East Ayrshire Council

East Ayrshire Local Development Plan 2

Monitoring Statement

June 2020

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1. Introduction

1.1. What is a Monitoring Statement?

1.1.1. Local Authorities require by Planning Circular 6/2013: Development Planning to prepare a Monitoring Statement (MS) to support the preparation of any new Local Development Plan (LDP), and to publish a MS together with a Main Issues Report (MIR).

1.1.2. This MS has been produced to help inform a discussion around the performance of the East Ayrshire Local Development Plan (EALDP) 2017. Although the LDP was adopted relatively recently, the MS to some extent provides a means of identifying how far the vision and objectives of the plan have been realised thus far. The MS highlights important changes in the profile of the Local Authority area of material interest to plan making and uses a qualitative and quantitative analysis of developing statistical trends and policy performance to provide part of the evidence base for preparing the new East Ayrshire Local Development Plan (EALDP2). The MS links to other background reports and studies and provides some clarity for those issues raised in the MIR.

1.2. Structure

1.2.1. This MS follows as closely as possible the same policy headings outlined in the EALDP. The Statement is divided into two main parts:

> **Changes** - Key changes to the principal physical, economic, social and environmental characteristics of the area since 2012. Each section contains a general description of changes that have occurred and touches on Council initiatives aimed at improving conditions
>
> **Impact** - The impact of each of the strategies of the Local Development Plan is assessed and information presented in terms of changes since the adoption of the LDP in 2017 and in the years since the MS for the first LDP was published in 2012

1.2.2. A robust and pragmatic approach has been taken in gathering supporting data and selecting monitoring periods best suited to capture trends and performance. The data gathered is drawn from numerous sources of statistical analysis, including independent agencies and bespoke Council monitoring systems. In all cases, monitoring periods and information sources are clearly identified.

1.2.3. Due to the short time period that has elapsed since the adoption of LDP in 2017, this report will also monitor changes that have taken place in the time since the publication of the LDP MS in 2012. All statistics refer to the East Ayrshire Council area unless otherwise stated.

1.2.4. The monitoring period explained:
- 1st Jan 2012 to 31st Dec 2019 (Monitoring Statement 2012 & first 3 years of LDP 2017);
- Where bespoke data on the current LDP is required 1st Apr 2017 – 31st Mar 2019;
- Longer term trends – as deemed appropriate e.g. population change;
- Secondary data – time periods most closely aligned to 2012-2019

1.2.5. Background - East Ayrshire Council (EAC) adopted its most recent Local Development Plan (EALDP) in April 2017. The LDP sets out how EAC wants to see East Ayrshire develop over the

10 to 20 following from that date. It is expected that the LDP will have a lifetime of 5 years, and as part of EAC's ongoing plan-making function, work on a replacement plan (EALDP2) has now begun.

1.2.6. **Continuous Monitoring** - The EAC planning service undertakes a programme of ongoing monitoring to support the plan preparation process. The data, which covers a wide range of indicators, exists as a robust evidence base from which to prepare and assess plans, policies, strategies and actions. Whilst it is possible to gather information solely at the plan preparation stage, it is more effective if monitoring is an ongoing process, in order to identify long term trends, as well as to ensure that there is up to date and readily available data. Data gathered by the EAC planning service acts as a means of monitoring the effectiveness of the policies and proposals outlined in LDP. The most up to date information possible to obtain has been employed in this statement.

FIGURE 1. THE BARONY A FRAME, AUCHINLECK – KEY TOURIST ATTRACTION AND PROMINENT LANDMARK

SOURCE: EAC

2. National & Local Policy Background

2.1. The Planning (Scotland) Act 2019

2.1.1. The Planning (Scotland) Bill was introduced to The Scottish Parliament on 5th December 2017. Stage 2 of the Bill preparation process was completed in November 2018 and the Bill passed Stage 3 on the 20th of June 2019. The Bill received Royal Assent in July 2019.

2.1.2. The Planning (Scotland) Act 2019 will be followed by secondary legislation aimed at providing detail on how new and reformed processes will work, followed by new policy and guidance from the Scottish Government. The renewal and combining of NPF and SPP will be an important element of this and the Scottish Government has, in the context of the coronavirus (COVID-19) emergency, timetabled that consultation on a hybrid NPF4 will take place during 2021.

2.1.3. An MS and MIR are no longer statutory requirements under the Planning (Scotland) Act 2019, however, it is intended at this stage that the LDP2 preparation process will continue to follow the framework outlined by the Planning etc. (Scotland) Act 2006. The MS and MIR will therefore be prepared as before.

2.2. East Ayrshire Local Development Plan 2 (EALDP2)

2.2.1. East Ayrshire adopted a new Local Development Plan (LDP) in April 2017. The LDP plans for 10 to 20 years ahead in order to help plan the future development of East Ayrshire. It is expected that the current LDP will have a lifetime of 5 years and therefore, as part of the ongoing plan making function of the East Ayrshire planning authority, work on a second LDP (LDP2) has now begun and has reached MIR stage. The new Plan is expected to be adopted in 2023.

2.3. East Ayrshire Minerals Local Development Plan (MLDP) 2020

2.3.1. This MS is an assessment of the outcomes of the East Ayrshire Local Development Plan (EALDP) 2017. A number of older minerals-specific plans and policies continued alongside but were separate to the EALDP for several years after its adoption and prior to the adoption of the Minerals Local Development Plan (MLDP) 2020. As such, this MS does not contain specific reference to minerals. It is however intended that minerals-related policies will be included in LDP2, superseding both the EALDP and the Minerals plan. A separate MS was produced for the MLDP and can be viewed at The Opera House, 8 John Finnie Street, Kilmarnock or seen on the Council's website at:

https://www.east-ayrshire.gov.uk/Resources/PDF/M/MLDP-Monitoring-Statement.pdf

3. Changes

How has East Ayrshire changed since 2012?

This section will set out the changes that have taken place in East Ayrshire since both the adoption of the 2017 Local Development Plan and the 2012 Monitoring Statement for that plan. The headings of each section of the LDP have been employed to provide a structure against which a commentary can be made.

FIGURE 2. THE BUCK'S HEAD, GALSTON – A HISTORIC PUBLIC HOUSE REFURBISHED AS PART OF THE GALSTON CARS


SOURCE: EAC

3.1. Population

3.1.1. **Introduction** – East Ayrshire faces substantial challenges as a result of both a decline in its total population but also a year-on-year increase in the number of elderly residents. Whilst the Council area is expected to experience a small level of inward migration in the years ahead, this is expected to be substantially offset by a higher number of deaths than births.

3.1.2. **Resident population has stabilised** - East Ayrshire's population has remained relatively stable in recent years, with a slight decline of around 0.7% being recorded between 2012 and 2018. As a proportion of Scotland's population, East Ayrshire has shown a gradual but modest percentage share reduction over the last 10 years; 2.2% of the total in 2018 compared to 2.3% in 2008. More deaths than births were recorded in East Ayrshire between 2008 and 2018, resulting in a slight natural change of -757 people.

3.1.3. Over the last decade or so, East Ayrshire has attracted a fluctuating, but generally positive level of net migration. A period of negative migration during 2011-2014 coincided with a time of economic downturn resulting from the closure of Scottish Coal, Diageo and several other major employers.
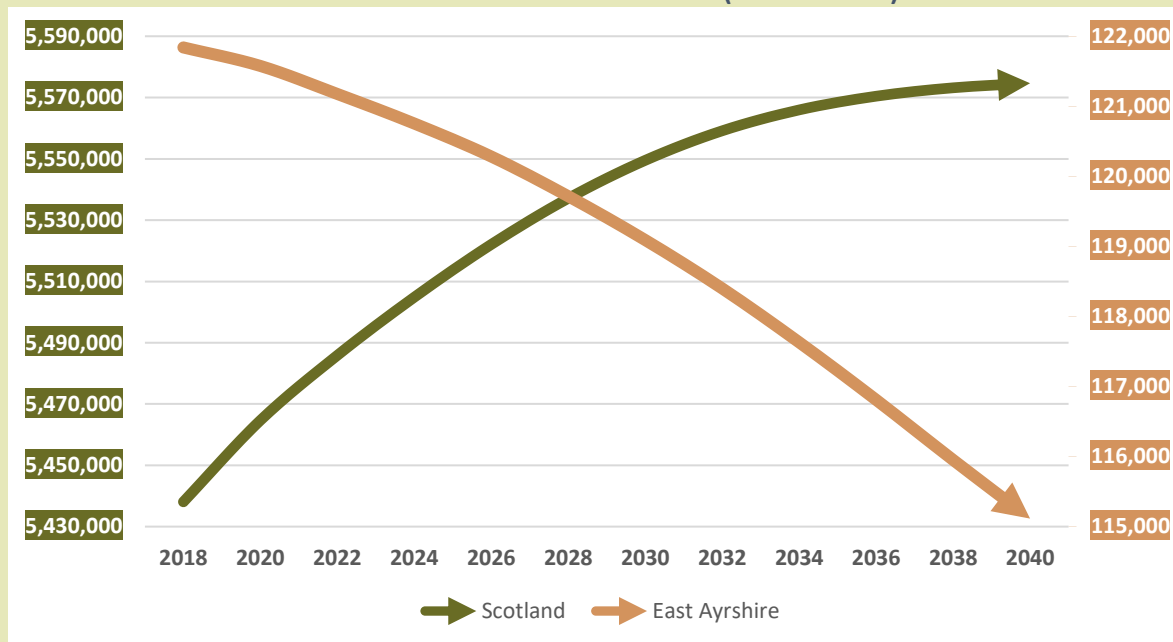
FIGURE 3 POPULATION CHANGE IN EAST AYRSHIRE AND SCOTLAND (2008 TO 2018)
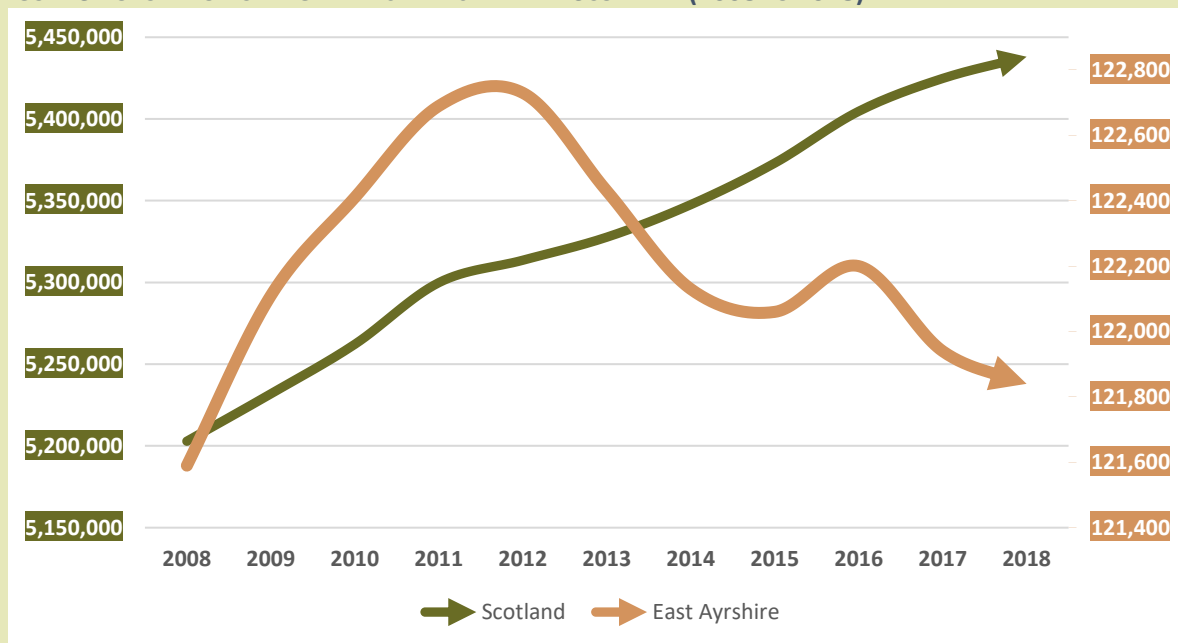
SOURCE: NATIONAL RECORDS OF SCOTLAND

3.1.4. **Population is projected to decline slightly** - Population projections estimated by National Records for Scotland (NRS) in 2018 suggest that the total population of East Ayrshire is expected to fall to 115,115 by 2040, a reduction of 5.4% from the figure of 121,723 projected for 2019. This reduction will occur at the same time as the population of Scotland as a whole is projected to increase by 2.5%.

FIGURE 4 PROJECTED POPULATION OF EAST AYRSHIRE AND SCOTLAND (2018 TO 2040)

SOURCE: NATIONAL RECORDS OF SCOTLAND

3.1.5. **The population is ageing** - When considered in finer detail, the projected population change for East Ayrshire in the years 2018 to 2040 indicates that only the 65+ age group is likely to experience an increase in proportion, with those over 75 rising in percentage terms by 54%. All age groups other than those over the age of 65 are expected to experience a reduction in numbers; the number of people aged 65+ will increase by 27%. It is therefore hoped that the Ayrshire Growth Deal (AGD) will stimulate employment growth and attract a younger demographic to the area.

FIGURE 5. PROJECTED CHANGE IN SIZE OF AGE COHORTS (2018 TO 2040) IN % AND NUMBER OF PEOPLE.
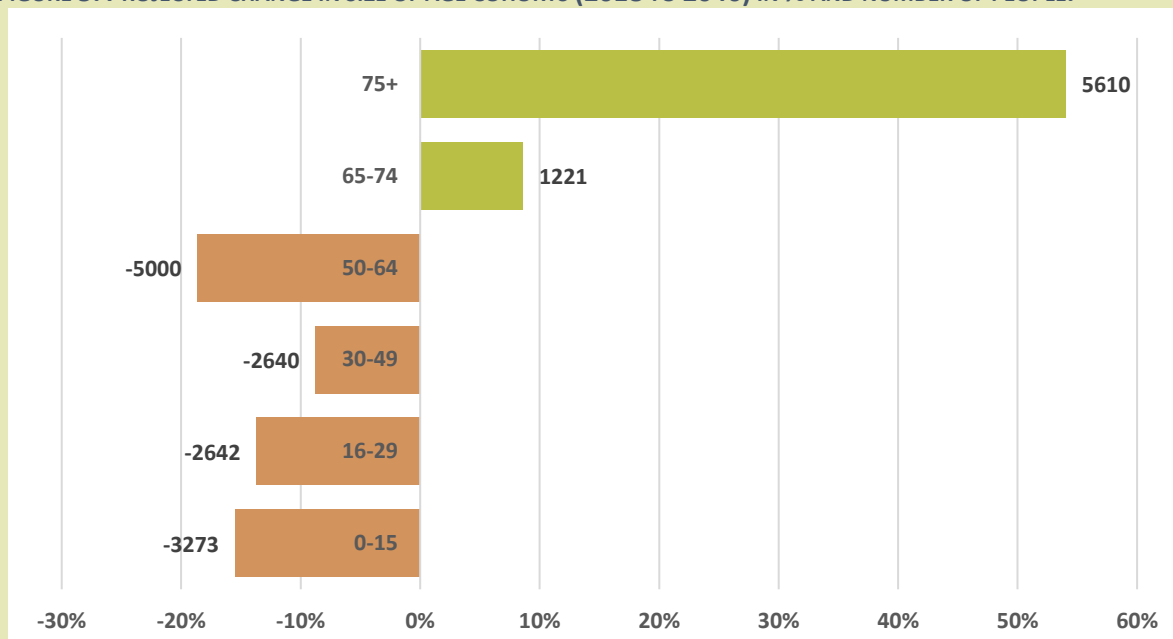
SOURCE: NATIONAL RECORDS OF SCOTLAND

3.1.6. **Some areas have experienced population decline** - A division of population change into LDP Sub Housing Market Areas (SHMAs) reveals that, whilst the Kilmarnock area and East Ayrshire as a whole has seen a modest increase in population, other areas have witnessed decline.

FIGURE 6. POPULATION CHANGE 2006-2016 BY SUB HOUSING MARKET AREA

SOURCE: EAC MONITORING

3.1.7. **Negative natural change will surpass inward migration** - Any net/inward migration is expected to be offset by negative endogenous growth (natural change), driven by a higher number of deaths than births over the Scottish Government's 2018 to 2043 forecasting period.

FIGURE 7. PROJECTED COMPONENTS OF POPULATION CHANGE (2018/19 TO 2042/43)
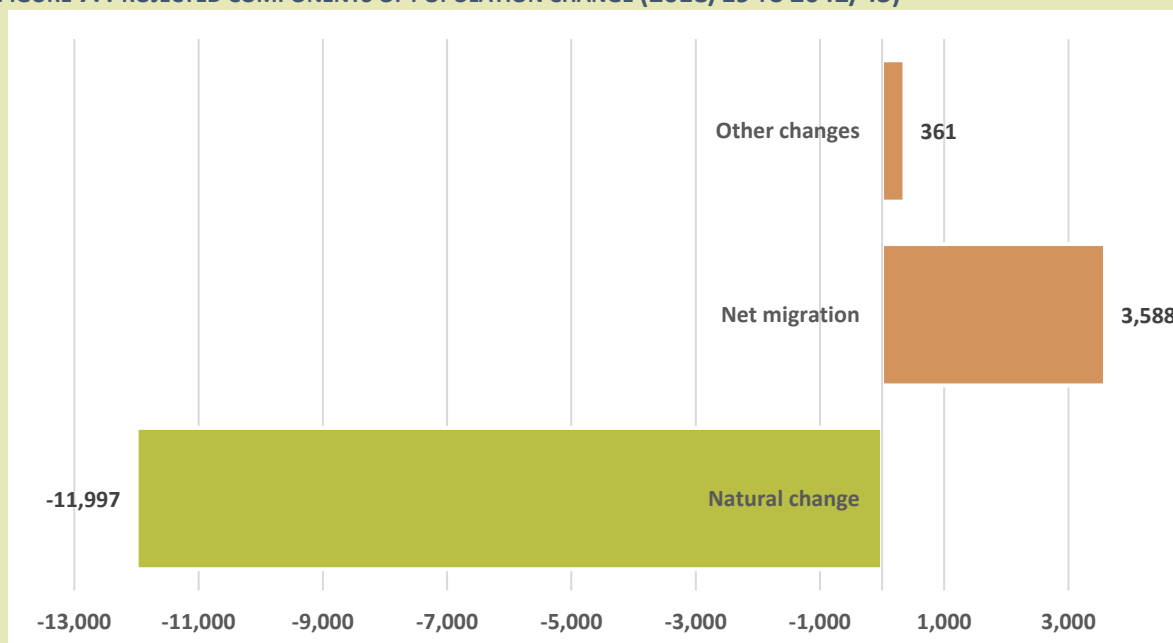
SOURCE: NATIONAL RECORDS OF SCOTLAND

3.2. Education

3.2.1. Introduction – Improving educational outcomes is one of the key aims of East Ayrshire Council. The planning service supports this ambition though the careful allocation of housing sites in the Local Development Plan to avoid overcrowding at schools, the allocation of land to accommodate new schools, the protection of such sites from competing uses, the requirement for various forms of infrastructure to support schools and the careful location of schools to avoid areas of flooding.

FIGURE 8. CONSTRUCTION OF ROBERT BURNS ACADEMY AND LOCHNORRIS PRIMARY SCHOOL/BARONY CAMPUS

SOURCE: EAC

3.2.2. People are better educated – The overall level of educational attainment was lower in East Ayrshire than the Scottish average in 2018, particularly in terms of the number of people holding higher education level qualifications. It is the case however that more people are educated to higher education level than ever before and less people had no qualifications in 2019 than in 2012 (ONS). Nevertheless, relatively higher levels of economic inactivity, and relatively lower educational attainment combined with significant parts of East Ayrshire's settlements falling into the 0-20% most deprived SIMD Datazones make it crucial that East Ayrshire remains a successful location for retained business activity and future economic development.

Legend: NVQ 4 + ● No Qualifications
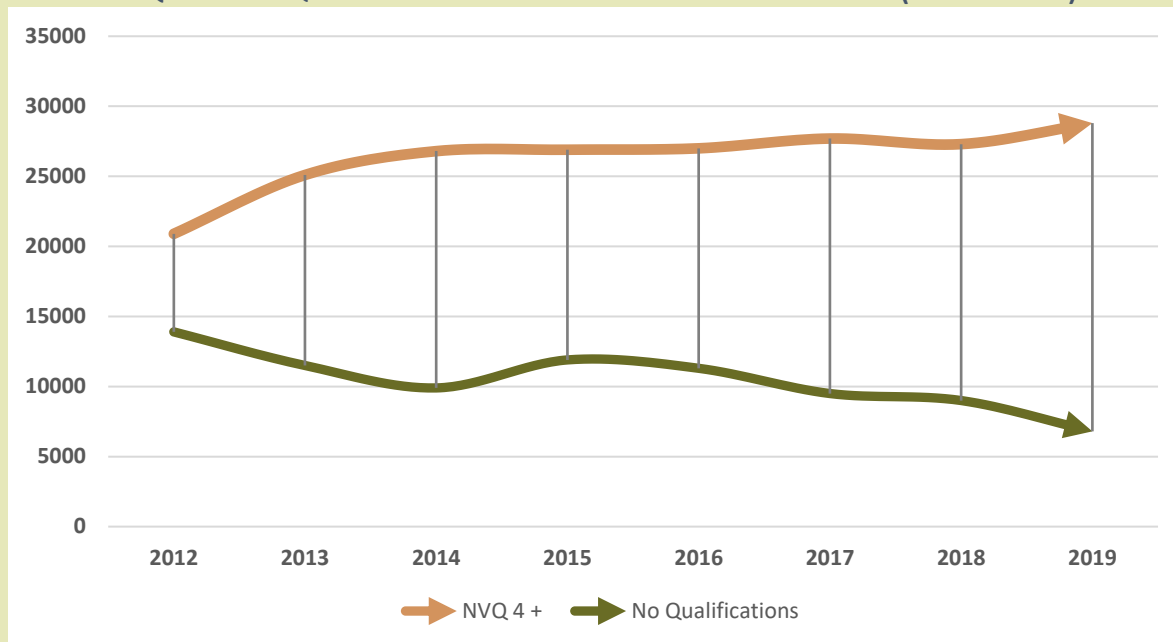
SOURCE: ONS. NVQ+ REFERS TO THOSE QUALIFICATIONS OF HIGHER EDUCATION LEVEL OR GREATER

3.2.3. **The Council has invested in schools** - The Council has invested heavily in new school buildings since the adoption of the LDP in 2017. The high profile opening of the multi-stream William McIlvanney Campus in April 2018 saw the amalgamation of Kilmarnock Academy, James Hamilton Academy, Silverwood Primary School, New Farm Primary School and the Early Childhood Centre onto a single site. Other facilities including a leisure centre and Gaelic language unit are also located within the campus. A large number of other developments, including new primary schools and extensions have also been delivered.

3.3. Placemaking

3.3.1. **Introduction** – Placemaking lies at the heart of the EALDP policy framework and will continue to be to the fore as LDP2 is prepared. Much has been achieved in recent years, particularly in Galston, Cumnock and Kilmarnock.

3.3.2. **The LDP has prioritised placemaking** - As well as indicating where sustainable development should occur, the current LDP is more 'place' focussed than previous local plans. The LDP takes a proactive approach to how we can create more successful places as well as containing general placemaking and design principles that all development proposals must meet.

3.3.3. The LDP contains an introductory section on Placemaking which includes annotated maps showing how the five service centre towns in East Ayrshire can become more successful places. Projects identified on these maps are carried through into the LDP Action Programme which sets out how they will be delivered with developer contributions linking into this process where appropriate. Although this is a new approach taken in the LDP, many of the cited projects have had a gestation period which preceded the LDP.

3.3.4. **New placemaking maps have been produced** - Maps for Cumnock, Dalmellington, Galston, Stewarton and Kilmarnock were produced prior to the adoption of the LDP in 2017. It was determined that further maps would be produced to encompass every key settlement in East Ayrshire and three maps have been published since the adoption of the LDP. These identify, in spatial terms, the priorities of people engaged in the development of Community Led Action Plans for each settlement.

FIGURE 10. ADOPTION OF PLACEMAKING MAPS/ACTION PROGRAMMES BY SETTLEMENT

Placemaking Map/Action Programme	Date of Adoption
Cumnock Placemaking Map and Action Programme	Pre-LDP
Dalmellington Placemaking Map and Action Programme	Pre-LDP
Galston Placemaking Map and Action Programme	Pre-LDP
Stewarton Placemaking Map and Action Programme	Pre-LDP
Kilmarnock Placemaking Map and Action Programme	Pre-LDP
Newmilns and Greenholm Placemaking Map and Action Programme	**July 2018**
Ochiltree Placemaking Map and Action Programme	**April 2019**
Catrine Placemaking Map and Action Programme	**April 2019**
North West Kilmarnock Placemaking Map and Action Programme	In progress
New Cumnock Placemaking Map and Action Programme	In progress
Mauchline Placemaking Map and Action Programme	In progress
Auchinleck Placemaking Map and Action Programme	In progress
Dalrymple & Hollybush Placemaking Map and Action Programme	In progress
Kilmaurs Placemaking Map and Action Programme	In progress
Hurlford & Crookedholm Placemaking Map and Action Programme	In progress
Darvel & Priestland Placemaking Map and Action Programme	In progress

3.3.5. **Progress has been made in Kilmarnock** – The following projects had been completed or were underway as of summer 2019:

- The Dean Castle Country Park redevelopment,
- Cunninghame House: housing improvement area,
- The HALO urban renewal project - commenced,
- Ayrshire College - completed,
- The Ingram Enterprise Centre - completed,
- Improvements to Kilmarnock train station underpass, and
- Environmental improvements delivered to Top of the Town and Green Street

3.3.6. **The CARS initiative has been a success** – The Conservation Area Regeneration Strategy has achieved substantial successes. Improvements have been made to three town centres:

- **Galston** town centre has seen £1.6M invested since 2013 to improve historic buildings and the Buck's Head, the Portland and the Principal Café have been refurbished internally and externally. The improvement of 19-23 Bridge Street was supported by £400,000 from the Vacant and Derelict Land Fund (VDLF).
- A number of prominent buildings have been refurbished in **Cumnock**, including the Royal Hotel, Dumfries Arms Hotel, the Mercat Hotel and the Logan's Solicitors building.
- Buildings on Bank Street, John Finnie Street and Portland Street in **Kilmarnock** have been improved through the CARS scheme and National Lottery funded Townscape Heritage Initiative. The Ingram Enterprise Centre on John Finnie Street opened in 2018. It offers serviced accommodation, meeting rooms, breakout spaces, and training facilities with a reception facility during core office hours.

FIGURE 11. OFFICIAL OPENING OF THE PORTLAND BUILDING DURING THE GALSTON CELEBRATION, JUNE 2018

SOURCE: EAC

3.3.7. **A CARS scheme for Mauchline was launched** – Historic Environment Scotland (HES) awarded funding for a Mauchline Conservation Area Regeneration Scheme (CARS) in April 2019. The

project was officially launched 22 October 2019 and 100 people attended the successful event. Engagement with the owners of buildings identified as priority projects has been ongoing to discuss availability of funding for building repairs and it is intended that significant improvements will be made to the village over a 5 year timeframe, commencing in 2020.

FIGURE 12. BURNS HOUSE MUSEUM – MAUCHLINE.

SOURCE: EAC

3.3.8. **More information on placemaking maps and the placemaking process can be seen here**

3.4. Places

3.4.1. Introduction - Identifying sites for housing and implementing policies aimed at managing the location, quantity and site specific requirements of housing developments is a key aim of the LDP. Monitoring has established the number of houses completed and the number programmed to be completed over the next fifteen years. Supporting our town centres is also critical and recent monitoring exercises have provided invaluable data relating to vacancy rates and quality of place.

FIGURE 13. NEWLY COMPLETED HOMES. ROTHESAY PLACE, KILMARNOCK

SOURCE: EAC

3.4.2. More houses are being built - The housing market in East Ayrshire is to some extent still affected by the global financial crisis of 2007–2008 and completions have yet to reach the numbers achieved before that time. Completions after 2012 remained small in number for several years and have only recently begun to show an increase. The Kilmarnock and Loudoun area has dominated completions since 2008 and accounted for around 90% of all houses built in 2018-2019. The number of completions is rising, however, and the northern part of the Council area appears to be increasingly attractive to house builders. Please note that the graph below refers to houses that formed part of applications for developments of four or more homes and that additional dwellings will also have been completed.

FIGURE 14. HOUSE COMPLETIONS PER FINANCIAL YEAR (2008 TO 2019) BY SUB HOUSING MARKET AREA
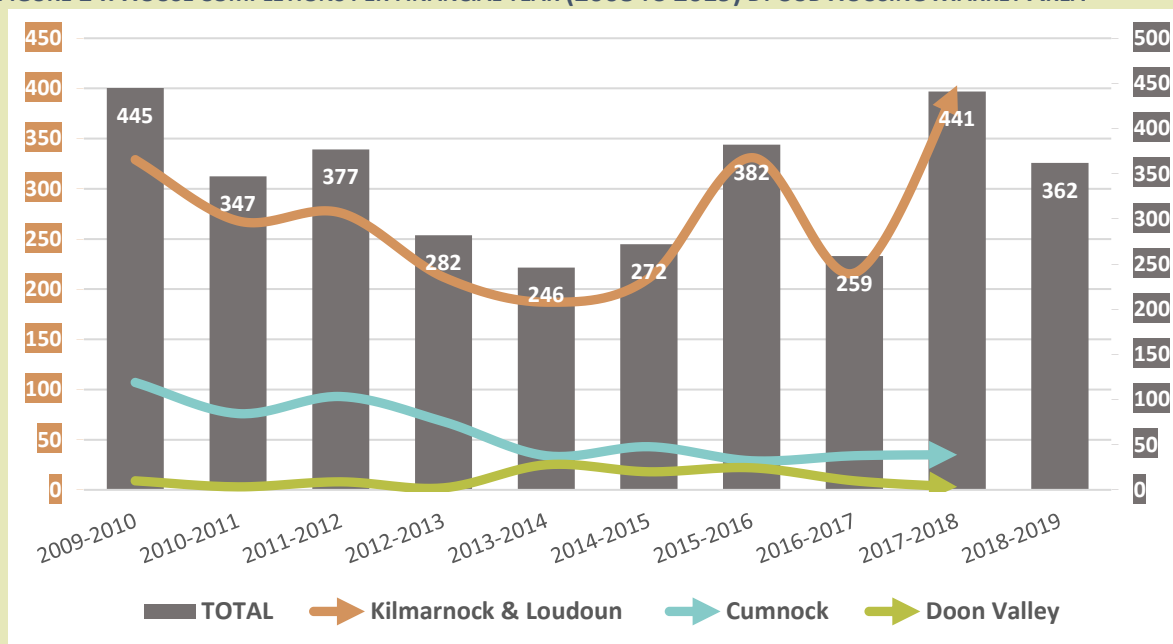
SOURCE: EAC MONITORING. A BREAKDOWN BY SUB-HMA NOT AVAILABLE FOR THE FINANCIAL YEAR 2018-2019.

3.4.3. **More people rent privately** - The private rental market in East Ayrshire has expanded in line with national trends over the monitoring period and concurrently with a reduction in the number of homes provided by the Council. The proportion of homes in such a tenure however remains lower (8%) than the Scottish average (14%).

FIGURE 15. PROPORTION OF UNITS BY TENURE (2018) EAST AYRSHIRE & SCOTLAND
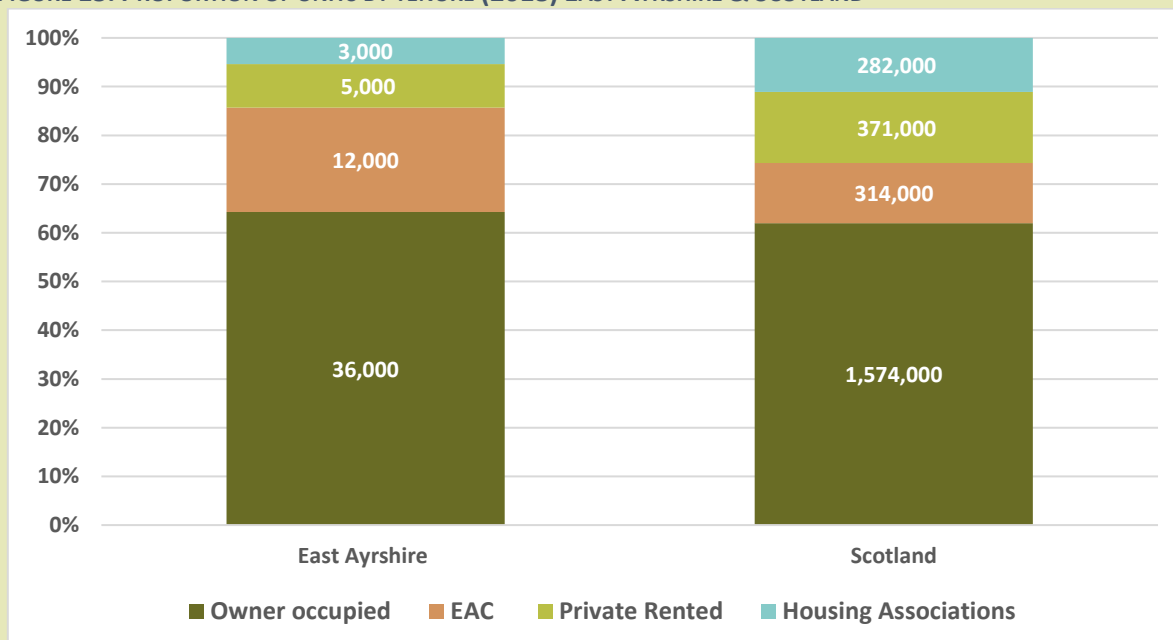
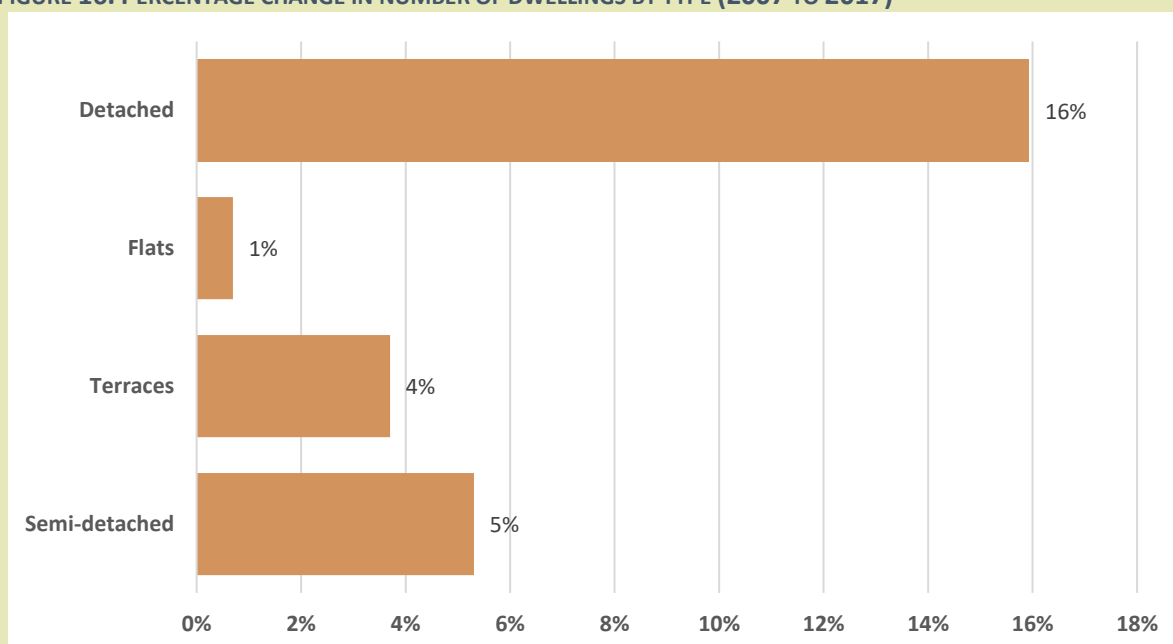SOURCE: SCOTTISH GOVERNMENT. ESTIMATE.

3.4.4. This can possibly be attributed to a lack of demand for homes rented for short periods, a feature more common in Scotland's cities. A greater proportion of rented homes are provided by the Council than the Scottish average as of 2018, alongside a similar proportion of owner occupied dwellings, which may also account for the disparity. Although from a low base,

growth in the private rented housing sector in East Ayrshire may mean that there are less properties are available for sale, with a consequent impact on affordability and entry to the housing market for first time buyers.

3.4.5. **Significantly more houses have been built than flats** - East Ayrshire presents a mixed picture in terms of its overall housing split, befitting its semi-rural nature. In contrast to more urban areas, a minority of dwellings are flatted. A very small increase in the number of flats was recorded 2007 and 2017, in marked contrast to a substantial growth in other dwelling types. This may be a consequence of the demolition of several flatted housing developments in recent years alongside the construction of some new blocks of flats.

FIGURE 16. PERCENTAGE CHANGE IN NUMBER OF DWELLINGS BY TYPE (2007 TO 2017)

SOURCE: SCOTTISH GOVERNMENT. NO CHANGE IN PROPORTION OF SEMI-DETACHED DWELLINGS RECORDED

3.4.6. **The number of vacant dwellings has increased** – The number of vacant and long term vacant homes in East Ayrshire has seen a year-on-year increase, in line with a similar increase Scotland-wide. 3.7% of dwellings were vacant in 2018, higher than a 3.2% Scottish average.

FIGURE 17. NUMBER OF VACANT AND LONG TERM VACANT DWELLINGS IN EAST AYRSHIRE (2009 TO 2018)

SOURCE: NATIONAL RECORDS OF SCOTLAND. LONG TERM VACANT - PROPERTIES THAT ARE UNFURNISHED AND UNOCCUPIED FOR MORE THAN SIX MONTHS. FOR MORE INFORMATION PLEASE CONTACT NRS.

3.4.7. **There are a greater number of homes but smaller households** – More people are living alone than ever before (Scottish Household Survey). The total population of East Ayrshire has been relatively stable during recent years yet there are now less inhabitants per dwelling.

FIGURE 18. NUMBER OF DWELLINGS AND HOUSEHOLD SIZE (2009 TO 2018)
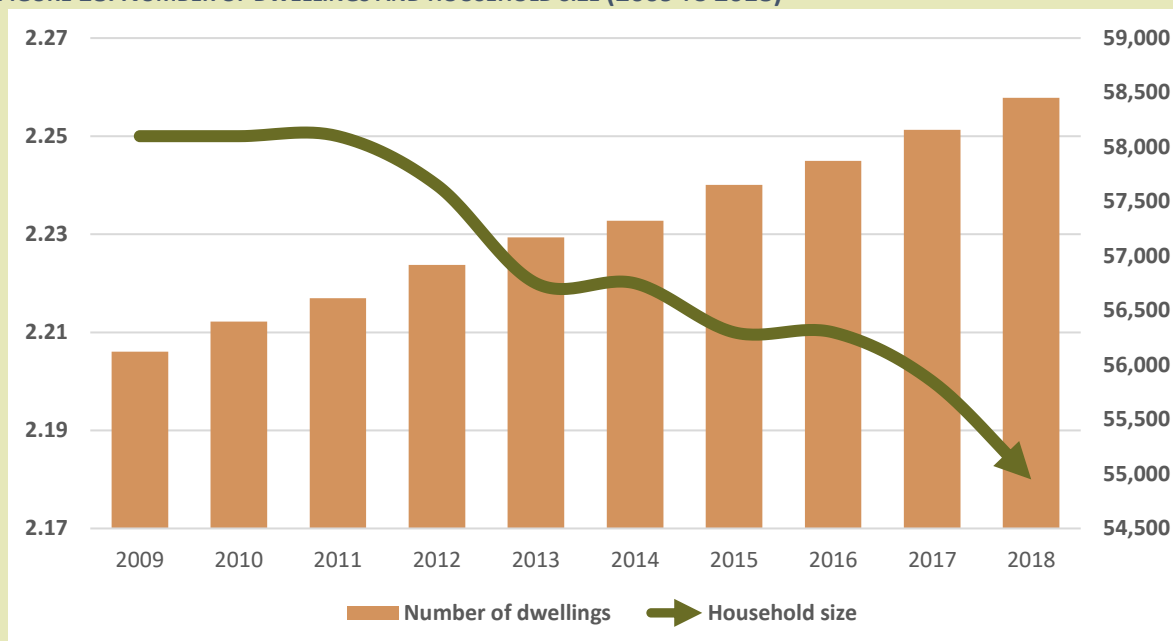
SOURCE: NATIONAL RECORDS OF SCOTLAND

3.4.8. Aside from an increase in demand for new homes, the trend towards smaller households is likely to have an impact on existing housing stock as a large number of dwellings become under occupied. The requirement for a greater proportion of smaller, more affordable housing (purchase price and running costs), and housing catering for older people, may increase in the

future. Given these likely requirements, it is surprising to note that the number of flats, arguably the most appropriate type of accommodation for single person households, has remained relatively stable in recent years.

3.4.9. **House prices remain lower than the national average** – House prices in East Ayrshire remain slightly lower than they were before the 2008 downturn and have not kept pace with the Scottish average. Furthermore, whilst the average price in Scotland is now higher than it was in 2008, the price in East Ayrshire remains substantially lower and a widening gap with the national average has opened.

FIGURE 19. AVERAGE PRICE OF DWELLINGS IN EAST AYRSHIRE AND SCOTLAND (2010 TO 2019)
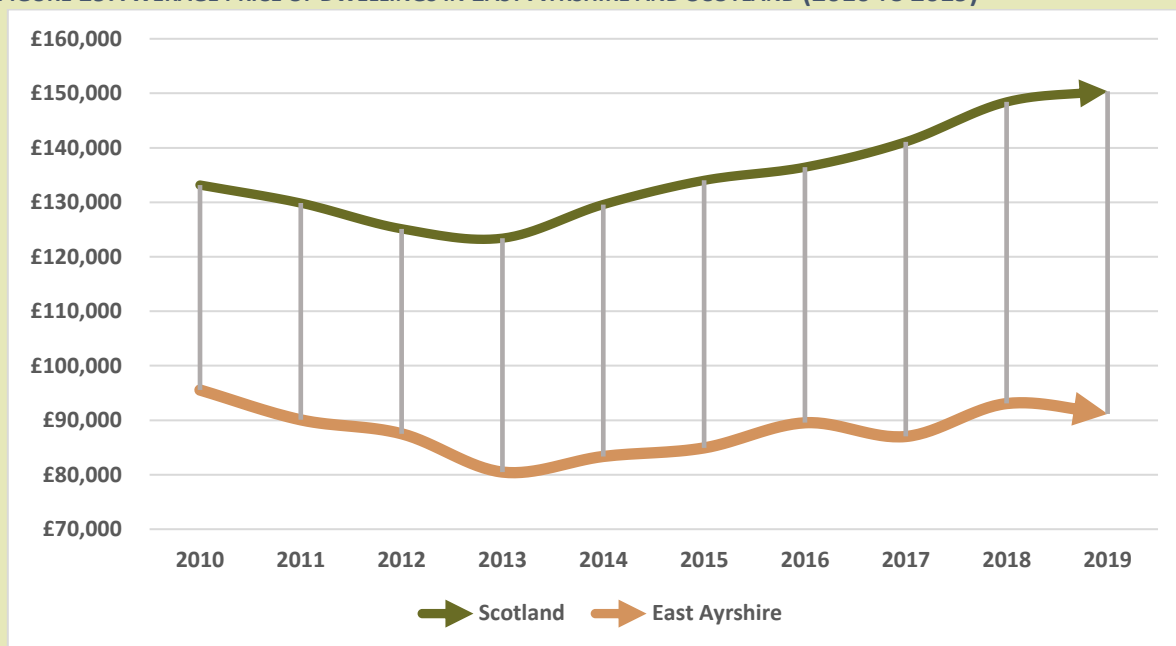
SOURCE: UK HOUSE PRICE INDEX. PRICES AT APRIL EACH YEAR.

3.4.10. Cheaper prices may prove to be a draw for first time buyers but a low rate suggests that adverse economic conditions prevailing in East Ayrshire are having an effect upon the desirability of new homes. Housing has become progressively more affordable for those living and working in East Ayrshire since 2008, however, the initiatives proposed by the Ayrshire Growth Deal (AGD) may act to stimulate a long term increase in house completions and prices.

FIGURE 20. AFFORDABILITY OF HOUSING IN EAST AYRSHIRE (2010 TO 2019)

3.4.11. **East Ayrshire's town centres face challenges** – A Town Centre Health Check undertaken in summer 2019 reveals that the number of vacant non-residential ground floor units has risen by 5% since 2016 across the 5 East Ayrshire town centres that were monitored. Cumnock has witnessed a significant fall in vacancy rates influenced by a reduction in the total number of units as a result of the demolition of the Glaisnock Centre in 2017. Kilmarnock on the other hand has seen a substantial increase in unit vacancy from 14.6% of all units to 17.3%.

FIGURE 21. CHANGE IN AREA OF VACANT RETAIL FLOOR SPACE PER TOWN CENTRE (2016 TO 2019)
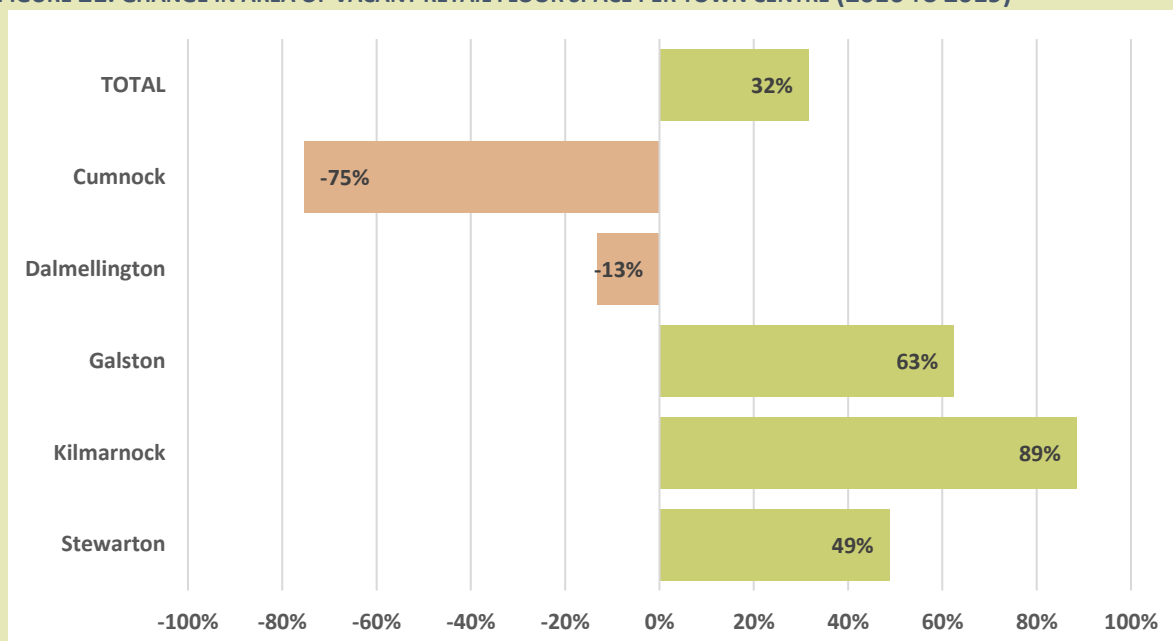
FIGURE 22. BANK STREET, KILMARNOCK

SOURCE: EAC

3.4.12. **Quality of place varies from centre to centre** – Qualitative scores were generated for each town as part of the health check. Factors included ease of movement, distinctiveness and a number of other criteria. Kilmarnock performed well due to good accessibility and public art, Cumnock scored well because of the strong sense of place at the Square and Galston received a higher score than some of the centres because of a good sense of place. Dalmellington performed less well due to a sense that the town is somewhat neglected in places.

FIGURE 23. TOTAL QUALITATIVE SCORES BY TOWN CENTRE (2019) - % OF MAX SCORE (190)
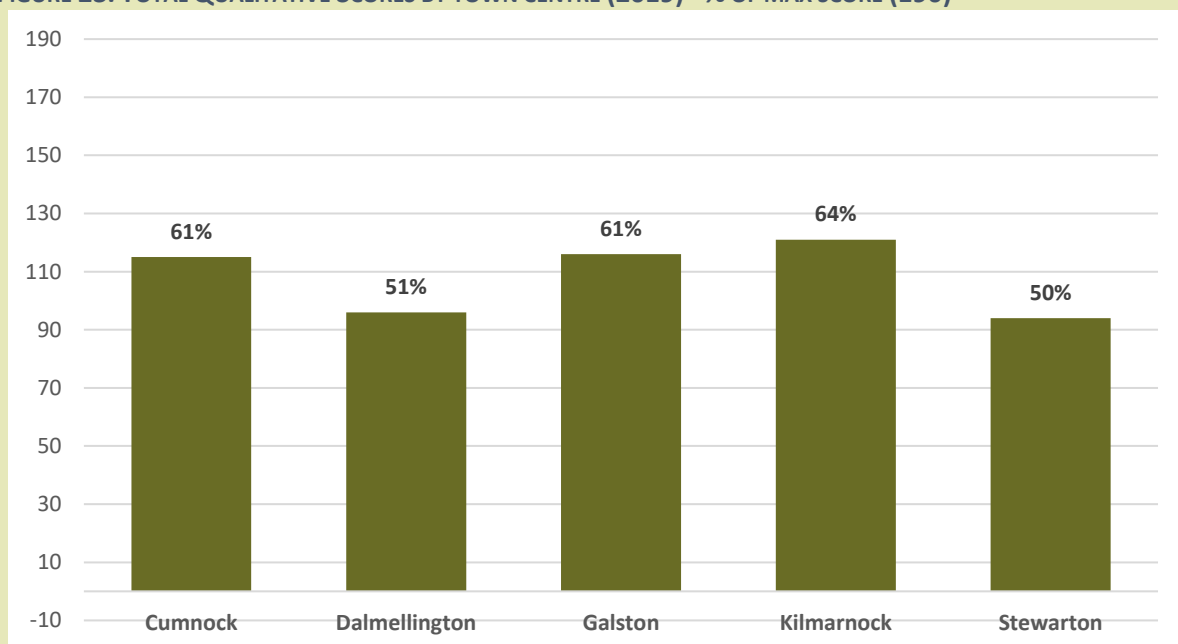
SOURCE: EAC MONITORING. IN PERCENTAGES OF TOTAL MAX SCORE – 190.

3.4.13. **The Council has invested in new shopping facilities** – The Glaisnock Centre redevelopment in Cumnock town centre was undertaken by East Ayrshire Council. Demolition on the old centre took place in late 2016 and the new facility opened in late 2018. The new centre provides seven high quality retail units, the largest one of which has already been taken up by Farmfoods, as well as new car parking for an additional 60 cars.

FIGURE 24. THE NEW GLAISNOCK CENTRE IN CUMNOCK – SUMMER 2019

SOURCE: EAC

3.5. Economy

3.5.1. **Introduction** – The economy of East Ayrshire has performed less well than the Scottish average for many years. Levels of deprivation are higher, there are less jobs per inhabitant, less people are employed to higher wage levels and more people are out of work. There are signs of improvement however. The employment rate has risen and more people are employed in the tourism sector than was the case in 2012. Scottish Index of Multiple Deprivation (SIMD) figures released in early 2020 reveal a relative reduction in average deprivation compared to the situation in 2016.

FIGURE 25. CONSTRUCTION BEGINS ON NEW BUSINESS/INDUSTRIAL UNITS AT MOORFIELD INDUSTRIAL ESTATE

Source: EAC

3.5.2. **The area is economically disadvantaged relative to the national average** - East Ayrshire is socioeconomically disadvantaged compared to the Scottish average. It had the second highest unemployment rate (16-64) in Scotland as of July 2018-June 2019 at 5.9%, with only the city of Dundee (6.4%) having more people looking for work (ONS)*. Although the number of people working in East Ayrshire has increased since 2016 after falling sharply the preceding year, a wide divergence has over time opened up between the area and Scotland as a whole. East Ayrshire experiences relative geographical isolation combined with, amongst other factors, a legacy of unemployment associated with the winding-down of the deep mining industry in the late 20th century and the closure over a protracted period of large factories in Kilmarnock and other settlements.

FIGURE 26. EMPLOYMENT RATE (2012 TO 2019) IN %
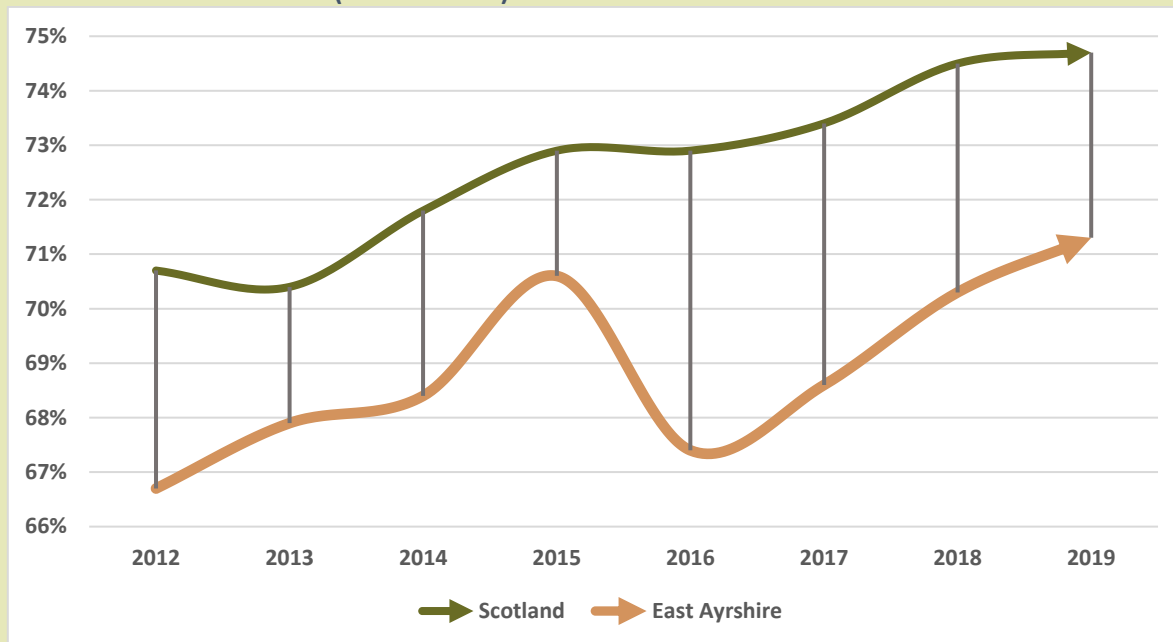
Refers to people without a job who were available to start work in the two weeks following their interview and who had either looked for work in the four weeks prior to interview or were waiting to start a job they had already obtained.

3.5.3. **The level of economic inactivity has remained consistent** – Slightly less people in East Ayrshire between the ages of 16-64 were classed as economically inactive in 2019 as in 2010, however, the proportion of those inactive was greater than that of Scotland as a whole in both of those years and during the majority of the time period. Economic inactivity is defined as 'people not in employment who have not been seeking work within the last 4 weeks and/or are unable to start work within the next 2 weeks' (ONS) – there is therefore a distinction between this rate and the employment/unemployment rate.

FIGURE 27. TOTAL ECONOMIC INACTIVITY (2012 TO 2019) IN %
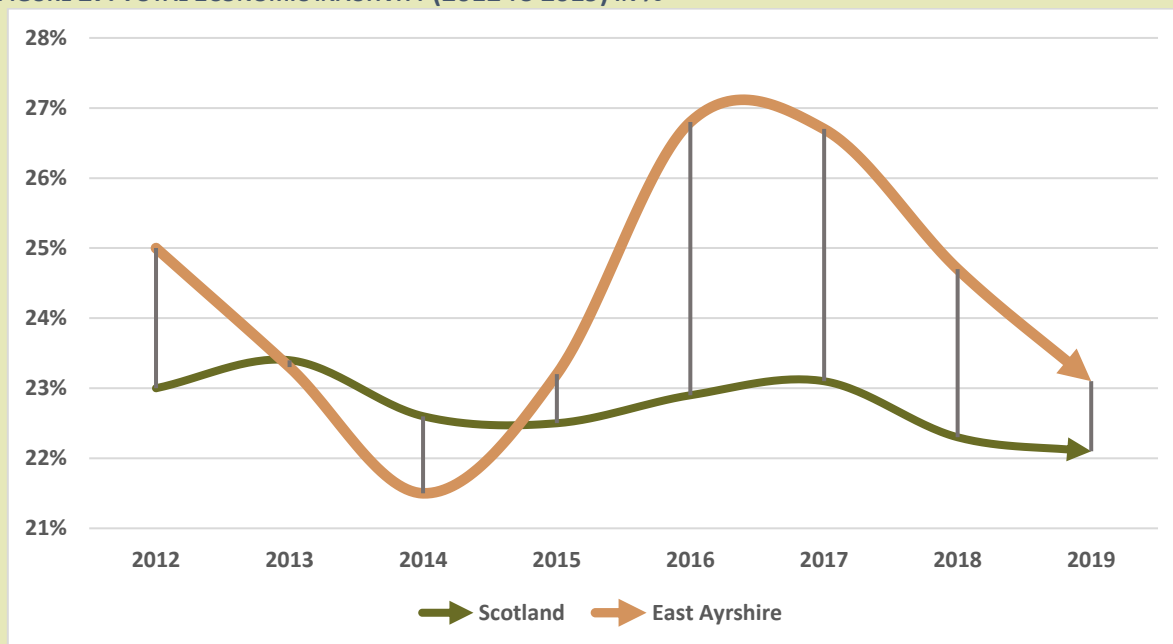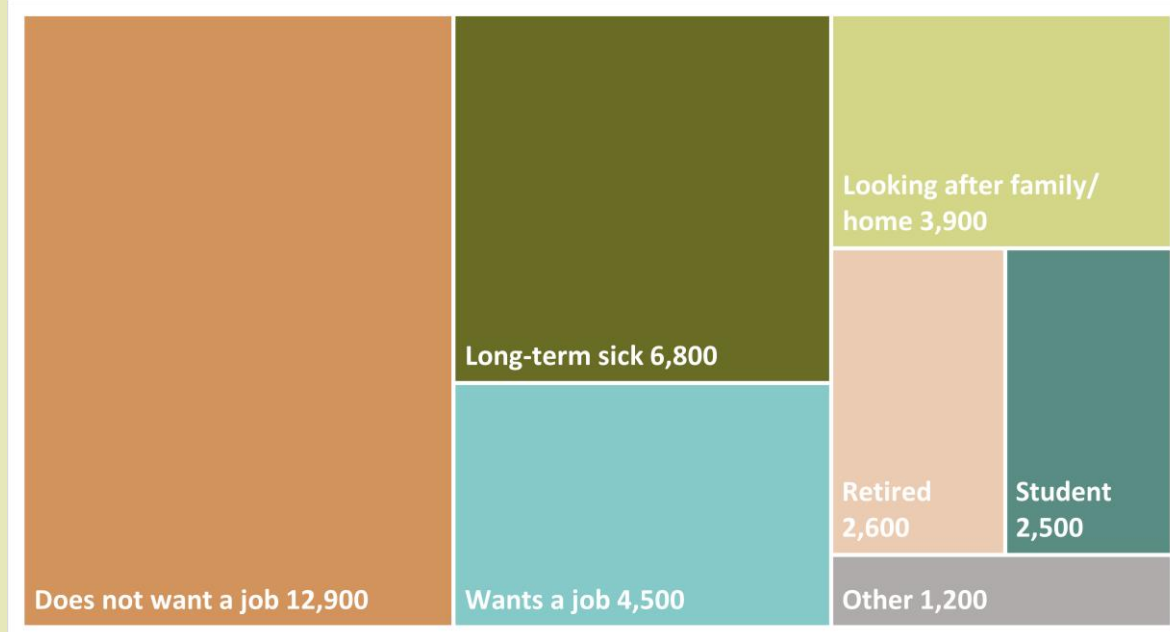
3.5.4. **East Ayrshire has seen a relative reduction in deprivation** - The SIMD is a relative measure of deprivation employed as a means of assessing living conditions in 6976 Datazones of around 800 inhabitants relative to all other Datazones in Scotland. The SIMD assesses the extent to which an area is deprived against 8 indicators: income, employment, education, health, access to services, crime and housing. Datazone S01007963 in the Shortlees area of south Kilmarnock had the lowest ranking or most deprived rate of any in East Ayrshire at 18, a fall of 26 since 2016. Five Datazones in East Ayrshire had ranks of less than 100. 31% of Datazones in East Ayrshire fall within those classed amongst the 20% most deprived in Scotland according to the 2020 SIMD; a greater proportion was recorded in 6 of 31 other Local Authorities.

3.5.5. East Ayrshire is on average relatively less deprived than was the case in 2016, however, access to services has experienced a reduction in rank from 2963 to 2601 in 2020. This shift may have come as a result of the inclusion of access to broadband as an indicator in 2020; much of the area is rural and a number of homes have yet to be enabled to connect through the DSSB and R100 broadband programmes but are expected to do so in the coming years.

FIGURE 29. PERCENTAGE CHANGE IN AVERAGE EAST AYRSHIRE SIMD DATAZONE RANK (2016 & 2020)

SIMD	0.4%
Income	1.4%
Employment	5.8%
Health	3.1%
Education	0.7%
Access	-12.2%
Crime	4.2%
Housing	0.1%
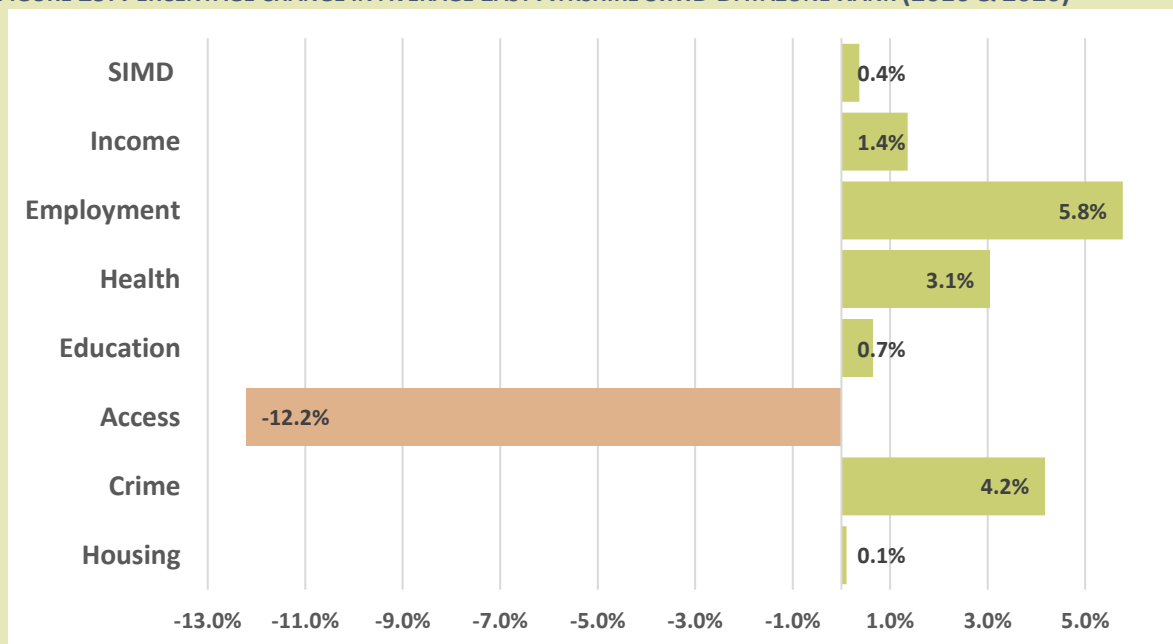
SOURCE: SIMD 2016 & 2020 - SCOTTISH GOVERNMENT. INCREASE REPRESENTS IMPROVEMENT ON 2016 FIGS.

3.5.6. **Pay is higher than the Scottish average but many commute elsewhere** – The difference between the less positive socioeconomic statistics presented in the preceding sections and the figure below suggests an interesting situation whereby those that live in East Ayrshire are on average more deprived than their average Scottish counterparts yet those full time workers that are resident on average earn more and have done so for several years.

FIGURE 30. GROSS WEEKLY PAY OF FULL TIME WORKERS (2012 TO 2019)
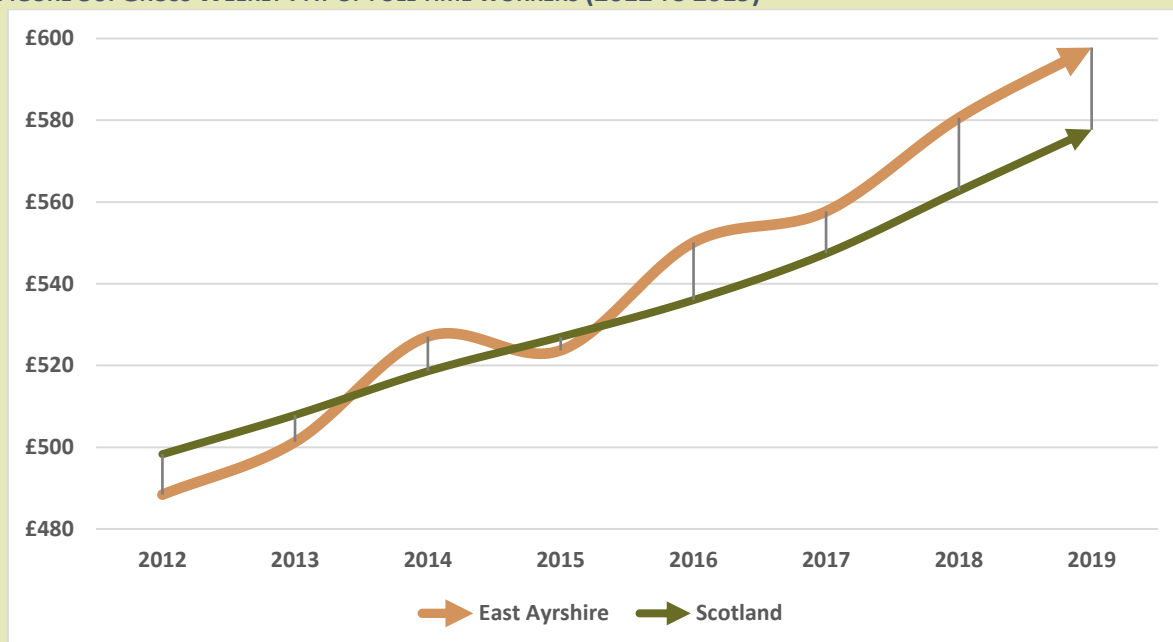
SOURCE: OFFICE FOR NATIONAL STATISTICS (ONS)

3.5.7. Whilst the difference between East Ayrshire and Scotland in terms of pay is slight in a holistic sense, this positive figure nevertheless suggests that a substantial number of people in the area commute to jobs elsewhere. This assumption is supported when considered alongside

jobs density figures which highlight a negative difference between East Ayrshire and Scotland as a whole in terms of the number of jobs in the Local Authority area per resident.

FIGURE 31. JOBS DENSITY IN EAST AYRSHIRE AND SCOTLAND (2012 TO 2017)

3.5.8. **Employment type primarily falls within medium skilled groupings** – More people in employment in East Ayrshire fall within ONS Major Groups 4 to 7 than the Scottish average. This grouping includes administrative and secretarial, skilled trade, caring, leisure, sales and customer service occupations. By contrast, proportionally less people with professional/technical occupations are resident in the area than the Scottish average, a consequence perhaps of the isolation of some communities from major employment centres.

FIGURE 32. EMPLOYMENT BY OCCUPATION GROUPING (APRIL 2018 TO MARCH 2019)

3.5.9. Tourism infrastructure has received investment - Dean Castle Country Park reopened in 2018 after undergoing major redevelopment work; £4m of Heritage Lottery Funding (HLF) from the 'Parks for People' fund allowed the park to be restored appearing as it would have in the early 1900s. Further funding from the HLF will redevelop the interior of the castle and open up areas which are not currently accessible to the public. Two new exhibition areas will be created on the ground floor and it is intended that the Courtyard will become a hub for activities and orientation.

3.5.10. The recently adopted MLDP provides protection to the tourism sector – The Minerals Local Development Plan (MLDP) 2020 provides some security to the tourism sector by means of policies that ensure that mineral extraction does not adversely impact on tourism resources and facilities. It also provides policy support for tourism activities on former mineral opportunity sites, with various caveats.

3.5.11. More people are employed in the tourism sector - The tourist trade represents an important element of the East Ayrshire economy. Employment in tourism accounted for around 8% of jobs in East Ayrshire in 2017 and the area experienced a 19% increase in employment in the tourism sector between 2012 and 2017 (Scottish Government Growth Sector Statistics - October 2018), albeit with a broad fluctuation of around 600 jobs between 2014 and 2016.

FIGURE 33. EMPLOYMENT IN THE EAST AYRSHIRE TOURISM SECTOR (2012-2017)

SOURCE: SCOTTISH GOVERNMENT. ADDITIONAL PAYE BASED ONLY UNITS FROM 2015 ONWARD

3.6. Energy & Infrastructure

3.6.1. **Introduction** – Improvements to infrastructure have continued apace and a high interest in the development of wind farms makes East Ayrshire one of Scotland's key areas of renewable electricity generation. More waste is recycled in East Ayrshire than the Scottish Local Authority average and the percentage has been rising for many years. More remains to be done, however, including improvements to the road network around Kilmarnock and pressure to meet national recycling targets.

FIGURE 34. WIND TURBINE TOWER DELIVERED TO SITE AND BEFORE ASSEMBLY

SOURCE: EAC

3.6.2. **Wind farm development has taken place** – Generating electricity using wind power is now a mainstream business and recent developments produce a greater amount of electricity from less turbines than was previously the case. Approvals of wind farm developments have fluctuated in number and there have been peaks and troughs in the number of approvals for several years. That being said, when approved the number of turbines has been high and each new development has helped the country to meet its climate change targets. Applications for additional developments have recently been submitted and it is likely that there will be more spikes in consents in the coming years.
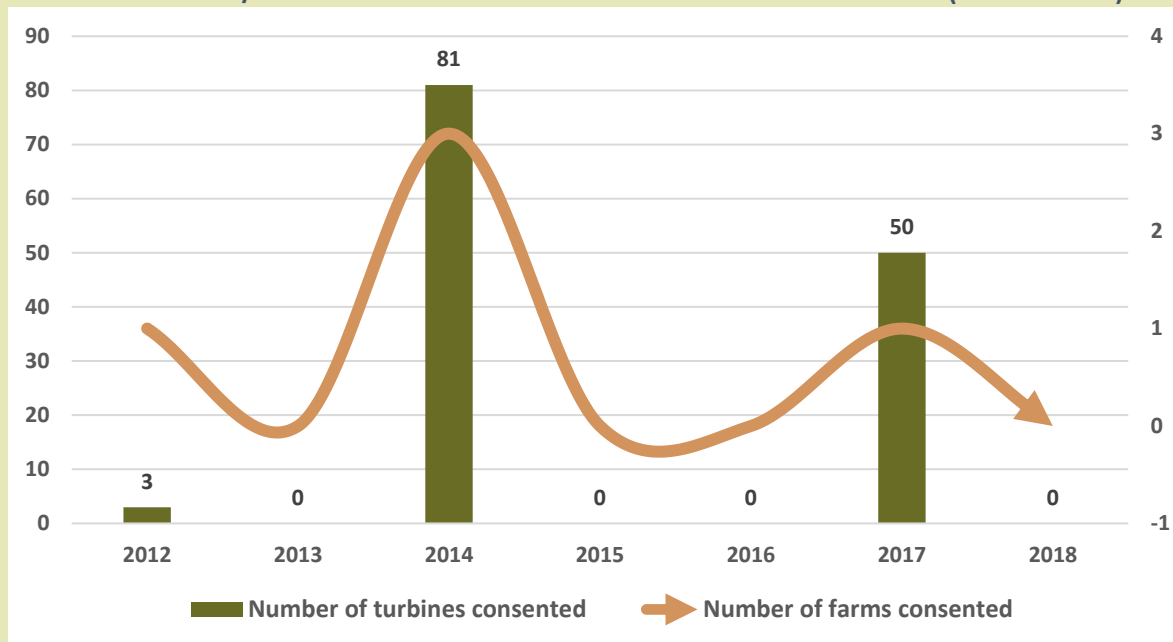
SOURCE: EAC MONITORING. 'WIND FARM' REFERS TO WIND POWER DEVELOPMENTS OF THREE TURBINES OR MORE.

FIGURE 36. CONSTRUCTION OF A WIND TURBINE FOUNDATION

SOURCE: EAC

3.6.3. **Water power has been harnessed** - The Catrine Environmental Heritage Project has successfully conserved historic Catrine Weir and Voes System, a Scheduled Ancient Monument, to a structurally sound condition including the and reuse and renovation of historic turbines and water system to develop a money generating hydro-electricity scheme.

The project was completed in 2015 and generated £100,000 per year for the local community as of 2019.

3.6.4. **Electricity connections are being improved** – The South West Scotland Connections Project by SP Energy Networks aims to harness electricity generation at wind farms in the south of the area through the construction of a new high capacity transmission system of overhead electricity lines connecting the Coylton substation in South Ayrshire with a new substation in Dalmellington. Work on an underground cable running between Black Hill substation and the Pencloe wind farm, both in East Ayrshire, will be completed 2020.

3.6.5. **More household waste is being recycled** - The quantity of household waste that is recycled in East Ayrshire steadily increased up to 2016 but has fallen in recent years, alongside a similar nationwide reduction. The average recycling rate by Local Authorities in Scotland in 2018 was 44.7%. East Ayrshire is therefore outperforming a number of other Local Authorities as well as the national average and has done so for a number of years. The total amount recycled has dipped in recent years, however, and much remains to be achieved both in East Ayrshire and nationally to meet the Scottish Government's target of 70% of waste being recycled by 2025.

FIGURE 37. PERCENTAGE OF HOUSEHOLD WASTE RECYCLED OR COMPOSTED (2012 TO 2018) EAC/SCOTLAND LAs
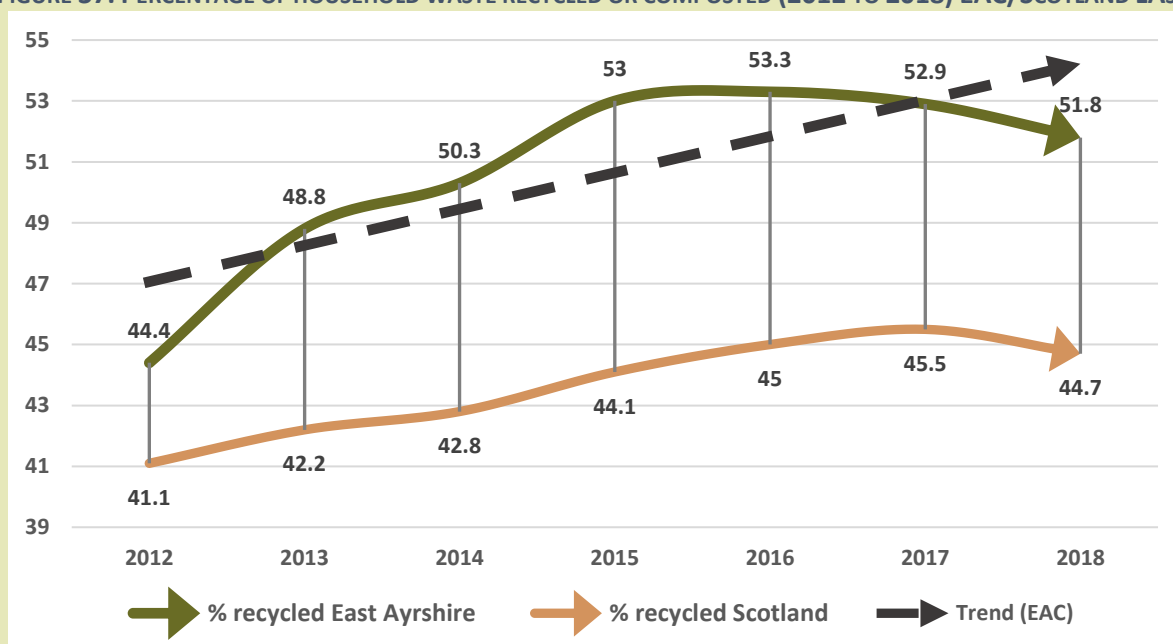
SOURCE: SCOTTISH ENVIRONMENT PROTECTION AGENCY (SEPA)

3.6.6. **The road network has been upgraded but continues to face problems** – A realignment of the A70 at Glenbuck was completed in June 2019 and includes a new bridge over the River Ayr. This important link to the M74 has been a longstanding problem and the upgrade has achieved much in improving connectivity to and from the area. A study is currently being undertaken to identify improvements that may be made to improve the Bellfield Interchange.

3.7. Environment

3.7.1. Introduction – The environment in East Ayrshire has undergone substantial change in recent years. The closure of opencast mines has left a legacy of unrestored land, however, much has been achieved in remediating these sites and the proportion of vacant land in Scotland found in East Ayrshire has been gradually reducing. The Coalfield Environment Initiative (CEI) has undertaken environmental improvement works including wetland and bog enhancement. There are less listed buildings at risk than before and restoration has continued to save historic structures.

3.7.2. The area of vacant and derelict land is reducing in size - The total area of derelict and urban vacant land in East Ayrshire increased significantly with the demise of Scottish Coal and ATH Resources, rising by 631% from 351ha in 2013 to 2,553ha in 2013/2014. Despite year-on-year reductions since that time, East Ayrshire nevertheless had the largest area of recorded derelict and vacant land in Scotland in 2017 with 2,401ha or 21% of the Scottish total. Less people in East Ayrshire lived within 500m of derelict land in 2018 than in 2012, however, and the 2018 figure is lower than the national average of 29%, despite the aforementioned significant area of derelict and vacant urban land recorded for East Ayrshire. This reduction has been achieved in part through an effort on the part of the Council to reduce the area of vacant and derelict land through the remediation of former opencast sites and the reuse of vacant land for homes.

FIGURE 38. VACANT AND DERELICT LAND IN EAST AYRSHIRE AND SCOTLAND (2012 TO 2018) IN HECTARES
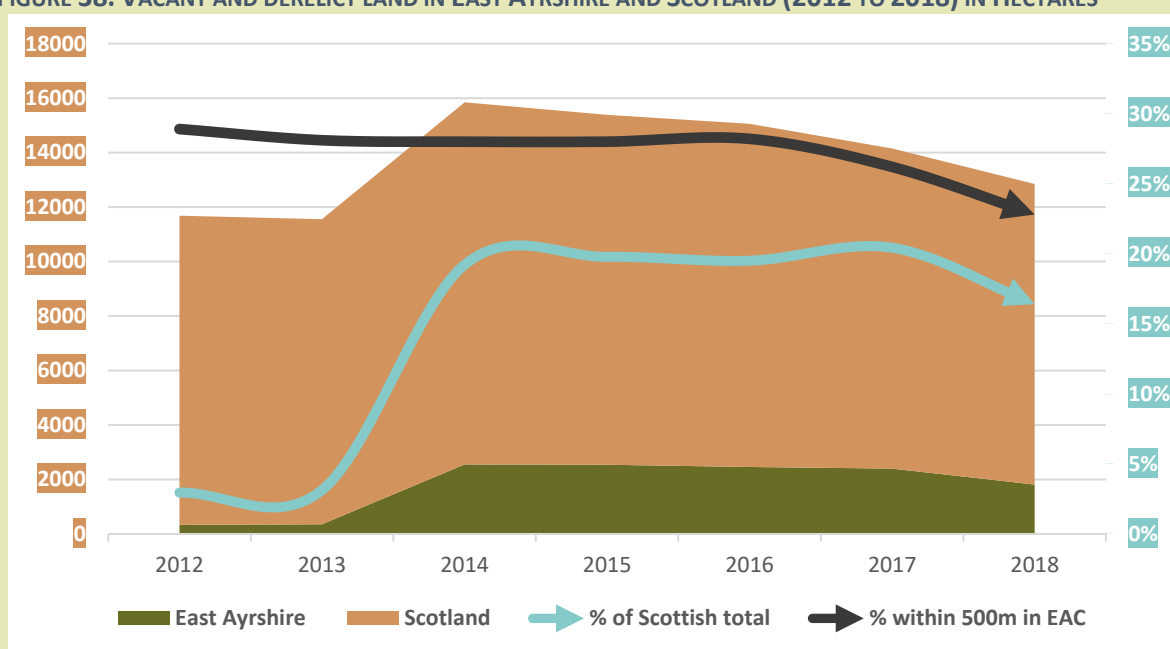
SOURCE: SCOTTISH GOVERNMENT/SVDLS. AREA OF VACANT LAND IN EAST AYRSHIRE COMPARED TO THE SCOTTISH TOTAL. FIGURE FOR **2019** WAS **1820**HA, AN INCREASE OF **10**HA OR **0.6%** FROM THE PREVIOUS YEAR.

3.7.3. The CEI has achieved progress – The East Ayrshire Coalfield Environment Initiative (CEI) is a partnership between East Ayrshire Council and conservation bodies and aims to enhance, conserve and promote the environment of East Ayrshire. It has achieved substantial success since it was established, including new access and habitat networks for Cumnock, the Wetland Enhancement Project and a number of other initiatives. 479 hectares of bog enhancement work across six sites had been completed by the CEI by the end of 2018.

3.7.4. **The CCLP has been established** – The Coalfield Communities Landscape Partnership is a grouping of partners including East Ayrshire Council, Central Scotland Green Network, Forestry Enterprise Scotland, East Ayrshire Leisure Trust and others. It aims to connect local people with their heritage, equip people with skills to manage the landscape sustainably, address threats to natural, built and cultural heritage and create opportunities for learning, recreation and wellbeing.

3.7.5. In March 2020, the CCLP received confirmation that it had been successful in its stage 2 application to the National Lottery Heritage Fund, securing approximately £2.2million to deliver the scheme over a 5 year period. Together with significant match funding the total project will result in a £6 million scheme delivering 22 varied and exciting community led projects that will reconnect communities with their landscape and heritage.

3.7.6. **There are fewer HES-identified buildings at risk** – Historic Environment Scotland's (HES) Buildings at Risk Register, which catalogues listed buildings in a state of disrepair, recorded 47 buildings in East Ayrshire as being at risk as of July 2019, down from 56 in 2015 and 68 in February 2010. This reduction included several buildings redeveloped by the CARS scheme that were removed from the register. 4 listed buildings on the list were under restoration as of July 2019, the same number as 2015 and 2010.

FIGURE 39. BUILDINGS AT RISK (2010, 2015 & 2019)
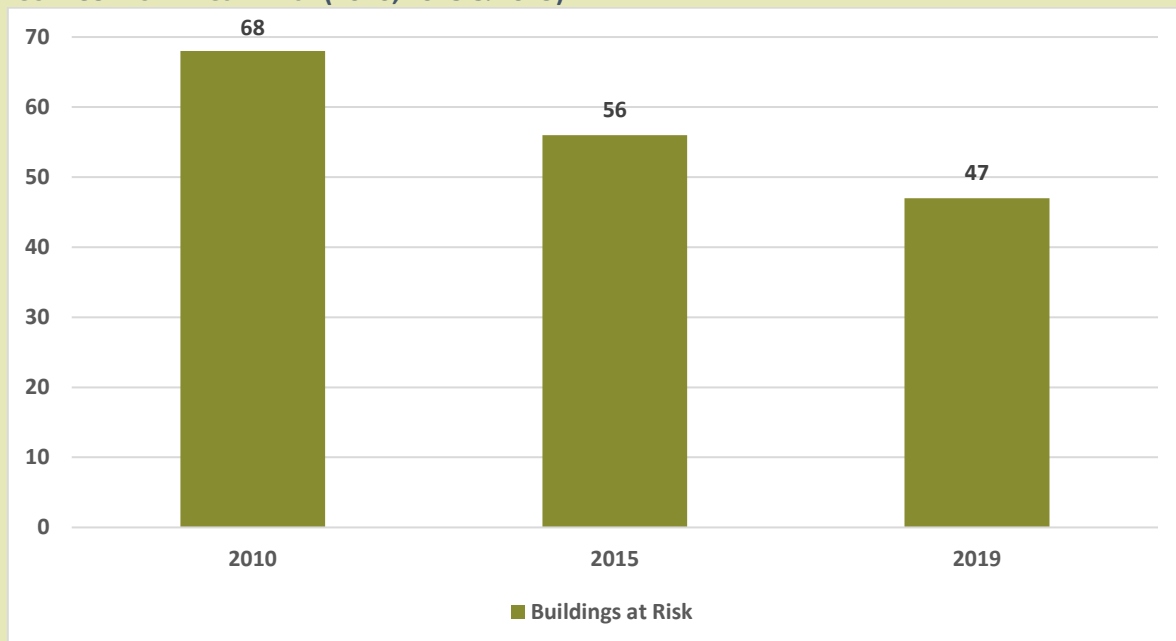
SOURCE: EAC HISTORIC ENVIRONMENT SCOTLAND (HES)

4. Impact

This section will outline the impact that the strategies and policies of the 2017 Local Development Plan have had since its adoption. The headings of each section/subsection of the LDP have been employed to provide a structure against which an assessment can be made. An assessment at the foot of each section makes a judgement on the success of the overall aims of each topic and details any emerging main issues. If necessary, a statement on the impact of an individual policy has been made if it is considered that it has had a sufficient influence on the overall aims of the Plan.

Is the East Ayrshire Local Development Plan achieving its aims?

Relatively few years have passed since the LDP was adopted. A long term perspective is taken by the Plan and it is recognised that numerous years must pass before a true assessment can be made. Nevertheless, as close a judgement as possible of the strengths and weaknesses of the LDP and its achievements has been made, in order to best inform the MIR. In some cases, an assessment of applications in the years leading up to the adoption of the LDP and since the last MS was published in 2012 has been made to provide context.

FIGURE 40. NEW HOMES UNDER CONSTRUCTION

SOURCE: EAC

4.1. Vision and Spatial Strategy

'East Ayrshire is a place with strong, safe and vibrant communities where everyone has a good quality of life an access to opportunities, choices and high quality services which are sustainable, accessible and meet people's needs' - LDP

Has the LDP achieved its Spatial Strategy?

4.1.1. **Introduction** – The LDP vision looks forward 20 years and sets out how East Ayrshire will be in the future if the proposals contained in the LDP, as well as the Community Plan and all other Council strategies, are carried through successfully. In line with the requirements of Scottish Planning Policy (SPP), the LDP spatial strategy recognises where most pressure for development lies and also makes provision for growth and regeneration across the whole Council area. This LDP makes it clear that East Ayrshire will be a stronger, more vibrant and diverse economic growth area which is recognised as a place that supports innovation and growing companies.

4.1.2. **Defined settlements will accommodate most new development** – The majority of housing developments programmed to take place within the settlement boundaries outlined in the LDP. Kilmarnock itself has been the location of much of this development to date and will continue to be the focus of growth in the years ahead. Brownfield land within these housing developments is to accommodate around half of all developments over the next five years, a demonstration that the allocations in the LDP have encouraged development of previously used land. Business, industrial and commercial development has also been successfully encouraged to locate in settlements and most new uses of this kind have been directed towards business and industrial allocations and town centres.

4.1.3. **Development has largely been directed towards areas capable of growth** – Housing development has predominantly taken place in and around Kilmarnock, suitable given its strong transport links. The approach has been less successful in the case of Stewarton as the large housing allocations in the town have put pressure on the road network, sewerage capacity and local public services. It is intended that LDP2 will identify a number of means by which pressure on the town could be alleviated whilst also allowing it to thrive.

4.1.4. **Some housing allocations are isolated and inaccessible** – The Spatial Strategy makes a commitment to direct development to accessible locations to reduce the overall need to travel. A number of developments have been approved in areas that are not accessible by various modes of transport, however, and certain allocations in the LDP are themselves isolated and likely to force residents to rely on the car. This problem is most acute in the south of the area in settlements like Burnside, Hayhill, Sinclairston and a number of other very small settlements. Travel to these locations by bus is for example possible but their small size means that services are often infrequent. Some of these allocations have been built out, but the suggestion on the part of the Council that they represent suitable locations to develop housing has in some cases encouraged builders to further expand those small settlements. Within LDP2, the ongoing sustainability of these settlements and sites will need to be balanced against the Planning (Scotland) Act 2019 aim of repopulating rural areas.

4.1.5. **The Core Area (Kilmarnock and surrounds) remains the location for major development** – Around 90% of all housing development has taken place within the Kilmarnock and Loudoun Sub Housing Market Area and is projected to continue to do so over the next fifteen years. Commercial and industrial development has also taken place predominantly in the area and there remains scope for substantial additional investment associated with the Ayrshire Growth Deal (AGD), much of the spatial focus of which will be around the Moorfield and Bellfield areas of Kilmarnock.

4.1.6. Kilmarnock town centre has however performed less well and has the highest unit vacancy rate (17.3%) for a number of years. The area to the South of the Galleon Centre, South Central Kilmarnock, is underdeveloped with numerous gap sites and an incoherent built environment, yet has the potential to be transformed into a new urban district. It is hoped that the AGD will stimulate investment in order to tackle these longstanding issues. The area to the north of Kilmarnock has been mooted as a location for future growth alongside Bellfield and Moorfield to meet housing and business demand and South Central Kilmarnock has been suggested for potential redevelopment. The MIR will further explore this potential approach.

4.1.7. **The Cumnock Area has seen improvements** – The Glaisnock Centre redevelopment has significantly improved the appearance and function of Cumnock town centre and has achieved a 28% reduction in the number of vacant units in the town centre. The Cumnock CARS scheme also achieved substantial improvements to a number of historic buildings. Development at Knockroon has not taken place as expected, however, and only around 30 units of over 700 planned have been built to date. It is however hoped that large-scale development there will resume, in part as a result of the opening of the Council's new and state of the art Barony school campus. Development at Caponacre has been restrained and there are signs that some plots may be of interest to house builders. Development at Dumfries House has continued apace.

4.1.8. **The Northern Area has come under pressure** – Demand for development in the Northern Area has put pressure on Stewarton in particular. Whilst the town centre retains a healthy level of occupancy and a range of shops, development of housing has put education and medical services under pressure and led to congestion on the road network at peak times. Demand for development in Fenwick has been better accommodated and there remains scope to deliver additional housing in a sustainable manner.

4.1.9. **The Doon Valley continues to face challenges** – Dalmellington town centre has a high level of unit vacancy and there is little evidence that it is establishing itself as a tourist centre. The Biosphere and Dark Sky Park have however been successfully established and the Scottish Dark Sky Observatory has achieved good tourist reviews. Development of homes has not taken place as expected, however, and only 19 homes are programmed to be completed in the Doon Valley Sub HMA over the five years 2019 to 2024 (of developments of four or more units).

4.1.10. **Development in the Irvine Valley has been restrained** – Tourism development has taken place; an application to expand the Newmilns ski slope has been approved, however, a proposed development at Loudoun Castle was refused after a lengthy Public Local Inquiry, essentially as a result of the considerable number of new houses proposed to support the project. Development of new homes in the Irvine Valley is expected to take place at a low rate and only 56 are programmed to be completed over the five years 2019 to 2024 of a remaining housing capacity of 237 as of 1st April 2019. The redevelopment of Galston town centre through the CARS initiative has taken place, however, and yielded positive results.

4.1.11. **The Rural Area has seen development of variable suitability** – There has been substantial pressure for wind farm development, particularly in the south of the Council area, however, each application has been carefully assessed and the planning service has taken a proactive approach that weighs up the costs and benefits of each proposal in order to reach a policy position. It is the case, however, that considerable development of housing has taken place in parts of the Rural Protection Area (RPA) and a review of this policy will take place as part of the preparation of LDP2, possibly including an expansion if its boundaries.

4.1.12. **Most non-housing and non-civic development has taken place within settlement boundaries** – The EALDP states that 'All new development requirements can be met within, or on the edge of, existing settlements meaning no new settlements are needed.' For the purposes of this analysis, non-housing/civic developments (schools, community centres or developments, etc.) include assembly, leisure and recreation, business, financial, professional and other services, food, drink and pubs, general industry, takeaway and retail. A majority of these types of development have taken place within the settlement boundaries defined in the 2017 LDP and a significant proportion of those that have not have been of an agribusiness, or rural area-specific nature not capable of accommodation within built up areas.

FIGURE 41. DEVELOPMENT WITHIN AND OUTSIDE OF SETTLEMENT BOUNDARIES
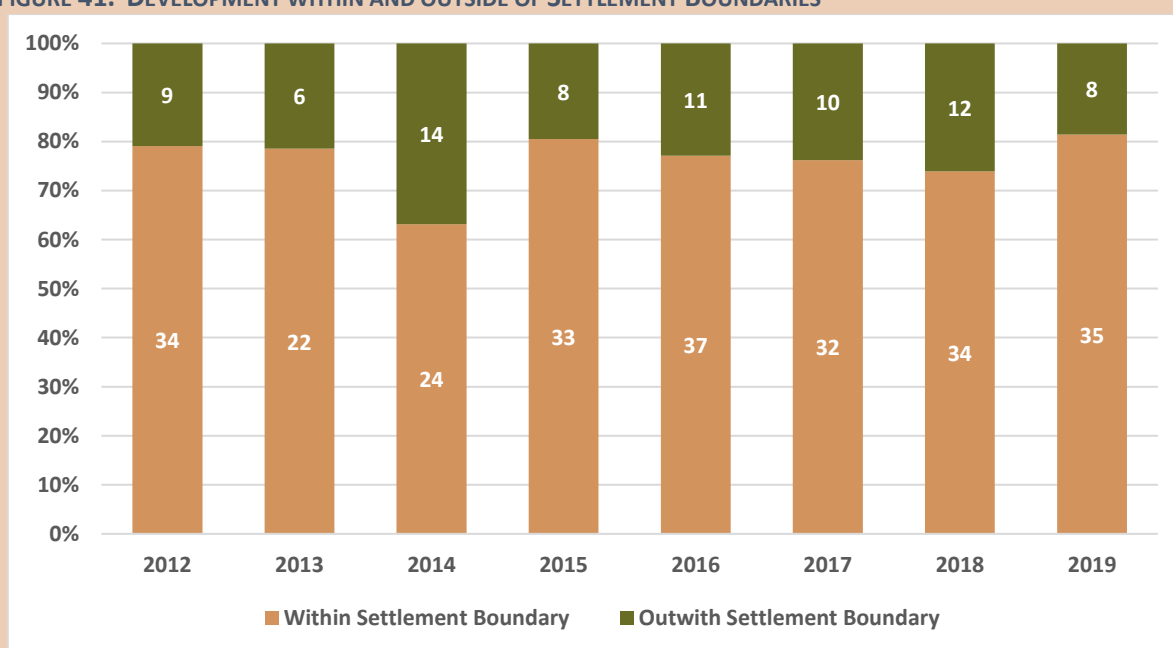
SOURCE: EAC. ASSEMBLY, LEISURE & RECREATION, BUSINESS, FINANCIAL, PROFESSIONAL & OTHER SERVICES, FOOD & DRINK (& PUBS), GENERAL INDUSTRY, HOT FOOD TAKEAWAY AND RETAIL

4.1.13. Main issues emerging – Housing development has and is programmed to take place unevenly within the Council area, with a large number of dwellings being built in the northern part around Kilmarnock, Stewarton and Fenwick and rather less in the southern areas of Cumnock and the Doon Valley. Stewarton in particular is coming under substantial pressure and it is considered that a review of how to accommodate future growth should be undertaken. Furthermore, development that has taken place has sometimes been located out with settlement boundaries and allocated sites. An expansion of the boundaries of the Rural Protection Area (RPA) might therefore be necessary. The Bellfield Interchange is constraining development in Kilmarnock, however, there is an opportunity to focus new growth in the area; a study exploring the possibility of undertaking development at Bellfield is ongoing. The area to the north of Kilmarnock has also been suggested as a future growth area and South Central Kilmarnock could be targeted for redevelopment. ***These issues should be taken forward in LDP2.***

4.2. Placemaking

'Creating successful places is one of the main aims of this LDP' – LDP

Has the LDP achieved placemaking success?

4.2.1. **Introduction** – The LDP was adopted in 2017 and it is therefore too soon to determine whether the aims of the placemaking section have been achieved. Nevertheless, a brief assessment will be made of the actions taking place in the five town centres identified: Kilmarnock, Stewarton, Galston, Cumnock and Dalmellington. Lack of progress must therefore be considered within the context of the short time since the plan was adopted.

4.2.2. **Kilmarnock is expanding in the desired directions** – The LDP states that the future expansion of Kilmarnock should be to the north-west, west and south-west in residential terms. Whilst growth towards the north-west has yet to take place, Housing Land Audit 2019 programmes over 400 units in the area over the next fifteen years. Development to the west is ongoing, particularly in the Irvine Road area and more units are expected to be completed over the next fifteen years. Growth to the south-west has slowed in recent years and many of the sites are subject to a range of constraints.

4.2.3. **The Kilmarnock one way system has not yet been improved** – Improvements to crossing between the Palace Theatre and the town centre and other circulatory upgrades have not taken place. Developers in Kilmarnock must however make a contribution to these projects and it is hoped that they can be delivered in the future.

4.2.4. **Green/blue network improvements in Kilmarnock have not yet been delivered** – A 'figure of 8' cycle and footpath and improvements to the riverside have not yet been achieved. It is still early in the plan period, however, and it is expected that such upgrades will eventually take place. East Ayrshire Leisure are developing a large scale green active travel route around Kilmarnock, which will include improvements in and around the town centre.

4.2.5. **Redevelopment in Kilmarnock has taken place** – An upgrade to the multi storey car park has not yet taken place, the creation of a specialist shopping hub on Bank Street and John Finnie Street has been hampered by difficulties in the retail sector. The bank building on King Street remains vacant, King Street has not been transformed into a nightlife hub and the former ABC cinema on Titchfield Street remains disused.

4.2.6. Various other listed improvements have however been achieved. The Ingram Enterprise Centre on John Finnie Street in Kilmarnock opened in 2018. As well as the restoration of a key building in the John Finnie streetscape and helping revitalise Kilmarnock's Historic Quarter, the Ingram Enterprise Centre provides a new concept in office space for start-up and expanding businesses. Free Wi-Fi is soon to be delivered to the commercial heart of the town centre and an underpass at the railway station was improved through a refresh in tiling and cladding achieved and the introduction of a lift. The Aldi store within the town centre area has been completed, occupying a prominent vacant side. Inroads have been made on the creation of 'cultural quarter' with the ongoing relocation of the Centrestage Theatre company into the old Kilmarnock Academy building.

4.2.7. **The regeneration of Cumnock town centre has progressed** - The Glaisnock Centre, a key development opportunity identified in the Cumnock placemaking map has been delivered and a new civic space created. New signage has been introduced, at the Square and a town trail is mapped out. Road and pavement surfaces in the core historic area have yet to be improved, however and landscaping and tree planting has yet to take place. Various other suggested improvements, including footpath upgrades have also not yet taken place.

4.2.8. **The Galston CARS scheme has been a success** - The Galston Conservation Area Regeneration Strategy (CARS), completed in summer 2019, has resulted in significant improvements to the town centre area. The Portland, Buck's Head Inn and the Principal Café have all been refurbished, the dilapidated Co-Op building has been demolished and new plans for the site were approved by Council Cabinet in February 2019.

4.2.9. **Main issues emerging** – Whilst much has been achieved, a review of the Council's approach to Placemaking will take place as LDP2 is developed, taking into consideration a requirement for the preparation of Local Place Plans outlined in the recently published Planning (Scotland) Act 2019. *These issues should be taken forward in LDP2.*

4.3. Enabling New Housing

'Well integrated and designed housing which provides high quality green infrastructure will contribute positively to making East Ayrshire a successful, sustainable and healthy place and will assist in retaining existing and attracting new residents' - LDP

Has the LDP delivered a sufficient number of new homes?

4.3.1. **Introduction** – More houses are being delivered and are programmed to be delivered in East Ayrshire than at any time since 2008 and an abundant supply of available allocated land remains. It is the case however that the Housing Supply Target (HST) will not be met and may be overambitious for some areas, that development is often not taking place in the most sustainable locations, that some allocated sites may not be viable and that various LDP policies have shortcomings.

FIGURE 42. EAST AYRSHIRE COUNCIL HOUSING UNDER CONSTRUCTION AT FRASER WALK, KILMARNOCK

SOURCE: EAC

4.3.2. **Most housing development is projected to take place on allocated land** - The 2019 Housing Land Audit (HLA) projects that there will be an increase in the number of house completions in the year 2019-2020 when compared to previous years. Around 10% of committed developments at the time of the HLA will take place on windfall sites during the 2019/20 to 2023/24 forecasting period. Whilst these developments will not take place on EALDP allocated land, almost half will be built on land classified as brownfield and developments are therefore broadly in compliance with EALDP policy that prioritises construction on previously used land.

4.3.3. **Housing land remains available in large quantity** - More houses have been built over the last five years than at any time since the 2008 financial crisis. Nevertheless, there remains a generous supply of housing land, located in almost every settlement development area and in

areas of high demand. Four sites in the Kilmarnock and Loudoun area alone are capable of accommodating more than 200 dwellings each. In addition, allocated Mixed Use Opportunity and Miscellaneous Opportunity sites do not have stated site capacities in terms of housing but are capable of accommodating a significant number of new homes.

FIGURE 43. REMAINING LDP ALLOCATED HOUSING CAPACITY AT APRIL 1 2019 BY SUB HOUSING MARKET AREA
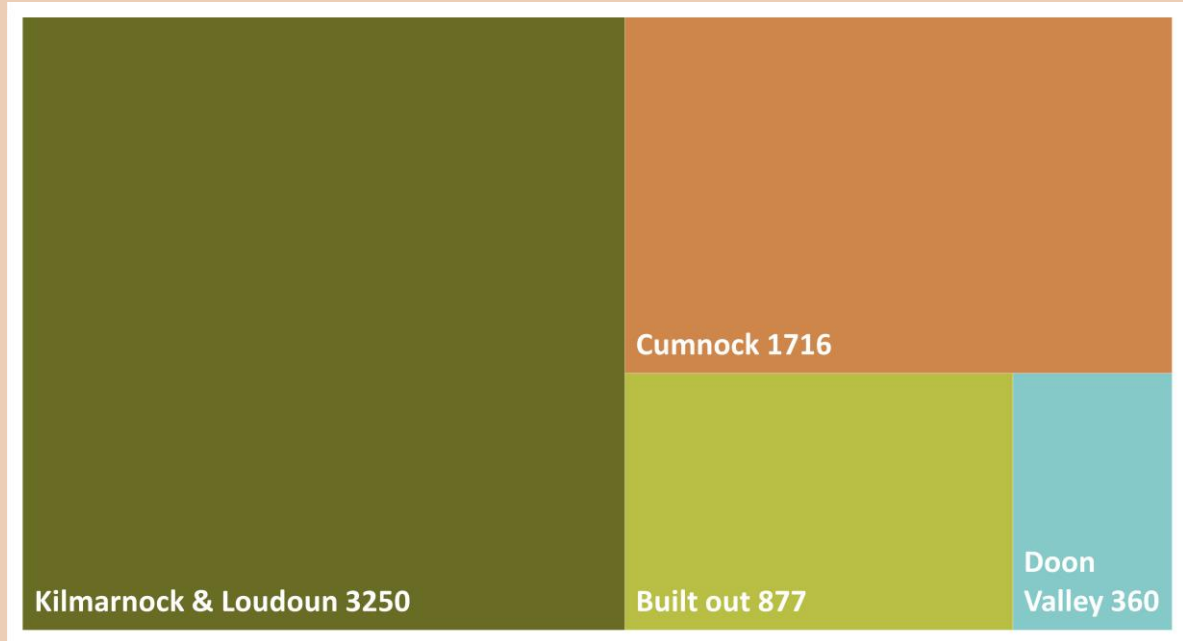
SOURCE: EAC MONITORING. 'BUILT OUT' REFERS TO FORMER CAPACITY WITHIN SITES THAT HAVE BEEN CONSTRUCTED TO SITE COMPLETION.

4.3.4. **Some allocated housing sites may not be viable** - Despite this stated capacity, there is some doubt as to the suitability of a number of allocated sites, either as a result of difficult to overcome constraints like flooding or access, or because of a lack of demand. The problem is particularly prominent in the south of the Council area, where market demand is limited but the costs of remediation may be high, particularly given its history of mining and heavy industry.

4.3.5. **The Housing Supply Target is unlikely to be met** – Housing Supply Targets (HST) represents an annual target to be delivered in each of the five years of the Local Housing Strategy (LHS). It is extrapolated from the HNDA and takes in account 'real world' factors such as land availability, capacity limits and spatial strategy. Whilst the number of completions is expected to increase, the majority are expected to be developed in Kilmarnock and Loudoun and the target is unlikely to be met, albeit with a slight shortfall of five homes.

FIGURE 44. CUMULATIVE PROGRAMMED COMPLETIONS & HOUSING SUPPLY TARGET (2019/20 TO 2023/24)
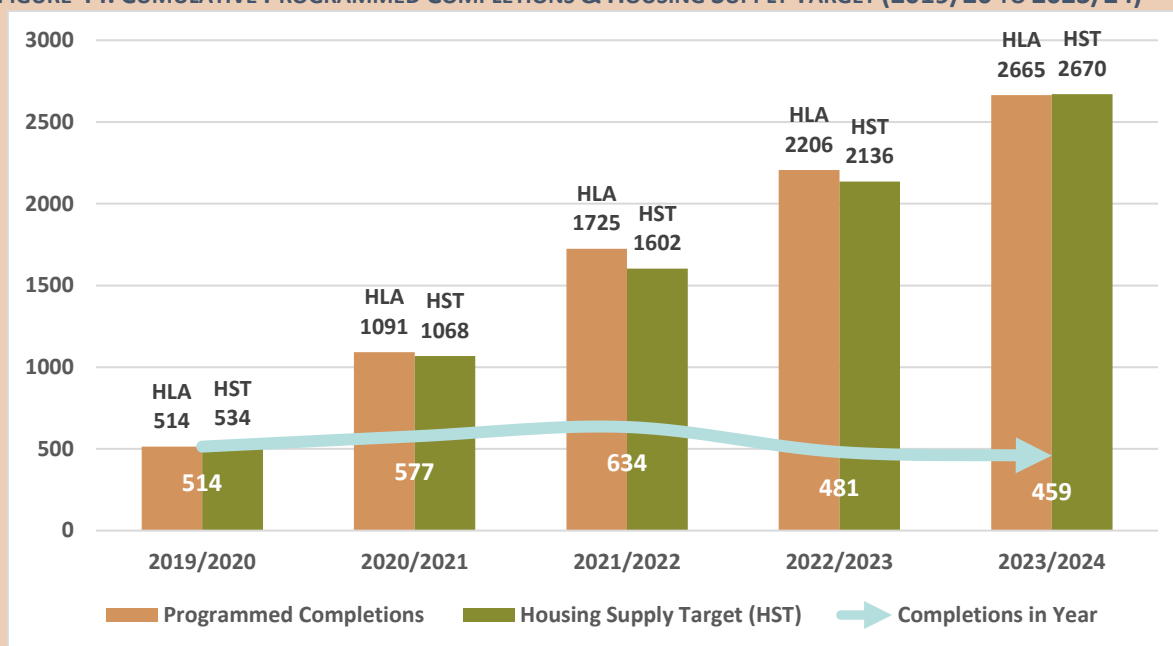
SOURCE: EAC MONITORING. CUMULATIVE COMPLETIONS PRESENTED.

4.3.6. **The Housing Supply Target may require an update -** The Housing Supply Target has presented some issues as it may have been overestimated for some parts of the Council area. It has been suggested by various applicants that have been refused permission on the basis that their development would not take place on allocated land, that some of the sites provided in the LDP are not viable, as has been highlighted in section 4.4.3. The disparity between the programmed number of completions and the HST will have to be addressed as LDP2 is prepared.

4.3.7. **Council house design quality has been high** - East Ayrshire Council is undertaking a programme of housebuilding across the Local Authority area. Developments that have been completed to date have closely followed Council Design Guidance and are consequently of a very high quality, both in terms of the materials used in their construction but also in the approach taken to urban design. In particular, parts of Kilmarnock are being refreshed through the demolition of low demand housing and replacement with new homes of a superior design.

4.3.8. **Affordable housing targets are programmed to be achieved** – The number of projected completions of affordable housing built directly by East Ayrshire Council and Registered Social Landlords is programmed to be 15 short of the affordable housing component of the Housing Supply Target (HST). Various projected developments outlined by the Council's Strategic Housing Investment Plan (SHIP) have yet to be located, however and affordable homes estimated to be completed by private house builders provide an additional supplement to the total.

FIGURE 45. CUMULATIVE PROGRAMMED COMPLETIONS OF AFFORDABLE HOUSING (2019/20 TO 2023/24)
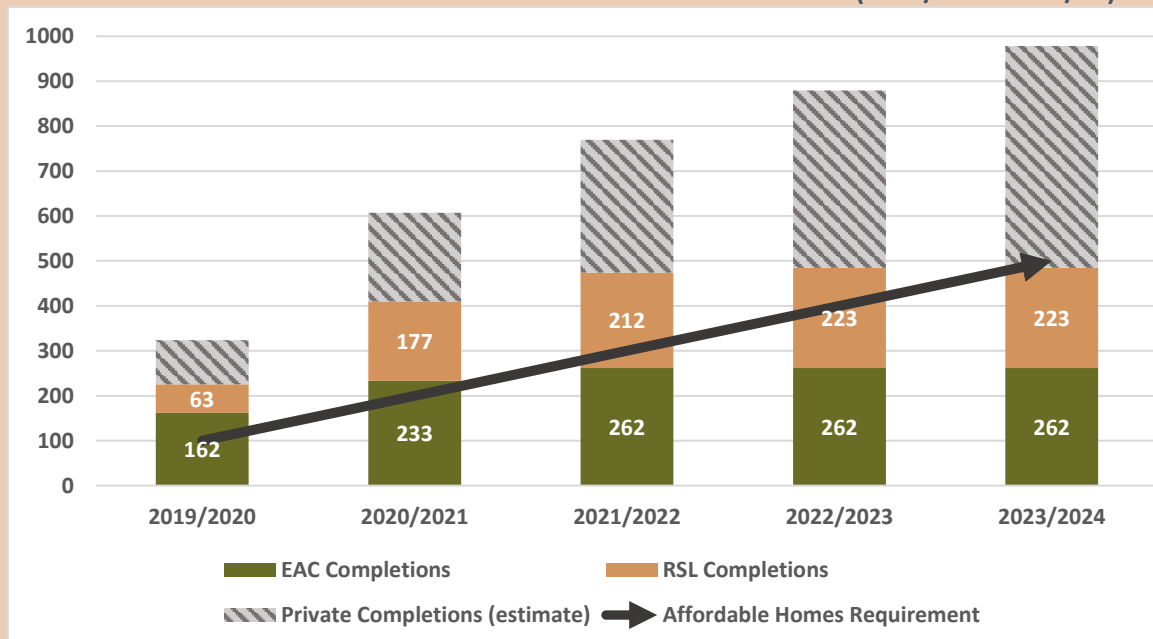
SOURCE: EAC MONITORING. PER ANNUM COMPOUNDED AND COMPARED TO A COMPOUNDED AFFORDABLE HOMES REQUIREMENT.

4.3.9. **Brownfield land has been redeveloped** - The Council's housing programme has made extensive use of brownfield sites. All 9 Council Housing developments built on LDP allocated land have been constructed on previously used land and 158 homes have been delivered. The redevelopment of brownfield land has eliminated prominent vacant and derelict sites in Cumnock, Galston and Kilmarnock and has provided good quality housing in established and serviced residential areas.

4.3.10. **Mapping of Rural Protection Area presents problems for users** – The Council has been made aware by various applicants that the mapping of the Rural Protection area is inconsistent in places and that a large number of PENQ enquiries are placing a burden on the resources of the service. Mapping could therefore be developed using a more coherent methodology.

4.3.11. **Housing in the rural diversification area policy has presented challenges** – A recent application argued that a proposed development would form part of a cluster as defined in policy RES5 that states that a cluster should contain no more than 15 dwellings. An expanded settlement boundary had however reduced the number of dwellings outside the boundary to 10, thereby making the development of less than six units acceptable in policy terms. It is therefore suggested that settlement boundaries be reviewed to avoid a repeat of the issue.

4.3.12. **Bad neighbour developments could be better described** – Policy RES11 – Residential Amenity seeks to protect new and existing residential developments from 'bad neighbour' developments but no mention is made of the sort of development that may constitute. A list in the appendices of the plan drawn from legislation would provide clarity in this area.

4.3.13. **Enabling development policy is valuable but has limitations** – RES13: Enabling Development only refers to the provision of housing and makes no mention of using tourism or other types of business to fund the restoration or improvement of a statutorily listed structure. This issue

proved to be problematic when development of that type was proposed at Loudoun Castle in the Irvine Valley. Furthermore, the policy only mentions permitting development that would prevent the loss of a listed residential or institutional building; there could be merit in exploring widening this definition to include a larger range of listed structures or buildings that have been identified as having value in a Conservation Area appraisal.

4.3.14. **Residential extensions to settlement policy requires strengthening** – It is considered that Policy RES2: Residential extensions to settlements creates a loophole whereby developers can justify development in the countryside should the Housing Land Requirement (HLR) not be met within a five year window. Policy in LDP2 may have to be more prescriptive in order to clarify the circumstances under which development of that kind would be acceptable. It is also suggested that settlement boundaries be reviewed to avoid a repeat of the issue.

4.3.15. **Main issues emerging** – Despite an increase in the number of houses completed in recent years and projected for the years ahead, the number of units being delivered in Cumnock and the Doon Valley falls short of the requirements of the Housing Supply Target. Furthermore, a substantial number of allocated sites in the south are subject to constraints that may be off-putting to developers in an already subdued housing market. New SEPA flooding guidance has rendered a larger area than was previously thought subject to pluvial and fluvial flood risk. A reassessment of the suitability of certain allocations will therefore have to be made to account for these likely impacts. Enabling development policy could be fully reviewed. Policy RES2 requires to be reinforced to stipulate when and where residential extensions to settlements can occur. ***These issues should be taken forward in LDP2.***

More information on programmed house completions can be found in Housing Land Audit 2019

4.4. Successful Town Centres

'The key role of the Local Development Plan is to promote town centres as the prime destinations for all footfall generating uses and to encourage a wide range of uses into town centres.' – LDP

Has the LDP supported and focused on town centres?

4.4.1. **Introduction** – East Ayrshire's town centres continue to face challenges. Unit vacancy has risen in some, demand for new retail development remains subdued, footfall generating uses have often been developed outside of town centres, town centre boundaries often do not reflect the location of town centre uses and the quality of town centre environments is variable. By contrast, new office development has predominantly taken place in town centres, takeaway development has been supported in town centres and discouraged elsewhere and town centre strategies have and are being prepared.

FIGURE 46. THE INGRAM ENTERPRISE CENTRE, JOHN FINNIE STREET, KILMARNOCK

SOURCE: EAC

4.4.2. **Development of retail space remains steady but is subdued** – The number of applications for new or redeveloped retail space has been low. The area of approved floor space increased for a number of years, spurred by the approval of the new Glaisnock Centre in 2017 and Aldi in 2018 and was subject to large fluctuations, but fell to a very low level in 2019. Large supermarket developments took place within town centre boundaries and accounted for 769m2 and 998m2 of new retail space respectively. A single application for new retail space on the periphery of Galston was refused in 2017 because of the adverse impact it would have on the town centre. Of those applications of more than 400m2, three were located in town centres and two outside of town centres. One was for additional space within an existing retail unit at Queens Drive in Kilmarnock, an established retailing area. The other application was the proposed Aldi store in Stewarton, immediately outside the town centre boundary.

Area m2 outside TC ▬▶   **Area m2 in TC** ▬▶
Trend (Area outside TCs) ▬▶   **Trend (Area in TCs)** ▬▶
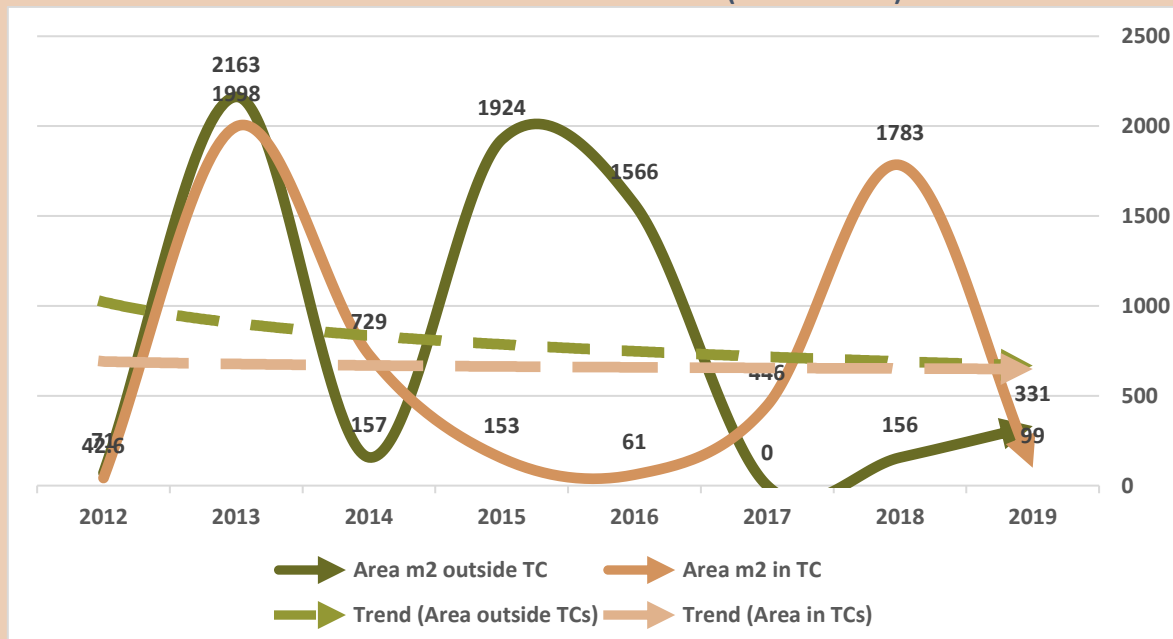
SOURCE: EAC MONITORING

4.4.3. When considered in finer detail, the total approved area of completely new retail floor space was substantially higher than that of converted space during the 2012 to 2019 period. Conversions account for a substantial amount of space, however, and the reuse of units is a positive phenomenon in the context of the rise in vacancy in recent years. The trend over the years 2012 to 2019 has been one of proportionally more approved retail uses within town centres, a positive phenomenon given the pressures experienced by such areas.

FIGURE 48. TOTAL APPROVED AREA OF RETAIL FLOOR SPACE, NEW/CONVERTED (2012 TO 2019) IN M2

New floor space (m2) ▬▶   **Converted floor space (m2)** ▬▶
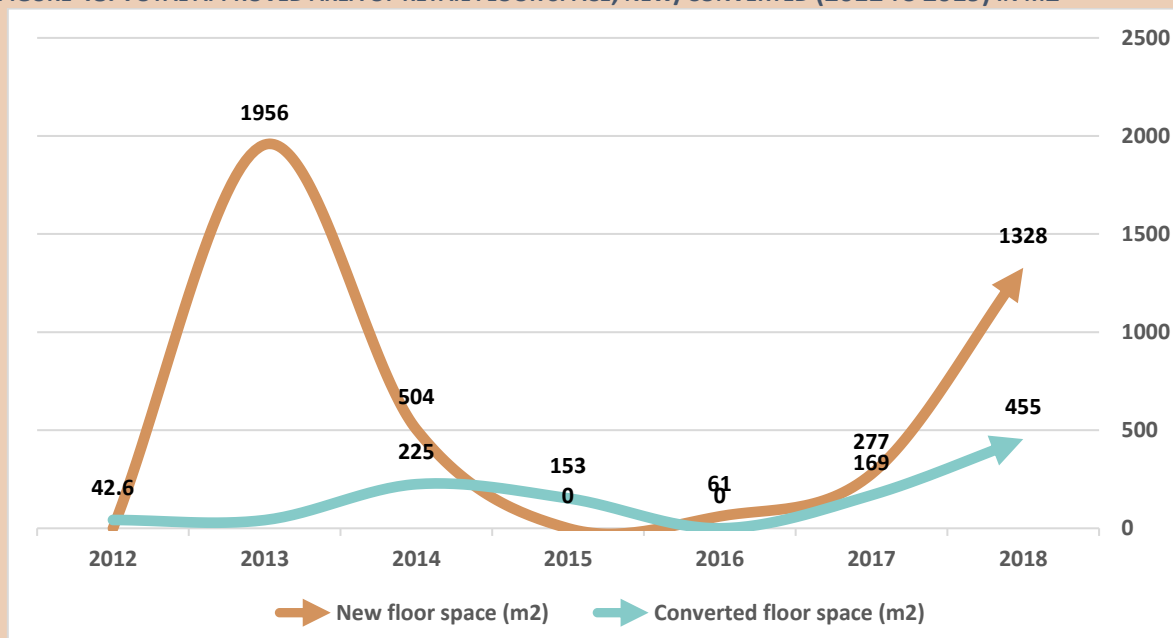
SOURCE: EAC MONITORING

4.4.4. **Unit vacancy has risen despite policies designed to support centres** – Cumnock town centre has experienced a substantial reduction in non-residential unit vacancy since the town centre

health check of 2016 and a stabilisation in rates was recorded in Dalmellington, Galston and Stewarton. The LDP identifies that Kilmarnock had a high level of unit vacancy at the time of Plan preparation, however, an increase of more than 20% in the number of vacant units has taken place since 2016 and LDP2 must ensure that the town retains its retailing position.

FIGURE 49. THE FOREGATE, KILMARNOCK

SOURCE: EAC

4.4.5. **Change of use accounts for a substantial reduction in retail floor space in town centres** – To view the number of approvals for new space in isolation is not sufficient if an understanding of changes to the retail sector is to be gained. Approximately 7000m2 of retail space was approved to be converted from shops to other uses in town centres between 2012 and 2019. A significant portion of approved change of use was from retail to food, drink and takeaway uses. Whilst retail space has been lost this shift is encouraging and suggests that new uses can be found for redundant existing retail space. A far smaller number of changes of use from food, drink and takeaway to retail space were, by comparison, approved.

4.4.6. In the context of rising unit vacancy, it is perhaps less positive that such a small number were converted to homes. A change of use of ground floor units to homes is extremely uncommon, despite a general requirement to find new and sustainable uses for vacant retail properties. These figures present those applications for change of use from each category and do not highlight the number of town centre units that have become vacant or reoccupied in recent years. Statistics presented in the Town Centre Health Check will provide more detail of changes in the number of total occupied units.
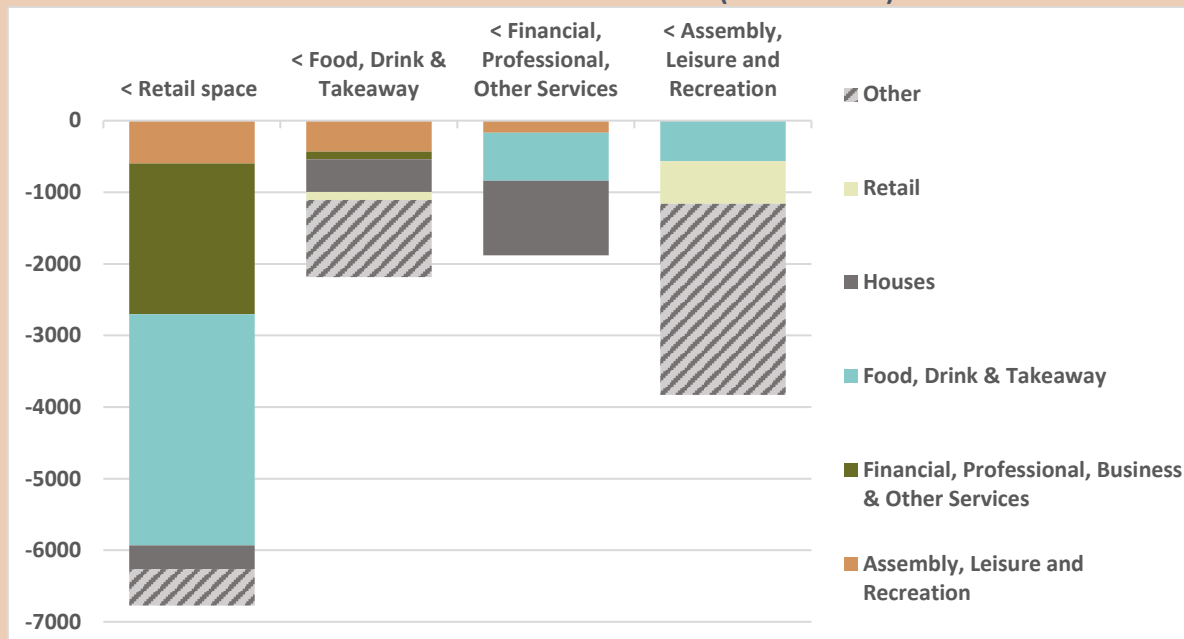
SOURCE: EAC MONITORING. CHANGES OF USE BETWEEN EACH CATEGORY (<) TO OTHER CATEGORIES IN M2

4.4.7. There was a slight net approved reduction in retail floor space to approved other uses during the 2012 to 2019 time period as well a significant gain in the floor space of assembly and leisure space, as well as financial, professional and other and food, drink and takeaway space. There has been a relatively healthy demand for food, drink and takeaway space, most commonly at the expense of retail space (see above).

FIGURE 51. LOSS/GAIN OF TC FOOTFALL GENERATING USES (2012 TO 2019) IN M2
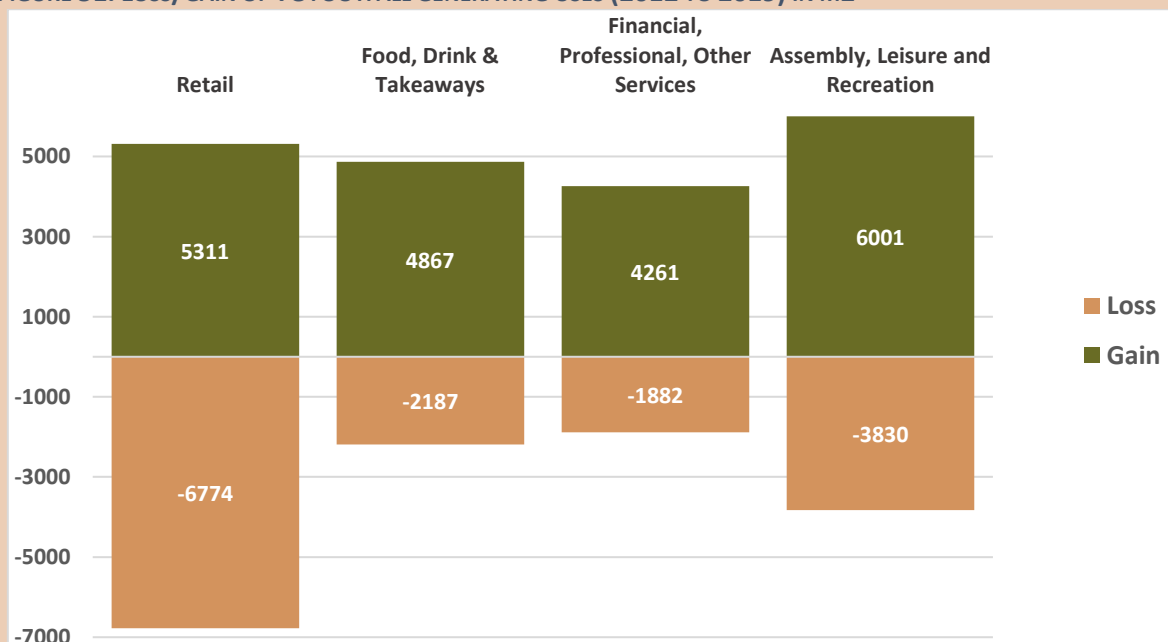
SOURCE: EAC MONITORING. APPROVED FOOTFALL GENERATING USES IN TOWN CENTRES.

4.4.8. These figures present those applications for change of use from each category and do not highlight the number of town centre units that have become vacant or reoccupied in recent

years. Statistics presented in the Town Centre Health Check provide more detail of changes in the number of total occupied units.

4.4.9. **Town centre strategies have and are being prepared** – Much of the strategic work aimed at regenerating town centres has focussed on Kilmarnock, the key retail destination in East Ayrshire. It was decided by Cabinet in summer 2018 that an updated Kilmarnock Town Centre Strategy and Action Plan should be prepared, work of which is ongoing as of early 2020. A survey of business owners associated with the work will determine the strengths and weaknesses of the current retailing market and the future of the Galleon Centre was put to public consultation in August 2019.

4.4.10. **Regeneration in Cumnock town centre has been achieved** – The redevelopment of the Glaisnock Centre was undertaken in 2017/2018. The LDP states that 'any footfall generating development which serves the southern part of East Ayrshire will be directed to Cumnock town centre'. This aim has been achieved in part due to the provision of a new and larger unit for Farmfoods at the Glaisnock Centre that has allowed it to retain its location in the town centre and act as a *de facto* anchor store for a wider retailing area.

4.4.11. **The quality of town centre environments is variable** – The environment of some town centres was assessed as requiring improvement by the town centre health check 2019, notably that of Dalmellington and Stewarton. Heavy traffic flow in Stewarton in particular is having a detrimental impact on the town centre although this problem could be alleviated by funding after a reconsideration of developer contributions policy. Improvement initiatives have however taken place, namely work towards a cultural quarter in Kilmarnock and a town centre strategy for Kilmarnock being developed as of early 2020.

4.4.12. Policy TC5 – Improving town centre environments provides support for interventions aimed at improving town centre environments but may be unnecessary given the support such proposals are likely to receive in almost all cases. It has been suggested that more effective would perhaps be a policy requiring all proposed developments to be of a high design quality that employs criterion (v) of OP1.

4.4.13. **Footfall generating uses within town centres have been encouraged** – The Spatial Strategy in the LDP directs larger scale footfall generating uses to Kilmarnock town centre and mention is made of brownfield sites to the south of the town centre that are supported by the Plan. Consents within the town centres of East Ayrshire are dominated by footfall generating uses, however, any gains appear to be offset by a reduction in the overall number of active businesses, as detailed above.

4.4.14. An application by Aldi for a store located within the Kilmarnock town centre boundary was approved in April 2018 and made use of a long standing vacant area of land allocated in the LDP as a miscellaneous opportunity site. Farmfoods' relocation to a new store in the redeveloped Glaisnock Centre was also supported by the Council. An application for an Aldi store located at Rigg Street in Stewarton, out with the town centre boundary, was however approved two years prior to the adoption of the LDP. An application to alter building design was made in 2019 and the company announced that it would open by the end of 2020.

4.4.15. **Town centre living has been supported by policy** - Promoting town centre living is one of the Council's strategic priorities. This involves building new housing in and around East Ayrshire's town centres, working with retailers and local businesses to improve town centres and villages and building on investment in town centre regeneration. The most obvious beneficiary of this approach has been Galston, where a wide range of improvements have been made, including the redevelopment of buildings and the creation of new homes through the aforementioned CARS scheme.

4.4.16. Town Centre Living boundaries were established in the LDP and encompass Kilmarnock and Cumnock town centres. These boundaries reflect the Council's strategic priority of town centre living and support the development of new Council house building as planned for through the Strategic Local Programme. The boundaries have, however, rarely been used when determining applications and there it is suggested that they could be removed when preparing LDP2. This strategic priority of town centre living is carried into the Council's Strategic Local Programme for Council House building, which promotes sites in and around town centres for building new Council houses. New Council housing has been developed within the town centre boundaries of Kilmarnock, Cumnock and at the edge of Galston town centre.

4.4.17. **Takeaway development has largely taken place out with town centres** – Approximately 1 in 4 of the twenty-five applications received for the creation of hot food takeaways since 2012 were refused. Proximity to homes was a material consideration in several of these refusals. Of those that were refused outside of a town centre, both were in part rejected due to their non-town centre location. Of those approved outside of town centres, however, a judgement based on location or the sequential test outlined Policy TC2 was applied and most took place within established secondary retailing areas within settlement boundaries. In general, the

trend has been towards town centres being the typical approved location for such uses and there has been a long-term numerical decline in the number approved elsewhere.
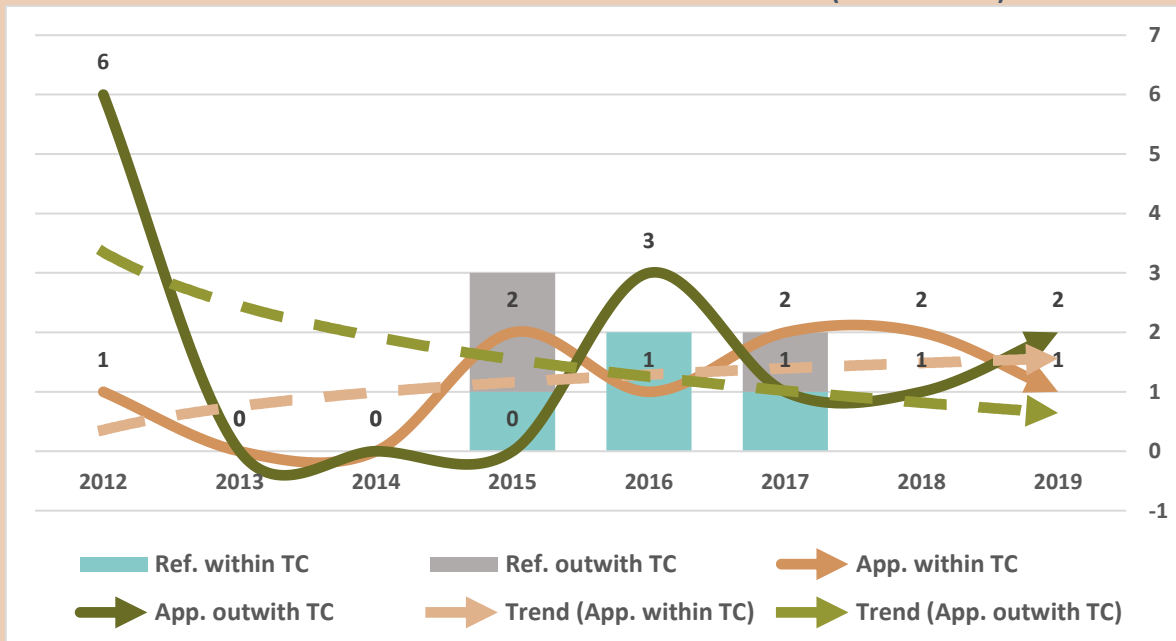
SOURCE: EAC MONITORING

4.4.18. The policy statement in the LDP is similar to that of RTC15 in the 2010 Local Plan. As such, it can be determined that the policy performs adequately, although it could potentially be merged with a wider town centre policy in LDP2.

4.4.19. **Food, drink and pub development has increasingly taken place within town centres** – Approvals food and drink uses have fluctuated in terms of floor space over the last five years, rising to 1997m2 in 2018 from a low of 165m2 in 2012. A slight majority of applications have however been approved for non-town centre locations. Policy TC2 and TC6 direct Class 3 uses to town centres and it is therefore the case that either town centres are not attractive locations in which to develop such floor space or that an increase in, for example, the tourism industry has resulted in a requirement for development of that kind to take place in more rural locations; e.g. sport/recreation related.

4.4.20. Applications are received and approved in an ad hoc fashion and it is difficult to identify the causes behind a trend. It is nevertheless the case that approvals of food, drink and pub applications have, after a period of decline, increasingly been located in town centres, particularly over the last five years. The most recent high profile approval was for the redevelopment of the former Wilko building in Kilmarnock as a mixed use development including a ca. 300m2 restaurant.
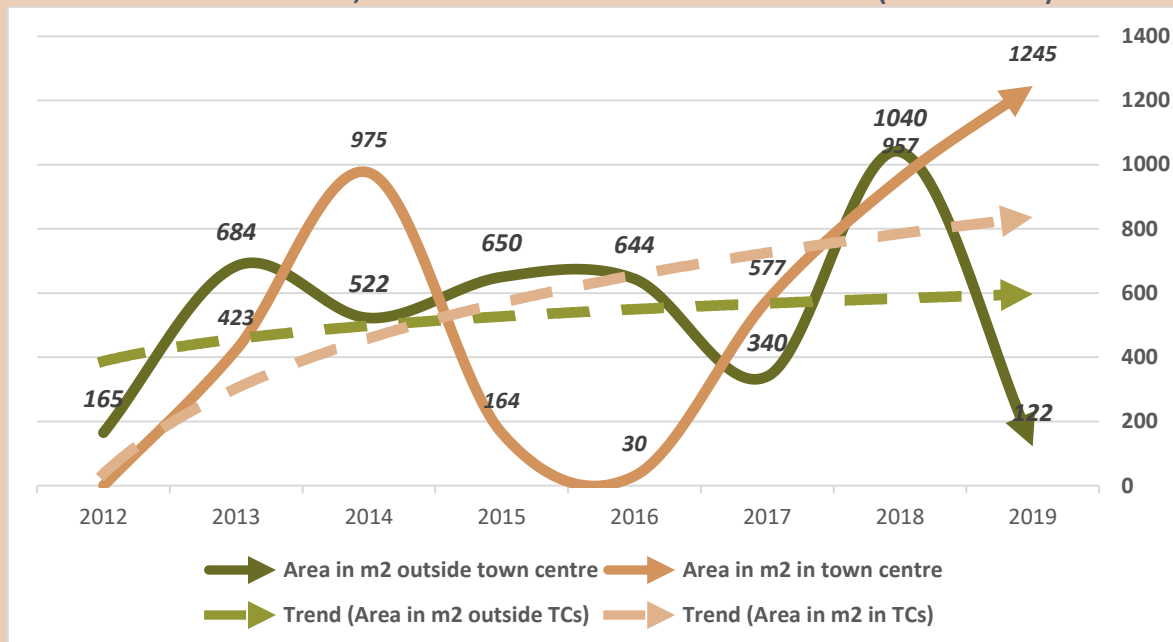
SOURCE: EAC MONITORING. FIGURES REFER TO NEW INDOOR SPACE ONLY – TERRACES/BALCONIES/BEER GARDENS NOT INCLUDED.

4.4.21. Town centre boundaries could be redrawn – The town centre areas defined in the LDP in some cases do not reflect the areas of greatest retailing and economic activity and could be redrawn to reflect the reduction in active retail units identified by the Town Centre Health Check and to encourage a shift to residential use in more peripheral areas.

4.4.22. New financial and services space has largely been located in town centres – Applications for financial, professional and services space have been received over the last five years have been few in number. It is however encouraging that the vast majority of proposals have been for the conversion of redundant spaces within town centres, the most high profile of these being the approval of a major development of new and upgraded office space on John Finnie Street, Kilmarnock in 2016.

4.4.23. Whilst the trend in locating in town centres may be positive compared to outwith town centres, it may also suggest that both the area of available vacant space in such locations is high and that the costs of development of new accommodation in allocated business sites may be prohibitive for some companies. The use of ageing accommodation may provide useful floor space in the short term but a lack of high quality office space may be off-putting to major developers in the years ahead.

FIGURE 55. APPROVALS OF NEW FINANCIAL, PROFESSIONAL AND OTHER SPACE (2012 TO 2019) IN M2
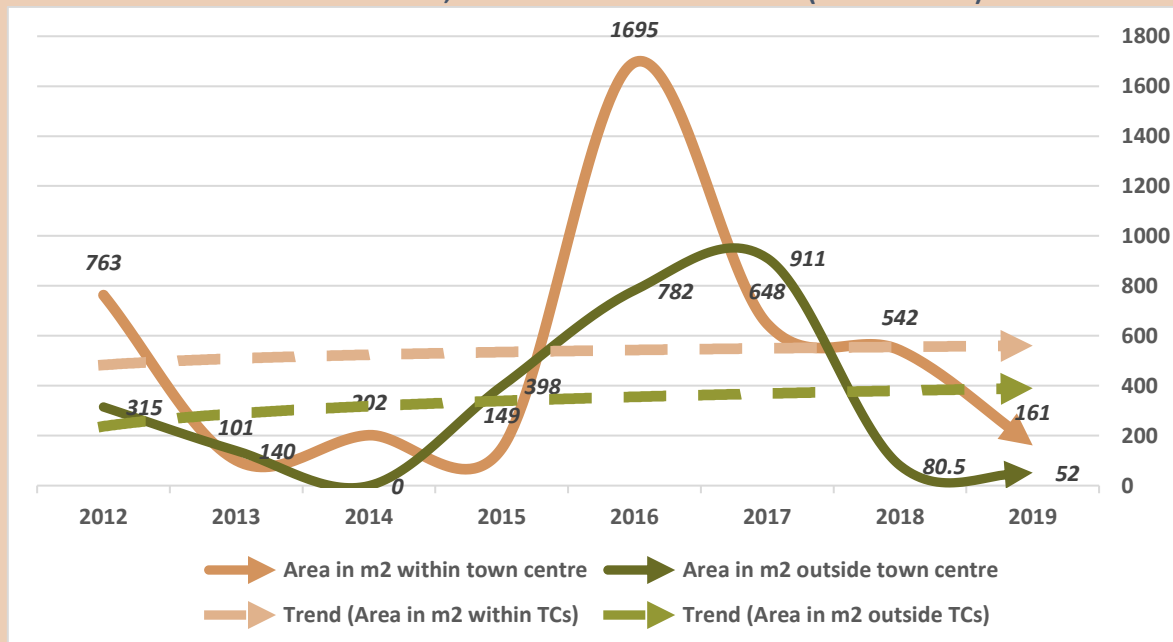
SOURCE: EAC MONITORING

4.4.24. **Footfall generating uses have predominantly been developed outside town centres** – For the purposes of this assessment, footfall generating uses include shops, financial, professional and other services, food and drink, assembly and leisure, amusement arcades, pubs and takeaways. The area of footfall generating uses located outside of town centres was greater than those within town centres and there has been a slight but long term upward trend in the size of non-town centre developments approved in terms of floor space; this increased to a slightly greater degree than the area of town centre developments.

FIGURE 56. APPROVED FOOTFALL GENERATING USES INSIDE/OUTSIDE TOWN CENTRE BOUNDARIES (2014 TO 2019)
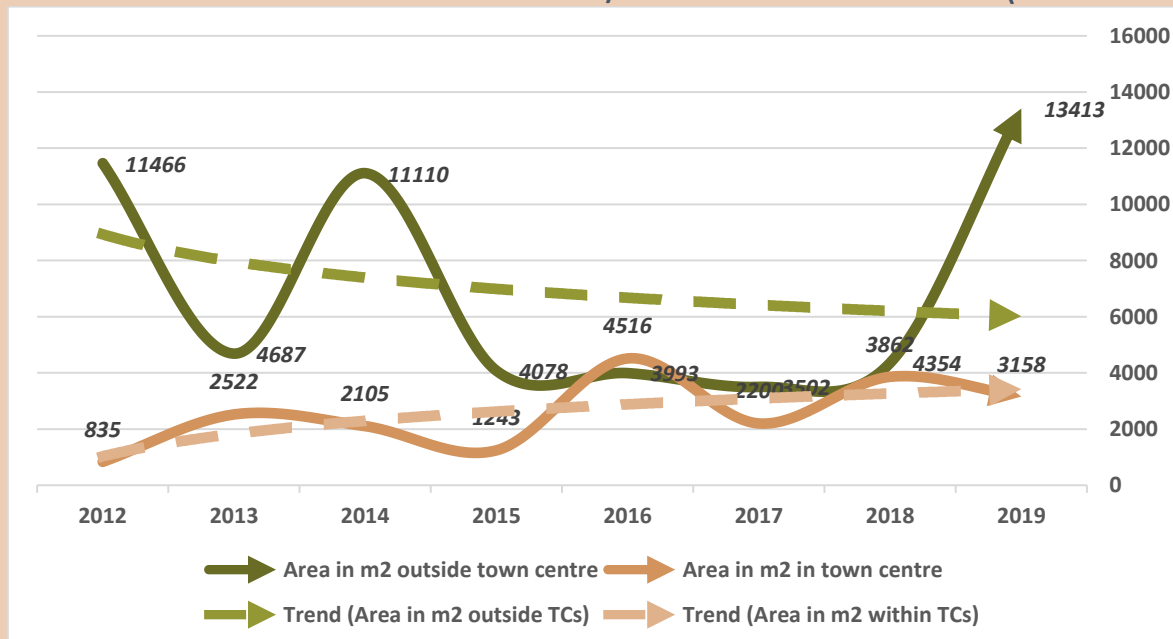
SOURCE: EAC MONITORING. M2. FOOTFALL GENERATING USES IN THIS INSTANCE INCLUDE RETAIL, FINANCIAL, PROFESSIONAL AND OTHER SERVICES, HOT FOOD, FOOD, DRINK, PUB, ASSEMBLY AND LEISURE USES. NON-TRADING SPACE FOR FINANCIAL, PROFESSIONAL, OTHER SERVICES. IN M2

4.4.25. It is nevertheless the case that a substantial amount of new 'floor space' outwith town centres has been of a nature unable to be accommodated within town centres and it is therefore reasonable that it might be located elsewhere. Two major assembly and leisure developments in 2014 and 2019 have skewed the figures and this should be taken into account when viewing the graph above.

4.4.26. **Main issues emerging** – An increase in the rate of unit vacancy is having an adverse impact on the appearance and vitality of several town centres, notably Kilmarnock. Efforts to address this trend should be made, potentially through the redrawing of boundaries or the creation of new types of policy aimed at encouraging the reuse of empty units. Town centre living boundaries are considered to have been of little use and could be omitted in the new plan. It is of some concern that footfall generating uses continue to be approved out with town centre boundaries, even if capable of being accommodated within them and this may deprive such locations of important employment and services. The wholesale improvement of town centre environments is an atypical occurrence, is likely to be supported by other Plan policies or could be included in a new design-based policy. Uses that are directed towards town centres have not always taken place within them and more may have to be done to ensure that the vitality and viability of town centres is maintained and enhanced. ***These issues should be taken forward in LDP2.***

4.5. Revitalising Our Economy

'The challenge for the LDP is to help to reduce unemployment and deprivation. It does this by locating strategic business and employment sites close to the strategic road and public transport network. It also builds upon innovative delivery mechanisms that have been successfully employed to ensure new businesses can access high quality sites and that our existing businesses can realise their expansion plans in their local area. '– LDP

Has the LDP encouraged and supported new employment development?

4.5.1. **Introduction** – Whilst business and industrial development is taking place in East Ayrshire, it has increasingly not taken place within LDP allocated sites and it has instead more often been undertaken in areas in the countryside or parts of settlements that have already been developed; demand for the use of mixed use sites for business and industrial purposes has been limited and demand for land at Kilmarnock North not forthcoming. Nevertheless, demand for land at Moorfield in Kilmarnock has been healthy and it is hoped that the Ayrshire Growth Deal (AGD) will stimulate further development of business, industrial and storage uses there and elsewhere in the coming years. In general, there has been a move away from industrial uses to those of a business nature, reflecting a nationwide trend.

FIGURE 57. GLENCAIRN INDUSTRIAL ESTATE, KILMARNOCK – AN ESTABLISHED COMMERCIAL AREA ALLOCATED FOR BUSINESS AND INDUSTRIAL USE IN THE LDP.
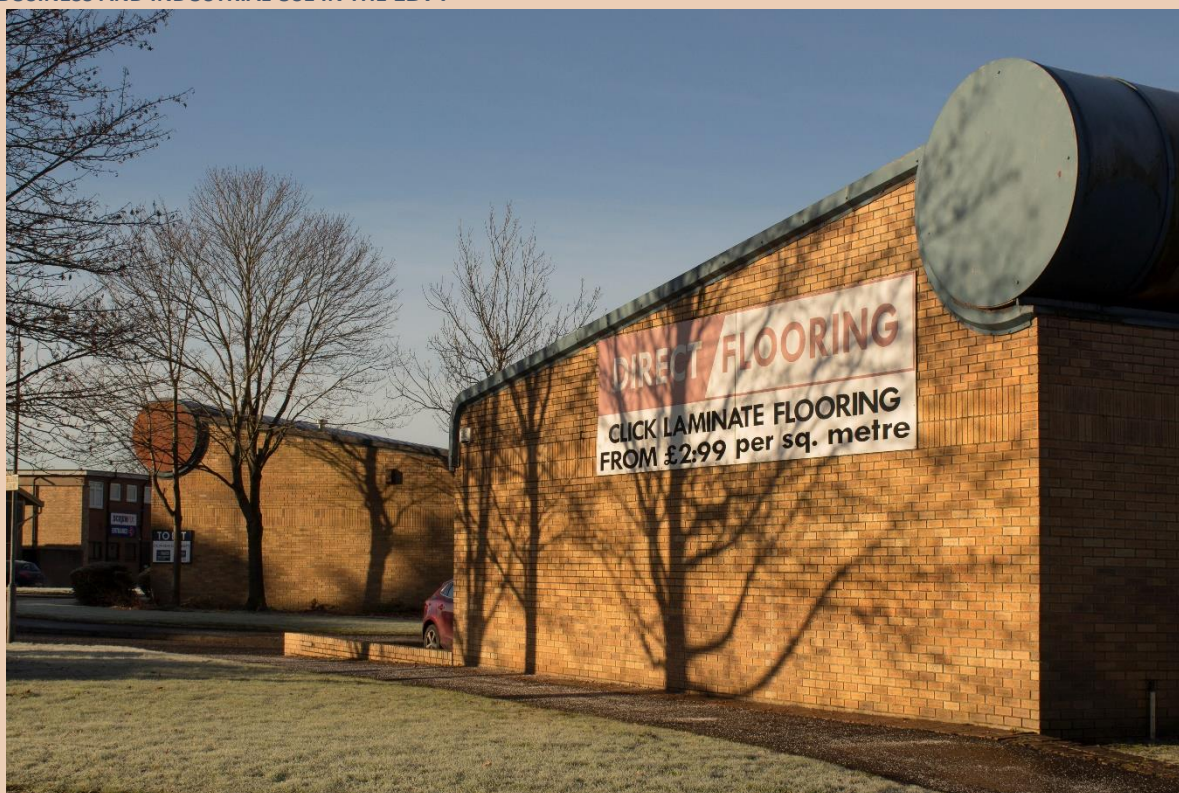
SOURCE: EAC

4.5.2. **The Ayrshire Growth Deal was announced** – The Heads of terms for the Ayrshire Growth Deal were signed in March 2019, providing a £250 million fund to encourage the creation of new jobs and opportunities for the Ayrshire region. The Scottish Government invested £100m of funding, that figure being matched by the UK government and the remaining £50m was sourced from a variety of regional partners. More information can be found here.

4.5.3. Demand for allocated business and industrial land has been limited – There has been a steady downward trend in the number of business, industrial and storage applications approved within allocated sites over the last five years, despite development of such a kind being directed to those locations.

Legend:
- Outside allocated sites
- Within allocated sites
- Trend (outside allocated sites)
- Trend (within allocated sites)

Data labels: 31396, 15048, 13777, 8778, 9507, 7810, 6535, 3380, 2074, 828, 744, 1788, 4644, 2205, 587, 2946

4.5.4. The proportion of such applications approved within LDP allocations, even with business applications omitted, has remained low and has declined. Nevertheless, the development of Moorfield Park in Kilmarnock has, for example, been successful and market demand for space there remains constant. Phase 3 is expected to be brought forward through the Ayrshire Growth Deal (AGD); LDP2 will consider whether there is further capacity beyond Phase 3.

FIGURE 59. NEW BUSINESS UNITS AT MOORFIELD PARK

FIGURE 60. TOTAL APPROVED NEW INDUSTRIAL AND STORAGE SPACE IN SQUARE METRES (2012 TO 2019) IN M2

Legend:
- (Industrial & Storage) within alloc sites
- (Industrial & Storage) outwith alloc sites
- Trend (within alloc. sites)
- Trend (outwith alloc. sites)
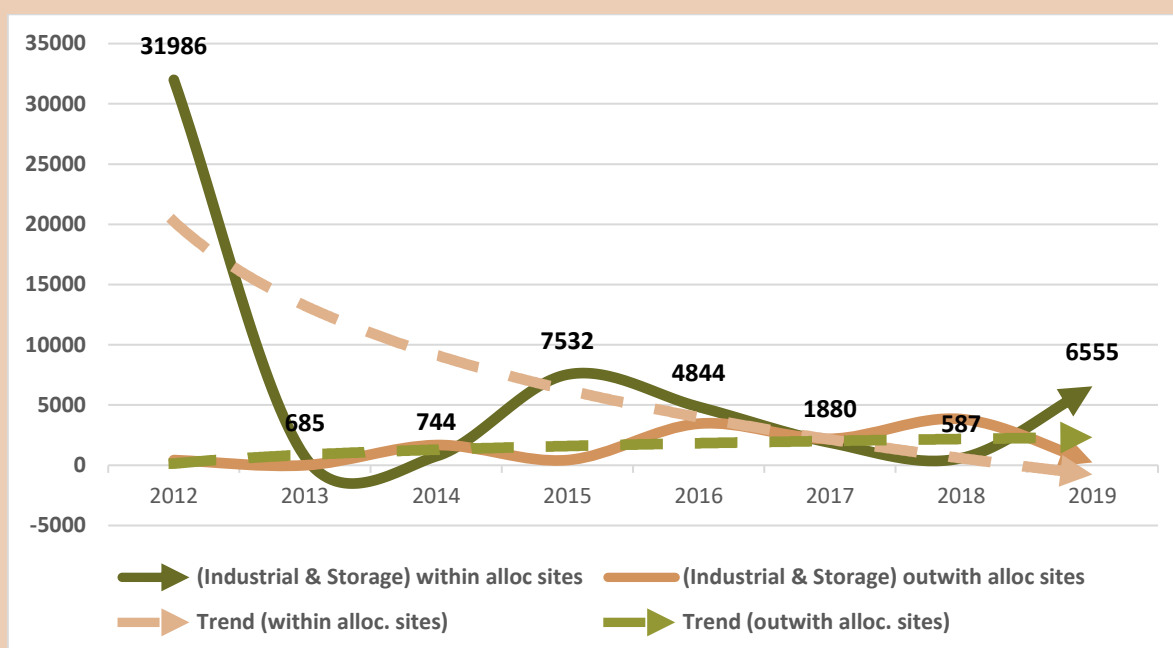
4.5.5. There has been a downward trend in the number of business, industrial and storage applications approved within LDP settlement boundaries. This figure is influenced by applications of an agribusiness, cattery or other rural nature, however, uses have also included industrial and storage types. Whilst in some cases these consist of extensions to existing businesses, they are nevertheless located in areas that are often not well served by transport services.

FIGURE 61. APPROVALS OF BUSINESS, INDUSTRIAL AND STORAGE OUT WITH SETTLEMENTS (2012 TO 2019) IN M2

Legend:
- Business (outside SB)
- Industrial (outside SB)
- Storage (outside SB)
- Within Settlement Boundary
- Outside Settlement Boundary
- Within Settlement - Trend
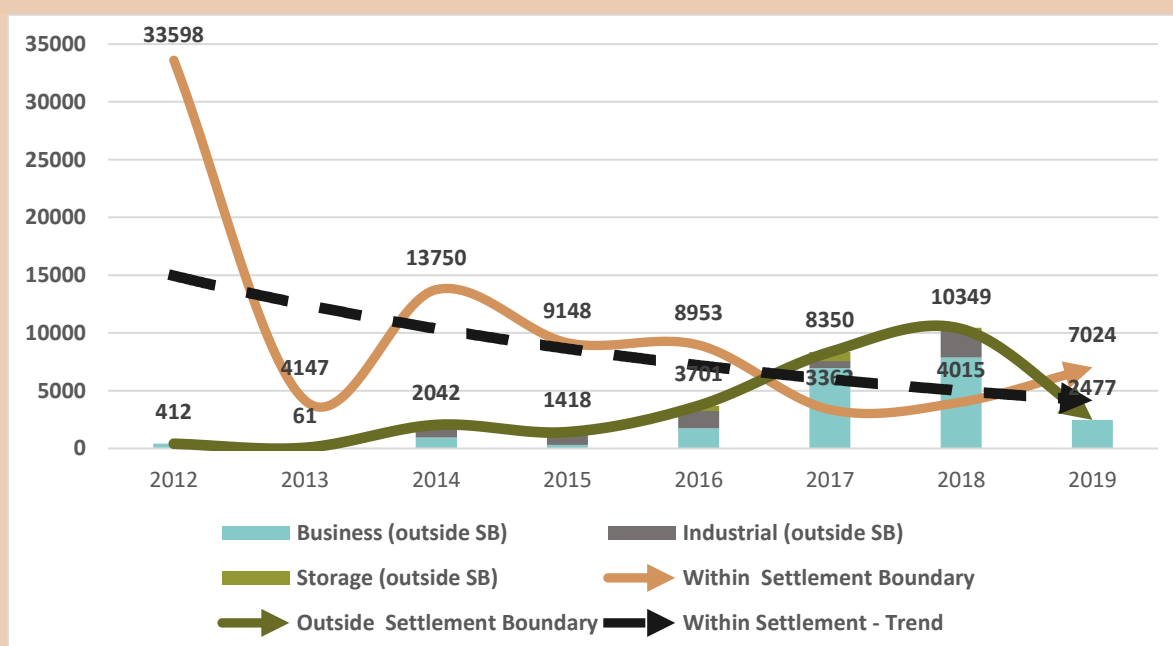
4.5.6. **Industry, storage and business space has seen gains** – There has been a high demand for new business space and around 50000m2 of new or converted space was approved between the beginning of 2012 and the end of 2019. Demand for industrial space was boosted by the approval of a major bottling plant in 2012, however, the gain experienced came in the context of a not insubstantial reduction in area.

FIGURE 62. LOSS TO OTHER USE/GAIN OF INDUSTRY, STORAGE AND BUSINESS SPACE (2012 TO 2019) IN M2
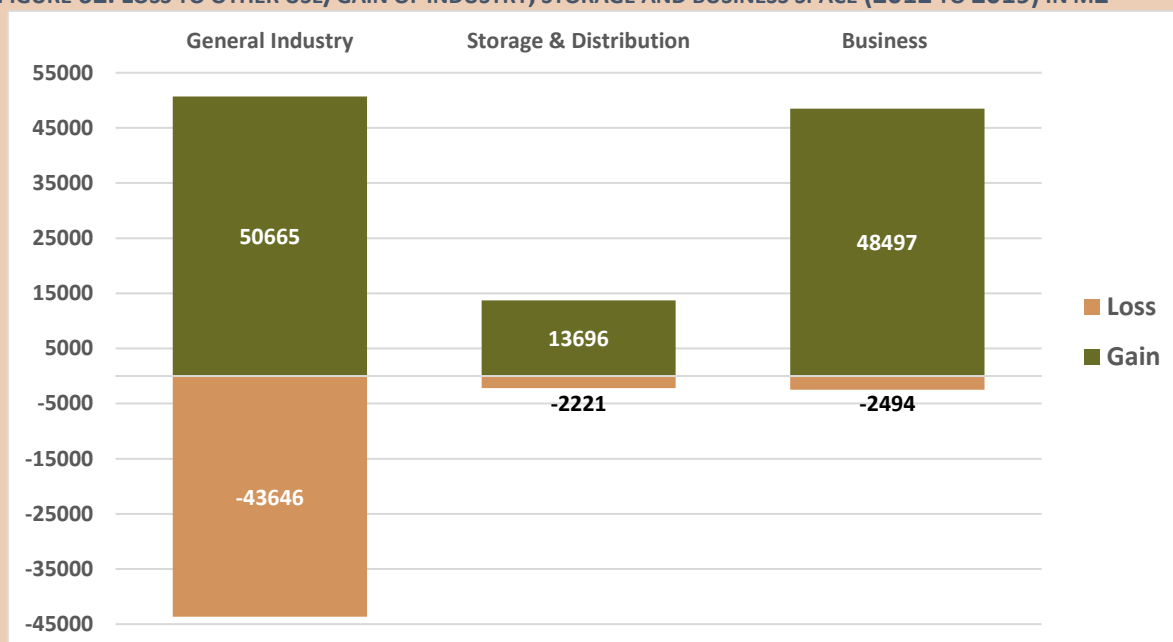
SOURCE: EAC MONITORING. GAINS AND LOSSES THROUGH THE APPLICATION PROCESS. LOSSES THROUGH DEMOLITION WITHOUT AN APPLIED-FOR NEW USE AND OTHER CHANGES HAVE NOT BEEN RECORDED.

4.5.7. **Business and industrial development site status requires better description** – There is a misunderstanding over 'safeguarded' and 'opportunity' sites in the LDP; those safeguarded sites within allocations being built out but necessitating protection from competing uses. A change to mapping to delineate these sites would make it more legible and provide greater clarity for potential developers and investors.

4.5.8. **Demand for Mixed Use sites has been limited** – Uptake of land in mixed use sites has been slow and there have been no applications for large scale mixed use developments since the adoption of the LDP. Whilst the LDP has only relatively recently been adopted, each of the sites identified for mixed use has previously been allocated, with the exception of 002MXD in Darvel. The Housing Land Audit suggests that 003MXD is expected to be build out over a period of fifteen years, exclusively for housing, however, a storage warehouse on the site was approved in 2018. Deallocation or reallocation of some of these sites may be an option.

4.5.9. **Industrial space has been lost to other uses** - Existing general industrial space has been subject to a shift towards other uses, predominantly housing, an indication that demand for manufacturing units is in decline. Whilst the reuse of former industrial space is unproblematic in the short term, there is the possibility that some properties will become disused in the future as units become outdated and require upgrading to meet modern business practices.
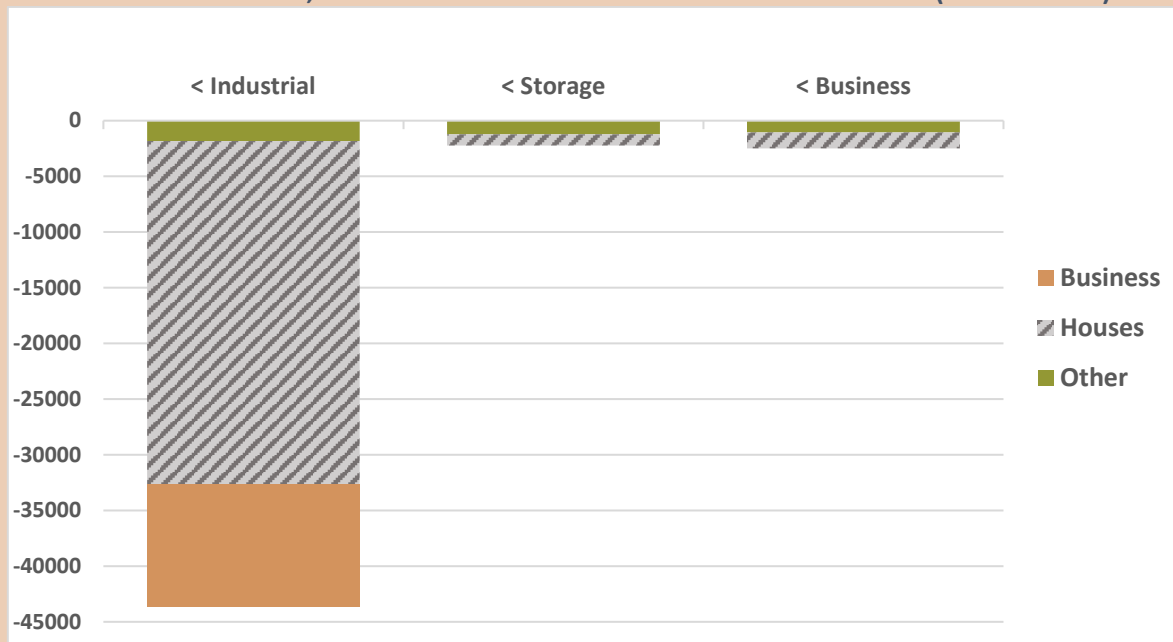
SOURCE: EAC MONITORING. OTHER USES ACCOUNTED FOR A SMALL NUMBER OF LOSSES/CONVERSIONS.

4.5.10. Alternative Use of Business and Industrial Land policy could be reworded or removed – IND 5: Alternative Use of Business and Industrial Land or Premises states that alternative uses may be permitted if it can be demonstrated that the area in question has been out of use for a 'significant' period of time, without clarifying what constitutes a significant period. Elements of the policy could, furthermore, be included in a combined policy.

4.5.11. Development at North Kilmarnock has not been forthcoming – Demand for sites within the Rowallan industrial estate has been limited and several large plots remain undeveloped. It is therefore uncertain that further development will take place in the area to the north allocated as 152B. As the statistics above demonstrate, development of business, industry and storage has more commonly taken place on unallocated sites, however, it is intended that LDP2 will refocus efforts at identifying various future uses for the area.

4.5.12. A business and industrial land report is to be prepared – This section provides a limited assessment of the state of industrial change of use and approvals. It is however intended that a full study of supply and demand in the sector is to be undertaken in order to gain a comprehensive understanding of current conditions. This study will be made available before the preparation of the Proposed Plan.

4.5.13. Main issues emerging – In general, business land within the Strategic Business Locations and Mixed Use sites remains in good supply. Demand for land has however been restrained in recent years and it may be the case that some sites could be reallocated for other purposes or deallocated. The LDP has supported such uses but many are not ideally located and an increasing number have taken place in the open countryside. Various policies could be removed or reworded to make the policy framework more succinct for potential applicants. *These issues should be taken forward in LDP2.*

4.6. Promoting Tourism

'East Ayrshire has significant potential for tourism. To realise this potential the LDP will maximise the role that tourism can plan in regenerating the economy through creating new businesses and jobs and in attracting new visitors to the area.' – LDP

Has the LDP encouraged and supported tourism sector growth?

4.6.1. **Introduction** – Approvals of tourism-related developments have steadily been made in recent years and the majority of these have taken place within settlement boundaries. Two large-scale developments were the major extension of the Newmilns dry ski slope and the adventure development at Crawfurdland Castle, each taking place out with the settlement boundary but each place-specific and large in terms of land use. Nevertheless, the majority of tourist accommodation development has taken place in the countryside and not within settlements.

4.6.2. **Tourist accommodation has largely been approved in the countryside** – No applications for tourist accommodation were refused between 2012 and 2019, however, the total number of applications was very small. It is implied in the LDP that locations within settlement boundaries and town centres would be preferable to development out with those areas due to no business case being required and no requirement to undertake a sequential test. A business plan and sequential test is required for all development of tourist accommodation outside of settlement boundaries. Although the number of proposals in settlement/town centre-based locations has been extremely low (two) over the time period, one such use was for the redevelopment of around 2500m2 of disused space in Kilmarnock town centre to a major hotel facility.

FIGURE 64. APPROVALS OF NEW OR ADDITIONAL TOURIST ACCOMMODATION DEVELOPMENTS (2012 TO 2019) M2
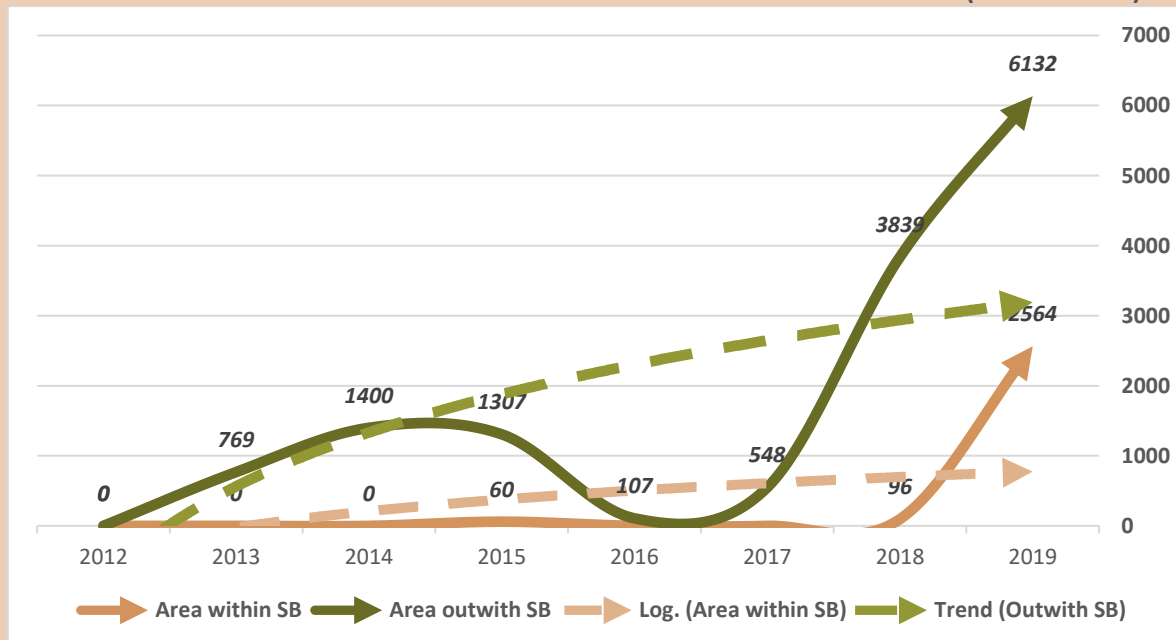
SOURCE: EAC MONITORING. NUMBER OF APPLICATIONS PER ANNUM. INCLUDES HOLIDAY LETS. SB REFERS TO SETTLEMENT BOUNDARY.

4.6.3. The number of applications for tourist accommodation development has risen markedly over the 2012-2019 time period and it is evident that the planning service actively supports such a vital part of the local economy.

4.6.4. **Approvals of leisure and assembly uses are increasingly located within settlements** – A greater proportion of assembly and leisure developments were approved within LDP Settlement Boundaries in 2019 than was the case in any previous year. Whilst there is no encouragement for settlement locations within LDP policy and approvals vary in size and economic importance, it is nevertheless encouraging that investment in the tourism offer available in the towns of East Ayrshire has increased. A significant proportion of leisure related development has however taken out with settlement boundaries, with a high-wire course, a ski slope and developments at Dumfries House being dominant in terms of square metres approved.

4.6.5. Applications for two significant leisure/assembly developments were refused within the 2012 to 2019 period, both of which due to a lack of an adequate sequential assessment on the part of the respective applicants that could conclusively rule out location in a town or edge of centre locations.

FIGURE 65. NUMBER OF APPROVED NEW ASSEMBLY AND LEISURE DEVELOPMENTS (2012 TO 2019) IN M2
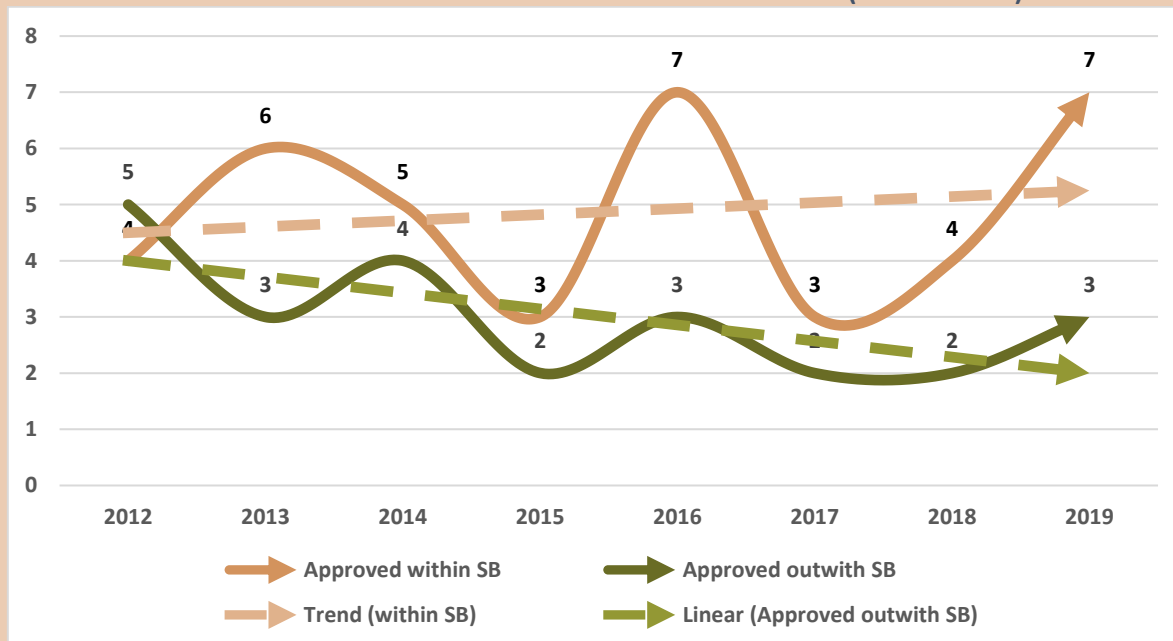
SOURCE: EAC MONITORING. NEW, NON-RETROSPECTIVE, PERMANENT AND NON-MINOR DEVELOPMENTS ONLY.

4.6.6. **Main issues emerging** – Demand for tourist accommodation and facilities is buoyant and rising and tourist policy appears to perform well other than a requirement for some slight changes to wording. The development in the tourism industry in the area is extremely important and any increase in approvals of tourist accommodation in the years ahead will provide evidence of an improvement in the market. New accommodation has largely been located out with settlement boundaries, however, and more may have to be done to encourage location in towns and villages. *These issues should be taken forward in LDP2*

4.7. Delivering Renewable Energy

'This plan assists in delivering the Scottish Government's renewable energy targets by helping to ensure that, in land use planning terms, East Ayrshire's full potential for electricity and heat from renewable sources is achieved taking into account the potential environmental, community and cumulative impacts of such developments.' – LDP

Has the East Ayrshire LDP achieved growth in the renewables sector?

4.7.1. **Introduction** – It is considered that renewable energy policy as it exists in the LDP could be substantially rewritten and restructured, particularly around the use of a carbon calculator, biodiversity and sustainable development. There are also concerns that a balance needs to be struck between supporting renewable energy and preserving the quality of the natural environment, particular in the southern part of East Ayrshire where pressure for wind farms has been significant during the monitoring period.

4.7.2. **Parts of East Ayrshire may be experiencing wind farm saturation** – Questions need to be considered in terms of whether East Ayrshire, particularly the south, can continue to accommodate wind energy development. The large number of applications have been robustly assessed, however, it is felt that some areas are now experiencing a saturation of development. A stronger emphasis on the protection of quality and protected landscapes would ensure that development does not come at the detriment of the natural environment.

4.7.3. **Policy OP1 of the LDP is too prescriptive of sustainable development** - The layout of OP1 suggests that sustainable development is acceptable in all its forms. A rewording or restructuring of the policy to create a two stage process would oblige proposed developments to first comply with the existing criteria and then, should they be exhausted, to be assessed in terms of their contribution to sustainability.

4.7.4. **A dedicated policy covering biodiversity is necessary** – The Planning Act (Scotland) 2019 has biodiversity as a key policy concern. As such, it is important that LDP2 contains a section covering biodiversity, particularly given its importance from the perspective of wind farm development.

4.7.5. **A review of all policies is necessary** – The current policy framework draws substantially from SPP, however, certain aspects depart from the structure and emphasis of the national policy. The review of the SPP will be critical to how wind energy policies are taken forward in LDP2.

4.7.6. **The carbon calculator is useful but must be appropriately used** – The carbon calculator is a useful tool in determining the release of carbon through development against the reduction in carbon emissions achieved through new renewable energy production.

4.7.7. **Main issues emerging –** A review of the renewable energy section is required, particularly given the high level of development that has come forward since 2017 and in the context of the ongoing review of SPP. The Ayrshire Growth Deal and the NERD project will be key issues to consider in the MIR. ***These issues should be taken forward in LDP2.***

4.8.   Promoting Sustainable Transport

'East Ayrshire's vision of a buoyant and sustainable economy relies on efficient transportation links, but it will also be partly achieved through the careful siting of new development opportunities in locations which are easily accessible by a range of transportation modes as well as encouraging the movement of more freight by rail' – LDP

Has the LDP encouraged sustainable modes of transport?

4.8.1. **Introduction** – Whilst development has largely taken place within locations easily accessible by a range of transportation modes, some approved housing developments have not and will encourage the use of cars. Furthermore, certain parts of the road network are under pressure, notably in Kilmarnock. A study is underway however to identify means of improving the Bellfield interchange.

4.8.2. **Housing development has and will largely take place within settlement boundaries** – Most housing development is programmed to take place within allocated sites that fall within settlement boundaries and have access to public transport and active travel links. Some housing developments that are to take place will not be built in such locations, however, and Policy currently allows extension in the countryside of exiting settlements in certain circumstances. It is intended therefore that LDP2 will focus on ensuring that development takes place in the right location in future.

4.8.3. **Certain parts of the road network remain under pressure** – A commitment to upgrade and improve the Bellfield Interchange was made in the LDP. Ameliorating the traffic situation in the area would improve movement through the junction but also unlock land to the east that is earmarked for future growth. A report published in 2018, Bellfield Interchange Stage 1, proposed three options: one with partial signalling on the roundabout, one with full signalling on the roundabout and another with majority signalling on the roundabout. Work on a Stage 2 report with more concrete details of suggested upgrading is ongoing.

4.8.4. **Main issues emerging** – Congestion problems at the Bellfield Interchange remain the key transport issue in East Ayrshire and incidents at the junction have attracted substantial media attention. Work on identifying a solution is ongoing and the upgrade of the junction will form a key part of the MIR. Housing developments are not always taking place in accessible locations and policy regarding extensions to settlements will be reinforced in LDP2 as part of the fundamental review of the rural housing policies. *These issues should be taken forward in LDP2.*

4.9.   Delivering Infrastructure

'All new development should be fully integrated with, and served by, existing infrastructure and where this is not possible, new infrastructure requirements should be highlighted at an early stage so that ways of providing them can be identified. Developers may also be required to make contributions to additional projects as set out in the developer contributions section.' – LDP

Has the LDP achieved infrastructure improvements?

4.9.1.   **Introduction** – Substantial improvements to telecommunications infrastructure have been made in East Ayrshire, notably relating to the rollout of the DSSB superfast broadband programme. Development of telecommunications infrastructure has been carefully managed and proposals have been rejected or recommended for withdrawal when they do not respect the built environment. It is anticipated that the R100 programme will ensure that everyone in East Ayrshire is able to access high speed broadband. Developer contributions provided by applicants are low by national standards and it is intended that a redrawing of the contributions framework to help provide better infrastructure for communities will be a priority of LDP2. Green infrastructure policy is clearly set out in the Plan, however, there could be merit in a more flexible approach.

4.9.2.   **A robust approach has been taken to determining telecommunications applications** – An application for a DSLAM cabinet in Ochiltree was refused as it would have had an adverse impact on the appearance of the Conservation Area in the settlement. A far greater number of telecommunications applications were approved, however, and doing so has enabled the Council area to improve its digital connectivity. In general, DSLAM cabinets and other telecoms applications have been approved and have aided both commercial and DSSB superfast broadband rollout.

FIGURE 66. APPROVALS OF TELECOMMUNICATIONS INFRASTRUCTURE (2012 TO 2019)
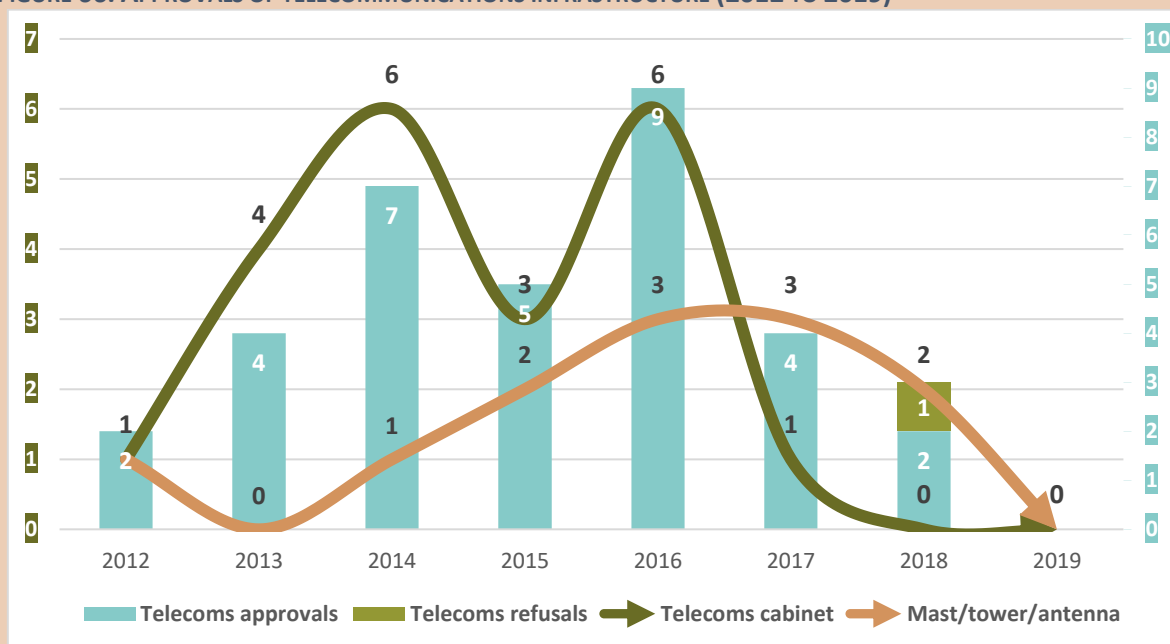
4.9.3. **The Council has helped to roll out of DSSB and R100** - The planning service has worked closely with its partners to ensure the effective rollout of the Scottish Government's Digital Scotland Superfast Broadband (DSSB) programme, which aims to allow 95% of the Council area to connect to superfast fibre broadband. This target has now been achieved, 97.4% of properties were covered by early 2018 and more thereafter. The close working partnership achieved so far will continue as the Scottish Government rolls out its R100 or Reaching 100% programme. Kilmarnock and the immediately surrounding area are to be targeted for the Openreach Fibre First programme, enabling more homes to connect to full fibre and ensuring very high broadband speeds.

FIGURE 67. INSTALLATION OF DSSB FIBRE BROADBAND INFRASTRUCTURE

SOURCE: ROBERT YOUNG - SCOTTISH GOVERNMENT

4.9.4. **Developer contributions payments have been modest** – Developer contributions payments in East Ayrshire are small by the standards of many Scottish Local Authorities and the total sum gathered to date has been relatively limited. Less money has been gathered under LDP 2017 than was the case under the previous Local Plan. It is therefore considered that a restructuring of the developer contributions framework should be undertaken for LDP2 in order to make the most of new development and provide the essential services and improvements communities require.

4.9.5. **Green infrastructure policy could be modified** – All new housing developments between 10 and 200 units must be located within 150m of designated open space if there is a surplus within the settlement within which they would take place. Otherwise developments must provide onsite space. Whilst this space has usually been provided, it is considered that such a buffer is perhaps too stringent and that the limit could be extended in order to make some sites more viable. All developments of homes must provide 20sqm of amenity space per

dwelling. Whilst there is a degree of leniency when this is applied to smaller sites, it is considered to be burdensome and it is suggested that a limit of 3 or 4 homes may be applied to make smaller developments more viable.

4.9.6. **Main issues emerging** - Developer contributions guidance requires to be updated to account for changes to school rolls, as well as medical and infrastructure requirements in Kilmarnock and Loudoun and to achieve more realistic contributions from developers. Green infrastructure policy could also be reviewed to allow for flexibility and to ensure quality spaces are provided. *These issues should be taken forward in LDP2.*

4.10. Sustainable Waste Management

'This LDP encourages economic development through the establishment of new business and industry relating to waste, whilst at the same time provides policy to ensure that the amenity of our residents, settlements and natural environment are not compromised in any way by the development of new or extended waste management facilities.' – LDP

Has the LDP supported the waste management industry?

4.10.1. **Introduction** – A revolution in waste management is underway, whereby more waste is being recycled and less is to be sent to landfill. Various sites are being restored and a large material recovery facility at the former Killoch Colliery was approved in 2017. The LDP contains a significant number of waste management policies, which should be reviewed, and if possible, condensed or amalgamated.

4.10.2. **Waste management sites are being restored** – Eight waste management sites are safeguarded in the LDP, at Underwood Depot in Cumnock, Dunniflats by Lugton, Gauchalland Roads Depot in Galston, Garlaff in Skares and Western Road, Southhook Road, Moorfield Industrial Estate and Burnside street in Kilmarnock. Landfill at Milton near Kilmarnock ceased in 2014 with the lease terminated and site returned to the landowner. The Council continues to monitor the Milton site and reports to SEPA. No applications for change of use have been received at Dunniflats of Gauchalland Road and both remain in operation as depots. An application to amend a restoration scheme at the Garlaff site was received in 2019 and was being considered as of November 2019. Albeit to a lesser extent than was the case in the past, it will continue to be in use for landfill or waste management purposes for the foreseeable future.

4.10.3. **Waste management development has been approved** – There have been few applications for waste management facilities, either before the adoption of the LDP or since. Improvements to the Garlaff site were approved in 2018, however, the site was approved to be restored in 2019. An application by Barr Environmental Limited to develop a material recovery facility (MRF) at the former Killoch Colliery was approved in summer 2017. Work on the development has yet to take place. The approved development would not take place within an LDP-allocated waste management site, however, the development accords with waste management policy.

4.10.4. **Waste management policies could be merged** – The LDP includes 8 separate policies covering the management of waste. Whilst guidance is comprehensive, some areas are the responsibility of other parts of the Council and consideration should be given to removing these to put in place and more concise and straightforward policy framework. A consolidation of the most relevant aspects of waste management matters would produce a more succinct policy.

4.10.5. **Main issues emerging** – One waste management site (Garlaff) is no longer in use for landfill purposes and the number of waste management policies in use could be reduced or combined. The nature of waste management is changing and there is a greater emphasis on recycling. The Scottish Government will ban on landfilling biodegradable municipal waste from 2021 and it is therefore the case that less landfill space may be required in the future. *These issues should be taken forward in LDP2.*

4.11. Environment

'By protecting and enhancing our environment in an effective and meaningful way, we are better able to create successful places which, in turn, attract investment, new visitors and contribute significantly to the quality of life for local residents. The plan promotes development of these assets and their surroundings in a sustainable manner and protects those most sensitive features from inappropriate development.' – LDP

Has the LDP protected and enhanced the natural and built environment?

4.11.1. Introduction – Much has been achieved in East Ayrshire to improve and preserve the environment. Listed Buildings have been restored and protected and conservation areas have also been afforded protection. The Coalfield Environment Initiative (CEI) has restored wetlands and peatlands, development in Gardens and Designed Landscapes has been managed and developments in designated landscape areas have been few in number. Flooding is and will affect the deliverability of many sites however and some LDP policies will have to be revised.

4.11.2. The restoration of Listed Buildings has been supported – There are 21 fewer listed Buildings at Risk in 2019 than in 2010. Some of this reduction has been achieved through the efforts of the CARS scheme, with the restoration of listed dwellings in Dalmellington having been completed in summer 2019 and has been supported by policy ENV1 – Listed Buildings, which encourages sensitive re-use.

4.11.3. Listed Buildings have been protected – Whilst the vast majority of listed building applications have been approved during the monitoring period, 20 were refused. The majority of these were rejected because of the adverse impact proposed development would have on the appearance of the buildings and their surroundings. Impediment to pedestrian movement, safety issues and the loss of historically significant structures were also factors in applications being declined. Three appeals were allowed during the time period and one dismissed.

FIGURE 68. APPROVALS, REFUSALS AND WITHDRAWALS OF LISTED BUILDING APPLICATIONS (2014 TO 2019)

EAC MONITORING
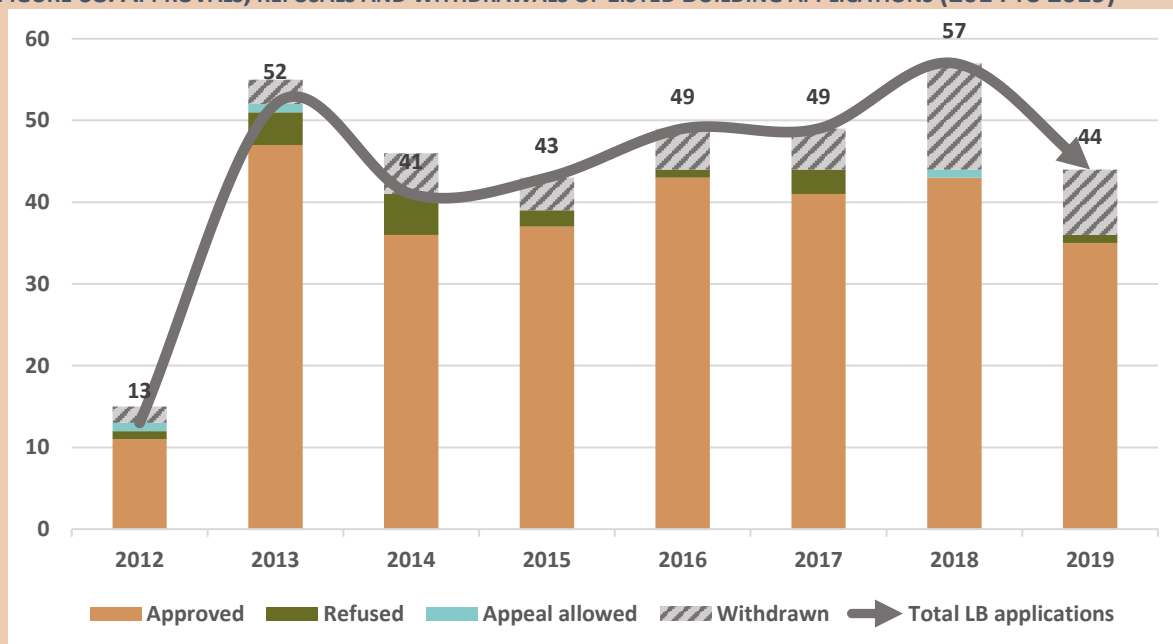
4.11.4. Conservation Areas have been protected – Conservation Area applications have been few in number in recent years and the majority have been approved. Several applications were subsequently withdrawn, however, a single application was refused on the grounds that substantial demolition of buildings would have an adverse impact on the appearance of the area in which it would take place.

SOURCE: EAC MONITORING

4.11.5. Historic battlefield policy could be merged with a wider policy – The sole historic battlefield in East Ayrshire is listed in the Inventory of Historic Battlefields in Scotland; the Battle of Loudoun Hill. Whilst quarrying has taken place within the boundary of the battlefield, there have been no major applications since the adoption of the LDP in 2017, the most recent being in 2018 when an application for a house was approved after consultation with Historic Environment Scotland (HES). The provisions of policy ENV5: Historic Battlefields could therefore be combined in a new policy including natural, built and cultural heritage features.

4.11.6. Trees covered by TPOs have been protected – The 2017 EALDP states that the Council will support the retention of individual trees, hedgerows and woodlands within both settlements and rural areas, where such trees contribute to the amenity, nature conservation and landscape value of the area; the 2010 Local Plan had a similar policy. A robust and pragmatic approach has been taken whereby a majority of applications for works to or removal of trees covered by Tree Protection Orders (TPO) have been approved in order to allow for the progression of development, because doing so was in the interests of safety, because specimens were diseased or damaged and preservation was impossible and for various other reasons. One application was refused on the basis that removal of specimens would have a negative impact on the immediate and surrounding environment.

FIGURE 70. APPROVALS, REFUSALS AND WITHDRAWALS OF TPO APPLICATIONS (2012 TO 2019)
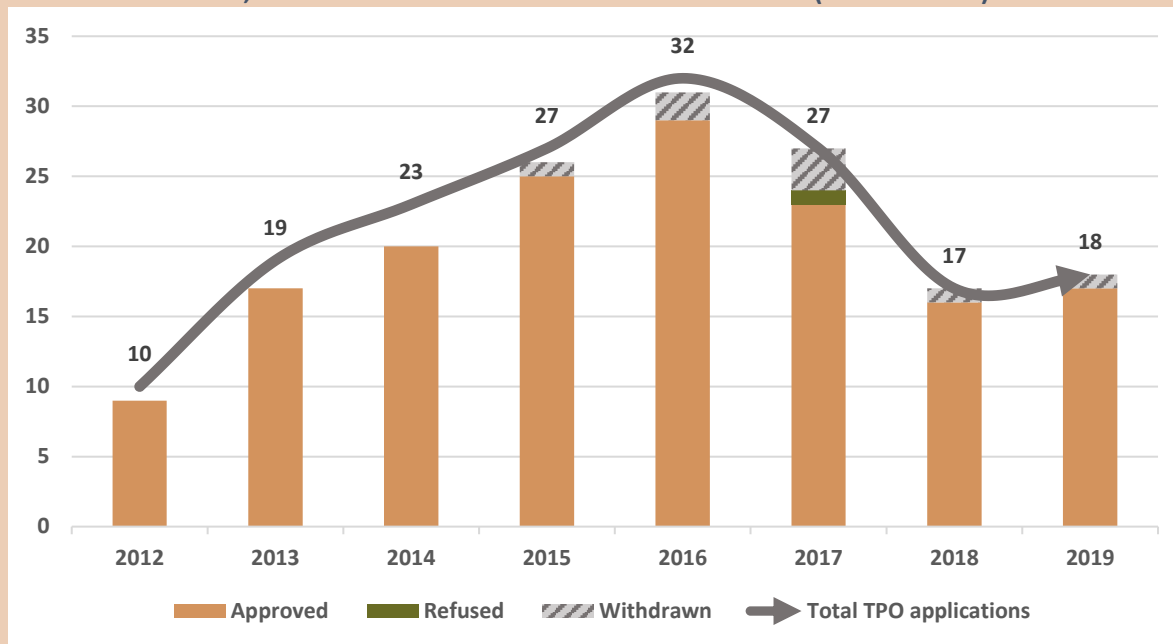
SOURCE: EAC MONITORING

4.11.7. **The CEI has restored peatlands –** Since 2013, the East Ayrshire Coalfield Environment Initiative (CEI) and partners have implemented 609 hectares of priority habitat enhancement projects across a network of peat bogs in the former Cumnock and Doon Valley. This work has been fully supported by the Council and LDP policy ENV10 – Carbon rich soils.

4.11.8. **Flooding affects the deliverability of development** – Substantial parts of East Ayrshire are affected by potential and active flooding. Whilst policy ENV11 – Flood Prevention is robust subject to an update to account for the latest SEPA data, flooding is preventing the development of a large number of sites, notably in the centre of Kilmarnock. SEPA has objected to two developments in Kilmarnock town centre in the last three years, at Douglas Street and Titchfield Street and is likely to take a similar stance in future. Early engagement with SEPA to aid the preparation of the MIR and SEA is underway and it is intended that close working will identify measures to alleviate identified risks.

4.11.9. **Work is underway to address flooding** - East Ayrshire is covered by 2 Flood Risk Management Plans. The strategies for the majority of watercourses in East Ayrshire are contained in Local Plan District 12: (Ayrshire) and LPD 14: Solway. The Council is required to undertake flood protection works in area 14, and complete flood studies in area 12 before June 2022. The conclusions of these studies will inform future planning policy and proposals for all of the areas that are liable to flooding within the next Local Development Plan. These will be considered before any flood protection works commence on site.

4.11.10. **Development in Gardens and Designed Landscapes has been managed** – The most prominent example of the Council's commitment to protecting the integrity of gardens and designed landscapes was the refusal in 2019 by the Council and the DPEA of permission to undertake a residential and leisure development at Loudoun Castle. The majority of the policies set out in the LDP proved to be robust and it was determined by both authorities that the proposed development would have a negative impact on the castle and its estate. Work

to restore Dumfries House and its Designed Landscape to restore it to as close to its original appearance as possible has been ongoing for the past decade and applications approved have been in line with the requirements of the various designations in place to protect the buildings and their setting. An observatory at the Craigengillan designed landscape was approved in 2010. Small-scale developments within the other gardens and designed landscapes found in the area have been approved in recent years.

4.11.11. **Developments in designated landscape areas have been limited in number** – Recent development at the Council's two Special Areas of Conservation at Airds Moss has been in the form of overhead line installation in the south-east of the Area in 2017 and 2019, one classed as permitted development and the other prompting a consultation response that raised no objections from the planning service. No applications have been received at Merrick Kells. Development within the sole Special Protection Area, Muirkirk and North Lowther Uplands, has been limited to opencast restoration and limited wind farm related work. SNH undertakes a programme of monitoring to establish any changes to the quality of the designations that may be taking place.

4.11.12. The 20 Sites of Special Scientific Interest (SSSI) in East Ayrshire vary significantly in area and include Muirkirk Uplands at 19,154ha and Howford Bridge at 6.13ha. Each SSSI is afforded the same level of legal protection. The Muirkirk Uplands covers the same area as the Muirkirk and North Lowther Uplands SAC. A wind farm development at Hare Hill was pending decision as of May 2020 and intersects the small Fountainhead SSSI. An application to extract coal at an area including the Benbeoch SSSI deemed not to raise issues of national interest was withdrawn in 2016. It is therefore the case that the impact of development on the SSSIs has been limited to a few prominent cases.

4.11.13. **Main issues emerging** – Few issues have emerged from this theme and suite of policies and they are considered to function well. A more prominent place in the plan would ensure that they are at the forefront when assessing applications. Historic battlefield policy is applicable to a single battlefield and could be merged with another, related policy. Flooding is not a policy-specific problem but is constraining development and the Council should work closely with SEPA to develop steps towards the alleviation of identified flood risk. *These issues should be taken forward in LDP2.*

5. Summary of Main Issues

5.1.1. A number of key issues has been raised in this document; these are listed below. Whilst not every issue listed will be considered in the Main Issues Report, each will be assessed as part of the preparation of LDP2. They are as follows:

FIGURE 71. SUMMARY OF MAIN ISSUES

Topic	Main Issues
Vision and Spatial Strategy/Placemaking	• Uneven level of development between North and South • Development taking place outside of settlement boundaries • Need to extend the Rural Protection Area (RPA) • Place-based focus of Planning Act 2019 (Local Place Plans) • Pressure on services/infrastructure in Stewarton • Areas in need of redevelopment (South Central Kilmarnock and others)
Enabling new housing	• Number of homes being delivered in Cumnock and the Doon Valley falls short of the requirements of the Housing Supply Target (HST) • Some allocations subject to constraints and should be reviewed • 1 in 200 year pluvial and fluvial flood risk (SEPA) • Enabling development policy to be revised • RES2 may have to be rewritten to stipulate circumstances when residential extensions to settlements are suitable
Successful town centres	• An increase in vacancy rates in some town centres • Continuation of town centre living boundaries to be reviewed • Few town centre living applications • Footfall generating uses being developed outwith town centres
Revitalising our economy	• Take up of land at some business and industrial locations has been limited in places • Business and industrial uses taking place in the open countryside • A review of detailed policy wording may be necessary
Promoting tourism	• Tourism-related development (including tourist accommodation) is often taking place outside of settlement boundaries
Delivering renewable energy	• Policies to be reviewed and potentially merged • The NERD project, part of the Ayrshire Growth Deal, emerged as a new issue
Promoting sustainable transport	• The Bellfield Interchange remains congested • Development not always taking place in accessible locations
Delivering infrastructure	• The developer contributions regime requires redesign • Green infrastructure requirements to be reviewed
Sustainable waste management	• Waste management policies could be reduced or combined • Less demand for landfill space and emphasis on recycling
Environment	• Some policies could be merged • The policies could have a more prominent place in the plan • Closer work with SEPA to unlock constrained land • Open space policy could be rewritten • Flooding is an issue

6. Potential Policy Development for LDP2

6.1. The previous section considered the overall effect on East Ayrshire's population, economy, environment and infrastructure, over defined periods, as identified through statistical analysis of broad trends and the performance of key LDP 2017 policies based on a range of identified outputs/outcomes. This section looks more closely at the individual policies of the current Local Development Plan.

6.2. The plan has been adopted for approximately three years and it is therefore appropriate to adopt a 'light touch' review of policy performance due to the brevity of policy implementation. It provides a brief commentary on whether the policies are successfully managing proposals to deliver sustainable development, if there are emerging issues in seeking to apply policy, and whether the changing policy landscape has highlighted a need for modifications to the current policy suite.

6.3. This review will form a basis for further, more detailed discussions regarding the potential future evolution of LDP 2. Future potential policy approaches will be further informed by the engagement on issues and options identified in the LDP 2 Main Issues Report and an Interim Environmental Report.

6.4. The policy review highlights **potential** proposals for LDP2 by providing an initial policy position statement. Suggestions were gathered through engagement between the Development Planning and Regeneration and Development Management teams. **More information on each individual policy can be seen in East Ayrshire Local Development Plan Volume 1: Strategy and Policy.**

FIGURE 72. POTENTIAL POLICY DEVELOPMENT FOR LDP2

Policy	New or modified for LDP 2017	Descriptor	Performance commentary	Potential LDP 2 Action
Overarching Policy OP1: Overarching policy	New	The purpose of the policy is to provide a framework for assessing the potential contribution to sustainable development made by development proposals in the context of relevant policies in the LDP and SPP.	This policy duplicates aspects of other policies in the plan and that any details from OP1 should be included in each separate policy. It is however useful when assessing householder applications and ensures there is a consistent approach to what is required of all development proposals across East Ayrshire. The policy could be changed to	ALTER – Alter to more fully consider the contribution made by sustainable development.

Policy	New or modified for LDP 2017	Descriptor	Performance commentary	Potential LDP 2 Action
			create two sections – one with the list of criteria and, if these have not been met, then a consideration of a proposed development's sustainability is made.	
Overarching Policy OP2: Implementation of the SEA Environmental Report	New	The purpose of the policy is to ensure that the mitigation and enhancement measures contained within the site assessments in the Environmental Report are implemented by Developers.	OP2 is said to be rarely used but continuation of the policy is deemed necessary to ensure the detailed measures set out in the Environmental report are taken on board. LDP 2 is covered by the Environmental Assessment (Scotland) Act 2005. All likely significant environmental effects of the plan will be identified, opportunities to avoid adverse impacts will be sought and positive ones enhanced. Those with an interest or may be likely to be affected by the plan or programme are provided an opportunity to have their views taken into account.	**ALTER** – Include more preamble with detailed policy following afterwards.
Placemaking maps for Prime, Strategic and Service Centre town centres. Kilmarnock, Cumnock, Stewarton, Galston and Dalmellington.	New	The maps are a spatial expression of the Placemaking elements of SPP, and the Scottish Government's policy guidance - Designing Streets and the Council's Design Guidance. They embody the 6 qualities of	Key attribute: *Protect the landscape setting of the town* – policy currently provides no protection to landscape setting through reference to evidence base or requirements for Landscape and Visual Impact Assessment (LVIA).	**ALTER** - Consider the need to amend policy guidance.

Policy	New or modified for LDP 2017	Descriptor	Performance commentary	Potential LDP 2 Action
		place attributed to successful placemaking.		
Policy RES1: New Housing Developments	Mod	The policy directs new housing developments to identified housing sites within the LDP or appropriate sites within the settlement boundaries.	The policy is said to be rarely used by Development Management and there is duplication with policy INF4. It is however useful as a means of setting out the overall approach to housing development and guiding development to appropriate locations.	**ALTER** - Include more details in the preamble and consider long term perspective. Remove statement on 'future housing growth'.
Policy RES 2: Residential extensions to settlements	New	The policy sets out the specific circumstances by which an extension to the land supply out with settlement boundaries may be permissible.	The issue of 'clustering' has become apparent in certain areas since the adoption of the Plan and the proximity of settlement boundaries to small groups of housing has allowed developers to make use of the policy. There is also a lack of clarity over what constitutes a lack of land supply.	**ALTER** - A review of settlement boundaries will be necessary to expand settlements and allow for development within them (on white land if necessary).
Policy RES 3: Affordable Housing	New	The policy sets out the requirements for providing affordable housing and directs new affordable developments to identified housing sites within the local plan or within sites which are within the relevant sub market areas.	Developers have largely complied with the policy. There has however been a prominent example of a developer using a commuted payment to avoid providing homes and ensuing legal problems surrounding payment.	**ALTER** - Remove the possibility of developers paying a commuted sum from the plan and ensure that affordable housing is provided on site.
Policy RES 4: Housing in the	Mod	The policy sets out the criteria against which housing in the Rural	The policy cross references others in places. Mapping of the RPA (and RDA) is difficult to interpret and boundary often falls halfway	**ALTER** - Update mapping to improve interpretation. Potentially use SNH LCA's to define areas of land. More

Policy	New or modified for LDP 2017	Descriptor	Performance commentary	Potential LDP 2 Action
Rural Protection Area		Protection Area may be permissible.	through existing settlements. A robust methodology is required to accurately define land type. Much of the land in the north is not classified as RDA yet sites in the south lack services but housing is being provided. It is possible to develop replacement homes on any other site and not necessarily within the site of the house to be replaced.	detail will be required to support and explain the policy, possibly by means of better supporting documents or preamble. There is a potential to identify pockets of land within or attached to existing clusters, classify them as Rural Groupings (possibly as Supplementary Guidance) and make the remainder of RES4 more prescriptive. Ensure that replacement homes are developed on the same site as homes to be replaced. The overall approach to housing in the countryside will be explored in the MIR.
Policy RES 5: Housing in the Rural Diversification Area	Mod	The policy sets out the criteria against which housing in the Rural Diversification Area may be permissible.	It has been suggested that the restriction to the development of a minimum of 0.25ha brownfield land (iii) and the requirement for one house on each is too inflexible.	**ALTER** – A more discretional approach to potential developed area may be necessary, either less than 0.25ha or based on circumstances. A review of the definition of brownfield may also be necessary. Potential deletion of section (ii).
Policy RES 6: Housing for Agricultural Workers: Rural Protection Area and Rural	Mod	The policy sets out the criteria against which housing for agricultural workers in the Rural Diversification Area and Rural Protection Area may be permissible.	It is no longer possible to apply conditions as per Scottish Government circular. No mention of scale/design is made.	**ALTER** – Alongside the requirement for a detailed business case, an assessment of the design and size of the proposed dwelling should be made to ensure it is of a size and scale appropriate for a farm worker.

Policy	New or modified for LDP 2017	Descriptor	Performance commentary	Potential LDP 2 Action
Diversification Area				
Policy RES 7: Housing for Other Rural Enterprises: Rural Protection Area and Rural Diversification Area	Mod	This Policy sets out the criteria against which applications for Housing associated with rural enterprises in the Rural Diversification Area and Rural Protection Area may be permissible. Schemes will only be considered for those proposals which accord with Policy RES 5 and Policy IND 4.	Generally remains appropriate. It is however no longer possible to apply conditions as per the Scottish Government circular.	ALTER - Alongside the requirement for a detailed business case, an assessment of the design and size of the proposed dwelling should be made. Combine forestry element of policy with RES6.
Policy RES 8: Rural Housing Development	New	The policy restricts residential development in rural areas and applies certain criteria.	The policy (ii) is considered to be too general and is already covered by aspects of RES4 and RES5.	REMOVE - Consider removing the policy or amalgamating relevant elements with other housing in the countryside policies. Consider introducing spatial limitations to very rural areas only.
Policy RES 9: Conversions to Residential Use	Mod	This Policy sets out the criteria against which applications for conversions to residential use may be permissible.	The policy is deemed to be useful in terms of the 50% extension to buildings criterion. Wording could be altered to include an expanded range of buildings that might benefit from appropriate conversions in rural areas, e.g. Buildings at Risk. There is also uncertainty as to what constitutes 'traditional' design.	ALTER – Cut down wording and remove difference between rural and other areas and what represents traditional design.

Policy	New or modified for LDP 2017	Descriptor	Performance commentary	Potential LDP 2 Action
Policy RES 10: Gypsy Travellers' Sites	Mod	This Policy sets out the criteria against which applications for Gypsy Travellers sites may be permissible.	No site has been identified yet and no progress made. This is however not the responsibility of the planning service.	**RETAIN**
Policy RES 11: Residential Amenity	Mod	This Policy states the Councils intention to protect residential amenity form inappropriate development.	Paragraph (i) is vague as to what would constitute a detrimental use. Open space within residential areas has been under pressure from development. Householder applications are not covered by the policy.	**ALTER** – Clarify paragraph (i) to include criteria of detrimental uses. Open space may require greater safeguarding against ad hoc development. Consider the need to link policies regarding Residential Amenity RES 11, Open Space/ Green Infrastructure INF 4, and Safeguarded Open Space INF 6.
Policy RES 12: Non-Permanent Dwellings	Carried over	This Policy sets out the criteria against which the use of caravans and non-permanent dwellings on sites other than those specifically authorised for such purposes will not be permitted. The policy also sets out the criteria against which applications for temporary consent may be permitted.	This policy is said by Development Management to be rarely used and it is felt that the details could be split amongst other policies.	**REMOVE** – Add relevant elements to other policies, including two years proof.
RES 13: Enabling Development	Mod	This policy sets out the criteria against which enabling development may	Continuation of policy deemed necessary.	**ALTER** – Potentially include a wider range of listed buildings or buildings identified as having value in a

Policy	New or modified for LDP 2017	Descriptor	Performance commentary	Potential LDP 2 Action
		be considered an appropriate means of preventing the loss of and securing the long term of large listed residential or institutional buildings located within their own grounds.		Conservation Area appraisal that might be saved from loss by enabling development. Potentially allow for other uses that might support such a development other than solely new homes.
Policy TC1: Supporting development in town centres	Mod	This Policy sets out the criteria against which a wide range of potential uses in town centres may be permissible.	Wording of the policy should be reviewed to ensure it keeps up with current trends and remains fit for purpose. There is an issue of gyms for example being located in business parks which may be encouraged due to them not engendering vitality. Review of town centre boundaries to be undertaken – area of some does not reflect 'true' extent of town centre uses.	**ALTER** – Review town centre boundaries and change description to support any uses that could would not have an adverse impact on town centres. Remove criteria (i) 'Vitality and viability of the town centre'.
Policy TC2: Footfall generating uses outside of town centres	Mod	This Policy sets out the criteria against which a wide range of defined footfall generating uses proposing to locate outside of town centres may be permissible.	Continuation of policy deemed necessary. Policy performance deemed effective.	**RETAIN**
Policy TC3 Small scale retail development in	Mod	This Policy sets out the criteria against which small scale Class 1 retail	Continuation of policy deemed necessary. Policy performance deemed effective.	**ALTER** – Could also include support for community uses in such locations.

Policy	New or modified for LDP 2017	Descriptor	Performance commentary	Potential LDP 2 Action
out of centre locations		development outside of the network of centres proposing to locate in out of centre locations may be permissible.		
Policy TC4: Town Centre Living	New	The policy is aimed at supporting residential uses within town centres, and for Kilmarnock and Cumnock, within defined 'town centre living' boundaries.	The policy only applies to Kilmarnock and Cumnock and is deemed to have been of limited value. Town Centre living can be supported through other strategies and policies of the Plan.	REMOVE
Policy TC5: Improving town centre environments	Mod	The proposal is aimed at supporting improvements to town centre environments.	This work is carried out as a matter of course and is predominantly undertaken by the Council.	REMOVE
Policy TC6: Food and Drink, Public houses, licensed clubs and hot food takeaways	Mod	This Policy sets out the criteria against which applications for Food and Drink, Pubs, licensed clubs and hot-food takeaways may be permissible. All consents will be directed to town centres.	The policy is narrow and perhaps not necessary.	REMOVE – Explore whether it would be practical to include relevant aspects of this policy in TC2/TC3. Define what constitutes 'over-concentration' and guide development to where most appropriate.
Policy IND 1: Strategic Business Locations	Mod	This Policy sets out the criteria against which applications for defined Business, Storage and	Limited uptake of land at Strategic Business Locations since the adoption of the Plan or in recent years.	REMOVE - Review site land supply and locational facilities on offer and include in IND2.

Policy	New or modified for LDP 2017	Descriptor	Performance commentary	Potential LDP 2 Action
		Distribution uses will be directed, in the first place, to safeguarded strategic business locations. In specific instances uses may be considered in alternative locations.		
Policy IND 2: General Business and Industrial Development	Mod	This Policy sets out the criteria against which applications for business and industrial developments falling within Classes 4, 5 or 6 will be directed to those sites, outwith Strategic Business Locations, safeguarded for business and industrial use.	Has performed well and may only require to be combined with IND1.	**ALTER** – Review of identified LDP sites safeguarded for general business and industrial uses. Map differentiation between safeguarded and opportunity sites. Potentially change title to remove reference to 'General'. Potential to also accept uses on 'white' land if deemed to coexist and not be detrimental to neighbouring uses.
Policy IND 3: Business and Industrial Development in the Rural Area	Mod	This Policy sets out the criteria against which applications for business and industrial developments in the rural area may be permissible.	The current policy restricts agricultural/industrial uses and directs them to business/industrial allocations, however, there are a great deal of checks in place to ensure that environmental quality is not affected.	**ALTER** – Allow for agricultural/industrial uses if suitable in a given location; support businesses to encourage growth, increase flexibility, but retain consideration for suitability of businesses within a rural setting.
Policy IND 4: Mixed Use Sites	New	This Policy sets out the criteria against which applications seeking to locate in Mixed Use sites may be permissible.	Limited uptake of Mixed Use Sites. It is too early to determine if this type of allocation has been a success.	**ALTER** – Review of identified LDP sites designated for mixed use uptake. Possible removal of allocation type/policy.

Policy	New or modified for LDP 2017	Descriptor	Performance commentary	Potential LDP 2 Action
Policy IND 5: Alternative Use of Business and Industrial Land or Premises	Carried over	This Policy sets out the criteria against which applications seeking to reuse Business, Industrial or Commercial sites or premises, out with those safeguarded for such usage, may be permissible.	Limited alternative uptake of land designated for Business and Industrial Land or Premises. A 'significant' length of time is not defined in the policy.	**REMOVE** – Include pertinent elements in other policies, Alternatively, provide clarity over what constitutes 'significant' and encourage reuse of land that is not longer viable for business/industrial.
Policy IND 6: Working from Home	Carried over	This Policy sets out the criteria against which applications seeking to operate a business from a residential property or outbuilding may be permissible.	The policy is necessary in order to provide understanding as to what constitutes acceptable home working uses.	**RETAIN**
Policy TOUR1: Tourism Development	Modified	The policy encourages improvement of existing tourist facilities and the development of new tourism facilities.	The policy performs well and presents no problems.	**ALTER** – Remove mention of individual sites in second and third paragraphs and add 'significant' before adverse effects.
Policy TOUR 2: Tourist Accommodation	Modified	This Policy sets out the criteria against which applications for new tourist accommodation within settlement boundaries and within the rural area may be permissible.	The policy performs well and presents no problems.	**RETAIN**

Policy	New or modified for LDP 2017	Descriptor	Performance commentary	Potential LDP 2 Action
Policy TOUR 3: Rural Sporting, Leisure and Recreational Activities	Modified	This Policy sets out the criteria against which applications for sporting, leisure or recreational activities in the country side may be permissible.	More detail is required in terms of business support. The policy exclusively refers to rural areas; urban areas could benefit from similar facilities.	**ALTER** – Explore whether policy should be expanded to apply throughout the entire Plan area, not just the rural area. Add 'and buildings' after 'use of land'.
Policy TOUR 4: The Dark Sky Park	New	The policy limits any development in the park to those where lighting will not impact on the dark sky park itself and also for those developments outside the park, but within a 10 mile radius.	The policy performs well and presents no problems	**RETAIN**
Policy TOUR 5: Galloway and Southern Ayrshire Biosphere	Modified	The policy is supportive for developments and proposals that support the aims of the biosphere.	The policy performs well and presents no problems	**ALTER** – Consideration to be given to making the policy more specific and the relative to the different zones of the Biosphere.
Spatial Framework for wind energy: Schedule 1	New	Re order the list of assessment criteria so that *Cumulative impacts* is at the top of the list i.e. currently the policy guidance reads such that cumulative impacts do not apply to landscape and visual impacts.	The policy is drawn directly from SPP, performs adequately and presents few problems	**ALTER** - The framework will need to be revised in the context of the ongoing review of SPP and NPF.

Policy	New or modified for LDP 2017	Descriptor	Performance commentary	Potential LDP 2 Action
Policy RE1: Renewable Energy Developments	New	The policy is supportive of proposals for the generation and utilisation of renewable energy in the form of new build development, infrastructure or retrofit projects in standalone locations and as integral parts of new and existing developments where it can be demonstrated that there will be no unacceptable significant adverse impacts on all of the relevant Renewable Energy Assessment Criteria set out in Schedule 1 of the LDP. Furthermore, to be deemed permissible, the scale of the proposal and its relationship with the surrounding area are appropriate and that all relevant policies are met. In this regard, applications for renewable energy	This acts as an overarching, general renewable energy policy. Many aspects are covered by other policies but are useful for non-wind developments. It could potentially be shortened or made more concise. The **note** at the foot of the policy statement should be moved to the top to emphasise its importance.	**ALTER** – Reduce in size/shorten and include the **note** at the start of the text.

Policy	New or modified for LDP 2017	Descriptor	Performance commentary	Potential LDP 2 Action
		proposals should be accompanied by detailed supporting information.		
Policy RE 2: Heat Generation	New	The Policy states support for developments associated with the renewable generation of heat, and of the provision of energy centres, where appropriate, within new development. Under certain circumstances, namely that greenhouse gas emissions are significantly reduced, form part of a carbon capture development or where the applicant can demonstrate plans for conversion to renewable or low carbon sources of heat in the future, non-renewable generation of heat proposals may be permissible.	The policy is rarely used. There is a push towards heat networks and there may be interest through the NERD project. It should therefore be retained to prove if it is of use.	**RETAIN**
Policy RE3: Wind energy proposals over	New	This Policy sets out the criteria against which applications for all wind	The policy works well in most instances and should be retained. A slight rewording will be required to remove 'all' from the second	**ALTER** – Account to be taken of emerging SPP/NPF position. Reword in

Policy	New or modified for LDP 2017	Descriptor	Performance commentary	Potential LDP 2 Action
50 metres in height		energy proposals over 50m in height, including extensions and proposals for repowering, will be assessed against a spatial framework for wind development.	paragraph as it may suggest too high a test must be met. The requirement for all criteria of Schedule 1 to be met does not meet SPP and is over prescriptive. The base map should be greyscale for clarity. Rewording to move landscape and visual impacts under cumulative impacts. Rearrange criteria to comply with the order in SPP. Ensure that applicants are not assessing impacts on peat by using the carbon calculator as it does not reflect impacts on peat in all cases. A wording of 'we are not solely assessing impacts using carbon calculator' or similar may suffice.	places, change emphasis of some points and change appearance of map.
Policy RE4: Smaller scale wind energy proposals	New	This Policy sets out the criteria against which applications for all wind energy proposals less than 50m in height, may be permissible.	This policy is rarely used and is strongly tied to subsidies from government for renewable energy which have now ceased. The cut-off height of 50m is perhaps not applicable given the current market. A change in the subsidy regime may make the policy applicable in the future.	**REMOVE** – Combine with RE3 and consider the differentiation between the heights of turbines.
Policy RE5: Financial Guarantees	New	This Policy sets out the criteria against which, an appropriate financial guarantee in respect of wind energy, waste	A rewording will be necessary. Legal obligations largely do not require 'discharge' so this word may be removed. The monitoring and review of guarantees is best left to SG. An overhaul of Financial	**ALTER** – Rewording of the policy necessary, removal of mention of the monitoring of financial guarantees and later update of Supplementary Guidance.

Policy	New or modified for LDP 2017	Descriptor	Performance commentary	Potential LDP 2 Action
		management, landfill and electrical infrastructure proposals will be required to guarantee satisfactory restoration of the site by a developer.	Guarantees Supplementary Guidance may also be necessary to provide greater clarity for developers.	
Policy T1: Transportation requirements for new development	Modified	The policy seeks to ensure that developers comply with the standards of the Ayrshire Roads Alliance, Regional Transport Strategy and the Local Transport Strategy. The policy also seeks to ensure that all new development fully embraces active travel.	Much of the work associated with this generic policy is undertaken by the Ayrshire Roads Alliance (ARA)	**REMOVE** - combine with T2
Policy T2: Transport Requirements for New Significant Traffic Generating Uses	New	The policy seeks to ensure that significant travel generating developments do not increase the use of the private car.	The policy could be combined with T3	**ALTER** – take relevant elements from T1 and T3. Include transport requirement from OP1.
Policy T3: Transportation of Freight	Modified	The policy itself is aimed at supporting transport of freight by rail rather than by road, and where this is not possible, the use of off	The policy could be combined with T2	**REMOVE** – combine with T2

Policy	New or modified for LDP 2017	Descriptor	Performance commentary	Potential LDP 2 Action
		road haulage routes to avoid unnecessarily impacting settlements.		
Policy T4: Development and Protection of Core Paths and Natural Routes	Modified	The Policy states support for in developing a comprehensive local footpath and cycle route network for access and recreational use.	This policy is rarely used by Development Management and legislation is in place. It is nevertheless necessary. It is suggested that 'bridleways' are perhaps an English definition and that reference be removed.	ALTER – Provide more details, change wording and include input access to the green network.
Policy INF 1: Service Infrastructure	Modified	The Policy states support for the appropriate improvement, augmentation and expansion of existing service infrastructure that avoids detrimental impacts, and accords with all other relevant LDP policies.	The policy is deemed to be vague and service providers are already doing so.	REMOVE – But retain if legislation requires.
Policy INF 2: Installation of Next Generation Broadband for New Developments	New	This policy states the requirement to install the necessary infrastructure to enable all new premises to be connected to the existing fibre optic network, where available, and in accordance with the relevant	This policy has become obsolete, developers are largely providing services as a matter of course. It is unlikely to be grounds for refusal of a development.	REMOVE

Policy	New or modified for LDP 2017	Descriptor	Performance commentary	Potential LDP 2 Action
		telecommunications provider's standards.		
Policy INF 3: Installation of Communications Infrastructure	Modified	This Policy sets out the criteria that providers of communications equipment will be required to meet.	Permitted Development rights cover much of the criteria of this policy.	**ALTER** – Retain those aspects that are not covered by Permitted Development.
Policy INF 4: Green Infrastructure	Modified	This Policy sets out the criteria that providers of Green Infrastructure will be required to meet.	This policy was adopted in 2017. The policy and accompanying schedule ascribes open space standards to new residential development across arrange of typologies. In exceptional circumstances, technical aspects of the policy can prove challenging to implement , particularly the requirement to ensure that development takes place within 150m of open space or provide open space and a requirement of 20sqm of amenity space per dwelling regardless of development type.	**ALTER** – Review fully as part of the MIR.
Policy INF 5: Developer Contributions	Modified	This Policy sets out the criteria against which, and under certain circumstances, developers may be required to make contributions to alleviate the impacts of their	Payments gathered have been low in value and relate only to a small number of infrastructure projects.	**ALTER** – Review fully as part of the MIR. Potentially expand to include schools and medical facilities as well as infrastructure projects and increase payments dependent on site viability,

Policy	New or modified for LDP 2017	Descriptor	Performance commentary	Potential LDP 2 Action
		development on existing facilities and infrastructure.		
Policy INF 6: Safeguarded Open Space	New	This policy states the presumption against development on safeguarded open space with a possible exception for uses which are compatible with, and sympathetic to, the sporting and recreational use of the site itself.	The policy has been under scrutiny because of owners paying factoring fees for open space that is not owned by the payees.	**ALTER** – Provide more detail on Section 75, fues and titles. Review the areas highlighted the extent of safeguarded open space and consider the need to safeguard new spaces.
Policy INF 7: Outdoor Sports Facilities	Modified	This policy states a presumption against redevelopment of outdoor sports facilities notwithstanding a criteria based list of exemptive circumstances.	Section (i) is deemed by Development Management to be unnecessary and a slight rewording to afford protection to such facilities is needed to avoid their loss.	**ALTER** – Potentially combine with INF6 or include as a TOUR policy. Remove (i) and change to 'support the protection' of outdoor sports facilities.
Policy INF 8: Temporary Greening of Vacant and Derelict Land	New	The Policy states support for the temporary greening of any vacant, derelict or underused site to improve the provision of green infrastructure and to improve the character and amenity of the particular settlement or rural area.	Whilst encouraging green use of vacant and derelict land helps support biodiversity and placemaking, a specific policy may not be required.	**REMOVE** – Consider removing specific policy and include support for this as part of the approach to placemaking within the Plan.

Policy	New or modified for LDP 2017	Descriptor	Performance commentary	Potential LDP 2 Action
Policy WM 1: Sustainable Waste Management	Modified	The policy requires that all developments meet with the aims of the Zero Waste Plan and presumes against major new landfill sites.	It is considered that the waste management policies could be combined to be more succinct. Environmental Health have responsibility for much of this work.	**ALTER** – Include/combine with WM2, WM3, WM4, WM5, WM6, WM7 and WM8. Reduce a substantial amount of text to be more succinct.
Policy WM 2: Existing Waste Management Facilities	New	The policy is primarily aimed at safeguarding existing waste management sites and presuming against any new development which would compromise or inhibit the operation of these waste management facilities.	Statement could be combined with WM1.	**REMOVE** – Combine with WM1
Policy WM 3: Sustainable Waste Management and New Developments	Modified	The policy requires that development proposals provide separate waste separation and collection and also requires all major and certain significant local developments to provide site waste management plans.	Statement could be combined with WM1.	**REMOVE** – Combine with WM1
Policy WM 4: New Waste Management	Modified	The policy sets out the criteria against which proposals for new and extended waste	Statement could be combined with WM1.	**REMOVE** – Combine with WM1

Policy	New or modified for LDP 2017	Descriptor	Performance commentary	Potential LDP 2 Action
Infrastructure and Facilities		management infrastructure or facilities may be permissible.		
Policy WM 5: Further requirements for new Waste Management Facilities	Modified	The policy sets out further criteria against which proposals for new and extended waste management infrastructure or facilities may be permissible.	Statement could be combined with WM1.	**REMOVE** – Combine with WM1
Policy WM 6: Recovery or Disposal of Waste	New	The policy sets out the criteria against which proposals for recovery and/or disposal of waste, including energy recovery from waste may be permissible.	Statement could be combined with WM1.	**REMOVE** – Combine with WM1
Policy WM 7: Secondary Waste Management Industries and Businesses	Modified	The policy states support for the establishment of secondary industries and businesses associated with waste management.	Statement could be combined with WM1.	**REMOVE** – Combine with WM1
Policy WM8: Waste Collection and Mini-Recycling Facilities	Carried over	The policy states support for development of small scale centralised waste collection and mini recycling facilities within	Statement could be combined with WM1.	**REMOVE** – Combine with WM1

Policy	New or modified for LDP 2017	Descriptor	Performance commentary	Potential LDP 2 Action
		areas easily accessible to the public.		
Policy ENV1: Listed Buildings	Modified	The policy states support for the retention and preservation of all listed buildings and buildings within conservation areas and the adaption and re-use of listed buildings and buildings within conservation areas to meet modern requirements, where this can be achieved in a manner sensitive to the character of the building. The policy further sets criteria for the demolition of a listed buildings.	The policy performs well and presents no problems other than a need to respect the setting of listed buildings.	**ALTER** – Include (v) the development will not result in unacceptable impacts to the setting of a Listed Building.
Policy ENV2: Scheduled Monuments and Archaeological Resources	Modified	The policy is restrictive of any development with the potential to adversely affect Scheduled Monuments or their settings.	The policy performs well and presents no problems	**RETAIN**
Policy ENV3: Conservation Areas	Modified	The policy is restrictive of any development or demolition with the	The policy performs well and presents no problems	**RETAIN**

Policy	New or modified for LDP 2017	Descriptor	Performance commentary	Potential LDP 2 Action
		potential to adversely affect the setting of Conservation Areas and requires new build to be sympathetic to the area and, in the case of a replacement building, be of a sufficiently high quality to justify the prerequisite demolition.		
Policy ENV4: Gardens and Designed Landscapes	Modified	The policy is restrictive of any development with the potential to significantly adversely affect Gardens or Designed Landscapes included in the National Inventory, and those of regional and local importance. The policy further calls for landscape management plan, to identify conservation needs and direct how change can best be accommodated.	The policy performs well and presents no problems	**ALTER** - Do not discuss 'National Inventory'
Policy ENV5: Historic Battlefields	New	The policy is restrictive of any development that potentially may create a significant impact upon the	The policy refers to the only statutorily recognised battlefield in East Ayrshire and as such is deemed to be superfluous.	**REMOVE** – Combine with ENV2

Policy	New or modified for LDP 2017	Descriptor	Performance commentary	Potential LDP 2 Action
		key landscape characteristics and important features that underpin understanding and appreciation of the Battlefield.		
Policy ENV6: Nature Conservation	Modified	The policy is aimed at conserving nature and biodiversity from inappropriate development. Where the impacts of a proposed development on nationally or internationally significant natural heritage resources are uncertain but there is sound evidence indicating that significant irreversible damage could occur, the precautionary principle will be applied.	It is implied that the policy might only apply to rural areas. A review of provisional wildlife sites and their status will be necessary to support paragraph (iii). Update to account for the change in description to LCA. Update to account for up to date term of Local Nature Conservation Sites.	**ALTER** - Policy widened to mention urban developments, change wording and review wildlife sites.
Policy ENV 7: Wild Land and Sensitive Landscape Areas	Modified AND Wild Land text added	The policy is restrictive of any development that potentially may unacceptably impact on the protection and enhancement of designated Sensitive	Policy does not currently require any qualitative assessment of landscape impact to help inform a planning balancing judgement. Sensitive Landscape Areas are being reviewed. The SLA is very large, creating a sense of complacency and needs to be divided to account for local	**ALTER** – Change to account for Sensitive Landscape Area review, undertake rewording, separate SLA and WLA and consider a more robust assessment on the impact on WLAs and SLAs.

Policy	New or modified for LDP 2017	Descriptor	Performance commentary	Potential LDP 2 Action
		Landscape Areas or Wild Lands.	characteristics. The wording 'protect and enhance' is largely redundant and few applications have this effect. It could be reworded to 'minimising adverse impact on the SLA and support developments that protect and enhance the SLA'. It is suggested that SLAs and Wild Land Areas have the same status – they should be described and grouped separately.	
Policy ENV8: Protecting and Enhancing the Landscape	Modified	The policy is aimed at the protection and enhancement of landscape character as identified in the Ayrshire Landscape Character Assessment.	The policy performs well and presents no problems. Given its relevance to wind farm proposals some elements of the policy could be amended to improve its application to renewable energy proposals.	**ALTER** – Reword to account for wind farm development and account for LVIA.
Policy ENV9: Trees, Woodland and Forestry	Modified	The policy is aimed at the protection and retention of Trees, Woodland and Forestry. The policy supports the expansion of woodland which accords with relevant policy and allows for removal of woodland/trees only in exceptional circumstances.	The policy performs well and presents no problems. Some minor amendments may be required to improve how it is implemented.	**RETAIN**
Policy ENV10: Carbon rich soils	New	The policy is aimed at protecting carbon rich soils	The policy performs well, however, it is suggested that mention of the (carbon calculator) be removed as it causes	**ALTER** – Remove reference to carbon calculator.

Policy	New or modified for LDP 2017	Descriptor	Performance commentary	Potential LDP 2 Action
		from inappropriate development.	confusion and its status is unclear. It is suggested that a dedicated deep peat policy be created.	
Policy ENV 11: Flood Prevention	Modified	The policy is aimed at the avoidance of flooding through the protection of existing land uses, in addition to protecting Flood storage and conveying capacity, functional flood plains and undeveloped areas of medium to high flood risk. The policy implements the Flood Risk Framework as contained within SPP.	The policy performs well in terms of restricting development in flood-prone areas and is aligned with that of SPP 2014. It is however considered that development that may be desirable in certain locations is being unduly prohibited. A means of allowing for more flexibility is currently being explored.	**RETAIN** – may need revised in line the emerging SPP/NPF
Policy ENV12: Water, air and light and noise pollution	Modified and Air, Water, Noise added	The policy is aimed at avoiding development unacceptably contributing to water, air and light pollution.	The policy performs well and presents no problems	**RETAIN**
Policy ENV13: Contaminated Land	Carried over	The policy is aimed at developers proposing to develop on areas of known or suspected contaminated land to take appropriate steps to protect	Although rarely used, the policy performs well and presents no problems. Issues discussed and resolved (if applicable) by way of material considerations (consultations).	**RETAIN**

Policy	New or modified for LDP 2017	Descriptor	Performance commentary	Potential LDP 2 Action
		development from contamination and, as required, to treat or remove that contamination.		
Policy ENV 14 Low and Zero Carbon Buildings	New	The policy requires defined new development, to contribute to the carbon emissions reduction standard set by the Scottish Building Standards (2010).	The policy has presented problems in terms of the expertise within the planning teams to deal with the more technical details and the overlap with Building Standards. Retention in some from is required by legislation.	**ALTER** – Review to ensure wording of the policy is implementable.

7. Monitoring Framework

7.1.1. It is proposed that the planning service undertakes bi-annual assessments with base dates of April 1st and November 1st. The exercises will comprise of data gathering and analysis of approvals and other information in order to establish trends. The framework below is therefore proposed as a means of following a coherent pattern and allowing for accurate comparison between years and half-years:

FIGURE 73. MONITORING FRAMEWORK

Proposed Monitoring Framework				
Theme	**Information to Capture**	**Monitoring Method**	**Base Date of Check**	
Placemaking	• Placemaking maps progress	• Liaison with placemaking team	1st of April	
Housing	• All completions • Affordable completions • Housing in the RPA/RDA • Conversions to residential • Gypsy travellers sites • Enabling development	• NB2 data (financial year quarterly) • NB1 data (financial year quarterly) • Planning applications data/GGP • Planning applications data/GGP • Planning applications data/GGP • Planning applications data/GGP	1st of April 1st of April 1st of April 1st of April 1st of April 1st of April	1st of November 1st of November 1st of November
Town centres	• Approvals of retail • Approvals of other footfall generating • Town centre living • Improving town centre environments • Hot food takeaways	• Planning applications data/GGP • Planning applications data/GGP • Planning applications data/GGP • Investigation and liaison with relevant teams • Planning applications data/GGP	1st of April 1st of April 1st of April 1st of April 1st of April	1st of November 1st of November 1st of November 1st of November
Economy	• Strategic business locations/general • Business/industrial in the rural area • Mixed use sites • Alternative use of business/industry • Working from home	• Planning applications data/GGP • Planning applications data/GGP • Planning applications data/GGP • Planning applications data/GGP • Planning applications data/GGP	1st of April 1st of April 1st of April 1st of April 1st of April	1st of November 1st of November
Tourism	• Tourism development • Tourist accommodation	• Planning applications data/GGP • Planning applications data/GGP	1st of April 1st of April	1st of November 1st of November

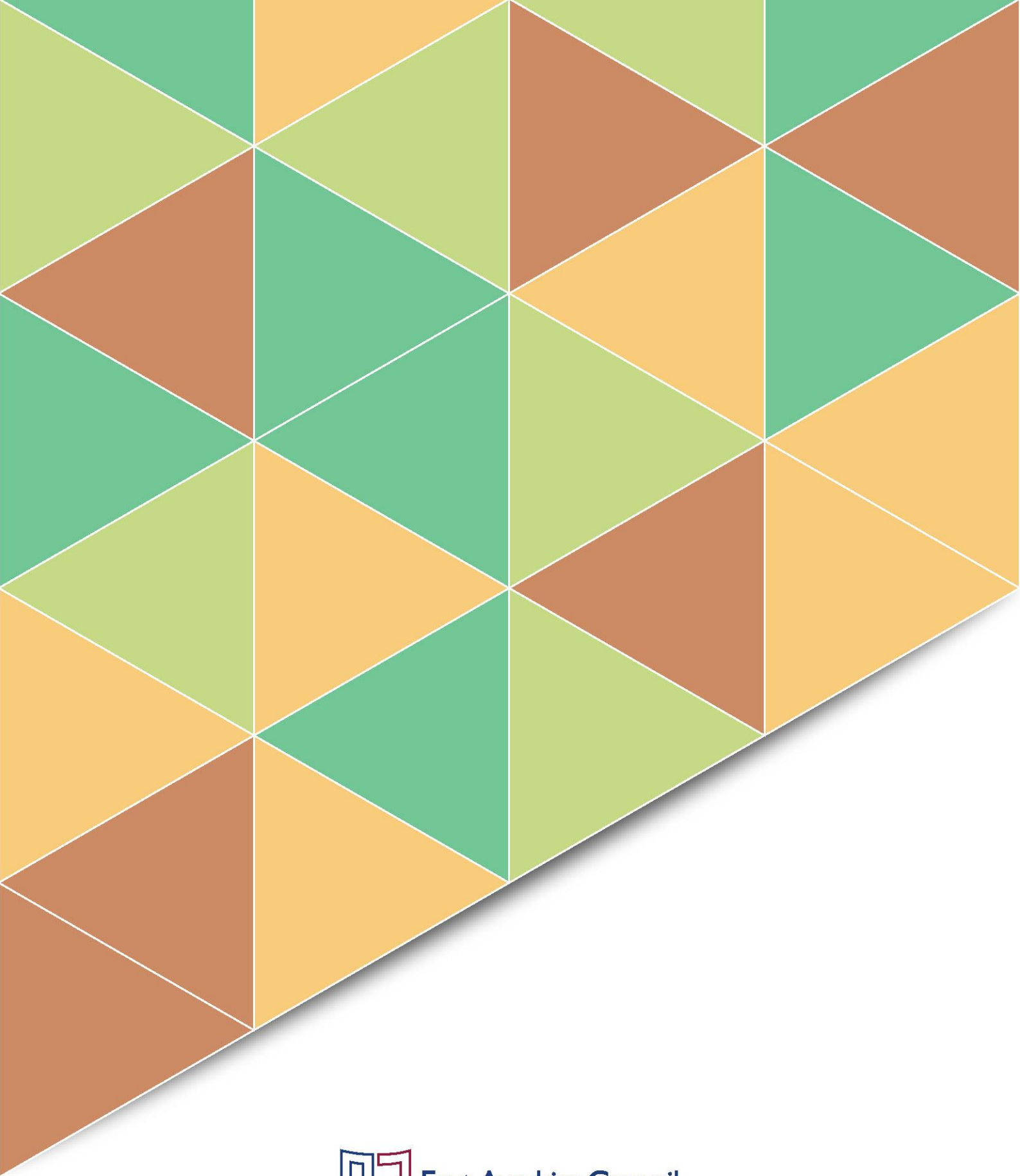|			1st of April	
Renewables	• Wind development/other renewables	• Planning applications data/GGP	1st of April	
Transport	• Transportation new developments • Transportation freight	• Planning applications data/GGP • Planning applications data/GGP	1st of April 1st of April	1st of November
Infrastructure	• Broadband/telecoms • Developer contributions • Safeguarded open space	• Planning applications data/GGP/R100 • Anne-Marie • GGP/other mapping	1st of April 1st of April 1st of April	
Waste Management	• New developments	• Planning applications data/GGP	1st of April	
Environment	• Listed buildings • Scheduled monuments • Conservation areas • Nature conservation • WLA/SLA • Carbon rich soils • Flood prevention	• Planning applications data/GGP • Planning applications data/GGP • Planning applications data/GGP • Outside data – SNH etc. • EAC information • Wind team liaison • Flood team liaison	1st of April 1st of April 1st of April 1st of April 1st of April 1st of April 1st of April	1st of November

Appendix - Data Analysis Methodology

- Figures presented below are predominantly described in terms **of new or altered permanent floor space <u>within buildings</u>**. This approach has been selected to avoid skewing figures when new horse riding schools, industrial units or other such uses set within large sites of which only a small portion is in active use have been approved. Exceptions may be made if the new use represents significant construction on the land on which it is based, for example, in the case of a new sports hall or ski slope. The approach is also useful in avoiding duplication of stated site areas when multiple developments take place within the same site area as defined by the applicant. Furthermore, the site area does not account for the floor space of buildings with multiple levels.

- **Retrospective applications not included** to gain an understanding of the number of **new** developments.

- When a use is **accessible to the public, the area of trading floor space has been cited; business, storage and industry floor space figures refer to the new or altered building as a whole**.

- In some instances **information provided by applicants is not detailed and in those cases as accurate a floor space figure as possible has been estimated**. This has been achieved through the measurement of space using mapping software or plans submitted by the applicant.

- For clarity, Uniform data entries listed under various **categories of the Town and Country Planning (Use Classes) (Scotland) Order 1997 have been aggregated** into general headings.

- Uniform data pertaining to **residential and agricultural uses has not been assessed**. All housing figures presented are drawn from aggregate totals of completions presented in NB1/NB2 numbers or through Housing Land Audit 2019. Agricultural changes of use are considered to have a low impact on the overall performance of the LDP.

- The figures presented below refer to those applications that have been approved or refused. They should **not be seen as an indication that development has subsequently taken place**.

- **Area lost in m2 refers to space that has been lost as a result of demolition of a change of use at the time of the application**. Those changes of use to residential from vacant land have not been included. A change of use from one type to another is not an indication of the quality of said space, or the market demand for it; it is purely an indication of space lost in quantitative terms. As such, conversion of obsolete industrial space to residential has, for example, been included in the figures.

For more information or advice, please contact:

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