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# REPRESENTATION ON THE SOUTH AYRSHIRE COUNCIL LOCAL DEVELOPMENT PLAN MAIN ISSUED REPORT 2017

**31 JANUARY 2018** 



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### 1. Introduction

- 1.1 Homes for Scotland (HFS) is the voice of the home building industry in Scotland, with a membership of some 200 organisations together providing 95% of all new homes built for sale across the 95% of all new homes built for sale and rent across the country. We all recognise that we need more new homes. To make Scotland a better place in which to live, work and invest, it is essential that we have enough homes in the right locations to meet the diverse housing needs and aspirations of our growing population.
- 1.2 HFS makes submissions on national and local government policy issues affecting the industry. Its views are endorsed by committees and advisory groups utilising the skills and expertise of key representatives drawn from our member companies.
- 1.3 These submissions on South Ayrshire Council's Local Development Plan (LDP) Main Issues Report (MIR) have been reviewed and agreed by HFS's Strathclyde Area Committee. This response only considers general matters relating to the delivery of new homes through the emerging LDP and sitespecific questions are not addressed.

### 2. The Emerging LDP Strategy

- 2.1 Any review of an LDP is an opportunity to embrace change and new opportunities and need not simply be a rolling forward of the current plan's vision and spatial strategy. That said, change for change's sake is in no party's interest and as such an appropriate balance must be struck.
- 2.2 Within South Ayrshire, the new opportunities that have emerged relate to the Ayrshire Growth Deal and other economic regeneration initiatives including the objective of bringing the UK's first Space Port to Prestwick. On that basis, HFS would support the emerging LDP in adopting a positive and ambitious outlook that reflects these significant opportunities.
- 2.3 However, the current spread of 'preferred housing development locations' does not align with market demands and aspirations. The simple reality is that private sector housing developers have a reduced confidence that any investment they may make in what could be described as 'development plan preferred' locations can ever deliver the returns they require to satisfy shareholders and board members and hence ensure that investment in new sites can be forthcoming.
- 2.4 Ensuring that investor confidence is supported (to allow an appropriate range and choice of housing sites to then come forward) is an essential target for this new plan and will be a key factor in avoiding a situation where elements of



- housing needs continues to go unmet. This necessity is acknowledged within the MIR and HFS fully supports the intended response of re-distribution of the housing allocations to more buoyant market locations.
- 2.5 An essential factor in the success of such a policy intent must therefore be effective and ongoing engagement with home builders as key partners in the delivery of the emerging plan.
- 2.6 The MIR also explores the Economic Outlook (described as Issue 1) and in setting out its preferred option defines "Encouraging and stimulating the housebuilding and affordable housing sector" as the fifth most important option (out of 9) to hep stimulate economic growth.
- 2.7 Whilst it is accepted that there is a need to set out options in a degree of priority, placing the delivery of enough new homes relatively low down the list of priorities could be interpreted as not recognising the important link between the delivery of those new homes and economic growth. Quite simply, the growth will not be achieved if enough new homes are not also delivered.
- 2.8 Therefore, whilst the physical delivery of the new homes and the direct economic benefit that activity will generate may be seen as a lower priority compared to the Growth Deal or Spaceport initiatives, the effect of bringing forward those new homes in the right locations will be an essential factor in the successful outcome of both initiatives.
- 3. Strategy for Housing (Issue 5)

Setting an Appropriate Housing Supply Target

- 3.1 HFS has undertaken a review of the Housing Technical paper that supports the MIR, part of which was to consider what the emerging Housing Supply Target (HST) should be. At this stage, a detailed analysis of the Housing Need and Demand Assessment (HNDA) has not been undertaken and the following is offered as a high-level view of some relevant matters.
- 3.2 The HNDA has anticipated an annual average housing need between 2016 and 2025 of 258 new homes per annum (Table 3 of the Housing Technical Paper). The Housing Technical Paper then helpfully sets out how an annualised average HST of 270 units can be arrived at (i.e. some 135 affordable units and a further 135 private units built on average each year).
- 3.3 However, SPP requires at para 115 that in setting the HST the development plan should also consider "wider economic, social and environmental factors, issues of capacity, resource and deliverability, and other important requirements such as the aims of National Parks."
- 3.4 Whilst the affordable element of the HST, in aligning with the Local Housing Strategy is probably reasonable, the lack of obvious consideration of the other factors listed in SPP para 115 in setting the private element needs addressed.



- 3.5 Two of these factors are the more up to date and slightly higher 2014 Scottish Household Projections and the expectations of delivery of new homes from the Established Land Supply.
- 3.6 The HNDA has been based on the 2012 Household Projections and whilst the 2014 Household projections would not have been available at the time of preparation of the HNDA, it is relevant to also review these now and draw some conclusion from them in formulating the position to be set for the emerging LDP. The 2014 Household Projections then indicated a slightly higher level of household formation than set out within the 2012 Projections.
- 3.7 The 2014 Household Projections are perhaps only a marginal consideration but they do support the quantitative assessment of need as set out within the HNDA. Given that the 2012 based household projections are heavily influenced by recession impacts including the inability of potential new home purchasers to access reasonable mortgage options, the more recent 2014 based household projections ought to be more heavily influenced by the beginnings at least of housing market recovery. However, the fact that the 2012 and 2014 based household projections are not significantly different could indicate that the housing market recovery within South Ayrshire is taking place at a lower rate than is evident in other parts of Scotland. That is then an important consideration in subsequently setting out allocations such that these can help bolster market recovery in South Ayrshire.
- 3.8 Under the current LDP, since 2011 there has been an average of 200 new home completions per annum. Over the 5 years between 2016 and 2021, the Council has anticipated an average of 544 new home completions per annum as stated within the published version of the 2016 Housing Land Audit (HLA). However, in reviewing the HLA, HFS has assumed that an average of only 364 completions per annum might be achieved from the sites set out within the 2016 HLA (see Annex 1).
- 3.9 One aspect of the HLA is to give an insight into market demand in terms of both location and rate; private home builders only bring forward sites in response to an expectation of new home sales. On that basis, it is evident that both the Council and HFS are more optimistic as to what could be achieved than the figures generated by the HNDA suggest.
- 3.10 In addition, given that many sites within the Established Land Supply are brownfield locations, bringing these forward for redevelopment is an important social factor.
- 3.11 There are therefore significant economic, social and environmental factors as well as obvious capacity for a higher private element of the HST to be progressed within the emerging LDP.
- 3.12 As noted above, the opportunities associated with the Ayrshire Growth Deal and other economic regeneration initiatives including the objective of bringing



- the UK's first Space Port to Prestwick would further support greater ambition for the HST.
- 3.13 Notwithstanding that the HST must reflect the total housing need that will be delivered through a plan period<sup>1</sup>, it is helpful in this analysis to consider annualised averages to give context to past performance and potential future performance of the South Ayrshire Housing Market.
- 3.14 Various alternative approaches to setting the HST can therefore be taken:
  - A target of an annualised average of 380 units (135 affordable units per annum plus 245 private units per annum) would align output rates with the HFS assumed average output from the Established Land Supply between 2016 and 2021.
  - A private HST of 320 units per annum would result in a total annualised average HST of 455 units which equates to the average of the Council's and HFS expectations of output between 2016 and 2021.
- 3.15 The residual Housing Requirement that the LDP must bring forward based on these options, and applying further adjustments regarding the potential outputs from the 2016 HLA based on the HFS analysis set out in Annex 1, would therefore be as follows.

Table 1: LDP2 Potential Housing Requirement

|   |  | Option 1:     | Option 2:                                  | Option 3:  |
|---|--|---------------|--|--|
|   |  | SAC July 2017 | HFS assumed<br>output levels<br>maintained | Average of SAC<br>& HFS assumed<br>output levels<br>maintained |
| Α | Housing Supply Target (2016 – 2029) (All Tenure)       | 3,510         | 4,940                                      | 5,915  |
|   | Annualised Average HST (2016)<br>(All Tenure)          | 270           | 380  | 455  |
|   | Private HST (2016 – 2029)                              | 1,755         | 3,185                                      | 4,160  |
|   | Affordable HST (2016 – 2029)                           | 1,755         | 1,755                                      | 1,755  |
| В | + 20% Generosity Allowance                             | 4,212         | 5,928                                      | 7,098  |
| С | Delivery Programme (2016 HLA + HFS edits) (All Tenure) | 6,329         | 6,329                                      | 6,329  |
|   | Residual Housing Requirement (B – C) (All Tenure)      | -2,117        | -401                                       | 769  |

### Allocating Sufficient Housing Land to Meet the Housing Supply Target

3.16 As part of the HFS review of the Housing Background Technical paper, consideration was also had of the potential to meet the HST from the

<sup>&</sup>lt;sup>1</sup> For example, see Scottish Planning Policy (<a href="http://www.gov.scot/Resource/0045/00453827.pdf">http://www.gov.scot/Resource/0045/00453827.pdf</a>) paragraph 116 and Stirling LDP Examination Report (<a href="https://www.dpea.scotland.gov.uk/Document.aspx?id=484322">https://www.dpea.scotland.gov.uk/Document.aspx?id=484322</a>) paragraphs 53 to 58, page 52)



- Established Land Supply and hence what further allocations are necessary to ensure that the Target will be met.
- 3.17 The quantification of the total Established Land Supply is not in question. That supply is made up of existing LDP sites as well as sites with known development potential because they have secured planning permission that may or may not still be extant, it is the realistic timing for, and rate of, delivery of sites that is addressed in Annex 1.
- 3.18 The Council has assessed that some 2,719 units are deemed effective, i.e. capable of being built between 2016 and 2021. However, a number of these sites have either a lapsed planning permission (and no evidence presented to indicate the permission has been implemented are renewed) or have assumed higher completion rates that is necessarily reasonable within the prevailing new home market.
- 3.19 The Council has expected that around 119 of the current 145 2016 HLA sites would deliver completions within the first 5 years. However, HFS has considered 60 of these sites could be non-effective and has raised a query on a further 29 sites. This has meant that some 2,010 units of the 2,719 units are disputed to some degree or other
- 3.20 The HFS estimate is that perhaps some 1,821 units are capable of being built between 2016 and 2021 or around 21% of the Established Land Supply and that represents a 33% discount compared to the Council's estimate.
- 3.21 Within Ayr, the HFS estimate is that the effective land supply may be around 859 units (and around 47% of the effective land supply) rather than the 1,162 predicted by the Council largely due to perceived over-ambitious programming of the larger sites in and around the town (a 26% discount compared to the Council's estimate).
- 3.22 There are 17 'large' sites, i.e. of a capacity of 100 units or more included within the 2016 HLA. The Council has anticipated that these sites could generate 1,495 new homes between 2016 and 2021. However, HFS has queried, or considered the sites to be non-effective, all but 2 of these sites and as such the HFS prediction is that these sites will only generate around 825 completions over the same period (see Annex 1).
- 3.23 This is then around 45% of the HFS predicted total effective land supply compared to around 55% of the Council's predicted total effective supply and reflects the inevitable commercial constraints facing these large strategic sites.
  - Maintaining an Effective Supply of Housing Land
- 3.24 The Scottish Government has withdrawn the draft Planning Delivery Advice (PDA) on housing and infrastructure that it had issued for consultation in 2016. That was to allow for better discussion on the most appropriate means



- to measure the delivery of housing land based on current Scottish Planning Policy (SPP) or emerging national policy that will follow on from the current Planning Review.
- 3.25 The Council's Housing Technical Paper includes a calculation that was included within the draft PDA which itself was drawn from the Heads of Planning Scotland's guidance on Planning Performance Frameworks (PPF). However, in transposing the methodology from the PPF to the PDA, the anticipation that an under (or over-supply) could also be considered as set out within the PPF guidance, was overlooked.
- 3.26 The major drawback of the calculation set out within the Housing Technical Paper, as referred to above, is that it presents a scenario that the LDP can never be compliant with SPP. Specifically paragraph 115 of Scottish Planning Policy (SPP), states that the HST can only be interpreted as the:
  - "policy view of the number of homes the authority has agreed will be delivered in each housing market area over the periods of the development plan and local housing strategy" (emphasis added).
- 3.27 By failing to consider any undersupply, the reality will be that the development plan may never deliver the number of houses it is required to by the end of the development plan period. The calculation then set out in the Housing Technical Paper is referred to as the uncompounded calculation and HFS strongly believe that a compounded calculation must always be used.
- 3.28 The Planning and Environmental Appeals Division published the Report on the Stirling LDP Examination on 29 November 2017 (LDP-390-2). The Reporters' conclusions on the question of how to calculate the effective land supply position support the HFS position (that a compounded approach must be adopted).
- 3.29 The conclusion set out at paragraph 54 on page 52 of the Report states:
  - "Omitting the shortfall in delivery does not appear to achieve any particular purpose other than to numerically achieve a lower target for this plan period. It does not address the fundamental issue of Scottish Planning Policy requiring the target and housing land requirement to be met in full, nor does it account for the unmet yet identified need and demand for homes in Stirling in the period 2010 to 2015."
- 3.30 Further down the same page at paragraph 58, the Reporter also concludes: "That gives rise to an annual target of 461 homes, although I find that housing supply targets should be considered over the whole plan period rather than annually."
- 3.31 It must also be noted that numerous Planning Appeal decision have been sympathetic to the compounded approach to calculate the effective land



- supply position. Relevant recent decisions include Appeals in West Lothian, Stirling and Renfrewshire<sup>2</sup>.
- 3.32 South Ayrshire Council has then indicated within the Housing Technical Paper that they believe that a supply of 2,719 units between 2016 and 2021 (as the 2016 HLA suggests) equates to a 5.3 year effective land supply. However, as such an approach is based on an un-compounded calculation of the effective land supply no account is had of under or over-supply in previous years and therefore a more accurate 5 year effective land supply target (at 2016) of 2,545 new homes must be used.
- 3.33 However, the current LDP requires that some 6,108 new homes are to be delivered between 2011 and 2023 (see: LDP policy: maintaining and protecting land for housing). Based on the position set out at paragraph 115 of SPP and reiterated only very recently in the Stirling LDP Examination Report, given that some 1,002 new homes have been completed between 2011 and 2016 (see; Table 2 of the 2016 HLA), some 5,106 homes would be left to be completed by 2023 based on the current LDP.
- 3.34 On that basis, the current five-year land supply target would then be 3,647 using a compounded approach and in line with SPP para 115 i.e. 5,106 / 7 x
  5. The Council's current estimate of land supply based on the published 2016 HLA would therefore equate to 3.7 years of effective land supply using a compounded approach.
- 3.35 The HFS estimates of outputs from the Established Land Supply would equate to 3.6 years of effective land supply using an uncompounded calculation but fall to 2.5 years supply based on a compounded (and SPP compliant) calculation.
- 3.36 However, SPP requires that an effective land supply is available at all times, i.e. from the date the emerging LDP is Adopted and at any other time thereafter until it is replaced. Table 5 of the Housing Technical Paper (again using the HFS estimates of outputs from the Established Land Supply) could therefore read as follows:

## <u>Potential Effective Housing Land Supply based on 2016 Housing Land Audit (incorporating HFS edits)</u>

|   | 2016 – 2021 | 2017 – 2022 | 2018 – 2023 | 2019 – 2024 |
|---|-------------|-------------|-------------|-------------|
| Potential Supply                                | 1,821       | 2,164       | 2,578       | 2,901       |
| Supply Target (Option 2 HST)                    | 1,900       | 1,918       | 1,929       | 1,864       |
| Number of years effective supply (Option 2 HST) | 4.8         | 5.6         | 6.7         | 7.8         |
| Supply Target (Option 3 HST)                    | 2,275       | 2,324       | 2,372       | 2,352       |
| Number of years effective supply (Option 3 HST) | 4.0         | 4.7         | 5.4         | 6.2         |

<sup>2</sup> See <u>PPA-400-2067</u>, <u>PPA-400-2071</u>, <u>PPA-350-2019</u> and <u>PPA-390-2046</u> (note the Appeal outcome is irrelevant to the question of how the effective land supply position ought to be calculated)



- 3.37 To be compliant with SPP (paragraph 115) the forward Supply Target requires to updated to take account of supply to the start date of any 5-year period. Therefore, the above figures suggest that there could potentially be a healthy supply of housing land within South Ayrshire at the point of likely Adoption of LDP2; between 6.2 years and 7.8 years of effective land supply at 2019 based on the HFS adjustments to the 2016 HLA.
- 3.38 However, as noted above, the current distribution of this supply does not match the expectations on marketability and demand as set out in the Technical Paper at Appendix 1 and Figure 1. The HMDA expects around 90% of need to arise within the Ayr Urban Housing Market Area but the 5 most marketable locations identified by HFS (Ayr, Troon, Prestwick, Symington and Monkton) are anticipated to only have around 68% of the effective land supply at 2019.
- 3.39 For this reason, HFS strongly supports the Council's continued efforts to redistribute the Established Land Supply to better align with the estimates of need and of market demand and HFS members will wish to fully engage with South Ayrshire Council on identifying reasonable opportunities to achieve this. That approach could also assist in a quicker housing market recovery in South Ayrshire, as market confidence is built up with both home builders and purchasers.

#### 4. Climate Change and Green Infrastructure

- 4.1 The matter of addressing climate change challenges and provision of green infrastructure as part of any new development is not explicitly addressed within the MIR but given progress with these matters across Scotland, it is relevant to give some consideration to the issues at this time.
- 4.2 HFS is fully supportive of the aspiration to continue to cut CO<sub>2</sub> emissions across Scotland and member companies have been leading research into, and deployment of numerous approaches. However, HFS views the key means to achieve this is for any efforts to be done strategically and in partnership with all industry sectors. Success will only be achieved where there is buy-in across all sectors and risks of unintended consequences are avoided or over ambitious expectations are set for a particular sector.
- 4.3 It will however also be essential to avoid circumstances where aspirations cannot be delivered due to the lack of sufficient infrastructure or misplaced expectations.
- 4.4 It is HFS's view that there must be a reasonable balance of the need to reduce CO<sub>2</sub> emissions alongside increasing the delivery of enough new homes of all tenures across Scotland and achieving sustainable economic growth that remains at the heart of national and local policy.



- 4.5 HFS continues to urge caution in how district heat networks are sought and whilst the objective of reducing carbon emissions from developments (through their construction and use) is supported, this must be through a pragmatic and balanced approach.
- 4.6 The reality will be that unless a development is close to an existing / proposed heat source, or part of a large mixed-use development with the potential to share / sell heat, an Energy Use / Sustainability Assessment should be sufficient to justify why a heat network is not possible. Spending time and money on a detailed feasibility study just to confirm that a heat network is not viable will delay much needed housing delivery.
- 4.7 The common assumption that a housing developer can also deliver this form of infrastructure and absorb the risks associated with it is also misplaced and inappropriate. It is essential that the expectations of housing developers and energy providers is clearly delineated and understood.
- 4.8 The reality of the situation is that as new homes become more energy efficient, heat demand will continue to fall. Therefore, delivering a heat network for a housing only development is unlikely to ever be economically viable to the state it would support investment in infrastructure from a district heat provider.
- 4.9 HFS recognise that the starting point on this matter is for new buildings to "avoid a specified and rising proportion of the projected greenhouse gas emissions from their use" which is part of the obligation currently set through Section 3F of the Planning Act.
- 4.10 Many home builders have been working towards this goal driven by the changes in Building Standards and significant improvements have been achieved in the overall energy efficiency of buildings. This is the 'fabric first' approach and such gains will be permanent improvements to a building. In some contrast then adding new installations (i.e. low and zero-carbon generating technologies) has the potential to be relatively temporary features which bring with them maintenance and user operation implications that could result in these simply being switched off.
- 4.11 There is also a risk that if low and zero-carbon generating technologies are required, the further gains in overall building energy efficiency that are possible will not be pursued given the arithmetic advantage that such technologies deliver within the SAP calculations undertaken as part of the Building Warrant process.
- 4.12 The Building Standards will also be continually reviewed and new standards to reduce greenhouse gas emissions will be progressed. It is unfortunate then that Section 3F of the Act appears to encourage the duplication of the activity of Building Standards in reducing emissions and in turn this makes the whole approach more confusing and bureaucratic for those demonstrating compliance and those assessing that demonstration. HFS also strongly



- agrees with the view that the duplication of legislation is contrary to the aims of the Regulatory Reform Bill, which seeks to simplify regulation and this section of the Act may yet to refined through the current Panning Review.
- 4.13 Nevertheless, it remains relevant that development plans promote the pursuit of more energy efficient buildings and developments to take forward the current obligations set out in Section 3F of the Act (i.e. new buildings are to "avoid a specified and rising proportion of the projected greenhouse gas emissions from their use") but in so doing, a pragmatic and proportionate approach must also be adopted.
- 4.14 For those reasons HFS would advocate that any policy response within the emerging LDP prioritises the "fabric first" approach with the use of low and zero-carbon generating technologies then only a secondary requirement where further effort is necessary to meet the relevant target set out in Building Standards.
- 4.15 Specifically, HFS does not support a detailed quantification of the reduction in greenhouse gas emissions from the use of the proposed development at the planning application stage because:
  - This would duplicate work that remains to be undertaken at the Building Warrant stage;
  - This could be unnecessarily expensive at a planning application stage;
  - The building performance targets may change as higher Building Standards are introduced between the planning application and Building Warrant stage;
  - A lack of expertise at the planning application stage means that the requirement could become a tick box exercise which discounts any value that the exercise may have had.
- 4.16 An Energy Use / Sustainability Assessment that sets out the site and building design approaches taken to reduce greenhouse gas emissions should be more than sufficient with identification of what, if any, additional low and zerocarbon generating technologies will also be considered as appropriate or necessary as part of the development.
- 4.17 The detailed assessment of actual levels of reduction that confirms these meet the relevant building standards will then only need to be undertaken at the Building Warrant stage.

#### 5. Conclusions

5.1 HFS continues to seek to work collaboratively with all local authorities across Scotland to assist in the identification of issues and opportunities in delivering enough new homes. The process of delivering those new homes involves



- many partners, the development industry being but one, and all need to work collectively if the challenge is to be met.
- 5.2 Within South Ayrshire, there are concern that the expectations of the Established land Supply have been overstated and this then runs the risk of setting the next LDP off in the wrong direction. Nevertheless, HFS welcomes the recognition that the current land supply distribution needs refined and more land allocated in areas of higher market demand. HFS and our members are fully committed to work with South Ayrshire Council to make this strategy work.
- 5.3 There is potential for South Ayrshire to find itself on a world stage if the Spaceport aspirations come to fruition and delivering the new homes to help support the economic growth that will come with that is a priority.









HFS Assumed output from Established Land Supply (2016 Housing Land Audit)

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| 2,                      |                 | 00   |        |                |                   |           |          |       |       |                 |                     |                   |  |                             |                  |          |                |                |             |           |                         |         |       |       |            |          |                          |                 |                      |                        |             |                           |              |                          |           |           | +              |                |                         |                        | 12                                | -                     | <b>o</b> c  | <b>D</b>                    |           |                            | 15              |               |                   |                        |           |               |               |                   |                           |                |               |              |                       |             |            |                    |
| 23<br>0                 | <b>1</b> 0      | 9 0  | 0      | 115            | 4                 | 0         | 0        | 0     | 0     | 7               | 4 ,                 | 4 0               | ,                                      | 4                           | 4 (              | 0        | 0              | 19             | 4           | 25        | 08                      | 100     | 130   | 40    | 0          | 0        | 0                        | 0               | >                    | 13                     | 7           | 30                        | -            | 55                       | 90        | 7         | 135            | 0              | 0                       | •                      | 28                                | 4                     |             | n ·                         | 4         | 4                          | 38              | 0             | 0 4               |                        | <b>10</b> | 0             | 0 0           | 0                 | 0                         | 4              | 45            | 6            | 0                     | 0           | 360        |                    |
| 16-23                   | 0               | o 4  | 25     | 65             | 0                 | - 8       | 73       | 25    | 17    | 7               | 0                   | <b>-</b>          | = 4                                    | <b>-</b>                    | 0 0              | 35       | 0 1            | 0              | ო           | 0         | 25                      | 0       | 0     | 0     | 30         | 20       | 9                        | 7               |                      | 0                      | 0           | 35                        | 34           | 50                       | 0         | 0         | 14 0           | e e            | 4                       | •                      | 10                                | •                     | > <         | -                           | 0         | 0                          | 10              | 12            | 0                 | , ,                    | <b>-</b>  | 0 ;           | 144           | 2                 | 0                         | 0              | 45            | 40           | 1-                    | 59          | 220        | 71.                |
| 2 22-23                 | 0               | 00   | 0      | 52             | 0                 | 0         | o &      | 0     | 0     | 7               | 0                   | 0 0               | 0                                      | 0                           | 00               | 9 0      | 0              | 0              | 0           | 0         | o 15                    | 0       | 0     | 0     | 15         | 0        | 0                        | 0 0             | >                    | 0                      | 0           | 20                        | -            | 0                        | 0         | 0 0       | 9              | 0              | C                       | >                      | 10                                | -                     | 0           | 0                           | 0         | 0                          | 10              | 9             | 0 0               |                        | 0         | 0             | 0 0           | 0                 | 0                         | 0              | 20            | 9            | 0                     | 0           | 20         | 0                  |
| 2 Z                     |                 | 9 0  |        |                |                   |           |          |       |       |                 |                     |                   |  |                             |                  |          |                |                |             |           |                         |         |       |       |            |          |                          |                 |                      |                        |             |                           |              |                          |           |           |                |                |                         |                        | 0<br>89                           |                       | t u         |                             |           |                            | <b>48</b> 0     |               |                   |                        |           |               |               |                   |                           |                |               |              |                       |             |            |                    |
| 1 pc                    |                 | 0 4  |        |                |                   | +         |          |       |       |                 |                     |                   |  |                             |                  |          |                |                |             | +         |                         |         |       |       | -          |          |                          |                 |                      |                        |             |                           |              |                          |           |           | ľ              |                |                         |                        | 9 0                               | •                     |             |                             |           |                            | 0               |               |                   |                        |           |               |               |                   |                           |                |               |              |                       |             | _          | -                  |
| 20-21 Ag                | 0 0             | 00   | 10     | 2 2            | 0                 | 0 0       | o 6      | 10    | 10    | 0               | 0 0                 | 0 0               | <b>o</b> 0                             | <b>-</b>                    | 00               | 10       | 0 0            | 200            | 0           | 0 0       | 00                      | 0       | 0     | 0     | 0          | 10       | 0 0                      | mc              |                      | 0                      | 0           | 0                         | c            | 0                        | 0         | 0 0       | - S            | 80             | o                       | >                      | 0                                 | c                     | <b>o o</b>  | 0 1                         |           |                            | 0               |               |                   |                        |           |               |               |                   |                           |                |               |              |                       |             |            |                    |
| 19-20                   | 0               | 00   | 10     | v <del>(</del> | 0                 | ω o       | א ני     | 2     | 2     | 0               | 0                   | 0 0               | ۷ (                                    | 0                           | 00               | 2        | 0              | 4 0            | 0           | 0         | 5 0                     | 0       | 0     | 0     | 0          | 10       | 9 9                      | 2 0             | >                    | 0                      | 0           | 0                         | c            | 0                        | 0         | 0 0       | ٠ <del>١</del> | 0              | c                       | >                      | 0                                 | c                     | o c         | 5 (                         | 0         | 0                          | 0               | 0             | 0 0               | · c                    | 0         | 0             | o K           | 2                 | 0                         | 0              | c             | 9            | 0                     | 0           | 20         | >                  |
| 18-19                   | 0               | 0  | 2      | 0 12           | 0                 | 7 5       | 2 0      | 0     | 0     | 0               | 0                   | 0 10              | 0                                      | 0                           | 0 0              | 0        | 0              | 0              | 0           | 0         | 0 0                     | 0       | 0     | 0     | 0          | 0        | 0 9                      | 9 2             |                      | 0                      | 0           | 0                         | 14           | 0                        | 0         | 0 0       | 0 0            | 0              | O                       | >                      | 0                                 | 0                     | > <         | 0                           | 0         | 0                          | 0               | 0             | 0 0               |                        | 0         | 0             | o K           | 0                 | 0                         | 0              | c             | 0            | 0                     | 0           | 20         | 0                  |
| -                       | 0               | 0 4  | 0      | 9              | 0                 | 0 1       | o C      | 0     | 0     | 0               | 0                   | 0 4               | 1 (                                    | >                           | 00               | 0        | 0              | 0              | က           | 0         | o c                     | 0       | 0     | 0     | 0          | 0        | 0 1                      | co co           | >                    | 0                      | 0           | 0                         | 7            | 0                        | 0         | 0 0       | 0 0            | 0              | 4                       | •                      | 0                                 | -                     | > <         | > 1                         | 0         | 0                          | 0               | 0             | 0 0               | , ,                    | >         | 0             | > 8           | 0                 | 0                         | 0              | C             | 0            | 0                     | 6           | 0          | 0                  |
| 9                       | 0               | 00   |        |                |                   |           |          |       |       | 0               |                     | 0                 |  | 0                           |                  | 0        |                | 0              |             |           |                         | 0       |       |       |            |          |                          |                 |                      |                        | 0           | 0                         |              | 0                        |           |           |                |                |                         | >                      | 0                                 | -                     |             | 0                           | 0         | 0                          |                 |               |                   |                        |           |               |               | 0                 |                           | 0              |               | 0            |                       | 20          |            |                    |
| T RE                    | ro c            | 9 4  | 25     | 180            | 4                 | - 8       | 23       | 25    | 17    | 4               | 4 ,                 | 4 5               | ļ ·                                    | 4                           | 4 4              | 35       | 0 1            | , <del>1</del> | 7           | 52        | o (†                    | 5 5     | 130   | 40    | 30         | 20       | 9 3                      | 28              | -                    | 13                     | 7           | 65                        | 34           | 22                       | 90        | _         | 25.0           | ( e            | 4                       | •                      | 89                                | 4                     |             |                             | 4         | 4                          | 48              | 17            | > 4               | •                      | ю         | - ;           | 7.7           | 2                 | 0                         | 4              |               |              | ξ.                    |             |            | +                  |
| BUILT                   |                 | 00   |        | 0 0            | 0                 | 0 1       | 0 0      | 0     | 0     | 0               | 0                   | 0 0               |  |                             | 00               | 0        | 0              | 0              | 0           | 0         | ی د                     | 0       | 0     | 0     | 0          |          | ST 0                     | 98 ~            |                      | 0                      | 0           | 4.                        | ď            | 0                        |           | 00        |                |                |                         |                        | 0                                 | -                     |             | -                           | o<br>î    | ET 0                       | 0               | 0;            | 4 C               | 0                      | >         | ∞ σ           | 0             | 0                 |                           | 0              | C             | 5.           | 0                     | 18          | 2          | > :                |
| SCENT                   | FERN ROA        | CRESCEN                                    |        |                | E ROAD            |           | 2        |       |       | RIDGE           | SIREE               | A STREET          | יייייייייייייייייייייייייייייייייייייי | ARK AVEN                    | ROAD             |          | ROAD           | Ħ              | ET          | 3ROVE     | KOAD                    |         |       |       | SE         |          | <del>\</del>             | SOUTH)          | PARISH               | LIS ROAD               | TREET       | SCHOOL, 2                 | CAD          | WAY ROA                  |           |           | 2              | , MAIN STREET  | O WALLED                | ON ESTATE              | (URUMLEY                          | DRUMLEY               |             | N COTTAG                    |           | MAIN STREI                 | ROAD            | OAD           | ROAD              | 16 AND 20              | AD        | OAD           |               | NDS DR            | NORTH-PR                  | O HELENA,      |               | ET B         | AMES ST               | TATION      | TROON      | SIREE              |
| ADDRESS<br>VICTORY CRES | RK STABLES, LIN | LAND AT CHURCH CRESCENT<br>109 MAIN STREET | DUN1   | DONS           | 11 DRYBRIDGE ROAD | FISH      | AYK KOAD | GIR2  | GIR3  | COALPOTS BRIDGE | 65 GLENDOUNE SIREE! | 5-9 DUNCAN STREET | THE DESIGNATION OF A CO                | LAND AT 2 NORTH PARK AVENUE | 40 PIEDMONT ROAD | KIRKM    | BOLESTYLE ROAD | LOW CAIRNHILL  | MAIN STREET | ARDLOCHAN | AKDLOCHAN KOAD<br>MAYB1 | MAYB2   | MAYB3 | MAYB4 | GARDENROSE | LADYLAND | KIRKLAND ST - ST.CUTHBEF | CULZEAN RD (SOI | MAYROI F OI D PARISH | CHURCH, CASSILLIS ROAD | 3A-5 CASTLE | FORMER REDBRAE SCHOOL, 24 | ALLOWAY ROAD | LAURELBANK, ALLOWAY ROAD | MIN       | MINZ      | DA A           | OLD MANSE, MAI | LAND ADJACENT TO WALLED | GARDEN, ADAMTON ESTATE | MAUCHLINE ROAD (DRUMLE)<br>HOUSE) | WALLED GARDEN DRUMLEY | 13 ANINDANK | LAND S/E OF STATION COTTAGE | MAIN ST   | FORMER GARAGE, MAIN STREET | GRANGEMUIR ROAD | 3 MIDTON ROAD | 43-45 MARINA ROAD | LAND BETWEEN 16 AND 20 | CROFTHEAD | 15 LINKS ROAD | SYM           | N.OF BREWLANDS DR | SYMINGTON ROAD NORTH-PRIV | ND ADJACENT TO | BOGEN<br>TAR1 | CROFT STREET | DAISYBANK 18 JAMES ST | DARLEY PLAN | NORTH EAST | 10 & 10A UNION STR |
|                         |                 | +  |        | ALD            | 4LD               | N S       | 2 7      | 7     | 7     | 7               |                     |                   |  |                             |                  |          | AEL            | ALD ALD        | ALD         | တ္ဆ       | Šπ                      | ļщ      | щ     | Щ     | Щ          |          | $^{+}$                   | t               |                      |                        |             |                           | ц            |                          |           | Ę         | 2 2            |                |                         |                        |                                   |                       |             | $^{+}$                      |           |                            | Š               | <u>5</u>      | 5 5               |                        | 5         | ž;            | 3 2           |                   | Н                         |                | NO.           |              |                       |             |            |                    |
| TOWN                    | DAILL           | DAILLY                                     | DUNDON | DUNDONALD      | DONDON            | FISHERTON | GIRVAN   | GIRVA | GIRVA | GIRVAN          | GIRVA               | GIRVA<br>DIRVA    | מאנוס פ                                | GIRVAIN                     | GIRVAN           | KIRKMICH | KIRKMICH       | KIRKOSWALD     | KIRKOSW     | MAIDENS   | MAYBOI                  | MAYBOLE | MAYBO | MAYBO | MAYBO      | MAYBO    | MAYBOLE                  | MAYBOLE         | 2                    | MAYBOLE                | MAYBOLE     | MAYBOLE                   | MAVRO        | MAYBOLE                  | MINISHANT | MINISHANT | MOTANOM        | MONKTON        | MONKTON                 |                        | MOSSBLOWN                         | NWOJBSSOM             | MOSSBLOWN   | MOSSBEL                     | PINWHERRY | PINWHERRY                  | PRESTWICK       | PRESTW        | PRESTW            | NO WEST STATE          | N N N     | PRESTWICK     | SYMING        | SYMINGTON         | SYMINGTON                 | SYMINGTON      | TARBOI TON    | TARBOLTON    | TARBOLTON             | TROOI       | TROON      | NOON I             |
| SA0513                  | SA0640          | SA0651<br>SA0668                           | LDP12  | LDP13          | SA0622            | LDP15     | SAUS80   | LDP17 | LDP18 | SA0516          | SA0543              | SAUSBB            | 000000                                 | SAUGIO                      | SA0633           | LDP19    | SA0511         | SA0148         | SA0519      | SA0333    | SAU605                  | LDP22   | LDP23 | LDP24 | SA0031     | SA0142   | SA0300                   | SA0364A         | 01000                | SA0569                 | SA0586      | SA0609                    | SA0624       | SA0665                   | LDP25     | LDP26     | 1 DP27         | SA0652         | SA0670                  | 0.000                  | SA0465                            | SAOR21                | 20000       | Scoope                      | SA0559    | SA0626                     | SA0035A         | SA0480        | SA0645            | CA0647                 | SAU047    | SA0661        | DP28          | SA0276            | SA0532A                   | SA0655         | 1 DP30        | SA0533       | SA0608                | SA0055      | SA0524     | SA0613             |

| ST<br>29          | _                          | _                          | _                                 | _            | ,-                   | 38     |
|-------------------|----------------------------|----------------------------|-----------------------------------|--------------|----------------------|--------|
| 1 PO:             | 0                          | 0                          | 0                                 | 0            | 9                    | 9 2,3  |
| TOTA<br>2016-2    | -                          | 12                         | 41                                | <b>∞</b>     | 0                    | 6,32   |
| 28-29             | 0                          | 0                          | 0                                 | 0            | 0                    | 390    |
| 27-28             | 0                          | 0                          | 0                                 | 0            | 0                    | 435    |
| 26-27             | 0                          | 0                          | 0                                 | 0            | 0                    | 498    |
| POST<br>26        | 0                          | 0                          | 0                                 | 0            | 9                    | 3,661  |
| TOTAL<br>16-26    | 1                          | 12                         | 4                                 | 8            | 0                    | 900'9  |
| 25-26             | 0                          | 0                          | 0                                 | 0            | 0                    | 268    |
| 24-25             | 0                          | 0                          | 0                                 | 0            | 0                    | 727    |
| 23-24             | 0                          | 0                          | 0                                 | 0            | 0                    | 999    |
| POST<br>23        | 0                          | 0                          | 0                                 | 0            | 9                    | 5,622  |
| TOTAL<br>16-23    | 1                          | 12                         | 14                                | <b>&amp;</b> | 0                    | 3,045  |
| 22-23             | 0                          | 0                          | 0                                 | 0            | 0                    | 626    |
| 21-22             | 0                          | 0                          | 0                                 | 0            | 0                    | 298    |
| Agreed<br>post 21 | 0                          | 0                          | 0                                 | 0            | 9                    | 6,846  |
| Agreed<br>16-21   | ,                          | 12                         | 41                                | 8            | 0                    | 1,821  |
| 20-21             | 0                          | 0                          | 0                                 | 0            | 0                    | 527    |
| 19-20             | 0                          | 0                          | 0                                 | 0            | 0                    | 484    |
| 18-19             | 0                          | 0                          | 0                                 | 0            | 0                    | 343    |
| 17-18             | 0                          | 9                          | 7                                 | 80           | 0                    |        |
| 16-17             | ,                          | 9                          | 7                                 | 0            | 0                    | 255    |
| REMCAP 16-17      | ,                          | 12                         | 41                                | æ            | 9                    | 8,667  |
| TOTAL RI          | 7                          | 0                          | 0                                 | 0            | 0                    | 824    |
| ADDRESS           | 31-35 WEST PORTLAND STREET | TOWER HOTEL, 23 BEACH ROAD | CROSBIE TOWER, 139 SOUTH<br>BEACH | NORTH DRIVE  | LAND AT DRUMDOW ROAD |        |
| TOWN              | TROON                      | TROON                      | TROON                             | TROON        | TURNBERRY            |        |
| SITE_REF          | SA0618                     | SA0623                     | SA0656                            | SA0664       | SA0625               | TOTALS |

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