

Ayrshire Joint Structure Plan  
15 Links Road  
Prestwick  
South Ayrshire  
KA9 1QG

Our ref : APS/AC/CREG1000

BY E-MAIL

19 December 2003

Dear Sir

### **Ayrshire Joint Structure Plan 2025**

I refer to my recent discussion with John Estlemon regarding the above. We act on behalf of an individual client and land owner on this matter.

The preparation of a new structure plan is welcomed and I would appreciate if we could be kept informed of progress over the coming months. At this stage, however, I wish to comment on the housing land issue which you have identified as one of the key points to be covered by the new plan.

As you are aware, Scottish Executive guidance regarding land for housing is contained within SPP3. The document deals with a wide range of housing land matters but I would particularly highlight the following:

- There is an emphasis on creating quality residential environments, guiding new housing to the right places and establishing mechanisms to enable the delivery of housing land (paragraph 5);
- There is a requirement to place far greater weight on design issues throughout the planning process from land allocation to the determination of planning applications (paragraph 7);
- There is a requirement for local authorities, developers and other housing providers to consider the need to provide a wide choice of housing types (paragraph 23);
- Encouragement is given for more diverse, mixed communities providing a range and choice of housing opportunities (paragraph 24);
- There is a requirement for planning authorities to draw up long term sustainable settlement strategies to provide certainty and variety for housing providers and local communities (paragraph 28);
- There is advice that sites which no longer contribute significantly to the purpose of the greenbelt (or countryside) may be released for development provided that this does not undermine the greenbelt's overall effectiveness and integrity (paragraph 40);
- It is stated that where brownfield and infill sites cannot meet the full range of housing requirements, greenfield land and extensions to existing towns and villages can be appropriate (paragraph 44); and

- There is a requirement for development plans to take an even longer term view of housing land requirements than has been the case in the past (paragraph 60).

In addition to the above, you will also be aware of the advice provided in PAN 38 regarding the identification of housing land requirements. I would particularly draw your attention to the emphasis within the document on the need for authorities to balance housing demand with a range of other factors and the need to ensure a degree of flexibility in housing demand calculations. This flexibility should allow for a range and choice of housing sites.

From both of these documents it is clear that National Guidance requires development plans to ensure a **minimum** housing land supply but that there is no requirement to limit the identification of appropriate sites. There is, however, a clear requirement to ensure housing choice by providing a range of opportunities. While there is a presumption in favour of the reuse of brownfield sites in the first instance, there can be a sound basis for also identifying housing opportunities in greenfield locations.

Our client is aware of the historic research regarding housing demand and land supply. In this regard it appears that the development plan process has struggled to keep pace with projected demand, a position not helped by regular delays in apparently “effective” sites being developed. For these reasons, and given the policy guidance noted above, it is vital that the new plan allocates land for housing beyond that demonstrated through the demand calculations.

The most recent review of housing land requirements allocated the largest share of unit numbers to South Ayrshire and North Ayrshire. If perpetuated, this approach could lead to a significant imbalance between the housing market areas. It is suggested, therefore, that particular attention should now be paid to encouraging the meeting of housing land requirements in East Ayrshire.

Finally, in relation to East Ayrshire, it appears that there remains a limited range of housing opportunities in terms of type and location. The development plan process, starting with the new structure plan, therefore requires to particularly consider ways in which appropriate upper market housing can be brought forward. Provision of such opportunities, often in greenfield locations, can be critical in supporting inward investment and economic development. Experience shows that factors such as the ready availability of appropriate housing opportunities for key workers greatly influences decision makers involved in business and industry.

I trust that these comments will be of assistance as work on the new plan progresses. If any matters require clarification please do not hesitate to contact me.

Yours sincerely

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cc. Client