

**EAST AYRSHIRE COUNCIL**

**CABINET 16 SEPTEMBER 2020**

**Report by the Depute Chief Executive and Chief Financial Officer**  
**Economy and Skills**

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**SUBJECT: FLOODING IN EAST AYRSHIRE AND THE IMPLICATIONS OF  
CURRENT POLICY ON THE FUTURE DEVELOPMENT OF EAST AYRSHIRE'S  
COMMUNITIES**

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**1. PURPOSE OF REPORT**

- 1.1 To present to Cabinet for its consideration and approval, a detailed report which gives (i) an overview of flood risk within East Ayrshire's communities, (ii) an outline of current planning policy for areas that are liable to flood, (iii) using Kilmarnock as an example provides a detailed analysis of the implications that existing policy guidance has on its future planning and development, and (iv) on the basis of the analysis makes recommendations as to the approach the Council should take as it begins preparation of its next Local Development Plan.

**2. RECOMMENDATIONS**

**2.1 It is recommended that Cabinet**

- (i) Note the planning and development implications of current flood risk guidance for East Ayrshire's communities and the very serious implications that flooding and flooding policy will have on the future development across East Ayrshire;**
- (ii) Agree that the Council, through the Chief Executive open discussions with SEPA and the Scottish Government to examine the issue of flood risk within East Ayrshire's communities and the opportunities for preparing a strategic flood mitigation strategy for East Ayrshire;**
- (iii) Request that officers of the Council prepare detailed analyses of flood risk for all affected communities in East Ayrshire and agree that these are considered as part of the LDP2 preparation process;**
- (iv) Review the Kilmarnock Town Centre Strategy to take account of flood risk and ensure that the implications of any proposed demolition of buildings within the town centre are considered;**
- (v) Agree that a final determination on Brown Street/Nelson Street, Newmilns, will be presented to members for consideration in November 2020 as part of the Strategic Housing Investment Plan following a further detailed engagement with SEPA within the wider strategic context of East Ayrshire as detailed in this report;**

- (vi) **Continue with the LDP2 work to prepare a strategy for South Central Kilmarnock working in partnership with the Scottish Land Commission and integrate the strategy with that for Kilmarnock Town Centre;**
- (vii) **Prepare a costed master-plan including a comprehensive Traffic Impact Analysis for the Bellfield East Economic Growth Area as identified in the East Ayrshire LDP taking account of the requirements of the Ayrshire Growth Deal and any wider strategic flood mitigation strategy work;;**
- (viii) **Agree that an update on all of the above actions should be included in appropriate Service Improvement Plans for 2020/21 with a progress report to Cabinet on at least an annual basis; and**
- (ix) **Otherwise note the contents of this report.**

### **3. INTRODUCTION**

- 3.1 Flooding has been a long standing problem within our communities. Severe flooding has been recorded in the nineteenth, throughout the twentieth century and now into the twenty first century but with climate change very much in evidence it is anticipated that the incidence of flooding will increase unless steps are taken to manage and mitigate the problem. The issue is therefore current and serious and will likely become even more so in the future. How East Ayrshire Council in particular responds to the challenge of flood risk will therefore have a significant influence not only how our communities develop and the pace and scale of regeneration but will provide challenges to the Council which will impact on economic growth within the affected areas.
- 3.2 The recently approved Main Issues Report (MIR) for the East Ayrshire Local Development Plan 2 (LDP2) refers to flooding frequently. There is a general reference to the incidence and severity of flooding as a result of climate change throughout East Ayrshire; notwithstanding it identifies 2 key locations where the issue is, or potentially could, inhibit redevelopment and growth.
- 3.3 The first location is South Central Kilmarnock. This area was once a thriving business, employment and residential community within easy walking distance of the town centre. It has since declined with many former industrial and business sites being cleared awaiting a new use. Significant civil engineering works were undertaken in the 1990's to erect flood walls and defences to protect these areas but the impact of climate change has already become evident. One of the most serious events involved flood circumventing the flood defences in the Howard Park area upstream of these defences and inundating streets and properties in the locality. The flooding was caused by an event greater than what the defences were designed for.
- 3.4 Whilst the reasons for decline within South Central Kilmarnock are complex and varied, it is probably flood risk that is the most serious issue that is holding the area back at the present time. The challenge is *how*, as a Council, we manage

the issue of flood risk and what route we wish to take to plan for and help regenerate this area.

- 3.5 The second area specifically identified to the proposed growth area to the east of the Bellfield Interchange. Whilst this area is probably the most accessible location in East Ayrshire it is also affected to a degree by flooding and flood risk. Trunk and 'A' roads in the vicinity of the Bellfield Interchange are particularly affected. As with South Central Kilmarnock the issue of flooding will need to be resolved if the full economic and development potential of this area is to be realised.
- 3.6 Whilst the MIR identifies these two locations because of their significant potential to accommodate new development there are other locations within East Ayrshire where development is being constrained. The recent Committee report on Brown Street, Newmilns highlights that the proposed Council housing development of a brownfield site without associated approved mitigation measures will no longer be supported. This is due to the revised flood modelling adopted by SEPA which now identifies that the area is susceptible to flooding. Accordingly it cannot be emphasised enough that the issue of flooding is an extremely serious one for East Ayrshire. How it is tackled will stretch the ingenuity and resources of the Council and its partners and may well prompt the Council to take actions which, until even relatively recently, it would not have contemplated.
- 3.7 It is within this context that an alternative approach to planning for flood risk is proposed in this report. This proposed approach will have to be explored further to determine whether it is viable but what is clear at the outset is that it cannot be pursued by the Council in isolation and will require the support of a range of organisations, not the least SEPA and the Scottish Government.
- 3.8 This report focusses on Kilmarnock. It does so primarily to make the report more manageable and more easily digestible for officers and elected members. It is very important however to recognise that the risk of flooding exists in other communities within the Irvine Valley and also within communities elsewhere within East Ayrshire but which are located within different river catchment systems. The principles detailed in this report as it applies to Kilmarnock can therefore be applied to these other flood risk communities although for obvious reasons the detail cannot.
- 3.9 Consequently this report provides a summary of:-
  - A brief outline of the extent of the flooding problem within East Ayrshire;
  - A review of Scottish planning policy and SEPA's policy stance on flooding;
  - Recent modelling and flood proposals prepared by ARA; and
  - A detailed assessment of the flood risk within Kilmarnock and environs and an assessment of the implications for its future development arising from application of national planning guidance and SEPA's guidance.
- 3.10 It concludes by outlining a potential alternative approach to managing flood risk and details what steps the Council will need to take to manage flood risk.

#### 4. THE EXTENT OF THE PROBLEM

4.1 The Ayrshire and Solway Local Flood Risk Management Plans were prepared in 2016. They were prepared by the relevant local authorities to implement the provisions of Flood Risk Management (Scotland) Act 2009. They detail actions by a range of partners to avoid and reduce the risk of flooding within all flood vulnerable areas within Ayrshire but they also identify the extent of the problem in Ayrshire. The extent of the flood risk problem from rivers is summarised in the table below. For clarity this information has been extracted in full from the Flood Risk Management Plans.

Location	No. of Residential and Non- Residential Properties at Risk of Flooding	Annual Average Damages
<b>Kilmarnock (including Hurlford)</b>	1,300	£1,200,000
<b>Newmilns and Greenholm</b>	420	£550,000
<b>Galston</b>	400	£620,000
<b>New Cumnock</b>	20	£490,000
<b>Catrine</b>	210	£270,000
<b>Dalmellington</b>	80	£110,000
<b>Cumnock and Logan</b>	70	£160,000

4.2 The risk of flooding from surface water run-off is also given. The extent of the problem of flooding from this source is provided in the table below.

Location	No. of Residential and Non- Residential Properties at Risk of Surface Water Flooding	Annual Average Damages
<b>Kilmarnock (including Hurlford)</b>	560	£460,000
<b>Newmilns and Greenholm</b>	70	£260,000
<b>Galston</b>	120	£290,000
<b>New Cumnock</b>		
<b>Catrine</b>		
<b>Dalmellington</b>		
<b>Cumnock and Logan</b>	140	£360,000
<b>Kilmaurs</b>	40	£10,000

4.3 Whilst the above tables highlight the financial costs these do not in any way assess the devastating impact flooding can have on the lives and wellbeing of all those families affected. Being flooded out can be a very traumatic experience and can disrupt the lives of families and those affected for many months. Unfortunately some families have had to deal with being flooded on a number of occasions.

4.4 The potential economic implications that the risk of flooding may have for each of the settlements listed are also significant. Economic growth is a key priority for the Council, yet the presence of flood risk has and is likely to act as a

deterrent to inward investment and the expansion of existing businesses. For example Cumnock town centre is considered to be of strategic importance and, whilst recent improvements have been made such as the redevelopment of the Glaisnock Centre, the presence of flood risk means that large parts are in effect not developable. Similarly the Stoneygate area of Newmilns is the location of a number of key manufacturing and engineering companies. The development of land there has been constrained by flood risk, meaning that physical expansion of businesses is often not possible. Parts of Galston, Darvel, Dalmellington and other towns are similarly affected.

- 4.5 The areas within each community at risk of flooding (as would be expected) generally lie adjacent to or are in close proximity to rivers and water courses. Newmilns, to give another example of the impact that flood risk can have on future planning, is prone to localised flooding during prolonged inclement weather. Updated SEPA flood maps and the Irvine Valley Flood Model (see section 5 below) has recently identified that areas of ground which were previously considered as developable sites and which were included as part of the current Local Development Plan are now subject to more onerous flood constraints. One such site is Brown Street/Nelson Street which was identified as suitable for new housing. The Council's Developer, CCG, and their Engineers engaged and consulted extensively with SEPA from June 2017 to November 2019 with regard to the development proposals for Brown Street/Nelson Street Newmilns. Despite the Design Team's concerted efforts, and the consultation and engagement that has taken place over an extended period, SEPA have confirmed that they will not on the basis of the revised and updated flood maps permit development within the flood plain.
- 4.6 The Scottish Government has previously provided grant funding in the sum of £188,977.39 for works associated with the delivery of new build affordable housing on the Brown Street site. This sum would have reduced the total expenditure of the Council to £443,775.54. However, the Scottish Government has confirmed that the full amount of £188,977.39 will require to be returned. A letter was therefore submitted to the Scottish Government on 26 August 2020 requesting their consent to retain the grant sum already received. A response is awaited. Currently, the Council's exposure amounts to £633,000 for enabling works associated with the delivery of the affordable housing on a site that was identified only a few years ago as being suitable for development.
- 4.7 The areas within all communities most significantly affected by flood risk are listed below. (details for Kilmarnock are given later in the report):-

**Newmilns and Greenholm:** All streets lying between Loudoun Road and the River Irvine including Irvine Road, Loudoun Road West and Riverbank Street; Main Street and Kilnholm Street; Greenside/The Green; Brown Street; and Nelson Street.

**Galston:** Titchfield Street, Cross Street and Polwarth Street; Western Road, Ladyton Drive; Portland Park and the playing fields to the west; most areas lying immediately adjacent to the Burn Anne.

**Darvel:** Morton Park and the lower end of Ranouldcoup Road nearest to the River Irvine; Glenbrig.

**Catrine:** most of the low lying central area and around the former mill site; Riverside Villas, and Co-operation Avenue.

**Cumnock:** Areas in the vicinity and boundaries of the Secondary School including Thistle Business Park and former bus garage; car park areas next to Rothesay House; Warrick Drive; and Cumnock Juniors Football Club.

**New Cumnock:** Much of the central area between Bridgend and Castle.

**Dalmellington:** Ayr Road particularly the area near to the junction with the B741; Cathcartson; and High Street.

**Patna:** All of the low lying areas near to the River Doon (most of which are undeveloped although some properties do fall within the flood risk area on Doonview Terrace and Jellieston Terrace).

- 4.6 Flood protection works have been undertaken in Galston in the past and more recently to protect the new primary school. Substantial flood defence works have been completed or are on site in New Cumnock. More recently, a strategic approach to flood protection has been followed and has involved the creation of a flood model for that part of the Irvine Valley within East Ayrshire.

## 5. THE IRVINE VALLEY FLOOD MODEL

- 5.1 The Irvine Valley Flood Model was completed by Ayrshire Roads Alliance (ARA) on behalf of the Council with assistance of flood consultants. The model was approved by SEPA in January 2018.
- 5.2 The Council's consultants RPS (Ireland) Ltd were then commissioned to produce a report to establish if schemes could be developed which offered a 1 in 200 year level of protection to communities with or without an allowance for climate change prior to the scheme being approved. Unfortunately there were no cost beneficial options available for 1:200 year flood level events. When this was considered at that time the decision was made to examine lower levels of protection which could be shown to be cost beneficial (and hence more likely to receive funding). That showed that a scheme could be developed for the Irvine Valley for a 1:100 year level of protection. Their report has been submitted to and has been approved by SEPA although they have recommended further work on how the resilience of any future development that may be constructed behind the flood protection proposals can be improved. Following review, SEPA forwarded the report to the Scottish Government to start the process of securing the necessary prioritisation for funding.
- 5.3 The next stage of the study work is to design detailed proposals to reduce the risk of property being flooded by the River Irvine. This work will commence

when and if prioritisation for funding has been approved. Once designed, the Approved Scheme could be put out to tender.

- 5.4 However, the Scottish Government has indicated that Cycle 1 funding for current schemes will not complete until 2028. The proposed scheme submitted for prioritisation by the Council via ARA would be in cycle 2 of any Scottish Government funding. This will mean that even if the Council was successful in obtaining grant support, phased flood protection works are unlikely to be completed until the mid-2030s.

## 6. NATIONAL PLANNING POLICY

- 6.1 Scottish Planning Policy (SPP) was published in June 2014, well before the most recent flood maps produced by SEPA. Scottish Planning Policy (SPP) is scheduled for review and will be incorporated into the next National Planning Framework (NPF4).

- 6.2 As it stands SPP identifies 4 key principles for managing flooding, namely that planning should:-

- take a precautionary approach to flood risk and take account the predicted impacts of climate change;
- direct development away from functional flood plains and areas liable to a medium or high risk of flooding;
- take steps to reduce the likelihood of flooding; and
- adopt policies to minimise the risk of surface water flooding.

- 6.3 It includes a flood risk framework (paragraph 263) to guide future development. In summary the framework states that:-

- in areas of little or no risk – there are no flood related constraints on development;
- in areas of low to medium risk (i.e. areas that have less than a 0.5% Annual Probability or AP) of flooding, most forms of development are acceptable other than civil infrastructure or most vulnerable uses such as police or ambulance stations, hospitals, schools, nurseries and care homes;
- in medium to high risk areas (i.e. greater than 0.5% AP) residential, institutional, commercial and industrial development may be suitable within built-up areas *provided* flood protection measures to the appropriate standard already exist and are maintained, are under construction, or are a planned measure in a current flood risk management plan. It adds that these areas may also be suitable for some recreational, sport and amenity uses *provided* appropriate evacuation procedures are in place. They are not suitable for civil infrastructure or most vulnerable uses.

- 6.4 However, it is of significance that paragraph 263 of SPP also states that, **“Where development is permitted [in medium to high risk areas] measures to protect against or manage flood risk will be required and any**

**loss of flood storage capacity mitigated to achieve a neutral or better outcome”.**

- 6.5 Paragraphs 264 of SPP and those following provide further guidance on flooding issues.
- 6.6 In future SPP will be incorporated into the next National Planning Framework (NPF4). The first draft of NPF4 will not be made available until September 2021 and a position statement is likely to be made available later this year but to date there is no indication as to what changes if any will be made to national policy to manage flooding.

**7. SEPA POLICY GUIDANCE**

- 7.1 One of the prime objectives of SEPA is to ensure, through its planning functions, that flood risk is reduced and in so doing promote the health and well-being of the people of Scotland. Accordingly, it advises that development should be avoided in areas at medium to high flood risk of flooding, from any source, unless it accords with the SPP risk framework.
- 7.2 For Local Development Plans (LDP's) it recommends that a Strategic Flood Risk Assessment (SFRA) is prepared so that it can inform the plan's Strategic Environmental Assessment (SEA), its spatial strategy and development allocations.
- 7.3 It expects LDP's to support the delivery of relevant objectives and actions within Flood Risk Management Strategies and Local Flood Risk Management Plans.
- 7.4 With regard to allocating sites with LDPs, SEPA's advice is that development should be avoided in areas at risk of flooding.

“This means that:

- a) sites should not be promoted in areas at medium to high risk from fluvial or coastal flooding [all areas south of Glencairn Square and to the west of Titchfield Street and High Glencairn Street, Kilmarnock and some areas to the east of the Bellfield Interchange];
- b) any sites that are being promoted for civil infrastructure should not be allocated in low to medium risk areas [all of the town centre within the one way system and to the east of Titchfield Street, Kilmarnock];
- c) any sites that are being promoted in low to medium risk areas that fall within the most vulnerable uses [police stations, hospitals, schools, care homes etc.] are only allocated if there is potential for the hazard to be alleviated through appropriate mitigation...Where this is not possible, some types of development may be acceptable if it satisfies the requirements of the risk framework (SPP, paragraph 233). The risk framework should be applied within the context ... [of] paragraph 264 of SPP and our Land Use Vulnerability Guidance...”

- 7.5 The SEPA Land Use Vulnerability Guidance assesses uses in terms of its vulnerability to flooding. There are 5 categories from Most Vulnerable Uses to Water Compatible uses. A full extract is provided in Appendix 1.
- 7.6 Some of the most vulnerable uses are listed in part 'c' of the above paragraph; buildings used for dwelling houses and other forms of residential uses (e.g. hotels and hostels) are included in the next, highly vulnerable category; least vulnerable uses includes shops, restaurants, offices, general industry and storage and distribution.
- 7.7 Where development is proposed in flood risk areas SEPA, would expect a Flood Risk Assessment (FRA) to be undertaken to inform the siting, design and capacity of development in a "way that avoids an increase in flood risk on and off site and ensures that there is a safe dry pedestrian access and egress at times of flood".
- 7.8 For areas that are not specifically identified or allocated in a LDP the guidance states that:-
- "a precautionary approach is taken to flood risk from all sources taking account of the predicted impacts of climate change;
  - "development is avoided in locations at medium to high flood risk (unless it accords with the risk framework in paragraph 263 of SPP) or where it would lead to an increase in the probability of flooding elsewhere;
  - "a Flood Risk Assessment (FRA) is required for all developments at risk of flooding from any source in medium to high risk areas and developments in low to medium risk areas identified in the risk framework (i.e. developments located in an area at the upper end of the probability scale, essential infrastructure and the most vulnerable land uses)..."
- 7.9 For areas protected by a formal flood protection scheme (as is the case in Kilmarnock, Galston or New Cumnock) it advocates a precautionary approach but provides more detailed guidance as to the type of development that would generally be acceptable within protected areas. The type of acceptable development is dependent on the standard that the flood protection scheme was built to.
- 7.10 It states that within areas protected by schemes built to less than a 200 year standard the following uses would be generally acceptable:
- "water compatible uses; or
  - "essential infrastructure designed to remain operational during flood event[s]; or
  - "the principle of the development allocation has been established in an up-to date, adopted Strategic Development Plan or the National Planning Framework with due consideration to flood risk; or
  - "any other development that does not increase overall flood risk."

- 7.11 In areas protected by a scheme giving a standard of protection of 200 years the above uses are generally acceptable to SEPA but the list includes least vulnerable uses (shops, restaurants, offices, generally industry etc.). Similarly within areas protected by schemes designed to a greater than a 1 in 200 year standard plus climate change highly vulnerable developments could be accepted (i.e. a range of residential uses).
- 7.12 Most vulnerable uses “must be avoided in areas protected by a scheme”.
- 7.13 However in relation to *new* developments, SEPA have indicated that in areas protected by a flood defence scheme that meets the 1 in 200 plus climate change standard they would expect the footprint of the new development or land that the new development sits on to be raised to ensure that it remained safe even if the defences failed for some reason. In other words, flood defences, if built, would protect *existing* development; *new* developments given these mitigation requirements, would struggle to be viable.
- 7.14 In summary, therefore whilst guidance within SPP or from SEPA gives some encouragement, on the one hand, to the potential for new development to be constructed behind flood protection schemes (designed to the highest standards), the mitigation requirements, on the other hand, effectively removes the possibility of development in these areas. It is considered therefore that application of the guidance as it stands would effectively limit development within large areas of East Ayrshire’s communities.
- 7.15 To illustrate in more detail the impact of current policy, an analysis has been undertaken for Kilmarnock. Details are below but before doing so it will be instructive to outline the level of employment that currently exists within flood risk areas.

## **8. ECONOMIC ACTIVITY WITHIN KILMARNOCK’S FLOOD RISK AREAS**

- 8.1 Central Kilmarnock is the economic, social and administrative centre of East Ayrshire; as a consequence, a substantial number of workplaces are located within the area.
- 8.2 Restrictions caused by the COVID-19 lockdown and recovery mean that it is not possible to ascertain by door-to-door survey precisely how many people are employed at workplaces in areas of central Kilmarnock at risk of flooding. However, official statistics provide a basis for understanding the number of people that work within those SIMD Data zones (see appendix 2) that most closely match at-risk areas. 2018 employment figures from the ONS-produced Business Register and Employment Survey (BRES) reveal the following:

Datazone	Name	Employees	Top Three Employment Types		
S01008012	Bonnyton and Town Centre - 01	5420	Health	Retail	Public admin & defence
			1000	900	800
S01007975	Kilmarnock South Central and Caprington - 03	2795	Retail	Public admin & defence	Motor trades
			1000	300	250
S01007976	Kilmarnock South Central and Caprington - 04	560	Manufacturing	Arts, entertainment, recreation & other services	Retail
			125	100	75
S01007979	Piersland - 03	505	Accommodation & food services	Health	Retail
			150	125	100

- 8.3 The figures above can only provide an indication of the number of employees within the stated SIMD areas. However what is clear is that a substantial proportion of private sector (particularly retail) and public sector jobs in Kilmarnock are located in flood risk areas.
- 8.4 Numerous businesses are located within the flood risk area of Kilmarnock town centre, including a significant proportion of Kilmarnock's retail and commercial offer. Retailers and other service providers include large national chains and multiple locally-owned independent businesses. A town centre health check undertaken by the Council in summer 2019 revealed that 67 businesses operated within ground floor units on King Street, the largest of which occupied a unit of more than 2300m<sup>2</sup>, 48 businesses operated at ground floor units on Titchfield Street and 14 within the Burns Mall. Many businesses in the area at risk of flooding offer key services, including pharmacies, opticians, greengrocers, banks and dentists.
- 8.5 Kilmarnock town centre is the beating heart of the town but its importance to the economic and social life of East Ayrshire cannot be overstated. Any adverse impact that flooding might have on the ability of businesses to remain or expand in the town centre will have a negative impact upon the economy of East Ayrshire as a whole. The East Ayrshire Local Development Plan (EALDP) 2017 prioritises the regeneration of Kilmarnock town centre and directs large-scale footfall-generating developments to it. In line with national policy it is intended that the second East Ayrshire LDP will employ a similar approach, particularly so given the ongoing trend towards online retailing, itself exacerbated by COVID-19. The impact of flood risk may, however, jeopardise any efforts to achieve lasting change in the town centre, such as the creation of employment and efforts to increase the number of people living there.
- 8.6 Kilmarnock South Central and Caprington – 03 falls almost entirely within the SEPA-delineated flooding envelope and includes low-lying areas at Queens Drive and South Central Kilmarnock. A survey undertaken in January 2020 to establish an evidence base for work on the South Central Kilmarnock masterplan revealed that 2155 people were employed within that area; a

significant majority places of work within the area are at risk of flooding. Places of work within the South Central Kilmarnock area include manufacturing businesses, workshops, a nationally-recognised computer services provider, childcare facilities and retailers.

- 8.7 Taking all of this evidence together, it is estimated that there are approximately 4,000 jobs within flood risk areas, including numerous key businesses of substantial economic importance. By any measure this is a large number and represents a significant proportion of economic activity within the Kilmarnock area.

## **9. APPLICATION OF SEPA POLICY GUIDANCE TO KILMARNOCK**

- 9.1 Flood (as opposed to a flood inundation) maps are provided on SEPA's web pages. A link to these maps is provided below. It should be noted that SEPA will update their flood maps in due course to take account of flood or local inundation events.

<http://map.sepa.org.uk/floodmap/map.htm>

- 9.2 The SEPA map for Kilmarnock shows that practically all of the area to the south of the Cross, between the Kilmarnock Water and the one way system (Sturrock Street to Armour Street) to Glencairn Square is liable to flooding, all be it at a 'low' likelihood, but that the area to the west of Titchfield Street/High Glencairn Street falls within the 'medium' likelihood to flood category. Most of the land to the south of West/East Netherton Street/Bentinck Street/Brewery Road lying between the Kilmarnock Water and the River Irvine to the A71 bypass, is also liable to flooding and is similarly classified as falling within the 'medium' likelihood to flood category but a very high proportion of the land to the east and south of the River Irvine (within the Queens Drive and Scott Ellis Playing Fields areas) falls within the 'high' likelihood categories.
- 9.3 The town centre areas to the north of the Cross (i.e. Portland Street) and west of the Kilmarnock Water (the John Finnie Street area) are not liable to flooding.
- 9.4 The table below applies the guidance to key urban areas of Kilmarnock. For clarity specific areas of Kilmarnock have been identified (please also consult the map in Appendix 2). These are:-
- Kilmarnock Town Centre (the area south of the Cross and bounded by Kilmarnock Water and Sturrock Street and the areas east of Titchfield Street and bounded by Armour Street);
  - Kilmarnock Town Centre South and South Central Kilmarnock (the areas west of Titchfield Street and High Glencairn Street and all areas south of East and West Shaw Street and lying between the River Irvine and Kilmarnock Water);
  - Queens Drive West (areas between the River Irvine and west of Queens Drive); and

- Queens Drive East (areas to the east of Queens Drive to the River Irvine).

9.5 It should be noted that the table takes account of the fact that the flood defences constructed in the Riccarton, Burnside Street/Fairyhill Road, Queens Drive and Crookedholm areas in the 1990's were constructed to the standard at that time (i.e. to a 1 in a 100 years flood period) but do not meet current SPP standards (i.e. 1 in 200 years flood period with climate allowance).

Area	Type of Development Generally Accepted	Type of Development Not Generally Accepted
Kilmarnock Town Centre	<ul style="list-style-type: none"> <li>• Residential*</li> <li>• Non-residential health facilities*</li> <li>• Shops, restaurants, etc.*</li> <li>• Offices*</li> <li>• General industrial*</li> <li>• Storage and Distribution*</li> <li>• Recreational and sports uses*</li> <li>• Amenity uses</li> </ul>	<ul style="list-style-type: none"> <li>• Civil infrastructure (e.g. hospitals, fire stations, schools, care homes etc.)</li> <li>• Most Vulnerable Uses (e.g. nurseries, residential institutions)</li> </ul>
Kilmarnock TC South South Central Kilmarnock Queens Drive West Queens Drive East	<ul style="list-style-type: none"> <li>• Recreational and sports uses*</li> <li>• Amenity uses</li> </ul>	<ul style="list-style-type: none"> <li>• Civil Infrastructure</li> <li>• Most vulnerable uses</li> <li>• Residential (all forms)</li> <li>• Non-residential health facilities</li> <li>• Shops, restaurants, etc.</li> <li>• Offices</li> <li>• General industrial</li> <li>• Storage and Distribution</li> </ul>

\* Development of these uses would be subject to a Flood Risk Assessment (FRA) so as to avoid any increase in flood risk on and off site and to ensure that a safe dry access and egress route can be established at all times of flood.

## 10. PLANNING IMPLICATIONS OF A NEW FLOOD PROTECTION SCHEME IN KILMARNOCK

10.1 It will be worthwhile, prior to examining the detailed implications of the existing flood risk guidance on each area identified in the table above, to give some context to future development planning options by offering a few general comments on the timetable for enhanced flood protection (assuming the Council's bid for grant funding is successful) and what type and scale of development can be expected on completion within the newly protected areas.

10.2 The report to Cabinet on the River Irvine Flood Model in November 2019 indicated that no new funding for flood protection schemes would be available before 2028. Therefore given that the scheme will require to be approved by the Scottish Government, that a full planning consent will have to be obtained, that a comprehensive tender process will need to be undertaken to appoint a contractor (or contractors) and that the scheme would likely be constructed in distinct phases, the best estimate for completion for a full flood protection scheme is 2035. What this effectively means is that SEPA, on the basis of the existing guidance, are unlikely to agree to *any* form of built development before 2035 within all of the medium to high risk flood areas listed above other than what has been specifically allocated in the current (2017) adopted local development plan. In other words it is highly likely that SEPA would object to the redevelopment of any vacant and derelict land (as has been experienced in recent Planning applications) before completion of any enhanced flood

protection scheme on the basis that it would reduce flood capacity and would be contrary to agreed policy. At the most greening or tree planting would be acceptable under the policy; even recreational developments may be difficult to deliver as they would still require to be provided with safe pedestrian access and egress.

- 10.3 However, it is important to appreciate that that even with a completed, enhanced flood protection scheme in place, there is no guarantee that SEPA would agree to the development of highly vulnerable uses such as dwelling houses or other forms of living accommodation that would, on the face of it, be in accord with one part of the NPF Risk Framework but would likely fall foul of meeting mitigation requirements. As noted above, SEPA may well take this view on the basis that any new development on vacant or derelict land would reduce flood capacity by definition or that exceptional flood events can occur which could breach or overtop flood walls or barriers (indeed they could cite Kilmarnock is a case in point as the 1990's flood scheme was circumvented in less than 25 years). Existing guidance does state that a "precautionary approach should be taken to proposed allocations in areas by a formal flood protection scheme."
- 10.4 It should also be noted that the detailed design of any flood protection scheme will be based on existing or previously agreed future development options; a scheme will be designed to protect 'what we know' rather than 'what may happen' or what is 'unknown' or uncertain in terms of future development. There are therefore clear limits as to what can be designed for whilst maintaining acceptable limits of certainty at the present time. In view of the above, it will be important therefore to explore alternative mitigation measures.

## **11. IMPLICATIONS OF THE FLOOD RISK GUIDANCE ON FUTURE DEVELOPMENT IN KILMARNOCK**

- 11.1 As the above table indicates the existing guidance places very significant restrictions on the type of development that will be permitted within much of Kilmarnock town centre and adjacent areas. The implications of the guidance for each area in more detail is listed below. Some commentary is also provided.

### **11.2 Kilmarnock Town Centre (including areas to the east of Titchfield Street):-**

A wide range of uses are acceptable including residential and non-residential health facilities but any new development will nevertheless be contingent on showing that the new development will not lead to an increase in the risk of flooding elsewhere. Specifically a Flood Risk Assessment will need to be prepared to inform the layout of the proposed development in a way that avoids an increase in flood risk on and off site and ensures that there is a safe dry pedestrian access and egress at times of flood. This latter requirement may be very difficult to satisfy on some centrally located sites within the town centre especially if the access/egress path to ground that is not at risk of flooding has to be elevated or use land not in the ownership of the developer.

- 11.3 Most vulnerable uses would however only be acceptable in the town centre if the flood hazard can be alleviated through appropriate mitigation and achieve as a minimum an AP of 0.1% (or a 1 in 1,000 years risk of flooding).
- 11.4 One point to note is that the total footprint of buildings within the town centre within the low risk areas will probably need to remain fixed as any increase is likely to increase flood risk not only on site but elsewhere too. This may encourage development that is physically taller or that accommodates a wider range of uses. It is also a reminder that any demolition should take place within the context of a wider, fully worked out, town centre strategy; once footprint is lost it may be lost forever. However the impact of current flood risk policy as well as the results arising (and knowledge gained) from the Irvine Valley Flood Study will need to be applied to the town centre strategy as it is refreshed. It will require to be updated taking into account flood risk, flood policy, and any mitigation that may be required.
- 11.5 However it should be noted that policy does allow for the re-use and refurbishment of existing buildings within the town centre.
- 11.6 All Other Areas (Kilmarnock Town Centre South (beyond the 1 way system and west of Titchfield Street), South Central Kilmarnock (south of Glencairn Square between River Irvine and Kilmarnock Water), Queens Drive West (Retail park/cinema area) and Queens Drive East (Car showrooms, Kilmarnock Rugby Club and the Ayrshire Athletics Arena):-

The impact of flood risk policy at the national level which now includes an additional allowance for climate change effectively means that there will be a moratorium on new development in all of the above areas. Greening and amenity projects would be permissible only until at least 2035 and even then there is uncertainty, on the basis of existing guidance (in particular mitigation requirements), as to what will be acceptable in development terms. What (paradoxically) is clear is that these areas are not acceptable for any of the Most Vulnerable Uses listed in Appendix 1.

- 11.7 The re-use of existing buildings for new uses or insertion of mezzanine floors may be acceptable.
- 11.8 Whatever happens in relation to the funding bid for flood protection it can be expected that without alternative measures, at the very least the above areas will likely stagnate or decline in the short to medium term. Similarly places of employment or businesses that wish to expand will find great difficulty in obtaining planning permission and this could impact on the ability of the town to grow economically. If businesses cannot easily expand on site or relocate locally without a strategic masterplan there is potential for jobs to be lost or to relocate out-with the area or Kilmarnock itself.

## 12. PLANNING FOR THE FUTURE OF EAST AYRSHIRE'S FLOOD RISK AREAS

- 12.1 As it stands flood risk and the policies associated with flood risk will substantially dictate the options for future planning not only in Kilmarnock but also all of East Ayrshire's communities that suffer from flood risk. Whilst flood risk is a significant concern and its impact should never be underestimated it is considered that a wider and broader range of factors do need to be carefully weighed and fully assessed before decisions are taken about the what should be included in the next Local Development Plan (LDP2). From the outset it must be said that unless a different and more balanced approach is adopted at the national as well as local level or additional funding is allocated, or alternative mitigation measures can be tested, the future prospects of many areas of East Ayrshire's communities will certainly not be as strong as they could be. However whilst the issue of flood risk is formidable it is not insuperable; but it cannot be addressed, as current policy implies, by taking a very broad brush, "one size fits all" approach. A more granular approach set within its specific strategic context is required simply because the social and economic costs for some communities is just too great. Whatever the detailed solution is it will emerge after close joint working and will require the Council and all agencies as well as the Scottish Government to work in partnership over time.
- 12.2 With respect to Kilmarnock or South Central Kilmarnock or for that matter any area within our communities at risk from flooding the key issue is whether there is any prospect that new development can be permitted if it were to be protected not only by a traditional flood protection scheme but also by a wider, strategic flood management plan.
- 12.3 If we focus in on the example of Kilmarnock given the analysis above there *may* be a way to have a much more ambitious development plan for South Central Kilmarnock (which is the area with the greatest need from a development perspective); its development and implementation will require creativity and ingenuity as well as persistence and a perspective that encompasses sites and locations well beyond South Central Kilmarnock or the town of Kilmarnock itself.
- 12.4 The risk of flooding has been examined by ARA on a river catchment scale; reducing the likelihood of flooding within South Central Kilmarnock should similarly be examined on a river catchment scale and include natural river and water management techniques. This could include an assessment of various techniques and solutions which, when taken together, may help reduce the risk of flooding. This could include peatland restoration (peatlands act a large sponges, holding incredibly large amounts of water), strategic tree planting, river and stream management techniques, soil aeration, flood resistance design and construction. However on the basis of the work Irvine Valley Flood Model it may well be that the creation of a network of new flood storage zones (constructed by taking advantage of the natural lie of the land) may prove to be the best way forward.

- 12.5 None of these suggestions detailed in paragraph 12.4 are new or untried. For example, a flood storage area was created between Hurlford and Galston to siphon off water from the River Irvine and reduce the likelihood of flooding downstream in Kilmarnock as part of the 1990's flood protection scheme. ARA has been examining how this storage area could be more effectively used but it may well be possible to develop additional storage areas to service South Central Kilmarnock further downstream, potentially within the developable area to the east of the Bellfield Interchange, and further downstream to the west of Kilmarnock. It may also be possible to create flood storage within South Central Kilmarnock as part of a wider masterplan for the area.
- 12.6 In relation to Bellfield East a stage one study has been completed by consultants on behalf of the Council. The stage one study examined the potential of the area to accept new development. Following on from the stage one study a detailed study has been recently commissioned to investigate in detail how rainwater moves and circulates through the site to clarify and inform future development options. A draft of this study has just been received however this type of analysis could be extended to other areas to help determine whether new flood storage capacity could be created or identify the best locations where other techniques could be applied.
- 12.7 It is far too early to predict how these studies and potentially additional components can come together to help reduce the likelihood of flooding within Kilmarnock or whether taken together they would give SEPA and the Council's other partners sufficient confidence to allow development within medium or higher flood risk areas of Kilmarnock. However it is hoped that solutions acceptable to SEPA and others can be found. Additionally if new development can be permitted it may well be that the cost benefit ratio used to calculate viability and affordability for flood protection schemes (see paragraph 5.2 above) may become much more favourable.
- 12.8 In July 2020 the Scottish Land Commission (SLC) published a series of reports arising from the work of the national Vacant and Derelict Land Taskforce that set out the case for changing the approach to how economic benefits arising from the productive re-use of land in urban areas are assessed. It is of interest that within their report the Council's work relating to South Central Kilmarnock (which was prepared as background information to support the next LDP) was one of the case studies identified.
- 12.9 The report recommends that a much wider range of costs and benefits than those that can be captured in economic and financial appraisals should become the norm. Their proposed framework places well-being and placemaking at the very centre of the decision making process for vacant and derelict land. As SLC indicate well-being benefits for example are those that cannot be captured in terms of jobs, GVA, taxation or financial benefits but are nevertheless important to society, communities and the environment.
- 12.10 A separate guidance document has been prepared by SLC for local authorities and any organisations with an interest in re-using vacant and derelict land.

However SLC has indicated that they may well be interested in working in partnership with the Council to see how the guidance works in practice. It is proposed therefore that discussions are opened with SLC and that the outcomes from application of the guidance is used by the Council to inform future discussions with SEPA and the Scottish Government.

- 12.11 Finally it should be noted that officers from the Planning and Economic Development Service met recently with officials from the Key Agencies Group. This group has recently been set up on a national level to help all of the key agencies, in line with the Place Principle, to develop a more collaborative approach to engagement with the planning system. The idea is for the Key Agencies (that includes SEPA, Architecture and Design Scotland, Scottish National Heritage (SNH), Heritage Environment Scotland (HES) etc.) to collaborate in the development and implementation of projects, development plans and regional spatial strategies rather than continue with existing consultation arrangements.
- 12.12 During the first meeting the issue of flood risk was discussed in the context of the next LDP for East Ayrshire, the Ayrshire Growth Deal, the indicative Regional Spatial Strategy and the forthcoming National Planning Framework (NPF4 which will incorporate an updated Scottish Planning Policy). Whilst these discussions are only just beginning and how they develop remains to be seen they are, nevertheless, very much to be welcomed. At the very least it will help the key agencies understand better all of the issues within East Ayrshire arising from flood risk (especially those related to the local economy and regeneration) and will also give Council officers the opportunity to learn from good practice at home or even abroad. It is therefore recommended that as the discussions continue officers from a range of Council services are invited to attend including ARA and the Council's housing service. It is hoped (as suggested above) that through these discussions a more nuanced and strategic approach to planning for and tackling flood risk will develop which will enable the Council through its LDP and other documents to actively manage flood risk and provide a platform for community and town centre regeneration and economic growth.

### **13. NEXT STEPS**

- 13.1 It is clear that the issue of flooding is a very serious one for Kilmarnock, as it is for other communities in East Ayrshire. The way forward will be challenging and will require the Council to take stock as we progress in dealing with the issue. However the next steps are likely to involve the following:-
1. Notwithstanding the positive development in relation to the Key Agencies Group on the basis of the analysis contained in this report and the implications of current policy on many communities in East Ayrshire it is considered that there would be merit in opening discussions at a Chief Executive level between the Council and SEPA and the Scottish Government;
  2. Continue discussions with the Key Agency Group;

3. Find out how other Councils at home and abroad (e.g. Holland) are tackling this challenging issue so that we can learn from best practice;
4. Undertake a detailed analysis (similar to that completed for Kilmarnock) of the impact of flood risk policy on all relevant communities in East Ayrshire;
5. Review the Kilmarnock Town Centre Strategy to take account of flood risk; ensure that the implications of any demolition of buildings within the town centre are considered;
6. Continue the LDP2 work on a strategy for South Central Kilmarnock working in partnership with SLC; integrate the strategy with that for Kilmarnock Town Centre;
7. Prepare a costed master-plan including a comprehensive Traffic Impact Analysis for the Bellfield East Economic Growth Area identified in the EA LDP taking account of the requirements of the Ayrshire Growth Deal and any wider strategic flood mitigation strategy work; and
8. Establish a Flood Management Working Group to support the actions detailed in 1-7 above.

#### **14. PERSONNEL IMPLICATIONS**

- 14.1 There are no direct personnel implications arising from this report.

#### **15. FINANCIAL IMPLICATIONS**

- 15.1 It is too early to assess the financial implications for the Council at the present time. As further work is completed these costs will become more apparent. However it should be noted that there will be significant costs to the Council in developing strategic flood mitigation whatever route is taken to deal with flood risk.

#### **16. LEGAL/POLICY IMPLICATIONS**

- 16.1 There are no legal implications directly arising from this report at the present time. It is probable that there may well be a number of legal implications as further work is completed on this topic but it is too early to provide an accurate indication of what they will be.
- 16.2 As indicated flooding will be a key issue for the next Local Development Plan for East Ayrshire. Outcomes from the work detailed and recommended above will influence the content of the plan but again it is too early to indicate with any degree of accuracy what these will be.

## **17. COMMUNITY PLAN IMPLICATIONS**

- 17.1 Flooding has had and will likely continue to have serious implications for various communities in East Ayrshire and on the opportunities for economic development. Finding solutions to or improving the likelihood of flooding will ultimately bring significant benefits to these communities.

## **18. RISK MANAGEMENT IMPLICATIONS**

- 18.1 Reducing the likelihood of flooding and delivering flood mitigation solutions will have a positive impact on the Council's risk profile.

## **19. EQUALITY IMPACT IMPLICATIONS**

- 19.1 To date equality implications have yet to be examined but will be as further work is undertaken. A draft EQIA will be completed and will inform the contents of strategies as they are prepared; a full EQIA will be completed at the finalised draft stage of any strategy.

## **20. TRANSFORMATION IMPLICATIONS**

- 20.1 There are no direct transformation implications arising from this report for the Council's transformation strategy.

## **APPENDICES**

Appendix 1: SEPA Flood Risk and Land Use Vulnerability Guidance

Appendix 2: SEPA Flood Risk Map for Kilmarnock Town Centre (with data-zones)

**Background Papers:** Report to Cabinet of 6<sup>th</sup> November 2019 entitled, Irvine Valley Flood Study Report.

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**(KD/DMcD)**  
**3 September 2020**

# Appendix 1

## SEPA Flood Risk and Land Use Vulnerability Guidance

**Table 1: SEPA Land Use Vulnerability Classification<sup>1</sup>**

1. Most Vulnerable Uses	2. Highly Vulnerable Uses	3. Least Vulnerable Uses	4. Essential Infrastructure	5. Water Compatible Uses <sup>3</sup>
<p>For the purpose of this guidance, <b>Most Vulnerable Uses</b> include land uses that are defined as both <b>civil infrastructure</b> and <b>most vulnerable</b> in the SPP 2014 glossary. Civil infrastructure is denoted with an asterisk (*) in the list below.</p> <p>Most Vulnerable Uses therefore comprise:</p> <ul style="list-style-type: none"> <li>• police stations*</li> <li>• ambulance stations*</li> <li>• fire stations*</li> <li>• command centers and telecommunications installations required to be operational during flooding*</li> <li>• emergency dispersal points*</li> <li>• hospitals*</li> <li>• schools*</li> <li>• care homes*</li> <li>• nurseries</li> <li>• residential institutions, e.g. prisons, children's homes</li> <li>• basement dwellings</li> <li>• isolated dwelling(s) in sparsely populated areas</li> <li>• dwelling houses situated behind informal embankments<sup>2</sup></li> <li>• caravans, mobile homes, chalets and park homes intended for permanent residential use</li> <li>• holiday caravan, chalet, and camping sites</li> <li>• installations requiring hazardous substance consent (but where there is demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or with energy infrastructure, that require a coastal or water-side location, or other high flood risk areas, then the facilities should be classified as <b>Essential Infrastructure</b> – see column 4).</li> </ul>	<p>Comprise:</p> <ul style="list-style-type: none"> <li>• buildings used for dwelling houses</li> <li>• social services homes (ambulant /adult)</li> <li>• hostels and hotels</li> <li>• student halls of residence</li> <li>• non-residential uses for health service</li> <li>• landfill and sites used for waste management facilities for hazardous waste</li> </ul>	<p>Comprise:</p> <ul style="list-style-type: none"> <li>• shops</li> <li>• financial, professional, and other services</li> <li>• restaurants and cafés</li> <li>• hot-food takeaways</li> <li>• drinking establishments</li> <li>• nightclubs</li> <li>• offices</li> <li>• general industry</li> <li>• storage and distribution</li> <li>• non-residential institutions not included in Most Vulnerable or Highly Vulnerable Uses</li> <li>• assembly and leisure</li> <li>• land and buildings used for agriculture and forestry that are subject to planning control</li> <li>• waste treatment (except landfill and hazardous waste facilities)</li> <li>• minerals working and processing (except for sand and gravel)</li> </ul>	<p>Comprises:</p> <ul style="list-style-type: none"> <li>• essential transport infrastructure (including mass evacuation routes) that has to cross the area at risk</li> <li>• essential utility infrastructure that has to be located in a flood risk area for operational reasons (this includes electricity generating power stations and grid and primary sub-stations, sewage treatment plants and water treatment works, wind turbines and other energy generating technologies)</li> <li>• installations requiring hazardous substance consent <b>only</b> where there is demonstrable need to locate such installations for the bulk storage of materials with port or other similar facilities, or with energy infrastructure that requires a coastal, water-side, or other high flood risk area location.</li> </ul>	<p>Comprise:</p> <ul style="list-style-type: none"> <li>• flood control infrastructure</li> <li>• environmental monitoring stations</li> <li>• water transmission infrastructure and pumping stations</li> <li>• sewage transmission infrastructure and pumping stations</li> <li>• sand and gravel workings</li> <li>• docks, marinas and wharves</li> <li>• navigation facilities</li> <li>• MOD defence installations</li> <li>• ship building, repairing, and dismantling</li> <li>• dockside fish processing and refrigeration and compatible activities requiring a waterside location</li> <li>• water-based recreation (excluding sleeping accommodation)</li> <li>• lifeguard and coastguard stations</li> <li>• amenity open space</li> <li>• nature conservation and biodiversity</li> <li>• outdoor sports and recreation and essential facilities such as changing rooms</li> <li>• essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific operational warning<sup>4</sup> and evacuation plan.</li> </ul>

<sup>1</sup> Developments that combine a mixture of uses should be placed in the higher of the relevant classes of flood risk vulnerability. The impact of a flood on the particular land use could vary within each vulnerability class. In particular, a change of use to a dwelling house within the 'Highly Vulnerable' category could significantly increase the overall flood risk, especially in relation to human health and financial impacts. Any proposal for a change of use to a dwelling house should therefore be supported by a flood risk assessment. The redevelopment (including change of use) of an existing building or site provides a valuable opportunity to reduce the vulnerability of that site to flooding and therefore to reduce overall flood risk. This can be achieved through changes to less vulnerable land uses and improvements to the management of flood risk on the site.

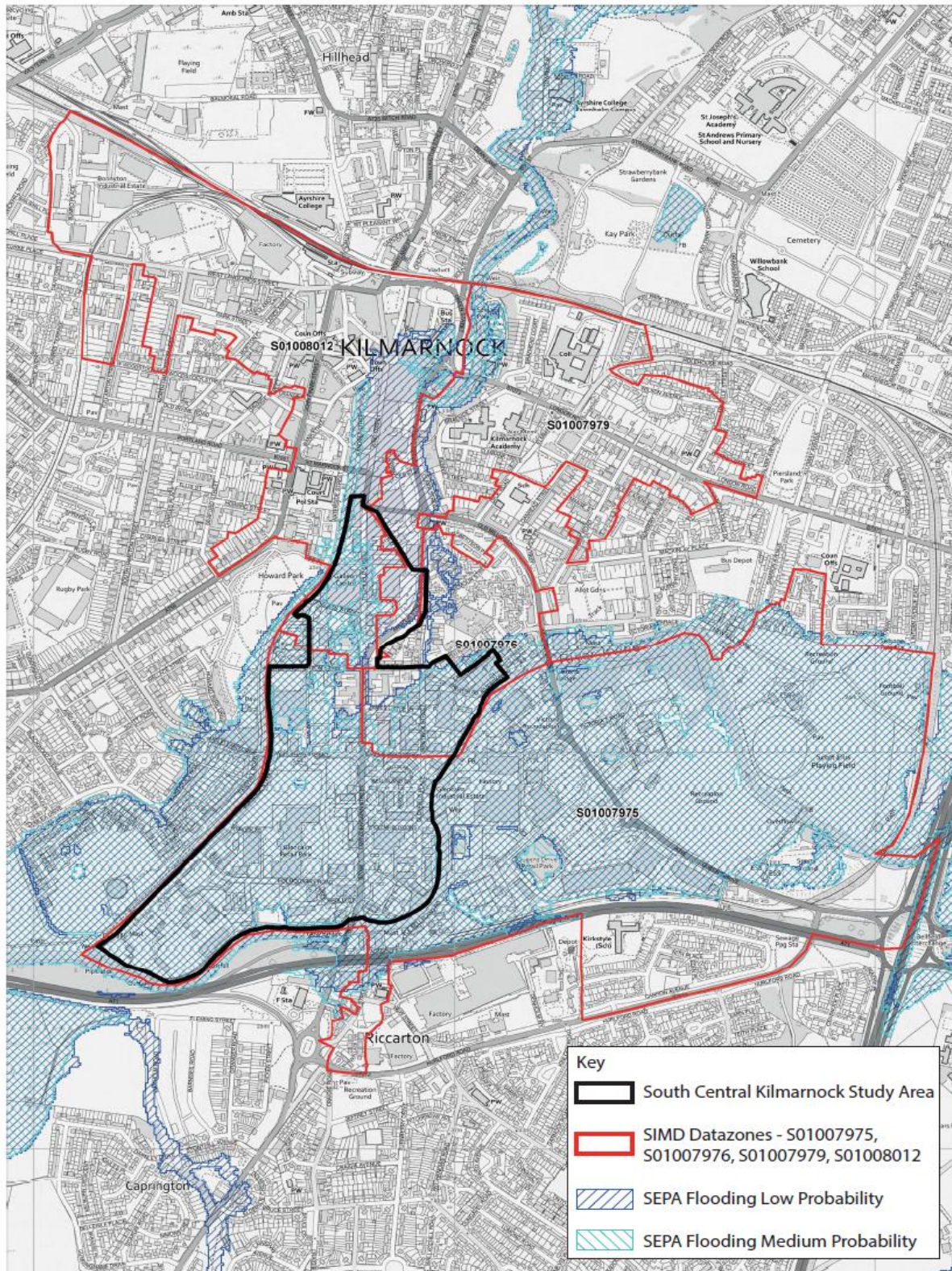
<sup>2</sup> Embankments not formally constituted under flood prevention legislation including agricultural flood embankments constructed under permitted development rights.

<sup>3</sup> Advice in the SPP risk framework on these activities is limited. The nature of the above activities necessitates locations that are prone to flooding. Generally, it is difficult to recommend a specific annual return period to guide development decisions for such uses. SEPA would recommend that the risk of flooding should be assessed giving particular consideration to:

1. Specific locational requirements of the development and availability of alternative locations;
2. Consideration of any loss of floodplain storage (in riverside developments) that may increase flood risk to nearby existing development and options to mitigate against this;
3. Appropriate mitigation measures, including water resistance and resilience measures;
4. Health and safety implications and the need for access, egress, and evacuation, with specific consideration of, and provision of, measures to provide for these where:
  - The development will attract the public especially vulnerable people such as children and old people.
  - Large numbers of the public may gather and where evacuation routes are limited.
  - Hazardous materials are stored or processed.

<sup>4</sup> In this context, specific warning does not mean a formal flood warning from SEPA. SEPA does not support the provision of flood warning as a viable reason to develop in flood risk areas. Warning is a non-structural measure that does not physically prevent flooding and has associated uncertainties.

## Appendix 2 SEPA Flood Risk Map for Kilmarnock Town Centre (with data zones)



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