

Symington Community Council
31 Main St
Symington
South Ayrshire KA1 5QE
29 April 2020

Dear Sirs,

Over this past few years Symington has been targeted by developers wishing to gain planning permission for major housing developments. The intention being to build on greenfield land on the outskirts of our village. The village is attractive to developers because of its proximity to the M77, a direct link to Glasgow. There has been a major development within the village which is now nearing completion. We therefore have first-hand experience of all aspects of the planning system from both a Local Council and DPEA perspective.

We would hope therefore that, as a result of our experience, the following points be given serious consideration and addressed in NPF4.

1. **Planning Applications** – Major Developments that have been rejected by both the Local Authority and the DPEA Reporter should have a minimum time restriction for re application placed on them. This will ensure that Developers cannot immediately submit applications for the same site again and again. This results in a waste of public official's time and tax payers money.

A recent case brought by Gladman Developments for a site on Brewlands Road, Symington initially started its journey through the planning system on the 11th July 2017. The planning application was rejected twice by the Local Authority and Full Council and finally rejected by a senior DPEA Reporter on 3rd February 2020. The same site outwith the village boundary was again submitted for consideration to the Local Authority on the 3rd March 2020, exactly one month to the day from its Appeal to the DPEA being refused. This practise surely cannot be allowed to continue.

2. **5 Year Housing Land Supply Methodology** – We would like the government to address the issue of methodology in calculating the housing land supply. A clear and definitive decision one way or the other stipulating what calculation is to be used by both local authorities and developers.

This ruling would resolve the eternal argument over the use of

- a) the compound methodology preferred by developers or;
- b) the non-compound methodology used by the majority of the 32 local authorities in Scotland.

In the Scottish Governments Housing Land Audit Research Paper 2019, a survey of all 32 local authorities was taken. There was a 100% response rate. Most authorities sought firm guidance in the calculation of the Housing Land Supply, with their preferred non compound method receiving positive response.

To conclude it was felt by local authorities that current guidance is vague and can lead to different and conflicting methodologies. This reportedly can lead to different interpretations by different Reporters.

Looking at DPEA appeals for major developments the methodology is brought into question time and time again by developers. Perhaps the exact figure where this lack of clarity is used as one of the grounds for Appeal could be identified by the DPEA.

These two issues we believe should and need to be addressed going forward. These are simple changes to make that would alleviate pressure on both the planning system and communities, and would provide clarity for all concerned.

Symington Community Council