

REPRESENTATION FORM

The following documents have been published by North Ayrshire Council and comments on them are now invited:

<p>Proposed Plan: Part 1</p> <ul style="list-style-type: none"> - Vision Statement & Spatial Strategy; - Development Management Statement-setting out general planning principles for each topic (Town Centres & Retailing, Housing, Employment Land etc.); and - LDP Maps. 	<p>Proposed Plan: Part 2</p> <ul style="list-style-type: none"> - General Policy; - Detailed Planning Policies for each topic (Town Centres & Retailing, Housing, Employment Land etc.); and - Auxiliary Policies.
<p>Proposed Plan: Part 3</p> <ul style="list-style-type: none"> - Action Programme; - Infrastructure Requirements Schedule; and - Schedule of Council Land Ownership 	<p>Supplementary Guidance</p> <ul style="list-style-type: none"> - Coastal Design Guidance; - Rural Design Guidance; - Neighbourhood Design Guidance; - Town Centre Design Guidance; - Ayrshire Supplementary Planning Guidance on Wind Farm Development; - Supplementary Guidance on Wind Farm Developments Phase 1; - Supplementary Guidance on Wind Farm Developments Phase 2; and - Mainland Affordable Housing Policy - Arran Affordable Housing Policy.
<p>Strategic Environmental Assessment</p> <ul style="list-style-type: none"> - Environmental Adoption Statement; and - Social & Economic Adoption Statement 	

All comments (i) in support of, or objection to any policy, proposal or other content of the Proposed Plan Parts 1, 2 or 3; (ii) on any provision of Supplementary Guidance or (iii) on the Adoption Statements are now invited. All representations should be made using this form. Representations should be limited to 2,000 words in length (not including supporting documents), and received by 4.30pm on Friday 24th June 2011. Note that there is no automatic opportunity to expand upon your representation later in the process.

Any supporting information relevant to your representation (such as technical assessments, plans etc.) should also be submitted with this form.

Proposed Plan

The Proposed Local Development Plan (the 'Proposed Plan') reflects the Council's settled view on land use policies and proposals to be taken forward and adopted as the LDP for the area. **Representations should therefore relate to a specific provision of the Proposed Plan.** This might be a specific policy, land allocation, or other specific paragraph or sentence which you support or object to. If you are raising an objection to the Plan, your representation should also make a recommendation for an addition, deletion or amendment to the Plan to address your issue.

If a representation makes a recommendation for an addition, deletion or amendment to the Proposed Plan which the Council does not accept, this will be treated as an 'unresolved representation'. The Council will summarise each unresolved representation and their response to it, before forwarding this information to Scottish Government for determination by an independent Reporter through an Examination. The Reporter will make recommendations on unresolved

objections which are binding on the Council. Following this process, the Local Development Plan will be adopted, which is likely to place in late 2012.

Supplementary Guidance

Comments submitted to the Council will be considered with modifications made to the Supplementary Guidance as appropriate.

The Supplementary Guidance will then be submitted to Scottish Ministers for adoption at the same time as the Proposed Plan.

Environmental, Social & Economic Adoption Statements

Further to publication of the Environmental Report and Social & Economic Report, Adoption Statements outlining how the findings of the original reports have been taken into account in the Proposed Plan have been published. Comments on these adoption statements are welcomed.

Representation Forms can be submitted:

In writing to:
Proposed Plan
Corporate Services- Planning
North Ayrshire Council
Cunninghame House
KA12 8EE

By email to:
LDP@north-ayrshire.gov.uk

Receipt of all Representation Forms will be acknowledged,

Name: **John Inglis**
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Q1. Does your representation relate to:

- The Proposed Plan (Parts 1, 2 or 3)? If so, go to Q2 **Yes.**
- Supplementary Guidance? If so, go to Q5
- The Adoption Statements? If so, go to Q7

If you are responding to more than one document, please use a different Representation Form for each document.

Q2. Please state the specific policy, proposal or other content of the Proposed Plan which your representation relates to (if more than one, please list):

Section 2 Vision and Spatial Strategy

Section 3 General Policy

Section 5 Housing

Section 6 Employment Land

Section 7 Tourism

Section 9 Natural Environment

Section 10 Infrastructure

Section 11 Auxiliary Policies

As contained in Proposed Plan Part 1.

Q3. Please provide full details of your representation. If your representation relates to more than one policy, proposal or content of the Proposed Plan, please state clearly which provision of the plan each of your comments refers to.

We wish to respond on the following items:

Section 2: Vision and Spatial Strategy

2.7 Tourism. With a possible introduction of RET the impact to the roads and the infrastructure of Arran should be quantified and an impact analysis prepared in advance.

2.8 Environment. The existing C.O.A.S.T. project must be specifically highlighted to ensure future support for this key activity.

2.9 Links. Mention is made of the Brodick to Lochranza road improvements but no timescale is included in the plan. The route from Lochranza to Blackwaterfoot is also a key tourist route and should be included. Road conditions regularly feature in visitor feedback and the deterioration is restricting the expansion for new visitors and is highlighted as a negative thought for returning visitors. This obviously has a significant financial impact on our businesses.

2.10 Council Estate. The existing council yard in Market road Brodick does not currently project a “welcoming” view to the island and if this could be relocated to another more suitable area, the site could be considered for “clean up” and development of either commercial or parking facilities.

Section 3: General Policy

3.1a Siting, Design and External Appearance. We support this approach whilst not ruling out the need to consider other sites in rural locations which provide “cost effective” solutions.

Section 5: Housing

5.11 NAC has accepted the idea of allocating land as building land conditionally with the land holder (ie for affordable housing) and has already put this into practice well before the publication of the plan. We can count that as a plus.

Arran has far more than enough land allocated for its needs but this land is banked by very few people and a large part of it by two people. NAC need to realise that banked land is no use to the community and that allocating land as building land is to give the land holder a huge unearned gift in the form of vastly enhanced value. It is particularly galling if the allocations go to inherited land which has the effect of enriching the already wealthy with a public gift, with no benefit to the communal good. ACC asked

that present allocations of building land be rescinded and new allocations made on a conditional basis (possibly the same land). This was refused! Could this be reconsidered?

We would like to explore the opportunities which may exist in terms of “encouraging” current land owners to develop the existing allocated land.

NAC have recognised the need for action in this area and recommend “that development commence within two years”

This could include the introduction of a “Community land tax” on land with planning permission which has not been developed after a reasonable period of time. This could be scaled to bring NAC some income in lieu of council tax and give them an incentive to consider other schemes. The suggestion of the “land tax” may also be a useful source of income to ignite a project for self financing housing.

Other conditions to discuss could be: no new planning permissions granted to existing land holders until previous land developments have been initiated to a significant level of completion.

Arran needs houses to let. Since there is very little private rental available IOAH should build homes at a commercial rent ie no subsidy and let all the people on the housing list who can afford it (possibly up to a third of the total) pay the full rent and thus leave affordable housing for the more needy or poorer paid which is what it is intended for. IOAH and NAC agree but where and when is the action? While they are short of funding this is a route which they could take now since rental will pay for the mortgage. This may be an issue that could be pushed if there was real, local democratic input to IOAH rather than a member on a remote committee answerable to no one.

Section 6: Employment Land

6.8 Policy 13, 14 and 15. The area at Invercloy could also be include in this section. NAC should also investigate the real requirement for Commercial land in other areas on the west of the island and prepare a position statement with potential sites for consideration.

The current site operators in market road have specific conditions imposed controlling screening and unsuitable material left visible which is not being enforced. This would enhance the visitors “first impression”.

Section 7: Tourism

7.2 Road conditions regularly feature in visitor feedback and the deterioration is restricting the expansion for new visitors and is highlighted as a negative thought for returning visitors. This obviously has a significant financial impact on our businesses. If RET is introduced the “day visitor” numbers will significantly increase and no recognition of this is evident in the plan. Arran is currently seen as a “longer stay destination”

7.7 Support for Golf is welcomed and sailing should also be recognised as a major attraction for tourists. The Lamlash Marine area specifically.

Section 9: Natural Environment

9.4 Future land reviews through third parties should included compulsory consultation conditions with the Community Council and or local residents to ensure their views are recorded and considered prior to preparation of the third party report.

We also need to look at NAC guidelines for building in the countryside but, at the same time, stress that NAC must not continue to solely use private consultancies to draw up plans or guidelines for Arran without consulting at least the ACC ie someone who will take the position based on what is best for the island as a whole.

Section 10: Infrastructure

10.8 Zero waste plans -

How can we initiate village schemes for green material re-cycling and how can we engage with other island groups (Forestry, Brodick Castle) to build a pilot? Submit request to NAC to confirm current costs for present process. Prepare a cost benefit analysis? What opportunities are open to allow a waste treatment facility to provide heating being incorporated with residential developments in the future?

10.11 Renewable Energy. We would like to discuss the current process for planning review of wind farms to establish if the existing areas identified for development can be revised to restrict developments which are visible from public areas. We would also request that future planning applicants should be required to provide a visible simulation on site for height and colour of proposed installation. The colour of the pods should be considered in the same manner as building finishes ensuring they blend into the areas.

We are not against the introduction of wind power but want the consultation process to include local views and ensure that the control of the sites protects the local residents' environment and ensure that the scenic value of the island is not adversely impacted. As with other development proposals the views of the locals should have a major influence in the final decision. We would also like to develop what opportunities for funding are open to the community to install either wind or hydro systems which will enhance the local environment. We should also contact the hydro board to establish the current power consumption and any projected needs if available. This would assist any needs projections and help establish internal and external capacity utilisation projections of the resource.

Section 11: Auxiliary Policies

Policy P1. 9 please refer to above item to ensure that the Views of the local residents are included in any third party study before the study report is released.

Q4. What change(s) to the Proposed Plan would address your concerns? This might be a specific addition, deletion or amendment to wording or mapping in the Plan:

1. Recognition that all third party studies should include a requirement for the local views to be included at the earliest stage and certainly prior to any draft or initial response being published.
2. Options should be developed to reduce the impact of "Land banking" on the supply of housing on the island.
3. Recognition of the cost and environmental impact of current waste treatment practices should be established and discussion held to explore local options and incentives to reduce this possibly in conjunction with either heating or power generation for new developments. Grant assistance for new ventures in this area should be explored
4. Amendments to the existing land allocations for wind farms should be made to minimise the visual impact of these installations.
5. Prepare a plan for road repair and development on the island including relevant costs to enable support funding submissions
6. Regular reviews of the data with the community council to ensure that any changes variations in the plan are proactively handled to ensure the aims of the plan are achieved.

Q5. Which Supplementary Guidance Document does your representation refer to? Please use separate Representation Forms if you wish to comment on more than one Supplementary Guidance document:

Q6. Please provide full details of your representation on the Supplementary Guidance below:

Q7. Please state which Adoption Statement your representation refers to:

Q8. Please provide full details of your representation on the Adoption Statement below:

