specific sites for Gypsies/Travellers can be identified.

Older People - the monitoring statement includes specific figures on the requirement for special needs housing. The Council should consider these figures and the issues around an ageing population to determine whether a response is required in the Proposed Plan.

Main Issue 3 – Ayr and Troon Ports

NPF2 recognises the value the Ayr and Troon ports and their inclusion as a Main Issue is supported alongside the planned approach to development. Regard should be had to the National Renewables Infrastructure Plan (N-RIP) when the Proposed Plan is prepared. N-RIP identifies a range of sites offering the potential to help Scotland become an established location for off-shore wind turbine manufacturing and construction operations. While Ayr and Troon have not been identified as phase 1 sites, they have been identified within N-RIP as medium term potential sites for distributed manufacturing. The Scottish Government supports the advancement of N-RIP.

Main Issue 4 – Craigie Estate

We note that the future development of this site will include the recognition of flood risk, the development of a masterplan and partnership working.

Main Issue 5 – Creating an Effective Transport Network

Transport Scotland welcomes the work undertaken by the Council in the “*South Ayrshire Corridor Study Appraisal of Transport Interventions from Future Residential Land Release*” Final Report (Nov 2008), also known as the A77 Corridor Study, which focuses on the transport infrastructure required to support the housing requirements of the Ayrshire Joint Structure Plan. It is noted that the Council intends to develop supplementary guidance to establish a mechanism for delivery of the identified transport infrastructure enhancements.

Transport Scotland supports the Council in developing a protocol for seeking developer contributions to meet infrastructure needs and notes that the MIR states that the LDP will set out particular circumstances in which the Council will seek developer contributions to meet infrastructure needs arising from development.

Preferred Option 19 refers to the A77 Corridor Study proposal for the provision of a rail halt with Park and Ride facilities at the housing development at South East Ayr. Its provision would impact on journey times and has not been identified as a national rail priority in STPR. Transport Scotland does not therefore support the provision of a new rail halt at South East Ayr and the reference should not be included in the Proposed Plan.

Main Issue 6 - Rural and Green Economies

Central Scotland Green Network - It would be helpful if the Proposed Plan could prioritise the brownfield sites to be included within the CSGN. The historic environment can also offer opportunities and so contribute to the GSGN and Preferred Option 20.

Galloway and Southern Ayrshire Biosphere - The Proposed Plan should seek to make spatial provision for any particular proposals or opportunities which are proposed to support the biosphere.

Dark Skies - The MIR states that a core area and buffer areas have been identified. It would be helpful if these can be shown on a map and clarity should be provided in the Proposed Plan on whether this status would restrict development or place particular conditions on development.

Open space audit / strategy - it would be beneficial if the early findings from the strategy could feed into the Proposed Plan.

Provision of Open Space and Maintenance - requirements for the provision of open space as part of new development should be set out either within the Proposed Plan or supplementary guidance.

The Coast - the proposed approach for coastal planning appears thorough. The Coastal Planning section of SPP should be referred to when preparing the Proposed Plan.

Greenbelt - as the MIR highlights how the role of the Greenbelt has changed since its original designation and sets out options relating to retention, review and alteration, the Proposed Plan should take account of the policy contained within SPP.

Main Issue 7 – Climate Change

The Scottish Government is encouraged to see climate change as a Main Issue.

Flooding – the reference to the impacts of climate change and the requirements of the Flood Risk Management (Scotland) Act 2009 is welcomed, though flood risk management plans will not be in place until 2015.

Sustainable Construction - the reference to the measures to introduce renewable technologies as part of building practices is supported. If appropriate, this could be expanded upon in the Proposed Plan to include renewable heat infrastructure. Preferred

Option 32 accords with the requirements of SPP, but please be aware that PAN 84 has been revoked.

Waste Management – We note that the LDP is to allocate waste management facilities that are consistent with Area Waste Plan, but this has been superseded by the Zero Waste Plan. Particular regard should be had to Annex B of the Zero Waste Plan „Role of Land-Use Planning to Deliver Zero Waste“.

It is understood that the MIR has focused on the provision of a municipal residual waste facility but does not include any reference to specific waste infrastructure needs for other waste arisings in the area. The MIR has not identified either specific sites for waste management facilities or the locational criteria to support site identification. By not including such sites within the MIR, a further SEA is likely to be required, including an addendum to the environmental report, for sites included in the Proposed Plan.

The Proposed Plan should address all waste management infrastructure and waste within all new developments in accordance with SPP and Annex B of the Zero Waste Plan. This includes setting out locational criteria to facilitate site identification, if appropriate. It is therefore expected that the Proposed Plan will include more details on waste management and the specific location of waste management facilities. It should also seek to identify industrial/employment land as potential areas for waste management and highlight the use of site waste management plans.

Air Quality - the Scottish Government is committed to improving air quality and is therefore encouraged to see that the Council are taking a pro-active approach to this issue.

Main Issue 8 – Meeting Infrastructure Needs

It is understood that the level of development proposed within the MIR is generally consistent with the levels appraised within the A77 Corridor Study. Consequently, the strategic transport interventions identified within this study required to support development, particularly the A77 corridor, are detailed in Preferred Option 19.

Preferred Option 35 (and alternative) - we seek clarification of why the distinction between two types of infrastructure provision is considered to be necessary as type 2 appears to be infrastructure which is desirable but not essential. This may result in difficulties when attempting to justify the need for an agreement as required by the necessity tests set out in Circular 1/2010. We would welcome further discussion on this matter.

Contributions towards the A77 and Preferred Option 36 – as you know, South Ayrshire Council and Transport Scotland are in the process of detailed discussions on the significant strategic transport interventions required to support the delivery of the Major Housing Release sites outlined in the Adopted Local Plan and Approved Structure Plan and which also form part of the MIR Preferred Spatial Strategy. These discussions also relate to the funding and delivery of the identified transport infrastructure enhancements and an acceptable methodology for apportioning contributions. The outcome of these discussions must inform the development of the statutory supplementary guidance referred to in Preferred Option 36, which will be central to the delivery of the required infrastructure enhancements, and as a consequence, to the delivery of the preferred spatial strategy. Transport Scotland is therefore committed to continuing this engagement and recognises the valuable Transport Appraisal work undertaken by the Council to date.

Main Issue 9 – Ayr Renaissance

The Council's ambitious strategy for the Ayr Renaissance is recognised in NPF2. The preferred options contained within this section of the MIR should contribute towards this.

Preferred Option 42 states the sequential approach would only apply to large scale retail development proposals, but this is contrary to SPP, which states that the sequential approach should be used when selecting locations for all retail and commercial leisure uses unless the development plan identifies an exception.

Main Issue 10 – Girvan Regeneration

The proposed strategy for the regeneration of Girvan identifies relevant opportunities and contains actions to support improvements. This is in line with SPP.

Main Issue 11 - Maybole

A positive approach is to be adopted for regeneration, including a masterplan. We are encouraged to see that this will include partnership working with the local community.

Additional Comments

Renewable Energy

Appropriate policies and proposals for renewable energy developments should be in the Proposed Plan and we appreciate that these may be rolled forward from existing plans and supplementary guidance.

Supplementary Guidance

A number of the preferred options are reliant on the production of supplementary guidance. The resource implications of these will have no doubt been considered. It would be helpful if the Proposed Plan sets out a timetable for the development of all supplementary guidance.

Historic Environment

The Proposed Plan should seek to highlight the benefits and opportunities the historic environment can bring. The historic environment can play a key role in building, supporting and regenerating communities, and there are synergies between what the historic environment can offer and the aspirations and issues informing the vision, such as the priority for better design and regeneration. It can engender community spirit, giving a sense of place and identity and help to create a place where people want to live and work.

Historic Scotland support the commitment within the MIR to masterplanning and welcome the preparation of supplementary guidance and development briefs. They would welcome involvement in the drafting of these and would be happy to be involved in this process.

Historic Scotland note that the existing policies relating to cultural heritage have been assessed as having been effective and have broadly achieved their objectives. On the basis that you are bringing forward these policies from the adopted plan, they are satisfied

that potential impacts on the historic environment will be mitigated, providing historic battlefields are included.

Historic Scotland would be happy to work with the Council as policies are updated. They would welcome the opportunity to discuss how these policies shall operate and how they fit with national policy, prior to the Proposed Plan stage.

Historic Scotland's comprehensive comments on development locations are attached as Annex 1.

Conclusion

The Scottish Government, including its agencies, will continue to work with the Council as it progresses this plan.

The comments provided within this response are given without prejudice to the Scottish Ministers' future consideration of the plan. Should you wish to discuss further any of the points raised in this response, I would be more than happy to meet with you.

Yours sincerely

Simon Pallant
Senior Planner

ANNEX 1 – Historic Scotland Comments on Development Locations

Dundonald

Allocation/land parcel 2 (ID 2 # 2) includes the scheduled monument, Property in the Care of Scottish Ministers and Category A listed building termed Dundonald Castle (Index No. 90112). The castle began as 12th century earth and timber motte and developed into a great royal tower house castle in the 1370"s. In the 12th century, a stronghold developed to counter threats from Galloway in the S and from the Norse in the W. It is located in a key strategic location, occupying a hilltop setting and there are extensive views out from the castle to the W, SW and NW. This is a significant and impressive defensive monument and an important visitor attraction. In caring for the castle on behalf of Scottish Ministers, our responsibilities include making it accessible to the public and therefore its landscape setting and the views to and from it are important to the visitor understanding and appreciation its origins and history. The castle"s setting should not be adversely affected by development immediately adjacent or close to it, however, some small-scale development may be possible further to the south of the castle.

This allocation also contains the scheduled monument termed Kemp Law, fort (Index No. 304), a dun situated on the steep-sided promontory that forms the ENE end of Kemp Law, which has been reduced to a massive mound of debris standing within a larger walled enclosure. We note that the monument is currently located within dense woodland and is situated in between two quarries located to the NW and SE. We consider that development may be possible accommodated within the area, but at an appropriate distance from the monument to protect its setting.

The Category A listed Auchans Castle (HB Num 984) which comprise the remains of a late 16th century house is also located within this allocation. We note that the building is currently set within a small clearing of mature woodland and enclosed grounds. We consider that it may be possible to accommodate development in parcels to the south-east and south-west, providing it didn"t adversely impact on the setting of Dundonald Castle.

West of Symington

Allocation/land parcel 3 (ID 2 # 3) includes the scheduled monument termed Wardlaw Hill, earthwork SSW of Harpercroft (Index No. 307). A 'citadel' fort or minor oppida occupying the entire summit plateau at about 145m OD, the monument comprises an inner fort or settlement on the highest point of the plateau and an outer defensive circuit. While the centre of the monument has been compromised by the radio mast, it still remains a prominent feature in the landscape. Development could be accommodated on lower ground to the south of the allocation.

The scheduled monument termed Wardlaw Hill, earthwork W of Harpercroft (Index No. 306) is also located within this allocation. A rough circular fort, it is situated on the summit of Wardlaw Hill at about 145m OD. Development could be accommodated on lower ground in the south of the allocation.

The scheduled monument termed Hallyards, farmstead 750m SW of (Index No. 5394) is also located within this allocation. This pre-improvement farmstead is located on the SE flank of a low hill, WNW of Wardlaw Hill and its setting is likely to fairly local/restricted,

given the domestic nature of the site. It may be possible to accommodate development on lower ground in the south of the allocation parcel.

In addition, the scheduled monument termed Kemp Law, fort (Index No. 304) is located N of this allocation. As noted above in relation to Dundonald, we consider that development could be accommodated within this area, but at an appropriate distance from the monument to protect its setting.

Troon

The scheduled monument termed Crosbie House, remains of (Index No. 7886) is located within allocation/land parcel 11 (ID 2 # 7). The monument comprise the remains of a late 15th/early 16th century tower-house standing to approximately first floor level. It is situated in the policies of Fullarton House within a strip of mature woodland. Some development may be possible in the area, providing it does not significantly intrude into the wooded area and at an appropriate distance from the monument.

The Category A listed Grey Gables, Southwood Road (HB Num 6385) is located within allocation/land parcel 13 (ID 2 # 9). Built in 1909 for William Alexander Collins of the publishing dynasty, this large 2-storey villa is one of a number of large sea-side villas in the vicinity, set in large gardens. The garden of Grey Gables is heavily wooded, with a large area of lawn to the south of the house. We consider that some small-scale development in the area may be possible.

Allocation/land parcel 15 (ID 2 # 10) includes the scheduled monument termed Nethermuir, homestead and enclosure 250m SW of (Index No. 4488), a cropmark of an oval, probable palisaded enclosure. It may be possible to accommodate some development within this large allocation/land parcel to the north and west of the monument, providing it does not significantly intrude into the wooded area of Crosbie House, remains of (Index No. 7886), which is located to the N of the allocation.

Prestwick and Glasgow Prestwick Airport

Historic Scotland note that the masterplan for the Airport has already been published and that an Action Plan is being prepared. While they will comment on the Action Plan in due course, they would wish you to take account of the comments below in relation to specific land allocations which are included within the Action Plan Area, outlined in Map 1.1 of the MIR.

The scheduled monument termed Shields, enclosure 500m E of (Index No. 5536) is located within allocation/land parcel 18 (ID 2 # 11A). The monument comprises the cropmarks of a D-shaped enclosure and we note that the A77 embankment cuts across the centre of the enclosure. We consider that some development may be possible in this area, providing it avoids further direct impacts on the monument.

The scheduled monument termed Whiteside, enclosure W of (Index No. 5261) is located within allocation/land parcel 26 (ID 2 # 13A). The monument contains a cropmark enclosure formed by a narrow ditch or palisade trench in the field immediately W of Whiteside steading. It may be possible to accommodate some small development to the very south of the monument by the road, and potentially to the north of it.

This allocation also contains the category A listed Macrae's monument (HB Num 14253). This fine obelisk monument was designed to be visible in the flat landscape and has to a large extent retained its original, designed function as a prominent feature. Its setting would be compromised by development located nearby, and therefore should be confined to an area along the southern boundary along the road.

This allocation also contains the scheduled monument and category A listed Monkton, windmill (Index No. 4340 and HB Num 14252). This 18th century vaulted windmill was converted for use as a dovecot during the early 19th century, and is a prominent conical feature in the landscape with a wide setting of flat fields. To protect its setting, any development should be restricted to the southern half of the allocation along the road.

Allocation/land parcel 27 (ID 2 # 13B) is located E of the category A listed Macrae's monument (HB Num 14253). As noted above, its setting would be compromised by development nearby, therefore the scale of development should be carefully considered.

Allocation/land parcel 28 (ID 2 # 14) includes the scheduled monument termed Shields, enclosure 500m E of (Index No. 5536). As noted above, we consider that some development may be possible in the area, although it should avoid direct impacts on the monument and leave sufficient open space around it to protect its setting.

Allocation/land parcel 31 (ID 2 # 15) includes the category A listed Neilshill House (HB Num 14355), a probable late 19th century, 2-storey villa. This is located within a small area of mature woodland and its setting has already been compromised by housing development within its policies. Provided that new housing is not built closer to the house than the existing development, we consider that some development may be possible in this area.

While we have the spatial data for a large area of coastal land located N of Prestwick (allocation 12 ID # 8), we note that the land assessment framework does not include this area. The scheduled monument termed Prestwick, Old Parish Church (Index No. 5883) is located W of this allocation. It comprises a 12/13th century roofless ruin stands within its walled burial-ground on an elevated site and is surrounded by an unscheduled kirkyard. A railway line lies to the west of the site with suburban development to the north, south and east. There are open views to and from the monument to the Clyde and Kintyre beyond to the west. Any development to the west of the monument should be of a massing and form which allows this open aspect to be retained.

Auchincruive

Allocation/land parcel 39 (ID 2 # 22) partly overlays the Auchincruive Inventory garden and designed landscape (GDL) which includes the category A listed Oswald's Temple (HB Num 996) and Oswald Hall (HB Num 99). In our recent response to the proposed mixed use development at Auchincruive, we accepted the principle of development, but identified that further assessment would be needed at the detailed stage to ensure that the village centre does not impact on the setting of Oswald's Temple. We noted that density, scale, location and new planting will require careful consideration to ensure that any development respects the integrity and understanding of the designed landscape, the setting of listed buildings and important views to and from them. We also stated that the direct impact on these listed buildings can only be assessed once detailed proposals are submitted for their alteration/conversion.

Allocation/land parcel 40 (ID 2 # 23) partly overlays the Auchincruive GDL. We note that this allocation includes the River Ayr and its banks only, part of which lies within the designed landscape. We would have significant concerns if it was to be allocated for development as this would result in further erosion of the GDL and consider that the GDL presents an opportunity to provide green space within a masterplanned context for the wider area.

Part of allocation/land parcel 41 (ID 2 # 24) is located within the Auchincruive GDL. If the area that falls within the designed landscape is to be retained as green space and protected by developer constraints, we would have no significant concerns. However, we would have significant concerns if this part of the land allocation was to be developed.

Although outwith the Auchincruive GDL, the E portion of allocation/land parcel 45 (ID 2 # 28) lies immediately to the S of it and acts as an important green buffer to preserve the parkland setting of the designed landscape. As part of the planning application for the mixed use development at Auchincruive, this area was largely retained as open space, which Historic Scotland welcome. If it was to be developed, we would have some concerns about its impact on the setting of the designed landscape.

Much of allocation/land parcel 47 (ID 2 # 30) lies outwith the Auchincruive GDL, but the northern part of it overlays the designed landscape. We would have significant concerns if it was to be allocated for development as this would result in further erosion of the GDL, and as noted above, consider that the GDL presents an opportunity to provide green space within a masterplanned context for the wider area.

In summary, significant development is proposed within and outwith the GDL which has the potential to significantly impact on it and therefore, this should be considered at the earliest opportunity with Historic Scotland.

Mainholm

Allocation/land parcel 46 (ID 2 # 29) includes the scheduled monument termed Glaisnock, ring-ditch 140m SE of (Index No. 5502), the cropmark remains of a ring-ditch which are situated in a field above the floodplain of the River Ayr. We consider that as the setting of the monument is fairly local/restricted, some development in the area is possible, although it should avoid direct impacts on the monument and leave sufficient open space around it to protect its setting.

West of Colyton

Allocation/land parcel 51 (ID 2 # 33) includes the scheduled monument termed Highpark, enclosure 250m NW of (Index No. 4436). The monument is a roughly circular earthwork which is a probable Iron Age settlement and the majority of the scheduled area is covered by dense woodland. We consider that development may be possible in the area, providing it avoids direct impacts on the monument and leave sufficient open space around it to protect its setting.

Lindston

Allocation/land parcel 61 (ID 2 # 43) includes the scheduled monument termed Lindston, moat (Index No. 2932). The earthwork remains of this possible henge are situated on level ground on the summit of a broad ridge. The monument is sited in the centre of the

allocated land and commands magnificent views in all directions. While some development might be possible within the allocation, its acceptability will depend on its nature, size and location in relation to the monument.

Whiteleys

Allocation/land parcel 68 (ID 2 # 47B) includes the scheduled monument termed Wallace's Stone, cross-incised stone (Index No. 5786) which is situated within a walled enclosure. Some screening is provided by mature trees located to the N and NE of the stone and there are presently open views towards the W. Due to the nature of the monument and its local/restricted setting, some development within the area may be possible. As the monument has open views towards the W, it would be appropriate to retain a reasonable buffer zone from the monument in this direction.

This allocation is also adjacent to the scheduled monument termed Craigmuir Mote, dun (Index No. 4866). This is an Iron Age dun situated on a low knoll on a terrace overlooking the River Doon. It is naturally defended by steep slopes on all sides except the WNW. Although it is presently set within dense mature woodland, it would have originally had good views to the NW & SE. We consider that development in the area may be possible, providing it does not occur within the immediate wooded area.

Newark

Allocation/land parcel 72 (ID 2 # 51) contains the C(S) listed building and scheduled monument termed Brigend Castle (Index No. 5268) which comprise a ruinous probable 16th century tower-house standing in parts to about 1st floor level. It is situated at the head of a small promontory overlooking the River Doon and is located within dense woodland. We consider that development may be possible in the area, providing it does not occur within the existing wooded area.

The allocation also contains the scheduled monument termed Craigmuir Mote, dun (Index No. 4866). As noted above, while currently situated in woodland it would have originally had good views to the NW & SE. Development may be possible within the area, providing it does not occur within the immediate wooded area.

The allocation also includes the category A listed Newark Castle (HB Num 14300), a 16/17th century tower house and a fine example of the development of a Scottish Castle over several centuries with historic connections to the Kennedy family. It is orientated N-S with relatively open views to the N and stands on raised ground, making a major contribution to the landscape when viewed from the N. We note that presently existing woodland is located to the S of the building, but there is less woodland to the N. Although there has been some low-scale agricultural development to the N, we consider that development in this location could detrimentally affect the setting of the house.

Bower Hill

Allocation/land parcel 75 (ID # 2 52A) includes the scheduled monument termed Heads of Ayr, fort 1050m NNW of Genoch Farm (Index No. 5594). The cropmark remains of this double-ditched fort cut off the SE approach to the steep-sided promontory that forms the W end of the Heads of Ayr cliffs. The monument sits in the NW corner of the allocated land and development may be possible in the southern half of the allocation.

Doonholm

We note that allocation/land parcel 76 (ID # 2 53A) contains allocation H2B which is allocated for residential development in the adopted Local Plan and that the remainder is a new allocation. The scheduled monument termed Alloway, motte (Index No. 2864) is located within this allocation. The remains of this probable ringwork are situated on the edge of an escarpment overlooking the River Doon and it is located within presently existing dense woodland and located close to existing housing development. Some development may be possible in the area, providing it does not intrude into the wooded area.

Greenan

We note that part of allocation/land parcel 78 comprises allocation TOUR 4 which is allocated for tourism development in the adopted Local Plan, and that the remainder is a new allocation. It contains the category B listed and scheduled monument termed Greenan Castle (Index No. 319), a medieval tower and earthwork defences and the remains of the Iron Age promontory fort these overlay. It is prominently set on the cliff and has an impressive defensive setting and we would have significant concerns if development were to impact on the setting of the castle.

We also note that allocation/land parcel 71 (ID 2 # 50) is E of the category B listed and scheduled monument termed Greenan Castle (Index No. 319). As above, we would have significant concerns if development in this area were to impact on the setting of the castle.

The Historic Environment at the Local and Regional Level

Historic Scotland note that a number of B and C(S) listed buildings are either within, or adjacent to, allocations/land parcels. On the basis that you are bringing forward policies from the adopted plan, they are satisfied that potential impacts on the historic environment will be mitigated. Historic Scotland also note that some allocation/land parcels contain Conservation Areas, and while some development may be possible in these locations, you should be satisfied that it preserves or enhances their character. In addition, Historic Scotland support those policies identified in the plan that are supportive of proposals for the conversion of traditional and historic buildings that are genuinely redundant, such as facilitating the restoration of listed buildings, and ensuring regeneration, long-term townscape preservation and enhancement, and would welcome their involvement, where appropriate.

Neale McIlvanney
Supervisory Planner
South Ayrshire Council
Planning and Enterprise
Burns House
Burns Statue Square
Ayr KA7 1UT
By e-mail only

Your ref:

Our ref:
SAC/LDP/01/C2570438

Date:
4 October 2011

Dear Neale,

SOUTH AYRSHIRE LOCAL DEVELOPMENT PLAN – POTENTIAL PROPOSED PLAN SITES

Thank you for providing Transport Scotland with the opportunity to comment on the potential sites for inclusion within the Proposed South Ayrshire Local Development Plan. The consultation to date on the plan has been constructive and we trust you will find these comments beneficial in finalising the Proposed Plan.

As requested, the comments outlined below relate to sites and settlements where Transport Scotland considers there to be a strategic issue, however additional comments have been provided to assist the Council in what has been a thorough assessment of all the sites. It is recognised that the sites presented provide twice the amount of land required to deliver the number of units that need to be released within the Local Development Plan. Further more informed comment can be provided once the number of sites has been refined, which this exercise will contribute to. However, please find below initial views on the cumulative impacts on the trunk road arising from development as presented.

Developer Contributions

Transport Scotland is aware of and supports the Council's intention to develop supplementary guidance to establish a mechanism for delivery of the identified transport infrastructure enhancements as detailed within the Main Issues Report (MIR). The MIR stated that the LDP will set out particular circumstances in which the Council will seek developer contributions to meet infrastructure needs arising from development. Deliverability is at the core of all development, particularly in the current climate, and such guidance should assist in providing greater clarity on this matter. Transport Scotland would value further engagement within the development of the supplementary guidance to ensure that the infrastructure required to support the Plan allocations are delivered.

Ayr

Site 114 – This site is located east of and adjacent to the A77(T) and as such is remote from the main settlement of Ayr and associated local facilities. No indication of an access strategy has been proposed to date, however, given current Scottish Government policy, direct access to the trunk road should be avoided as far as practicable. With this in mind and given the location of the development and the prevailing conditions on the A77(T), Transport Scotland would not support development at this location.

Site 12, 146 and 149 – The cumulative effects of these sites has the potential to impact upon the A77(T) Whitletts roundabout. This should be considered within the wider mitigation measures brought forward for the A77(T) corridor.

Symington

Transport Scotland has significant safety concerns over this section of the A77(T) adjacent to Symington. As a consequence, a scheme of grade separation is proposed at this location and until such time that the scheme is completed, Transport Scotland would not support further development at Symington.

Monkton

Transport Scotland has significant concerns with any further development at this location which would likely exacerbate current problems at the A77(T) Dutchhouse roundabout. The scale of potential development on sites 103, 104 and 160 is such that significant improvements may be required at Dutchhouse, with the uncertainty as to what form these would take and indeed if they could be delivered. The proposed developer contribution mechanism being developed by the Council to gather funds for improvements to the A77(T) at this location should be taken into consideration when allocating sites.

Transport Scotland also seeks clarification regarding site 160, which proposes 991 houses over 2 sites. The site to the west and which extends north to the A77(T) and the Dutchhouse roundabout includes land that has planning permission for a park and ride. Therefore, it is considered the site allocation boundary should be amended to reflect this.

Maybole

Transport Scotland has serious concerns regarding the A77(T) at this location and any further development will exacerbate current problems of congestion and safety at junctions through Maybole. An integrated solution will be required to improve the network at this location and developers will be required to contribute to any identified improvements. Transport Scotland is likely to resist further development until such time that appropriate improvements are identified with associated phasing. Developments will require to be phased in conjunction with any proposed improvements works.

Minishant, Ballantrae, Kirkoswald

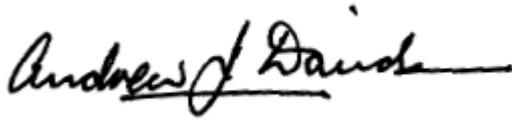
In accordance with Scottish Government policy, access to the sites should be taken from the local road network. Direct access onto the trunk road should be avoided as far as practicable. Additionally, any potential impact to the strategic road network should be identified and any improvements shall be agreed with Transport Scotland and included within the Proposed Plan and associated Action Programme.

Coylton

Any potential impact at A77(T)/A70 Holmston roundabout should be considered within the wider mitigation measures brought forward for the A77(T) corridor.

I trust the above comments will prove useful in the final stages of the plan preparation. Please do not hesitate to contact me should you wish to discuss any of the comments further. Transport Scotland looks forward to continuing discussions with South Ayrshire Council as the development plan progresses.

Yours sincerely,

A handwritten signature in black ink that reads "Andrew Davidson". The signature is written in a cursive style with a horizontal line extending to the right.

Andrew Davidson

c.c. Deborah Livingstone, JMP Consultants Ltd

Proposed Local Development Plan Consultation Event (27/08/12 to 16/11/12)

Comment by: Scottish Government (Mr Simon Pallant) 19/10/12

Modification Sought:

As planning authority, South Ayrshire Council, rather than developers should be responsible for carrying out the focussed transport appraisal of sites to inform the spatial strategy by providing evidence that the sites are viable and effective and identifying what, if any, new transport infrastructure would be required to support the developments.

Representation:

A) Appendix D - Proposed Housing Release Sites: Appendix D of the Proposed Plan provides information on the LDP allocated housing sites which have been identified as a result of a shortfall in the housing supply target. The table within Appendix D includes a column entitled "major infrastructure constraints", which states that the release of specific housing sites at Ayr (ref 70), Coylton (ref 73, 77), Maybole (ref 88, 91) and Monkton (ref 94) will be subject to assessment of their impact on the strategic road network. Transport Scotland understands that no appraisal has been undertaken to determine what, if any, transport infrastructure interventions are required to support delivery of these allocations. This information is considered of critical importance to ensure that proposed developments are supported by the appropriate nature and scale of infrastructure and to ensure, as far as practicable, certainty on its delivery. Discussions between Transport Scotland and South Ayrshire Council in January 2012 established which of the proposed housing sites being considered by the Council for inclusion in the Plan were unlikely to have any significant effect on the operation or safety of the trunk road network and would therefore not need to be subject to any further appraisal in advance of publication, of the Proposed Plan. Those discussions also identified the need for some appraisal work to understand the potential impacts of the proposed housing sites at Ayr (Action reference 70), Coylton (ref 73-77) and Monkton (ref 94) on, respectively, Whitletts roundabout, Holmston roundabout and Dutch House roundabout, all on the A77 trunk road. In addition, Transport Scotland recommended that the impact of the sites in Maybole (ref 88, 91) on the existing trunk road junctions within the town be assessed.

B) Action Programme: The Action Programme contains site specific actions in respect of these proposed housing sites at Ayr, Coylton, Maybole and Monkton which require that transport appraisals be undertaken by developers prior to the examination of the plan. This approach is clearly inconsistent with paragraph 167 of SPP which states that "planning authorities should appraise the pattern of land allocation, including previously allocated sites, in relation to transport opportunities and constraints based on the current or programmed capacity?. The determination of a site's viability in transport terms is a significant factor in determining its inclusion within a development plan. All necessary appraisal work should be carried out at the initial site selection process, to establish which sites are effective and can contribute to the spatial strategy. This should not be left until the spatial strategy has been finalised and the plan is to be submitted for examination. Indeed is not clear as to how the spatial strategy can be determined without such appraisal being undertaken. Without appraisal of the aforementioned sites at Ayr, Coylton, Maybole and Monkton in advance of the publication of the Proposed Plan it is unclear how South Ayrshire Council can be certain

of the viability or effectiveness of its spatial strategy. This lack of knowledge on the proposed sites' viability places the plan's spatial strategy in doubt as the evidence base for the inclusion of is unclear. This is contrary to SPP which states that development plans should demonstrate the underlying reasons for the preferred location of development and that authorities should appraise the pattern of land allocation in relation to transport opportunities and constraints. In light of the above, Transport Scotland is unable to support the Proposed Plan and the associated spatial strategy until such time as the appraisal of the sites at Ayr, Coylton, Maybole and Monkton, discussed between Transport Scotland and the Council in January 2012, has been undertaken to determine the potential effects on the strategic transport network, and as a consequence what, if any, transport interventions are required to support the delivery of the Local Development Plan.

C) Possible Alternative Housing Land Allocations: Transport Scotland considers it likely that alternative housing land sites will be submitted by land owners or developers for consideration through representations to the Proposed Plan. Should alternative sites come forward in this way, Transport Scotland would expect the SPP requirements for appraisal and the identification of any new transport infrastructure to be applied to those alternative sites. Transport Scotland would also expect to be consulted on any changes which may result in trunk road or rail issues.

Development and Strategic Transport Planning Branch
Major Transport Infrastructure Projects

Buchanan House, 58 Port Dundas Road, Glasgow G4 0HF
Direct Line: 0141 272 7587, Fax: 0141 272 7560
David.Torrance@transportscotland.gsi.gov.uk



CÒMHDHAIL
ALBA

TRANSPORT
SCOTLAND

Ms Christina Cox
Planning Manager
Community, Enterprise & Development
Burns House
Burns Statue Square
Ayr
KA7 1UT

Your ref:
LDP Comment ID 273

Our ref:
SAC/LDP/01

Date:
04 September 2013

Dear Christina,

SOUTH AYRSHIRE PROPOSED LOCAL DEVELOPMENT PLAN

Updated Representation Position

Following our meeting of 11th July 2013 and further consideration of the sites discussed, Transport Scotland's updated response in relation the Proposed Local Development Plan is set out below. For ease of reference it is noted that the previous response was given Comment ID 273.

Site AYR1

Transport Scotland wishes to withdraw the representation made on this site following the confirmation that it is not adjacent to the strategic transport network and has a capacity of circa 67 units. The allocation is therefore unlikely to have any significant impact on the Trunk Road network.

Monkton

Transport Scotland is willing to withdraw the representation regarding sites in Monkton subject to the Local Development Plan specifying the need for a masterplan process and overarching Transport Assessment to be undertaken. The Transport Assessment will be carried out to the satisfaction of Transport Scotland and any identified mitigation implemented as appropriate.

Maybole

Transport Scotland is willing to withdraw the representation regarding sites in Maybole subject to the Local Development Plan specifying the need for a masterplan process and overarching Transport Assessment to be undertaken. The Transport Assessment will be carried out to the satisfaction of Transport Scotland and any identified mitigation implemented as appropriate.

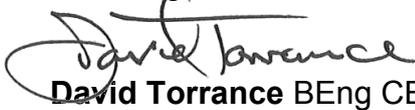
.

Other Comments

The representations on other sites and issues made in the previous response still stand but will be reviewed if further information is provided.

Please feel free to call if you have any queries or if you wish to discuss.

Kind Regards,



David Torrance BEng CEng MICE MCIHT

cc: Graeme Purves, Scottish Government Planning and Architecture