

Our Ref: JSM/EH
Your Ref:

26 August 2004

Ayrshire Joint Structure Plan & Transportation Committee
15 Links Road
PRESTWICK
KA9 1QG

Dear Sir/Madam

**REPRESENTATIONS TO CONSULTATIVE DRAFT AYRSHIRE JOINT
STRUCTURE PLAN 2025**

We are writing on behalf of John Thomson Construction Ltd. to make representations on the Consultative Draft Ayrshire Joint Structure Plan 2025.

On review of the Consultative Draft AJSP, we wish to **object** to the proposed housing land allocations, in particular, the inclusion of the Isle of Arran with the North Coast area as a joint strategic location for housing. (Schedule 3).

The Isle of Arran has rural and urban characteristics, development and conservation issues and housing demand/supply that differs from the mainland local authority areas of North, South and East Ayrshire. This was self-evident at the recent local plan inquiry, which clearly showed Arran as having a significant demand for housing, both local and national. There is critical demand for additional housing development in Arran. The Island provides alternative, diverse and unique housing opportunities within Ayrshire that is attracting inward migration.

The unique status of Arran in relation to its mix of built and rural development, and the development potential and characteristics of the area, cannot be compared to the potential development areas highlighted in mainland Ayrshire.

The Spatial Development Strategy in the Consultative Draft Structure Plan focuses development promotion on the mainland within the core development area around the larger towns of Ayr, Kilmarnock and Irvine. We acknowledge the need to focus development on the major towns of Ayrshire and note and welcome the identification in Schedule 1 of Brodick as a Tier B Centre. However, the draft AJSP needs to acknowledge the unique opportunities on Arran, which has its own economic requirements and where the attraction of new businesses and professions is vital to the future economy of the Isle.

The Structure Plan does highlight and focus on the expected population reduction over the next twenty years within Ayrshire. However this cannot be seen to be the case in Arran, with unexpected population growth on the Isle identified in the 2001 Census that was found to be much higher than the population growth identified by the Local Authority. There is currently a greater population on Arran than that projected in the Finalised Isle of Arran Replacement Local Plan for 2009.

This population increase will have a “knock-on” effect on the required housing land supply for areas subject to growth.

This issue of housing land supply and the existing demand for development in Arran was subject to scrutiny at the recent Local Plan Inquiry held earlier this year. It was recognised at the Inquiry that there was an underestimate of the required housing development and population growth figures for the Isle, which was evident from Census figures, current school rolls on the island and Arran estate agents. All of these figures identify and support the increase of inward migration to the Isle of Arran that is not evident in the mainland areas of Ayrshire.

This has been addressed in part through the Isle of Arran Replacement Local Plan Inquiry process, where alterations to housing requirements and population have been proposed, prior to the Local Plan’s adoption. It does not however address future requirements where the Reporter, Mr. Henderson, clearly advised that **further allocations** should be identified. If this is not undertaken then the Reporter advised that applications for housing on Arran should be considered in terms of Paragraph 66 of SPP3: Planning for Housing, where it states:

“If development plans do not keep pace with the need to maintain a supply of land, planning permission should be granted in advance of local plan adoption provided that proposals comply with other policies of the development plan.”

It should also be noted that the previous Ayrshire Joint Structure Plan 1999, identified the development and conservation issues on Arran as diverse and separate to that of mainland Ayrshire. The relevant Arran AJSP Policies are ADS4, ADS6, L3, L4 and G5.

These policies do not specifically relate in their entirety to the Isle of Arran, but have identified the Isle as an area to be addressed independently. The AJSP promotes the view that potential development in this area should be acknowledged and included within strategic development policies and guidelines, in a manner acceptable for the Isle and it’s original landscape and characteristics.

The approach in the approved Ayrshire Joint Structure Plan is to make provision for housing land within the Local and sub Housing Market Areas, including Arran, as seen in Policies L3 and L4.

To ensure that there is appropriate and adequate land for residential development in Arran, the Structure Plan needs to take into account the pressure and demand for development on the Isle. Arran should have a similar policy as in Argyll & Bute, where it is acknowledged that houses in rural areas and the countryside should be permitted to support the local economy.

The potential scale of development areas on Arran should be identified to meet service demands and requirements. This is to ensure an acceptable variety of housing provision is available on the Isle. The provision of a choice of housing tenures in local settlements is very important to the Isle and its residents.

National planning policy acknowledges, through SPP1, that:-

“Strong, vibrant and healthy communities, in rural and urban areas, are an essential part of the vision for a socially just Scotland...The planning system should feature as part of an integrated approach to social justice by: - considering the diverse needs of the local communities in development plan policies...” (Para. 12)

Furthermore, SPP1 states:-

“To be effective plans must contain relevant and realistic policies which can be implemented. They should contain a positive and sustainable vision of an area’s future based on a thorough understanding of how the area functions, the challenges it is expected to face and community requirements and priorities.” (Para. 25)

Conclusions

The development requirements of Arran in comparison to that of the mainland strategic Ayrshire area are completely different, and raise a diverse range of issues in relation to sustainable development with sympathetic connections between the urban and rural areas. The rural and isolated location of the island and the designated rural landscape, restricts the land available that can be utilised to accommodate development pressure.

The demand for development needs to be identified and monitored to ensure growth and expansion is sympathetic with conservation and enhancement of the urban and rural landscape. As SPP1 comments:-

“Structure Plans must go beyond the expression of general criteria and indicate the proposed long-term nature, scale and location of change.” (Para. 33)

Without the allocation of housing land specifically for the Isle of Arran, it is difficult to determine at a local level, the requirements for all areas within North Ayrshire, from mainland to the Isle. Therefore housing land should be allocated separately for Arran to ensure that the mainland and the Isle complement each other.

We therefore recommend that the Isle of Arran is a separate strategic location within the Housing Market Area in the Draft Structure Plan and promoted for alternative and diverse development opportunities within Ayrshire.

We trust our objection in relation to the Isle of Arran will be taken into consideration in the review of the Ayrshire Joint Structure Plan.

If you require any clarification or wish to discuss matters further, please do not hesitate to contact us.

Yours faithfully

For James Barr
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Cc: John Thomson Construction Ltd