

Cunninghame House,
Irvine.

8 March 2017

Local Development Plan Committee

You are requested to attend a Meeting of the above mentioned Committee of North Ayrshire Council to be held in the Council Chambers, Cunninghame House, Irvine on **MONDAY 12 JUNE 2017** at **2.00 p.m.** to consider the undernoted business.

Yours faithfully

Elma Murray

Chief Executive

1. Declarations of Interest

Members are requested to give notice of any declarations of interest in respect of items of business on the Agenda.

2. North Ayrshire Local Development Plan 2: Main Issues Report Consultation Feedback and Direction for Proposed Local Development Plan (Page 5)

Submit report by the Executive Director (Economy and Communities) on the consultation responses to the North Ayrshire Main Issues Report (copy enclosed).

3. Urgent Items

Any other items which the Chair considers to be urgent.

Local Development Plan Committee

Sederunt:	Alex Gallagher (Chair)	
	Robert Barr	Attending:
	John Bell	
	Timothy Billings	
	Joy Brahim	
	Marie Burns	
	Ian Clarkson	
	Joe Cullinane	
	Scott Davidson	
	Anthea Dickson	
	John Easdale	
	Todd Ferguson	
	Robert Foster	
	Scott Gallacher	
	Margaret George	
	John Glover	
	Tony Gurney	Apologies:
	Alan Hill	
	Christina Larsen	
	Shaun Macaulay	
	Jean McClung	
	Ellen McMaster	
	Ronnie McNicol	
	Louise McPhater	
	Davina McTiernan	
	Tom Marshall	Meeting Ended:
	Jimmy Miller	
	Jim Montgomerie	
	Ian Murdoch	
	Donald Reid	
	Donald L Reid	
	Angela Stephen	
	John Sweeney	

NORTH AYRSHIRE COUNCIL

Agenda Item 2

12 June 2017

Local Development Plan Committee

Title: North Ayrshire Local Development Plan 2: Main Issues Report Consultation Feedback and Direction for Proposed Local Development Plan

Purpose: To note the consultation responses to the North Ayrshire Main Issues Report and agree to proceed to prepare the North Ayrshire Proposed Local Development Plan 2 in line with preferred options identified in the Main Issues Report.

Recommendation: Agree that: -

- i. the Committee approves the Main Issues Report for publication and consultation
- ii. the Committee approves the consultation statement for the MIR.

1. Executive Summary

- 1.1 This report provides feedback on a consultation undertaken on the Main Issues Report published as part of the preparation of a replacement Local Development Plan (LDP2) for the Council.
- 1.2 The Main Issues Report consultation was undertaken between 30 January 2017 and 24 March 2017. The consultation was intended to gather feedback from a wide range of stakeholders on the key issues for the LDP. The consultation attracted a total of 109 responses.
- 1.3 As part of a wide range of issues raised in response to the Main Issues Report, common themes that emerged related to both opposition to, and support for LDP2 allocating new housing land; opposition to, and support for, future development at Hunterston. None of the statutory agencies that responded objected to the Main Issues Report, but generally offered comment and support to the Council as part of the process of preparing its LDP2. A summary of all representations is provide in Appendix 1.

- 1.4 In response to the consultation responses, it is proposed to take cognisance of representations in the preparation of a Proposed LDP2 and, proceed to prepare a proposed plan on the basis of preferred options identified in the MIR.

2. Background

- 2.1 The Local Development Plan (LDP) Committee, approved the publication and consultation of a Main Issues Report on 20th January 2017. An 8-week consultation was undertaken between 30 January and 24 March 2017. The consultation was undertaken in line with statutory requirements; and included consultation events in 11 locations throughout North Ayrshire, as well as presentations to all locality planning partnership meetings in March.
- 2.2 The MIR is a consultation document intended to identify preferred and alternative options for change to illustrate how LDP2 will differ from the adopted LDP.
- 2.3 The North Ayrshire Main Issues Report for LDP2 sets out preferred and alternative options for the following topics: a vision for LDP2, supporting locality planning, housing (including housing policy and potential new housing sites), town centres, regeneration of employment land, Arran & Cumbrae, marine and coastal planning, Hunterston, and renewable energy.
- 2.5 A summary of the representations submitted to the Council during the MIR consultation has been provided and attached as Appendix 1. Full details of all responses (anonymised) is available on the Council's LDP2 web page, for further information.
- 2.6 Some of the headline matters to have emerged from the consultation include:
 - None of the statutory agency consultees (e.g. Transport Scotland, SEPA etc) objected to the preferred options in the MIR. In general, key agencies either supported the preferred options and/or submitted comments advising how the Council may produce a Proposed LDP in line with statutory and national policy requirements. Key agencies generally offer support to the Council in preparing its Proposed LDP.
 - A number of representations from housing industry representatives and those promoting land, support the addition of new housing land;

- A number of representations express opposition to the allocation of new housing, particularly in West Kilbride and Millport, on the basis of there being no capacity within community infrastructure, such as schools, health facilities, and roads, or that the housing is either not required or not provided to meet identified needs;
- Representations expressed a mix of support and opposition for developer contributions being sought from development for community and physical infrastructure, e.g. health, education, affordable housing and roads;
- Representation expressed a mix of support and opposition to new nuclear power station, tourism activity and renewable energy at Hunterston;
- General dissatisfaction was expressed at the condition of, and lack of investment in, West Kilbride and Millport; and
- LDP2 should provide a planning approach that reflects Cumbrae as a unique place rather than grouping it with either Arran or mainland communities.

2.7 A significant amount of representations were submitted to express support for, or opposition to, potential housing sites shown in the MIR. Comments relating to specific sites are not summarised in the key issues summary, but can be viewed online. All comments will be considered in the site assessments produced for each site. These site assessments will be produced to accompany the Proposed LDP2. The information in representations will assist in identifying the suitability of sites for allocating as development land.

2.8 A consultation outcome report for the MIR public exhibitions has been produced. This report provides key information about the MIR exhibitions and feedback provided by attendees. This will be placed on the Council website and distributed to attendees of the exhibitions.

2.9 The consultation responses are valuable in identifying views of stakeholders on the key issues for LDP2. While there is some opposition to some proposals that are identified in the MIR, there is little supporting evidence to suggest that LDP2 should take a significantly different approach than suggested. It is recommended that the Proposed LDP2 is drafted on the basis of the preferred options outlined in the LDP.

2.10 The implications of proceeding with the preferred MIR options are: -

- I. That preferred options outlined in the MIR will generally be the basis for developing policies and the strategic approach of LDP2, subject to specific details of recommendations;
- II. The Council will engage with statutory agencies in developing the Proposed LDP2;

- III. That the Proposed LDP2 is likely to propose the allocation of additional housing land to supplement the existing housing land supply, as a response to the poor performance of the housing market in North Ayrshire;
 - IV. That all site related comments will be considered in a detailed site report for each site. A recommendation on potential site allocations will be made as part of the Proposed LDP2. Sites will generally not be suitable for development where they cannot demonstrate they will be able to be developed within the Plan period, and/or are deemed to have an unacceptable impact on the environment.
 - V. That the preferred option for Hunterston will result in the Proposed LDP2 offering continued support for a range of uses at Hunterston, including for renewable energy and a new nuclear power supply.
- 2.11 In drafting policies for LDP2 in line with the preferred options, it is considered that reference can be made to MIR responses to ensure that, as far as possible, the LDP takes account of representations.
- 2.12 Any significant departure from the MIR will require to be justified at the time of reporting the Proposed LDP to Committee.
- 2.13 In respect of site selection, prior to the Proposed LDP being presented to the Committee, engagement with Locality Planning Partnerships and Elected Members should take place on the findings of the site assessment process.

3. Proposals

- 3.1 It is recommended that the Committee: -
- I. notes the content of the summary of consultation responses (see Appendix 1);
 - II. agrees the intended preparation of a proposed local development plan on the basis of the preferred options identified in the Main Issues Report; and.
 - III. agrees that further engagement will take place with Locality Planning Partnerships and Elected Members on the site selection process and development contributions, prior to the consideration of the Proposed LDP by the Committee.

4. Implications

Financial:	The costs of preparing LDP2 will be met from existing budgets.
Human Resources:	NA
Legal:	It is a statutory requirement for the Council to adopt a new LDP on a 5-yearly basis. LDP1 was adopted in 2014. While there are not any direct legal implications related to the publication of this MIR, failure to publish and adopt, will make it difficult to meet Scottish Government regulations that require the Council to adopt LDP2 within 5 years of adopting LDP1.
Equality:	An equality impact assessment screening has been undertaken on the content of the MIR, which has concluded that as the MIR is a consultation document and its content will not affect decision-making, it does not require a full equality impact assessment. However, it also recommends that as the MIR and consultation responses begin to inform the proposed LDP, a further screening, and full assessment will be undertaken as required, to ensure that consideration is given to how LDP2 will impact on specific population groups, to allow consideration to be given to the impact of the plan during its preparation.
Environmental & Sustainability:	The new LDP has been subject to a statutory Strategic Environmental Assessment (SEA), which will be published alongside the MIR for consultation. The SEA objectives align with the Council's sustainability strategy, and will maximise the environmental performance of all policies, development proposals and land allocations contained in the proposed LDP. It contributes toward sustainable development by ensuring the environment and sustainability are considered within decision-making.
Key Priorities:	LDP2 will assist with the implementation of the Council Plan 2015-2020. The preferred vision outlined in the MIR aims to deliver, spatially, the 5

	priorities in the Council Plan – particularly “growing our economy increasing employment and regenerating towns”, “working together to deliver strong communities”, and “protecting and enhancing the environment for future generations”.
Community Benefits:	Community planning and spatial planning are increasingly aligned, and North Ayrshire community planning approach is a leading example, nationally. There is considerable community benefit in aligning the LDP2 process to community planning to minimise consultation fatigue and to link the communities to routes to deliver their priorities and influence their locality.

5. Consultation

- 5.1 This report is based on the output from the Main Issues Report consultation and set out recommendations as to how to respond to this consultation.



KAREN YEOMANS
Executive Director (Economy and Communities)

Reference :

For further information please contact Neale McIlvanney, Strategic Planning Manager on 01294324686

Background Papers

North Ayrshire Main Issues Report (January 2017)

Main Issues Report – Summary of Responses by Chapter

This report contains a summary of the points raised through formal representations to the Main Issues Report that were submitted to the Council during the consultation period for the Main Issues Report.

The consultation period was open between 31st January and 24th March, 2017. During that period 109 separate representations were submitted to the Council. Of those, a significant number of representations were specifically relating to individual sites that were consulted on through the Main Issues Report. Comments have been summarised where they offered detailed comments. A number of representations either stated general support for, or opposition to, comments in the MIR. Representations indicating general support/opposition have not been included in the summary, unless they provided additional detail on the reasons for support/opposition, on the basis that this report summarises substantive comments. Comments relating specifically to sites have not been included in this summary report. This report instead focuses on comments submitted on the general approach to the main issues outlined in the Main Issues Report.

For transparency, full, unedited comments can be viewed online at: - <https://www.north-ayrshire.gov.uk/council/consultations/mir.aspx>.

The responses submitted to the Main Issues Report were from a range of stakeholders, including: -

- Key agencies (i.e. government/non-government non-profit bodies that are statutorily consulted during the preparation of the LDP);
- Members of the public;
- Community groups/representatives (including community councils)
- Private or commercial interest (including agents acting on behalf of commercial businesses)

Comments received by technical stakeholder that submit comments from a perspective of having an organisational remit have been highlighted (e.g. Transport Scotland, SEPA) in bold for ease of reference. In general technical stakeholders have not objected to the content of the MIR, but in most cases offer assistance to the Council to support the preparation of LDP2 to address detailed considerations of those agencies.

In addition to the formal representations submitted in response to the Main Issues Report, a series of public LDP exhibitions were held during February/March 2017. The feedback from those events is recorded in an LDP exhibition outcome report, which can also be viewed at the hyperlink above.

The feedback from the Main Issues Report consultation and LDP exhibitions will inform the work to prepare the Proposed LDP. In particular, all MIR comments relating to sites have been categorised and referenced against the site reference, so the comments can be considered in the detailed site analysis process. All detailed site assessments will be presented to the LDP Committee alongside the Proposed LDP as a background document.

The remainder of this report categorises the comments to the Main Issues Report, grouped to reflect the chapters in the Main Issues Report.

Vision

Comments Vision

Housing:

There was a mixture of support and opposition to the vision's intent to support population growth through stimulating the housing market. Generally, housing industry, landowners and agents expressed support for LDP2 supporting the delivery of new houses, while opposition to the proposals was generally from residents and communities (particularly in North Coast areas).

Supportive comments include recognition of economic benefits and that housing can support action to reverse population decline and improve the local tax base and economy. Homes for Scotland (industry body for private and social housebuilders in Scotland) welcomes the fact the Council has placed House Building so high on its preferred options list, and aims to support the commercial house-building industry to build new houses in North Ayrshire recognising this approach would achieve considerable benefits to the area's economy and communities as well as to the home building industry.

Opposition to the principle of identifying new housing land in LDP2 commented that the vision does not connect to the proposed plan and doesn't reflect true community interests, but seems contrived to financially benefit developers and landowners. The site selection for future housing land is criticised.

The need to refer to housing in the vision is questioned. Particularly given the predictions for population decline.

Other comments include: -

- Policy RES3 in LDP1 for Kelburn Castle should be removed as it is unnecessary and unenforceable.
- LDP2 should plan for social housing, and reflect the basis for social housing planning before the 1980s.
- It should be recognised that SME house builders can also contribute to the delivery of new houses.

Hunterston:

Comments related to Hunterston included one comment that stated general disagreement for MIR preferences for Hunterston. Other comments indicated that some aspects of the Hunterston proposals are positive, however a new nuclear build should not be supported; instead the focus should be sustainable energy.

Cumrae:

A number of comments were submitted in response to the vision, related to Cumrae. These are summarised in the responses to Arran and Cumrae MIR chapter.

General:

The following general points were raised in response to the Vision in the MIR:

- **Scottish Water** is committed to engaging with North Ayrshire Council on a regular basis and assisting with the delivery of the preferred vision for the region.
- Support the intention to imbed sustainability into all development proposals (through a place making and sustainability policy).
- Support that the MIR recognises the quality of the natural environment within the vision and support the commitment to prepare a Green Network Strategy, which could build on existing work (such as the Garnock Connections Landscape Partnership).
- The LDP should be more forward looking, covering a longer time-period, which is updated on a 5-yearly basis.
- The vision should be focused around detailed analysis of infrastructure requirements of each community, recognising the demographic (and ageing) profile of the community.
- The intention to adapt and mitigate to the challenges of climate should be included as a strategic priority.
- The vision should consider the impact of an ageing population in terms of access to services.
- The vision should support expansion within our towns or areas that are served by public transport to support accessibility to employment. Remote enterprise areas can exclude those who rely on public transport. We have spaces within our town areas that can be transformed but we keep pushing out-with the towns. This is a disaster for our towns.
- The vision should be modified to include sustainable economy and wellbeing, community empowerment, skill development, improved environmental quality and a reformed strategy for public and private funding.
- The vision should be based on evidence of what has happened over previous 10 years.
- The vision should provide a better link between plan priorities and funding priorities geared around physical and technological infrastructure.
- The vision should include protection of town centres as a priority, with growth focussed round town centre locations.
- The vision/LDP should consider community gain and quality of life issues.
- The Vision for the LDP2 is helpful and sets the context but as with the comments in equality and accessibility could be expanded to include the role of rail and how this should be protected, enhanced and also assist in the promotion of development.
- The focus for the North Coast should be tourism-based rather than supporting further industrial development.
- No new golf courses required. Instead, LDP2 should focus on provision of historic trails.
- The vision does not attempt to meet the needs of rural North Ayrshire.
- The vision does not provide specific measured proposals; it is generally a jargon-based statement of a positive North Ayrshire.
- The vision does not include reference to climate change defences.
- A comment criticised the vision as weak and lacking focus. It does not tackle the poor state of pavements in West Kilbride, proper traffic management with appropriate signage and parking, nor the poor state of the buildings and look of them.
- The vision has no regards for public toilets or facilities for tourists.
- There is a requirement to provide parking in Fairlie.

Locality Planning

Comments Locality Planning

A range of comments were submitted related to the locality chapter in the Main Issues Report. Generally, the representations considered the alignment of spatial and community planning was positive, but offered comments on how to ensure community opinions were given full weight and, in certain cases, indicated priorities for locality areas.

- LDP and LPP should be integrated if true consideration is given to community views and budgets are provided to fund solutions
- Community views on developer applications should be weighted to balance the resources available to other parties.
- Communities should be engaged early and throughout handling specific development proposals.
- Tensions between spatial planning and community planning should be managed to avoid community mistrust.
- Community planning and spatial planning should be aligned, but supported by better funded and accountable locality groups to deliver coordinated action.
- Until locality planning is established it is difficult to comment on whether they are successful.
- Approach to locality planning is flawed in relation to Cumbrae as it should be recognised as a separate community.
- A representation recognised the importance of engaging communities in LDP plan-making although commented that viability of development should be considered.
- Housing is only identified as an issue on Arran, within locality chapter; yet a significant number of houses are proposed around West Kilbride (where issues relate to health and jobs).
- Some towns do not have any focus on economic development. Kilwinning is not featured, where there should be a focus on leisure and development rather than only housing.
- The locality priorities should also include promotion of outdoor access and travel as a means to support leisure and tourism based activities.
- Other issues to be considered include parking and disabled access, health and hygiene of public toilets.
- LDP2 appears to be facilitating development without requiring developers to provide local infrastructure
- The provision of infrastructure is not always considered.
- LDP2 should provide a full commitment to a Fairlie bypass.
- A community greenspace in Kilbirnie would be a valuable resource to the locality.
- Locality planning provides an opportunity to record, protect and enhance green assets.

Delivering Houses

Comments Delivering Houses:

Comments relating to the Delivering Houses chapter of the MIR can be grouped into those expressing general support for LDP2 allocating additional land for housing development; those that opposed this course of action; and other general comments for consideration in preparing LDP2. The table below shows the range of comments within these groupings. As outlined above, this report is intended to give an overview of support/opposition/general issues raised; not to be a detailed record of comments in support of, or in opposition to, specific proposed or existing sites. Such representations can be viewed online.

Opposition or Concern about Allocating new Housing Land

- General concern has been expressed that the process is geared towards the financial gain of landowners and developers.
- Stimulating house building ignores needs of sustaining communities. Maintaining the viability of communities should be paramount.
- Concern has been expressed about the intent to allocate green field sites.
- Existing allocations should be promoted rather than adding more land to the housing supply.
- Brownfield land should be developed rather than adding new land to the housing supply.
- There is no intent to provide housing that is required to support population demographics (e.g. amenity houses, bungalows), instead seeking to provide large family homes to attract commuters on prime green land.
- Concern has been expressed regarding the lack of amenity and social housing.
- Housing increases exacerbates demand for health, education, transport and other infrastructure services.
- There would appear to be no clear justification for additional houses given there is a falling population and large housing land supply at present. A 5-year review of housing needs should be built in.
- Oppose the proposal to add hundreds of new houses to West Kilbride, which experiences capacity problems with schools and health facilities. Would support the preferred option of not adding any new housing land.
- Fairlie does not have the infrastructure to support more new housing than already has planning consent. New flats at the North of the village and some of the proposed new housing at Castlepark should be re-designated as affordable housing.

Support for General Approach to Support Housing Development

- The Council should allocate new, effective sites as part of LDP2 to ensure an adequate supply of housing in the region that can be demonstrably delivered within the LDP period (for example through development programmes).
- The LDP must take a positive and flexible approach to planning for housing to accommodate North Ayrshire's challenging economic conditions.
- Housing allocations with an attractive outlook can support population retention.
- Support for replenishing the supply of effective housing sites by allocating additional land in place of non-effective sites.
- A number of developers and the Homes for Scotland (national industry body for housebuilders in Scotland) have supported the preferred option to increase the Housing Supply Target to be higher than the housing estimate identified in the Housing Needs and Demand Assessment; and to set the Housing Land Requirement with the maximum 20% generosity to the Housing Supply Target; and for the selection criteria for new sites, explained in the MIR.
- The LDP should provide an oversupply of housing land to ensure a sufficient supply is available, which can assist developers to develop the 'low hanging fruit' sites, to improve short term delivery.
- Support (from commercial and general public) for deallocation of land that is not effective for housing development or reclassifying land as non-effective.
- Sites that are unlikely to come forward before 2029 should be de-allocated to give infrastructure providers improved certainty of delivery of sites.
- There should be a presumption in favour of and a further relaxation of conditions for countryside housing in order to stimulate the economy. Consideration should be given to development on small sites adjacent to catchment boundaries for affordable private market housing for sale to those aged 20 - 40 years.

- The green, amber, red traffic light system of assessing suitable sites is a useful tool in helping to ensure that only those sites that can be brought forward and are effective are included as allocations within the Proposed Plan.
- The allocation of effective sites on Arran could address the unique challenges here in terms of population decline and higher than average house prices by ensuring that new housing is built within the Plan period.
- Support Beith being a preferred location for new housing.
- The marketability analysis for the Garnock Valley is accurate as reflected in the failure of sites in this area to deliver. This should be reflected by removing sites from the LDP or reclassifying as non-effective and allocating additional sites in the Garnock Valley.
- Sites associated with a builder should be given increased weight.

General Comments

- **East Ayrshire Council** has commented that as part of the Ayrshire Growth Deal an Ayrshire region transport model is to be developed and LDP2 should take account of this.
- **NHS** request that developer contributions should be made available for Health as currently exists for Affordable Housing and Education.
- **SEPA** has commented that it expects all current land allocations (e.g. from LDP1) to be reviewed, from **SEPA's** perspective to be able to comment on matters that may have changed since the allocation was made.
- **Transport Scotland** has submitted representation indicating that it is unable to determine the spatial impact of development on the transport infrastructure and that further detailed consideration of the impact of development should be undertaken. **Transport Scotland** is keen to engage with NAC further to determine the cumulative impact of existing and potentially proposed new development (including the potential replacement of land sufficient to provide 1517 non-effective houses with land to provide an additional 1500 units.
- **Sport Scotland** has commented that it would seek further engagement on proposals related to outdoor open space or sports areas to ensure those facilities are safeguarded.
- In developing site selection criteria, **Scottish Wildlife Trust** recommends an approach that protects a range of environmental assets (including SSSIs, Natura 2000, LNCS, ornithological sites, local nature reserves, and wildlife corridors). These are generally offered such protection by LDP1 policy ENV9, and this should be maintained in LDP2. **SWT** recommends development and promotion of green networks.
- **Scottish Water** will work closely with North Ayrshire Council to identify infrastructure requirements for sites and prioritise strategic development areas.
- Developer contributions and requirements (including capacity and design matters) should be developed as part of a site brief process.
- Developer contributions should be directly relatable to the development and should be in line with Government guidance on planning contributions.
- Developer contributions should be sought for green infrastructure and active travel.
- Developer contributions should not be removed. Once removed, contributions cannot be reintroduced. There is a significant affordable housing need for young and elderly.
- Developer Contribution for the North Coast has effectively destroyed the private housing market and should be reduced or removed. This policy has a deleterious effect on the supply of affordable market housing and also high quality housing and has skewed the market so much that only new affordable rental property is available.
- Fairlie Community Council considers that private development should provide a proportion of affordable homes for each private home.
- It is reasonable to expect developers to contribute to affordable housing since they don't contribute planning gain.

- Prioritisation of sites should be based on available community infrastructure within the plan period.
- The infrastructure impact of new housing must be considered (on education facilities, health care facilities, roads etc.)
- New housing and other developments should make provision for wildlife within the built environment, for example planting of native tree species and incorporating nesting sites for species which use buildings. New housing development should be targeted to where environment impacts are minimised and community need exists.
- No new housing is required on Cumbrae, and the settlement boundary on Cumbrae should not be reviewed or altered as this could undermine the vitality and viability of the town at the expense of the rural area.
- The zoning of the Cathedral on Cumbrae for housing should be rescinded to preserve the heritage of this building.
- Development should be directed to within settlements to promote sustainability of access. Where development impacts on transport infrastructure capacity, contributions should be sought.
- Prioritising brownfield land may not be effective as developers are generally interested in sites that are attractive to buyers.
- New housing should be directed to brownfield sites.
- More 4 bedroom, accessible properties are required.
- Purchasing abandoned properties should be explored and upgrading of older housing stock.
- Representation disagrees there is no demand for houses in Kilbirnie.
- There should be new social housing provided in Kilbirnie and Beith.
- Developers working in partnership with social housing developments should be given priority over blanket contribution policies.
- New sites should be added where there is need, not where developers can maximise profits.
- Fairlie Community Council considers that LDP2 should drive improved density and design standards and include greenspace, to improve mental health and community disassociation.
- In allocating new housing land, the impact on natural heritage should be a consideration.
- Access to services (specifically retail, education and transport) could drive locations for site selection.
- Sites allocated blue in the constraint analysis (i.e. those that are existing allocations or are of a scale that is not suited to new allocations) should be prioritised for development.
- Mixed use allocations can stall development sites, where a single (residential) designation may have attracted a developer.
- It is a reasonable to await finalisation of the HNDA to make a judgement on affordable housing policy.
- The LDP should encourage self build developments either on land that NAC owns, on the periphery of settlements, or by relaxing planning conditions for small developers who wish to promote this.
- Oppose extension of development land into Muirshiel Country Park - the cemetery was meant to be the buffer to prevent sprawl into the countryside.
- Onerous planning regulations lead to the demise of small builders and so reduced the number of homes built. Planning Restrictions should be more flexible for small builders. We should support the development of small sites.
- It is recommended that some of the housing pressure could be alleviated by providing houses at Beith.
- Largs Community Council objects to any development of land (including specific proposals made through the call for sites) being allocated where they encroach into Clyde Muirshiel Regional Park. There is a significant amount of land on the east side of Brisbane Glen Road

which is not within the Regional Park, which NAC should look to, if there is a requirement for greenfield land for housing.

Site specific comments:

A range of comments and supporting documents were submitted to either express support for the allocation of sites (generally from the proponent) or to express opposition to particular sites. Some comments, including from key agencies and members of the public, recommended that existing allocations are reviewed with a view to taking account of changed environmental circumstances that may give reason to deallocate the site. Detailed comments can be read online. For the purpose of providing feedback on the output of the MIR consultation, comments on individual sites do not require in depth reporting. These should be fed into the detailed site selection process.

Town Centres

Comments Town Centre

Comments on the town centre approach generally supported the approach to prioritising town centres, and there was no objection to this approach, in principle. A range of comments were received related to how, in practice LDP2 should reflect this approach, and these are shown below. Some comments were received related to specific town centres. These comments are also shown, and will be considered in the preparation of LDP2.

- **Sport Scotland** support the town centre approach, and recommends that, in line with Scottish Planning Policy, some flexibility is built into this requirement where, for example, it may prove difficult to locate sports facilities in town centres.
- Network of centres is sustainable growth option for communities.
- Ayrshire Metal Products supports the identification of Irvine as the primary town centre in North Ayrshire.
- With an ageing population promoting town centre living is a very sensible idea. Less reliance on a car and easier access to local services, particularly on foot.
- The LDP should plan for the impact of online shopping. Particularly, it should support a reduction in town centre boundaries, supporting mixed range of uses in town centres (including residential), making smaller centres more attractive, reducing long stay car parking, retention of public buildings and footfall drivers in town centres.
- The LDP should focus on town centre housing to support an ageing population and their needs for smaller old age friendly housing (finisher homes?).
- The network of town centres does not operate in a vacuum. Glasgow, Braehead and Ayr offer strong competition. Thus town centres must be convenient and accessible.
- If each town centre had a multifunction centre within it that caters for advice, careers development and workshops for trades and crafts/arts then it would give people a reason to visit our town centres and increase trade to local shops. It will have positive effects also for communities that are divided and help solve many social issues that we face.
- Disappointed that commitments made in LDP 1 have not emerged as action. Concerned at the lack of maintenance and upgrade in town centre (specific town centre not named)
- Effort and money seems to go to the three towns - hardly anything to West Kilbride. It is asserted that this is a political decision.
- All new town centre developments should consider accessibility to rail services; and, where impacting on rail network mitigate impact of development through funding.

- The plan should support facilities to allow cycling to and from town centres
- Saltcoats station car park is pay and display, which has reduced access to Saltcoats and must affect the footfall in the town.
- LDP2 should focus on redeveloping town centre of Irvine.
- Town centre proposals should increase focus on anti-social behaviour, littering, dog mess graffiti and vandalism.
- Out of centre competitors rely on good accessibility and infrastructure and parking which mean they are competitors to town centres. Good town centre accessibility is vital.
- There should be a presumption against change of premises from Class 1 to Class 2 in order to support the retail offer in town centres.
- Support should be given to regulation of on street and off street parking and also provision of more off street parking particularly in Largs to contribute to improving the vitality of the retail and tourist trade.
- Support the provision of Public Wi Fi.
- In general, West Kilbride needs continued investment and support from NAC to improve the quality of the town centre.
- LDP1 has not delivered on regeneration and conservation intentions for West Kilbride.
- The town centre audit for West Kilbride contains inaccuracies.
- West Kilbride Community Council support the identification of a craft town status for West Kilbride.
- A number of comments have been received in relation to both Millport and West Kilbride generally seeking regeneration and investment in those town centres as well as initiatives to improve parking and traffic management and public realm and paving. Such investment would promote the attractiveness of the places and promote living and economic activity within those centres. The assets of the town centres should be promoted.
- Fairlie needs to be further promoted as the historic and charming village that it is. Tourist signs advertising its yachting heritage and historic old inn should be promoted and not, as in the past, discouraged and prevented. NAC needs to do more to protect the centre of Fairlie by demanding that the road authorities install pelican crossings and making real attempts to prevent lorries and other vehicles speeding through the village. Fairlie's ancient monuments, castles and their beautiful environments need to be properly protected and not allowed to become the prey of profiteering developers.
- Business rate exemption for i3 should also apply to Kilbirnie and Beith.
- Vacant properties in Kilbirnie and Beith should be redeveloped as training and employment space to support start-up businesses.
- Kilbirnie and Beith are excluded from preferred options. The Garnock Valley should be designated as a sub-regional centre.
- Largs requires the separation of through traffic from the town centre and thus restore the town centre's role as a tourist destination.

Arran and Cumbrae

Comments Arran & Cumbrae

Comments were received related to each of the islands, with some generic comments on how LDP2 should plan for the islands. These comments are noted, below, within these groupings.

Arran:

- The **National Trust** supports North Ayrshire's intentions to support economic growth on Arran and considers there is a need to allocate land for housing to support population retention and growth. Affordable housing options will assist younger generations to stay on the island.
- The Arran Economic Group supports a review of the current approach to housing in the countryside in order to build appropriate housing, as well as the engagement with the Arran Economic Group to identify positive solutions, as encouraged by SPP, to support new housing on the island. It is considered that in adopting a flexible and positive approach to new housing on the island this will in turn address the current issue of population decline.
- Confirmation of the status of Ardrossan as the main port for access to Arran with medium-term provision of two faster vessels to allow an hourly service between Brodick and Ardrossan for most of the year and with better connections to the existing hourly rail service to Ardrossan Pier – confirm nature of works to improve bad weather reliability (with Troon considered as an alternative port in high wind conditions). Ardrossan and Brodick may also be suitable for use by intermediate size cruise ships.
- Improve environmental conditions on Arran by ferry charges varied to give greater incentives for unaccompanied passenger travel and cycle travel at peak travel times and consideration of lower maximum speeds on Arran roads.
- Some areas in Arran have been identified by the Scottish Government as crofting areas and are in the national interest. These areas should be protected from development.
- Land should be provided on Arran for industrial and commercial needs, but avoiding national important areas (such as land for crofting).
- Lochranza: This village is in need of rejuvenation, yet there has always been very limited provision for development allowed. Consideration should be given to making sites available on the rising ground to the north and north-east of Lodge Farm. These face south for light and are well above the flood-plain level.
- Sannox: The sites along the roadside to the north of the existing settlement will not be released for development because the whole of Sannox Farm is only 50 acres (about 22 ha.) in extent and the area zoned for development is some of the better agricultural land. There is no reason to zone any land in Sannox for additional development at all.
- A new village community between Kildonan and Kilmory, on ground known as Leglany, near to Balegra would rejuvenate the South-end of Arran. This community would be a model of all modern technology, from energy provision to sewerage disposal (an eco-village, if you like) and in a location where there is a need to open a shop and post office, maintain the local primary schools etc.

Cumrae:

- LDP2 should recognise that Arran and Cumrae are different locations and planning for Cumrae should recognise the island's unique characteristics, rather than group it with other locations. This is essential if Cumrae island proofing is to be achieved. There is concern that the evidence gathering to inform the MIR was not sufficient, in relation to Cumrae. Community engagement should not focus only on the Cumrae Economic Group, but the whole community – including the community council. LDP2 should remove reference to the Economic Group's strategy. The use of local place plans should be support for Cumrae.
- LDP2 for Localities emphasises the need for Cumrae to be treated as a separate entity in developing planning policies to reflect the local communities' aims and aspirations. The opportunities of marine tourism must be taken into account in conjunction with the proposed Flood Protection Scheme. It should be a priority for a dedicated cycle path (separate from the road) between the Field Studies Centre and Cumrae slip.
- The Council should support the Cumrae Economic Group.

- LDP2 could demonstrate and achieve support and stability for the community on Cumbrae is by protecting the vital shoreline between the circular shore road and the sea - which is absolutely the island's strongest attraction and most important asset from any form of development.
- In order to protect and enhance the environment of Cumbrae the existing settlement boundaries need to be maintained. There are enough sites suitable for development within the boundaries.
- 'A bid for £15m to develop Marine Tourism across North and South Ayrshire' more details would be appreciated. I.e. If bid is successful would some of this money be spent in developing Marine Tourism on Cumbrae.
- Greater recognition of the current major assets of the island should be taken into account in developing planning policies for the island including the FSC, the National Watersports Centre, the Scottish Sailing Institute, the Cathedral of the Isles etc. as well as key activities such as cycling, walking, swimming, boating etc .
- LDP2 should fully embrace and support Cumbrae's potential for socio-economic growth and overall improvement from marine tourism opportunities. This requires to be the main focus of the LDP2 for the future well-being and improvement of the island and the town itself. The development of Marine Tourism should be a priority for Millport.
- Cumbrae has already been severely impacted on by energy related developments over the years. New renewable energy developments should not be supported on Cumbrae in recognition of its small size, the high visibility that any such development would therefore have, the detrimental impact on tourism in an otherwise unspoilt location and the cumulative effects of existing schemes in the surrounding area on the island.
- Regarding the comments in the MIR about higher house prices in Arran, if North Ayrshire Council got it right for Millport, Millport could also enjoy higher house prices.
- Island development requires workers but the profit margins of many businesses are low. Thus there is a need for social housing to allow island families to be retained. This provides a stable community.
- Whilst in no way preventing enterprise the need to preserve the amenities of the islands for visitors must also be addressed e.g. access to shore and hills.
- Millport has benefitted from the restored Garrison building. The Marine Research Station has been brought back to life. Thus to continue to prioritise Great Cumbrae would prove beneficial.
- LDP2 should support the provision of hotels/self-catering accommodation.
- LDP2 should support the provision of homes for persons aged 20-45.
- LDP2 should support quality self-build houses in the rural area.
- Ferry charging and speed restriction policies could apply on Great Cumbrae, already Scotland's cycling island but with increasing problems of conflict between motorised vehicles and cycles. Over spring to autumn, consideration should be given to a passenger and cycle ferry between Largs Marina and either Keppel or Millport pier with occasional trips on to Kilchattan Bay on Bute.
- Consideration of further opportunities for spring to autumn cruising by 'heritage' vessels and newer, cheaper to operate, passenger and cycle only vessels e.g. - Millport-Largs Marina service could run on to Largs and Rothesay.

General Comments:

- Wildlife and the natural environment support tourism on the islands and are a significant driver in attracting people to move to live on the islands. The LDP must recognise the value provided by wildlife tourism and outdoor recreation on the islands and the LDP should support efforts to stimulate and promote this economic activity. However, it is also vital that the LDP includes measures to protect and enhance these natural assets to ensure they can

continue to provide economic benefits to local communities, in addition to their intrinsic value

- Arran and Cumbrae are beautiful places but suffer from the same lack of understanding from Cunningham House that afflicts the North Coast. I do not think that anyone in NAC could have sat down and sensibly considered the absurdity of closing public toilets in tourism related areas.
- Better bus shelters and other bus infrastructure should be provided.
- Planning for the islands should be guided and developed by the island communities.
- Eco-tourism proposals on the islands should be supported as they provide jobs to support the economy.
- Public toilet facilities should be provided.

Regeneration of Employment Land

Comments Regenerating Employment Land

- **Scottish Water** supports preferred options, however encourages continuous engagement in the LDP process and in progressing development proposals as it can be difficult to estimate the infrastructure requirements of a site without knowing the end use.
- **RSPB** understand and support the principles behind making best use of vacant sites within settlements; however concerned that development may be promoted on vacant and derelict land without proper assessment and recognition of its potential wildlife value. Brownfield sites can often provide habitats for a range of priority species and it is important that they are properly surveyed and if necessary, protected through designation.
- **RSPB** encourage, where appropriate, the LDP should provide support to reclassifying vacant and derelict land as local wildlife sites or even potentially new Local Nature Reserves.
- **RSPB** offer site specific comments have been submitted in respect of the call for sites submission at Ardeer peninsula, as well as vacant land adjacent to Bogside Reserve and Hunterston. These comments will be included in site assessments. Full details of comments can be viewed online.
- **RSPB** advises that any Growth Deal projects must be subject to the same level of scrutiny and assessment as any other development. Meaningful public and stakeholder consultation on the proposed developments must be part of this process. RSPB is pleased to see mention of the potential sites at the MIR stage but emphasise the importance of fully incorporating any potential development proposals as part of the proposed LDP, so that these are not brought forward outside the planning process.
- As part of the LDP preparation, potential environmental impacts of any proposals in the Ayrshire Growth Deal must be considered as part of Strategic Environmental Assessment and Habitat Regulations Assessment processes.
- LDP2 should give consideration of how proposals can contribute towards climate mitigation and adaptation. Integrating climate risks can not only deliver multiple benefits in terms of for quality of life, recreation and wildlife but would also save money in the long term.
- The LDP should reallocate some vacant and derelict land for housing; which is an approach aligned to Scottish Planning Policy.
- All employment land zones should allow potential for housing development under certain conditions.
- The LDP should support businesses with a commitment to the area
- Some business operators have not been good landlords. Often businesses take advantage of initiatives and relocate once the initiative is used/withdrawn.

- New development locations should consider town centre sites and sites close to rail links. Where development impacts on rail facilities, the developer should mitigate the impact.
- Improved rail and road connection would improve inward investment.
- The LDP contains a disappointing focus on roads, whereas it should improve its focus on cycling and walking links and access. There is a need for a cycle link between Kilwinning and Kilbirnie. There should be cycle links to town centres.
- LDPs should not only align with economic strategies but views of residents.
- The Cumbrae coast and rural environment is a prime asset and should not be damaged by development. A coastal protection zone should be designated on Cumbrae.
- The preferred options do not align with national potential for key sectors (or Scottish Planning Policy) – particularly renewables and life sciences. The LDP should allocate suitable sites for local energy and related developments and support energy efficient businesses.
- The MIR fails to recognise the location of the Garnock Valley being a close connection point
- Support the review of Lochshore as a dual employment and residential location. The Lochshore site (and other derelict sites) should not be promoted for housing where this compromises the ability of the site to provide jobs. Lochshore should be an employment site and support an Enterprise Zone for this location.
- Support i3 approach, however question the effectiveness of the approach given prevailing employment and deprivation statistics, and the impact of displacement on the Garnock Valley.
- The LDP should be unequivocally supportive of new business development in the countryside.
- The LDP should support solar renewable energy which could support leisure and recreational businesses and provide jobs.
- NAC should champion the protection of the environment, including SSSI designations.
- Approach to vacant and derelict sites (advancing through LDP or AGD) should consider impact on natural heritage.
- Concern expressed about locating facilities in business locations as this could undermine town centre first approach.
- Ayrshire Metal Products considers that mixed use zones have failed to be successful in some instances, and that a single zoning for residential may be more successful.
- LDP2 should reflect the aspirations of NPF3. Development of already designated brownfield land in the Irvine Bay would improve the prosperity of the area.
- The MIR should rename this section 'Employment Land'
- The LDP should include support for employment and mixed use areas, to support trend for home-working.
- Acceptability should be considered on the basis of surrounding uses.
- Office provision should be created close to Glengarnock Station.

Integrating Marine and Coastal Planning

Comments Integration Marine & Coastal Planning

- There is a requirement for existing and likely future **Scottish Water** assets, such as sea outfalls, to be safeguarded against potential uses which could conflict with infrastructure needs. Access to the coast is a major attraction for both North Ayrshire residents and visitors.
- **SNH** do not support the approach to abolishing coastal zones and consider this does not align with Scottish Planning Policy. **SNH** offer support in preparing LDP2 to differentiate between coastal zones.
- **SportScotland** encourages the Council to ensure its approach to coast management is sensitive to protected sensitive coastal and sports assets from development.

- Support proposals to integrate the production and implementation of both LDP2 and the Clyde Marine Regional Plan and North Ayrshire Council's proactive approach to ensuring that happens through inclusion in the MIR. It will be important that any developments along the coastline consider any potential impacts on the Marine Protected Area network or undesignated features of importance, as identified through the marine planning process, (as well as environmental designations onshore).
- Marine and coastal planning should look beyond local authority boundaries.
- It is important that environmental designations are taken into account, protected and where possible enhanced when identifying areas for potential development. This should not just occur outwith this network.
- Do not support a presumption in favour of flood alleviation measures identified by flood risk management plans. The measures should be assessed against other planning policies, including ones to safeguard the environment. Reference should be made to the best practice guidance on Sustainable Urban Drainage Systems and Wildlife.
- Marine and coastal planning should take account of the impact on islands, and promote island assets as well.
- Marine Tourism should be a priority for Millport and the outcome of the current Coastal Flood Protection Scheme consultation should in no way jeopardise future development within Millport Bay. It is also important that the pier be retained as part of this development potential. Development should not be confined to Millport HARBOUR. Millport BAY should be an identified area for potential development.
- Undeveloped coastal areas must be afforded full protection from development.
- Flood alleviation measures are essential given the effects of climate change. This will involve careful planning of land use in the hills and countryside.
- The decision to demolish Fairlie Pier should be reviewed to prevent such short sighted mistakes in the future.
- Fishing interests of marine planning also need to be considered. Recent decisions to refuse use of Ardrossan Harbour for fishing has resulted in a loss to Ardrossan.
- A range of representations support the management of flood risk, in line with national policy.
- Marine and coastal planning should be part of a wider climate change approach in the LDP, which should consider flood management.

Hunterston Port Energy Hub

Comments Hunterston Port Energy Hub

- **Scottish Water** supports the creation of a Development Framework and Masterplan, which will provide a coordinated approach for the future planning of this area, giving **Scottish Water** increased certainty and allowing us to align our infrastructure priorities. We would wish to be involved in the consultation process for the production of these documents.
- **SNH** offer support in developing environmental protection policies to ensure design and mitigation measures related to natural heritage are provided.
- **RSPB** Scotland supports small scale appropriately sized biomass development with fuels from local sustainable sources.
- **RSPB** notes the proposal to remove the need to renew the consent for the Hunterston test turbines. The reason for this renewal was because this development was piloting a new technology and monitoring impacts. This was not intended to be a permanent development. Any change to the lifetime of this development should be subject to a review of monitoring data for the site and should be reviewed as part of the planning application consent process.

RSPB does not believe that there is a need to change the LDP policy or that it is inconsistent with Scottish Government guidance regarding the tests for setting planning conditions.

- A number of representations (including one from **RSPB**) oppose a new nuclear build at Hunterston for reasons including that it is not reflective of NPF4, and the impact on environmental assets and generation of pollution resultant from the development.
- Peel Ports support the designation of a national enterprise zone at Hunterston, which could expedite processing of development proposals
- Peel Ports support the wide range of uses recommended for Hunterston as these will support attracting inward investment. The low carbon renewable research development at Hunterston is important in adding potential for Hunterston as a manufacturing and servicing centre.
- The strategic transmission grid at Hunterston justifies its identification as a national development.
- The spatial framework should contain options to expand current successful business activities.
- The success of Hunterston not only depends on the spatial framework but significant coordination of stakeholders and investment over a long period.
- Considered preference for green energy and tourism/sport/leisure/food production (oyster farm) developments
- Tourism uses should be supported at Hunterston.
- The current focus on energy results in little community benefit and allows operators at Hunterston to benefit without compensating communities.
- Hunterston is a fully licensed nuclear site providing a significant number of jobs. The current Scottish Government's anti-nuclear policy cannot last forever. NAC must continue to promote Hunterston for nuclear power and not simply allow the existing stations to be decommissioned and become a dumping ground for the UK's nuclear waste.
- A new nuclear build would give versatility to sourcing energy.
- The LDP should reflect a switch to renewable energy.
- Support the commitment to enhance environmental protection policies in LDP2.
- There is a basic contradiction in the proposals in LDP2 in that the development of Hunterston as an industrial, nuclear waste, wind turbine, rig decommissioning site etc. is promoted whilst at the same time tourism development, and particularly marine tourism is promoted in the same section. All of the proposals for Hunterston will severely impact on the surrounding area's tourism growth ambition.
- The proposals will have an adverse visual impact on Cumbrae and its economic and tourism potential. Future development should minimise impact on Cumbrae through appropriate planning controls.
- No consideration has been put forward to making sure Largs Kilbirnie A760 will be made safe for cyclist pedestrian with the increased lorry traffic this plan envisages
- Hunterston has proved to be a poor development because of the lack of flexibility. The pier head and approach are very specialised. Road access is particularly poor with Fairlie and West Kilbride being bottle necks. Access to the motorway system is protracted. Bulk goods are best moved by rail but the railway capacity is limited. The level crossing at Stevenston being a bottle neck and the line between Saltcoats and Stevenston can be closed by storms (climate change again). Access to a double line South via Dumfries would help. The Hunterston Link is for electrical power and is therefore not limited to electrical power.
- Biomass has been proved to be as dangerous as coal in terms of Carbon emissions. The construction yard could be used for decommissioning oil platforms.
- It is not clear if the biomass power station is related to a national strategy. This would potentially need to import the fuel by bulk carrier.

- There is opportunity to develop light industry around the Hunterston area. A representation expresses support for building oil platforms but comments that the site wasn't originally designed for this purpose.
- Hunterston is not a suitable place for wind turbines and threatens to destroy the Clyde as a world famous tourist venue. The existing so called test turbines are far too close to human habitation for safety. Renewable energy must work in harmony with the beauty of the Clyde Estuary - not destroy it.
- Fairlie Community Council opposes the MIR preferred options for Hunterston on the basis they are not reflective of community opinion and development in line with the MIR preferred options will cause significant damage to the coastal and marine environment.
- Solar energy generation facilities could be provided at Hunterston.
- The turbines at Hunterston have generated health problems for humans and animals that has not been dealt with, without generating positive socio-economic impacts on the local community.
- Grid reinforcements have not brought socio-economic community benefits
- Biomass is unsustainable and generates pollution and should not be supported.
- LDP2 should be in line with NPF3; not aspirations of NAC for the North Coast. A new nuclear build can only be allowed through a reversal of Scottish Government stance on new nuclear build facilities, meaning this cannot be supported by this LDP.
- Hunterston should be supported as a free port.
- Test turbines at Hunterston are an intrusion of the tourism potential of the area.
- SSE supports the preferred option to remove the time restriction on the wind turbine testing facility and is keen to work with NAC to support this approach.
- It is not clear that the scale of jobs at Hunterston is sufficient to support it being classified as a National Development in NPF.

Renewable Energy

Comments Planning for Renewable Energy

- **East Ayrshire Council** would particularly like to highlight the requirement to consider cross-boundary constraints and opportunities and **East Ayrshire Council** have been instructed to carry out further work in this respect with neighbouring local authorities to identify where strategic capacity extends from East Ayrshire into neighbouring planning authority areas. As this is likely to be important to North Ayrshire also, we would like to propose working together to look at cross boundary issues.
- **Scottish Water** supports the preferred option of developing a new spatial framework in line with Scottish Planning Policy. **Scottish Water** will provide consultation on the update of LDP policies and guidance for renewable energy.
- **SNH** broadly agree with the approach to renewable energy but recommend further work to develop the wind energy spatial framework is undertaken to develop the strategy in line with Scottish Planning Policy.
- Do not agree with bio fuel for many reasons,
- Other types could be considered remembering the area is close to SSSIs and residential areas.
- RSPB Scotland is supportive of the use of renewable energy, but believes that wind farms must be carefully sited to avoid negative impacts on sites and species of conservation importance. Policies should ensure that any new wind energy developments do not have adverse impacts on biodiversity and provide ecological enhancements. The spatial framework for wind energy should comply with Scottish Planning Policy and identify 'Strategic

Wind Energy Development Areas'. The framework should take account of other wind energy policy and strategy statements.

- Renewable energy burdens for new development should not exceed building standards requirements.
- District heating schemes should only be applicable for larger residential development proposals as opposed to smaller scale development.
- There should be no solar farm on Cumbrae at the Gleid Stane. Other locations may be more suitable.
- The MIR does not consider protection of rural areas, noise, visual and chemical pollution
- The MIR position on renewables (shown in maps) is out of sync with Scottish Planning Policy in seeking to establish buffer zones around Kilbirnie and Beith for renewable energy development. This restricts the tourism and community benefit communities can gain from such development. This representation further criticises the methodology for development of renewable energy maps, and disputes that there will be a negative impact on landscape and visual impact.
- The MIR position on renewable (shown in maps) is nonsensical, open to misinterpretation and oversimplified as it only offers 2km buffer round settlements.
- Offshore turbines should be a minimum of 15km from the coast to reduce negative health impacts.
- The policy framework should include support for solar panels to be installed at existing turbine sites to minimise landscape impact, and benefit from existing grid connections.
- The inclusion of a minimum height requirement for turbines (when considering the application of the policy framework) would encourage higher turbines being proposed.
- A maximum turbine height should be in place for turbines.

General Comments

Comments Additional Issues

General environmental (including minerals/coal related comments):

- **SEPA** has provided an extensive commentary on the suite of policies that exist in LDP1 and how they may be updated to form part of LDP2 – including on a range of the main issues. **SEPA** offers support through consultation in preparing LDP2. **SEPA** advises that it will object to the Proposed LDP if it is not framed in line with its representation – which is reflective of **SEPA's** operation policies and guidelines.
- **RSPB** would welcome the development of a policy that allows contributions from new developments to include offsite biodiversity enhancements to help strengthen and develop the green network.
- **RSPB** Scotland would consider that nationally and internationally protected areas for wildlife and nature reserves constitute sensitive receptors should be protected from potential impacts of unconventional gas developments through the creation of buffer zone.
- **RSPB** Scotland would welcome the development of strong policies to ensure the protection of important peatland resources in line with Scottish Planning Policy (SPP).
- The LDP should also set out an approach to support the capture of energy from waste in line with the objectives set out in Scotland's Zero Waste Plan 2010.
- The LPD should provide heat maps to support the development of heat networks.
- Support consideration of sustainability assessments such as BREEAM and EcoHomes to cover wider sustainability issues such as biodiversity, water efficiency and material use etc. We would welcome the development of a sustainability checklist for new development.

- The collapse of the opencast coal industry in Scotland in 2013 demonstrated the importance of securing appropriate financial guarantees for the restoration and aftercare of sites with significant long-term liabilities.
- Eglinton Country Park and protection of our Green Spaces should be covered in LDP2.
- Excessive regulation inhibits development. Planning process is too prescriptive, costly, time consuming and without focus on the type of development needed to encourage investment.
- The **Coal Authority** North Ayrshire Council area contains coal resources which are capable of extraction by surface mining operations. These resources cover an area amounting to approximately 13.96% of the North Ayrshire Council area. The Coal Authority is keen to ensure that coal resources are not unnecessarily sterilised by new development. Where this may be the case, The Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process.
- Within the North Ayrshire Council area there are approximately 976 recorded mine entries and around 19 coal mining related hazards have been reported to **The Coal Authority**. Mining legacy matters should be considered to ensure that site allocations and other policies and programmes will not lead to future public safety hazards. Land instability and mining legacy is not a complete constraint on new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable.
- The LDP should identify appropriate broad areas where surface coal extraction may be acceptable (paragraph 239 of SPP). Criteria in LDPs should not needlessly sterilise mineral resources; but should include criteria to encourage the prior extraction of surface coal resources where it is necessary for non-minerals development to take place within safeguarded areas (paragraph 237 of SPP). Specific policies for energy minerals, including policies to allow coal extraction proposals to be considered on their merits and suitable restoration (paragraphs 244 and 247 of SPP).
- The LDP should set out a policy approach for hydrocarbon extraction and identify any areas covered by a PEDL (paragraphs 240, 245 and 246 of SPP).
- The inclusion of suitable policies to ensure that all development proposals within coalfield areas take account of any coal mining-related land stability and/or other public safety risks and, where necessary, incorporate suitable mitigation measures to address them (paragraph 237 of SPP).
- The **Coal Authority** wishes to continue to be consulted both informally if required and formally on future stages.

Process and consultation related comments:

- MIR alternatives are either non-existent or designed to convey a choice that will not be adhered to. The LDP2 will not reflect those choices. The MIR and supporting documents appear designed to be confusing and difficult to understand, thereby discouraging engagement.
- Were no consultation events held in the Beith/Gateside/Barrmill area?
- Public meetings to consult with 'the public' are needed for these types of things and not solely dependent on familiar faces.
- The LDP2 should be more focused on sustainable transport and outdoor access and travel, promoting sustainable patterns of development – i.e. development located in places where it is accessible by sustainable transport means. Investment in public transport infrastructure should be support, including potentially funded by developer contributions.