

The logo features a large, stylized letter 'I' that serves as a background for the text. The 'I' is composed of two overlapping circular shapes, one in a lighter teal and one in a darker teal. The text 'Inverclyde' is written in a white serif font, and 'council' is in a smaller, white sans-serif font below it.

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**LOCAL
DEVELOPMENT
PLAN**

PROPOSED PLAN
MAY 2021

PROPOSED DEVELOPMENT SITE ASSESSMENT

Introduction

This document assesses the suitability of development sites proposed for inclusion in the Local Development Plan through the 2020 Call for Sites process and internal Council consultation (Sept – Oct 2020). An initial assessment was published for consultation alongside the Main Issues Report (December 2020). Sites promoted through the Main Issues Report consultation are included in this updated assessment.

The proposed development sites are listed in Table 1

Table 1 Proposed Development Sites

Ref	Site	Town/village	Page
CFS01	Carsemeadow	Quarrier's Village	14
CFS02	Kaimes Grove	Quarrier's Village	21
CFS03	North Denniston	Kilmacolm	26
CFS04	Knapps 1	Kilmacolm	33
CFS05	Knapps 2	Kilmacolm	40
CFS06	Police Station Field	Kilmacolm	47
CFS07	Lochwinnoch Road	Kilmacolm	55
CFS08	Land at Overton, West Glen Road	Kilmacolm	62
CFS09	Smithy Brae	Kilmacolm	68
CFS10	Port Glasgow Road (1)	Kilmacolm	75
CFS11	Port Glasgow Road (2)	Kilmacolm	81
CFS12	Knockbuckle Road	Kilmacolm	86
CFS13	Quarry Drive	Kilmacolm	91
CFS14	Migdale	Kilmacolm	99
CFS15	Planetreetyetts	Kilmacolm	104
CFS16	Stables Wood	Kilmacolm	112
CFS17	Arran Avenue	Port Glasgow	*
CFS18- CFS 21	Port Glasgow Industrial Estate	Port Glasgow	118
CFS22	Barrs Brae (south)	Port Glasgow	125
CFS23	Barrs Brae (north)	Port Glasgow	130
CFS24	Bay Street	Port Glasgow	136
CFS25	Gibshill Road	Greenock	141
CFS26	Ratho Street/MacDougall Street	Greenock	147
CFS27	Whinhill	Greenock	153
CFS28	Puggy Line (housing and other uses)	Greenock	159

CFS29	Norfolk Road	Greenock	164
CFS30	Carnoustie Avenue (1)	Gourock	169
CFS31	Carnoustie Avenue (2)	Gourock	175
CFS32	Spango Valley (former IBM site)	Greenock	181
CFS33	Spango Valley (Sanmina site)	Greenock	188
CFS34	Harbourside, Kip Marina	Inverkip	196
CFS35	Former Inverkip Power Station	Inverkip	*
CFS36	Kelly Mains Farm	Wemyss Bay	202
CFS37	Union Street	Greenock	*
CFS38	Ocean Terminal	Greenock	**
CFS39	The Harbours	Greenock	*
CFS40	James Watt Dock	Greenock	*
CFS41	Inchgreen	Greenock	*
CFS42	Kingston Dock	Port Glasgow	208
CFS43	Finnart Street	Greenock	215
CFS44	Custom House Way	Greenock	220
CFS45	Misty Law	Kilmacolm	226
MIR1	Upper Cartsburn Street	Greenock	231
OS1	McPherson Drive	Gourock	237
OS2	Stafford Street	Greenock	***
OS3	McLeod Street	Greenock	***
OS4	Mearns Street	Greenock	242
OS5	Brachelston Street	Greenock	247
OS6	Glenbrae Road	Greenock	***
OS7	Craigbet Road	Quarrier's Village	***
OS8	Eldon Street	Greenock	***
OS9	KGV Playing Fields	Greenock	****

* Some sites submitted through the Call for Sites process were already included in previous Local Development Plans. Where the same site has been submitted for the same use/scale of development, it was considered in the Main Issues Report Development Opportunity Review instead of in this document.

** The promoted use is already established within the existing Local Development Plan.

*** These sites have not been assessed as they have a current planning permission.

**** Site withdrawn.

Each site assessment is structured as follows:

- Details of development proposal (as submitted to the Council)
- Site map
- Planning History
- Sustainability Assessment
- Deliverability Assessment
- Key Agency comments
- Summary of other comments submitted to MIR consultation
- Conclusion

Assessment Methodology

To ensure that each site was assessed in a consistent manner, a pro-forma approach was used. To aid clarity and provide transparency, the following section sets out and explains the criteria which was applied in the sustainability and deliverability assessments.

Sustainability Assessment

A sustainability assessment was undertaken to align with Scottish Planning Policy (2019), specifically the Principal Policy on Sustainability which requires that planning policies and decisions should support sustainable development. To enable assessment of whether a policy or proposal supports sustainable development, Scottish Planning Policy identifies 13 principles that should be taken into account, listed below.

1. giving due weight to net economic benefit;
2. responding to economic issues, challenges and opportunities, as outlined in local economic strategies;
3. supporting good design and the six qualities of successful places;
4. making efficient use of existing capacities of land, buildings and infrastructure, including supporting town centre and regeneration priorities;
5. supporting delivery of accessible housing, business, retailing and leisure development;
6. supporting delivery of infrastructure, for example transport, education, energy, digital and water;
7. supporting climate change mitigation and adaptation, including taking account of flood risk;
8. improving health and well-being by offering opportunities for social interaction and physical activity, including sport and recreation;
9. having regard to the principles for sustainable land use set out in the Land Use Strategy;
10. protecting, enhancing and promoting access to cultural heritage, including the historic environment;
11. protecting, enhancing and promoting access to natural heritage, including green infrastructure, landscape and the wider environment;

12. reducing waste, facilitating its management and promoting resource recovery; and
13. avoiding over-development, protecting the amenity of new and existing development and considering the implications of development for water, air and soil quality.

While these principles provide a robust framework on which to base the sustainability assessment, in practice not all of the principles could be applied to the site assessments. Table 2 sets out those principles, or elements of them, which were not applied and the reasons for this.

Table 2

SPP Sustainability Principles		Reasons principle not applicable to Site Assessment
2	Responding to economic issues, challenges and opportunities, as outlined in local economic strategies	The Council does not currently have an Economic Strategy against which to assess whether proposed development sites would respond to identified economic issues, challenges and opportunities.
3	Supporting good design and the six qualities of successful places	<p>The design related elements of this principle do not apply because the assessment relates to the suitability of a 'site', not development design.</p> <p>With regard to the six qualities of successful places, specifically the 'Factors Contributing to Successful Places' set out in Figure 2 of the current LDP, relevant factors are:</p> <p><u>Distinctive</u></p> <ol style="list-style-type: none"> 1. Retain locally distinct built and natural features? 2. Contribute positively to historic buildings and places? <p><u>Resource Efficiency</u></p> <ol style="list-style-type: none"> 3. Make use of existing buildings and previously developed land 4. Take advantage of natural shelter and sunlight <p><u>Easy to Move Around</u></p> <ol style="list-style-type: none"> 5. Be well connected with good path links to the wider path network and public transport nodes and neighbouring developments <p><u>Safe and Pleasant</u></p> <ol style="list-style-type: none"> 6. Avoid conflict between adjacent uses by having regard to adverse impacts that may be created by noise; smell, vibration, dust, air quality, flooding; invasion of privacy or overshadowing. <p><u>Welcoming</u></p> <ol style="list-style-type: none"> 7. Integrate new development into existing communities

		It is considered that factors 1-3 and 5-6 are covered under other sustainability principles and do not require to be assessed again. Factor 7 will be assessed under this principle. It is considered that Factor 4 cannot be assessed at this stage.
8	Having regard to the principles for sustainable land use set out in the Land Use Strategy;	It is considered that the relevant principles from the Land Use Strategy are covered under other parts of this assessment.
11	Reducing waste, facilitating its management and promoting resource recovery;	It is considered that this principle is more appropriately applied at the planning application stage.
12	Avoiding over-development, protecting the amenity of new and existing development and considering the implications of development for water, air and soil quality	The 'avoiding over-development' element of this principle is not applicable because it would require an assessment of the layout and design of individual developments, which is not the focus of the site assessments. The remaining elements will form part of the site assessment.

To enable the proposed development sites to be assessed against the remaining sustainability principles, it was necessary to apply detailed criteria to each principle. In many cases, the criteria used were taken from the Strategic Environmental Assessment of the Local Development Plan Proposed Plan (i.e. Proposed Plan: Environmental Report) which is published alongside the Proposed Plan for consultation.

Table 3 sets out the assessment criteria for each sustainability principle, the key information sources used and, where appropriate, the assumptions underpinning the assessment.

Table 3

SPP Sustainability Principles		Assessment criteria	Considered in SEA?	Information sources used	Assumptions underpinning assessment
1	Giving due weight to net economic benefit	Will the proposal likely result in a net economic benefit?	No	n/a	All residential or employment generating proposals are likely to contribute to net economic benefit, during the construction and/or operational phases (e.g. once houses are lived in), unless it can be demonstrated that a proposal would result in economic displacement that would outweigh any benefit.

3	Supporting the six qualities of successful places, specifically: <ul style="list-style-type: none"> • Integrate new development into existing communities 	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	No	n/a	n/a
4	Making efficient use of existing capacities of land, buildings, and infrastructure, including supporting town centre or Priority Places regeneration priorities.	Will the proposal bring brownfield land, vacant or derelict land back into use?	Yes	n/a	n/a
		Will the proposal support any town centre or priority place priorities?	No	Local Development Plan: Supplementary Guidance on Priority Places Council approved Town Centre Regeneration Plans	A proposal will be considered to support the principle when the proposed site is, either individually or as part of a wider area, identified in a Council approved Town Centre or Priority Place regeneration area.
		Has a need for additional infrastructure been identified? (e.g. transport and education etc.)	No	Consultation responses from the Council's Roads and Education services and relevant external infrastructure providers	n/a
5	Supporting delivery of accessible housing, business, retailing and leisure development.	Is the proposed within 400m of a bus stop with at least 6 buses per hour between 7am and 7pm on weekdays?	Yes	Consultation response from SPT	n/a
		Is the proposed within 400m of a bus stop with at least 1 bus per hour between 7am and 7pm on weekdays?	Yes	Consultation response from SPT	n/a
		Is the proposed site within 400m of a bus stop?	Yes	Consultation response from SPT	n/a
		Is the proposed site within 800m of a rail station?	Yes	Consultation response from SPT	n/a
		Is the proposed site within 800m of a town or local centre?	Yes	Integrated Transport Network (ITN) system	n/a

6	Supporting delivery of infrastructure, for example transport, education, energy, digital and water	Is the main purpose of the proposal to provide new infrastructure?	No	n/a	n/a
7	Supporting climate change mitigation and adaptation	Is the site currently thought to be at risk of flooding (either through identification on the appropriate SEPA flood map or by local knowledge) or could its development change the risk of flooding elsewhere?	Yes	Consultation responses from SEPA and Inverclyde Roads Service	Flood Risk Framework set out in Scottish Planning Policy (2019)
		Is the site at risk of flooding under current climate change predictions?	Yes	Consultation responses from SEPA and Inverclyde Roads Service	Flood Risk Framework set out in Scottish Planning Policy (2019)
8	Improving health and well-being by offering opportunities for social interaction and physical activity, including sport and recreation.	To what extent would the proposal affect the quality and quantity of open space and connectivity to open space	Yes	Open space provision safeguarded in Local Development Plan (2019)	It is assumed that existing open space provision or connections between spaces, could be affected when an area of open space or a section of the network connecting them is located within a proposed site boundary.
		To what extent will the proposal affect core path links or other key access networks such as cycle paths and coastal paths?	Yes	Core paths network - Inverclyde Council National Cycle Route 75 and 753 (Sustrans)	It is assumed that the active travel network could be affected when a section of the network is located within or immediately adjacent to the proposed site boundary. The extent of any effect is assessed on a site by site basis. Where possible, opportunities to incorporate a path into a future development or for alternative path provision will be considered.
10	Protecting, enhancing and promoting access to cultural heritage, including the historic environment.	To what extent will the proposal effect any designated cultural heritage assets?	Yes	Consultation response from Historic Environment Scotland Historic Environment Scotland 'Listing, Scheduling and Designations'	It is assumed that a designated asset or its setting could be affected when the asset is located within or in close proximity to the proposed development site, unless an appropriate survey submitted by the site promoter indicates otherwise.

				Advice and Support Historic Environment Scotland History	
		Will the proposal effect any non-designated but locally important cultural heritage asset and/or their setting?	Yes	Archaeology / Scheduled Monuments - Inverclyde Council	Non-designated sites include archaeological sites of regional or local importance and unlisted buildings/structures on the Buildings at Risk Register.
		To what extent will the proposal result in the opportunity to enhance or improve access to the historic environment?	Yes	Consultation response from Historic Environment Scotland Historic Environment Scotland 'Listing, Scheduling and Designations' Advice and Support Historic Environment Scotland History	A proposal will be considered to improve access to the historic environment when it involves physical improvements to a designated or valued non-designated historic environmental asset.
11	Protecting, enhancing and promoting access to natural heritage, including green infrastructure, landscape and the wider environment.	To what extent will the proposal affect European, National or Local environmental designations?	Yes	Consultation response from NatureScot Natural Heritage Designations - Inverclyde Council	It is assumed that a designated asset could be affected when it is located within or adjacent to the proposed development site, unless an appropriate ecological survey submitted by the site promoter indicates otherwise.
		To what extent will the proposal affect non-designated features, e.g. trees, TPO's, hedges, woodland and species rich grasslands?	Yes	Consultation responses from NatureScot and Scottish Forestry. Tree Preservation Orders & Trees in Conservation Areas - Inverclyde Council	It is assumed that a proposal could adversely affect non-designated features when they are located within or adjacent to the site boundary, unless the proposal specifically states that these features will be retained as part of the development.

				Scottish Forestry - Native Woodland Survey of Scotland Habitat Map of Scotland Scotland's environment web	
		To what extent will the proposal affect Protected Species, e.g. bats, otters etc.?	Yes	Consultation responses from NatureScot and Scottish Forestry.	It is assumed that a proposal on a greenfield site could, potentially, adversely affect protected species, unless an appropriate survey (carried out within the last 18 months) confirms that there would be minimal impact.
		How will habitat connectivity or wildlife corridors be affected by the proposal - will it result in habitat fragmentation or greater connectivity?	Yes	Consultation response from NatureScot.	n/a
		Will the proposal have the opportunity to enhance the green/blue network e.g. on-site improvements	Yes	n/a	It is assumed that all proposed development site would, to varying degrees, contribute to green infrastructure provision as this is a policy requirement in the current LDP (2019), which is expected to be carried forward into the next plan.
		Are there any local geodiversity interests that could be affected by the proposal?	Yes	Geological Conservation Review sites NatureScot	It is assumed that a local geodiversity interest could be affected if all or part of a Geological Conservation Review' site is within the proposed development site boundary.
		Would the proposal exceed the capacity of the landscape to accommodate it?		Consultation response from NatureScot. Landscape Character Assessment NatureScot	Assessment takes account of impacts on settlement boundaries, existing townscape, landscape character and setting.

		To what extent will the proposal affect features of landscape interest?	Yes	Consultation response from NatureScot.	Features include watercourses, landforms or significant slopes/changes in level and woodland
13	Protecting the amenity of new and existing development and considering the implications of development for water, air and soil quality	Will the option lead to a sensitive use being located close to an existing or proposed site regulated for emissions to air by SEPA or a potential nuisance (i.e. noise, dust, and odour)?	Yes	Consultation response from SEPA	Residential and community facilities are considered to be sensitive uses.
		Does the option introduce a new potentially significant air emission to the area	Yes	n/a	Significant air emissions include combined heat and power, an industrial process, large scale quarry or energy from waste plant.
		Could the option have a direct impact on the water environment?	Yes	Consultation response from SEPA	Assessment considers the following issues: <ul style="list-style-type: none"> • will there be a need for new watercourse crossings or a large scale abstraction? • Could the option enable the de-culverting of a watercourse or a change in status of a water body identified in the Scotland and Solway Tweed River Basin Management Plans?
		Does the option affect wetlands and boggy areas on the site?	Yes	Consultation response from SEPA	n/a
		Can the option connect to the public foul sewer and is there capacity for connection?	Yes	Consultation responses from SEPA and Scottish Water	n/a
		Are there any private or public water supplies within 250m of the site which may be affected	Yes	Consultation response from SEPA	n/a
		Could the option lead to Local Air Quality Management thresholds being breached in an existing Air Quality	Yes	Consultation response from Inverclyde	n/a

		Management Area or lead to the designation of a new Air Quality Management Area (AQMA)?		Council Environmental Health Team	
		Are there any contaminated soils issues on the site and if so, will the option reduce contamination?	Yes	Inverclyde Council Contaminated Land officer	In line with Policy 16 of the current LDP, the redevelopment of a contaminated site will result in its decontamination.
		Is the proposal on carbon rich soils or peatland (as defined by SNH soil maps or local knowledge) and could the development of the site lead to a loss of peat?	Yes	Carbon and peatland 2016 map Scotland's soils (environment.gov.scot)	It is considered that development of Classes 1- 2 which contain carbon rich and deep peat soils, would have significant adverse effects on this resource.
		Does the proposal result in the loss of the best quality agricultural land?	Yes	Land Capability for Agriculture Classification (LCA) map	Class 3.1 land and above is considered the best quality agricultural land.

The result of the sustainability assessment will be summarised in the format set out in Table 4. The first part is based on the Strategic Environmental Assessment, which is divided up into nine topics. To aid clarity, the link between each topic and the relevant SPP Sustainability Principle is identified. The second part includes those criteria which are not assessed as part of the Strategic Environmental Assessment.

Table 4 Sustainability Assessment template

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	
Biodiversity	11	
Climatic Factors	7, 5	
Air	13	
Soil	13,4	
Landscape	11	
Material Assets	4	

Cultural Heritage	10	
Population and Health	5, 8, 13	

SPP Sustainability Principle	Criteria	Comment
1	Will the proposal likely result in a net economic benefit?	
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	

Deliverability Assessment

National planning policy has placed a greater focus on deliverability in recent years, particularly in relation to sites identified in Local Development Plans. While there is not yet an agreed standard pro-forma, Inverclyde Council considers that for development sites to be deliverable, they need to be supported by sufficient infrastructure and based on evidence of developer interest and market demand.

Tables 5 and 6 set out the criteria considered in the deliverability assessment and the key information sources on which assessments are based.

Table 5 Infrastructure

Criteria	Information source
Would the proposed site require additional transport infrastructure provision?	Transport Scotland Inverclyde Council Roads service
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)?	Scottish Water
Does the proposal raise any educational capacity issues?	Inverclyde Council Education service

Table 6 Marketability

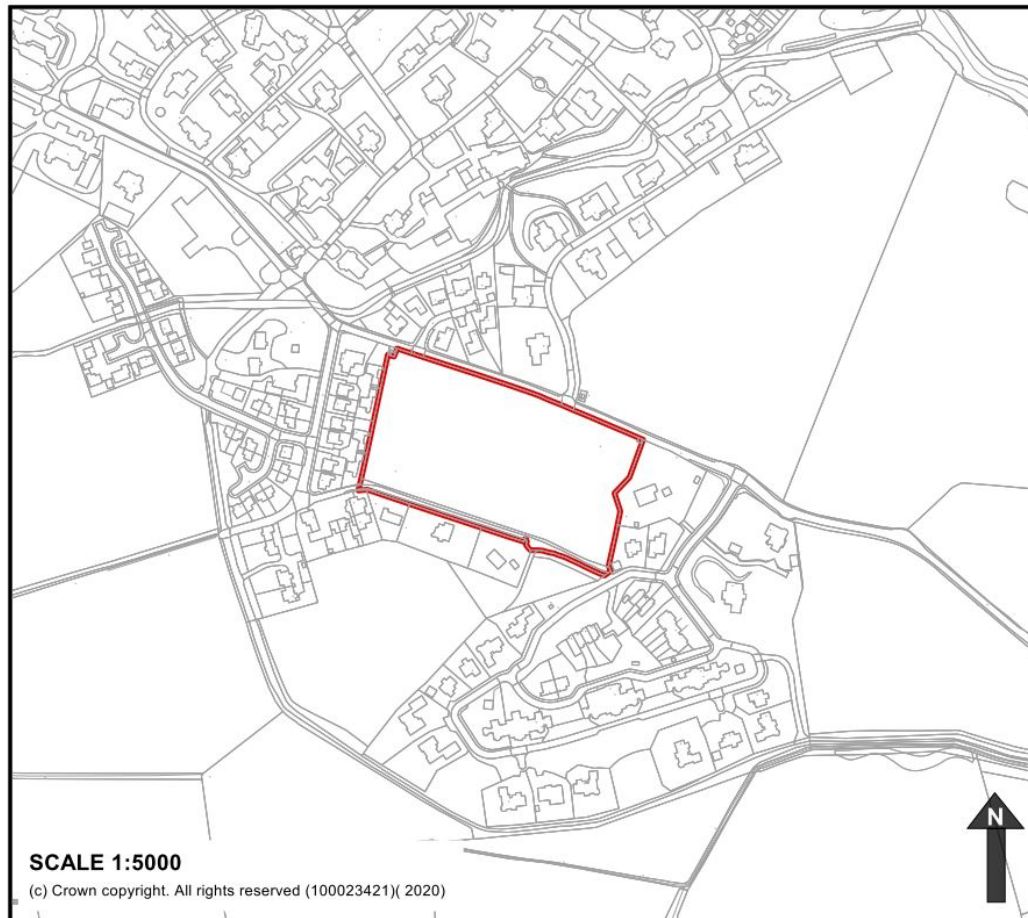
Criteria	Information source
Does a proven housebuilder have an interest in the site?	Call for Sites submission
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland information

If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	Planning officer assessment
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Site Assessments

Site Details

Site name	Carsemeadow
Settlement	Quarrier's Village
Call for Sites reference	CFS01
Site size (ha)	2.3
Current use	Agriculture
Existing LDP designation	Green Belt



Proposal

Submitted by	Gladman Developments Ltd and Quarriers
Proposed Use	Residential
Number of houses/floorspace	50 units (Call for Sites submission)
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response.	<p>To reflect a scale of development more appropriate to the village, the proposed site area is significantly reduced from that previously submitted for inclusion in LDP2. In the appeal of planning application 18/0190IC, the Reporter found (1) site is effective and capable of delivering housing to meet the housing shortfall (2) the site would not, in principle, undermine the landscape setting of the village (3) mitigation of any effects of development can be achieved through careful selection of developable area within the larger site and through detailed design and layout, (3) there are no listed buildings within the setting of the site that are likely to be affected by development (4) development of the site has been assessed as capable of preserving the character and appearance of the Conservation Area.</p> <p>The submission of market interest demonstrates that a range of developers and housebuilders are keen to develop the site. All necessary utilities and infrastructure are available and deliverable to the site.</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> • Inverclyde Council Call for Sites Assessment 2017 • Confirmation of market interest • Application (180190IC) consultation response - landscape • Appeal decision PPA-280-2027 • Key documents from planning application 180190IC - LVIA, FRA, TA, Design & Access Statement and Economic Impact Assessment plus other environmental and technical documents are available to the Council via their planning portal. • MIR representation <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p><i>Soil/Material Assets</i> - Site is largely enclosed by development and therefore considered an infill site within the village, rather than contributing to wider greenbelt objectives.</p> <p><i>Landscape</i> - In appeal PPA-280-2027, the Reporter concluded “I do not find that the proposed development would, in principle, undermine the landscape setting of the village.” In relation to application 18/0190/IC, the Council’s landscape consultation response (paragraph 8.1) states that; “While acknowledging the site lies within the designated green belt we suggest it also lies within the village envelope. Housing on three sides of the site and the road with existing street lighting along its northern boundary characterise the space as a gap site within the village.”</p> <p><i>Cultural Heritage</i> - The Reporter in the appeal PPA-280-2027 concluded there would no impact on listed buildings and that development of the site is capable of preserving the character and appearance of the Conservation Area.</p>

	<p><i>Climatic Factors</i> - Local bus service from Torr Road is well within the 400m walking distance and also provides a direct link to Johnstone railway station. Allocation of the site would increase potential bus users and help facilitate additional bus provision.</p> <p><i>Population and Health</i> - A full range of services are available in Kilmacolm and Bridge of Weir, which are accessible by a range of modes of transport.</p>
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Planning History

Planning Applications	<p>18/0190/IC - Planning permission in principle for residential development etc. Refused 4/3/2019.</p> <p>PPA-280-2027 - Initial appeal dismissed (29/7/2019), but subsequently quashed at Court of Session.</p> <p>PPA-280-2027-1 -.Appeal currently being re-determined</p>
Previous Plan - Reporters Comments	<p>The site now being proposed for inclusion in the plan is the northern part of the larger site which was originally suggested to the council and assessed by it. I consider that the site has certain characteristics which would make it suitable for development. Although currently in agricultural use, it makes a limited contribution to the key objectives of the green belt. Development here would consolidate the main part of the village with the adjacent residential area around Laurel Way, which is surprisingly not shown as a residential area on the proposals map. In these circumstances, I do not consider that it would represent a significant intrusion into the open countryside. The council's assessment of the site's natural heritage value indicates that this principally relates to its boundary trees and vegetation, which could be taken into account in the detailed design in order to avoid development having a substantially negative impact. However, the site also occupies an elevated position which makes it prominent, and successful integration with the existing village would depend heavily on the development's layout, landscaping and quality of design. Detailed technical and environmental investigations have also been undertaken by those proposing the site's allocation. There appear to be no significant constraints which would prevent its development, although additional pressure would be placed on the village's sub-standard road network, and the findings of a flood risk assessment would need to inform the development. Although it is not at present under the control of a house-builder, I am satisfied that this is a site which would be capable of becoming effective and delivering house completions during the plan period. However the village offers minimal facilities (a café, a florist and a playing field) and is relatively isolated, particularly for those dependent on public transport due to its limited bus services. While its development could secure a proportion of affordable or social needs houses, I consider that its relative isolation makes this a generally inappropriate location for them. I find that Quarrier's Village is a less sustainable location compared to Kilmacolm, or to the main settlements either of Inverclyde or of the Renfrewshire housing sub-market area. These are key considerations which are also reflected in the many representations made by local people. I have also found that this site's development for housing would not afford other significant benefits which might justify allocating it in the absence of a confirmed requirement for additional housing land.</p>

Green Belt boundary issues

Robustness of existing boundary	Formed by a road to the north, a lane to the south, and garden boundary fences to the east and west.
Robustness of proposed boundary	Eastern and western boundaries would be formed by Quarrier's village boundary and former Bridge of Weir hospital respectively, with northern and southern boundaries to be formed by an existing road and track to the north and south respectively.

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Adjacent to medium/high fluvial flood risk area with surface water flood hazard identified. Flood Risk Assessment submitted with the 2019 planning application was acceptable to both the Council and SEPA. Known hydraulic constraints within the waste water network.
Biodiversity	11	No environmental designations within or in close proximity to the site. A Phase 1 Habitat survey (Oct 2018) submitted with the 2018 planning application found species poor habitat which was of little value in terms of biodiversity. An Otter survey (April 2018) found potential for an indirect impact on otters.
Climatic Factors	7, 5	Likely to increase car travel and associated emissions as site within 400m of a bus stop, but very limited service provision.
Air	13	Short term impacts during the construction phase, but unlikely to lead to the designation of an AQMA
Soil	13,4	No carbon rich soils or priority peatland within site. Development of greenfield land.
Landscape	11	Site is elevated and prominent when entering the village from the Bridge of Weir. It also contributes to the historic and rural character of the village. It is noted that a Landscape and Visual Impact Assessment submitted with the 2018 planning application and the Council's landscape advisor expressed the view that the site could in principle be acceptable in landscape terms, subject to mitigation through appropriate siting, layout and design. Given that the submitted design proposals are the same as those considered not to adequately mitigate landscape impacts by the Council during assessment of planning application 18/0190/IC, it is considered likely that the allocation of the proposed site would result in significant adverse effects on local landscape character and setting.
Material Assets	4	Development of greenfield site
Cultural Heritage	10	The site is in close proximity to the Quarriers Homes Conservation Area. It is noted that the design proposals accompanying the submission are the same as those which the Council considered would have a significant and unacceptable impact on the appearance and setting the Conservation Area during assessment of planning application 18/0190/IC. In light of this, it is likely that the allocation of this site would result in significant adverse effects.
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. Site within 180m of active travel network, but not accessible to local services – 3.9km.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes. Residential development adjacent to all site boundaries with a lane through the south part of the site connecting the areas of housing to the east and west.
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Kilmacolm/Quarrier's Village LNCS Assessment Summary (2017)

Carsemeadow has very little habitat or floristic interest but the site is of value as foraging for bats, related to boundary trees, some of which have roost potential. This site struggles to meet the criteria for LNCS designation.

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	Main access from Craigbet Road to be widened over the length of the development and potential new section of road linking Torr Avenue and Laurel Way. Provide pedestrian links to neighbouring residential estates. Provide pedestrian/ cycle links towards Core Path Network. Suitable visibility should be provided at all accesses. Widen Craigbet Road over length of the development to a minimum width of 5.5m. Footway to be provided along frontage of development site on Craigbet Road. Consider introduction of bus stops on Craigbet Road on development frontage. Parking should be provided in accordance with approved parking standard. Development should include measures to reduce vehicle speeds within the site. Street lighting to be provided throughout site.
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	Scottish Water confirm that there is sufficient water and waste treatment work capacity to service proposed demands, but further investigations may be required to determine impacts on network capacities. No comments received from other utility providers.
Does the proposal raise any educational capacity issues?	Depending on the scale of land identified for housing in the Kilmacolm Primary School catchment, there could be potential capacity issues.

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	Yes – Miller Homes, Cruden Homes and Panacea Homes
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Kilmacolm as a strong market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	It is expected that the site could deliver some housing by 2024 and the remainder by 2032.

Key Agency Comments

HES	No comment
NatureScot	This site is elevated and prominent. Agree with the assessment in the (previous) Call for Sites assessment and a carefully considered approach to siting, design and layout would be necessary if adverse landscape impacts are to be avoided. Any development proposals should retain and enhance the existing landscape framework of woodland and walls, incorporating it into the design of the development, to ensure cohesion with the settlement and surrounding landscape character. Opportunities should be taken to improve and expand the existing active travel provision, linking into the wider network. We welcome the ambition to provide habitat enhancement through open spaces and consider that this should be incorporated into the development brief.
Scottish Forestry	No comment
SEPA	<p>Flood risk: Fluvial – site adjacent to 1 in 200 flood outline. A basic FRA, consisting of topographic information in the first instance and a detailed layout plan will be required. A surface water flood hazard has been identified and should be discussed with FRMA and Scottish Water. Appropriate surface water management measures should be adopted.</p> <p>Water Environment: (1) – Deterioration in status not expected. (2)- The possible sewer capacity issue raised affects localised water quality, not baseline or RBMP. (3)- Sewer Capacity investigation and upgrade if deemed appropriate. (4).- SEPA should not object but make recommendation that a sewer capacity study should be required, and actions taken to bring the sewer up to standard if required.</p>
Scottish Water	<p>There is sufficient water and waste water treatment works capacity to service proposed demands.</p> <p>Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any, this development has on the existing water treatment network.</p> <p>As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>There is a 4 inch water distribution pipe within the boundary of the site as well as some abandoned historic infrastructure - please see Scottish Water advice on infrastructure conflicts.</p> <p>Near-by watercourse which should support a surface water solution - please see Scottish Water advice and policy on Surface Water.</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under Climatic Factors in the SEA summary
Transport Scotland	No comment

Other comments received to MIR consultation

<p>In addition to any representations received from the site promoter or key agencies (see above):</p> <ul style="list-style-type: none"> 13 representations objected to the proposal
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Summary and conclusion

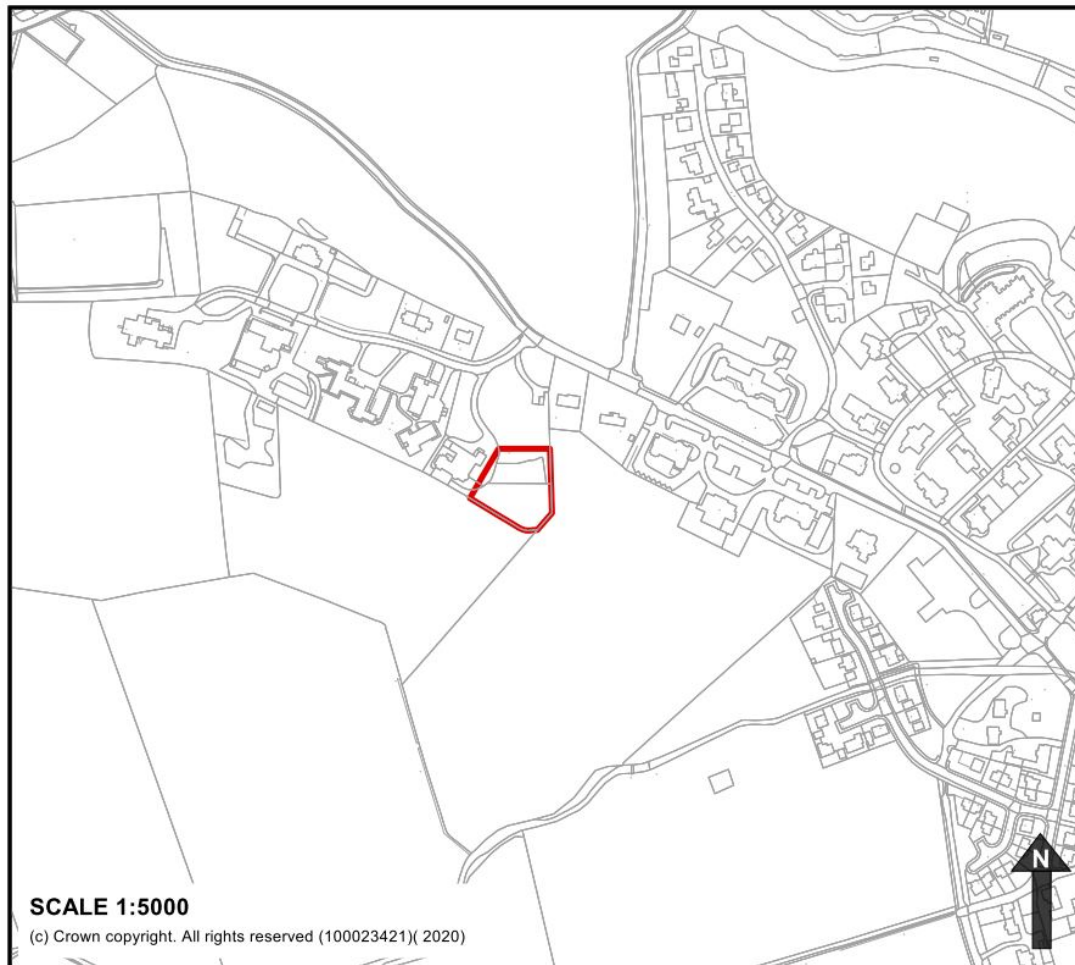
The Carsemeadow site is not known to have any significant technical constraints which would impact deliverability. Identified flood risk, potential water and waste water network issues, and roads infrastructure requirements can be addressed at the planning application stage.

While there are no environmental designations covering the site, development would have significant adverse effects on local landscape setting and character. Development would be contained by existing development and robust green belt boundaries and shouldn't lead to pressure for further greenfield release. There would be a significant and unacceptable impact on the appearance and setting of the nearby Quarriers Homes Conservation Area. Although the site is close to the Core Path Network, it is not within an accessible distance of a frequent public transport service or everyday services available in Kilmacolm.

With regard to the above, and the findings of the Housing Land Technical Report 2021, it is not considered appropriate or necessary to allocate this site for housing development in the Proposed Local Development Plan.

Site Details

Site name	Kaimes Grove
Settlement	Quarriers Village
Call for Sites reference	CFS02
Site size (ha)	0.28
Current use	Garden/shrub
Existing LDP designation	N/a



Proposal

Submitted by	Grosvenor Investments Ltd
Proposed Use	Residential
Number of houses/floorspace	12 semi-detached units for close care use - over 55 (Call for Sites Submission)
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response.	<p>The site is 3 mins walk from the nearest bus stop, with local services available mainly in Kilmacolm and Bridge of Weir. All utility connections are available on site and there are no known constraints affecting development. There is confirmed developer interest from Dalbert International Limited and evidence of demand for residential development in the area. Development would be delivered in the period to 2024 or 2029.</p> <p><u>Supporting Documents</u> None</p> <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u> <i>Biodiversity</i> – The site does have mature trees, but a full tree survey and habitat assessment will be provided in due course. <i>Cultural Heritage</i> – Site lies outside the Conservation Area</p>

Planning History

Planning Applications	09/2002/IC, 13/0004/IC, 16/0034/IC – Conversion of adjacent Woodside Care Home to 7 apartments. Approved - 23/3/2016 19/0016/CPL – Residential school. Approved - 1/11/2019
Previous Plan – Reporters Comments	n/a

Green Belt boundary issues

Robustness of existing boundary	n/a - Within village boundary.
Robustness of proposed boundary	n/a - Within village boundary. Southern and western edge planting should be retained or replaced to maintain/create robust boundary.

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Surface water flood hazard identified. Site in close proximity to the Gotter water. Known hydraulic constraints within the waste water network.
Biodiversity	11	No environmental designations within or in close proximity to the site. Potential adverse effect on broadleaf trees which cover approx. 50% of site. Impact on protected species not known.

Climatic Factors	7, 5	Within 400m of a bus stop, but very limited service provision.
Air	13	Short term impacts during the construction phase, but unlikely to lead to the designation of an AQMA
Soil	13,4	No carbon rich soils or priority peatland within site. Development of greenfield land.
Landscape	11	Potential adverse impact on existing trees along eastern and southern boundaries, which provide landscape setting
Material Assets	4	Development of greenfield site
Cultural Heritage	10	In close proximity to the Quarrier's Homes Conservation Area and a number of listed buildings, but development unlikely to have any effect.
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. Site 490m from core path network, but not within an accessible distance to local services – 3.47km.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	The access road will not be adopted unless it and Law View Road is brought up to an adoptable standard up to the proposed site access. Access should be widened to 5.5m. Requires a footway or traffic calming on the access road. Provide pedestrian links to neighbouring residential estates. Provide pedestrian/ cycle links towards Core Path Network. Suitable visibility should be provided at all accesses. Development should include measures to reduce vehicle speeds within the site.
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	Scottish Water confirm that there is sufficient water and waste treatment work capacity to service proposed demands, but further investigations may be required to determine impacts on network capacities. No comments received from other utility providers.
Does the proposal raise any educational capacity issues?	Depending on the scale of land identified for housing in the Kilmacolm Primary School catchment, there could be potential capacity issues.

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	Yes – Dalbert International Limited
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Quarrier's Village as being within a strong market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	It is expected that the site could be deliver some housing by 2024 and the remainder by 2032.

Key Agency Comments

HES	No comment
NatureScot	This is a relatively small, flat site in the south-west of Quarriers Village. It benefits from an existing landscape framework made up of woodland which should be retained and enhanced, incorporating it into the design of the development.
Scottish Forestry	Broad leaved trees found covering 50%.
SEPA	<p>Flood risk: A surface water flood hazard has been identified and should be discussed with FRMA and Scottish Water. Appropriate surface water management measures should be adopted.</p> <p>Water environment: (1) - Deterioration in status not expected (2)- The possible sewer capacity issue raised affects localised water quality, not baseline or RBMP (3)- Sewer Capacity investigation and upgrade if deemed appropriate (4)- SEPA should not object but make recommendation that a sewer capacity study should be required, and actions taken to bring the sewer up to standard if required</p>
Scottish Water	<p>There is sufficient water and waste water treatment works capacity to service proposed demands.</p> <p>Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any this development has on the existing water treatment network.</p> <p>As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>There is a foul drainage pipe within the boundary of the site - please see Scottish Water advice infrastructure conflicts.</p> <p>Near-by watercourse which should support a surface water solution - please see Scottish Water advice and policy on Surface Water.</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under 'Climatic Factors' in Sustainability Assessment
Transport Scotland	No comment

Other comments received to MIR consultation

In addition to any representations received from the site promoter or key agencies (see above):

- 2 representations objected to the proposal

Summary and conclusion

The Kaimes Grove site is not known to have any significant technical constraints which would impact deliverability. Potential water and waste water network issues and roads infrastructure requirements can be addressed at the planning application stage.

There are no environmental designations covering the site and development is unlikely to have any significant effects on natural heritage, subject to identified mitigation. Development of the site would be contained within the existing village boundary and associated with the conversion of the adjoining former care home to residential apartments. The site is not within an accessible distance of a frequent public transport service or everyday services available in Kilmacolm.

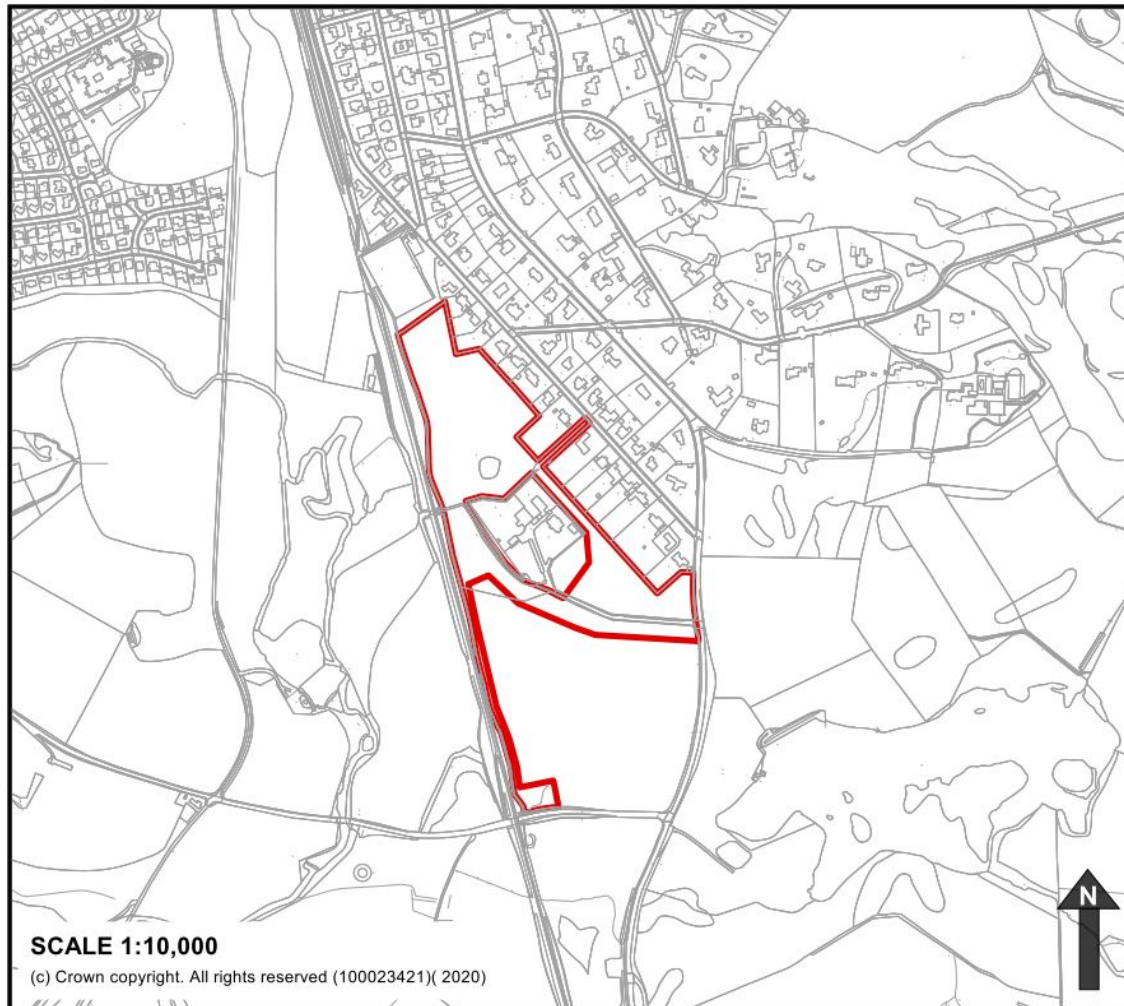
While the site is in a marketable area, the proposal has interest from an identified developer and some housing could be delivered in the period to 2024, it is considered that the proposed capacity of 12 units is excessive.

Due to the site's location within the settlement boundary, if it was not identified as a development opportunity, it would be in the Residential Area where the principle of residential development is established.

The site sits within the settlement boundary, where residential development is acceptable in principle, and is adjacent to an existing development opportunity. Whilst its connectivity/accessibility is poor, these factors and its small scale means that it is considered to be an acceptable housing land allocation in the Proposed Local Development Plan.

Site Details

Site name	North Denniston
Settlement	Kilmacolm
Call for Sites reference	CFS03
Site size (ha)	6.85
Current use	Agriculture
Existing LDP designation	Green Belt



Proposal

Submitted by	Gladman Developments Ltd
Proposed Use	Residential
Number of houses/floorspace	Approx. 75 units (Call for Sites submission)
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response.	<p>Previous LDP promotion and the planning application and appeal process has demonstrated that the site is deliverable, effective and can contribute to meeting the identified housing need. Kilmacolm is a sustainable settlement and allocation of this well-located site will maintain alignment with the sustainability principles. Development of this site will provide private and affordable housing for new and existing residents, create jobs through the construction process and increase expenditure in local shops and public transport use. It would also ensure schools and local services remain viable and economically secure for future generations. All necessary utilities and infrastructure are available and deliverable to the site, and there developer interest in progressing the site.</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> • Site Location Plan • Development Capacity & Green Belt Appraisal • Inverclyde Council Call for Sites Assessment 2017 • Inverclyde Council Report of Handling (19/0041/IC) • Application (19/0041/IC) – Consultation Response – Landscape, Strathclyde Partnership for Transport • Appeal Decisions – PPA-280-2026 and PPA-280-2029 • Confirmation of Market Interest • Supporting documentation from application for Planning Permission in Principle (19/0041/IC): Design and Access Statement, Landscape and Visual Impact Assessment, Indicative Masterplan, Transport Assessment, Flood Risk Assessment and Drainage Strategy, Socio-economic Infographic and Preliminary Ecological Appraisal with Phase 1 Habitat and Protected Species Survey and other environmental and technical documents are already available to the Council via the planning portal <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p><i>Flood Risk</i> – The submitted Flood Risk Assessment and Drainage Strategy shows that development can be accommodated on the site without adverse impacts. The Council, SEPA and Reporter (For Appeal PPA-280-2029) were satisfied with the assessment.</p> <p><i>Biodiversity</i> - The submitted Preliminary Ecological Appraisal found no evidence of protected species within the survey area.</p> <p><i>Greenfield</i> - There is an identified need to develop on greenfield land in order to meet housing needs. Given the nature of Kilmacolm, any development outwith the settlement boundary is likely to be greenfield. While there will be a loss of greenfield land through the allocation of this site there is the potential to increase and improve the public accessibility to the wider land.</p> <p><i>Landscape</i> – The submitted Development Capacity & Green Belt Appraisal considered that there is capacity for development on the northern part of the site and east of the farm steading. This position was supported by the Council’s landscape consultant, City Design Co-Op and subsequently in the Council’s Report of Handling for the application for North Denniston (19/0041/IC), where it was</p>

	<p>concluded that the northern part of North Denniston is “well defined and spatially contained by the edge of Kilmacolm to the north west and by the tree belt on the embankment of the former railway line to the east”. The eastern part of the site is “contained by the low rolling topography”. In addition, the Reporter in the appeal decision considered that due to existing topographical, landscape features and existing developments in the green belt (North Denniston Farm), the site is largely contained (PPA-280-2026 – Paragraph 46). Furthermore, development at North Denniston would have an acceptable impact upon the approach to the town and view from the south, subject to design; “I see no reason why the Council should not be able to insist on the ground south of Puldohran House being laid out as an open space. Finally, the Reporter concluded that; “I find that the proposed development on the North Denniston part of the appeal site could be designed in a manner compatible with the character and amenity of the area” (Paragraph 50).</p> <p><i>Cultural Heritage</i> - There are no known impacts on cultural heritage assets.</p> <p><i>Green Belt</i> - The site does not carry out any useful greenbelt function at present and it is significantly compromised by development at North Denniston Farm steading.</p>
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Planning History

Planning Application History	<p>17/0403/IC – Residential development at Knapps and North Denniston. Refused on 4/7/2018.</p> <p>PPA-280-2026 – Appeal dismissed on 7/1/2019.</p> <p>19/0041/IC – Residential development. Refused on 27/6/2019.</p> <p>PPA-280-2029 - Appeal dismissed on 11/05/2020.</p>
Previous Plan - Reporters Comments	<p>This irregularly shaped site mainly comprises grazing fields and lies west of the A761 Bridge of Weir road. It also includes the area of the former farm buildings of North Denniston that is now occupied by three very large houses. It is bounded by the access road to them, to the south; by the A761, to the west; by the rear boundaries of the large houses on the south-west side of Gryffe Road, to the north-east; by the embankment of the former railway line to the west, which is now a footpath and cycleway; and by an artificial sports pitch to the north. The rolling topography and former railway embankment to the south would serve to limit the impact that development here would have on the setting of Kilmacolm when approaching on the A761, or when viewed from the B788 road to the south. There would be a substantial impact on users of the footpath and cycleway on the former railway line, due to the presence of houses on the adjoining lower land that at present affords a rural setting for, and open views to, the built-up edge of the village. While occupiers of houses on Gryffe Road would also experience a substantially changed outlook, their residential amenity should not otherwise be significantly affected. This site forms one of the ‘fingers’ of countryside that extend towards the centre of Kilmacolm and are considered to be part of Kilmacolm’s character. Its development would erode that character and, to that extent, its setting. I do not consider that its development would result in a significantly stronger settlement boundary. Detailed assessments undertaken of the proposed development of this site have not identified any other significant environmental or ecological impacts that are likely to occur. No infrastructure or other practical constraints have been identified that would prevent its development. Although the site is not at present under the control of a house-builder, given the level of market interest in housing development within Kilmacolm, I have no reason to doubt that the site would be capable of delivering new house completions within the plan period. I am therefore satisfied that the site is capable of becoming effective. Its development would enable 25% of the houses to be used for affordable housing. The current access to the A761 is some 1.3 kilometres from the village centre, and there are bus stops close to this junction. There may also be the opportunity to provide additional pedestrian accesses to Gryffe Road and/or to the former railway footpath, which would significantly</p>

	improve accessibility to most of Kilmacolm's facilities. However, in the current circumstances in which I have found that there is not a requirement to allocate additional housing land in the Kilmacolm and Quarriers Village area of Inverclyde, and in the absence of additional significant benefits being identified which would arise from this site's development, I conclude that its allocation for housing development in this plan would not be justified.
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Green Belt boundary issues

Robustness of existing boundary	Formed by long established rear garden boundaries of Gryffe Road properties.
Robustness of proposed boundary	To be formed by A761 to the east and a former railway line, now NCN75, to the west. The southern boundary does not appear to relate to any significant physical features on the ground.

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Potential flood risk from minor watercourse along site boundary with surface water hazard also identified. Flood Risk Assessment submitted with the planning application was acceptable to the Council and SEPA. Known hydraulic constraints within the waste water network.
Biodiversity	11	No environmental designations within or in close proximity to the site. A Preliminary Ecological Appraisal (2019) submitted with planning application 19/0041/IC found no evidence of protected species on site, although habitats on and adjacent to the site offer suitability for bats, otters, badgers and other no protected species.
Climatic Factors	7, 5	Car travel and associated emissions will be minimized as site within 400m of bus stop with at least 1 bus per hour between 7am and 7pm on weekdays
Air	13	Short term impacts during the construction phase, but unlikely to lead to the designation of an AQMA
Soil	13,4	No carbon rich soils or priority peatland within site. Development of greenfield land.
Landscape	11	While noting the findings of the Landscape and Visual Impact Assessment and the Development Capacity & Green Belt Appraisal, it is considered that development of the site would have an adverse impact on the landscape character and setting of the village by extending the existing settlement in a southerly direction along Bridge of Weir Road, which is a prominent approach to the village, thereby exacerbating the impact the existing North Denniston buildings have on this approach to the village.
Material Assets	4	Development of greenfield land
Cultural Heritage	10	Potential for adverse effects on the Duchal House Designed Landscape, which is in close proximity to the site.
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. Opportunities to link with adjacent active travel network. Site 290m from active travel network, but not within accessible distance of local services – 900m.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Kilmacolm/Quarrier's Village LNCS Assessment Summary (2017)

<p>(The following assessment applies to a larger site (extending to the B753) submitted in the 2016 Call for Sites process)</p> <p>North Denniston is intensively managed and thus of low habitat or botanical interest, unless changes in management were to be introduced, that could encourage breeding birds (such as Skylark) or wintering geese flocks this site struggles to meet LNCS criteria. There are only a few small or marginal features noted, which provide some floristic interest and potential for fauna.</p>

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure?	<p>Access to the site from Bridge of Weir Road.</p> <p>Provide pedestrian/ cycle links to Gryffe Road and N75.</p> <p>Suitable visibility should be provided at all accesses.</p> <p>Requires footway, street lighting and 30mph speed limit to be extended southward beyond the access point.</p> <p>Consider introduction of bus stops on Bridge of Weir Road on development frontage.</p> <p>Parking should be provided in accordance with approved parking standard.</p> <p>Development should include measures to reduce vehicle speeds within the site.</p>
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	<p>Scottish Water confirm that there is sufficient water and waste treatment work capacity to service proposed demands, but further investigations may be required to determine impacts on network capacities.</p> <p>No comments received from other utility providers.</p>
Does the proposal raise any educational capacity issues?	Depending on the scale of land identified for housing in the Kilmacolm Primary School catchment, there could be potential capacity issues.

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	Yes - Barratt Homes, Lovell and Westpoint Homes
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Kilmacolm as a strong market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	It is expected that the site could deliver some housing by 2024 and remainder by 2032.

Key Agency Comments

HES	We note that this potential allocation proposes housing in the vicinity of the Duchal House Inventory Designed Landscape (GDL146). We would expect that any development in this location is carefully designed to take into account impacts on the setting of the Inventory Designed Landscape.
NatureScot	<p>Development on this site would be visible from the A761 Bridge of Weir Road at the entrance to the village. Adverse impact on settlement pattern by significantly extending the village into the Green Belt and creating a new entrance to the village.</p> <p>This is a large and prominent site, which defines the southern landscape setting and contributes to the characteristic gateway and approach to Kilmacolm from the south. The site is visually open and would represent a substantial southward expansion of Kilmacolm. Development would have significant and adverse impacts on local landscape character and on the landscape setting of the existing village.</p> <p>There may be some landscape capacity in the northern most part of the site – north of North Denniston Farm – where the site is lower lying and more contained in landscape terms. Landscape capacity would need more detailed consideration.</p> <p>Note that a masterplan has been developed for the site setting out where there is considered to be capacity (north and east of site).</p>
Scottish Forestry	NWSS Mixed Deciduous woodland along the NW of the sign by the cycle way. Broadleaved trees found in the south square of the site.
SEPA	<p>Flood risk - A minor watercourse with potentially culverted sections flows along the site boundary which could represent a potential flood risk. A basic FRA, consisting of topographic information in the first instance and a detailed layout plan will be required. A surface water flood hazard has been identified and should be discussed with FRMA and Scottish Water. Appropriate surface water management measures should be adopted.</p> <p>Water environment - There is a small watercourse, possibly partly in culvert, at the boundary of the site, some minor deculverting and morphological improvement works could greatly enhance this small part of the water environment</p>
Scottish Water	<p>There is sufficient water and waste water treatment works capacity to service proposed demands.</p> <p>Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any this development has on the existing water treatment network.</p> <p>As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>There is a combined pipe within the boundary of the site – please see Scottish Water advice infrastructure conflicts.</p> <p>Near-by watercourse which should support a surface water solution - please see Scottish Water advice and policy on Surface Water.</p>

Sportscotland	We request that acknowledgement is made to the existence of playing fields adjacent to these sites, and that any design proposals should take this into account to ensure protected access and amenity for existing pitch users.
SPT	Public transport accessibility information provided under 'Climatic Factors' in Sustainability Assessment
Transport Scotland	No comment

Other comments received to MIR consultation

In addition to any representations received from the site promoter or key agencies (see above)

- 6 representations objected to the proposal on a variety of grounds, including landscape and visual impacts, flood risk, not meeting green belt, sustainability and placemaking criteria, and on the basis that there is no need for additional housing land.

Summary and conclusion

The North Denniston site is not known to have any significant technical constraints which would impact deliverability. Identified flood risk and potential water and waste water network issues can be addressed at the planning application stage.

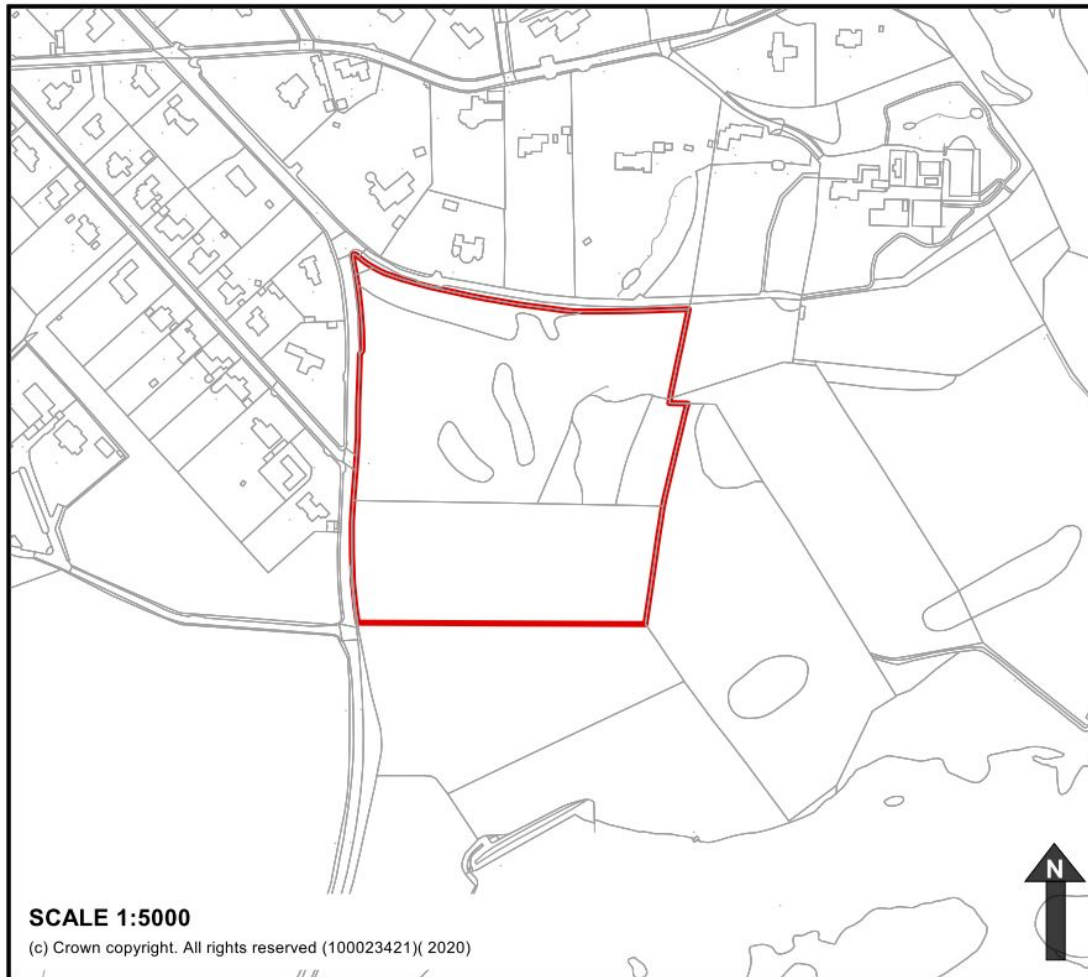
While there are no environmental designations covering the site, development of the site would have a significant adverse impact on the landscape character and setting of the village. HES highlight the sites proximity to the Duchal House Garden and Designed Landscape. The site is immediately adjacent to the Core Path Network and within an accessible distance of a regular public transport service. It is not accessible to everyday services in Kilmacolm.

The site is in a marketable area, the proposal has interest from an identified developer, and it is considered that some housing could be delivered in the period to 2024, with the remainder in the period to 2032.

With regard to the above and the findings of the Housing Land Technical Report 2021, it is not considered appropriate or necessary to allocate this site for housing development in the Proposed Local Development Plan.

Site Details

Site name	Knapps (1)
Settlement	Kilmacolm
Call for Sites reference	CFS04
Site size (ha)	5.51
Current use	Agriculture
Existing LDP designation	Green Belt



Proposal

Submitted by	Iceni Projects Ltd
Proposed Use	Retirement living village
Number of houses/floorspace	30-bed care home, 50 apartments, 50 bungalows, amenity block
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response.	<p>LCR Developments Ltd would deliver the retirement village element of the proposal, which typically includes retirement apartments and bungalows available for sale or rent, a care home and amenity block with pool, spa, restaurant and other complementary services. It would be operated by LifeCare Residences. The proposal would meet local demand for retirement living and care facility and provide significant new employment opportunities in Kilmacolm and for the Inverclyde area. LifeCare typically employs between 80 and 100 full time equivalent (FTE) members of staff per village.</p> <p>Technical studies completed for planning application 17/0143/IC confirm that it is free from any significant abnormal development constraints. All necessary utilities and infrastructure are available and deliverable. The proposed development would provide any necessary improvements to infrastructure to facilitate development.</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> • Detailed Submission – Inverclyde LDP3 Cal for Sites • MIR representation <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p><i>Flood Risk</i> – Flood Risk Assessment submitted with application 17/0143/IC was acceptable to SEPA.</p> <p><i>Biodiversity</i> – The site is not subject to any environmental designations. The proposed development could offer opportunities to enhance biodiversity in the area through landscape proposals.</p> <p><i>Landscape</i> – Development would be designed to sit within the terrain and involve cutting into the slope and using green roofs to minimise any visual impact. Landscaping buffers to the south of the site and a defined green link through the site to Knapps Loch would be incorporated.</p> <p><i>Greenfield</i> – Development on greenfield land is considered appropriate given the demand for the care facilities and retirement living accommodation with supporting amenities in the area. It would also enable development to deliver higher quality and more extensive gardens and an appropriate setting for the proposed development.</p> <p><i>Cultural Heritage</i> – A Heritage Impact Assessment submitted with planning application 17/0403/IC found no known heritage assets within the site and that the proposed development would not have any significant adverse effects on the character or setting of Kilmacolm Conservation Area or other heritage assets outwith the site.</p>

Planning History

Planning Application History	17/0403/IC – Proposed residential development etc. at Knapps and North Denniston. Refused on 4/7/2018.
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	PPA-280-2026 – Appeal dismissed on 7/1/2019.
Previous Plan – Reporters Comments	<p>This greenfield site lies at the south-eastern edge of Kilmacolm. It occupies a generally square shaped, largely open field, bounded by the A761 Bridge of Weir road, and by a vehicular lane which extends along the boundaries of some large detached houses that occupy very large plots. This lane also forms the boundary of the conservation area, of which these houses comprise part. There is a thick belt of pine trees on the site's eastern edge, but its southern boundary is open. The site rises to the north-east, from the A761. This makes it particularly prominent to those approaching Kilmacolm along the main access road, despite the presence of the houses on Gryffe Road, which stand to the west, across the A761. The site is at present part of the green belt, which here makes a significant contribution to the setting of Kilmacolm. Knapps Loch lies to the south, and contributes to the amenity of the green belt in this area. Development here would also impact to some degree on the setting of the loch. The council's assessments of this site for this plan, and separately in relation to a recent planning application, confirm that, subject to detailed consideration, there are no infrastructure or other environmental constraints that would be likely to preclude a satisfactory development being undertaken here. While the site is not at present under the control of a house-builder, there is little doubt that there would be a market for new houses in this location. I am therefore satisfied that this is a site which would be capable of becoming effective, and could deliver house completions during the plan period. A small number of the suggested 12 houses could also be secured for affordable housing. It is on the main road to Bridge of Weir and the Glasgow conurbation, and is served by public transport. There are bus stops adjacent to the site on either side of the road. Being some 1.3 kilometres from the village centre, there is also good access to the facilities of Kilmacolm, via the existing roadside footway. Nonetheless, I have concluded both that there is not a requirement to allocate additional land for housing in Kilmacolm, and that its development would have an adverse impact on the setting of Kilmacolm. I have not identified any further benefits that would be generated by the development of housing on this site which would justify allocating it for that purpose.</p>

Green Belt boundary issues

Robustness of existing boundary	Formed by access road to villas along Kilmacolm's southern boundary.
Robustness of proposed boundary	To be formed by the A761 to the west. Other boundaries do not appear to relate to any significant physical features on the ground.

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Flood risk from minor watercourse along site boundary and surface water flood hazard identified. Flood Risk Assessment submitted with application 17/0403/IC was acceptable to SEPA and the Council. Known hydraulic constraints within the waste water network.
Biodiversity	11	No environmental designations within the site. While the Knapps Loch LNCS is in close proximity to the southern site boundary, development is unlikely to have any effect. It is noted that a Preliminary Ecological Appraisal submitted with planning application 17/0403/IC found that protected species were present on site and that a number of further surveys were required to identify any potential adverse effects. The appraisal also identified a number of optional enhancement measures. Strip of woodland within eastern boundary.

Climatic Factors	7, 5	Car travel and associated emissions will be minimized as site within 400m of a bus stop with at least 1 bus per hour between 7am and 7pm on weekdays
Air	13	Short term impacts during the construction phase, but unlikely to lead to the designation of an AQMA
Soil	13,4	No carbon rich soils or priority peatland within site. Development of greenfield land.
Landscape	11	This is an open, elevated and prominent site which defines the southern landscape setting and approach to Kilmacolm. While noting that a 2018 Landscape Capacity and Greenbelt Study stated that “it is considered that the land at Knapps has capacity to accommodate new development without significantly affecting the existing settlement form; the gateway approach and landscape setting; and the characteristics of the Green Belt to the south of Kilmacolm”, the Council considers that development would have significant and adverse impacts on local landscape character and the landscape setting of the village.
Material Assets	4	Development of greenfield site
Cultural Heritage	10	The northern boundary of the site is adjacent to the Kilmacolm South Conservation area. Development could have significant adverse effects on the setting and appearance of the conservation area, particularly in relation to the southern approach to the village.
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. Site is 720m from the active travel network, but not within accessible distance of local services – 1070m.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Kilmacolm/Quarrier's Village LNCS Assessment Summary (2017)

<p>Knapps Loch is largely pasture but appears to have lost some of the interest previously noted, but some local ridges and wetter hollows retain some interest. The northern field, which supports a cluster of less intensely managed habitats, but of limited quality, could benefit from more sympathetic management, but it does not merit any designation in isolation and in its current condition as it is isolated. However it has value for foraging bats and Badgers. However, it is proposed that the southern wetland and adjacent scrubby ridges section is included and becomes part of the Knapps Loch LNCS.</p> <p>(The above assessment related to a previously submitted larger site. The extended boundary of the LNCS covers only a small part of the submitted site in its south eastern corner).</p>

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision (comments provided by Council's Roads service)	Access to the site from Bridge of Weir Road. Provide pedestrian/ cycle links towards Bridge of Weir Road. Suitable visibility should be provided at all accesses. Requires footway, street lighting and 30mph speed limit to be extended southward beyond the access point. Consider introduction of bus stops on Bridge of Weir Road on development frontage. Parking should be provided in accordance with approved parking standard. Development should include measures to reduce vehicle speeds within the site.
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	Scottish Water confirm that there is sufficient water and waste treatment work capacity to service proposed demands, but further investigations may be required to determine impacts on network capacities. No comments received from other utility providers.
Does the proposal raise any educational capacity issues?	Depending on the scale of land identified for housing in the Kilmacolm Primary School catchment, there could be potential capacity issues.

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	Yes – LCR Developments Ltd
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Kilmacolm as a strong market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	It is expected that the site could deliver some housing by 2024 and remainder by 2032.

Key Agency Comments

HES	No comment
NatureScot	This is a large, elevated and prominent site which defines the southern landscape setting to Kilmacolm. The site is visually open. Development would have significant and adverse impacts on local landscape character and on the landscape setting of the village.
Scottish Forestry	NFI Mixed Mainly Conifer woodland in a strip on the east side of this site. Broad leaved trees found sporadically through the site found mostly in the north west corner of the site.
SEPA	Flood risk - A minor watercourse with potentially culverted sections flows adjacent to the site boundary which could represent a potential flood risk. A basic FRA, consisting of topographic information in the first instance and a detailed layout plan will be required. A surface water flood

	<p>hazard has been identified and should be discussed with FRMA and Scottish Water. Appropriate surface water management measures should be adopted.</p> <p>Water environment - There is a small watercourse, possibly partly in culvert, at the boundary of the site, some minor de-culverting and morphological improvement works could greatly enhance this small part of the water environment</p>
Scottish Water	<p>There is sufficient water and waste water treatment works capacity to service proposed demands.</p> <p>Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any this development has on the existing water treatment network.</p> <p>There are known hydraulic constraints within the waste water network, and known local flooding hot spots. Therefore it is likely that the developer be requested to carry out further investigations such as Drainage Impact Assessments.</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under ' Climatic Factors' in Sustainability Assessment
Transport Scotland	No comment

Other comments received to MIR consultation

<p>In addition to any representations received from the site promoter or key agencies (see above):</p> <ul style="list-style-type: none"> • 8 representations objected to the proposal on a variety of grounds, including unnecessary development in the green belt, not meeting sustainability, placemaking and green belt criteria, flood risk, ecological impacts, visual impacts from southern approach, and more generally on the grounds cited in the planning application refusal. • 1 supported the housing element of the proposal • 2 supported the retirement village element of the proposal

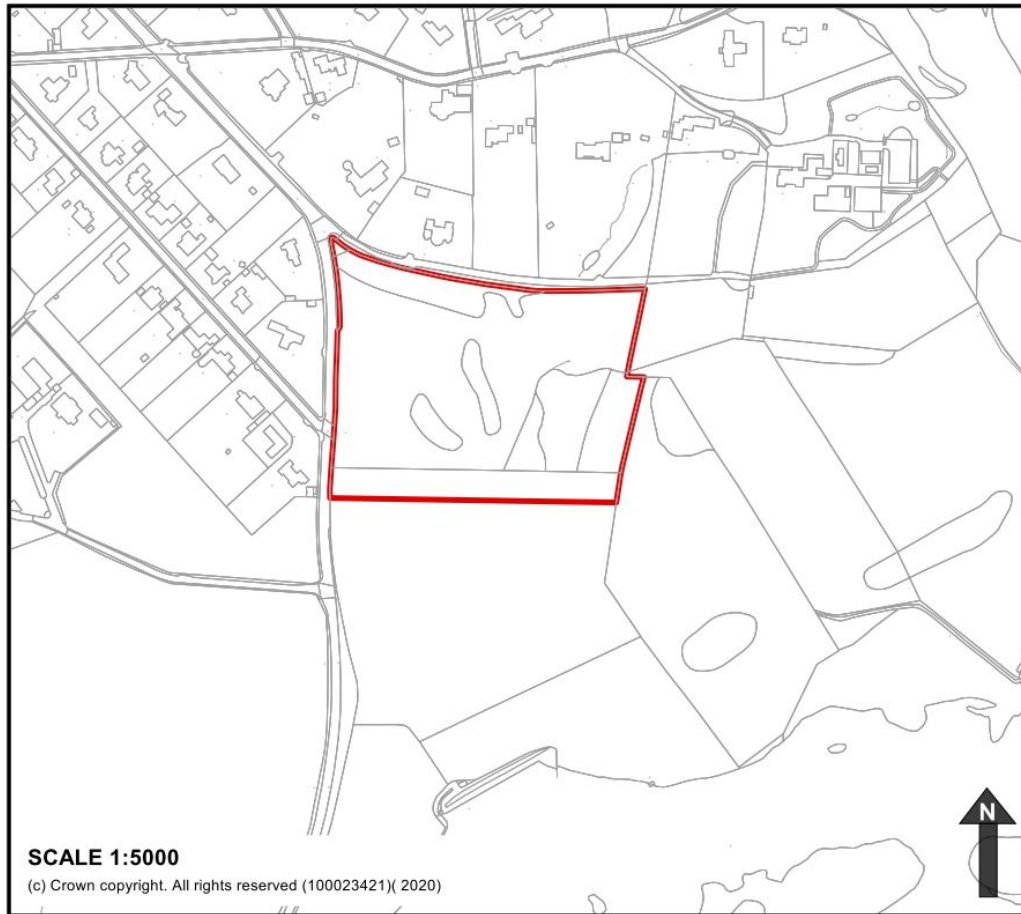
Summary and conclusion

<p>The Knapps (1) site is not known to have any significant technical constraints which would impact deliverability. Identified flood risk and potential water and waste water network issues can be addressed at the planning application stage.</p> <p>While development is unlikely to have any significant effects on natural heritage, subject to identified mitigation, there would be significant adverse effects on the Conservation Area adjacent to the northern site boundary and on the landscape character and setting of the village. While further southern expansion would be contained by Knapps Loch, a clearly identifiable settlement boundary would have to be created. Development would also impact on the setting of Knapps Loch, which is a locally important recreational resource.</p> <p>While the site is within an accessible distance of a regular public transport service, it not within an accessible distance of everyday services in Kilmacolm.</p> <p>The site is in a marketable area, an identified developer is interested in the proposal, and it is considered that some housing could be delivered in the period to 2024, with the remainder in the period to 2032.</p>
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With regard to the above and the findings of the Housing Land Technical Report 2021, it is not considered appropriate or necessary to allocate this site for housing development in the Proposed Local Development Plan.

Site Details

Site name	Knapps (2)
Settlement	Kilmacolm
Call for Sites reference	CFS05
Site size (ha)	3.87
Current use	Agriculture
Existing LDP designation	Green Belt



Proposal

Submitted by	Gladman Developments Ltd
Proposed Use	Residential
Number of houses/floorspace	30 houses, retirement living, care facility.
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response.	<p>To address the Council's concerns about a larger site previously submitted for inclusion in LDP2, the proposal comprises a much smaller area of land. Through previous LDP promotion and the planning application and appeal process, it has been demonstrated that the site is deliverable, effective and can make a contribution to the identified housing need of a scale and nature that is complementary to the village. Kilmacolm is a sustainable settlement and allocation of this well-located site will maintain alignment with the sustainability principles and make a valuable contribution towards existing services and infrastructure within Kilmacolm and the surrounding area. All necessary utilities and infrastructure are available and deliverable to the site. There is confirmed developer interest from LifeCare Residences Ltd. and various plc. Housebuilders</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> • Site Location and Appraisal Plan • Inverclyde Council SEA Call for Sites Assessment 2017 • Knapps Development Capacity and Greenbelt Appraisal (June 2018) • Appeal Decision – PPA-280-2026 – • Key documents from planning application (17/0403/IC) – Design and Access Statement, Landscape and Visual Impact Assessment, Indicative Masterplan, Transport Assessment, Flood Risk Assessment and Drainage Strategy, Socio-economic Infographic and Preliminary Ecological Appraisal with Phase 1 Habitat and Protected Species Survey. Other environmental and technical documents are available to the council via their planning portal. • MIR representation <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p><i>Flood Risk</i> – In relation to planning application 17/0403/IC, the planning officer's report concluded that "...I am therefore satisfied that there is nothing to suggest that matters relating to flooding and drainage cannot be appropriately addressed as part of any development...".</p> <p><i>Biodiversity</i> – Previous concerns raised by the Council are negated by the vastly reduced site area. SNH (NatureScot) and the Council accepted that updated surveys and protection plans for protected species, in line with the mitigation measures from section 5.3 of the Preliminary Ecological Assessment (PEA) submitted with application 17/0403/IC, could be provided at the detailed application stag.</p> <p><i>Soil</i> – No concerns over soil sealing and compaction came to light in the assessment of recent planning applications.</p> <p><i>Landscape</i> – The WYG Landscape Capacity and Greenbelt Study 2018 states that "it is considered that the land at Knapps has capacity to accommodate new development without significantly affecting the existing settlement form; the gateway approach and landscape setting; and the characteristics of the Green Belt to the south of Kilmacolm". The reduction of the site area is based on careful assessment and is specifically designed to avoid elevated areas and work with the natural landform to minimise visual impacts. Through</p>

	<p>the adoption of a design-led approach, new development could be introduced which complements the existing settlement edge; the Conservation Area characteristics; and the arrangement of large prominent villas visible on the well-wooded rising ground to the north of the site.</p> <p><i>Greenfield</i> - Whilst the proposed development would reduce the amount of greenfield land, in effect, this would amount to only a very small percentage of a much wider estate.</p> <p><i>Cultural Heritage</i> – In appeal decision PPA-280-2026 the Reporter concluded that “the proposed development would not have a significant and unacceptable impact on the setting and appearance of the conservation area”.</p> <p><i>Population and Health</i> – Site is within an accessible walking distance of local services – 1.27km.</p> <p><i>Greenbelt</i> – The existing Green Belt boundary is considered weak along much of the southern edge of Land at Knapps, where it is defined by garden boundary features and access tracks. The proposed development would require the southern inner Green Belt edge to be redefined along the southern edge of the development with the proposed boundary extending along the existing field boundary wall. Development of the proposed site would not represent a major incursion into the Green Belt given the scale of its coverage across much of Inverclyde. As the proposed development would not extend the settlement further to the south, there would be no resulting coalescence with the settlements located to the south and south east</p>
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Planning History

Planning Applications	17/0403/IC – Proposed residential development etc. at Knapps and North Denniston. Refused on 4/7/2018. PPA-280-2026 – Appeal dismissed on 7/1/2019.
Previous Plan – Reporters Comments	This greenfield site lies at the south-eastern edge of Kilmacolm. It occupies a generally square shaped, largely open field, bounded by the A761 Bridge of Weir road, and by a vehicular lane which extends along the boundaries of some large detached houses that occupy very large plots. This lane also forms the boundary of the conservation area, of which these houses comprise part. There is a thick belt of pine trees on the site’s eastern edge, but its southern boundary is open. The site rises to the north-east, from the A761. This makes it particularly prominent to those approaching Kilmacolm along the main access road, despite the presence of the houses on Gryffe Road, which stand to the west, across the A761. The site is at present part of the green belt, which here makes a significant contribution to the setting of Kilmacolm. Knapps Loch lies to the south, and contributes to the amenity of the green belt in this area. Development here would also impact to some degree on the setting of the loch. The council’s assessments of this site for this plan, and separately in relation to a recent planning application, confirm that, subject to detailed consideration, there are no infrastructure or other environmental constraints that would be likely to preclude a satisfactory development being undertaken here. While the site is not at present under the control of a house-builder, there is little doubt that there would be a market for new houses in this location. I am therefore satisfied that this is a site which would be capable of becoming effective, and could deliver house completions during the plan period. A small number of the suggested 12 houses could also be secured for affordable housing. It is on the main road to Bridge of Weir and the Glasgow conurbation, and is served by public transport. There are bus stops adjacent to the site on either side of the road. Being some 1.3 kilometres from the village centre, there is also good access to the facilities of Kilmacolm, via the existing roadside footway.

	Nonetheless, I have concluded both that there is not a requirement to allocate additional land for housing in Kilmacolm, and that its development would have an adverse impact on the setting of Kilmacolm. I have not identified any further benefits that would be generated by the development of housing on this site which would justify allocating it for that purpose.
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Green Belt boundary issues

Robustness of existing boundary	Formed by access road to villas along Kilmacolm's southern boundary.
Robustness of proposed boundary	Formed by the A761 to the west. Other boundaries do not appear to relate to any significant physical features on the ground

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Potential flood risk from minor watercourse along site boundary and surface water flood hazard identified. Flood Risk Assessment submitted with application 17/0403/IC was acceptable to SEPA and the Council. Known hydraulic constraints within the waste water network.
Biodiversity	11	No environmental designations within the site. While the Knapps Loch LNCS is in close proximity to the southern site boundary, development is unlikely to have any effect. It is noted that a Preliminary Ecological Appraisal submitted with planning application 17/0403/IC found that protected species were present on site and that a number of further surveys were required to identify any potential adverse effects. The appraisal also identified a number of optional enhancement measures. Strip of woodland within eastern boundary.
Climatic Factors	7, 5	Car travel and associated emissions will be minimized as site within 400m of a bus stop with at least 1 bus per hour between 7am and 7pm on weekdays
Air	13	Short term impacts during the construction phase, but unlikely to lead to the designation of an AQMA
Soil	13,4	No carbon rich soils or priority peatland within site. Development of greenfield land.
Landscape	11	This is an open, elevated and prominent site which defines the southern landscape setting and approach to Kilmacolm. While noting that a 2018 Landscape Capacity and Greenbelt Study stated that "it is considered that the land at Knapps has capacity to accommodate new development without significantly affecting the existing settlement form; the gateway approach and landscape setting; and the characteristics of the Green Belt to the south of Kilmacolm", the Council considers that development would have significant and adverse impacts on local landscape character and the landscape setting of the village.
Material Assets	4	Development of greenfield land
Cultural Heritage	10	The northern boundary of the site is adjacent to the Kilmacolm South Conservation area. Development could have significant adverse effects on the setting and appearance of the conservation area, particularly in relation to the southern approach to the village.
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. Site is 720m from the active travel network. Not within accessible distance of local services – 1070m.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Kilmacolm/Quarrier's Village LNCS Assessment Summary (2017)

Knapps Loch is largely pasture but appears to have lost some of the interest previously noted, but some local ridges and wetter hollows retain some interest. The northern field, which supports a cluster of less intensely managed habitats, but of limited quality, could benefit from more sympathetic management, but it does not merit any designation in isolation and in its current condition as it is isolated. However it has value for foraging bats and Badgers. However, it is proposed that the southern wetland and adjacent scrubby ridges section is included and becomes part of the Knapps Loch LNCS.
(The above assessment related to a previously submitted larger site. The extended boundary of the LNCS does not extend onto the site proposed in this submission).

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision? (comments by Council's Roads service)	Access to the site from Bridge of Weir Road. Provide pedestrian/ cycle links towards Bridge of Weir Road. Suitable visibility should be provided at all accesses. Requires footway, street lighting and 30mph speed limit to be extended southward beyond the access point. Consider introduction of bus stops on Bridge of Weir Road on development frontage. Parking should be provided in accordance with approved parking standard. Development should include measures to reduce vehicle speeds within the site.
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	Scottish Water confirm that there is sufficient water and waste treatment work capacity to service proposed demands, but further investigations may be required to determine impacts on network capacities. No comments received from other utility providers.
Does the proposal raise any educational capacity issues?	Depending on the scale of land identified for housing in the Kilmacolm Primary School catchment, there could be potential capacity issues.

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	Yes – LifeCare Residences Ltd and various unnamed plc. housebuilders
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Kilmacolm as a strong market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	It is expected that the site could deliver some housing by 2024 and remainder by 2032.

Key Agency Comments

HES	No comment
NatureScot	This is a large, elevated and prominent site which defines the southern landscape setting to Kilmacolm. The site is visually open. Development would have significant and adverse impacts on local landscape character and on the landscape setting of the village.
Scottish Forestry	NFI Mixed Mainly Conifer woodland in a strip on the east side of this site. Broad leaved trees found sporadically through the site found mostly in the north west corner of the site.
SEPA	<p>Flood risk - A minor watercourse with potentially culverted sections flows adjacent to the site boundary which could represent a potential flood risk. A basic FRA, consisting of topographic information in the first instance and a detailed layout plan will be required. A surface water flood hazard has been identified and should be discussed with FRMA and Scottish Water. Appropriate surface water management measures should be adopted.</p> <p>Water environment - There is a small watercourse, possibly partly in culvert, at the boundary of the site, some minor de-culverting and morphological improvement works could greatly enhance this small part of the water environment</p>
Scottish Water	<p>There is sufficient water and waste water treatment works capacity to service proposed demands.</p> <p>Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any this development has on the existing water treatment network.</p> <p>There are known hydraulic constraints within the waste water network, and known local flooding hot spots. Therefore it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under ' Climatic Factors ' in Sustainability Assessment
Transport Scotland	No comment

Other comments received to MIR consultation

In addition to any representations received from the site promoter or key agencies (see above):

- 8 objected to the proposal on a variety of grounds, including unnecessary development in the green belt, not meeting sustainability, placemaking and green belt criteria, flood risk, ecological impacts and more generally on the grounds cited in the planning application refusal.
- 1 supported the housing element of the proposal
- 2 supported the retirement village element of the proposal

Summary and conclusion

The Knapps (2) site is not known to have any significant technical constraints which would impact deliverability. Identified flood risk and potential water and waste water network issues can be addressed at the planning application stage.

While development is unlikely to have any significant effects on natural heritage, subject to identified mitigation, there would be significant adverse effects on the Conservation Area adjacent to the northern site boundary and on the landscape character and setting of the village. While further southern expansion would be contained by Knapps Loch, a clearly identifiable settlement boundary would have to be created. Development would also impact on the setting of Knapps Loch, which is a locally important recreational resource.

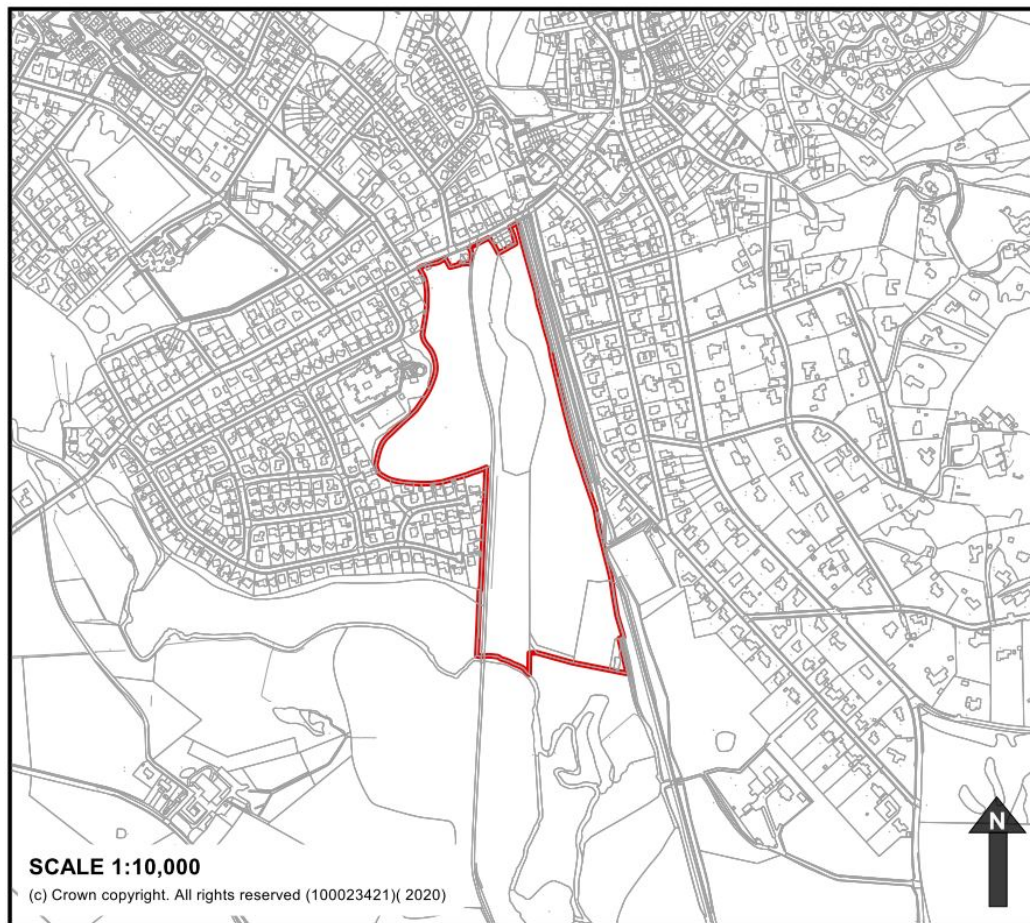
While the site is within an accessible distance of a regular public transport service, it is not within an accessible distance of everyday services in Kilmacolm.

The site is in a marketable area, an identified developer is interested in the proposal, and it is considered that some housing could be delivered in the period to 2024, with the remainder in the period to 2032.

With regard to the above and the findings of the Housing Land Technical Report 2021, it is not considered appropriate or necessary to allocate this site for housing development in the Proposed Local Development Plan.

Site Details

Site name	Police Station Field
Settlement	Kilmacolm
Call for Sites reference	CFS06
Site size (ha)	13.36
Current use	Woodland, rough pasture
Existing LDP designation	Green belt



Proposal

Submitted by	CALA Homes (West) Ltd
Proposed Use	Residential
Number of houses/floorspace	45-55 homes (Call for Sites submission)
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response.	<p>The Police Station Field proposal will deliver 93 new homes (24 affordable) across a range of house types and sizes, provide land for a new public car park and new pedestrian and cycle connections links between existing homes in Kilmacolm and Milton Wood. Approx. 7.5 hectares will be developed for residential development, with the remainder of the site remaining as open space and existing woodland, thereby ensuring that existing natural landscape features are retained on the site and providing the opportunity to create a unique development setting. The proposed site can be serviced with all necessary utility connections. The proposal will be immediately effective and constructed over a 3 year period during the LDP 3 plan period, as demonstrated in the submitted site effectiveness statement. The proposal would contribute to the market requirements and the acknowledged shortfall in housing land in this area.</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> • Site Location Plan; • Masterplan; • Site Assessment Review; • Site Effectiveness Statement; • Development Framework Report; • Flood Risk Assessment; • Heritage Appraisal; • Tree Summary Report; and • Woodland Management Plan. • MIR representation <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p><i>Flood Risk</i> - Submitted Flood Risk Assessment confirms that the proposal will not be at risk of flooding</p> <p><i>Biodiversity</i> - Development will be focused in the north eastern area of the site to ensure that it does not adversely impact the quality and character of the environmentally sensitive areas within the wider site. In line with the recommendations of a Tree Survey, category A and B trees will be retained and a Woodland Management Plan delivered. The latter will improve the quality of Milton Wood. An Ecological Assessment will be prepared at the appropriate time to ensure any impacts on the natural environment are mitigated.</p> <p><i>Landscape/Green Belt</i> - Development can be sensitively integrated into the wider area through the retention of the existing woodland located along the western boundary of the site, reinstatement of an avenue of trees on either side of Core Path 46 (Milton Wood, Kilmacolm) and delivery of a Woodland Management Plan. The proposal will, therefore, retain a considerable area of the 'green wedge'</p>

	<p>which links the settlement of Kilmacolm with the countryside beyond. There will be no adverse impact on the character of Kilmacolm arising from development on this site, as the development will not alter the nature of the urban context in terms of its overall character.</p> <p><i>Cultural Heritage</i> - The submitted Heritage Appraisal determined that, in the wider context of the Duchal Garden and Designed Landscape designation, the historic features of the site ...have low significance in relation to their contribution to the special character of the designated Designed Landscape. Only the western part of the site (Milton Wood) is located within the Garden and Designed Landscape designation. The proposal will focus development outwith this designation. The Appraisal confirms that part of Milton Wood is now dominated by an area of birch scrub, which is proposed to be removed as part of the proposal. This area of birch scrub is not considered to form part of the original Milton Wood, nor is it considered to form part of the designation's overall quality or character. The loss of this area will not affect the wider qualities of the designated Duchal House Garden and Designed Landscape.</p>
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Planning History

Planning Applications	12/0150/IC – Planning application in principle for new school development. Refused on 21/1/2013
Previous Plan - Reporters Comments	<p>(Comments relate to a larger site extending west along River Gryffe)</p> <p>This large elongated greenfield site forms one of the fingers of the present green belt which is considered to contribute to the character of Kilmacolm. It lies on the western side of the former railway line that now forms a footpath and cycleway leading out from the centre of the village at Lochwinnoch Road. The site extends as far as the Gryfe Water, beyond the southern edge of the village. It generally comprises open fields on its eastern side, while its western side is a wooded area, known as Milton Wood. A private driveway leading south through this woodland from Lochwinnoch Road provides a public footpath, which is a core path. The proposed housing development, as illustrated in a submission which accompanied the representation, would be focused on the currently open area, with footpath connections to the core path. However it would encroach within the local nature conservation site which covers both the woodland and the area of water-side habitat on either side of the Gryfe Water. The development proposed on this site is therefore likely to have a direct impact on the local nature conservation site, as well as the indirect pressures which arise from the occupiers of properties which adjoin mature woodland. In addition, the site forms part of the designed landscape of Duchal House, which forms part of Scotland's 'Inventory of Gardens and Designed Landscapes'. There is already a substantial residential area to the west of the woodland, and I consider that further development immediately on its eastern side would detract from its integrity and its contribution to Kilmacolm's setting. The value of the footpath to its users is enhanced by the woodland being bordered by open grazing fields, rather than by being overlooked and abutted by residential properties. However the development of housing on this site would have a much more limited impact on walkers and cyclists using the path along the line of the former railway. This is because, for most of the length of the site, the path is in a steep cutting, from which the houses would not be visible. While a flood risk assessment would have to be undertaken before planning permission could be granted, I am not aware of any infrastructure or technical constraints which would preclude houses being built within the area suggested. Being so close to the village centre, the site would afford good accessibility to its services and facilities, and the application of Policy 18 would ensure that 25% of the houses on this greenfield site would be for</p>

	affordable housing. The site is being proposed by a major house-building company and, given that this is an area of strong market demand, I am satisfied that this site is capable of becoming effective, with new house completions being delivered within the period of this plan. However I have not identified particular benefits which would arise from its development that might outweigh the adverse environmental effects which could occur, even if a robust woodland management plan is implemented. Given my finding at Issue 5 that there is not a requirement for additional sites for housing development to be released in the Kilmacolm and Quarriers Village area of Inverclyde, I conclude that the plan should not be amended in order to allocate this site for that purpose.
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Green Belt boundary issues

Robustness of existing boundary	Bounded to the east and north by former railway line (now NCR75) and Lochwinnoch Road respectively. Bounded to the west by established property boundaries.
Robustness of proposed boundary	Southern boundary would be formed by the River Gryffe and a wooded area.

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Small area of medium/high fluvial flood risk and a surface water flood hazard identified. It is noted that the submitted Flood Risk Assessment indicates that these issues can be fully addressed. Known hydraulic constraints within the waste water network.
Biodiversity	11	<p>Development likely to have significant adverse effects on the western part of Duchal Estate LNCS and Milton Wood, which overlap with the eastern part of the proposed developable area. It is noted that the submitted Preliminary Woodland Management Plan states that development adjacent to and within the eastern margins of the LNCS would result in the loss of approximately 1.48ha from Milton Woods. It further noted that development of the Green Belt Zone would result in the loss of two individually surveyed trees and woodland edge.</p> <p>While the proposal includes the retention of category A and B trees, along with mitigation and enhancement measures such as compensatory planting and delivery of a Woodland Management Plan, it is considered that these do not balance the significant loss of existing native woodland.</p>
Climatic Factors	7, 5	Car travel and associated emissions would be minimized as site within 400m of bus stop with at least 1 bus per hour between 7am and 7pm on weekdays
Air	13	Short term impacts during the construction phase, but unlikely to lead to the designation of an AQMA
Soil	13,4	No carbon rich soils or priority peatland within site. Development of greenfield land.

Landscape	11	While it is noted that development would be restricted to the eastern part of the site, it is considered that this would still have significant adverse effects on the 'green wedge' character of Kilmacolm. It would also result in some loss of the historic woodland character of this part of Milton Woods and Kilmacolm. While mitigation is proposed in the submission, it is considered that these measures would not significantly reduce the adverse effects.
Material Assets	4	Development of greenfield land
Cultural Heritage	10	While it is noted that the submitted Heritage Appraisal states that development will not have an adverse impact on the Duchal House designed landscape, Historic Environment Scotland have advised that "development of housing within (this site) would give rise to significant adverse impacts on the Inventory Designed Landscape and its setting".
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. As the site is adjacent to existing playing fields, design proposals should ensure that access and amenity for pitch users is not adversely effected. Opportunities to link with adjacent active travel network. Site within accessible distance of local services – 35m.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	No
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Kilmacolm/Quarrier's Village LNCS Assessment Summary (2017)

Police Station Field survey site supports a substantial area of well-developed woodland. It is suggested this remains part of the existing Duchal Wood LNCS.
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Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	Access from Lochwinnoch Road. Suitable visibility should be provided from access. Parking should be provided in accordance with approved parking standard. Development should include measures to reduce vehicle speeds within the site. Street lighting to be provided throughout site.
Would the proposal require additional utilities infrastructure (e.g. water and	Scottish Water confirm that there is sufficient water and waste treatment work capacity to service proposed demands, but further investigations may be required to determine impacts on network capacities.

sewerage, gas, electricity, telecommunications)	No comments received from other utility providers.
Does the proposal raise any educational capacity issues?	Depending on the scale of land identified for housing in the Kilmacolm Primary School catchment, there could be potential capacity issues.

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	Yes – CALA Homes (West) Ltd
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Kilmacolm as a strong market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	It is expected that the site could deliver some housing by 2024 and remainder by 2032.

Key Agency Comments

HES	<p>We note that this potential allocation surrounds the northern part of Duchal House Inventory Designed Landscape (GDL146). Duchal House is included on the Inventory in recognition of its national importance as a fine example of a formal late 17th/early 18th century designed landscape to which later overlays have been well integrated. It consists of a Category A-listed classical house surrounded by formal gardens and a canalised burn, together with high quality estate buildings and formal avenues, parkland and woodland. It has outstanding historical and architectural value, high value as a work of art as well as high horticultural, arboriculture and silvicultural and scenic vale. CFS06 incorporates part of the northern extremity of the designed landscape which is composed of the late 19th century North Lodge and former entrance driveway linking the village of Kilmacolm with the house. It dates from the later 19th century northward expansion of the designed landscape, when the Shaw-Stewart family acquired the estate and used the house for shooting parties. They extended the policies NE towards Kilmacolm after 1863, creating an entrance from the town (and new railway station) with a long picturesque drive. This is an important element of the designed landscape, which has high historic importance as the link between the estate and the village, as well as significant scenic importance as a green wedge of woodland, which we would wish to see protected and conserved.</p> <p>It is our view that the development of housing within site CFS06 would give rise to significant adverse impacts on the Inventory Designed Landscape and its setting. We therefore do not support the inclusion of this site within the Inverclyde Local Development Plan 3.</p>
NatureScot	Development here would have significant and adverse impacts on local landscape character and on the landscape setting of the existing village. A large part of the site overlaps with a SINC and Duchal House Gardens and Designed Landscapes designations. Additionally, a large part of the site is covered by semi-natural woodland.
Scottish Forestry	NWSS Dominant Habitat lowland mixed deciduous woodland with 100% Canopy cover. High rated Herbivore impact in the Milton Wood classed as nearly native woodland at 55%. A 100% native 52approx.52 runs on the NE of the site

SEPA	<p>Flood risk – Part of this site lies within the 1 in 200 year floodplain. No development should take place within this area. Flood Risk Assessment required. A surface water flood hazard has been identified and should be discussed with FRMA and Scottish Water. Appropriate surface water management measures should be adopted.</p> <p>Water – No comment</p>
Scottish Water	<p>There is sufficient water and waste water treatment works capacity to service proposed demands.</p> <p>Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any, this development has on the existing water treatment network. As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>There is a 450 mm combined foul drainage pipe within the boundary of the site - please see Scottish Water advice infrastructure conflicts.</p> <p>Near-by watercourse should support a surface water solution - please see Scottish Water advice and policy on Surface Water.</p>
Sportscotland	We request that acknowledgement is made to the existence of playing fields adjacent to these sites, and that any design proposals should take this into account to ensure protected access and amenity for existing pitch users.
SPT	Public transport accessibility information provided under 'Climatic Factors' in the Sustainability Assessment
Transport Scotland	No comment

Other comments received to MIR consultation

<p>In addition to any representations received from the site promoter or key agencies (see above):</p> <ul style="list-style-type: none"> • 1 representation objected to the proposal – no specific reason given • 1 representation said the proposed site should be designated as a long stay car park

Summary and conclusion

<p>The Police Station Field site is not known to have any significant technical constraints which would impact deliverability. Identified flood risk and potential water and waste water network issues can be addressed at the planning application stage.</p> <p>Development is likely to have significant adverse effects on a Local Nature Conservation Site, native woodland, and the Duchal House Garden and Designed Landscape, which are located within the site boundary. Development would also have adverse effects on landscape character and setting, particularly in relation to the characteristic green wedge extending the countryside into the heart of Kilmacolm. The site is also a locally important recreational resource for walking, cycling etc. While development of the southern part of the site would extend the settlement southwards to the banks of the River Gryffe, the river would contain further southwards expansion.</p>

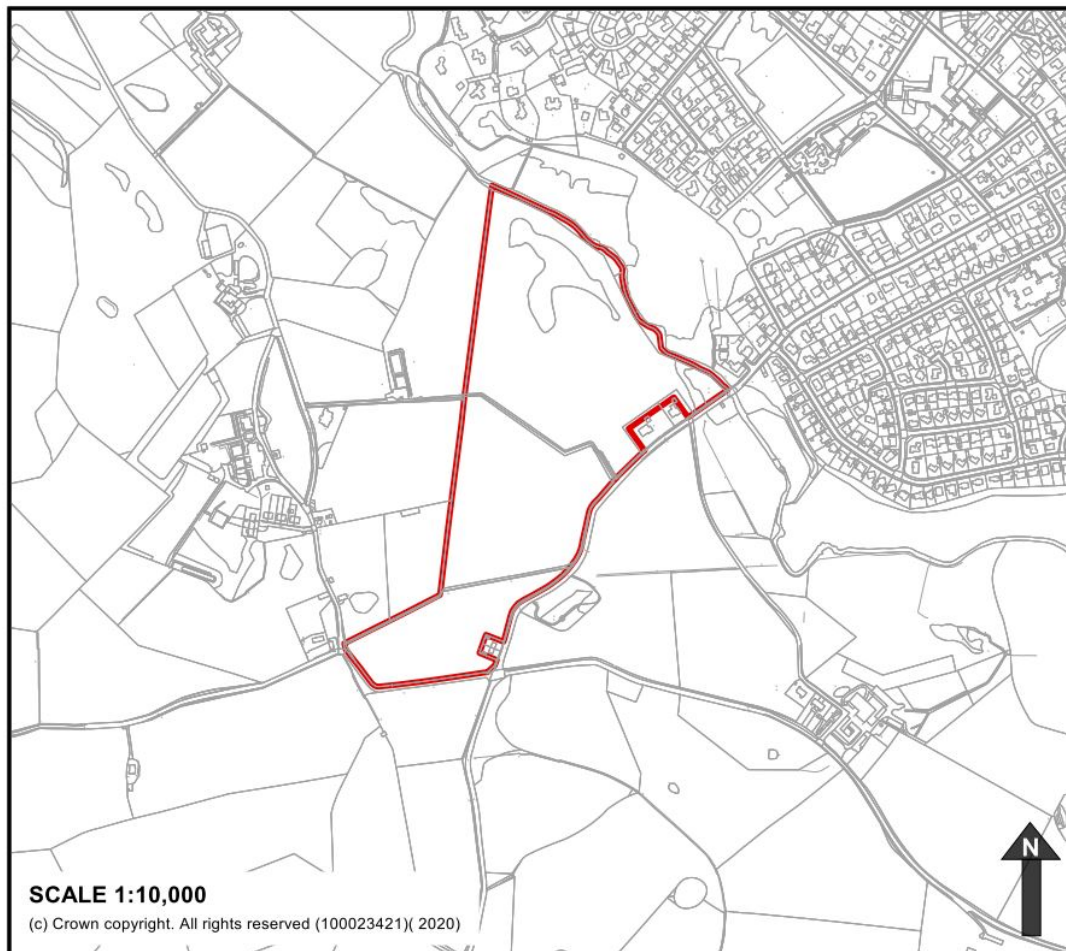
The site is within an accessible distance of a regular public transport service and everyday services in Kilmacolm. It is also adjacent to the Core Path Network.

The site is in a marketable area, an identified developer has expressed interest in the proposal, and housing could be delivered in the period to 2024.

With regard to the above and the findings of the Housing Land Technical Report 2021, it is not considered appropriate or necessary to allocate this site for housing development in the Proposed Local Development Plan.

Site Details

Site name	Lochwinnoch Road
Settlement	Kilmacolm
Call for Sites reference	CFS07
Site size (ha)	16.53
Current use	Agriculture
Existing LDP designation	Green Belt



Proposal

Submitted by	CALA Homes (West) Scotland Ltd
Proposed Use	Residential
Number of houses/floorspace	100 houses on land to the north of the site (Call for Sites submission)
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response.	<p>Development will incorporate a range of house types, including the provision of affordable homes. There are no known issues that will prevent utility connections to the site. The site is effective and development can be delivered in the period up to 2029. There are no planning or environmental reasons why Lochwinnoch Road should not be allocated for housing in the emerging LDP 3.</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> • MIR representation • Response to Inverclyde Council Local Development Plan Proposed Plan 2018 <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p><i>Flood Risk</i> – A future planning application will be supported by a Flood Risk Assessment and a Drainage Strategy, which will include the provision of a SuDS Strategy.</p> <p><i>Biodiversity</i> – Any future development proposal will ensure that the integrity of the LNCS is maintained through the implementation of appropriate mitigation measures. An Ecological Assessment will be prepared at the appropriate time.</p> <p><i>Landscape/Green Belt</i> – Development of the northern part of the site only will minimise the impact on the surrounding landscape setting. Development of this area presents opportunities to:</p> <ul style="list-style-type: none"> • consolidate and integrate the recently completed and isolated redevelopment to the south of Pacemuir Bridge within a well-designed larger residential development of an appropriate scale in the context of the wider landscape. • augment the existing woodland, shelterbelt and hedgerow structure to the south of Kilmacolm which in turn would form new green links and enhance the ecological value of the site. • establish a new broad defensible green edge to Kilmacolm, where it has been breached by the Pacemuir development, which would be in keeping with the wider vegetation pattern whilst screening it in views from the surrounding rural farmsteads and war memorial. <p>This will provide an attractive landscape setting, whilst reducing the impact of the proposal on the surrounding landscape. The development of the site, therefore, presents the opportunity to create a pleasant and welcoming gateway into Kilmacolm.</p> <p><i>Greenfield</i> – While the proposal will result in the loss of a small area of greenfield land, development of the site will include provision of open space to mitigate the loss.</p>

Planning History

Planning Applications	No recent applications
Previous Plan – Reporters Comments	<p>This large greenfield site lies on the western side of Kilmacolm. It is on the northwest side of Lochwinnoch Road, and south-west of the Gryfe Water. It forms part of the open countryside immediately beyond the edge of the built-up area of Kilmacolm which, here, is marked by the bridge which carries Lochwinnoch Road across the Gryfe Water. The site boundary extends as far as the B788 Greenock to Bridge of Weir road, and it comprises open fields on rising land. I find that this site comprises part of the rural area which provides an attractive setting for the village of Kilmacolm. The representation suggests that development within the site would be restricted to the lower part which is close the Gryfe Water. Tree planting on the southern edge of the development would be undertaken to create a clear edge to the extended settlement. However I consider that the Gryfe Water already provides a clear and robust boundary to the settlement. While the agricultural fields do not in themselves have a high ecological value, part of the development site is now included within a local nature conservation site which straddles the river. This is likely to restrict the area that is suitable for development, but there may also be an indirect impact as a result of houses being occupied in close proximity to such a site. The council's assessment has highlighted that a flood risk assessment would be required, and the feasibility of securing a sewer connection would also need to be confirmed before the development could be designed and any planning permission granted. I am not aware of other technical or infrastructure issues which might preclude its development. With interest in this site from a major house-builder, I consider that it is capable of becoming effective, as it is likely that house completions could be delivered before the end of the plan period in 2029. However, in the present circumstances where I have found that it is not necessary to augment the housing land supply in the Kilmacolm and Quarriers Village area, I conclude that it would not be appropriate to amend this plan to allocate this greenfield site for housing development.</p>

Green Belt boundary issues

Robustness of existing boundary	The site is separate from the existing settlement boundary.
Robustness of proposed boundary	The boundary of the submitted site would be contained to the south and east by roads. Its northern boundary would be the River Gryffe, with an area of green belt between it and the existing settlement. The western boundary is currently field boundaries.

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Area of medium/high fluvial flood risk within the site and surface water flood hazard identified. Potential adverse effects on the River Gryffe and areas of wetland habitat. Known hydraulic constraints within the waste water network.

Biodiversity	11	The Mill Dam Local Nature Conservation site is adjacent to the northern boundary of the developable area, with a small area of the LNCS within the developable area. Impact on protected species not known.
Climatic Factors	7, 5	Likely to increase car travel and associated emissions as site not accessible to public transport provision.
Air	13	Short term impacts during the construction phase, but unlikely to lead to the designation of an AQMA
Soil	13,4	No carbon rich soils or priority peatland within site. Development of greenfield land
Landscape	11	While noting that only the northern part of the site is proposed for development, this area remains largely detached from the existing settlement, both physically and visually. Development of this site would represent southward expansion of Kilmacolm, which could set a precedent for further development. Likely to have significant impacts on local landscape character and on the landscape setting.
Material Assets	4	While noting that open space will be provided, it is not considered that this would mitigate the loss of greenfield land.
Cultural Heritage	10	Site is in vicinity of the Duchal House Inventory Designed Landscape.
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. Opportunities to link with adjacent active travel network. Site not within an accessible distance of local services – 1060m.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	No
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Kilmacolm/Quarrier's Village LNCS Assessment Summary (2017)

<p>ARP field (Lochwinnoch Road) is largely intensively managed grassland with very little botanical or habitat interest, although there could be potential for farmland birds with more sympathetic management. However the small section in the north supports some wetland interest and a few areas of less improved grassland, which given its proximity to the Gryfe Water (and adjacent LNCS at Mill Dam), provide a strong case for inclusion as part of a Gryfe Water corridor site, or perhaps as part of a broader Mill Dam LNCS. It would also make sense to extend this to the south and include the area adjacent to the Gryfe that is within the 009 Police Station Field survey area. Some of the less diverse pasture away from the immediate Gryfe corridor and similar pasture to the east of the woodland, except for the high ridge grazed birch woodland and adjacent relatively unimproved grassland in the centre of this strip are of low nature conservation interest.</p>
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Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	Access Onto Lochwinnoch Road. Suitable visibility should be provided from access. Extend 30mph speed limit. Possible new roundabout junction on Lochwinnoch road. Requires footway, street lighting and 30mph speed limit to be extended southward beyond the access point. Parking should be provided in accordance with approved parking standard. Development should include measures to reduce vehicle speeds within the site.
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	Scottish Water confirm that there is sufficient water and waste treatment work capacity to service proposed demands, but further investigations may be required to determine impacts on network capacities. No comments received from other utility providers.
Does the proposal raise any educational capacity issues?	Depending on the scale of land identified for housing in the Kilmacolm Primary School catchment, there could be potential capacity issues.

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	Yes – CALA Homes (West) Ltd
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Kilmacolm as a strong market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	It is expected that the site could deliver some housing by 2024 and remainder by 2032.

Key Agency Comments

HES	This site is identified as an alternative option for the development of housing. It is located in the vicinity of the Duchal House Inventory Designed Landscape (GDL146). We would expect that any development in this location is carefully designed to take into account impacts on the setting of the Inventory Designed Landscape.
NatureScot	This is a large and prominent site, which defines the southern landscape setting and contributes to the characteristic gateway and approach to Kilmacolm from the south. The site is visually open and would represent a substantial southward expansion of Kilmacolm. Development would have significant and adverse impacts on local landscape character and on the landscape setting of the existing settlement. The north east of the site lies adjacent to a SINC.
Scottish Forestry	No comment

SEPA	<p>Flooding – Part of this site lies within the 1 in 200 year floodplain. No development should take place within this area. Minor watercourse flow along or in proximity to site boundary. Flood Risk Assessment required. A surface water flood hazard has been identified and should be discussed with FRMA and Scottish Water. Appropriate surface water management measures should be adopted.</p> <p>Water environment – Possible increased pressure on D/S sewer catchment. The development should be set back from the Gryfe, at least 10m buffer zone. Within the development area there are areas of wetland that should be subject to EIA and retained if possible to enhance local biodiversity</p>
Scottish Water	<p>There is sufficient water and waste water treatment works capacity to service proposed demands.</p> <p>Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any, this development has on the existing water treatment network.</p> <p>As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>There is a near-by watercourse which should support a surface water solution - please see Scottish Water advice and policy on Surface Water.</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under 'Climatic Factors' in Sustainability Assessment
Transport Scotland	No comment

Other comments received to MIR consultation

<p>In addition to any representations received from the site promoter or key agencies (see above):</p> <ul style="list-style-type: none"> • 2 representations objected to the proposal on the basis that the site should be retained as Green Belt

Summary and conclusion

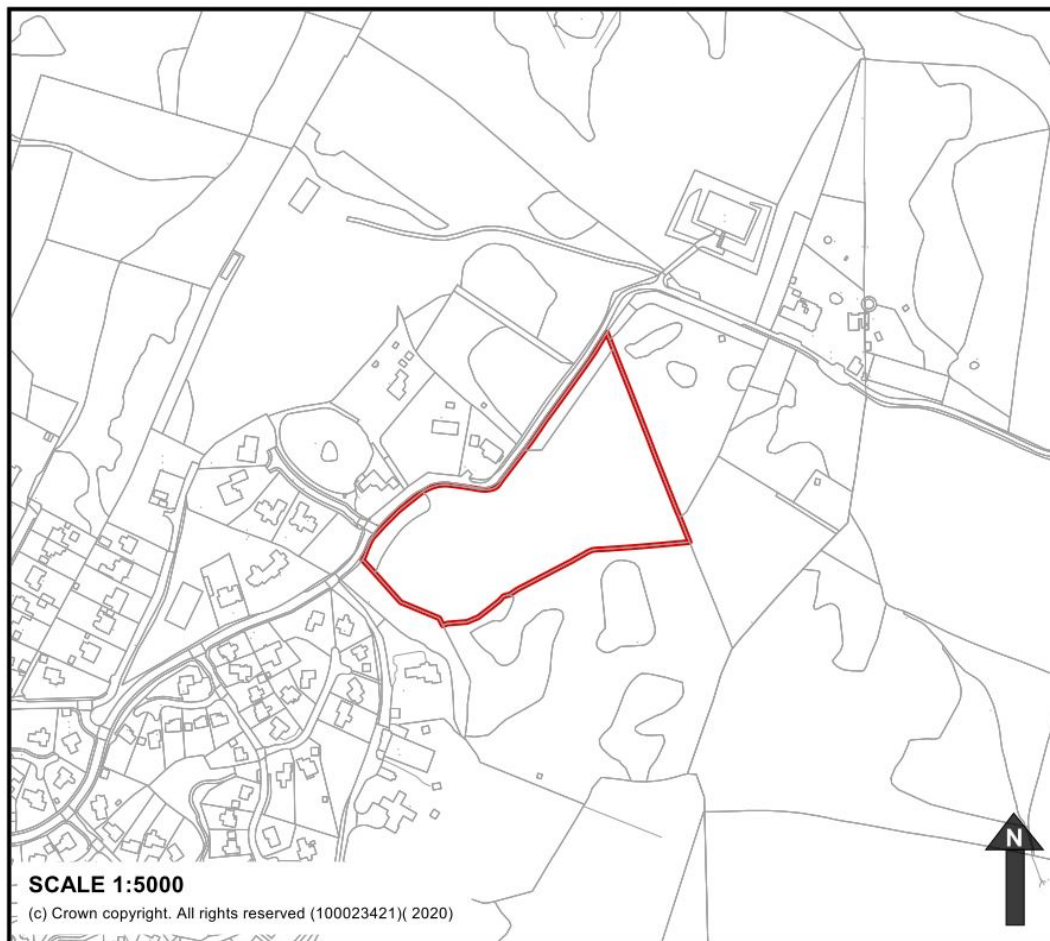
<p>The Lochwinnoch Road site is not known to have any significant technical constraints which would impact deliverability. Identified flood risk and potential water and waste water network issues can be addressed at the planning application stage.</p> <p>The northern part of the proposed site is overlapped by a LNCS, with a small area of the latter within the proposed developable area. The site is poorly connected to the village in urban form terms and would have an adverse impact on the character and setting of the village by extending development beyond the River Gryffe. It is not within an accessible distance of public transport services or local services in Kilmacolm, but is adjacent to the Core Path Network.</p>
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The site is in a marketable area, an identified developer has expressed interest in the proposal, and it is considered that housing could be delivered in the period to 2024 and beyond.

With regard to the above and the findings of the Housing Land Technical Report 2021, it is not considered appropriate or necessary to allocate this site for housing development in the Proposed Local Development Plan.

Site Details

Site name	Overton, West Glen Road
Settlement	Kilmacolm
Call for Sites reference	CFS08
Site size (ha)	2.38
Current use	Agriculture
Existing LDP designation	Green Belt



Proposal

Submitted by	Named individual
Proposed Use	Residential
Number of houses/floorspace	5-10 houses
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response.	<p>Proposal for maximum of 10 passive homes which will create more energy than they use by combining renewable technologies, including micro hydro and solar. Inverclyde Council should include the West Glen Road as a “homes for the future” site because it will support the Scottish Government’s vision and allow the Council to be at the forefront of the Zero Carbon homes industry in Scotland and beyond. The proposal will maximise outside space and create new planting, landscaping and enhancing the biodiversity of the area. Landscaping will be designed to maximise habitat creation. The site has good access to public transport and local services, with all utility connections in close proximity of the site. Several developers have contacted the owner over the years, including national housebuilders, retirement home developers and regional developers.</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> • Additional information - West Glen Rd site <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p><i>Biodiversity</i> – Plans would be put in place to maintain and enhance the Glen Moss SSSI</p>

Planning History

Planning Applications	No recent applications
Previous Plan – Reporters Comments	<p>(Comments below relate to a larger site submitted for inclusion in LDP2).</p> <p>This is a large greenfield site adjoining the upper, north-west edge of Kilmacolm. It lies on the south-east side of West Glen Road. The site extends beyond the limit of existing residential development on the opposite side of the road. It is partly screened by two linear tree belts alongside the road, but comprises open fields which form part of the rural setting of the village. The existing settlement boundary here is not inappropriate or weak. While the Glen Moss site of special scientific interest lies close by, to the south, the site is not in itself of high ecological value. However its development would represent a significant extension of the village into an area of countryside that contributes positively to Kilmacolm’s setting. Areas of potential flooding would require to be addressed, but there appear to be no infrastructure or technical constraints that would preclude its development. It is some 750 metres from the centre of Kilmacolm, although roadside footways along West Glen Road do not extend all the way to the site and it is not served by public transport. With these caveats, there would be good access to the facilities and amenities of the village. The application of Policy 18 would ensure that 25% of the houses that are built here would be for affordable housing, although the representation indicates that 30% would be made</p>

	available for that purpose, together with attractive landscaping and public open space. However, I have not identified any other significant benefits which would arise from developing this greenfield site. In the current circumstances, where I have found that the release of additional housing land in the Kilmacolm and Quarriers Village part of Inverclyde is not required, I conclude that an amendment to the plan in order to allocate this site for housing development would not be justified.
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Green Belt boundary issues

Robustness of existing boundary	The northern boundary of the village is formed by a road, although there are houses to the north of it in the green belt. To the other side of West Glen Road, the village boundary extends further north than the proposed site.
Robustness of proposed boundary	The proposed site boundaries are currently formed by field boundaries.

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Potential flood risk from minor watercourse (possibly culverted) adjacent to site boundary and surface water flood hazard identified. Known hydraulic constraints within the waste water network.
Biodiversity	11	No environmental designations within the site, but the Glen Moss SSSI is in close proximity to the southern boundary. Impact on protected species unknown. There may be opportunities for enhancements to the SSSI.
Climatic Factors	7, 5	Likely to increase car travel and associated emissions as site not accessible to public transport provision.
Air	13	Short term impacts during the construction phase, but unlikely to lead to the designation of an AQMA
Soil	13,4	No carbon rich soils or priority peatland within site. Development of greenfield land (approx. 90% of site)
Landscape	11	Potential for adverse effects as site acts as a gateway to Kilmacolm from the north-east.
Material Assets	4	Development of greenfield land (approx. 90% of site)
Cultural Heritage	10	Not in close proximity to any designated cultural heritage assets
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. Site is 270m from active travel network and within an accessible distance of local services – 750m.

SPP Sustainability Principle	Criteria	Summary comments
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1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	No
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Kilmacolm/Quarrier's Village LNCS Assessment Summary (2017)

West Glen has large areas of low diversity pasture but there is a cluster of habitats in the southern portion which help to increase the overall species diversity and the proximity to Glen Moss enhances the site's potential, but again sympathetic management is needed. However it is hard to justify any designation given its current condition, but any development here should try to retain and enhance the interest of the southern section. The southern section could perhaps become an extension of the existing Overton Grassland LNCS (although divided by an area of woodland). There is some conservation value in its proximity to Glen Moss SSSI and this should be acknowledged. However this site has not been proposed as an LNCS.

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	Main access from West Glen Road. Suitable visibility should be provided from access. Requires lighting and 30mph speed limit to be extended northward beyond the access point. Parking should be provided in accordance with approved parking standard. Development should include measures to reduce vehicle speeds within the site. Street lighting to be provided throughout site.
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	Scottish Water confirm that there is sufficient water and waste treatment work capacity to service proposed demands, but further investigations may be required to determine impacts on network capacities. No comments received from other utility providers.
Does the proposal raise any educational capacity issues?	Depending on the scale of land identified for housing in the Kilmacolm Primary School catchment, there could be potential capacity issues.

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	Submission indicates several unnamed developers have approached the owner
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Kilmacolm as a strong market area (2016).

If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	The scale of development suggested could be delivered by 2024, although it is noted there is no specific developer attached to the site.
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Key Agency Comments

HES	No comment
NatureScot	This site acts as a gateway to Kilmacolm from the north-east. Development proposals should provide suitable settlement edging to enhance gateway as well as an appropriate landscape framework. They would also need to ensure there were no adverse impacts on Glen Moss SSSI including hydrological and drainage prior to development. Particularly as the site is notified for its Basin Fen wetland feature and also Dragonfly Assemblage which is dependent on the wetland feature. However, we note the intention to maintain and enhance the biodiversity in the area which is welcomed. Could enhance access to SSSI
Scottish Forestry	No comment
SEPA	<p>Flood risk – A minor watercourse with potentially culverted sections flows along or adjacent to the site boundary which could represent a potential flood risk. A basic FRA, consisting of topographic information in the first instance and a detailed layout plan will be required. A surface water flood hazard has been identified and should be discussed with FRMA and Scottish Water. Appropriate surface water management measures should be adopted. Potential residual flood risk in the event of ponded water infrastructure failure.</p> <p>Water environment – No comment</p>
Scottish Water	<p>There is sufficient water and waste water treatment works capacity to service proposed demands.</p> <p>Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any this development has on the existing water treatment network.</p> <p>As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>There is a 300 mm and 400mm Trunk Mains Distribution pipe within the boundary of this site - please see Scottish Water advice infrastructure conflicts.</p> <p>Near-by watercourse which should support a surface water solution - please see Scottish Water advice and policy on Surface Water.</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under 'Climatic factors' topic in the sustainability assessment.
Transport Scotland	No comment

Other comments received to MIR consultation

In addition to any representations received from the site promoter or key agencies (see above):

- 2 representations objected to the proposal on the basis that the site should be retained as Green Belt

Summary and conclusion

The Overton Road site is not known to have any significant technical constraints which would impact deliverability. Identified flood risk and potential water and waste water network issues can be addressed at the planning application stage.

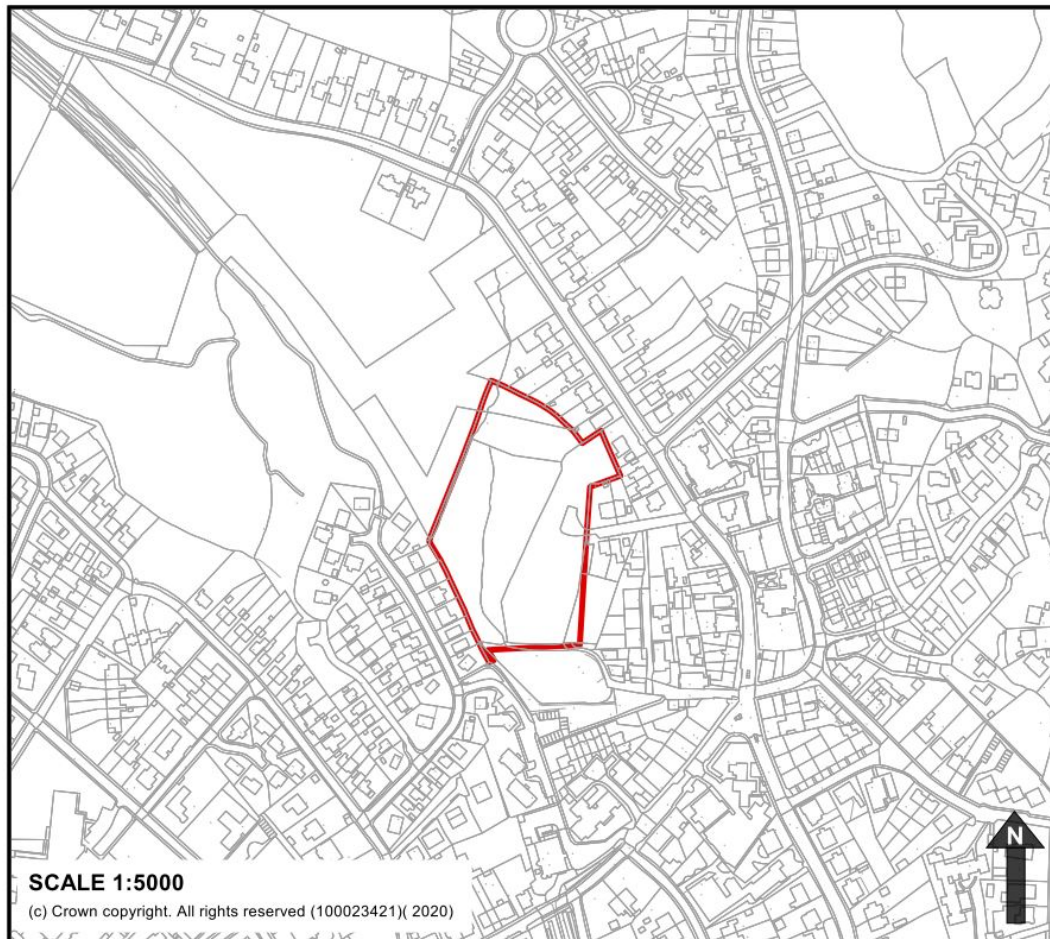
The site is not covered by any environmental designations, but potential impacts on a nearby SSSI would need to be assessed. Development would have adverse effects on the northern approach to the settlement, extend the built-up area northwards, and could lead to additional development pressure in the green belt if a robust green belt boundary was not created. The site is not within an accessible distance of public transport services, but is reasonably close to the Core Path Network and accessible to local services

Site is in a marketable area, there is unnamed developer interest in the proposal, and it is considered that development of this scale could be developed within the Plan period.

With regard to the above and the findings of the Housing Land Technical Report 2021, it is not considered appropriate or necessary to allocate this site for housing development in the Proposed Local Development Plan.

Site Details

Site name	Smithy Brae
Settlement	Kilmacolm
Call for Sites reference	CFS09
Site size (ha)	1.91
Current use	Rough ground
Existing LDP designation	Part within settlement boundary/part Green Belt



Proposal (is for the extension of a site previously identified for housing development)

Submitted by	Kilmacolm Estates Ltd
Proposed Use	Residential
Number of houses/floorspace	TBC
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p>Development of this site for housing will assist the Council in ensuring that a suitable supply of land for new housing is provided within Kilmacolm. The site is within a short walk of local services and public transport provision, with all utility connections either already present on site or within adjacent land. There are no known constraints affecting development. Whilst informal discussions are ongoing with a number of potential developers, no developer has as yet been contracted to take forward the development of the site. If allocated, development will likely be delivered in the period to 2024 or 2029</p> <p><u>Supporting Document</u></p> <ul style="list-style-type: none"> • MIR Representation <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p><i>Flood Risk</i> – SEPA Flood Map shows only a small section of the site, at its extreme south western corner, is subject to any flood risk (pluvial). Development will include installation of a positive surface water drainage system which will address any existing surface water drainage issues.</p> <p><i>Biodiversity</i> – The area of woodland referenced in the SEA is not of any particular biodiversity value due to the very limited extent of tree cover, which effectively comprises a single row of trees running along the line of historic field boundaries. In the case of the woodland at the southern boundary of the site, these trees are relatively recently planted.</p> <p><i>Contamination</i> – Majority of the site has never been developed and is therefore unlikely to be subject to any form of potential contamination. While there is known to be some localised contamination on a small part of the site, the nature of this contamination has been previously assessed and can be addressed by standard industry engineering processes.</p> <p><i>Landscape</i> - development of this site does not give rise to any wider landscape impacts. In line with the existing allocation, which relates to the southern section of the site, it will be possible to develop this wider land take in a manner which incorporates a “green wedge” which will link the wider countryside into the centre of the village. In topographical terms, the site is relatively low lying when compared to the adjacent land, which will assist in allowing any development to assimilate itself into the surrounding landscape. The provision of suitable landscaping will further assist in the integration of the development into the surrounding area.</p>

	<p><i>Green Belt boundary</i> – It is considered that in conjunction with the Council it will be possible to create a robust and defensible green belt boundary.</p> <p><i>Ownership</i> – The land is controlled by the promoters of the site (who it is worth noting are well established developers in their own right) and is held under a long term option agreements. This arrangement allows for the site to be brought forward for development at the earliest possible opportunity.</p>
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Planning History

Planning Application History	No recent applications
Previous Plan – Reporters Comments	This site (ref. R65) is identified in the plan as a housing development opportunity site with an indicative capacity of 42 houses. It lies on the north side of the village centre, and comprises both a brownfield site which has become overgrown, and an element of greenfield land which was previously removed from the green belt. It has previously been granted planning permission for new housing. It is also already identified as a housing development opportunity site in the existing local development plan, following detailed consideration through the examination of that plan. The housing land audit also reflects the council's view that housing completions will be delivered on this site before the end of the plan period. This plan gives strong preference to the re-development of brownfield sites within settlement boundaries. In this case, any housing development would also bring the added benefit of securing the remediation of currently contaminated land. No significant change in circumstances relating to this site has been drawn to my attention which would justify removing it from this plan.

Green Belt boundary issues

Robustness of existing boundary	The current boundary follows an irregular shape and does not relate to features on the ground.
Robustness of proposed boundary	To be formed by the straight line of a small watercourse, but a more robust boundary would have to be created.

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	<p>Potential flood risk from watercourse along site boundary and surface water flood hazard identified on small part of site, but SEPA advise a Flood Risk Assessment is not required. Known hydraulic constraints within the waste water network.</p> <p>Opportunity for water environment enhancements through meandering and other morphological improvements to the adjacent watercourse</p>

Biodiversity	11	No environmental designations within or in close proximity to site. While the site promoter has identified mixed broadleaved trees along the southern and north western boundaries as having very limited value, this requires to be assessed through a Tree Survey. Impact on protected species not known.
Climatic Factors	7, 5	Within 400m of a bus stop within 400m of bus stop with at least 1 bus per hour between 7am and 7pm on weekdays
Air	13	Short term impact during construction phase, but unlikely to lead to designation of an AQMA
Soil	13,4	No carbon rich soils or priority peatland within site. Development of greenfield land.
Landscape	11	The proposed site is located on one of Kilmacolm's 'green wedges', which is a key characteristic of the local landscape. While development would reduce the size of the green wedge, it is considered that any potential adverse effects could be mitigated through appropriate siting and design.
Material Assets	4	Greenfield development
Cultural Heritage	10	In close proximity to 'The Cross, Kilmacolm' Conservation Area, but development unlikely to have any significant effects
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. Opportunities to link with adjacent core path network. Site within an accessible distance of local services – 118m.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Kilmacolm/Quarrier's Village LNCS Assessment Summary (2017)

Site not included for assessment

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	No comments received from Roads and Transportation Service.

Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	<p>Scottish Water confirm that there is sufficient water and waste treatment work capacity to service proposed demands, but further investigations may be required to determine impacts on network capacities.</p> <p>No comments received from other utility providers.</p>
Does the proposal raise any educational capacity issues?	Depending on the scale of land identified for housing in the Kilmacolm Primary School catchment, there could be potential capacity issues.

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	No
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Kilmacolm as a strong market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	It is expected that the site could deliver some housing by 2024 and remainder by 2032.

Key Agency Comments

HES	No comment
NatureScot	This site appears to be a sloping, predominantly greenfield site located within Kilmacolm. Careful consideration of design, siting and layout will be required to ensure that development proposals are sensitive to the landscape character and setting and to ensure coherence with existing development. It is relatively well concealed from Port Glasgow Road (A761), however, the existing landscape framework of woodland should be retained and enhanced. There are opportunities to provide link to the existing Core Paths to encourage active travel. There is an area of semi-natural woodland in the north of the site which should be incorporated into the design of any development proposal. This could be incorporated into green infrastructure elements on the site, contributing to the wider green network.
Scottish Forestry	Small amount of mixed broad leaves found bordering the field.
SEPA	<p>Flood risk – A minor watercourse flows along the site boundary which could represent a potential flood risk. A basic FRA, consisting of topographic information in the first instance and a detailed layout plan will be required. A surface water flood hazard has been identified and should be discussed with FRMA and Scottish Water. Appropriate surface water management measures should be adopted.</p> <p>Water environment – The minor water is straight along the site boundary. Opportunity to meander and make other morphological improvements integrated into the well-being of the development.</p>
Scottish Water	There is sufficient water and waste water treatment works capacity to service proposed demands.

	<p>Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any this development has on the existing water treatment network.</p> <p>As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>There is a 400 mm Trunk Mains Distribution pipe and a 450mm Combined foul pipe within the boundary of the site – please see Scottish Water advice on infrastructure conflicts.</p> <p>Near-by watercourse should support a surface water solution - please see Scottish Water advice and policy on Surface Water.</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under ‘Climatic factors’ topic in the sustainability assessment.
Transport Scotland	No comment

Other comments received to MIR consultation

In addition to any representations received from the site promoter or key agencies (see above):

- 1 representation objected to the proposal
- 2 representations supported the proposal

Summary and conclusion

The Smithy Bare site is not known to have any significant technical constraints which would impact deliverability, although suitable Roads access would have to be confirmed. Potential water and waste water network issues can be addressed at the planning application stage.

There are no environmental designations covering the site, but the value and condition of trees within the site boundaries requires to be established by a Tree Survey. While the proposed site is located on one of Kilmacolm’s characteristic ‘green wedges’, any potential adverse effects could be mitigated through appropriate siting and design. The site has, in part, already been identified for housing development in previous development plans and the current proposal would represent a more logical settlement boundary, following the line of a water course. The site is within an accessible distance of a regular public transport service and everyday services in Kilmacolm, as well as being close to the Core Path Network.

While the site is in a marketable area, there may be deliverability issues as the site is under different ownerships and has no recognised builder attached. The identification of the larger site has been identified by the promoter as a solution to this issue.

With regard to the above and the findings of the Housing Land Technical Report 2021, it is considered that the larger Smithy Brae site should be allocated for housing development in the Proposed Local Development Plan.

Site Details

Site name	Port Glasgow Road (1)
Settlement	Kilmacolm
Call for Sites reference	CFS10
Site size (ha)	0.42
Current use	Agriculture
Existing LDP designation	Green Belt



Proposal

Submitted by	Gryffe Developments Ltd
Proposed Use	Residential
Number of houses/floorspace	6 houses
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p>The proposal would help meet the increasing and necessary housing needs of Kilmacolm and the identified housing shortfall. The site offers immediate access to the public transport system, close proximity (within 400m, 10 – 15 minutes' comfortable walking distance) to the existing village centre, schools, health, religious and community facilities and lies in a commercially attractive part of Kilmacolm. All utility services are immediately available on Port Glasgow Road or running through the centre of the site, and there is capacity. There has been strong interest in developing the site from a variety of developers and there are no known constraints affecting delivery.</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> • Arguments in favour of the allocation of Port Glasgow Road, Kilmacolm • MIR Response <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p><i>Flood Risk</i> –The small burn through the site can be easily managed by culverting, as Scottish Water has done nearby and as is normally carried out elsewhere. It is not a barrier to development.</p> <p><u>Landscape/Green Belt</u> –The Scottish Water access road between the houses has removed the possible 'greenfield' impression. It also serves to emphasise the odd break in the continuous housing line along the main Port Glasgow Road. There is no coalescence in this situation. Development of the site would strengthen the greenbelt by completing the pattern of development along Port Glasgow Road and correct the anomalous break in the urban form. The rear boundaries of the potential houses would not be a physical barrier to the Green Belt as there are already many houses to either side of this plot and this is a common feature throughout Kilmacolm.</p> <p><u>Deliverability</u>: - The site is deliverable – with all utility and services, there is no contamination, a developer is interested in the site, the owners are in agreement, and there is demand in this area.</p> <p><u>Ribbon Development</u> – Development of this site is not ribbon development. The site is merely an odd gap between existing housing. Along the rest of Port Glasgow Road to both the east and the west of this site there are 11 other houses with their rear boundaries onto the Green Belt. Furthermore another 10 houses on the opposite side of Port Glasgow were built as single properties with green fields behind their gardens. None of these have detracted from the character of the built environment, nor the perceived 'entry' into the village from the north-west.</p>

Planning History

Planning Applications	No recent applications
Previous Plan – Reporters Comments	A separate representation relating to this small greenfield site has been dealt with by the council at Issue 4, and my conclusions can be found there. I found that the site should not be excluded from the green belt and, accordingly, that no amendment to the plan was required. The additional arguments raised by the representation here relate principally to need and deliverability. I find that there are no physical or infrastructure constraints which would preclude the site's development for housing, subject to potential flooding issues related to the burn which flows through the site being addressed. I also accept that its development for individual plots could help to widen the range and type of site which is available, both in Kilmacolm and more generally in Inverclyde. Being some 400 metres from the centre of the village, and on a radial route which carries bus services to and from Port Glasgow and beyond, the residents of any houses built here would have good access both to the facilities and amenities of Kilmacolm, and also of the other nearby towns. Due to its small size, any contribution to the provision of affordable housing here is likely to be very limited. While the site is not currently under the control of a house-building company, I am satisfied that there is likely to be demand for new plots or houses here. I therefore find that the site could be treated as capable of being effective, as it is likely that house completions could be delivered here within the plan period. Nonetheless, both in the light of my conclusions in relation to this site's inclusion within the green belt, and as I have found that the allocation of additional land for housing development is not at present required in the Kilmacolm and Quarriers Village area of Inverclyde, I conclude that this site should not be allocated for housing development in this plan.

Green Belt boundary issues

Robustness of existing boundary	Boundary formed by Port Glasgow Road.
Robustness of proposed boundary	Boundary to be formed by the rear boundaries of the proposed houses.

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Potential flood risk from minor watercourse through site and adverse effects on water environment through proposed culverting of watercourse. Known hydraulic constraints within the waste water network.
Biodiversity	11	No environmental designations within or in close proximity to the site, but mature trees and hedgerows along north west boundary.
Climatic Factors	7, 5	Car travel and associated emissions will be minimized as site is within 400m of bus stop with at least 1 bus per hour between 7am and 7pm on weekdays
Air	13	Short term impacts during the construction phase, but unlikely to lead to the designation of an AQMA

Soil	13,4	No carbon rich soils or priority peatland within site. Development of greenfield land
Landscape	11	Prominent site on the south-west side of Port Glasgow Road. Development would have an adverse impact on the sensitive green wedge character of Kilmacolm. It would also be visible from both the north west entrance to the village and from the south west part of the village.
Material Assets	4	Greenfield development
Cultural Heritage	10	Not in close proximity to any designated cultural heritage assets
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. Site is 320m from active travel network and within an accessible distance of local services – 220m.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Kilmacolm/Quarrier's Village LNCS Assessment Summary (2017)

Site not assessed

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	Suitable visibility should be provided from access. Parking should be provided in accordance with approved parking standard. Vehicle access must enter and exit in forward gear.
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	Scottish Water confirm that there is sufficient water and waste treatment work capacity to service proposed demands, but further investigations may be required to determine impacts on network capacities. No comments received from other utility providers.

Does the proposal raise any educational capacity issues?	Depending on the scale of land identified for housing in the Kilmacolm Primary School catchment, there could be potential capacity issues.
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Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	Submission indicates that various unnamed developers have expressed interest.
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Kilmacolm as a strong market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	The number of units proposed could be developed by 2024.

Key Agency Comments

HES	No comment
NatureScot	These are prominent sites on the south-west side of Port Glasgow Road. Development here would have an adverse impact on the sensitive green wedge character of Kilmacolm. It would also be visible from both the NW entrance to the village and from the SW part of the village. If allocated, landscape features such as hedgerows should be retained contributing to a landscape framework. Development proposals should be coherent with existing development.
Scottish Forestry	No comment
SEPA	<p>Flood risk - A minor watercourse flows through allocation and potential flood risk from this source should be taken cognisance of. A basic FRA, consisting of topographic information in the first instance and a detailed layout plan will be required.</p> <p>Water environment - A minor watercourse goes through the site. The number of properties suggests this would require culverting. This should be actively discouraged.</p>
Scottish Water	<p>There is sufficient water and waste water treatment works capacity to service proposed demands.</p> <p>Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any, this development has on the existing water treatment network.</p> <p>As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>Near-by watercourse should support a surface water solution - please see Scottish Water advice and policy on Surface Water.</p>
Sportscotland	No comment

SPT	Public transport accessibility information provided under 'Climatic factors' topic in the sustainability assessment.
Transport Scotland	No comment

Other comments received to MIR consultation

In addition to any representations received from the site promoter or key agencies (see above):

- 1 representation supported the proposal
- 2 representations objected to the proposal on the basis that the site should remain green belt

Summary and conclusion

The watercourse running through the site, and the requirement for it to be culverted for the site to be developed is considered to be a technical constraint.

No environmental designations within the site and no significant effects on natural heritage identified, subject to trees/hedgerows being retained. Development of this site would constitute ribbon development along Port Glasgow Road and adversely impact the eastern approach to the village.

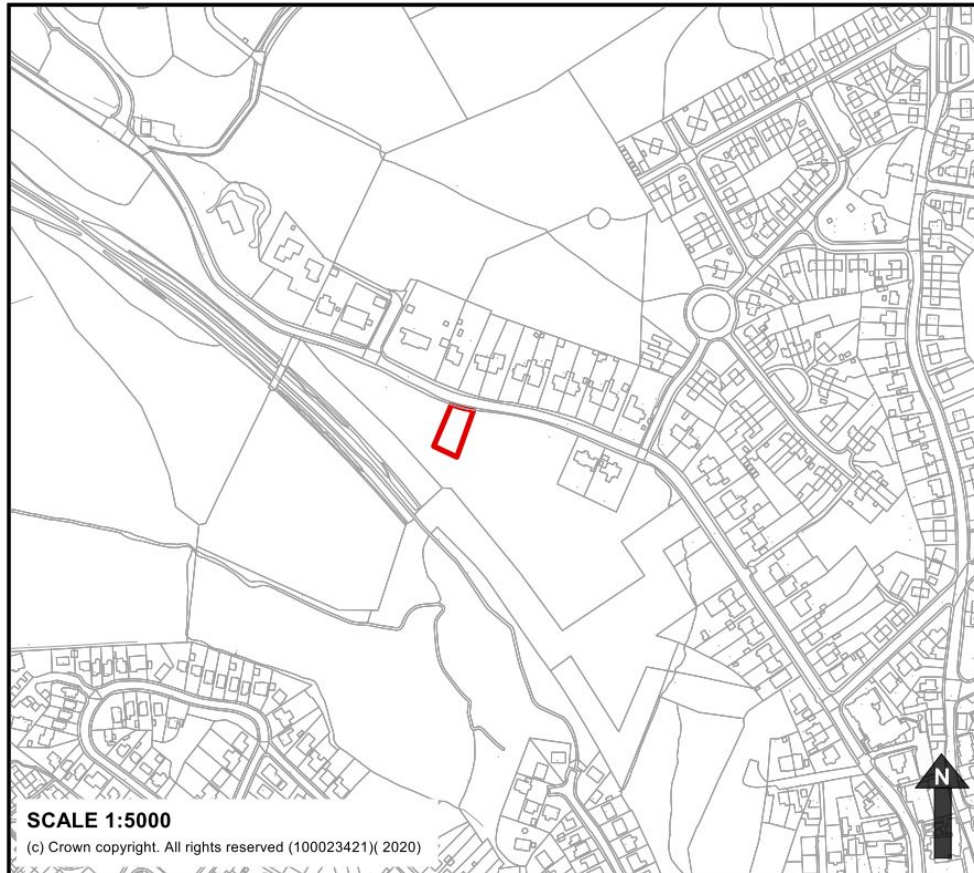
The site is within an accessible distance of a regular public transport service and everyday services in Kilmacolm and in close proximity to the core path network.

The site is in a marketable area, there has been unnamed developer interest, and it is considered that the proposal could also be progressed as plotted development.

With regard to the above and the findings of the Housing Land Technical Report 2021, it is not considered appropriate or necessary to allocate this site for housing development in the Proposed Local Development Plan.

Site Details

Site name	Port Glasgow Road (2)
Settlement	Kilmacolm
Call for Sites reference	CFS11
Site size (ha)	0.08
Current use	Agriculture
Existing LDP designation	Green Belt



Proposal

Submitted by	Gryffe Developments Ltd
Proposed Use	Residential
Number of houses/floor space	1
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p>The site is adjacent to the public transport system and in close proximity (within comfortable walking distance) to local services in Kilmacolm village centre. All utility services are immediately available on Port Glasgow Road. The proposal would help meet the increasing and necessary housing needs of Kilmacolm and the identified housing shortfall as (1) the site is deliverable within the next 5 years, (2) is unencumbered by physical constraints, (3) located in a residentially attractive area of Kilmacolm, and (4) the owner indicating a wish to self-build. We believe that this site offers an opportunity to correct an anomaly in the urban form and to connect up the development of the south-west side of Port Glasgow Road.</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> • Arguments in favour of the Allocation of Port Glasgow Road, Kilmacolm • MIR Response <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p><i>Landscape/Green Belt</i> – The proposal would not constitute ribbon development as precedent was set for development on this site by the houses situated at Penlee and Creggan, approximately 90 metres away on the same side of the road. Development of this site would help balance the urban form on both sides of Port Glasgow Road at this location and strengthen the greenbelt by helping to complete the pattern of development along Port Glasgow Road.</p>

Planning History

Planning Applications	No recent applications
Previous Plan – Reporters Comments	n/a

Green Belt boundary issues

Robustness of existing boundary	Formed by Port Glasgow Road
Robustness of proposed boundary	To be formed by proposed development boundary

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Known hydraulic constraints within the waste water network.
Biodiversity	11	No environmental designations within or in close proximity to the site. Hedgerow along northern boundary.
Climatic Factors	7, 5	Car travel and associated emissions will be minimized as site within 400m of bus stop with at least 1 bus per hour between 7am and 7pm on weekdays
Air	13	Short term impacts during the construction phase, but unlikely to lead to the designation of an AQMA
Soil	13,4	No carbon rich soils or priority peatland within site. Development of greenfield land
Landscape	11	Prominent site located on the south-west side of Port Glasgow Road. While there is existing development on the north-east side of the road, the site is isolated from other development on the south-west side. Development would have an adverse impact on the sensitive green wedge character of Kilmacolm. It would also be visible from both the north west entrance to the village and from the south west part of the village.
Material Assets	4	Development of greenfield land
Cultural Heritage	10	Not in close proximity to any designated cultural heritage assets
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. Site 180m from active travel network and within accessible distance of local services – 503m.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	No
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	Suitable visibility should be provided from access. Parking should be provided in accordance with approved parking standard. Vehicles must enter and exit in forward gear.
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	Scottish Water confirm that there is sufficient water and waste treatment work capacity to service proposed demands, but further investigations may be required to determine impacts on network capacities. No comments received from other utility providers.
Does the proposal raise any educational capacity issues?	Depending on the amount and delivery of land identified for housing in the Kilmacolm Primary School catchment, there could be potential capacity issues.

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	Yes - Owner wishes to develop.
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Kilmacolm as a strong market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	Yes

Key Agency Comments

HES	No comment
NatureScot	This is a prominent site located on the south-west side of Port Glasgow Road. Whilst there is existing development on the north-east side of the road, this site is isolated from other development on the south-west side. Development here would have an adverse impact on the sensitive green wedge character of Kilmacolm. It would also be visible from both the NW entrance to the village and from the SW part of the village. Should the site be allocated, existing landscape features such as hedgerows should be retained and reinforced to contribute to a landscape framework. Development proposals should be coherent with existing development.
Scottish Forestry	Very few mature broad leaves trees
SEPA	Flood risk - None apparent Water environment - No comment
Scottish Water	There is sufficient water and waste water treatment works capacity to service proposed demands.

	<p>Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any this development has on the existing water treatment network.</p> <p>There are known hydraulic constraints within the waste water network, and known local flooding hot spots. Therefore it is likely that the developer be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>Near-by watercourse should support a surface water solution - please see Scottish Water advice and policy on Surface Water.</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under 'Climatic factors' topic in the sustainability assessment.
Transport Scotland	No comment

Other comments received to MIR consultation

In addition to any representations received from the site promoter or key agencies (see above):

- 1 representation supported the proposal
- 2 representations objected to the proposal on the basis that the site should remain green belt

Summary and conclusion

The Port Glasgow Road (2) site is not known to have any significant technical constraints which would impact deliverability. Potential water and waste water network issues can be addressed at the planning application stage.

No environmental designations covering the site, but the proposal would adversely affect landscape character through development on one Kilmacolm's characteristic green wedges. Development of this site would also constitute ribbon development along Port Glasgow Road, which would impact on the eastern approach to the village.

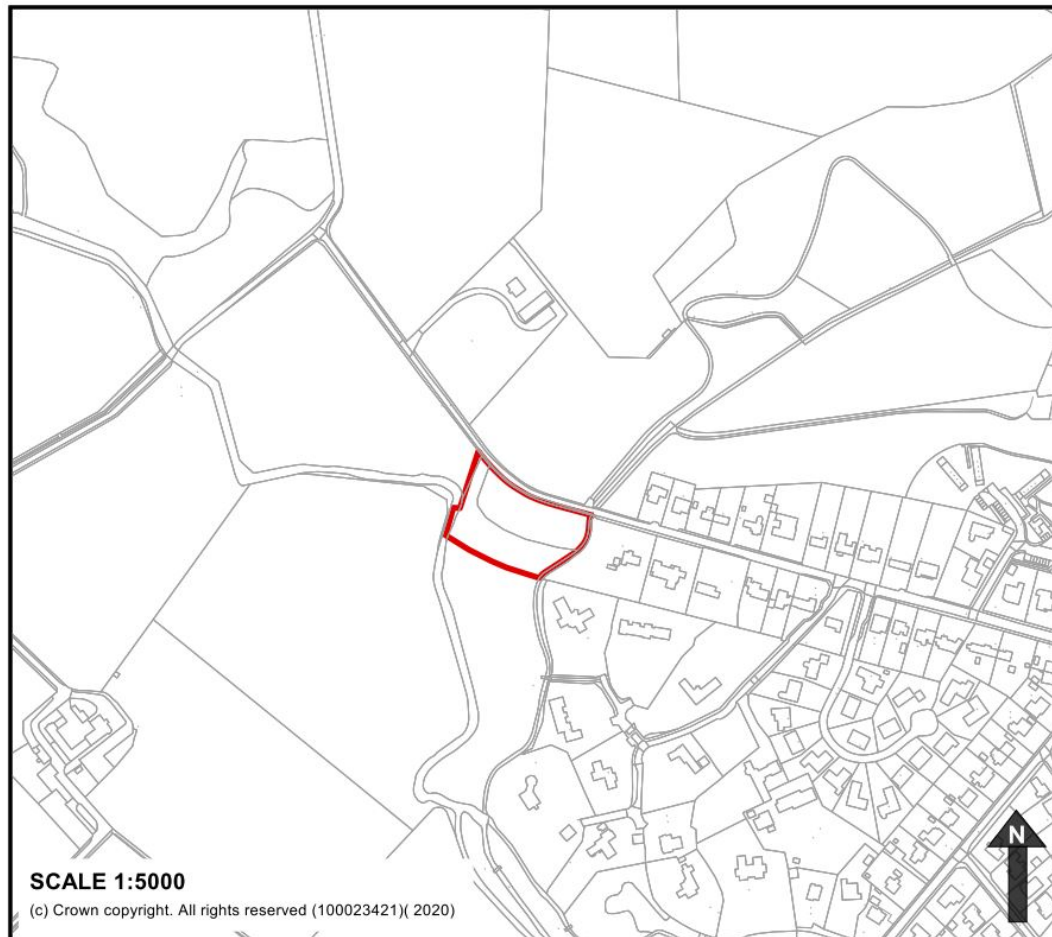
The site is within an accessible distance of a regular public transport service and everyday services in Kilmacolm, and in close proximity to the core path network.

The site is in a marketable area with development to be undertaken by the plot owner.

With regard to the above and the findings of the Housing Land Technical Report 2021, it is not considered appropriate or necessary to allocate this site for housing development in the Proposed Local Development Plan.

Site Details

Site name	Knockbuckle Road
Settlement	Kilmacolm
Call for Sites reference	CFS12
Site size (ha)	0.57
Current use	Wooded area
Existing LDP designation	Green Belt



Proposal

Submitted by	Knockbuckle Estates Ltd
Proposed Use	Residential
Number of houses/floorspace	2 houses (Call for Sites submission)
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response.	<p>Proposal to create two large high quality unique houses in keeping with adjacent houses. The site offers close access to the public transport system and is in close proximity (within 600m, 10 – 15 minutes' comfortable walking distance) of local services in Kilmacolm. All utility services are available on Knockbuckle Road. The site lies in a commercially attractive part of Kilmacolm, has attracted interest from a variety of existing residents who have indicated a strong interest in pursuing this site, and has no known development constraints. It is deliverable within the next 5 years and would help meet the identified housing shortfall.</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> • Arguments in favour of the Allocation of Knockbuckle, Road, Kilmacolm • MIR Response <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p><i>Flood Risk</i> – We fully appreciate that a full flood risk assessment is necessary on both the River Gryffe and also the burn that separates the site from the village envelope.</p> <p><i>Biodiversity</i> – No flora or fauna would be affected. Current usage has left coarse grasses and rocky outcrops. The site was historically densely tree covered with straggly conifers, but now there is only sporadic tree covering. All such trees, hedging and planting will remain within future development to maintain a private garden setting.</p> <p><i>Proximity to services and public transport</i> – walking distance to Kilmacolm centre is 15 minutes. Public transport available at Kilmacolm Cross.</p> <p><u>Green Belt</u> - there is no further opportunity to extend the urban pattern to the south or north-west of this site as these areas are liable to flooding and no further extension of the built environment is possible.</p>

Planning History

Planning Applications	No recent applications
Previous Plan – Reporters Comments	n/a

Green Belt boundary issues

Robustness of existing boundary	Formed by small watercourse
Robustness of proposed boundary	Would be formed by road to north and River Gryffe to west. Southern boundary would need to be created.

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Majority of site within a medium/high fluvial flood risk area, with potential flood risk from watercourse through site. Surface water flood hazard identified. Known hydraulic constraints within the waste water network. Potential adverse effects on minor watercourse.
Biodiversity	11	While the whole site is covered by a Tree Preservation Order, there is an area of open ground within the northern part. Development of the whole site would have a significant adverse impact on the semi-natural woodland which covers the majority of the site.
Climatic Factors	7, 5	Likely to increase car travel and associated emissions as site not accessible to public transport provision
Air	13	Short term impacts during the construction phase, but unlikely to lead to the designation of an AQMA
Soil	13,4	No carbon rich soils or priority peatland within site. Development of greenfield land
Landscape	11	Potential for adverse effects as site contributes to the gateway to Kilmacolm from the west.
Material Assets	4	Development of greenfield land
Cultural Heritage	10	Not in close proximity to any designated cultural heritage assets
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. Site 980m from active travel network. Not within accessible distance of local services – 1320m.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Kilmacolm/Quarrier's Village LNCS Assessment Summary (2017)

Site not assessed

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	Extend footway, lighting and 30mph zone, possible widen road over the site. Suitable visibility should be provided from access. Vehicles must enter and exit in forward gear.
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	Scottish Water confirm that there is sufficient water and waste treatment work capacity to service proposed demands, but further investigations may be required to determine impacts on network capacities. No comments received from other utility providers.
Does the proposal raise any educational capacity issues?	Depending on the amount and delivery of land identified for housing in the Kilmacolm Primary School catchment, there could be potential capacity issues.

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	Submission indicates interest from various unnamed parties.
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Kilmacolm as a strong market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	Yes

Key Agency Comments

HES	No comment
NatureScot	This site contributes to the gateway to Kilmacolm from the west. Any development proposals should enhance the character of the gateway. Much of the site is covered by Ancient and semi-natural woodland which should be retained and incorporated into the design of the development.
Scottish Forestry	Mixed woodland, mainly conifers, covering 50% of area.
SEPA	Flood risk - A substantial part of the site may lie within the 1 in 200 year floodplain. No development should take place within this area. Minor watercourse/drain flows through allocation and potential flood risk from this source should be taken cognisance of. Flood Risk Assessment

	<p>required. A surface water flood hazard has been identified and should be discussed with FRMA and Scottish Water. Appropriate surface water management measures should be adopted.</p> <p>Water environment - Maintain the development at least 10m away from both watercourses at the perimeter of the site</p>
Scottish Water	<p>There is sufficient water and waste water treatment works capacity to service proposed demands.</p> <p>Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any this development has on the existing water treatment network.</p> <p>As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under Climatic factors topic in the SEA summary.
Transport Scotland	No comment

Other comments received to MIR consultation

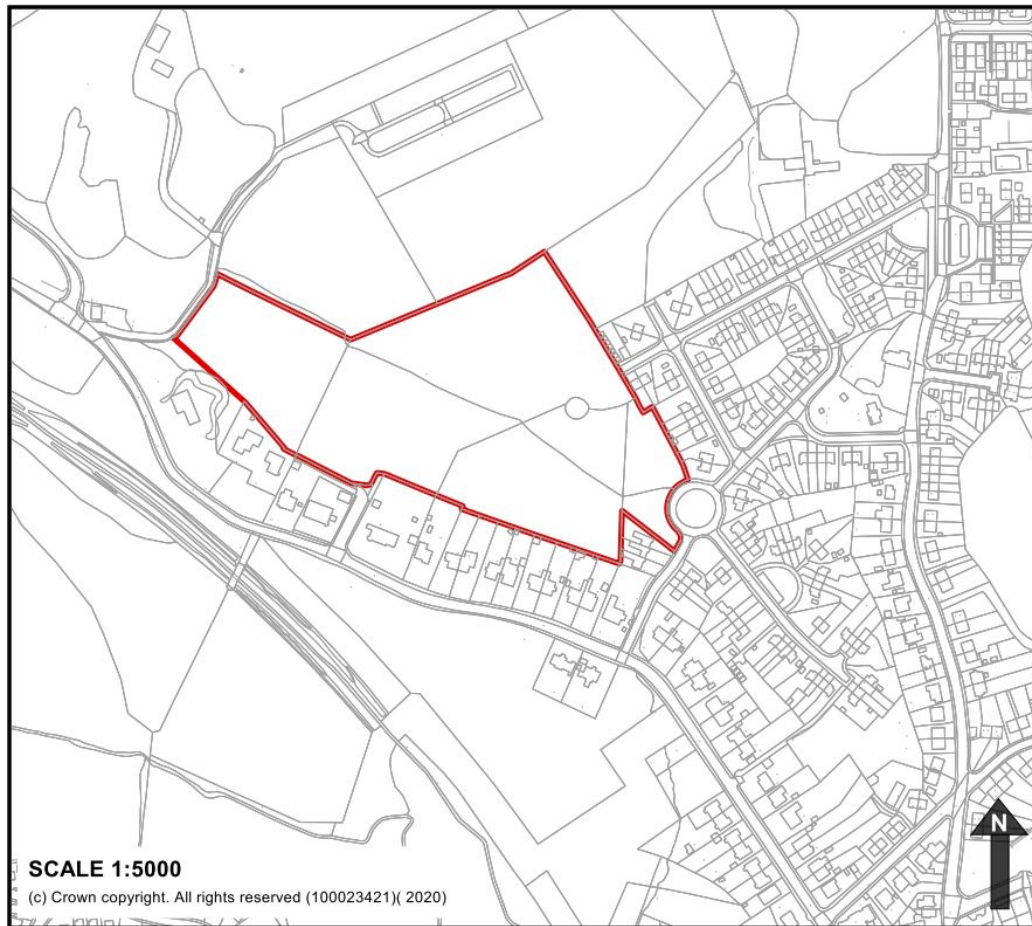
<p>In addition to any representations received from the site promoter or key agencies (see above):</p> <ul style="list-style-type: none"> Two representations objected to the proposal on the basis that the site should remain greenbelt
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Summary and conclusion

<p>The Knockbuckle Road site is not known to have any significant technical constraints which would impact deliverability. Flood risk and potential water and waste water network issues can be addressed at the planning application stage.</p> <p>While woodland covers the majority of the site, it is proposed that this area would not be developed. The proposal would extend the village westwards, thereby breaching an existing robust green belt boundary. While the River Gryffe would provide a boundary to further western expansion, there could be pressure for southern expansion of the site. The site is not within an accessible distance of a regular public transport service or everyday services in Kilmacolm.</p> <p>While site is in a marketable area, the proposal does not have interest from a proven developer.</p> <p>With regard to the above and the findings of the Housing Land Technical Report 2021, it is not considered appropriate or necessary to allocate this site for housing development in the Proposed Local Development Plan.</p>

Site Details

Site name	West of Quarry Drive
Settlement	Kilmacolm
Call for Sites reference	CFS13
Site size (ha)	5.09
Current use	Agriculture
Existing LDP designation	Green Belt



Proposal

Submitted by	Mactaggart & Mickel Homes Ltd
Proposed Use	Residential
Number of houses/floorspace	78 houses
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p>Proposal is for 58 houses for private sale and 25%/or 20 houses affordable, across a range of house types and sizes. The form and layout in the Development Framework, allied to the generous open space provision and proximity to footpath and cycle networks and the surrounding countryside, can ensure that the development will offer opportunities for social interaction and physical activity, all of which benefit health. The site is in close proximity to bus routes and within an approximate 10-minute walk (around 850m) to other local services in Kilmacolm village centre. All utility connections are available to the site. There are no adverse impacts arising from the development that would significantly and demonstrably outweigh the presumption in favour of development that contributes towards sustainable development.</p> <p>The site is effective relative to the tests in PAN 2/2010 and is being promoted by an established house builder. The proposal can make an important contribution to the shortfall of land for housing in the Inverclyde Council area over the Plan period.</p> <p>Inverclyde Council supported the allocation of this site for residential development during the last Local Development Plan process, which demonstrates that the site is suitable for residential development, effective and able to be developed over the Plan period.</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> • Location Plan • Illustrative Site Development Plan • Indicative Spatial Masterplan • Landscape and Visual Impact Assessment • Preliminary Ecological Appraisal • Transport Statement • Flood Risk Assessment • Drainage Strategy Report • Tree Survey • Sustainable Development Strategy • Economic Benefit Statement <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p>

	<p><i>Flood Risk</i> – The submitted Flood Risk Assessment demonstrates that the proposed site is not at risk of flooding and will not increase flood risk elsewhere. SEPA have confirmed that they have no objection.</p> <p><i>Biodiversity</i> – The indicative masterplan shows that existing trees within the site are proposed to be retained. While the submitted ecological survey found that the site has minimal nature conservation value and a lack of notable flora species, it identified that (1) a small number of existing trees within the site have bat roost potential and recommends further survey work prior to development commencing, (2) that the stone walls on the site edges are potential reptile habitat and caution is therefore recommended for any work in the vicinity, and (3) that any vegetation clearance work should avoid bird breeding season. The ecological report also recommends ecological management/biodiversity enhancement.</p> <p><i>Landscape</i> – A Landscape Assessment has found that the site is discretely located behind established residential areas and between these residential areas and the Kilmacolm Cemetery. It also found that the site is not highly visible in the landscape, a fact recognised by the Council in the preceding Local Development Plan process, and reflected in the fact that the Council actually defined the site that is now subject of this representation as they considered development here would have limited and acceptable landscape impact. The Council are proposing to extend the existing cemetery, most likely to the south towards the application site. This, when taken along with the tree belt that is proposed on the northern edge of the Mactaggart & Mickel development, the new settlement/green belt edge will be enhanced from the existing garden fences and low walls, and so will help to protect and enhance the landscape setting and identity of the settlement.</p>
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Planning History

Planning Applications	20/0245/IC – Planning application in principle for residential development (approx. 78 houses). IC/04/071 Proposed new residential development. Refused 7/9/04.
Previous Plan – Reporters Comments	In its assessment of all the suggested sites, the council found that this greenfield land on the north-west edge of Kilmacolm would be the most appropriate to allocate for housing land. However, its allocation was not included in the proposed plan, and I have now found that there is not a requirement for additional land to be allocated for housing development in the Kilmacolm and Quarriers Village area at this time. The use of brownfield land is generally to be preferred, but there are circumstances in which the development of some greenfield sites such as this can be necessary, and where some impact on the amenity of those currently living on the outer edge of settlements may be inevitable. This site lies between the houses that form a ribbon extending the village out along the Port Glasgow Road to the west, and the houses on Springwood Drive and the houses and garages at the end of Quarry Drive to the east. I am satisfied that a robust new edge to the settlement could be achieved in conjunction with its development, and thus be regarded as consolidating or rounding off the boundary of Kilmacolm. However, I also find that this rising site does retain its rural character and continues to make a positive contribution to the setting of the village. The site adjoins an area to the north-east which has now been designated as a local nature conservation site. However, subject to this area being safeguarded in the detailed layout and design, the proposed development

	is unlikely to result in unacceptable ecological impacts. Some additional affordable housing would be secured, and the residents of any new houses built here would enjoy good access to the varied facilities of Kilmacolm. As the site is under the control of a house-builder and there appear to be no infrastructure constraints or other restrictions which would prevent its development, I am satisfied that this is a site which is capable of becoming effective and delivering house completions within the plan period. However, in the circumstances where I have concluded that there is not a requirement to allocate additional land for housing in Kilmacolm, I have not identified any further benefits of a type or scale which would nonetheless justify allocating this greenfield site for development at this time.
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Green Belt boundary issues

Robustness of existing boundary	To the south of the site, the boundary is identified by the rear gardens of the residential properties along Port Glasgow Road and to the east by Quarry Drive, houses at Springwood Drive and the boundary with the area of Open Space, which is a post and wire fence.
Robustness of proposed boundary	To be formed by structural planted edges.

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	While a surface water flood hazard is identified on a small part of site and there are known hydraulic constraints within the waste water network, it is noted that the Flood Risk Assessment and Drainage Impact Assessment submitted with planning application 20/0245/IC were acceptable to SEPA and the Council.
Biodiversity	11	Site is adjacent to a Local Nature Conservation site. The submitted ecological appraisal found that the site comprises semi-improved grassland, scrub, two small areas of wet flush, improved grassland previously grazed by horses, stone walls, mature/parkland trees and hedgerows. The habitats and plant species recorded within the site boundaries are indicated as widespread and common throughout the central belt with no further habitat assessment currently advised. It is noted that, with regard to planning application 20/0245/IC, the Council's ecology advisor did not consider that development would have adverse effects on the LNCS and raised no concerns over the methodology or the mitigation and enhancement measures identified in the ecological appraisal.
Climatic Factors	7, 5	Car travel and associated emissions would be minimised as the site is within 400m of bus stop with at least 1 bus per hour between 7am and 7pm on weekdays
Air	13	Short term impact during construction phase, but unlikely to lead to designation of an AQMA
Soil	13,4	No carbon rich soils or priority peatland within site. Development of greenfield land
Landscape	11	Site is discreetly located within existing landscape features, including semi-natural woodland and stone walls, which the proposal indicates will be reinforced. It is considered that development, in principle, would not have significant adverse effects at the settlement level. This is supported by the Landscape and Visual Impact Assessment (LVIA) submitted with the proposal, which found that "the scale and context of the receiving landscape is such that it can accommodate the proposed development without detrimental effects on the overall landscape setting or visual amenity experienced across the study area".

		It is noted that the LVIA also found that there would be significant permanent adverse effects on views and visual amenity for residential properties in the immediate vicinity of the site boundaries (approx. 100m).
Material Assets	4	Greenfield development
Cultural Heritage	10	Auchenbothie House Lodge, which is a category B listed building, is approximately 50 metres from the application site. Given the separation distance and the intervening topography and woodland behind this building, it is not considered that the setting of this listed building will be adversely affected. The James Reid Headstone within Kilmacolm Cemetery lies to the north, and is also a category B listed building. There will be clear views of the development from the Cemetery however the James Reid Headstone is viewed in the context of the Cemetery and it is not considered that the development would have any impact on its setting.
Population and Health	5, 8, 13	While development would result in a small area of safeguarded open space within the south eastern boundary being lost, this area provides transport amenity and has little functional value. In addition, development would be required to contribute to wider green infrastructure provision, including open space, which would outweigh the loss. Site 490m from active travel network and within an accessible distance to local services – 460m.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Kilmacolm/Quarrier's Village LNCS Assessment Summary (2017)

<p>(Relates to assessment of a larger site previously submitted)</p> <p>The West Quarry site in isolation scored relatively low, in part due to a lack of fauna data. However it does have some localised features of conservation value but they occupy a small area relative to the large amounts of arable (ploughed) ground and more improved pasture within the site boundary. The large arable area in the north is of very little value for conservation but there is some interest in the relic area of (semi-improved) meadow grassland in the south east and this area has considerable potential for the restoration of a more diverse lowland meadow. Lowland meadow is a UK BAP priority habitat and its decline in the UK is well documented. Some species rich grasslands persist in Inverclyde but many are more acidic pastures and few are of the more neutral lowland type. Several relic lowland meadow species have survived, including the nationally rare and endangered greater butterfly-orchid and whorled caraway, a species with a very local distribution in Scotland. The site represents one of high potential for the restoration of a flower-rich meadow as it supports a reservoir of old grassland indicator species and the soil ecology will be more amenable to restoration contrasted with other sites used in grassland creation projects. The meadow relics along with the scrub and marshy grassland would be of value for local people who already appreciate the site and use it often.</p>

It is proposed that a small wetland section of West Quarry is included in the proposed LNCS (at Planetreeyetts) shown on Figure 14. The potential for enhancement has not been raised at any of the other sites, however it is of some significance at this site. With restoration efforts, and longer term sympathetic management, the core areas of relic grassland, and the adjacent marshy areas, could be considered as extensions to the proposed LNCS site comprising the western side of Planetreeyetts.

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	Preferred access to the site from Wateryetts Drive roundabout. Provide pedestrian/ cycle links to Port Glasgow Road. Suitable visibility should be provided at all accesses. Parking should be provided in accordance with approved parking standard. Development should include measures to reduce vehicle speeds within the site.
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	Scottish Water confirm that there is sufficient water and waste treatment work capacity to service proposed demands, but further investigations may be required to determine impacts on network capacities. No comments received from other utility providers.
Does the proposal raise any educational capacity issues?	Depending on the amount and delivery of land identified for housing in the Kilmacolm Primary School catchment, there could be potential capacity issues.

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	Yes – Mactaggart & Mickel Homes Ltd
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Kilmacolm as a strong market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	It is expected that the site could deliver some housing by 2024 and remainder by 2032.

Key Agency Comments

HES	No comment
NatureScot	We note that this site has been subject to an ecological appraisal which recommends that further survey work is carried out prior to development commencing as some existing trees have bat roost potential. We welcome the intention to incorporate biodiversity enhancement measures into

	<p>the development proposal. There are some trees covered by the semi-natural woodland inventory which we recommend retaining and incorporating into the design of the development. These could contribute to enhanced habitat networks.</p> <p>We note that a Landscape Assessment has also been carried out. We agree that the site is discretely located, however, highlight the value of including a suitable landscape framework (reinforcing features such as the semi-natural woodland and walls).</p> <p>The site also appears to have some recreational use with informal paths. Development proposals should retain these and create a network of paths to encourage active travel.</p>
Scottish Forestry	Very few mature broad leaves trees
SEPA	<p>Flood risk - A surface water flood hazard has been identified and should be discussed with FRMA and Scottish Water. Appropriate surface water management measures should be adopted.</p> <p>Water environment: No comment</p>
Scottish Water	<p>There is sufficient water and waste water treatment works capacity to service proposed demands.</p> <p>Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any, this development has on the existing water treatment network.</p> <p>As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>There is a 225mm combined foul drainage pipe within the boundary of the site - please see Scottish Water advice on infrastructure conflicts.</p> <p>Near-by watercourse which should support a surface water solution - please see Scottish Water advice and policy on Surface Water.</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under Climatic factors topic in the SEA summary.
Transport Scotland	No comment

Other comments received to MIR consultation

<p>In addition to any representations received from the site promoter or key agencies (see above):</p> <ul style="list-style-type: none"> 86 representations objected to the proposal on a wide range of grounds, including loss of green belt, potential for development to increase pressure for further green belt development, adverse effects on landscape character and setting, loss of a valued recreational and ecologically rich area, adverse effects relating to increased traffic (i.e. safety, noise/air pollution), insufficient infrastructure (i.e. roads, local services, schools etc.); loss of outlook / views. No established need for further housing in Kilmacolm and availability of many brownfield sites in Inverclyde.
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- 1 representation supported the proposal if a housing need is proven

Summary and conclusion

The Quarry Drive site is not known to have any significant technical constraints which would impact delivery.

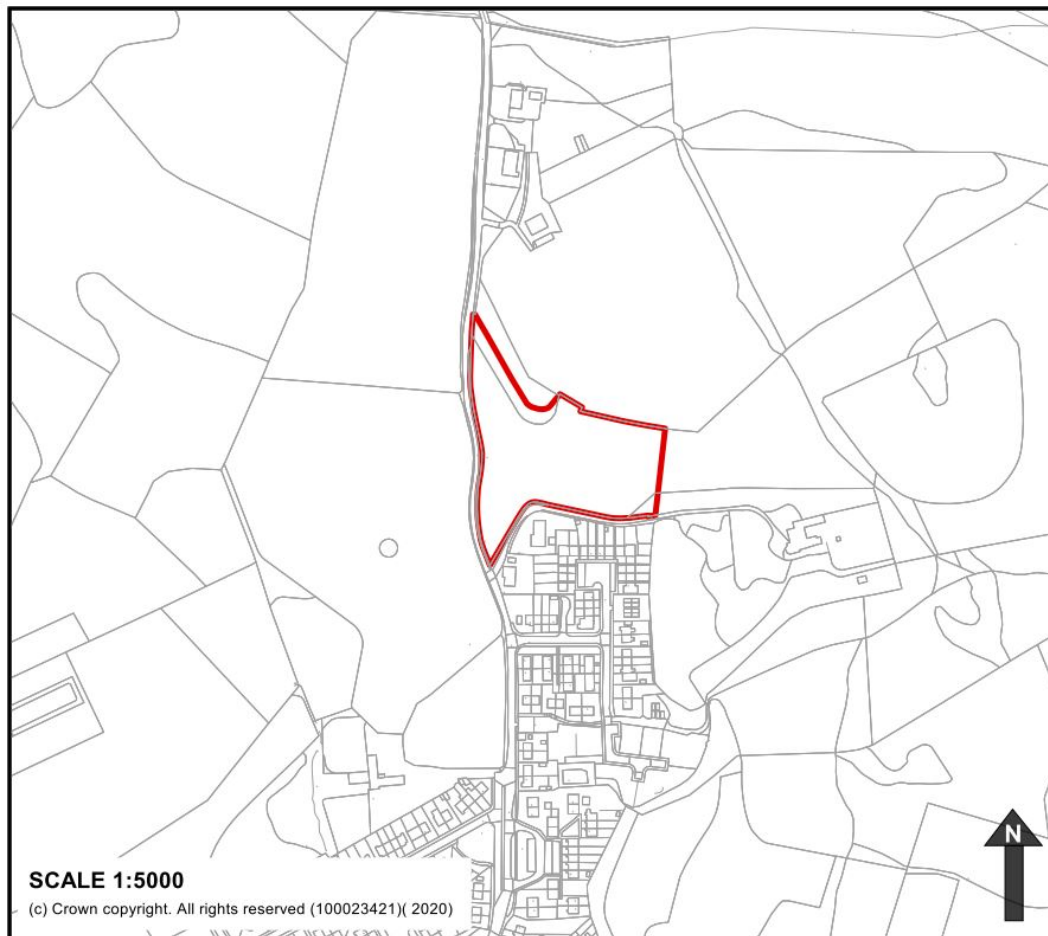
No environmental designations cover the site and development is unlikely to have any significant effects on wider natural heritage interests, subject to identified mitigation. Development would be contained within the urban form of Kilmacolm and existing landscape features, with only localised adverse effects on landscape character and visual amenity (i.e. within approx.. 100m of the site boundaries). It is considered that development on this site would have significantly less adverse impacts on landscape character and setting than other options in the village. A robust green belt boundary would have to be created. Site within an accessible distance of a regular public transport service and everyday services in Kilmacolm. Within 490m of the active travel network.

As the site is in a marketable area, a proven house builder is attached to the proposal and a planning permission in principle has recently been approved, it is considered that some housing could be delivered by 2024 with the remainder by 2032

With regard to the above and the findings of the Housing Land Technical Report 2021, it is considered that the west of Quarry Drive site should be allocated for housing development in the Proposed Local Development Plan.

Site Details

Site name	Migdale
Settlement	Kilmacolm
Call for Sites reference	CFS14
Site size (ha)	1.31
Current use	Agriculture
Existing LDP designation	Green Belt



Proposal

Submitted by	Named individual
Proposed Use	Residential
Number of houses/floorspace	6 houses (Call for Sites submission)
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p>If allocated, the site will be offered to local builders or alternatively developed as a custom or self-build. Self/custom build is an important emerging segment of the housing market that the Scottish Government is actively promoting. Small developments like this could make a vital contribution to increasing housing supply, and supporting SMEs and greening agenda. By identifying a number of sites like Migdale the village will grow more organically as it has in the past rather than having large homogenous estates imposed upon it. A number of sites will aid delivery, assist local small builders and have a greater variety of bespoke design types. Unlike some bigger house developers the landowner will be looking to sell the site as soon as an allocation is confirmed. There are no known constraints.</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> MIR response <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p><i>Biodiversity</i> – The Council’s LNCS assessment in 2017 noted that “Site overall is of limited current nature conservation value due in part to its small size, and overall lack of high quality habitats.</p> <p><i>Landscape</i> – The northern and eastern sides of the site are well contained by rising landform beyond the site boundary, and also to the south by an existing housing estate forming the northern end of Kilmacolm.</p> <p><i>Proximity to public transport and local services</i> – Approx. 300 metres to nearest bus stop and 1.1km to Kilmacolm local centre.</p> <p><i>Green Belt boundary</i> – There is sufficient space within the site to create a strong boundary with landscape planting as necessary. The intention with this site is to create a cul de sac development within the existing boundaries and that which could be created on its eastern side. Post development there would therefore be a robust boundary on all sides.</p>

Planning History

Planning Applications	No recent applications
Previous Plan – Reporters Comments	n/a

Green Belt boundary issues

Robustness of existing boundary	Formed by an unnamed road.
Robustness of proposed boundary	Formed to the north, to a certain extent, by a landform on which there are mature trees, although this only extends along part of the boundary. Eastern boundary has been drawn to match existing eastern extent of existing settlement, but there are no strong features on the ground.

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Known hydraulic constraints within the waste water network.
Biodiversity	11	No environmental designations within or in close proximity to the site. A few mature trees within southern boundary. Evidence of protected species on site.
Climatic Factors	7, 5	Likely to increase car travel and associated emissions as site within 400m of a bus stop, but very limited service provision.
Air	13	Short term impacts during the construction phase, but unlikely to lead to the designation of an AQMA
Soil	13,4	No carbon rich soils or priority peatland within site. Development of greenfield land
Landscape	11	This is an elevated, open and prominent site which helps define the current landscape setting and approach to Kilmacolm. Development likely to have adverse effects on local landscape character and the landscape setting of the village.
Material Assets	4	Development of greenfield land
Cultural Heritage	10	Not in close proximity to any designated cultural heritage assets
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. Site 750m from active travel network, but not within an accessible distance of local services – 810m.

Kilmacolm/Quarrier's Village LNCS Assessment Summary (2017)

<p>Migdale is a very small site on sloping ground, which is hard to score highly in isolation. It does have some indicators of relatively unimproved lowland meadow, which is now a very rare sight locally (or nationally), and there is one species record (field scabious) that is of high local significance.</p> <p>Evidence of protected species</p>
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Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	Main access from Finlaystone Road. Suitable visibility should be provided from access. Requires footway, street lighting and 30mph speed limit to be extended northward beyond the access point. Parking should be provided in accordance with approved parking standard. Development should include measures to reduce vehicle speeds within the site. Street lighting to be provided throughout site.
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	Scottish Water confirm that there is sufficient water and waste treatment work capacity to service proposed demands, but further investigations may be required to determine impacts on network capacities. No comments received from other utility providers.
Does the proposal raise any educational capacity issues?	Depending on the amount and delivery of land identified for housing in the Kilmacolm Primary School catchment, there could be potential capacity issues.

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	No. Submission indicates it could be developed as a self-build or by a small house builder
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Kilmacolm as a strong market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	Yes, although self-build/ small developer may extend the development period beyond 2024.

Key Agency Comments

HES	No comment
NatureScot	This site is on rising ground. It is an open and prominent site which helps define the current landscape setting and approach to Kilmacolm. Development of this site would have adverse impacts on local landscape character and would compromise the landscape setting of the existing village.
Scottish Forestry	Few trees bordering the site
SEPA	Flood risk - No flood risk apparent

	Water environment - No comment
Scottish Water	<p>There is sufficient water and waste water treatment works capacity to service proposed demands.</p> <p>Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any this development has on the existing water treatment network.</p> <p>As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under 'Climatic factors' topic in the sustainability assessment.
Transport Scotland	No comment

Other comments received to MIR consultation

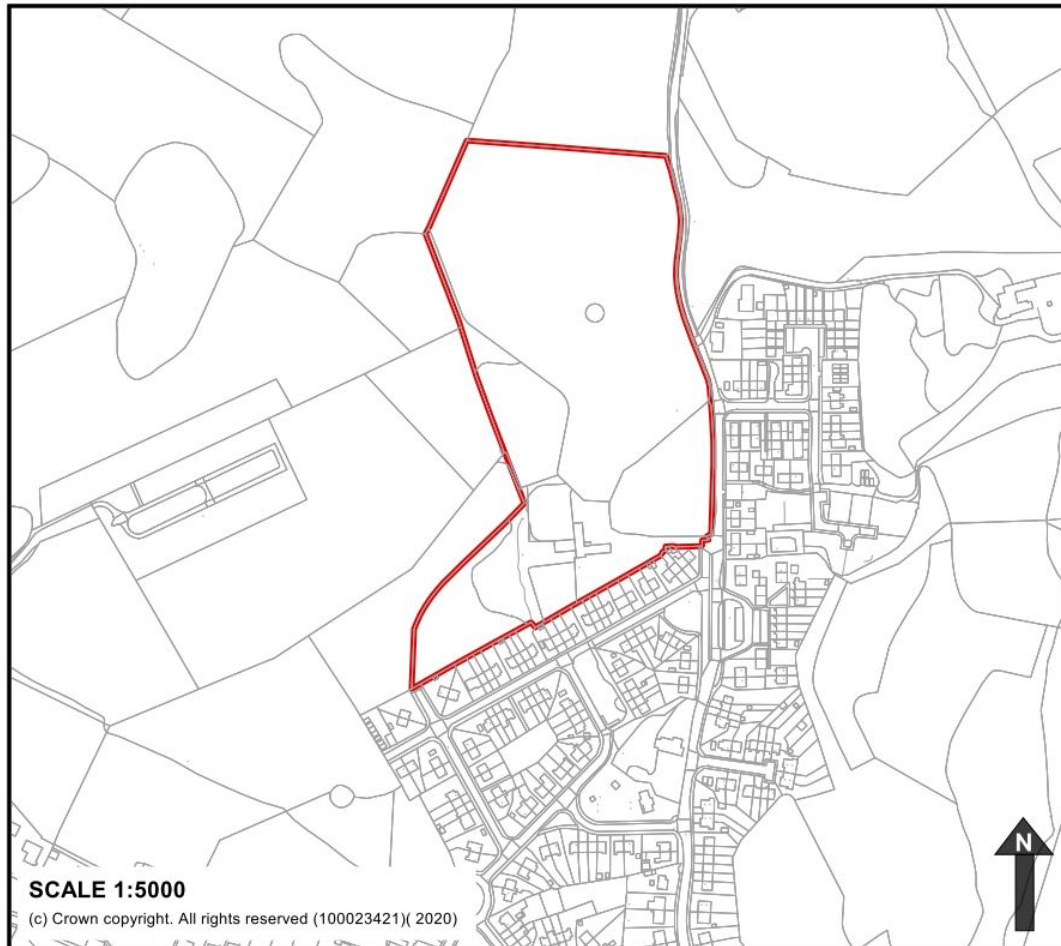
<p>In addition to any representations received from the site promoter or key agencies (see above):</p> <ul style="list-style-type: none"> • 2 representations objected to the proposal on the basis that it should remain as green belt
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Summary and conclusion

<p>The Migdale site is not known to have any significant technical constraints which would impact deliverability. Potential water and waste water network issues can be addressed at the planning application stage.</p> <p>No environmental designations cover the site and development is unlikely to have any significant environmental effects on wider natural heritage, subject to mitigation. The site's elevated and prominent location at the edge of Kilmacolm is likely to mean development would have adverse effects on local landscape character and the setting of the village. Site not within an accessible distance of a regular public transport service or everyday services in Kilmacolm.</p> <p>While the site is in a marketable area, a proven developer has not expressed interest in the proposal.</p> <p>With regard to the above and the findings of the Housing Land Technical Report 2021, it is not considered appropriate or necessary to allocate this site for housing development in the Proposed Local Development Plan.</p>
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Site Details

Site name	Planetreeyetts
Settlement	Kilmacolm
Call for Sites reference	CFS15
Site size (ha)	6.07
Current use	Agriculture
Existing LDP designation	Green Belt



Proposal

Submitted by	Taylor Wimpey (West Scotland) Ltd
Proposed Use	Residential
Number of houses/floorspace	100 homes
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p>The proposal includes 25% affordable homes, associated infrastructure, landscaping and open space. The detailed assessments set out within the supporting documents demonstrate that Planetreeyetts is best placed for much needed new housing within the village in a way that is consistent with the six key principles of successful placemaking and that would be in keeping with the village context. The proposal will positively impact on local concerns about a lack of housing mix within the village. These detailed studies, which cover a range of technical matters and site servicing issues, confirm that there are no technical or servicing reasons that would prevent the successful delivery of the development, thereby allowing the Council to pursue an allocation at Planetreeyetts with confidence of the site's suitability and deliverability. A planning application in principle for this proposal is currently pending (18/0322/IC).</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> • Design and Access Statement • PAC Report • Planning Statement • Landscape Visual Assessment • Ecology Report and Constraints Plan • Geo Tech • Drainage Strategy and Certificate • FRA and Self Certificate • Arboricultural Report • Utilities Report • Economic and Social Impact Report ink Summary Page • TA (updated) + Road Safety Audit • Housing Paper and Appendix (Housing land Supply Analysis) • Bat Surveys (Various) • MIR representation <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p><i>Flood Risk</i> – The submitted Flood Risk Assessment (FRA) found no technical issues that would prevent the successful delivery of the site. This has been confirmed by the Council and consultees. As noted in the FRA, there is the opportunity to secure the approval of the</p>

	<p>existing surface water drainage to the rear of the existing houses along the north of Quarry Drive and through this a wider community benefit can accrue.</p> <p><u>Biodiversity</u> – An Ecological Assessment found that the site is of low ecological value with an area of marshy grassland within the south east part of the site being of higher value. This ecologically rich area will be retained as open space and actively managed to deliver biodiversity enhancements. The assessment noted that a number of protected species have been recorded in the local area and identified a number of recommendations to address potential effects, including a bat survey, which was subsequently been undertaken. A 2018 Aboricultural Report found the majority of trees to be located around the site boundaries and within the south east part. These have largely been incorporated into the proposed development layout. While some trees which are more centrally located would be lost through development, a significant number are assessed to be in poor condition.</p> <p><u>Landscape</u> – The proposed development is not in a prominent location, being relatively low-lying on the lower slopes of the enclosing hills, contained by landform and woodland. It is also not considered dispersed residential development in the open countryside due to its association with the existing urban development of Kilmacolm. Development is therefore appropriate within this location and would fit best with a layout that reflects its existing sense of containment. The development proposals articulated within the Design and Access Statement have been informed by a landscape visual assessment. This includes additional tree planting and careful plotting of open space and landscaping to ensure that an appropriate masterplanned environment is created.</p>
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Planning History

Planning Applications	18/0322/IC – Proposed residential development of circa 100 units etc. Refused 28/04/2021
Previous Plan – Reporters Comments	<p>This large greenfield site is on the northern edge of Kilmacolm. It lies on the west side of Finlaystone Road. It extends from the rear of the houses on the north side of Quarry Drive, and the nearby farm buildings, to beyond the present edge of the built up area on the east side of Finlaystone Road. The site forms rising land at the upper edge of the village. It comprises prominent open farmland that I consider provides an important part of the setting of Kilmacolm. The settlement boundary here is not inappropriate at present. I find that development on the northern half of the site would represent a particularly significant extension of the built-up area into open countryside. Part of the site towards its south-west edge has been identified as comprising valuable wetland habitat. This now forms part of a new local nature conservation site which has been identified on the proposals map, and is therefore now protected under Policy 33. However this would not preclude the development of housing elsewhere on the site, subject to adequate safeguards. Development of this site would require the widening of Finlaystone Road, particularly along its northern edge where it is of single track width. Potential flooding issues would also have to be addressed, but otherwise I have not identified other infrastructure or technical constraints which would preclude its development. Being mainly within one kilometre of the centre of Kilmacolm, residents here would enjoy good access to the facilities and amenities of the village. Application of Policy 18 would ensure that 25% of the total number of</p>

	<p>houses would be for affordable housing. The land is under the control of a major house-building company, and I am satisfied that the site is capable of becoming effective and delivering house completions within the plan period.</p> <p>Overall, I do not consider that allocating this greenfield site for housing development in this plan would be justified, particularly in light of my conclusion at Issue 5, that there is no requirement at this time for any additional land to be allocated in the Kilmacolm and Quarriers Village part of Inverclyde.</p>
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Green Belt boundary issues

Robustness of existing boundary	Northern settlement boundary of Kilmacolm at this location is currently defined by rear garden boundaries of houses along Quarry Drive.
Robustness of proposed boundary	To be formed by screen planting along the northern site boundary

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	<p>Potential flood risk from a minor watercourse through site and surface water flood hazard identified. It is noted that a Flood Risk Assessment submitted in support of the proposal is acceptable to the Council and SEPA. Known hydraulic constraints within the waste water network.</p> <p>The Design and Access Statement submitted with the proposal identifies opportunities for the enhancement of the two minor watercourses, including removal of invasive species.</p>
Biodiversity	11	<p>While the south east part of the proposed site overlaps with the Planetreeyetts/ West Quarry Drive Local Nature Conservation site and includes a marshy area of high ecological value, it is noted that this area is not proposed for development. The submitted Ecological Appraisal notes that the site consists predominantly of semi-improved grassland of low ecological value with a small area of marshy grassland of higher value, which it is proposed to retain as open space. The other habitats on-site are generally widespread in the local area and of lower ecological interest.</p> <p>With regard to application 18/0322/IC, the Council's ecology advisor raised no concerns over the appraisal findings and the various mitigation and enhancement measures identified.</p>
Climatic Factors	7, 5	Car travel and associated emissions would be minimized as site within 400m of bus stop with at least 1 bus per hour between 7am and 7pm on weekdays
Air	13	Short term impacts during the construction phase, but unlikely to lead to the designation of an AQMA

Soil	13,4	No carbon rich soils or priority peatland within site. Development of greenfield development
Landscape	11	This is a reasonably prominent, open site, which helps define the landscape setting of, and characteristic approach to, Kilmacolm from the north. The development would represent a significant northward expansion, which would serve to bring development out of the relatively well-contained setting which the village currently occupies, leading to adverse impacts on the local landscape character, setting of, and approach to the existing village. The significant removal of trees, while in poor condition, would also have an adverse effect on landscape character.
Material Assets	4	Greenfield development
Cultural Heritage	10	<p>The Category B Wateryetts lies on Finlaystone Road to the south of the application site, with the Category B James Reid Headstone within Kilmacolm Cemetery lies to the west, A number of intervening dwellinghouses lie between the application site and Wateryetts, which should avoid any adverse impacts on the listed building or its setting. Whilst there will be clear views of the development from the Cemetery, the James Reid Headstone is viewed in the context of the Cemetery and development should not therefore have any impact on its setting.</p> <p>With regard to application 18/0322/IC, the Council's archaeology advisor notes that the farmstead of Planetreeyetts is depicted in historic mapping with a further farmstead (Roughbush) located to the north of Planetreeyetts and to the west of Oldhall and likely within the boundary of the site, although there is now no surface trace of it. There is the potential that both Planetreeyetts and Roughbush may have their origin in the late medieval or medieval periods. It is also noted that to the south, late medieval pottery was recovered from Kilmacolm play park in the early 1970s. Given the scale of the development and the potential for the survival of buried archaeological remains it is advised that an intrusive archaeological evaluation is undertaken.</p>
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. Site is 590m from the active travel network and within an accessible distance of local services – 660m.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Kilmacolm/Quarrier's Village LNCS Assessment Summary (2017)

Planetreeyetts includes a large low diversity, horse grazed pasture field along its eastern half, and the immediate land by the buildings is of low interest; these can be excluded from any site designation. However the marsh along its western boundary has considerable interest. This marsh is contiguous with a marshy strip (with some scrub and grassland) surveyed as part of the West Quarry site. The Planetreeyetts and West Quarry sites are closely linked and to some extent complicated by adjacent contiguous land (broad strip field) that is not included within either site boundary (but is target noted), but is integral to assessing the nature conservation interest at both sites. This mire adjacent to the site ('Spring Mire') is of very high quality, and part of a suite of such mires that are a feature of this part of the old county of Renfrewshire (e.g. Glen Moss, Shovelboard, Lawfield Dam and Dargarvel Glen – most of which are designated as SSSIs). It is a basin mire and when combined with the marshes included in parts of both of the two contiguous survey sites constitutes a site worthy of designation as an LNCS. The marshy strip extends slightly into a 'broad strip field' that is excluded from both surveys. At the western end of this strip field is a flushed slope of high diversity, but it is isolated by improved and poached pasture in the middle section of the field. It is recommended that the wetland areas have LNCS designation and the proposed site is shown on Figure 14.

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	Access to the site from Finlaystone Road. Provide pedestrian/ cycle links to Finlaystone Road. Link to Quarry Drive would be desirable. Suitable visibility should be provided at all accesses. Requires footway, street lighting and 30mph speed limit to be extended northward beyond the access point. Parking should be provided in accordance with approved parking standard. Development should include measures to reduce vehicle speeds within the site.
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	Scottish Water confirm that there is sufficient water and waste treatment work capacity to service proposed demands, but further investigations may be required to determine impacts on network capacities. No comments received from other utility providers. Submission states that there are no utility constraints to development.
Does the proposal raise any educational capacity issues?	Depending on the amount and delivery of land identified for housing in the Kilmacolm Primary School catchment, there could be potential capacity issues.

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	Yes – Taylor Wimpey Ltd
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Kilmacolm as a strong market area (2016).

If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	It is expected that the site could deliver some housing by 2024 and remainder by 2032.
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Key Agency Comments

HES	No comment
NatureScot	<p>This is a reasonably prominent, open site, which helps define the landscape setting of and characteristic approach to Kilmacolm from the north. Key views to the south are afforded over the site from Finlaystone Road.</p> <p>Development of the whole of this site would represent a significant northward expansion, which would serve to bring development out of the relatively well-contained setting which the village currently occupies, leading to adverse impacts on the local landscape character, setting of, and approach to the existing village. There might be some landscape capacity in the southern part of the site, which is lower lying and more clearly relates to the existing settlement. Further more detailed study would be required to identify capacity and necessary siting, design, and mitigation measures. Areas of semi-natural woodland should be retained and incorporated into the design of the development, contributing to the landscape framework.</p>
Scottish Forestry	Mature tree found in the central circle marked on map. Few trees bordering this site.
SEPA	<p>Flood risk - Minor watercourse/drain flows through allocation and potential flood risk from this source should be taken cognisance of. A basic FRA, consisting of topographic information in the first instance and a detailed layout plan will be required. A surface water flood hazard has been identified and should be discussed with FRMA and Scottish Water. Appropriate surface water management measures should be adopted.</p> <p>Water Environment – No comment</p>
Scottish Water	<p>There is sufficient water and waste water treatment works capacity to service proposed demands.</p> <p>Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any, this development has on the existing water treatment network.</p> <p>As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under Climatic factors topic in the SEA summary.
Transport Scotland	No comment

Other comments received to MIR consultation

In addition to any representations received from the site promoter or key agencies (see above):

- 86 representations objected to the proposal on a wide range of grounds, including loss of green belt, potential for development to increase pressure for further green belt development, adverse effects on landscape character and setting, loss of a valued recreational and ecologically rich area, adverse effects relating to increased traffic (i.e. safety, noise/air pollution), insufficient infrastructure (i.e. roads, local services, schools etc.); loss of outlook / views. No established need for further housing in Kilmacolm and availability of many brownfield sites in Inverclyde.
- 1 representation supported the proposal if a housing need is proven

Summary and conclusion

The Planetreeyetts site is not known to have any significant technical constraints which would impact deliverability. Flood risk and potential water and waste water network issues can be addressed at the detailed planning application stage.

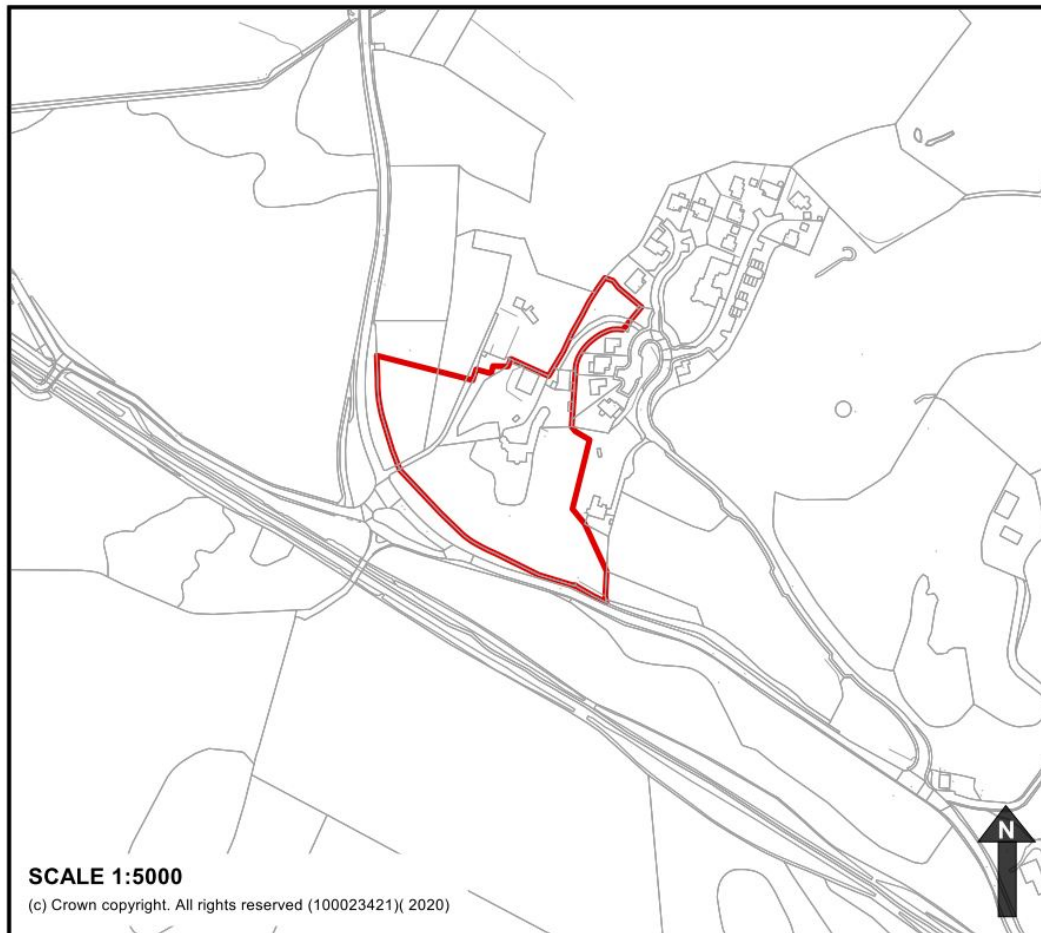
While part of a Local Nature Conservation Site is within the development site boundary, it is outwith the proposed developable area. Development unlikely to have any significant environmental effects on wider natural heritage, subject to proposed mitigation. Development would have significant adverse effects on the quality, character, landscape setting and identity of the village, particularly through the northwards expansion beyond the existing village. Site within an accessible distance of a regular public transport service and everyday services in Kilmacolm.

The site is in a marketable area and a house builder is attached to the proposal.

With regard to the above and the findings of the Housing Land Technical Report 2021, it is not considered appropriate or necessary to allocate this site for housing development in the Proposed Local Development Plan.

Site Details

Site name	Stables Wood
Settlement	Kilmacolm
Call for Sites reference	CFS16
Site size (ha)	2.21
Current use	Garden ground/woodland
Existing LDP designation	Green Belt



Proposal

Submitted by	Named individual
Proposed Use	Residential
Number of houses/floorspace	5
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p>Proposal for 5 detached high value dwellings on three distinct pieces of ground in the curtilage of The Stables. The individual sites are identified as Sites A, B, and C on the location plan, with site A proposed for 3 dwellings and Sites B and C consisting of single house plots. Site</p> <p>Stables Wood is ideally suited to help meeting the identified housing shortfall because (1) the site can be sensitively developed whilst retaining its woodland character and responding positively to environmental designations (2) new dwellings can be screened from the adjacent main road and designed to respond to the topography (3) the site will contribute high value, prestigious, low density detached dwelling plots within a highly marketable area. This will respond to Inverclyde's perceived lack of upmarket house plots (3) the site will have a minimal impact on the settlement boundary, being immediately adjacent to an existing development of upmarket homes and within the garden ground of "The Stables" and (4) the site is immediately adjacent to the main A761 Port Glasgow Road and has excellent vehicular and pedestrian links to Kilmacolm and the wider area. Space exists to provide a footway linking the site to the footpath network of Kilmacolm. Utility connections available from Auchenbothie.</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> • Supporting Statement <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p><i>Biodiversity/Landscape</i> – Although removal of some semi mature woodland is inevitable, this will be carefully managed to promote the long term sustainability and improvement of the remainder of the woodland. If developed sensitively the woodland could be used to mitigate the impact of the development on the local landscape.</p> <p><i>Climatic Factors</i> – Electric charging points for cars will be provided within the site to offset increased car journeys caused by the development.</p>

Planning History

Planning Applications	No recent applications
Previous Plan – Reporters Comments	n/a

Green Belt boundary issues

Robustness of existing boundary	n/a – Site sits within green belt, some distance from the existing green belt/settlement boundary.
Robustness of proposed boundary	n/a – If developed, site would remain within the green belt.

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Potential flood risk identified. Known hydraulic constraints within the waste water network.
Biodiversity	11	Significant adverse effects on Auchenbothie Burn, Windmill Wood, Auchenbothie Wood Local Nature Conservation site, which overlap with the southern part of the proposed site, and on semi-natural woodland which covers majority of the site. It is considered that the low density of housing proposed would not sufficiently mitigate the identified impacts. Potential for protected species to be present on site.
Climatic Factors	7, 5	Likely to increase car travel and associated emissions as site not accessible to public transport provision.
Air	13	Short term impacts during the construction phase, but unlikely to lead to the designation of an AQMA
Soil	13,4	No carbon rich soils or priority peatland within site. Development of greenfield land
Landscape	11	Significant adverse effects on local landscape character and setting through the removal of semi-natural woodland and the location of development in an isolated part of the green belt.
Material Assets	4	Development of greenfield land
Cultural Heritage	10	Not in close proximity to any designated cultural heritage assets
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. Site 290m from active travel network and not within accessible distance of local services – 1160m.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	No

4	Will the proposal support any Town Centre and Priority Place regeneration priorities?	No
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Kilmacolm/Quarrier's Village LNCS Assessment Summary (2017)

<p>Stables Wood is small and somewhat mixed site, but with little evidence of it being old woodland. In isolation it does not merit consideration, but it is contiguous with woodlands linked to the Auchenbothie Wood LNCS. There is good bat foraging habitat and potential roost trees. Therefore there is potential for retention of parts and sympathetic woodland management during any developments. It is proposed it becomes part of the existing Auchenbothie Burn/Windmill Wood/Auchenbothie Wood LNCS. It is also proposed that the adjacent Craigmarloch Marsh is included within this boundary. This sedge bed, rushy area and marshy fields have breeding Water Rail, Reed Bunting, Sedge Warbler, Grasshopper Warbler and Lapwing. When flooded in winter Whooper Swans and other wildfowl have been recorded using it. The proposed LNCS boundary is shown on Figure 13.</p>

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	<p>No access to be taken from Port Glasgow Road.</p> <p>Preferred access from Auchenbothie Gardens.</p> <p>Provide pedestrian link to Auchenbothie Gardens.</p> <p>Suitable visibility should be provided at all accesses.</p> <p>Parking should be provided in accordance with approved parking standard.</p> <p>Development should include measures to reduce vehicle speeds within the site.</p>
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	<p>Scottish Water confirm that there is sufficient water and waste treatment work capacity to service proposed demands, but further investigations may be required to determine impacts on network capacities.</p> <p>No comments received from other utility providers.</p>
Does the proposal raise any educational capacity issues?	Depending on the amount and delivery of land identified for housing in the Kilmacolm Primary School catchment, there could be potential capacity issues.

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	No
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Kilmacolm as a strong market area (2016).

If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	Submission indicates site available for immediate progress
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Key Agency Comments

HES	No comment
NatureScot	The majority of this site is covered by semi-natural woodland. Removal of the woodland would have an adverse impact on the local landscape character and setting.
Scottish Forestry	Kay Woods is within an NFI Broadleaved woodland, 70% Canopy cover, No 5 canopy structure, NWSS Native woodland 100% Native species, NWSS Maturity – Mixed, NWSS Habitat- Lowland mixed deciduous woodland NWSS Herbivore impact Medium. Stable woods has 70% Canopy cover also of broadleaves.
SEPA	Flood risk - No flood risk apparent Water environment - The location is at the edge of the sewer catchment, connection to public foul sewer should be required
Scottish Water	There is sufficient water and waste water treatment works capacity to service proposed demands. Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any this development has on the existing water treatment network. As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.
Sportscotland	No comment
SPT	Public transport accessibility information provided under Climatic factors topic in the SEA summary.
Transport Scotland	No comment

Other comments received to MIR consultation

<p>In addition to any representations received from the site promoter or key agencies (see above):</p> <ul style="list-style-type: none"> 2 representations objected to the proposal on the basis that it should remain as green belt
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Summary and conclusion

The Stables Wood site is not known to have any significant technical constraints which would impact deliverability. Flood risk and potential water and waste water network issues can be addressed at the planning application stage.

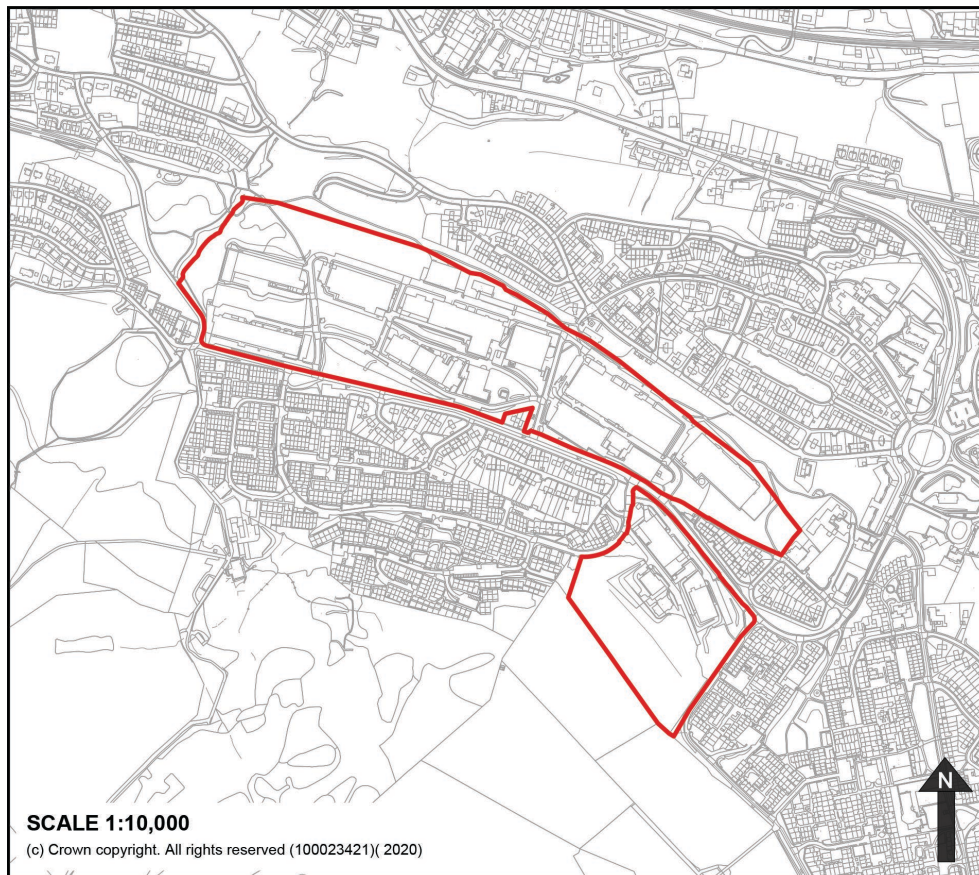
Development would have significant adverse effects on a LNCS and an area of semi-natural woodland which overlap part of the site. There would also be adverse effects on local landscape character and setting through the removal of woodland and the extension of isolated development in the greenbelt. Site not within an accessible distance of a regular public transport service or everyday services in Kilmacolm.

While the site is in a marketable area, a proven developer has not expressed interest in the proposal.

With regard to the above and the findings of the Housing Land Technical Report 2021, it is not considered appropriate or necessary to allocate this site for housing development in the Proposed Local Development Plan.

Site Details

Site name	Port Glasgow Industrial Estate
Settlement	Port Glasgow
Call for Sites reference	CFS18-21
Site size (ha)	31.01
Current use	Business and industrial, open space, agriculture.
Existing LDP designation	Safeguarded business and industrial area, residential area, open space, green belt



Proposal

Submitted by	Glasgow Industrial Estate Group (McLaren Packaging Limited, @Sipp Pension Trustees Ltd and Aquatron Properties Limited).
Proposed Use	Masterplan led development, including residential and business and industrial uses
Number of houses/floorspace	Approx. 500 homes, with an overall area of 7.98ha proposed for the retention, regeneration or creation of economic/commercial uses
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p>Due to the estate being in poor condition, with several burned out and semi-derelict buildings, there is a need to make it more attractive to potential users and to secure the existing employers within it. While the proposal will largely retain existing and operational industrial and business, to enable further development of industrial units, including replacement of existing units in disrepair, enabling residential development is proposed on land to the south of Dubbs Road (south eastern part of the Estate) and land to the north and north west of Gareloch Road (north west corner of site). The rationalisation of the estate will help to retain the existing businesses currently operating from the Estate and the 350 jobs that the Estate currently supports. The site is already provided with all necessary utility connections.</p> <p>An Indicative Development Framework evidences the suitability of the Industrial Estate for redevelopment and an appraisal of the existing Industrial Estate confirming that there are no constraints that would prevent the proposed redevelopment.</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> • MIR representation • Site Location Plan • Site Boundary Plan • Site Context Plan • Site Analysis Plan • Sustainability of Location Plan • LDP Context Plan • Indicative Development Framework <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p><i>Flood Risk</i> –Pockets of the estate are identified as being at risk of fluvial flooding. A future planning application will be supported by a Drainage Strategy which will include the provision of a SuDS Strategy that will ensure that surface water drainage will be within greenfield rates.</p> <p><i>Biodiversity</i> –The site’s existing industrial use and urban location means that there are unlikely to be any species present on the site. An Ecological Assessment, including a Phase 1 Habitat Survey, will be prepared to ensure any impacts on the natural environment are mitigated.</p>

	<p><i>Soil/Material Assets</i> – The proposal is for the redevelopment of brownfield land and will not result in the loss of any prime agricultural land. The redevelopment of the site can address any issues of contaminated land, should any be discovered following the undertaken of a site investigation.</p> <p><i>Landscape</i> – The proposal will have a positive impact upon the surrounding landscape setting. The redevelopment of the Industrial Estate will remove any derelict buildings and provide opportunities for the construction of modern replacement industrial units. A future masterplan for the site will incorporate areas of open space and landscaping that will further improve the landscape setting of the Industrial Estate.</p> <p><i>Population and Health</i> – A future masterplan for the site will include areas of open space and new pedestrian links, combined with links into the adjacent Core Path Network and NCR 75.</p> <p><i>Housebuilder interest</i> – The owners of the Estate intend to engage in a marketing exercise (to seek developer interest) in advance of any consultation on the next stages of the emerging Local Development Plan 3</p>
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Planning History

Planning Applications	No recent applications
Previous Plan – Reporters Comments	<p>(Comments relate to that part of the site allocated for residential development in the previous LDP).</p> <p>This is a large site of approximately 5 hectares within an existing industrial estate, lying to the south of Port Glasgow. It is a brownfield site with vacant buildings and associated hardstanding. All buildings are in a state of disrepair with no signs of activity that I observed. The site forms the eastern end of the industrial estate and is bounded by Gareloch Road, Dubbs Road and Knocknair Street. The remainder of the industrial estate lies to the west, with further industrial development to the east. Established residential areas lie to the north and south. Two representations have raised issues of negative impacts on residential amenity and traffic safety in association with the proposed allocation of the site for 200 homes, and also the potential impact on the remaining part of the industrial estate. At present, the details of the layout and design of any development at Dubbs Road are not known. The interaction of the existing industrial uses and new residents is an issue that would be carefully assessed at the development management stage. Solutions for any potential traffic impacts on the road network would also be assessed in full at that stage, although I note that the council's Road Service did not raise any significant concerns regarding additional traffic. Policy 18 – New Housing Development confirms that Supplementary Guidance will be prepared by the council and will be used to assess development proposals. This site is included in Schedule 3 of this plan as a new private housing development opportunity site, and so a development brief will be required to be prepared. I also find that Policy 20- Residential Areas would ensure that proposals for development would be assessed with regard to the impact on the amenity, character</p>

	and appearance of the area, including any traffic impacts. The impact on existing homes would have to be acceptable. There would be opportunities for participation in the development management process once a planning application is submitted and I am satisfied that this would be the most appropriate point in the planning process to consider such potential impacts. I conclude that the inclusion of the site at Dubbs Road as a new private housing development opportunity site for 200 homes is appropriate and that no modification to the plan is required.
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Green Belt boundary issues

Robustness of existing boundary	Majority of site bounded by extent of built development. South east part of site bounded by a steep slope.
Robustness of proposed boundary	To be formed by structural planting.

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Potential flood risk from possible culverted watercourse through site. Surface water flood hazard identified. Known hydraulic constraints within the waste water network.
Biodiversity	11	Potential for adverse effect on small pockets of semi-natural woodland within the site. Impact on protected species within greenfield area not known.
Climatic Factors	7, 5	Car travel and associated emissions will be minimized as site within 400m of bus stop with at least 1 bus per hour between 7am and 7pm on weekdays
Air	13	Short term impacts during the construction phase, but unlikely to lead to the designation of an AQMA
Soil	13,4	No carbon rich soils or priority peatland within site. Development of brownfield/greenfield land. Potentially contaminated site.
Landscape	11	Potential for adverse effects as south east part of site is steeply sloping. A comprehensive masterplan led redevelopment of this site, which includes vacant and derelict buildings, is likely to have a positive effect on the local urban landscape.
Material Assets	4	Development of brownfield/greenfield land
Cultural Heritage	10	Not in close proximity to any designated cultural heritage assets
Population and Health	5, 8, 13	While development would result in a significant loss of existing green infrastructure, specifically the area of open space in the north west part of site, the sloping nature of this space means that it has limited functionality. Noting that there is also considerable open space provision in proximity of the site, it is considered that the loss of existing open space could be mitigated by the enhancements

		to other open spaces within the site, as proposed in the indicative layout. In addition, while not identified in the proposed layout, there is scope to incorporate new open space and wider green infrastructure provision into the development. Opportunities to link with adjacent active travel network. Site within an accessible distance of local services – 583m.
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SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	Yes – The proposed site is designated as a Priority Place in the Proposed Plan

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	<p>Main access from Dubbs Road using existing junctions with Knocknair Street and Gareloch Road.</p> <p>Main access from Dubbs Road and potential new section of road linking Montrose Avenue and Muirdykes Avenue.</p> <p>Provide pedestrian links to neighbouring residential estates.</p> <p>Provide cycle links through the development from Devol to the N75 Cycle Route.</p> <p>Suitable visibility should be provided at all accesses.</p> <p>Provide pedestrian links to bus stops on Dubbs Road, Boglestone Avenue and Ardmore Road.</p> <p>Provide pedestrian links to bus stops on Dubbs Road, Boglestone Avenue and Ardmore Road.</p> <p>Parking should be provided in accordance with approved parking standard.</p> <p>Development should include measures to reduce vehicle speeds within the site.</p> <p>Street lighting to be provided throughout site.</p>
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	<p>Scottish Water confirm that there is sufficient water capacity to service proposed demand, but limited waste water treatment capacity. Further investigations may be required to determine impacts on network capacities.</p> <p>No comments received from other utility providers.</p>
Does the proposal raise any educational capacity issues?	None identified

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	None identified
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Inverclyde East as a poor market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	There could be limited development in the masterplan area before 2024, but majority of units would be programmed for 2024-2032 period.

Key Agency Comments

HES	No comment
NatureScot	No comment
Scottish Forestry	Several broadleaved trees found on site. NFI mixed mainly conifer woodland on the north west of the site, NFI mixed mainly broadleaved on the far south east of the site with 80% canopy cover, NWSS Canopy structure number 2, NWSS Habitat - Wet Woodland, NWSS Herbivore Impact - Medium, NWSS Type - Native Woodland, NWSS Maturity - Young, NWSS Nativeness - 100%
SEPA	<p>Flood Risk - A minor watercourse flows along the site boundary which could represent a potential flood risk. A basic FRA, consisting of topographic information in the first instance and a detailed layout plan will be required. A surface water flood hazard has been identified and should be discussed with FRMA and Scottish Water. Appropriate surface water management measures should be adopted.</p> <p>Water Environment - 10m buffer should be maintained from the development to the watercourse (western part of site)</p>
Scottish Water	<p>There is sufficient water treatment works capacity to service proposed demands. Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any, this development has on the existing water treatment network.</p> <p>Inverclyde PFI Treatment works has limited capacity for domestic sites and if any developers are proposing trade-effluent here they would need to work very closely on Scottish Water on this. Please see Scottish Water's advice for Growth Criteria and the Pre-Development Enquiry process. Please advise developers to submit pre-development enquiries as early as possible to start initial site assessments including flow rate assessments and discussions of trade effluent qualities and quantities. As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>Near-by watercourse should support a surface water solution - please see Scottish Water advice and policy on Surface Water.</p> <p>There is a 150mm combined foul pipe, a 225 mm surface water pipe and a water distribution main within the boundary of the site - please see Scottish Water advice on infrastructure conflicts.</p>

Sportscotland	No comment
SPT	Public transport accessibility information provided under Climatic factors topic in the SEA summary.
Transport Scotland	No comment

Other comments received to MIR consultation

In addition to any representations received from the site promoter or key agencies (see above):

- 3 representations supported the proposal
- 1 representation supported residential development
- 1 representation stated that a site on Selkirk Road should be added to the masterplan area

Summary and conclusion

The Port Glasgow Industrial Estate site is not known to have any significant technical constraints which would impact deliverability. Flood risk and potential water and waste water network issues can be addressed at the planning application stage.

Development is unlikely to have any significant effects on natural heritage, subject to appropriate mitigation. Development of the greenfield area within the south east of the site will, subject to careful design, strengthen the urban form, while structural planting will prevent pressure for further development in the green belt.

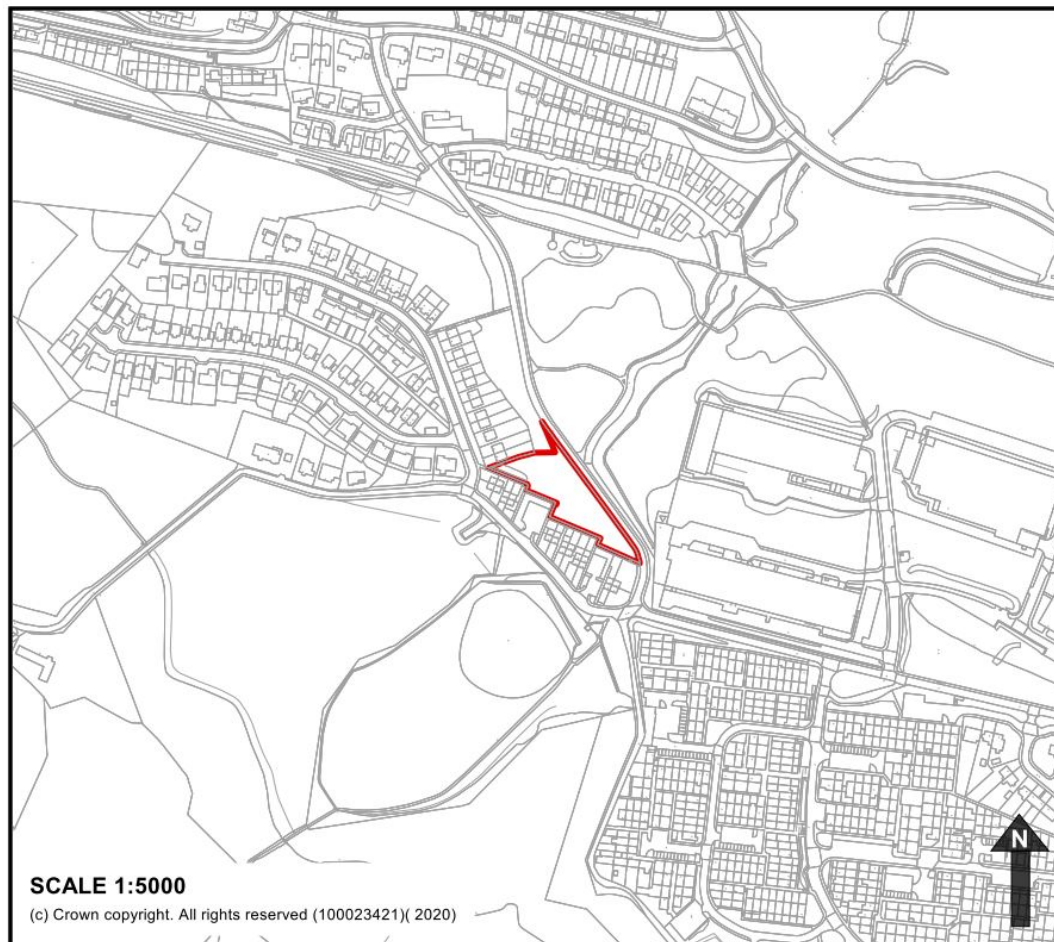
Site is within an accessible distance of a regular public transport services and everyday services at Dubbs Road local centre, while also being adjacent to the active travel network.

The site is in an area considered by Homes for Scotland to have a poor market and a proven developer has not expressed interest in the proposal. While the proposed masterplan approach will help to address this, delivery before 2024 will be limited.

With regard to the above assessment, it is considered that the consolidation of business/industrial uses in Port Glasgow Industrial Estate and the identification of surplus land for residential development offers an appropriate and sustainable future for the area. The site is therefore included as a Priority Place in the Proposed Plan, with support for the proposed uses.

Site Details

Site name	Barr's Brae (south)
Settlement	Port Glasgow
Call for Sites reference	CFS22
Site size (ha)	0.33
Current use	Vacant land
Existing LDP designation	Residential Area



Proposal

Submitted by	DM Hall
Proposed Use	Residential
Number of houses/floorspace	8 houses
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p>Planning permission previously granted for 8 dwellings on the site (ref: 11/0074/IC). There are no known constraints affecting the site, which is approx. 400m to nearest bus stop, 960m to nearest train station, adjacent to the active travel network and 670 metres to Port Glasgow town centre. All utility services are available on Knockbuckle Road. The site owner is currently discussing sale to developer.</p> <p><u>Supporting Documents</u></p> <p>None</p> <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p>None</p>

Planning History

Planning Applications	11/0074/IC - Planning application for 8 houses. Approved on 2/6/2011
Previous Plan - Reporters Comments	n/a

Green Belt boundary issues

Robustness of existing boundary	n/a
Robustness of proposed boundary	n/a

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Potential flood risk from watercourse along site boundary. Surface water flood hazard identified on small part of site. Known hydraulic constraints within the waste water network.
Biodiversity	11	No environmental designations within or in close proximity to site, but there are a few trees. Impact on protected species not known.

Climatic Factors	7, 5	Car travel and associated emissions would be minimised as the site is within 400m of bus stop with at least 1 bus per hour between 7am and 7pm on weekdays
Air	13	Short term adverse impact during construction phase, but unlikely to lead to the designation of an AQMA.
Soil	13,4	No carbon rich soils or priority peatland within site. Development of greenfield land
Landscape	11	Potential for adverse effects as site is open and steeply sloping.
Material Assets	4	Greenfield development
Cultural Heritage	10	Not in close proximity to any designated cultural heritage assets.
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. Opportunities to link with adjacent core path network. Site within an accessible distance to local services – 720m.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	<p>Suitable access and visibility should be provided.</p> <p>No direct access to individual properties from Barrs Brae.</p> <p>Parking should be provided in accordance with approved parking standard.</p> <p>Development should include measures to reduce vehicle speeds within the site.</p> <p>Street lighting to be provided throughout site.</p> <p>Site is steep and may not be able to achieve suitable access to higher section of the site.</p>
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	<p>Scottish Water confirm that there is sufficient water capacity to service proposed demand, but limited waste water treatment capacity. Further investigations may be required to determine impacts on network capacities.</p> <p>No comments received from other utility providers.</p>

Does the proposal raise any educational capacity issues?	None identified
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Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	None identified. Submission indicates site owner discussing site with unnamed developer
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Inverclyde East as a poor market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	No

Key Agency Comments

HES	No comment
NatureScot	The site is an open, steeply sloping and challenging site: siting, design, and mitigation measures should be further considered and usefully set out in a development brief.
Scottish Forestry	Few trees found on site
SEPA	<p>Flood Risk - A minor watercourse flows along the site boundary which could represent a potential flood risk. A basic FRA, consisting of topographic information in the first instance and a detailed layout plan will be required. A surface water flood hazard has been identified and should be discussed with FRMA and Scottish Water. Appropriate surface water management measures should be adopted.</p> <p>Water Environment – No comment</p>
Scottish Water	<p>There is sufficient water treatment works capacity to service proposed demands. Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any, this development has on the existing water treatment network.</p> <p>Inverclyde PFI Treatment works has limited capacity for domestic sites and if any developers are proposing trade-effluent here they would need to work very closely on Scottish Water on this. Please see Scottish Water's advice for Growth Criteria and the Pre-Development Enquiry process. Please advise developers to submit pre-development enquiries as early as possible to start initial site assessments including flow rate assessments and discussions of trade effluent qualities and quantities. As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>Near-by watercourse should support a surface water solution - please see Scottish Water advice and policy on Surface Water.</p>

	There is a 225mm surface water pipe and a 225 mm foul drainage pipe within the boundary of the site –please see the Scottish Water advice on infrastructure conflicts.
Sportscotland	No comment
SPT	Public transport accessibility information provided under ‘Climatic factors’ topic in the sustainability assessment.
Transport Scotland	No comment

Other comments received to MIR consultation

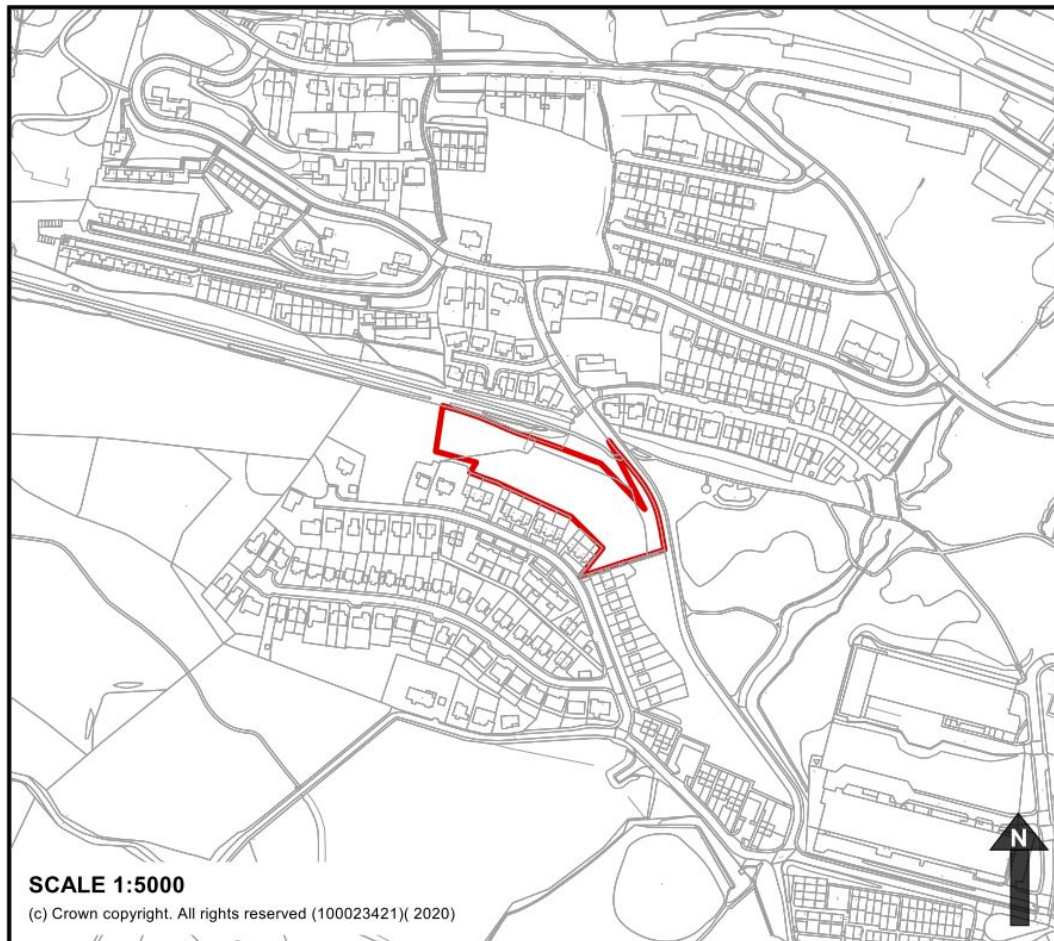
No other comments received.

Summary and conclusion

<p>The sloping nature of the Barr’s Brae (south) site makes it challenging to develop. Flood risk and potential water and waste water network issues can be addressed at the planning application stage.</p> <p>While no environmental designations cover the site, there is potential for adverse effects on the local landscape due to the open and steeply sloping nature of the site. Site is within an accessible distance of a regular public transport service and everyday services in Port Glasgow town centre and adjacent to the active travel network.</p> <p>The site is in an area considered by Homes for Scotland to have a poor market and a proven developer has not expressed interest in the proposal.</p> <p>With regard to the above and the findings of the Housing Land Technical Report 2021, it is not considered appropriate or necessary to allocate this site for housing development in the Proposed Local Development Plan.</p>
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Site Details

Site name	Barr's Brae (north)
Settlement	Port Glasgow
Call for Sites reference	CFS23
Site size (ha)	0.85
Current use	Woodland
Existing LDP designation	Open space



Proposal

Submitted by	DM Hall
Proposed Use	Residential
Number of houses/floorspace	14 houses
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p>The proposal reflects previous planning applications for residential development, most recently application ref: 13/0038/IC. The site is approx. 80m from the core path network, 570m to nearest bus stop, 900m to nearest railway station and 900m to Port Glasgow town centre. There are no known constraints affecting the site, which has utility connections available. The site owner is discussing site with a developer.</p> <p><u>Supporting Documents</u></p> <p>None</p> <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p><i>Biodiversity</i> – None of any note</p> <p><i>Landscape</i> – Site of little landscape interest</p>

Planning History

Planning Applications	13/0038/IC - Planning application for 14 houses. Refused on 28/03/2013.
Previous Plan – Reporters Comments	n/a

Green Belt boundary issues

Robustness of existing boundary	n/a
Robustness of proposed boundary	n/a

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Potential flood risk from possible culverted watercourse through site and surface water flood hazard identified. Known hydraulic constraints within the waste water network
Biodiversity	11	No environmental designations within or in close proximity to the site. Development would result in the loss of a significant area of native woodland, which covers approx. 50% of the site and contributes to an established habitat corridor/green network. Impact on protected species not known.
Climatic Factors	7, 5	Car travel and associated emissions would be minimised as the site is within 400m of bus stop with at least 1 bus per hour between 7am and 7pm on weekdays.
Air	13	Short term adverse impact during construction phase, but unlikely to lead to the designation of an AQMA.
Soil	13,4	No carbon rich soils or priority peatland within site. Development of greenfield land
Landscape	11	Significant adverse impacts on local landscape character and setting as the site is steeply sloping and development would remove significant area of woodland.
Material Assets	4	Greenfield development
Cultural Heritage	10	Not in close proximity to any designated cultural heritage assets
Population and Health	5, 8, 13	Development would result in the loss of existing valuable open space which is safeguarded in the current LDP. This loss would not be off-set by a contribution to new open space provision. Opportunities to link with adjacent to active travel network. Site within an accessible distance of local services – 556m.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	Suitable access and visibility should be provided. No direct access to individual properties from Barrs Brae. Parking should be provided in accordance with approved parking standard. Development should include measures to reduce vehicle speeds within the site. Street lighting to be provided throughout site. Site is steep and may not be able to achieve suitable access to higher section of the site.
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	Scottish Water confirm that there is sufficient water capacity to service proposed demand, but limited waste water treatment capacity. Further investigations may be required to determine impacts on network capacities. No comments received from other utility providers.
Does the proposal raise any educational capacity issues?	None identified

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	None identified. Submission indicates site owner discussing site with unnamed developer
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Inverclyde East as a poor market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	No

Key Agency Comments

HES	No comment
NatureScot	This is a steeply sloping site which forms an established habitat corridor / green network and provides landscape setting. The majority of the site is identified as semi-natural woodland. Development of this site would require significant woodland removal and would have a significant and adverse impact on local landscape character and on landscape setting.
Scottish Forestry	NFI Broadleaved woodland found, NWSS Canopy Cover - 80%, NWSS Canopy Structures -5, NWSS Habitat - Upland Birch, NWSS Herbivore Impact - Medium, NWSS Type - Native Woodland, NWSS Maturity - Mixed, NWSS Nativeness 100%
SEPA	Flood Risk - A potentially culverted watercourse could flow through part of the site which could represent a potential flood risk. No built development should be proposed over the culvert. A basic FRA, consisting of topographic information in the first instance and a detailed layout

	<p>plan will be required. A surface water flood hazard has been identified and should be discussed with FRMA and Scottish Water. Appropriate surface water management measures should be adopted.</p> <p>Water Environment - No comment</p>
Scottish Water	<p>There is sufficient water treatment works capacity to service proposed demands. Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any, this development has on the existing water treatment network.</p> <p>Inverclyde PFI Treatment works has limited capacity for domestic sites and if any developers are proposing trade-effluent here they would need to work very closely on Scottish Water on this. Please see Scottish Water's advice for Growth Criteria and the Pre-Development Enquiry process. Please advise developers to submit pre-development enquiries as early as possible to start initial site assessments including flow rate assessments and discussions of trade effluent qualities and quantities. As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>Near-by watercourse should support a surface water solution - please see Scottish Water advice and policy on Surface Water.</p> <p>There is a 225mm surface water pipe and a 225 mm foul drainage pipe within the boundary of the site -please see the Scottish Water advice on infrastructure conflicts.</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under 'Climatic factors' topic in the sustainability assessment.
Transport Scotland	No comment

Other comments received to MIR consultation

No other comments received.

Summary and conclusion

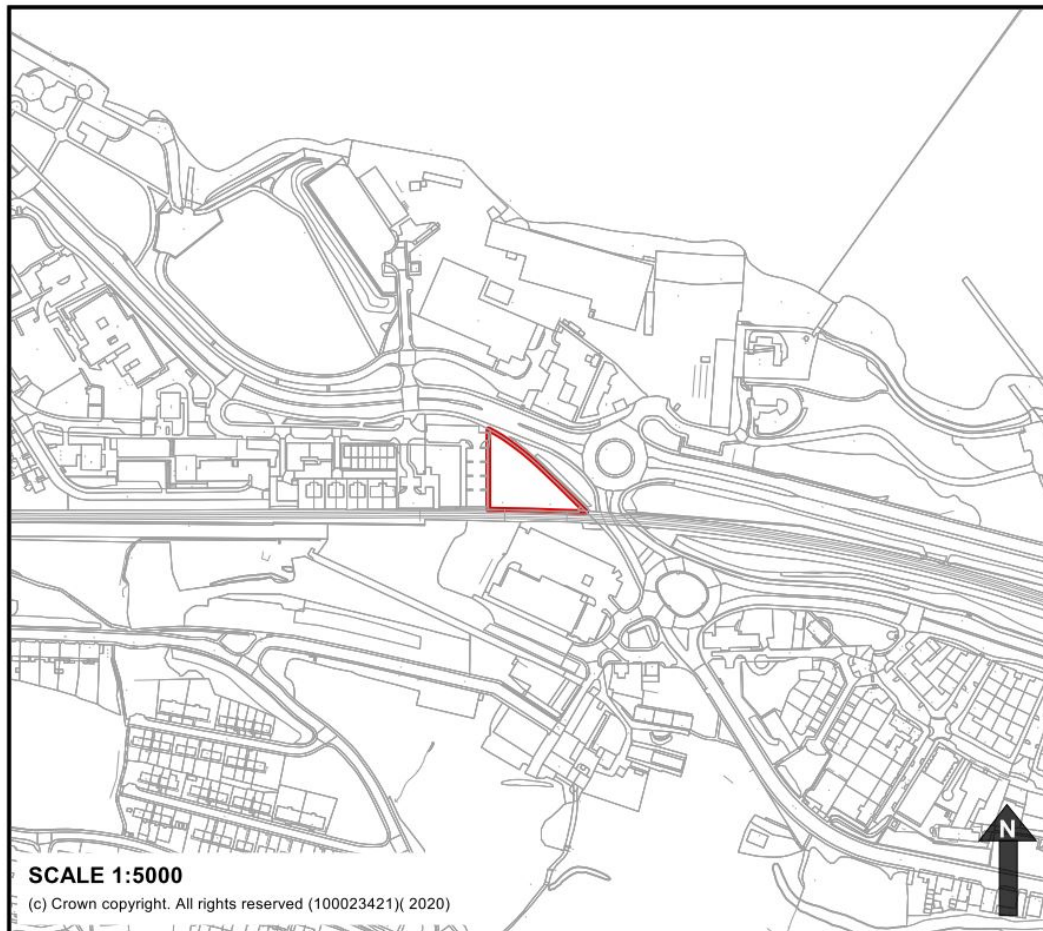
<p>The sloping nature of the Barr's Brae (north) site would make it challenging to develop. Flood risk and potential water and waste water network issues can be addressed at the planning application stage.</p> <p>Development would have significant adverse effects on biodiversity and landscape due to the sloping nature of the site and the need to remove a significant area of semi-natural woodland. Development would also result in the loss of valued open space which is identified and safeguarded as such in the LDP. Site is within an accessible distance of a regular public transport service and everyday services in Port Glasgow town centre. It is also adjacent to the active travel network.</p>

The site is in an area considered by Homes for Scotland to have a poor market and a proven developer has not expressed interest in the proposal.

With regard to the above and the findings of the Housing Land Technical Report 2021, it is not considered appropriate or necessary to allocate this site for housing development in the Proposed Local Development Plan.

Site Details

Site name	Bay Street
Settlement	Port Glasgow
Call for Sites reference	CFS24
Site size (ha)	0.26
Current use	Vacant site
Existing LDP designation	N/a



Proposal

Submitted by	Bruach Design and Consultancy Ltd on behalf of Advance Construction (Scotland) Ltd
Proposed Use	Residential
Number of houses/floorspace	28 flats
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p>Proposal for a single four storey common close block primarily aimed towards elderly and amenity residents, which the site is well served for due to its close proximity to the town centre, public transport links and the active travel network. Redevelopment of this derelict site would improve the landscape and outlook for surrounding residents, which in turn would have a positive effect on health and well-being. Development would also improve the view of the site as observed from Greenock Road. The creation of new purpose built elderly housing would also potentially help to free up larger housing that exists elsewhere in Inverclyde for younger people. All utilities are within the vicinity of the site and capacity is available. While there is an existing burial site within the site boundary, there are proposals in place for the exhumation process which have been forwarded to Inverclyde Planning for review. There is evidence of housing demand in the area. A planning application is pending for this proposal (ref: 20/0054/IC)</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> MIR representation <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p><i>Cultural Heritage</i> - The proposed building would be a maximum of 4 storeys high to reduce the impact on the view of the adjacent A-Listed Ropeworks building. This would allow The Ropeworks to retain its status as the key gateway building that is viewed on entering Port Glasgow Town Centre. Materials would be chosen to compliment the adjacent building and also to tie in with the recent development to the west of The Ropeworks, to ensure that the new development beds well into the setting.</p>

Planning History

Planning Applications	20/0054/IC - Planning application for 4 storey flatted development. Withdrawn on 1/3/2021.
Previous Plan - Reporters Comments	n/a

Green Belt boundary issues

Robustness of existing boundary	n/a
Robustness of proposed boundary	n/a

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Area of medium/high coastal flood risk and surface water flood hazard identified. Potential flood risk from possible culverted watercourse through site. Known hydraulic constraints within the waste water network.
Biodiversity	11	There are a few trees on site.
Climatic Factors	7, 5	Car travel and associated emissions would be minimised as the site is within 400m of bus stop with at least 6 buses per hour between 7am and 7pm on weekdays. Also within 800m of a train station.
Air	13	Short term adverse impact during construction phase, but unlikely to lead to the designation of an AQMA.
Soil	13,4	No carbon rich soils or priority peatland within site. Redevelopment of brownfield land. Potentially contaminated site
Landscape	11	Redevelopment of this vacant brownfield site could have a positive effect on the local urban landscape
Material Assets	4	Redevelopment of brownfield land
Cultural Heritage	10	Potential for adverse effects as site adjacent to A listed Gourock Ropeworks.
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. Opportunities to link with adjacent core path network. Site within an accessible distance to local services – 390m.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	Access from Bay street is acceptable. The site should accommodate a 3m wide cycle track.

	Parking should be provided in accordance with approved parking standard.
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	Scottish Water confirm that there is sufficient water capacity to service proposed demand, but limited waste water treatment capacity. Further investigations may be required to determine impacts on network capacities. No comments received from other utility providers.
Does the proposal raise any educational capacity issues?	None identified

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	Yes – Merchant Homes Ltd, River Clyde Homes
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Inverclyde East as a poor market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	The site was the subject of a recent planning application (withdrawn) which indicates developer interest.

Key Agency Comments

HES	We note that this potential allocation proposes housing opposite the Category A listed Bay Street / Robert Street, Gourock Ropeworks (LB40067). We would therefore expect that any development in this location is carefully designed to take into account impacts on the setting of this Category A listed building. Given the important townscape / landmark value of the former Gourock Ropeworks, we would also recommend that we are engaged in early discussions regarding the scale, form and density of development in this location.
NatureScot	This site appears to be brownfield. We highlight that brownfield sites can be biodiversity hotspots and development proposals should take this in consideration. There are opportunities to link into existing Core paths.
Scottish Forestry	Few trees found on this site
SEPA	Flood Risk - Part of this site lies within the 1 in 200 year coastal floodplain. No development should take place within this area. A potentially culverted minor watercourse also flows through the site. Flood Risk Assessment required. A surface water flood hazard has been identified and should be discussed with FRMA and Scottish Water. Appropriate surface water management measures should be adopted. Water Environment - No comment
Scottish Water	There is sufficient water treatment works capacity to service proposed demands. Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any, this development has on the existing water treatment network.

	<p>Inverclyde PFI Treatment works has limited capacity for domestic sites and if any developers are proposing trade-effluent here they would need to work very closely on Scottish Water on this. Please see Scottish Water's advice for Growth Criteria and the Pre-Development Enquiry process. Please advise developers to submit pre-development enquiries as early as possible to start initial site assessments including flow rate assessments and discussions of trade effluent qualities and quantities. As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>Near-by watercourse should support a surface water solution - please see Scottish Water advice and policy on Surface Water.</p> <p>There is a 525mm combined foul pipe and a 9 inch water distribution pipe within the boundary of the site – please see the Scottish Water advice on infrastructure conflicts.</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under 'Climatic factors' topic in the sustainability assessment.
Transport Scotland	No comment

Other comments received to MIR consultation

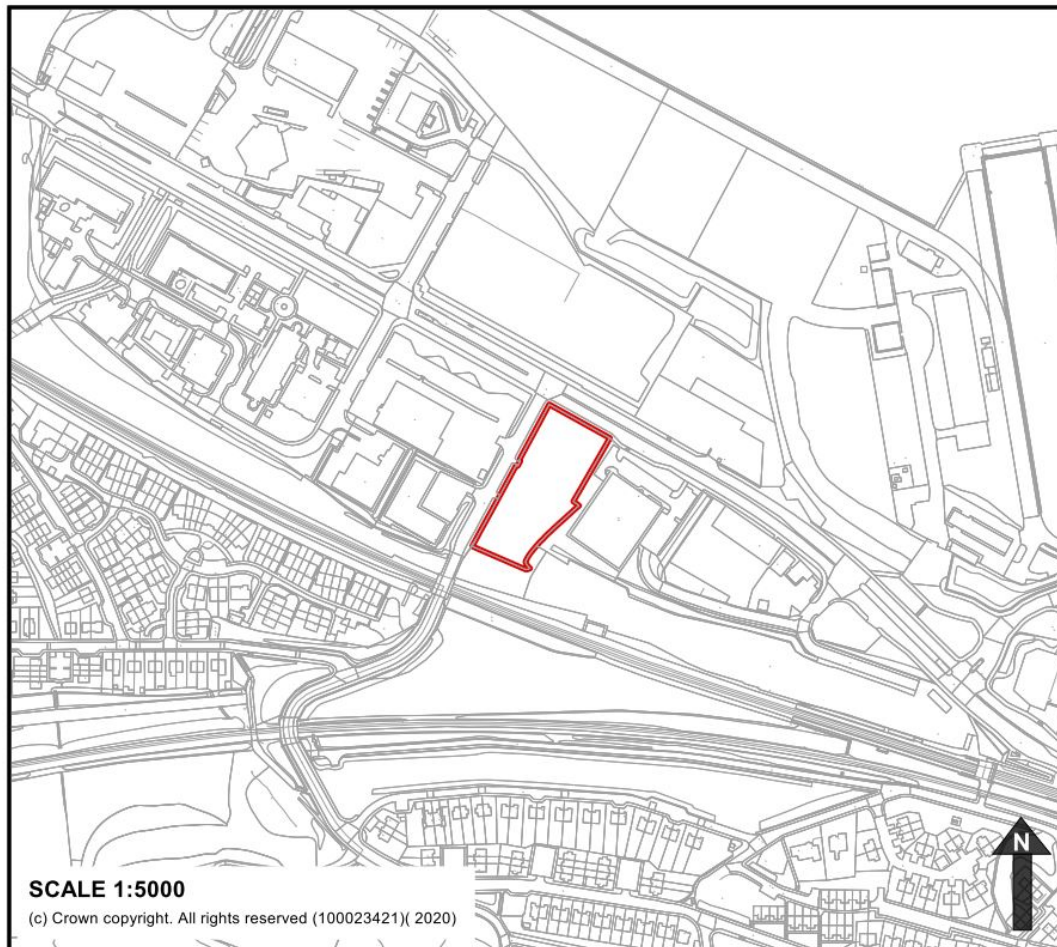
No other comments received.

Summary and conclusion

<p>The Bay Street site is not known to have any significant technical constraints which would impact deliverability. Flood risk and potential water and waste water network issues can be addressed at the planning application stage.</p> <p>No environmental designations cover the site. Redevelopment of this derelict site, which occupies a prominent location in Port Glasgow, could have a positive effect on the local landscape. However, close proximity to the adjacent A listed Gourock Ropeworks would mean a careful design-led approach would be required. Site is within an accessible distance of a regular public transport service and everyday services in Port Glasgow town centre. It is also adjacent to the active travel network.</p> <p>While the site is in an area considered by Homes for Scotland to have a poor market, a proven housebuilder is promoting the site and there has been a recent planning application, albeit now withdrawn.</p> <p>Owing to the close proximity to the A-listed Gourock Ropeworks, it is not considered appropriate to allocate the site for housing development as set out in the Main Issues Report submission. The site will be allocated as Residential Area.</p>

Site Details

Site name	Gibshill Road
Settlement	Greenock
Call for Sites reference	CFS25
Site size (ha)	0.6
Current use	Vacant land
Existing LDP designation	Business and Industry Development Opportunity



Proposal

Submitted by	RC Diocese of Paisley
Proposed Use	Residential
Number of houses/floorspace	50+
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p>The Gibshill Street site is an appropriate and sustainable location for mainstream or possibly affordable housing with an indicative capacity in excess of 50 units. While the land is currently identified within the existing adopted Local Plan as a 'Business and Industry Development Opportunity', there have been no enquiries regarding the redevelopment of the site for these uses. It is currently a brownfield site, with no facilities and is not formally used nor accessed by the general public. The site is wholly owned by the Diocese of Paisley</p> <p>The submitted Development Framework concluded that it is suitable for infill residential development, with no insurmountable barriers relating to transport and access, topography, ground conditions, services, flooding, cultural heritage or noise. As such, Gibshill Road is considered an appropriate location for additional housing which can be delivered in a sustainable way to respond to the site location and incorporate the highest standards of placemaking, as set out in Scottish Government Policy. In carefully planning an appropriate housing mix and sensitive landscaping of new development, Gibshill Street can deliver new homes of quality and value within proximity to Port Glasgow and Greenock. The site offers a deliverable and effective opportunity to meet the housing shortfall in Inverclyde.</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> • MIR representation • Development Framework Report <p><u>Comments relating to issues raised in Initial Site Assessment</u></p> <p><i>Biodiversity</i> - All major environmental issues will be agreed in consultation with the Council.</p>

Planning History

Planning Applications	No recent applications
Previous Plan - Reporters Comments	n/a

Green Belt boundary issues

Robustness of existing boundary	n/a
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Robustness of proposed boundary	n/a
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Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Surface water flood hazard identified. Known hydraulic constraints within the waste water network.
Biodiversity	11	No environmental designations within or in close proximity to the site. Potential for adverse impacts on area of semi-natural woodland within the southern boundary, but also opportunities to enhance habitat connectivity / green network, particularly in relation to the wooded area. Impact on protected species not known.
Climatic Factors	7, 5	Car travel and associated emissions would be minimised as the site is within 400m of a bus stop and 800m of a train station, both with regular service provision.
Air	13	Short term adverse impact during construction phase, but unlikely to lead to the designation of an AQMA.
Soil	13,4	No carbon rich soils or priority peatland within site. Redevelopment of brownfield land. Potentially contaminated site.
Landscape	11	Redevelopment of this vacant brownfield site is likely to have a positive effect on the local urban landscape.
Material Assets	4	Redevelopment of brownfield land
Cultural Heritage	10	Not in close proximity to any designated cultural heritage assets
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. Opportunities to link with adjacent core path network. Site not within an accessible distance to local services – 1.3km.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	<p><u>Inverclyde Council Roads Service</u></p> <p>Access should be taken from Gibshill Road and will be at least 25m back from the A8.</p> <p>Parking should be provided in accordance with approved parking standard.</p> <p><u>Transport Scotland</u></p> <p>The proposed residential development would access the local Gibshill Road and then the trunk road A8 (T) Port Glasgow Road. The intensification of the existing trunk road access will require to be assessed through a Transport Assessment/ Statement.</p>
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	<p>Scottish Water confirm that there is sufficient water capacity to service proposed demand, but limited waste water treatment capacity. Further investigations may be required to determine impacts on network capacities.</p> <p>No comments received from other utility providers.</p>
Does the proposal raise any educational capacity issues?	None identified

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	Submission indicates there has been unnamed developer interest.
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Inverclyde East as a poor market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	The submission indicates the site would be developed in the period to 2029. However, there is no named developer and site is in area of low market demand, so there is no certainty of this.

Key Agency Comments

HES	No comment
NatureScot	We welcome the intention to reuse brownfield land. We highlight that brownfield sites can be hotspots for biodiversity and this should be taken into consideration in any development proposals. There are opportunities to enhance the habitat connectivity / green networks, particularly in relation to the semi-natural woodland along the south-eastern boundary of the site. This should be retained and incorporated into the design of the development.

Scottish Forestry	Several broadleaved trees found on site
SEPA	<p>Flood Risk - A surface water flood hazard has been identified and should be discussed with FRMA and Scottish Water. Appropriate surface water management measures should be adopted.</p> <p>Water Environment - No comment</p>
Scottish Water	<p>There is sufficient water treatment works capacity to service proposed demands. Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any, this development has on the existing water treatment network.</p> <p>Inverclyde PFI Treatment works has limited capacity for domestic sites and if any developers are proposing trade-effluent here they would need to work very closely on Scottish Water on this. Please see Scottish Water's advice for Growth Criteria and the Pre-Development Enquiry process. Please advise developers to submit pre-development enquiries as early as possible to start initial site assessments including flow rate assessments and discussions of trade effluent qualities and quantities. As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under 'Climatic factors' topic in the sustainability assessment.
Transport Scotland	The proposed residential development would access the local Gibshill Road and then the trunk road A8 (T) Port Glasgow Road. The intensification of the existing trunk road access will require to be assessed through a Transport Assessment/ Statement.

Other comments received to MIR consultation

<p>In addition to any representations received from the site promoter or key agencies (see above):</p> <ul style="list-style-type: none"> 9 representations supported the proposal

Summary and conclusion

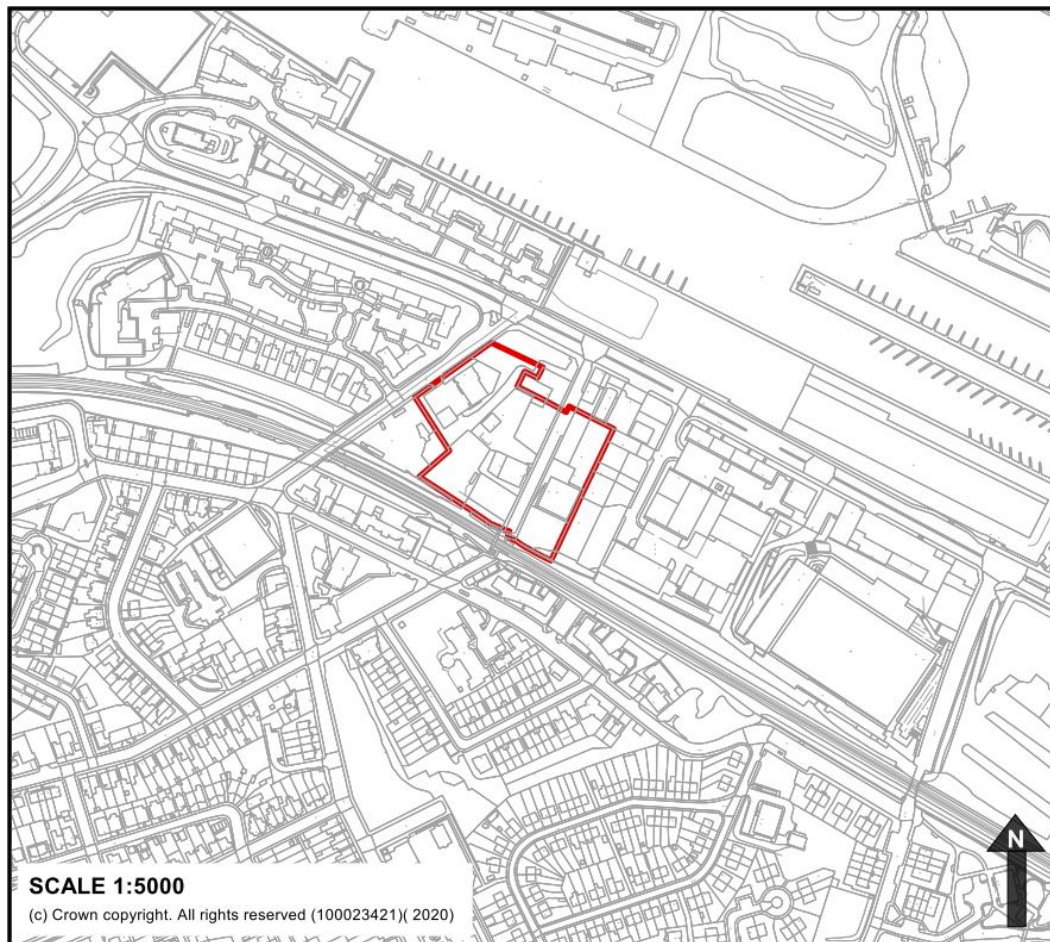
<p>The Gibshill Road site is not known to have any significant technical constraints which would impact deliverability. Flood risk and potential water and waste water network issues can be addressed at the planning application stage.</p> <p>No environmental designations cover the site and development is unlikely to have any adverse effects on wider natural heritage, subject to the woodland area being retained. Redevelopment of this derelict site is likely to have positive effect on the local urban landscape. Site within an accessible distance of a regular bus and train service, but not accessible to local services in Port Glasgow.</p> <p>The proposal would be contrary to the current business and industrial designation in the LDP and would introduce residential development to an industrial/business corridor.</p>
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With Homes for Scotland identifying Inverclyde East as a poor market area (2016), and a known developer not attached being to the site, it is not certain the site would be developed in the Plan period.

With regard to the above and the findings of the Housing Land Technical Report 2021, it is not considered appropriate or necessary to allocate this site for housing development in the Proposed Local Development Plan.

Site Details

Site name	Ratho Street/MacDougall Street
Settlement	Greenock
Call for Sites reference	CFS26
Site size (ha)	1.39
Current use	Business and Industry
Existing LDP designation	Part business & industry/ part not zoned



Proposal

Submitted by	Bbps
Proposed Use	Residential
Number of houses/floorspace	104 flats
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p>The site comprises a mixture of vacant former industrial land and buildings, together with office accommodation. It is surrounded on three sides by residential development and adjacent to an existing tenemental property at the corner of East Hamilton Street and Ratho Street. Given the overall overprovision of industrial land within Inverclyde and the activities of Riverside Inverclyde, it is all but impossible to lease any of the vacant land and buildings in the Ratho Street area. The Ratho Street site is effective and can be delivered to meet the immediate housing needs of Inverclyde. A Planning application for residential development (ref 09/0223/IC) was solely refused permission as the site was safeguarded for industrial use in the LDP. All other aspects of the application were acceptable to the Planning Authority, including roads, flooding and other technical matters.</p> <p>The proposal will fit with the surrounding residential properties, enhance the ongoing improvements along the A8 Corridor, and improve the amenity and visual appearance of the area. The development of the site, which would be serviced by a new road junction onto Ratho Street, additionally will provide a unique opportunity to assist in the free flow of traffic along East Hamilton Street by substantially reducing the amount of traffic movements at the MacDougall Street, East Hamilton Street junction.</p> <p>The current intention is to prepare a new planning application once LDP is approved.</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> 2020 – Development Opportunity Review <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p>None identified</p>

Planning History

Planning Applications	09/0223/IC - Planning application for 104 flats. Refused on 6/4/2017
Previous Plan - Reporters Comments	This site lies to the east of Greenock, in a mixed industrial and residential use area. At present it is partially occupied with commercial and industrial units with an area of open space bordering the A8 to the north. Carlsdyke railway station lies to the south of the site. It is allocated in the plan as having capacity for 100 private homes. Findings in relation to housing land supply in Inverclyde are set out at Issue 5 of this examination. There it is concluded that sufficient land has been allocated to meet the all tenure housing land requirement

	<p>for Inverclyde, for the whole of the plan period. It should be noted that this site at Ratho Street/MacDougall Street in Greenock is assumed to contribute to meeting that target through the provision of 100 homes. From my site visit, I note the tenements on MacDougall Street and the apartments and houses on Ratho Street. I am satisfied that at a notional capacity of 100, the site would have similar density to that of existing homes in the vicinity. The council advises that there remains sufficient business and industrial land available in Inverclyde in the plan period should this site be allocated for residential development. The council advises that existing uses can be relocated to alternative sites and/or premises. I did note the operational use onsite, but also observed the many vacant and available commercial/business/industrial premises and sites across Inverclyde on my site visits. I find that the relocation of the existing businesses on site would be possible. At present, the details of the layout and design of any development at Ratho Street/ MacDougall Street are not known. The interaction of the existing industrial uses and residential development and new residents is an issue that would be carefully assessed at the development management stage. Solutions for any potential traffic and/or safety impacts on the road network would also be assessed in full at that stage, although I note that the council's Road Service did not raise any significant concerns regarding additional traffic. The council advises that the southern entrance to Cartsdyke Station will not be affected by the proposed development of the site. Having no evidence to the contrary, I am satisfied that the southern entrance to the station will remain operational and unaffected by development. Policy 7 – Surface and Waste Water Drainage requires development proposals to demonstrate that both surface and waste water can be appropriately drained. I find that the development management process would be the appropriate place in the planning process to assess such issues and that the plan makes adequate provision for this assessment. Flooding and environmental issues are again matters that would be dealt with at the planning application stage. Overall, I conclude that the inclusion of the site at Ratho Street / MacDougall Street as a new residential development opportunity site for 100 homes is appropriate and no modification to the plan is required.</p>
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Green Belt boundary issues

Robustness of existing boundary	n/a
Robustness of proposed boundary	n/a

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Surface water flood hazard identified. Known hydraulic constraints within the waste water network.
Biodiversity	11	No environmental designations within or in close proximity to the site.

Climatic Factors	7, 5	Car travel and associated emissions would be minimized as site within 400m of bus stop with at least 6 buses per hour between 7am and 7pm on weekdays and 800m of a rail station.
Air	13	Short term impacts during the construction phase, but unlikely to lead to the designation of an AQMA
Soil	13,4	Redevelopment of brownfield land. Potentially contaminated site.
Landscape	11	Redevelopment of this industrial area for housing likely to have a positive effect on the local urban landscape.
Material Assets	4	Redevelopment of brownfield site
Cultural Heritage	10	Site is in close proximity to A the listed Sugar Warehouses and Titan Crane.
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. Site 116m from active travel network. Not within accessible distance of local services – 1.1km.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	<p>Main access from Ratho Street with no vehicle access from McDougall Street.</p> <p>Pedestrian access to the rail station should be retained from McDougall Street and a pedestrian route should be provided from Ratho Street to the rail station via the proposed development.</p> <p>Provide pedestrian links to neighbouring Carwood Street and McDougall Street.</p> <p>Suitable visibility should be provided at all accesses.</p> <p>Provide pedestrian links to bus stops on Carwood Street and A8 East Hamilton Street to be provided.</p> <p>Parking should be provided in accordance with approved parking standard.</p> <p>Development should include measures to reduce vehicle speeds within the site.</p> <p>Street lighting to be provided throughout site.</p>

Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	Scottish Water confirm that there is sufficient water capacity to service proposed demand, but limited waste water treatment capacity. Further investigations may be required to determine impacts on network capacities. No comments received from other utility providers.
Does the proposal raise any educational capacity issues?	None identified

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	None identified
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Inverclyde East as a poor market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	There are land assembly and current uses on site that would need resolved ahead of development.

Key Agency Comments

HES	We note that this potential allocation proposes housing in the vicinity of the Category A listed Greenock, James Watt Dock, Titan Cantilever Crane (LB34175). We would therefore expect that any development in this location is carefully designed to take into account impacts on the setting of this Category A listed building. We would also recommend that we are engaged in early discussions regarding the scale, form and density of development in this location.
NatureScot	No comment
Scottish Forestry	Several broadleaved trees found on site
SEPA	Flood Risk - A surface water flood hazard has been identified and should be discussed with FRMA and Scottish Water. Appropriate surface water management measures should be adopted. Water Environment - No comment
Scottish Water	There is sufficient water treatment works capacity to service proposed demands. Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any, this development has on the existing water treatment network. Inverclyde PFI Treatment works has limited capacity for domestic sites and if any developers are proposing trade-effluent here they would need to work very closely on Scottish Water on this. Please see Scottish Water's advice for Growth Criteria and the Pre-Development Enquiry process. Please advise developers to submit pre-development enquiries as early as possible to start initial site assessments including flow rate assessments

	<p>and discussions of trade effluent qualities and quantities. As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>Near-by watercourse should support a surface water solution – please see Scottish Water advice and policy on Surface Water.</p> <p>There is a combined waste pipe and a 90mm water distribution pipe within the boundary of the site - please see Scottish Water advice about Infrastructure Conflicts.</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under ‘Climatic factors’ topic in the sustainability assessment.
Transport Scotland	No comment

Other comments received to MIR consultation

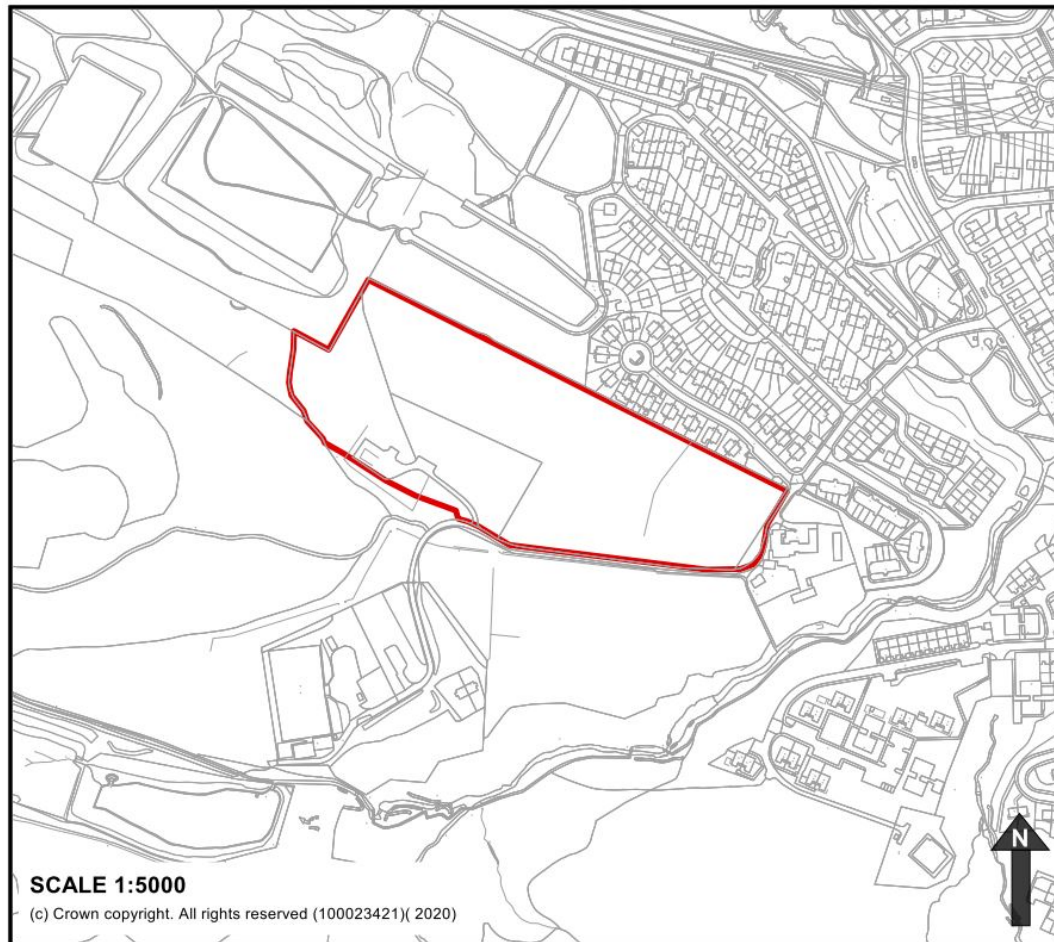
No other comments received

Summary and conclusion

<p>The Ratho/MacDougall street site is not known to have any significant technical constraints which would impact deliverability. Flood risk and potential water and waste water network issues can be addressed at the planning application stage.</p> <p>Development of this brownfield site in the urban area, at the interface of an industrial and residential area, is unlikely to have any effects on natural heritage, but impacts on nearby listed buildings would need to be carefully considered. The site is adjacent to a regular public transport service and the active travel network, but not within an accessible distance of local services.</p> <p>The site is in an area considered by Homes for Scotland to have a poor market and a proven developer has not expressed interest in the proposal. In addition, the site has not been progressed since being identified as housing development opportunity in the current LDP.</p> <p>The majority of the site proposed for residential development has been allocated for residential development in the previous LDP (now quashed). It is considered that the land bound by Ratho Street/MacDougall Street/A8/railway line is an appropriate housing development opportunity and should be identified in the Proposed Local Development Plan. However, the area of the site to the east of MacDougall Street should remain zoned for business/industry.</p>
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Site Details

Site name	Whinhill
Settlement	Greenock
Call for Sites reference	CFS27
Site size (ha)	4.25
Current use	Scrubland
Existing LDP designation	Green Belt



Proposal

Submitted by	Zoom Developments Holdings Ltd
Proposed Use	Residential
Number of houses/floorspace	Not identified
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p>Site was allocated in previous local plans and has historical consent for residential development, approx. 120 homes. There is a contract in place to commence re-levelling in 2021, roads consent is already granted, all utility services are available and there are no known constraints affecting development. There is market demand and developer interest in progressing the site. National planning policy supports the proposed allocation of this site which would ensure a generous land supply together with an appropriate range of housing in this location.</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none">• Outline Planning Consent (08/0125/IC)• MIR representation <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p>None identified</p>

Planning History

Planning Applications	08/0125/IC – Outline planning application for residential development. Approved on 24/6/2008.
Previous Plan - Reporters Comments	n/a

Green Belt boundary issues

Robustness of existing boundary	Formed by rear garden boundaries of Whinhill Crescent and rising topography
Robustness of proposed boundary	To be formed in the main by an existing road.

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Potential flood risk from minor watercourse along site boundary. Surface water flood hazard identified. Known hydraulic constraints within the waste water network.
Biodiversity	11	Site located close to the Whinhill LNCS, but development unlikely to have any significant effects. Potential for adverse effects on area of native woodland within south east corner. Impact on protected species not known.
Climatic Factors	7, 5	Car travel and associated emissions would be minimised as site is within 400m of bus stop with at least 6 buses per hour between 7am and 7pm on weekdays and 800m of a rail station.
Air	13	Short term impact during construction phase, but unlikely to lead to designation of an AQMA
Soil	13,4	No carbon rich soils or priority peatland within site. Development of greenfield land.
Landscape	11	Potential adverse impacts as site is elevated and prominent.
Material Assets	4	Greenfield development
Cultural Heritage	10	Not in close proximity to any cultural assets
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, which should complement adjacent habitats and link with the nearby active travel network. Site is not accessible to local services - within 1291m.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes
4	Will the proposal support any priority places or Town Centre or Priority Place regeneration priorities?	No

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	Existing road to be widened and footways to be added across the front of the site. Suitable access and visibility should be provided. Parking should be provided in accordance with approved parking standard. Development should include measures to reduce vehicle speeds within the site. Street lighting to be provided throughout site.
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	Scottish Water confirm that there is sufficient water capacity to service proposed demand, but limited waste water treatment capacity. Further investigations may be required to determine impacts on network capacities. No comments received from other utility providers.
Does the proposal raise any educational capacity issues?	None identified

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	Yes – Zoom Developments Holdings Ltd
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Inverclyde East as a poor market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	This site could potentially deliver some housing in the period to 2024 and the balance in the period to 2032.

Key Agency Comments

HES	No comment
NatureScot	This is a prominent greenfield site located on the edge of the settlement boundary. Careful consideration of siting and design will be required to ensure there are no adverse landscape impacts. Areas of semi-natural woodland should be retained and incorporated into the design of the development, contributing to a landscape framework. There is also an opportunity to enhance habitat connectivity / green networks including a network of high-quality open space. The site is located close to the Whinhill SINC and any development proposals should ensure that there are no negative impacts. Any development proposals should demonstrate a network of paths to provide convenient, safe and attractive active travel connections. These should link into the wider strategic network.
Scottish Forestry	Narrow Strip across from Strone Farm NWSS Canopy Cover 80%, NWSS Canopy Structure - 6, NWSS Habitat - Upland Mixed ashwood, NWSS Herbivore Impact - Medium, NWSS Type- Native Woodland, NWSS Maturity - Mixed, NWSS Nativeness - 100%.

SEPA	<p>Flood Risk - A minor watercourse flows along the site boundary which could represent a potential flood risk. A basic FRA, consisting of topographic information in the first instance and a detailed layout plan will be required. A surface water flood hazard has been identified and should be discussed with FRMA and Scottish Water. Appropriate surface water management measures should be adopted.</p> <p>Water Environment - No comment</p>
Scottish Water	<p>There is sufficient water treatment works capacity to service proposed demands. Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any, this development has on the existing water treatment network.</p> <p>Inverclyde PFI Treatment works has limited capacity for domestic sites and if any developers are proposing trade-effluent here they would need to work very closely on Scottish Water on this. Please see Scottish Water's advice for Growth Criteria and the Pre-Development Enquiry process. Please advise developers to submit pre-development enquiries as early as possible to start initial site assessments including flow rate assessments and discussions of trade effluent qualities and quantities. As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>Near-by watercourse should support a surface water solution - please see Scottish Water advice and policy on Surface Water.</p> <p>There is a 63 mm water distribution main, an abandoned 18 inch raw water supply and an abandoned 18 inch water distribution main within the boundary of the site – please see Scottish Water advice on Infrastructure Conflicts.</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under 'Climatic factors' topic in the sustainability assessment.
Transport Scotland	No comment

Other comments received to MIR consultation

No comments received on this specific site.

Summary and conclusion

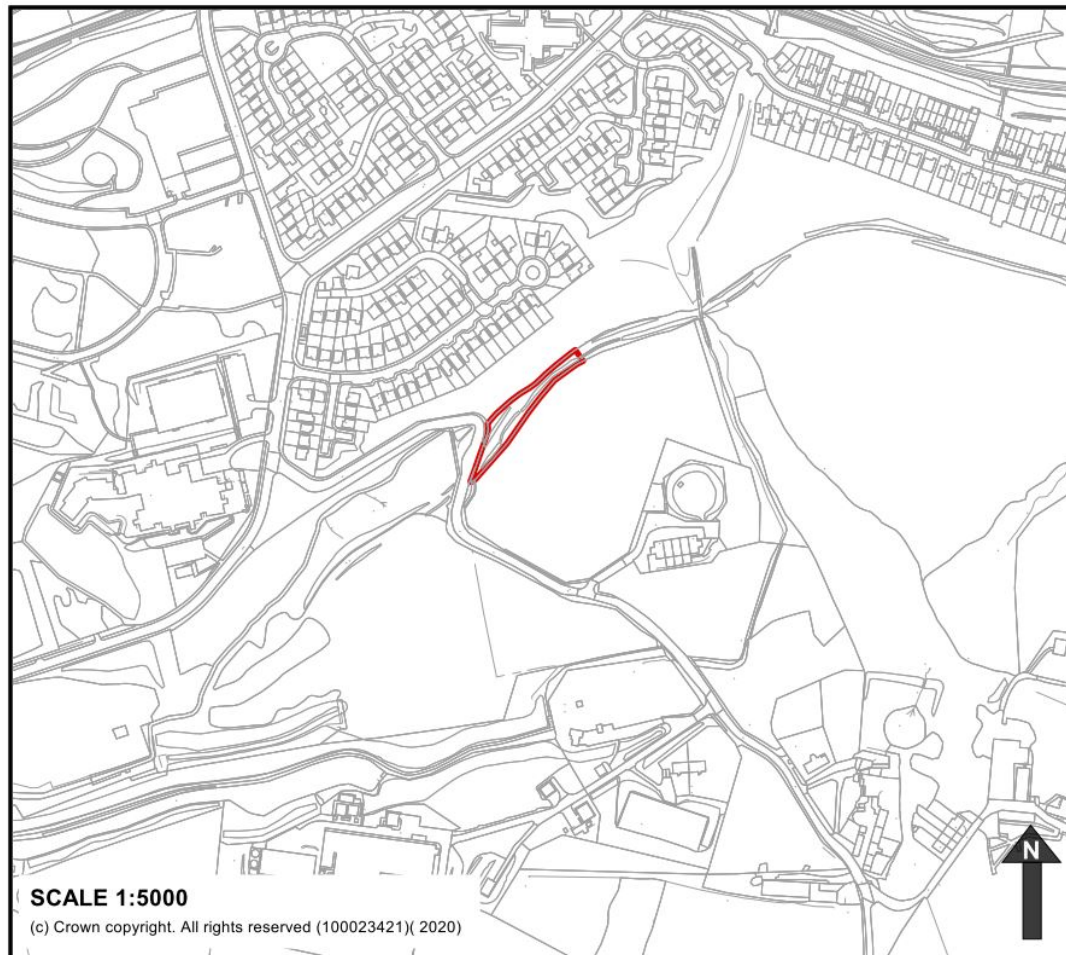
<p>The Whinhill site is not known to have any significant technical constraints which would impact deliverability. Flood risk and potential water and waste water network issues can be addressed at the planning application stage.</p> <p>Site is adjacent to the Whinhill LNCS but development unlikely to have any adverse effects on this or wider natural heritage, subject to identified mitigation. Due to the elevated and prominent nature of the site, development would have to be carefully sited and designed to avoid adverse effects on landscape. A robust green belt could be created. Within an accessible distance of a regular public transport service, but not accessible to local services in Greenock.</p>

While the site is in an area considered by Homes for Scotland to have a poor market, a developer is attached to the proposal.

With regard to the above and the findings of the Housing Land Technical Report 2021, it is considered that this site is an appropriate addition to the housing land supply in the Proposed Local Development Plan.

Site Details

Site name	Puggy Line
Settlement	Greenock
Call for Sites reference	CFS28
Site size (ha)	0.15
Current use	Woodland
Existing LDP designation	Green Belt



Proposal

Submitted by	Named individual
Proposed Use	Residential, Wind Farm, Children's play area
Number of houses/floorspace	6 houses
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p>Proposal for 6 houses and parking, otherwise wind farm or children's play area. Road access to the site is available and there are no known constraints affecting development. Developers have contacted the site owner, but lose interest due to the green belt designation.</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none">• Puggy Line House Plan <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p>None identified</p>

Planning History

Planning Applications	No recent applications
Previous Plan – Reporters Comments	n/a

Green Belt boundary issues

Robustness of existing boundary	n/a - Site sits within green belt.
Robustness of proposed boundary	n/a - Site sits within green belt.

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Potential flood risk from watercourse adjacent to site boundary. Opportunity to deculvert watercourse. Known hydraulic constraints within the waste water network.

Biodiversity	11	No environmental designations within or in close proximity to the site. Adverse effect on semi- natural woodland which covers the majority of the site
Climatic Factors	7, 5	Likely to increase car travel and associated emissions as site within 400m of a bus stop, but very limited service provision.
Air	13	Short term adverse impact during construction phase, but unlikely to lead to the designation of an AQMA.
Soil	13,4	No carbon rich soils or priority peatland within site. Development of greenfield land
Landscape	11	Relatively small sloping and prominent site, which is detached from existing development in Greenock by an area of semi-natural woodland to the north-west. Development of the site could set a precedent for further development towards Whinhill to the south / south-east, eroding the rural landscape setting.
Material Assets	4	Greenfield development
Cultural Heritage	10	Relatively close to a Scheduled Monument. While residential development is unlikely to have any adverse effects, a wind energy development could adversely impact the setting of this asset.
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. Site is 196m from the active travel network, but not within an accessible distance to local services – 1.2km.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	No
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No
6	Is the main purpose of the proposal to provide new infrastructure	Yes – one of the proposed uses is a wind energy development.

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	No footway access to site. Site is located on tight blind corners and it will be difficult to achieve the required visibility. Vehicles turning right into the site are unlikely to have sufficient visibility to determine if it is safe to turn into the site which could result in collisions. The developer must demonstrate how safe access will be provided.

	<p>Parking should be provided in accordance with approved parking standard.</p> <p>Development should include measures to reduce vehicle speeds within the site.</p> <p>Street lighting to be provided throughout site.</p>
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	<p>Scottish Water confirm that there is sufficient water capacity to service proposed demand, but limited waste water treatment capacity. Further investigations may be required to determine impacts on network capacities.</p> <p>No comments received from other utility providers.</p>
Does the proposal raise any educational capacity issues?	None identified

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	None identified
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Inverclyde East as a poor market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	No. The site is not considered to offer a viable development opportunity.

Key Agency Comments

HES	<p>This site is identified as an alternative option for the development of housing/wind energy. It is located in the vicinity of the Loch Thom-Overton, Water Cut scheduled monument (SM3244). The allocation of this area for housing raises no concerns for our historic environment interests. However, wind energy development in this area could have a setting impact on this scheduled monument, depending on the scale and nature of the development.</p>
NatureScot	<p>This appears to be a relatively small but prominent greenfield site. It appears to be steeply sloping. It is detached from existing development in Greenock by an area of semi-natural woodland to the north-west. Development of the site could set a precedent for further development towards Whinhill to the south / south-east, eroding the rural landscape setting. Any development proposals will need to take careful consideration of siting and design to ensure there are no adverse landscape and / or visual impacts.</p>
Scottish Forestry	<p>NFI Broadleaved woodland, NWSS Canopy Cover – 50%, NWSS Canopy Structure – 5, NWSS Habitat- Wet Woodland, NWSS Herbivore Impact – Medium, NWSS Type – Native woodland, NWSS Maturity – Mixed, NWSS – Nativeness – 100%</p>
SEPA	<p>Flood Risk - A minor watercourse flows adjacent to the site boundary which could represent a potential flood risk. A basic FRA, consisting of topographic information in the first instance and a detailed layout plan will be required</p> <p>Water Environment - Possible culverted minor watercourse at this location that could benefit from de-culverting</p>

Scottish Water	<p>There is sufficient water treatment works capacity to service proposed demands. Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any, this development has on the existing water treatment network.</p> <p>Inverclyde PFI Treatment works has limited capacity for domestic sites and if any developers are proposing trade-effluent here they would need to work very closely on Scottish Water on this. Please see Scottish Water's advice for Growth Criteria and the Pre-Development Enquiry process. Please advise developers to submit pre-development enquiries as early as possible to start initial site assessments including flow rate assessments and discussions of trade effluent qualities and quantities. As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>Near-by watercourse should support a surface water solution - please see Scottish Water advice and policy on Surface Water.</p> <p>There is an 8 inch water distribution main within the boundary of the site – please see Scottish Water advice on Infrastructure Conflicts.</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under Climatic factors topic in the SEA summary.
Transport Scotland	No comment

Other comments received to MIR consultation

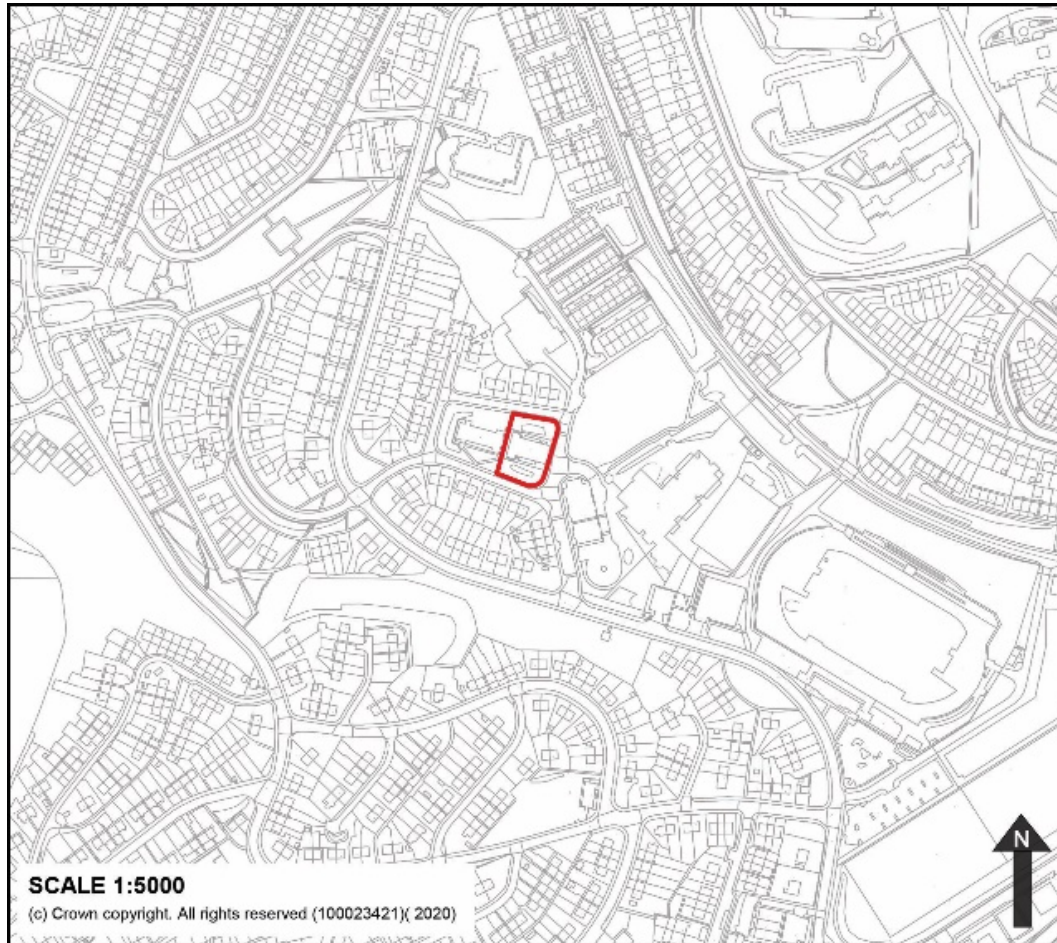
No further comments received.

Summary and conclusion

<p>Development of this site may be constrained by road access. Flood risk and potential water and waste water network issues can be addressed at the planning application stage.</p> <p>Development of the proposed uses is likely to have significant adverse effects on biodiversity and landscape as the majority of the site is covered by native woodland. Site is isolated from the main urban area and not within an accessible distance of a regular public transport services or local services in Greenock.</p> <p>The site is in an area considered by Homes for Scotland to have a poor market and a proven developer has not expressed interest in the proposal.</p> <p>With regard to the above and the findings of the Housing Land Technical Report 2021, it is not considered appropriate or necessary to allocate this site for housing development in the Proposed Local Development Plan. Owing to the detached nature of the site it is not considered appropriate for a children's playground. The LDP does not specifically allocate sites for wind farms The site is therefore not identified for development in the Proposed Plan.</p>

Site Details

Site name	Norfolk Road
Settlement	Greenock
Call for Sites reference	CFS29
Site size (ha)	0.18
Current use	Church
Existing LDP designation	N/a



Proposal

Submitted by	St. Ninian's Church (Larkfield)
Proposed Use	Residential
Number of houses/floorspace	Not identified
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p>The proposed site is available for development as the congregation is moving back into the adjacent building. There are no known constraints affecting development. The proposed site has a direct electricity supply and public foul drainage, with a gas supply nearby.</p> <p>There is evidence of market demand for residential development in the area. For example there is a proposal for development in our Parish at Spango Valley. A site was also recently developed nearby on Burns Road and new shop units at the foot of Auchmead Road.</p> <p><u>Supporting Documents</u> None submitted</p> <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u> None identified</p>

Planning History

Planning Applications	No recent applications
Previous Plan – Reporters Comments	n/a

Green Belt boundary issues

Robustness of existing boundary	n/a
Robustness of proposed boundary	n/a

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Surface water flood hazard identified. Known hydraulic constraints within the waste water network.
Biodiversity	11	No environmental designations within or in close proximity to the site.
Climatic Factors	7, 5	Car travel and associated emissions would be minimised as site is within 400m of bus stop with at least 6 buses per hour between 7am and 7pm on weekdays
Air	13	Short term adverse impact during construction phase, but unlikely to lead to the designation of an AQMA.
Soil	13,4	Brownfield development
Landscape	11	Unlikely to have any significant effects
Material Assets	4	Redevelopment of brownfield land
Cultural Heritage	10	Not in close proximity to any designated cultural heritage assets
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. Site is 529m from the active travel network and within an accessible distance to local services – 42km.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	Suitable access and visibility should be provided. Parking should be provided in accordance with approved parking standard. Development should include measures to reduce vehicle speeds within the site.

	Street lighting to be provided throughout site.
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	Scottish Water confirm that there is sufficient water capacity to service proposed demand, but limited waste water treatment capacity. Further investigations may be required to determine impacts on network capacities. No comments received from other utility providers,
Does the proposal raise any educational capacity issues?	None identified

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	None identified
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Inverclyde East as a poor market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	The site may be of interest to a local RSL.

Key Agency Comments

HES	No comment
NatureScot	No comment
Scottish Forestry	Few trees found on this site
SEPA	Flood Risk - A surface water flood hazard has been identified and should be discussed with FRMA and Scottish Water. Appropriate surface water management measures should be adopted. Water Environment - No comment
Scottish Water	There is sufficient water treatment works capacity to service proposed demands. Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any, this development has on the existing water treatment network. Inverclyde PFI Treatment works has limited capacity for domestic sites and if any developers are proposing trade-effluent here they would need to work very closely on Scottish Water on this. Please see Scottish Water's advice for Growth Criteria and the Pre-Development Enquiry process. Please advise developers to submit pre-development enquiries as early as possible to start initial site assessments including flow rate assessments and discussions of trade effluent qualities and quantities. As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.

	Near-by watercourse should support a surface water solution- please see Scottish Water advice and policy on Surface Water. There is a 300mm surface water pipe within the boundary of the site – please see Scottish Water advice on Infrastructure Conflicts.
Sportscotland	No comment
SPT	Public transport accessibility information provided under 'Climatic factors' topic in the sustainability assessment.
Transport Scotland	No comment

Other comments received to MIR consultation

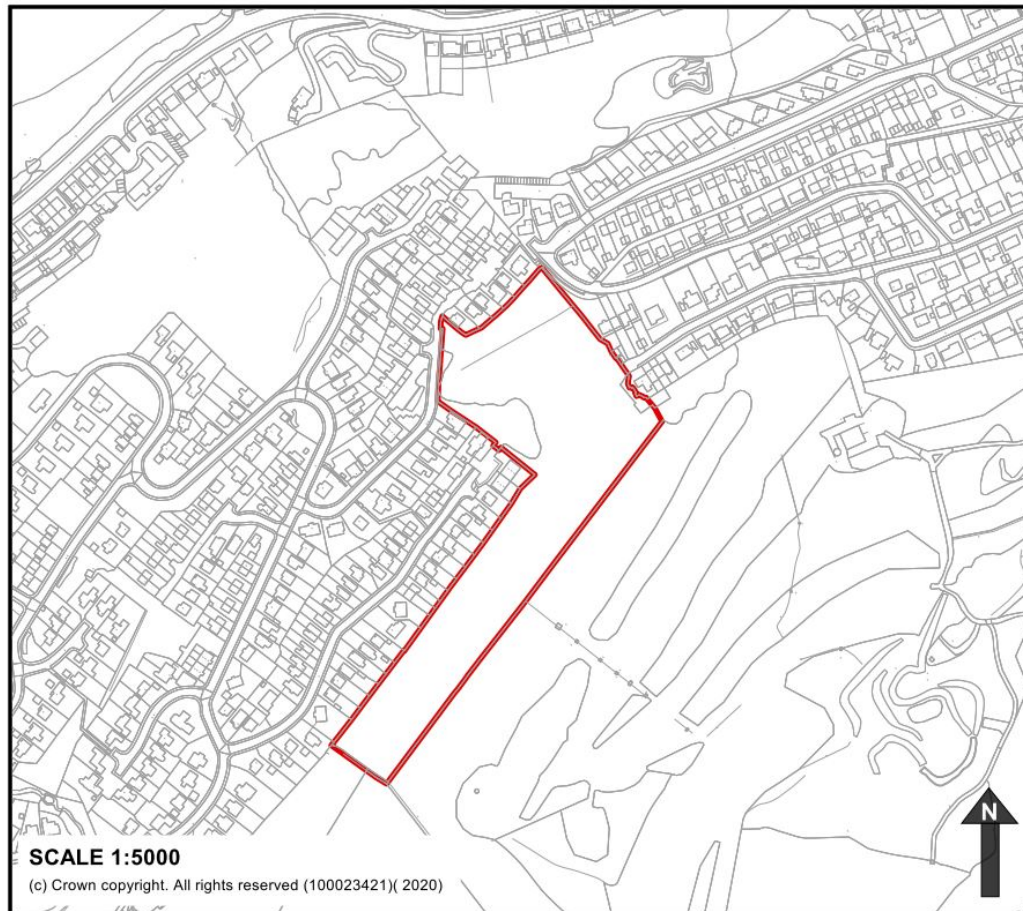
No further comments received

Summary and conclusion

<p>The Norfolk Road site is not known to have any significant technical constraints which would impact deliverability. Flood risk and potential water and waste water network issues can be addressed at the planning application stage.</p> <p>Redevelopment of this brownfield site in the urban area is unlikely to have any significant effects on natural or cultural heritage. Site is within an accessible distance of a regular public transport service and local services in Greenock.</p> <p>While the site is in an area considered by Homes for Scotland to have a poor market and a proven developer has not expressed interest in the proposal, it is considered that the site may be of interest to an RSL.</p> <p>With regard to the above and the findings of the Housing Land Technical Report 2021, it is considered that this site is an appropriate addition to the housing land supply in the Proposed Local Development Plan.</p>

Site Details

Site name	Carnoustie Avenue (1)
Settlement	Gourock
Call for Sites reference	CFS30
Site size (ha)	3.27
Current use	Open area of scrubland and woodland
Existing LDP designation	Green Belt



Proposal

Submitted by	Buckingham Properties
Proposed Use	Residential
Number of houses/floorspace	Approx. 48 residential houses
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p>Mixed development of detached and semi-detached homes in low density of around 6 units per acre, which would provide additional quality housing in a popular residential area and may help arrest declining population within the district. The area is served by existing road network, with proposed access via Carnoustie Avenue, but with possibilities to connect to Gleneagles Drive or Doune Gardens. Utility connections are all close by due to the surrounding residential development and there are no constraints affecting development. There is developer interest in the site – Buckingham Properties</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> MIR representation <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p><i>Biodiversity/Landscape/Green Belt boundary</i> – Development would have little adverse effect on the landscape setting of the immediate area as the majority of vegetation is self-seeded scrub. The only area worthy of retention would be that that which runs north /south along a small area in the centre of the northern part of the site along a small water course which would be retained as part of the landscaping of the site. The only trees of any significance are a line of mature fir trees that run along the southern boundary of the site and form a natural greenbelt boundary between the site and the natural greenbelt boundary that is Gourock Golf Course. It should be noted that this line of mature fir trees actually lie along the north west boundary of the golf course, not within the proposal site. We would strongly suggest that the golf course and not this insignificant area of scrub is a more natural and defensible edge to the Greenbelt.</p> <p><i>Population and Health</i> – The square part of the site that lies adjacent to Taymouth Drive may have been intended as open space when the houses at Taymouth Drive were constructed, but no rights of access were reserved by the developer which has restricted access ever since. Opening up the site from our ground adjoining Carnoustie Avenue would allow for access and the possibility of connectivity with Taymouth Drive.</p> <p><i>Deliverability</i></p> <p>Buckingham Properties have an interest in developing the site. Comparing the proposed site with Levan Farm Site is not a relevant comparison in terms of (1) scale, (2) western Gourock is an attractive residential location and has always proved attractive to potential purchasers looking to relocate to and within the area as evidenced by developments at Cowal View and Kirn Drive (3) between 2007 and</p>

	2017 the country and the property sector in particular was in recession with limited funding available from the banking sector for construction. This held back development throughout the country for a decade. This site is deliverable by 2032.
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Planning History

Planning Applications	No recent applications
Previous Plan – Reporters Comments	n/a

Green Belt boundary issues

Robustness of existing boundary	Formed by a strong woodland boundary
Robustness of proposed boundary	To be formed by a strong woodland edge along the eastern site boundary adjacent to the greenbelt.

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Potential flood risk from minor watercourse identified. Known hydraulic constraints within the waste water network.
Biodiversity	11	Relatively small TPO within the north western part of site. Native Woodland within the north west part and along the back of Taymouth Drive. Impact on protected species not known. Opportunities for enhancements to green network/habitat connectivity.
Climatic Factors	7, 5	Car travel and associated emissions would be minimised as the site is within 400m of bus stop with at least 1 bus per hour between 7am and 7pm on weekdays
Air	13	Short term adverse impact during construction phase, but unlikely to lead to the designation of an AQMA.
Soil	13,4	No carbon rich soils or priority peatland within site. Development of greenfield land
Landscape	11	Prominent and steeply sloping site. The removal of the semi-natural woodland areas would have significant adverse effects on landscape setting.
Material Assets	4	Greenfield development
Cultural Heritage	10	Not in close proximity to any designated cultural heritage assets
Population and Health	5, 8, 13	While development would result in the loss of open space within the north western part of site, which is identified and safeguarded as such in the LDP, it is not considered to be of high quality and provision could be enhanced through development. Site is 824m from the active travel network, but not accessible to local services – 2.3km.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	Carnoustie Ave and Taymouth Dr should be connected. Suitable access and visibility should be provided. Parking should be provided in accordance with approved parking standard. Development should include measures to reduce vehicle speeds within the site. Street lighting to be provided throughout site.
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	Scottish Water confirm that there is sufficient water capacity to service proposed demand, but limited waste water treatment capacity. Further investigations may be required to determine impacts on network capacities. No comments received from other utility providers.
Does the proposal raise any educational capacity issues?	There are potential school capacity issues within the catchment this site is located in.

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	Yes – Buckingham Properties
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Inverclyde West as a moderate market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	No – The nearby Levan Farm site, which is under the same ownership, has not been developed since identification in the 2005 Local Plan

Key Agency Comments

HES	No comment
NatureScot	This appears to be a prominent, steeply sloping greenfield site. There is a band of semi-natural woodland along the south-eastern boundary of the site which should be retained, contributing to the landscape framework. There are also opportunities to enhance the habitat connectivity here. The site currently appears to be used for informal recreation and development proposals should incorporate a network of paths.
Scottish Forestry	In the larger area squared area surrounded by houses NFI - Broad Leaved Woodlands, NWSS Canopy - 70%, NWSS Canopy Structure - 6, NWSS Habitat - Lowland mixed deciduous woodland, NWSS Herbivore Impact - Medium, NWSS Type - Native woodland, NWSS Maturity - Mixed. The strip of woodland running down the back of the houses on Taymouth Drive NFI - Broad Leaved Woodland, NWSS Canopy Cover 80%, NWSS Canopy Structure - 6, NWSS Habitat - Wet Woodland, NWSS Herbivore Impact- Medium, MWSS Type - Native Woodland, NWSS Maturity - Mixed.
SEPA	Flood Risk - A minor watercourse flows along the site boundary which could represent a potential flood risk. A basic FRA, consisting of topographic information in the first instance and a detailed layout plan will be required. Water Environment - No comment
Scottish Water	There is sufficient water treatment works capacity to service proposed demands. Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any, this development has on the existing water treatment network. Inverclyde PFI Treatment works has limited capacity for domestic sites and if any developers are proposing trade-effluent here they would need to work very closely on Scottish Water on this. Please see Scottish Water's advice for Growth Criteria and the Pre-Development Enquiry process. Please advise developers to submit pre-development enquiries as early as possible to start initial site assessments including flow rate assessments and discussions of trade effluent qualities and quantities. As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments. Near-by watercourse which should support a surface water solution- please see Scottish Water advice and policy on Surface Water.
Sportscotland	No comment
SPT	Public transport accessibility information provided under 'Climatic factors' topic in the sustainability assessment.
Transport Scotland	No comment

Other comments received to MIR consultation

No further comments received

Summary and conclusion

The Carnoustie (1) site is not known to have any significant technical constraints which would impact deliverability. Flood risk and potential water and waste water network issues can be addressed at the planning application stage.

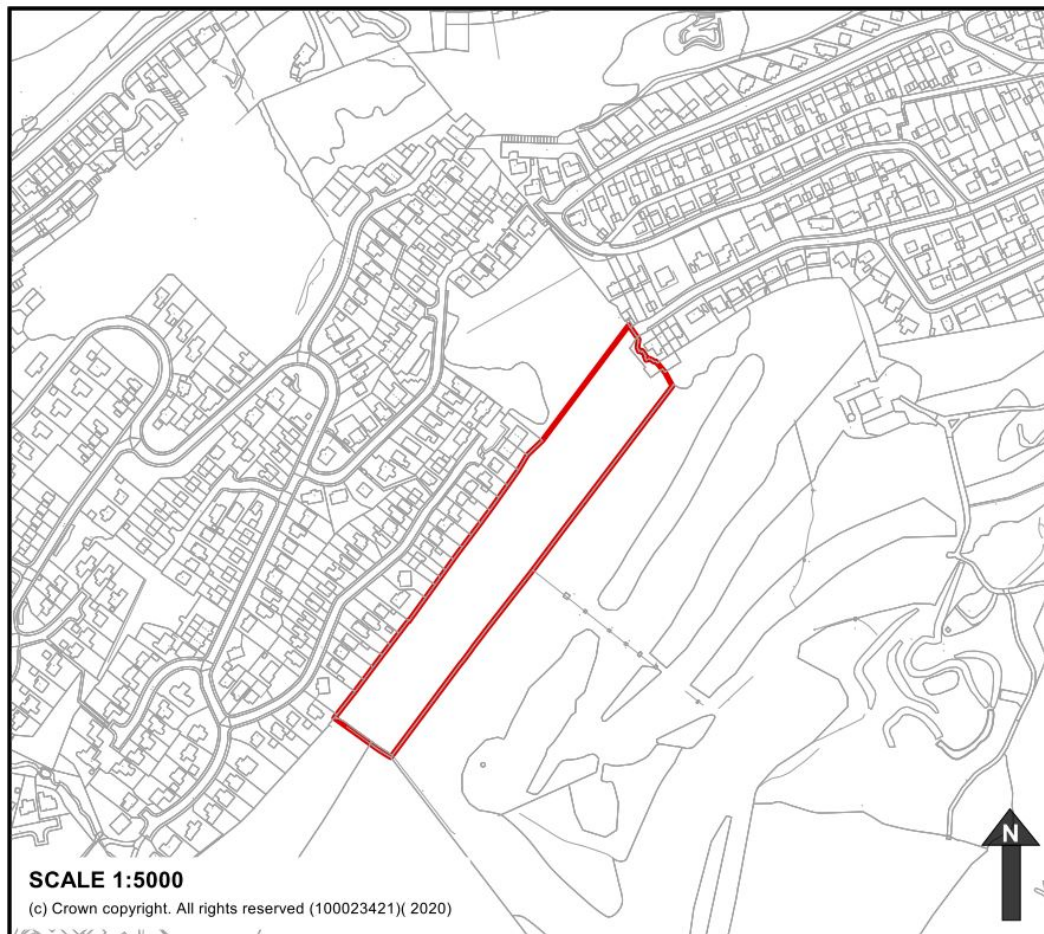
TPO within the north western part of the site. Development would need to retain identified areas of native woodland to avoid significant effects on natural heritage and landscape setting. Development would breach the established green belt boundary and remove a robust boundary of established woodland. The site is within an accessible distance of a regular public transport service, but not local services in Gourrock.

While the site is in a moderate market area and a proven developer is attached to the proposal, there are concerns about deliverability as the nearby Levan Farm site has not been progressed for development.

With regard to the above and the findings of the Housing Land Technical Report 2021, it is not considered appropriate or necessary to allocate this site for housing development in the Proposed Local Development Plan.

Site Details

Site name	Carnoustie Avenue (2)
Settlement	Gourock
Call for Sites reference	CFS31
Site size (ha)	1.97
Current use	Wooded
Existing LDP designation	Green Belt



Proposal

Submitted by	Buckingham Properties
Proposed Use	Residential
Number of houses/floorspace	25-30 units
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p>The proposal is for a mix of split level detached homes in low density development of around 5-6 per acre, which would provide additional quality housing in a popular area residential area and may help arrest declining population within the district. Proposal would see extension of existing public roads into the site. Utility connections are all close by due to the surrounding residential development and there are no constraints affecting development. There is developer interest in the site – Buckingham Properties.</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> MIR representation <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p><i>Biodiversity/Landscape/Green Belt boundary</i> - Development would have little adverse effect on the landscape setting of the immediate area as the majority of vegetation is self-seeded scrub. The only area worthy of retention would be that that which runs north /south along a small area in the centre of the northern part of the site along a small water course which due to topography would not be developable and would be retained as part of the landscaping of the site. The only trees of any significance are a line of mature fir trees that run along the southern boundary of the site and form a natural greenbelt boundary between the site and the natural greenbelt boundary that is Gourock Golf Course. However it should be noted that this line of mature fir trees actually lie along the north west boundary of the golf course and do not lie within the proposal site. Therefore the golf course and not this insignificant area of scrub is a more natural and defensible edge to the Greenbelt.</p> <p><i>Deliverability</i></p> <p>Buckingham Properties have an interest in developing the site.</p> <p>Comparing the proposed site with Levan Farm Site is not a relevant comparison in terms of (1) scale, (2) western Gourock is an attractive residential location and has always proved attractive to potential purchasers looking to relocate to and within the area as evidenced by developments at Cowal View and Kirn Drive (3) between 2007 and 2017 the country and the property sector in particular was in recession with limited funding available from the banking sector for construction. This held back development throughout the country for a decade. This site is most definitely deliverable by 2032.</p>

Planning History

Planning Applications	No recent applications
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Previous Plan - Reporters Comments	n/a
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Green Belt boundary issues

Robustness of existing boundary	Formed by a strong woodland boundary
Robustness of proposed boundary	Would be formed by a strong woodland edge along the eastern site boundary adjacent to the greenbelt.

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Potential flood risk from minor watercourse identified. Known hydraulic constraints within the waste water network
Biodiversity	11	Strip of native woodland running north south alongside Taymouth Drive. Impacts on protected species not known. Opportunities for enhancements to green network/habitat connectivity.
Climatic Factors	7, 5	Car travel and associated emissions would be minimised as the site is within 400m of bus stop with at least 1 bus per hour between 7am and 7pm on weekdays
Air	13	Short term adverse impact during construction phase, but unlikely to lead to the designation of an AQMA.
Soil	13,4	No carbon rich soils or priority peatland within site. Development of greenfield land
Landscape	11	The removal of the semi-natural woodland areas would have adverse effects on landscape setting.
Material Assets	4	Greenfield development
Cultural Heritage	10	Not in close proximity to any designated cultural heritage assets
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. Site is 824m from the active travel network, but not accessible to local services – 2.3km.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes

4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No
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Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	Suitable access and visibility should be provided. Parking should be provided in accordance with approved parking standard. Development should include measures to reduce vehicle speeds within the site. Street lighting to be provided throughout site.
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	Scottish Water confirm that there is sufficient water capacity to service proposed demand, but limited waste water treatment capacity. Further investigations may be required to determine impacts on network capacities. No comments received from other utility providers
Does the proposal raise any educational capacity issues?	There are potential school capacity issues within the catchments this site is located in.

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	Yes – Buckingham Properties
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Inverclyde West as a moderate market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	No. The nearby Levan Farm site has not been developed since identification in the 2005 Plan

Key Agency Comments

HES	No comment
NatureScot	No comment
Scottish Forestry	The strip at of woodland running down the back of the houses on Taymouth Drive NFI - Broad Leaved Woodland, NWSS Canopy Cover 80%, NWSS Canopy Structure - 6, NWSS Habitat - Wet Woodland, NWSS Herbivore Impact- Medium, MWSS Type - Native Woodland, NWSS Maturity - Mixed.

SEPA	<p>Flood Risk - A minor watercourse flows along the site boundary which could represent a potential flood risk. A basic FRA, consisting of topographic information in the first instance and a detailed layout plan will be required.</p> <p>Water Environment - No comment</p>
Scottish Water	<p>There is sufficient water treatment works capacity to service proposed demands. Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any, this development has on the existing water treatment network.</p> <p>Inverclyde PFI Treatment works has limited capacity for domestic sites and if any developers are proposing trade-effluent here they would need to work very closely on Scottish Water on this. Please see Scottish Water's advice for Growth Criteria and the Pre-Development Enquiry process. Please advise developers to submit pre-development enquiries as early as possible to start initial site assessments including flow rate assessments and discussions of trade effluent qualities and quantities. As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>Near-by watercourse should support a surface water solution- please see Scottish Water advice and policy on Surface Water.</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under Climatic factors topic in the SEA summary.
Transport Scotland	No comment

Other comments received to MIR consultation

No further comments received

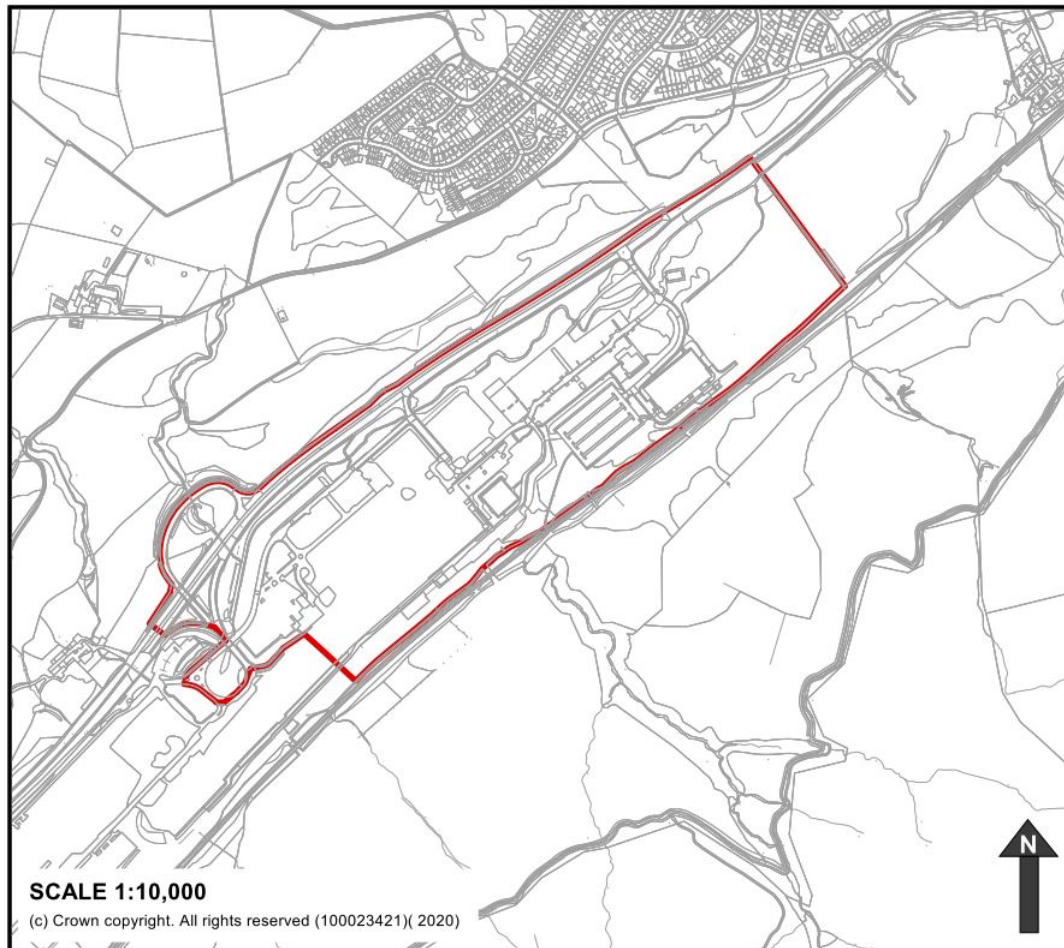
Summary and conclusion

<p>The Carnoustie (2) site is not known to have any significant technical constraints which would impact deliverability. Flood risk and potential water and waste water network issues can be addressed at the planning application stage.</p> <p>No environmental designations within the site, but development would need to retain identified areas of native woodland to avoid significant effects on natural heritage and landscape setting. Development would breach the established green belt boundary and remove a robust boundary of established woodland. The site is within an accessible distance of a regular public transport service, but not local services in Gourrock.</p> <p>While the site is in a moderate market area and a proven developer is attached to the proposal, there are concerns about deliverability as the nearby Levan Farm site has not been progressed for development.</p> <p>With regard to the above and the findings of the Housing Land Technical Report 2021, it is not considered appropriate or necessary to allocate this site for housing development in the Proposed Local Development Plan.</p>

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Site Details

Site name	Spango Valley (former IBM site)
Settlement	Greenock
Call for Sites reference	CFS32
Site size (ha)	32.23
Current use	Vacant land
Existing LDP designation	Priority Place



Proposal

Submitted by	Advance Construction (GD) Ltd
Proposed Use	Mixed use
Number of houses/floorspace	c. 450 Homes including houses and flats c.15000sqm of Class 4, 5 & 6 Business, Industrial & Storage & Distribution c.1500sqm Class 1 retail c.1000sqm Class 3 food & drink Park & Ride facility
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p>The proposal will deliver housing, business and industrial uses, neighbourhood retail, a park and ride, a deculverted/daylighted Hole of Spango and an extensive network of paths connecting with a newly opened railway halt and the wider path and cycle network.</p> <p>Redevelopment of this brownfield site provides an opportunity to support regeneration and address any contamination conditions. The landscape capacity-led masterplan sensitively responds to the character and vernacular of the local area and has sensitively integrated the development into the natural environment, incorporating existing mature trees into new parks and open spaces. All utility services and available on site.</p> <p>The submitted Environmental Impact Assessment considers the impact of the development in relation to a range of environmental receptors and identifies appropriate mitigation measures, where necessary.</p> <p>A market report submitted with application reference 20/0021/IC refers to the market demand for the proposed development.</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> • Design and Access Statement • MIR representation <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p><i>Flood risk</i> – A Flood Risk Assessment was submitted with the current planning application.</p> <p><i>Biodiversity</i> - The Environmental Impact Assessment identified 16 Phase 1 habitat types within the site boundary, but assessed the impacts of the proposed development on these important ecological features, including the broad UKBAP habitat broadleaved, mixed and yew woodland, marshy grassland, hedgerow, scrub and bluebells, to be negligible and temporary in nature. The baseline survey of the site did not identify evidence of protected and/or notable species.</p> <p><i>Landscape</i> - A landscape strategy has been prepared. Consideration of the baseline conditions has informed the layout within the site, with regards to the location, height and quantum of developable areas and their use, and areas of green space</p>

Planning History

Planning Applications	20/0021/IC - Application for proposed use was submitted in Feb 2020 and is pending.
Previous Plan - Reporters Comments	Spango Valley is now a large scale redundant brownfield site. It was previously intensively used as an industrial facility by a major multi-national computer company over a long period, and also includes the former site of a secondary school. It enjoys direct access from the A78 trunk road and is served by its own rail station. The employment and financial benefits generated for Inverclyde and the surrounding area would have been substantial, and the local infrastructure supported it. The prospects of another single industrial user of similar scale being attracted to the site are slim. In these circumstances, I consider that it is wholly appropriate that Spango Valley should be identified as a priority place for re-development, with a mix of uses as generally specified in schedule 2 as the preferred strategy for it. This would ensure a significant element of employment generating uses, and also recognise the opportunity for a significant residential component as well, which has been confirmed in representations by a national house-builder. I find no evidence of infrastructure or service constraints which would preclude the type of developments proposed, and the use of this large brownfield site would help to ease the pressures to release other greenfield land for development purposes. Concerns raised regarding potential flooding, subsidence, access, additional planting and amenity would be addressed in the consideration of specific planning applications, and more detailed advice on these matters can also be provided by the council in the proposed supplementary guidance for priority places. The potential use of part of the site for park and ride was identified in representations, and I agree with the council that it would be appropriate that this should also be referred to in schedule 2. The alternative description for the proposed prison on the former Greenock High School site, for which planning permission in principle has been granted, is a matter for the council.

Green Belt boundary issues

Robustness of existing boundary	Formed by the Wemyss Bay – Glasgow railway line and the A78 to the east and west and a robust line of semi-natural woodland to the south.
Robustness of proposed boundary	Would be formed by the Wemyss Bay – Glasgow railway line and the A78 to the east and west and a robust line of semi-natural woodland to the south

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Part of site within medium/high fluvial flood risk area, with potential flood risk from multiple watercourses through site. Surface water flood hazard identified. Flood Risk Assessment submitted with the current planning application found that identified risks can be mitigated. Green Network Partnership Green Infrastructure Study identifies a number of water related enhancement measures, including daylighting watercourses through the site.

		Known hydraulic constraints within the waste water network
Biodiversity	11	<p>No environmental designations within or in close proximity to the site. While the submitted EIA identified a range of priority habitats, it found that the impacts of development would be negligible and temporary, subject to mitigation. Protected species not identified on site.</p> <p>The Design and Access Statement incorporates a significant number of the green network enhancements identified in the Green Network Partnership Green Infrastructure Study.</p>
Climatic Factors	7, 5	Car travel and associated emissions will be minimised as the site is within 400m of bus stop with at least 1 bus per hour between 7am and 7pm on weekdays
Air	13	Short term adverse impact during construction phase, but unlikely to lead to the designation of an AQMA.
Soil	13,4	Redevelopment of brownfield site. Potentially contaminated site
Landscape	11	It is noted that the Landscape and Visual assessment included in the submitted EIA concluded that “the proposed development.....will have a significant and beneficial residual effect upon the landscape resource and visual amenity of the study”. The submitted Design and Access Statement incorporates a significant number of the landscape elements in the Green Network Partnership Green Infrastructure Study.
Material Assets	4	Redevelopment of brownfield site
Cultural Heritage	10	Not in close proximity to any designated cultural heritage assets
Population and Health	5, 8, 13	It is noted that the submitted Design and Access Statement incorporates a significant number of elements identified in the Green Network Partnership Green Infrastructure Study, including open space and links with nearby active travel network. Site not accessible to local services – 2.7km

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	The site is within the settlement boundary but detached from existing built development.
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	Yes – site part of the Spango Valley Priority Place

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	<p>Main access from A78 slip roads.</p> <p>Provide pedestrian links to neighbouring residential estates.</p> <p>Provide cycle links through the development to surrounding network.</p> <p>Bus stops should be considered within the site to encourage bus operators to service the site.</p> <p>Suitable visibility should be provided at all accesses.</p> <p>Provide road links which would allow bus services to penetrate the site.</p> <p>Provide pedestrian, cycle and vehicle links to the rail station including a car park to encourage park and ride.</p> <p>Parking should be provided in accordance with approved parking standard.</p> <p>Development should include measures to reduce vehicle speeds within the site.</p> <p>Street lighting to be provided throughout site.</p>
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	<p>Scottish Water confirm that there is sufficient water capacity to service proposed demand, but limited waste water treatment capacity. Further investigations may be required to determine impacts on network capacities.</p> <p>No comments received from other utility providers.</p>
Does the proposal raise any educational capacity issues?	There are potential school capacity issues within the catchments this site is located in.

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	Yes – Advance Construction (GD) Ltd
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Inverclyde West as a moderate market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	Yes, with the majority developed in the 2024-2032 period.

Key Agency Comments

HES	No comment
NatureScot	The site has an established landscape framework and is on the edge of the existing settlement, offering potential opportunities to improve access to the wider countryside – siting, design and mitigation requirements could usefully be set out in a development brief to guide the detailed design stages.
Scottish Forestry	Significant amount of trees bordering this site road side.
SEPA	<p>Flood Risk - Part of this site lies within the 1 in 200 year floodplain. No development should take place within this area. Multiple watercourses flow through or adjacent to the site. Flood Risk Assessment required. A surface water flood hazard has been identified and should be discussed with FRMA and Scottish Water. Appropriate surface water management measures should be adopted.</p> <p>Water Environment - No comment</p>
Scottish Water	<p>There is sufficient water treatment works capacity to service proposed demands. Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any, this development has on the existing water treatment network.</p> <p>Inverclyde PFI Treatment works has limited capacity for domestic sites and if any developers are proposing trade-effluent here they would need to work very closely on Scottish Water on this. Please see Scottish Water's advice for Growth Criteria and the Pre-Development Enquiry process. Please advise developers to submit pre-development enquiries as early as possible to start initial site assessments including flow rate assessments and discussions of trade effluent qualities and quantities. As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>Near-by watercourse should support a surface water solution- please see Scottish Water advice and policy on Surface Water.</p> <p>There is a 650mm combined foul pipe and a 300 mm trunk water main within the site boundary - please see Scottish Water advice about infrastructure conflicts</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under 'Climatic factors' topic in the sustainability assessment. It is essential that a masterplan is developed for the full site to ensure a coordinated and comprehensive approach to design, layout and infrastructure provision. In terms of transport this should be accompanied by a robust transport appraisal of the sustainable travel options for the site as a whole. We suggest that this is recognised in the Proposed Plan.
Transport Scotland	Transport Scotland recommends the retention of the preferred option, a comprehensive masterplan to develop the whole site is recommended. A holistic approach to development is required to ensure development is brought forward in a coordinated way. Transport Scotland will engage on the planning application as appropriate, however it is important the LDP sets out a comprehensive and appropriate strategy for the sites.

Other comments received to MIR consultation

In addition to any representations received from the site promoter or key agencies (see above):

- Network Rail seek early engagement with the Council and developers not only in the physical design and construction process of any connections and parking facility but also in assessing the capacity of the station and rail service provision to cater for project demand in travel. In addition, there is a level crossing at Dunrod (WYS line) to the south of Spango Valley and the new Plan should provide strategic guidance to avoid allocating development required to use the level crossing. It is essential that these considerations form part of the Transportation Assessment for the site. We also consider that there is a need to make clear that developer contributions are essential to ensure the delivery of such facilities. The Pooling Approach is to be advocated especially where the development of Spango Valley is likely to require multiple developers to realise its potential.
- 1 representation supported mixed tenure housing on the site.
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Summary and conclusion

The Spango Valley (former IBM) site is not known to have any significant technical constraints which would impact deliverability. Flood risk and potential water and waste water network issues can be addressed at the planning application stage.

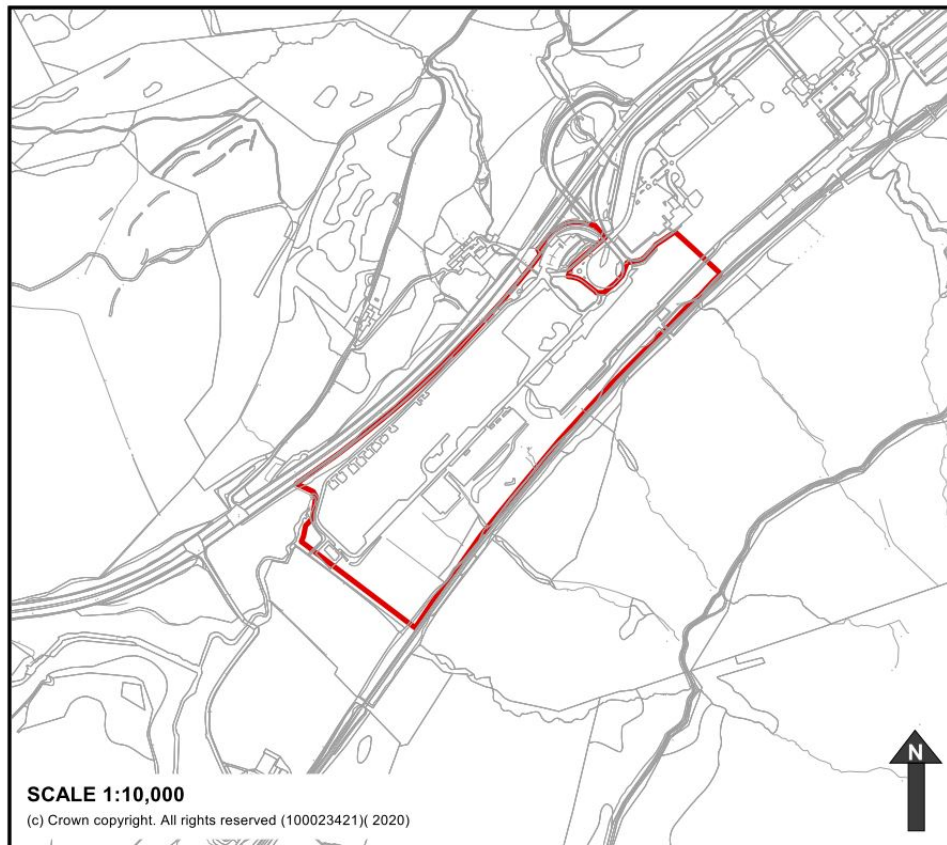
No environment designations cover the site and development is unlikely to have any significant effects on natural heritage, with potential for some enhancements. Site is within an accessible distance of a regular public transport service, with scope to improve provision if the former IBM station re-opens and bus services are encouraged into the site. While the site is not within an accessible distance of local services in Inverkip, some local retail and services are proposed on site.

The site is in a moderate housing demand market area, a developer is attached to the proposal, and the site is the subject of a current planning application and the applicant is confident of delivery.

In light of the above, it is considered that this site should be identified for mixed use development. The site, along with the adjacent CFS33, is therefore included as the Spango Valley Priority Place in the Proposed Plan, with a requirement for a comprehensive masterplan.

Site Details

Site name	Spango Valley (Sanmina site)
Settlement	Greenock
Call for Sites reference	CFS33
Site size (ha)	18.46
Current use	Vacant derelict site
Existing LDP designation	Priority Place



Two separate proposals have been received for this site.

Proposal 1

Submitted by	Advance Construction (GD) Ltd
Proposed Use	Mixed use
Number of houses/floorspace	c.400 - 450 residential units, c. 6000sqm of employment land and some smaller commercial uses yet to be determined.
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p>This mixed use proposal ties in with the adjacent site which is currently subject of planning application 20/0021/IC. Historic assessments have been carried out as part of the Integrated Green Infrastructure Study on the site, but further assessments will follow in due course. While the site is on the periphery of the settlement, it is within walking distance or easily accessible by public transport to all necessary public services. There are known constraints on the site, but it is considered that these can be mitigated.</p> <p>A marketing report submitted with application 20/0021/IC highlighted that there is a market for further residential development in the area, alongside a mix of other uses. A developer is promoting the site – Advance Construction Ltd.</p> <p><u>Supporting Documents</u></p> <p>None</p> <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p>None identified.</p>

Proposal 2

Submitted by	Iceni Projects
Proposed Use	Mixed use
Number of houses/floorspace	Up to 400 residential units (including affordable housing) alongside a new community hub area (incorporating commercial, business and retail uses), as well as areas of landscaping, open space, SUDS, and infrastructure
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p><u>General</u></p> <p>Sanmina-SCI control the site in its entirety. The submitted Development Framework demonstrates that the site could accommodate 300 new family homes, 1,500sqm of retail/commercial/business floorspace, 6.17ha of high quality green and open space, 2.53ha of drainage improvement / SUDs and 0.27ha of other infrastructure (roads, services etc.)</p> <p>The proposal will provide (1) sensitive development through a high level of open space and the retention of key greenspace, which help to tie the site in with the character of the surrounding area and allow for the retention and enhancement of natural habitats; (2) daylighting the existing Spango Burn through the site; (3) opportunity to integrate</p>

	<p>with existing active travel network and public transport facilities and infrastructure, affording future residents of the development access to local amenities and services via sustainable means.</p> <p>Technical studies have demonstrated that the site is free of constraints which would preclude development. Site is located in close proximity to key services, with the town centres of Gourock and Greenock c.4.8km from the site. Any development at the site would comprise a mix of uses and as such it is envisaged the site will provide good access to local services once developed. All utility infrastructure is available on site.</p> <p>Based on a market analysis report, residential-led mixed use development is considered to be the only financially viable proposition for the site as demand for a large-scale industrial/business led development is unlikely to exist due to a combination of wider market factors, location, and current supply within Inverclyde. Discussions between Sanmina and multiple proven developers are at an advanced stage. The proposal will make an important contribution to the delivery of new homes and the ongoing maintenance of a 5-year housing land supply during the Local Development Plan 3 period.</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> • Sanmina -SCI, Inverkip Road, Spango Valley, Greenock Response to LDP 3 Call for Sites • MIR representation • MIR Response Planning Statement • Development Framework Report • Flood Risk Assessment • Site Access Assessment • Commercial Market Analysis <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p><i>Flood Risk</i> – While submitted Flood Risk Assessment found a high risk of flooding from fluvial and pluvial sources, it also demonstrates that this can be effectively remove this risk through detailed design.</p> <p><i>Biodiversity</i> – Development will have positive impacts on biodiversity, flora and fauna through the proposed daylighting of the Spango Burn, as well as through incorporating high quality areas of landscaping, open space and SUDs.</p> <p><i>Soil</i> – A Ground Investigation Report has not identified any ground issues which would preclude development coming forward at the site.</p>
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	<i>Landscape</i> - Development of this brownfield site will not have any adverse impact on the character of the surrounding landscape. The site can be well integrated with the surrounding landscape with topography and existing landscape features marking a clear and defensible landscape boundary. These natural features could be enhanced as part of any development through the positioning of additional landscaping and open space areas.
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Planning History

Planning Applications	No recent applications
Previous Plan - Reporters Comments	Spango Valley is now a large scale redundant brownfield site. It was previously intensively used as an industrial facility by a major multi-national computer company over a long period, and also includes the former site of a secondary school. It enjoys direct access from the A78 trunk road and is served by its own rail station. The employment and financial benefits generated for Inverclyde and the surrounding area would have been substantial, and the local infrastructure supported it. The prospects of another single industrial user of similar scale being attracted to the site are slim. In these circumstances, I consider that it is wholly appropriate that Spango Valley should be identified as a priority place for re-development, with a mix of uses as generally specified in schedule 2 as the preferred strategy for it. This would ensure a significant element of employment generating uses, and also recognise the opportunity for a significant residential component as well, which has been confirmed in representations by a national house-builder. I find no evidence of infrastructure or service constraints which would preclude the type of developments proposed, and the use of this large brownfield site would help to ease the pressures to release other greenfield land for development purposes. Concerns raised regarding potential flooding, subsidence, access, additional planting and amenity would be addressed in the consideration of specific planning applications, and more detailed advice on these matters can also be provided by the council in the proposed supplementary guidance for priority places. The potential use of part of the site for park and ride was identified in representations, and I agree with the council that it would be appropriate that this should also be referred to in schedule 2. The alternative description for the proposed prison on the former Greenock High School site, for which planning permission in principle has been granted, is a matter for the council.

Green Belt boundary issues

Robustness of existing boundary	Formed by the Wemyss Bay – Glasgow railway line and the A78 to the east and west and a robust line of semi-natural woodland to the south.
Robustness of proposed boundary	Would be formed by the Wemyss Bay – Glasgow railway line and the A78 to the east and west and a robust line of semi-natural woodland to the south

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Part of site within medium/high fluvial flood risk area, with potential flood risk from multiple watercourses through site. Surface water flood hazard identified. A Flood Risk Assessment found that identified risks can be mitigated. Green Network Partnership Green Infrastructure Study identifies a number of water related enhancement measures, including daylight watercourses through the site. Known hydraulic constraints within the waste water network
Biodiversity	11	No environmental designations within or in close proximity to the site. Significant areas of semi-natural woodland along some site boundaries. Impact on protected species not known. Opportunities for habitats and green network enhancements identified in Green Network Partnership Green Infrastructure Study for the site.
Climatic Factors	7, 5	Car travel and associated emissions will be minimised as the site is within 400m of bus stop with at least 1 bus per hour between 7am and 7pm on weekdays
Air	13	Short term adverse impact during construction phase, but unlikely to lead to the designation of an AQMA.
Soil	13,4	No carbon rich soils or priority peatland within site. Redevelopment of brownfield site. Potentially contaminated site
Landscape	11	The Green Network Partnership Green Infrastructure Study provides an established landscape framework for the site.
Material Assets	4	Redevelopment of brownfield site
Cultural Heritage	10	Not in close proximity to any designated cultural heritage assets
Population and Health	5, 8, 13	Opportunities to link with nearby active travel network. Site not accessible to local services – 2.7km

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	No – site within settlement boundary but detached from existing built development.
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	Yes – part of the Spango Valley Priority Place

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	<p>Main access from A78 slip roads.</p> <p>Provide pedestrian links to neighbouring residential estates.</p> <p>Provide cycle links through the development to surrounding network.</p> <p>Bus stops should be considered within the site to encourage bus operators to service the site.</p> <p>Suitable visibility should be provided at all accesses.</p> <p>Provide road links which would allow bus services to penetrate the site.</p> <p>Provide pedestrian, cycle and vehicle links to the rail station.</p> <p>Parking should be provided in accordance with approved parking standard.</p> <p>Development should include measures to reduce vehicle speeds within the site.</p> <p>Street lighting to be provided throughout site.</p>
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	<p>Scottish Water confirm that there is sufficient water capacity to service proposed demand, but limited waste water treatment capacity. Further investigations may be required to determine impacts on network capacities.</p> <p>No comments received from other utility providers.</p>
Does the proposal raise any educational capacity issues?	There are potential school capacity issues within the catchments this site is located in.

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	Yes – Advance Construction Ltd and other unnamed developers
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Inverclyde West as a moderate market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	Given that an application has been received for the western part of the Spango Valley site, it is considered more likely that that part of the site would be developed first. Given the scale of development proposed, it cannot be certain that development on this (the Sanmina) part of the site would happen in the period to 2032.

Key Agency Comments

HES	No comment
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NatureScot	The site has an established landscape framework and is on the edge of the existing settlement, offering potential opportunities to improve access to the wider countryside – siting, design and mitigation requirements could usefully be set out in a development brief to guide the detailed design stages.
Scottish Forestry	Woodland South East of the car parking areas has been identified as NFI Broad leaved woodland, NWSS Canopy cover 70 %, NWSS Canopy Structure - 5, NWSS Habitat - Lowland mixed deciduous woodland, NWSS Herbivore Impact - Medium, NWSS Woodland Type - Native Woodland, NWSS Maturity - Mixed. Throughout the site there is a significant amount of trees.
SEPA	<p>Flood Risk - Part of this site lies within the 1 in 200 year floodplain. No development should take place within this area. Multiple watercourses flow through or adjacent to the site. Flood Risk Assessment required. A surface water flood hazard has been identified and should be discussed with FRMA and Scottish Water. Appropriate surface water management measures should be adopted.</p> <p>Water Environment - Spango Burn is a small river waterbody, highly impacted by morphology. The section running through the site is mostly open, but could be improved. There is also a tributary running through the site in culvert, opportunity for deculverting here.</p>
Scottish Water	<p>There is sufficient water treatment works capacity to service proposed demands. Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any, this development has on the existing water treatment network.</p> <p>Inverclyde PFI Treatment works has limited capacity for domestic sites and if any developers are proposing trade-effluent here they would need to work very closely on Scottish Water on this. Please see Scottish Water's advice for Growth Criteria and the Pre-Development Enquiry process. Please advise developers to submit pre-development enquiries as early as possible to start initial site assessments including flow rate assessments and discussions of trade effluent qualities and quantities. As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>Near-by watercourse should support a surface water solution- please see Scottish Water advice and policy on Surface Water.</p> <p>There is a 675mm combined foul pipe within the site boundary - please see Scottish Water advice about infrastructure conflicts</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under 'Climatic factors' topic in the sustainability assessment. It is essential that a masterplan is developed for the full site to ensure a coordinated and comprehensive approach to design, layout and infrastructure provision. In terms of transport this should be accompanied by a robust transport appraisal of the sustainable travel options for the site as a whole. We suggest that this is recognised in the Proposed Plan.
Transport Scotland	Transport Scotland recommends the retention of the preferred option, a comprehensive masterplan to develop the whole site is recommended. A holistic approach to development is required to ensure development is brought forward in a coordinated way. Transport Scotland will engage on the planning application as appropriate, however it is important the LDP sets out a comprehensive and appropriate strategy for the sites.

Other comments received to MIR consultation

In addition to any representations received from the site promoter or key agencies (see above):

- Network Rail seek to engage early with the Council and developers not only in the physical design and construction process of any connections and parking facility but also in assessing the capacity of the station and rail service provision to cater for project demand in travel. In addition, there is a level crossing at Dunrod (WYS line) to the south of Spango Valley and the new Plan should provide strategic guidance to avoid allocating development required to use the level crossing. It is essential that these considerations form part of the Transportation Assessment for the site. We also consider that there is a need to make clear that developer contributions are essential to ensure the delivery of such facilities. The Pooling Approach is to be advocated especially where the development of Spango Valley is likely to require multiple developers to realise its potential.
- 1 representation supported mixed tenure housing on the site.

Summary and conclusion

The Spango Valley (Sanmina) site is not known to have any significant technical constraints which would impact deliverability. Flood risk and potential water and waste water network issues can be addressed at the planning application stage.

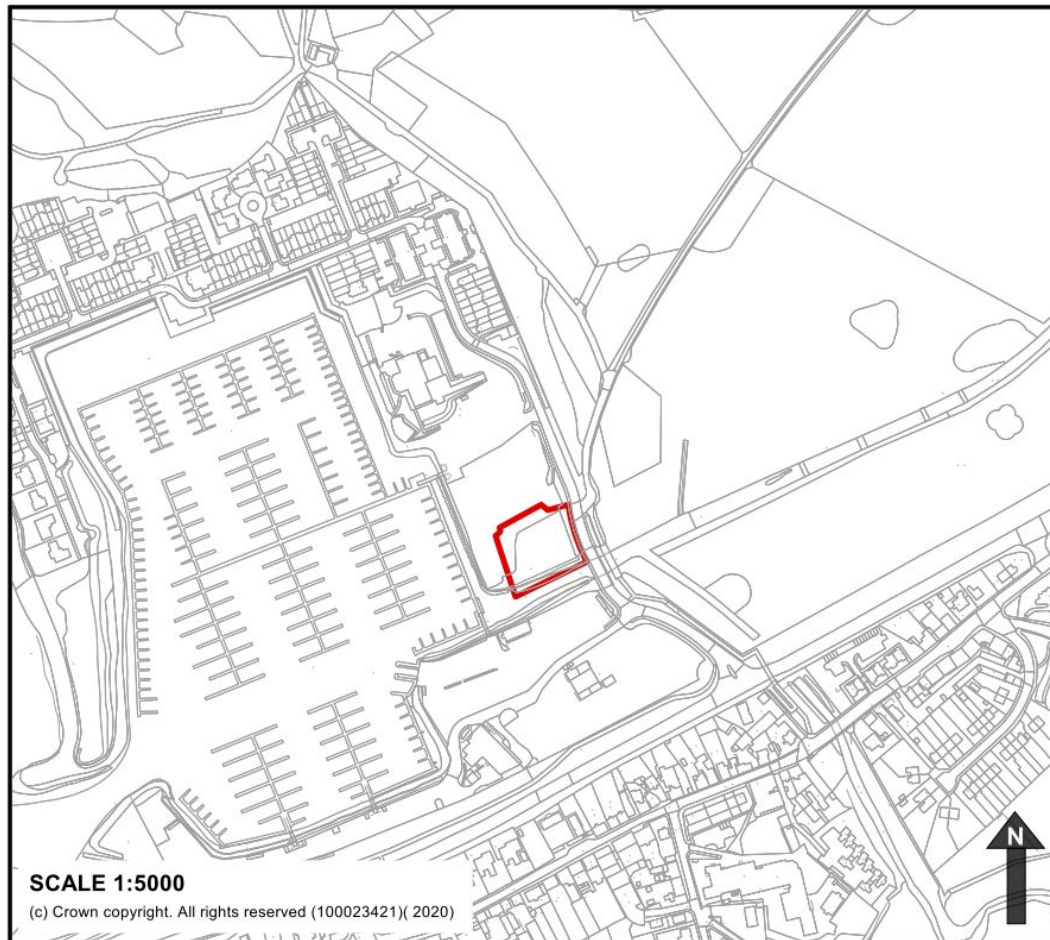
No environment designations cover the site and development is unlikely to have any significant effects on natural heritage, with potential for some enhancements. Site is within an accessible distance of a regular public transport service, with scope to improve provision if the former IBM station re-opens and bus services are encouraged into the site. While the site is not within an accessible distance of local services in Inverkip, some local retail and services are proposed on site.

The site is in a moderate housing demand market area and a developer is attached to the proposal.

In light of the above, it is considered that this site should be identified for mixed use development. The site, along with the adjacent CFS33, is therefore included as the Spango Valley Priority Place in the Proposed Plan, with a requirement for a comprehensive masterplan.

Site Details

Site name	Harbourside, Kip Marina
Settlement	Inverkip
Call for Sites reference	CFS34
Site size (ha)	0.29
Current use	Vacant land
Existing LDP designation	Residential Area



Proposal

Submitted by	Custom Build Homes on behalf of Econekt
Proposed Use	Residential
Number of houses/floorspace	10 apartments
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p>This small vacant brownfield site is situated in a sustainable location within the Inverkip built-up area and within easy walking distance of Inverkip Village. The site is not designated for a specific use and not in the ownership of the Kip Marina, nor does it formally form part of the Marina.</p> <p>This proposal is for up to 10 customisable waterfront apartments or terraced homes, associated landscaping and retention of mature trees. It will help meet identified pent-up demand and make an important contribution to the housing needs of the Inverkip area in accordance with the Council's Local Housing Strategy 2017-22. An allocation for a small custom build housing project will respond positively to Scottish Government policy which recognises the important role that self and custom build housebuilding can play in providing homes, sustaining communities and supporting smaller building companies in both rural and urban areas.</p> <p>All utility connections are available on site and there are no known constraints affecting development. There is developer interest from Econekt in association with Custom Build Homes</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> • Inverkip Demand Appraisal • MIR representation <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p><i>Flood Risk</i> – SEPA flood mapping demonstrates at most that the site has a low-medium risk from fluvial and coastal flooding and no surface water flood risk. Indeed, we note that SEPA Maps show an area in the middle of the site with no flood risk.</p> <p><i>Compatibility of Uses</i> - The Council has provided no evidence to support its assertion that because the site sits adjacent to a boat storage yard, and separate from other residential development, there could be conflict between residential development on the site and marina activities.</p> <p><i>Masterplan</i> - Development of the site would be prejudiced by having to await for an area-wide masterplan to be prepared, over which the landowners have no control. They also have no knowledge of such a plan being considered.</p>

Planning History

Planning Applications	No recent applications.
Previous Plan - Reporters Comments	n/a

Green Belt boundary issues

Robustness of existing boundary	n/a
Robustness of proposed boundary	n/a

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Significant part of site within medium/high fluvial and coastal flood risk areas. Surface water flood hazard identified. Known hydraulic constraints within the waste water network.
Biodiversity	11	In close proximity to the Swallow Brae Local Nature Conservation site, but unlikely to have any significant effects. Some trees on site.
Climatic Factors	7, 5	Car travel and associated emissions will be minimised as the site is within 400m of bus stop with at least 1 bus per hour between 7am and 7pm on weekdays
Air	13	Short term adverse impact during construction phase, but unlikely to lead to the designation of an AQMA.
Soil	13,4	No carbon rich soils or priority peatland within site. Brownfield development
Landscape	11	No significant effects identified
Material Assets	4	Brownfield redevelopment
Cultural Heritage	10	Site adjacent to Ardgowan Designed Landscape. Development would need to take account of potential impacts on the asset.
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. Opportunities to link with adjacent active travel network. Site is accessible to local services – 462m.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes

3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	<p>Main accesses from Harbourside.</p> <p>Provide pedestrian and cycle links to neighbouring residential estates, N753 and A78 overpass.</p> <p>Suitable visibility should be provided at all accesses.</p> <p>Potential capacity issue at junction of A78 and Main Street. Junction Assessment may be required.</p> <p>Parking should be provided in accordance with approved parking standard.</p> <p>Development should include measures to reduce vehicle speeds within the site.</p> <p>Street lighting to be provided throughout site.</p>
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	<p>Scottish Water confirm that there is sufficient water capacity to service proposed demand, but limited waste water treatment capacity. Further investigations may be required to determine impacts on network capacities.</p> <p>No comments received from other utility providers.</p>
Does the proposal raise any educational capacity issues?	There are potential school capacity issues within the catchments this site is located in.

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	Yes – Econekt in association with Custom Build Homes
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Inverclyde West as a moderate market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	Recent housebuilding activity in Inverkip, including at the Marina, suggest the site could be developed within the Plan period.

Key Agency Comments

HES	We note that this potential allocation proposes housing adjacent to the Ardgowan Inventory Designed Landscape (GDL21). We would expect that any development in this location is carefully designed to take into account impacts on the setting of the Inventory Designed Landscape.
NatureScot	No comment
Scottish Forestry	Few trees found on this site
SEPA	<p>Flood Risk - A substantial part of the site may lie within the 1 in 200 year floodplain. No development should take place within this area. Minor watercourse flows in proximity to allocation. Flood Risk Assessment required. A surface water flood hazard has been identified and should be discussed with FRMA and Scottish Water. Appropriate surface water management measures should be adopted.</p> <p>Water Environment - No comment</p>
Scottish Water	<p>There is sufficient water treatment works capacity to service proposed demands. Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any, this development has on the existing water treatment network.</p> <p>Inverclyde PFI Treatment works has limited capacity for domestic sites and if any developers are proposing trade-effluent here they would need to work very closely on Scottish Water on this. Please see Scottish Water's advice for Growth Criteria and the Pre-Development Enquiry process. Please advise developers to submit pre-development enquiries as early as possible to start initial site assessments including flow rate assessments and discussions of trade effluent qualities and quantities. As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>Near-by watercourse should support a surface water solution- please see Scottish Water advice and policy on Surface Water.</p> <p>There is a 300 mm surface water pipe within the boundary of the site – please see Scottish Water advice about infrastructure conflicts</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under Climatic factors topic in the SEA summary.
Transport Scotland	No comment

Other comments received to MIR consultation

No further comments received

Summary and conclusion

The Harbourside site is not known to have any significant technical constraints which would impact deliverability. Flood risk and potential water and waste water network issues can be addressed at the planning application stage.
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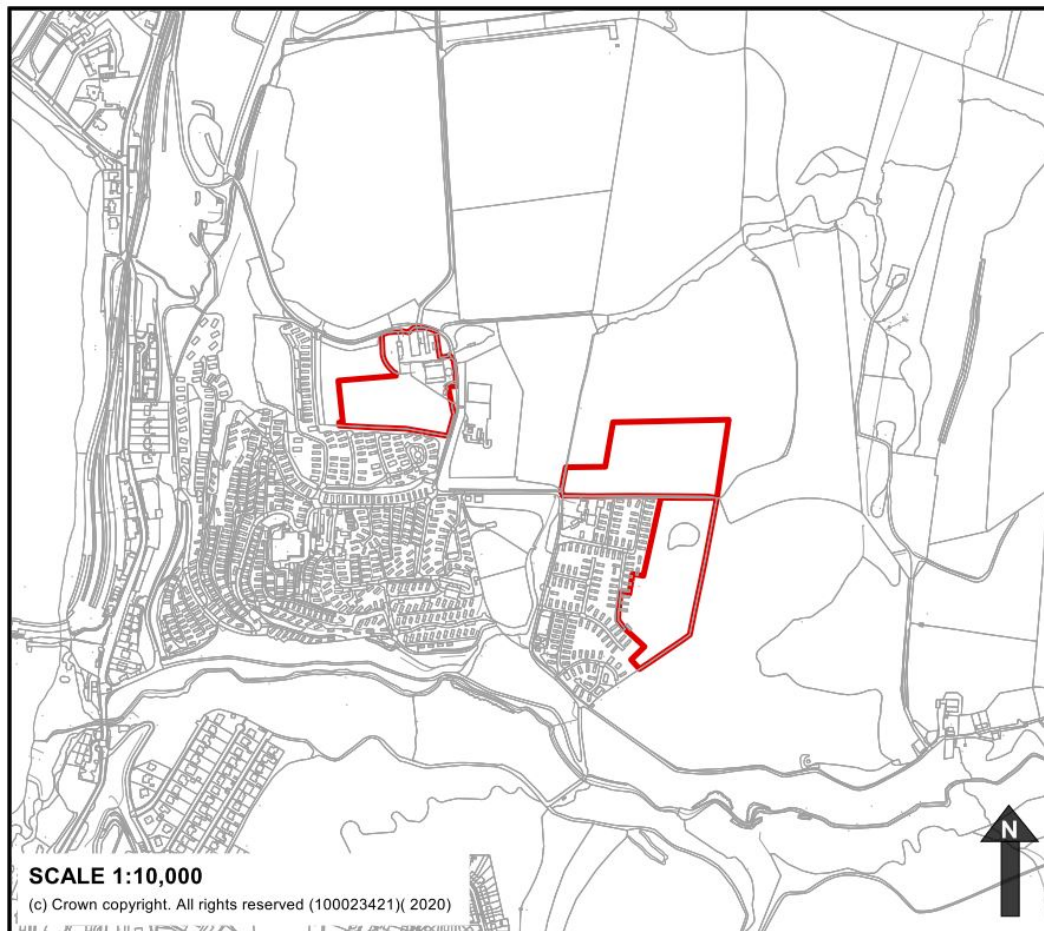
While the site lies close to an LNCS and a Garden and Designed Landscape, development is unlikely to have any adverse effects. Development of this brownfield site would be contained within the urban area. As the site is part of the Kip Marina area, adjacent to a boat storage yard and separate from other residential development, there could be conflict between residential development on the site and marina activities. Site is within an accessible distance of a regular public transport service, including a train service, and local services in Inverkip.

It is considered that further residential development at the marina should form part of an area wide masterplan.

With regard to the above and the findings of the Housing Land Technical Report 2021, it is not considered appropriate or necessary to allocate this site for housing development in the Proposed Local Development Plan.

Site Details

Site name	Kelly Mains Farm
Settlement	Wemyss Bay
Call for Sites reference	CFS36
Site size (ha)	6.7
Current use	Part consented caravan/mobile home site and part agricultural
Existing LDP designation	Green Belt



Proposal

Submitted by	Pennine Leisure Ltd
Proposed Use	Caravan/mobile home site.
Number of houses/floorspace	Not identified
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p>The first phase of this proposal has already been granted planning approval 19/0135/IC. The ecological, landscape and transport impact assessments submitted with the application cover and support the proposal for inclusion in LD3. Pennine Leisure, a proven developer, is interested in the site. All utility connections are available.</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> • Preliminary Ecological Assessment • Landscape and Visual Impact Assessment • Transport Assessment <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p><i>Flood Risk</i> – The proposed site does not form part of a functional floodplain for a 1:200 year flood event. For a 1:1000 year flood event, water could make its way towards the site and the proposed landraising will mitigate this risk.</p> <p><i>Biodiversity</i> – Preliminary Ecological Assessment found that habitats and plant species within the site boundary are widespread and common throughout the central belt. It recommended that mature trees, with potential suitability to support roosting bats, are retained as part of the proposed development, as per the mitigation hierarchy. Optional biodiversity enhancement measures were identified. The recommended Barn Owl and Bat Roost surveys have been undertaken.</p> <p><i>Landscape</i> – The Landscape and Visual Impact Appraisal concludes that the site easily has the capacity to ‘absorb’ an extension to the existing Kellybank Caravan Park in the short term. Where impacts may be generated, these can be appropriately addressed through the proposed mitigation strategy.</p>

Planning History

Planning Applications	19/0135/IC – Planning application for caravan/mobile homes granted on western part. Approved on 17/1/2020
Previous Plan – Reporters Comments	n/a

Green Belt boundary issues

Robustness of existing boundary	n/a - The sites sits within the green belt.
Robustness of proposed boundary	n/a - The sites sits within the green belt.

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Potential flood risk from minor watercourse along site boundary. Surface water flood hazard identified. Known hydraulic constraints within the waste water network.
Biodiversity	11	No environmental designations on or adjacent to the site. While there is existing semi-natural woodland in the north-western pocket of the site, it is noted that this area will retained and incorporated into the development. It is further noted that a Preliminary Ecological Appraisal and subsequent protected species surveys have been undertaken.
Climatic Factors	7, 5	Car travel and associated emissions will be minimised as the site is within 400m of bus stop with at least 1 bus per hour between 7am and 7pm on weekdays
Air	13	Short term adverse impact during construction phase, but unlikely to lead to the designation of an AQMA.
Soil	13,4	No carbon rich soils or priority peatland within site. Development of greenfield land
Landscape	11	Site is elevated and sloping. While there is potential for development to have an adverse impact on the setting of Muirshiel Regional Park, it is noted that the Landscape and Visual Impact Appraisal concludes that any impacts can be effectively addressed through the proposed mitigation strategy.
Material Assets	4	Greenfield development
Cultural Heritage	10	Not in close proximity to any designated cultural heritage designations.
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. Opportunities to link with adjacent active travel network. Site not accessible to local services – 1.9km.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	No
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	There are no publically adopted roads and the surrounding roads require upgrading.
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	Scottish Water confirm that there is sufficient water capacity to service proposed demand, but limited waste water treatment capacity. Further investigations may be required to determine impacts on network capacities. No comments received from other utility providers.
Does the proposal raise any educational capacity issues?	N/a

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	Site owner to develop.
Is there evidence of housing demand/need in the area proposed?	n/a
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	n/a

Key Agency Comments

HES	No comment
NatureScot	This site is composed of three pockets, all of which are within the Clyde Muirshiel Regional Park. Development here would have an adverse impact on the setting of the Regional Park. If allocated, any development proposals will require careful consideration to ensure that it does not undermine

	the Park objectives. Existing semi-natural woodland in the north-western pocket should be retained and contribute to a landscape framework. There may also be opportunities to incorporate nature-based tourism.
Scottish Forestry	Few trees found on this site
SEPA	<p>Flood Risk - A minor watercourse flows along the site boundary which could represent a potential flood risk. A basic FRA, consisting of topographic information in the first instance and a detailed layout plan will be required. A surface water flood hazard has been identified and should be discussed with FRMA and Scottish Water. Appropriate surface water management measures should be adopted.</p> <p>Water Environment - Site located on edge of Inverclyde SNL area, even a small development out here could have implications for sewerage capacity</p>
Scottish Water	<p>There is sufficient water treatment works capacity to service proposed demands. Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any, this development has on the existing water treatment network.</p> <p>Inverclyde PFI Treatment works has limited capacity for domestic sites and if any developers are proposing trade-effluent here they would need to work very closely on Scottish Water on this. Please see Scottish Water's advice for Growth Criteria and the Pre-Development Enquiry process. Please advise developers to submit pre-development enquiries as early as possible to start initial site assessments including flow rate assessments and discussions of trade effluent qualities and quantities. As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>Near-by watercourse should support a surface water solution- please see Scottish Water advice and policy on Surface Water.</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under 'Climatic factors' topic in the sustainability assessment.
Transport Scotland	No comment

Other comments received to MIR consultation

<p>In addition to any representations received from the site promoter or key agencies (see above):</p> <ul style="list-style-type: none"> 1 representation supported the proposal if requirement exists for land for caravans/mobile homes

Summary and conclusion

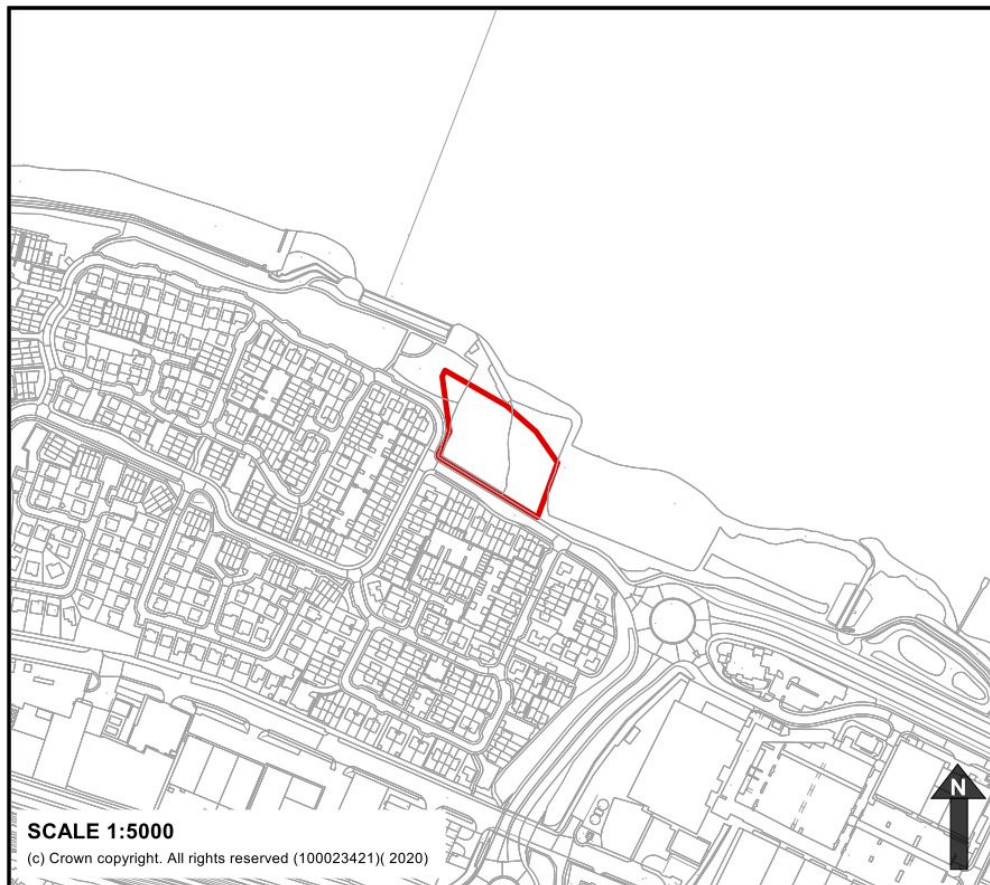
<p>The Kelly Mains site is not known to have any significant technical constraints which would impact deliverability. Roads, flood risk and potential water and waste water network issues can be addressed at the planning application stage.</p>
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No environmental designations cover the site and development is unlikely to have any significant effects on natural heritage, subject to mitigation. Although the site is sloping in parts, it is considered that development could be accommodated, subject to mitigation, without significant adverse impacts. Accessibility to the site for the proposed tourism use is considered acceptable.

The site is not included as a development opportunity in the Proposed Plan as it is considered that the proposal would more appropriately be assessed through the planning application process.

Site Details

Site name	Kingston Dock
Settlement	Port Glasgow
Call for Sites reference	CFS42
Site size (ha)	0.61
Current use	Open space
Existing LDP designation	Open space



Proposal

Submitted by	Peel Land & Property (Ports) Ltd
Proposed Use	Residential
Number of houses/floorspace	19 units
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p>The proposed site has historically been zoned for development. The site, which is the final stage of the phased redevelopment of the waterfront, is bounded by recently completed residential developments to the south and east and as such represents an opportunity to complete the development of the remaining brownfield land. The initial assessment of the proposal against the SEA, Transport and Accessibility, and Infrastructure and Deliverability criteria are not applicable as the site was assessed as part of planning application 18/0260/IC and no objections from statutory consultees were received.</p> <p>All other phases of Kingston development sold very well and the location is very popular for residential development. There is confirmed housebuilder interest and commitment to build out. Furthermore, there is clearly demand for residential development within this area given the recent identification of a shortfall in Inverclyde Council's housing land supply. Given the outcome of the Court of Session Decision in July 2020, which identified a shortfall in Inverclyde Councils housing land supply, this site should be brought forward as a residential development site within the emerging Inverclyde Local Development Plan 3.</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> • Proposed Plan and Environmental Report response form (June 2018) • Letter of developer interest • Letter from Peel Land and Property • MIR representation <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p><i>Flood Risk</i> – A Flood Risk Assessment submitted as part of Planning Application 18/0260/IC addressed this issue.</p> <p><i>Landscape</i> –No objections were received to planning application 18/0260/IC.</p> <p><i>Population and Health</i> - The overall development has a significant area of managed open space on the front which include walkways, children's play area, parkland and planted areas. The majority of the proposed site is overgrown, unmanaged, and inaccessible to the public and attracts anti-social behaviour. As such it is not considered to provide quality open space. As noted by the Council, the area is not formally landscaped and as such the majority of the site is not used by the public as open space.</p>

Planning History

Planning Applications	18/0260/IC- Planning application for housing. Refused on 18/6/2019
Previous Plan - Reporters Comments	<p>This is a reclaimed brownfield site to the west of Port Glasgow, between the completed residential development at Kingston Dock and the Firth of Clyde. It is currently an open area, with no formal landscaping, with sweeping views of the Clyde to the east and west. It had originally been included in the site masterplan as an area for retail and commercial development, but in LDP 2014 the site was allocated as part of a larger residential opportunity with the reference r13. The site is now identified in this plan as open space under Policy 35, where the loss of open space is not supported unless open space of an equal or enhanced quality is provided within the development or its vicinity. The representation is seeking the continued inclusion of the site within Schedule 4 of the plan as a residential development opportunity, stating that it has already been identified as suitable for residential development; that it would be an opportunity to complete the development; that there is significant open space in the development already; it is required to maintain economic viability of the overall development; a change in the designation of the site could lead to a loss of confidence in other longer term regeneration projects; and that the site is of real interest to housebuilders. The council explains that since the development at Kingston Dock was completed and LDP 2014 adopted, Lithgow Way and Iron Way have become the northern boundary of the developed area, with the land to the north being open space and a buffer to the Firth of Clyde. The open space accommodates the waterfront cycle way and footpath and forms part of the setting of the Port Glasgow waterfront, affording views to the east and west on the Firth of Clyde. On my site visit, which was on a showery winter morning, I observed the use of the open space and the subject site. It was busy with both walkers and cyclists, with families and young children and appeared to be well used. The open views to the north, east and west across the Firth are a feature of the area and enhance the walking / cycle route and the open space itself. I also note the visually prominent nature of the site when approaching by cycle or on foot from the east and west and by car from the east. The site if developed would also be prominent in views south from the Firth. The potential negative impact on the viability of the site overall is not quantified or specified in the representation, however I appreciate that the removal of an allocation for a land use that generates income could be unsettling for owners and investors. In this instance, I am satisfied that the circumstances of the site, the pattern of completed development and value of the open space both visually and functionally provide justification for the change in plan allocation. LDP 14 had allocated the site as providing up to 140 private homes. Sufficient land has been allocated to meet the all-tenure housing land requirement for Inverclyde, for the whole of the plan period, without the inclusion of this site, a matter fully discussed at Issue 5 of this examination. I am satisfied that the site now performs an important open space function and visual setting for Port Glasgow and that its development for residential or indeed any other purpose would not be in the best interest of the Port Glasgow area and the site locality. I conclude that no amendment to the plan is required.</p>

Green Belt boundary issues

Robustness of existing boundary	n/a
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Robustness of proposed boundary	n/a
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Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Small part of site within the medium/high coastal flood risk area. It is noted that the submitted Flood Risk Assessment and Drainage Impact Assessment were acceptable to the Council and SEPA. Known hydraulic constraints within the waste water network.
Biodiversity	11	No environmental designations within the site or in close proximity.
Climatic Factors	7, 5	Car travel and associated emissions will be minimised as the site is within 400m of bus stop with at least 6 buses per hour between 7am and 7pm on weekdays. Also within 800m of a rail station.
Air	13	Short term adverse impact during construction phase, but unlikely to lead to the designation of an AQMA.
Soil	13,4	No carbon rich soils or priority peatland within site. Development of brownfield land
Landscape	11	Site forms part of the public vista of the River Clyde and contributes to the setting of the Greenock waterfront. Development would have significant adverse effects on landscape setting.
Material Assets	4	Brownfield development
Cultural Heritage	10	Not in close proximity to any designated cultural heritage designations.
Population and Health	5, 8, 13	Development would result in the loss of open space. While new open space provision would be required, it is unlikely that the scenic location and value of the existing space could be replaced in close proximity to the site. It is noted that the proposal will retain and incorporate the existing core path and cycle path into the development. Site accessible to local services – 268m.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	<p>Suitable visibility should be provided at all accesses.</p> <p>Provide cycle links through the development to surrounding network.</p> <p>Provide pedestrian links to bus stops in neighbouring communities.</p> <p>Provide cycle links to the N75 Cycle Route.</p> <p>Parking should be provided in accordance with approved parking standard.</p> <p>Development should include measures to reduce vehicle speeds within the site.</p> <p>Street lighting to be provided throughout site.</p>
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	<p>Scottish Water confirm that there is sufficient water capacity to service proposed demand, but limited waste water treatment capacity. Further investigations may be required to determine impacts on network capacities.</p> <p>No comments received from other utility providers.</p>
Does the proposal raise any educational capacity issues?	None identified

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	Yes – AS Homes Scotland and 3 other unnamed developers.
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Inverclyde East as a poor market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	Yes. The adjoining area was recently successfully developed.

Key Agency Comments

HES	No comment
NatureScot	We recommend that nature-based solutions are integrated into the development design, providing multiple benefits including recreational space and climate change mitigation.
Scottish Forestry	Few trees and shrubs found in this area.
SEPA	<p>Flood Risk - A small part of this site lies within the 1 in 200 year coastal floodplain. No development should take place within this area. A basic FRA, consisting of topographic information in the first instance and a detailed layout plan will be required.</p> <p>Water Environment – No comment</p>
Scottish Water	<p>There is sufficient water treatment works capacity to service proposed demands. Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any, this development has on the existing water treatment network.</p> <p>Inverclyde PFI Treatment works has limited capacity for domestic sites and if any developers are proposing trade-effluent here they would need to work very closely on Scottish Water on this. Please see Scottish Water's advice for Growth Criteria and the Pre-Development Enquiry process. Please advise developers to submit pre-development enquiries as early as possible to start initial site assessments including flow rate assessments and discussions of trade effluent qualities and quantities. As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>Near-by watercourse should support a surface water solution- please see Scottish Water advice and guidance on Surface Water.</p> <p>There is a surface water pipe within the boundary of the pipe – please see Scottish Water advice on infrastructure conflicts.</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under Climatic factors topic in the SEA summary.
Transport Scotland	No comment

Other comments received to MIR consultation

No further comments received

Summary and conclusion

The Kingston Dock site is not known to have any significant technical constraints which would impact deliverability.
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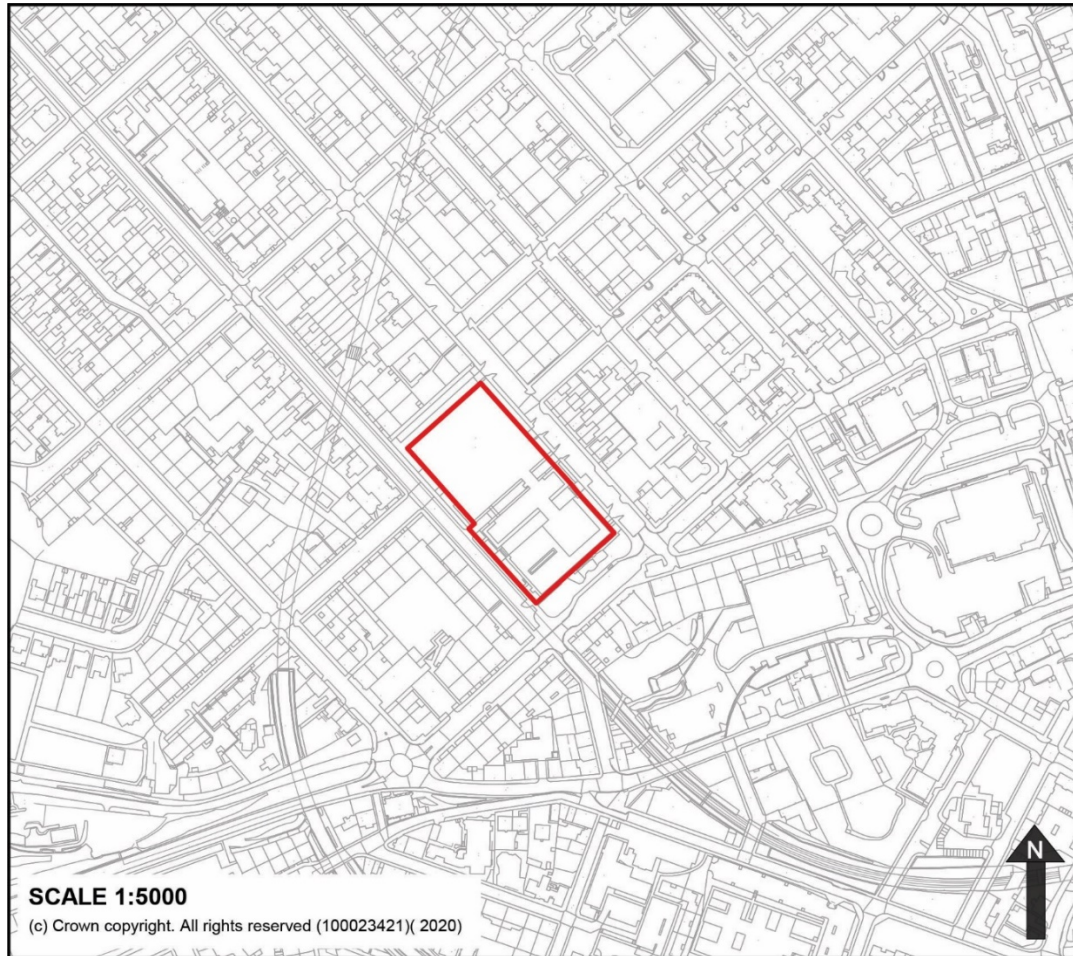
No environmental designations cover the site and development unlikely to have any significant effects on wider natural heritage interest. Due to the site forming part of the public vista of the River Clyde that contributes to the setting of the Greenock waterfront, development would have significant adverse effects on landscape setting. It would also result in the loss of valued open space. Site is which is within an accessible distance of a regular public bus and rail service and local services in Port Glasgow.

While the site is in an area that Homes for Scotland has identified as a poor market area, a developer has confirmed interest in the site.

With regard to the above and the findings of the Housing Land Technical Report 2021, it is not considered appropriate or necessary to allocate this site for housing development in the Proposed Local Development Plan.

Site Details

Site name	Finnart Street
Settlement	Greenock
Call for Sites reference	CFS43
Site size (ha)	1.15
Current use	College
Existing LDP designation	Town centre



Proposal

Submitted by	West College Scotland
Proposed Use	Residential
Number of houses/floorspace	140 units
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p>The College's proposed relocation to the Harbours would release the existing Finnart Street site for future development, including housing. The College has undertaken an initial development capacity study which, based on reasonable assumptions about scale and density and meeting the placemaking criteria in the LDP, found the proposed site would be suitable for 140 residential units. Allocation of this site would be effective.</p> <p>The College agrees with the summary assessment in the Initial Proposed Development Site Assessment.</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> • MIR representation <p><u>Comments relating to specific issues raised in the Initial Site Assessment.</u></p> <p>None identified</p>

Planning History

Planning Applications	No recent planning applications
Previous Plan – Reporters Comments	<p>West College Scotland has made a submission objecting to the omission of the 1.6- hectare site at Finnart Street in Greenock town centre from the schedule of housing development opportunity sites in the plan. The proposed relocation of the college could mean that the site is available for development which could include housing. The council advises that the site has not been assessed through the plan process or Strategic Environmental Assessment, as it had not been submitted until the proposed plan consultation stage. The college has provided supporting information on its preferred option of relocating to a single campus at East India Dock and has representations to Issues 1, 4 and 10 of this examination. Conclusions on submissions to those Issues are found in the relevant sections of this report. In summary, it has been concluded that an educational institution is unlikely to be compatible with the preferred strategy of a mixed use development, due to the large scale land requirement. I find that as the site is within Greenock town centre, should it become available for redevelopment in the plan period, then housing is a use that would be acceptable subject to compliance with the policies of the plan. At present, there is no clear timeline for the relocation of the campus. I am satisfied that the site's current allocation in the plan does not preclude appropriate redevelopment including for housing. The principle of the relocation of the college is accepted and the council intends to include the proposed facility in the plan at Schedule 5 Community Facilities Opportunities, but with the actual location to be identified. This plan period is ten years. Site assembly, acquisition, consent and construction of such a project may take up</p>

	to and beyond ten years, while the current facilities would need to remain operational until any new facility opened. The sale and consent process at the existing college sites could be concurrent, but site clearance and construction could not begin until the new facility was operational. Given the uncertainty that timeline presents, I find that inclusion in this plan as a housing development opportunity would not be appropriate without evidence that the site is or could become an effective housing site in the plan period. I conclude that no modification to the plan is required.
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Green Belt boundary issues

Robustness of existing boundary	n/a
Robustness of proposed boundary	n/a

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Small area of medium surface water flood risk within central part of site. Known hydraulic constraints within the waste water network.
Biodiversity	11	No environmental designations within or in close proximity to site.
Climatic Factors	7, 5	Car travel and associated emissions would be minimised as site is within 400m of bus stop with at least 6 buses per hour between 7am and 7pm on weekdays. Also within 800m of a rail station.
Air	13	Short term impact during construction phase, but unlikely to lead to designation of an AQMA
Soil	13,4	Redevelopment of brownfield site
Landscape	11	No significant effects identified
Material Assets	4	Redevelopment of brownfield site
Cultural Heritage	10	In close proximity to two B listed buildings on Kelly Street.
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. Site 100m from core path network and within Greenock Town Centre.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes

3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	Yes

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	Main access from Finnart Street and/ or Newton Street. Provide pedestrian links to neighbouring residential estates and public transport stops and station. Suitable visibility should be provided at all accesses and driveways. Parking should be provided in accordance with approved parking standard. Development should include measures to reduce vehicle speeds within the site to 20mph. Street lighting to be provided throughout site...
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	Scottish Water confirm that there is sufficient water capacity to service proposed demand, but limited waste water treatment capacity. Further investigations may be required to determine impacts on network capacities. No comments received from other utility providers.
Does the proposal raise any educational capacity issues?	None identified

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	None identified
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Inverclyde East as a poor market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	Assuming the relocation of the College, it is anticipated that this site could be successfully developed in the period to 2032.

Key Agency Comments

HES	No comment
NatureScot	No comment

Scottish Forestry	Edging trees bordering the site.
SEPA	No comment
Scottish Water	<p>There is sufficient water treatment works capacity to service proposed demands. Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any, this development has on the existing water treatment network.</p> <p>Inverclyde PFI Treatment works has limited capacity for domestic sites and if any developers are proposing trade-effluent here they would need to work very closely on Scottish Water on this. Please see Scottish Water's advice for Growth Criteria and the Pre-Development Enquiry process. Please advise developers to submit pre-development enquiries as early as possible to start initial site assessments including flow rate assessments and discussions of trade effluent qualities and quantities. As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>There is a 375 mm combined waste pipe running through the boundary of the site. When working with existing assets please consider required stand-off distances and access requirements. Please see Scottish Water Asset Policy Standard Water Mains Protection Distance policy document.</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under 'Climatic factors' topic in the sustainability assessment.
Transport Scotland	No significant impact on the trunk road.

Other comments received to MIR consultation

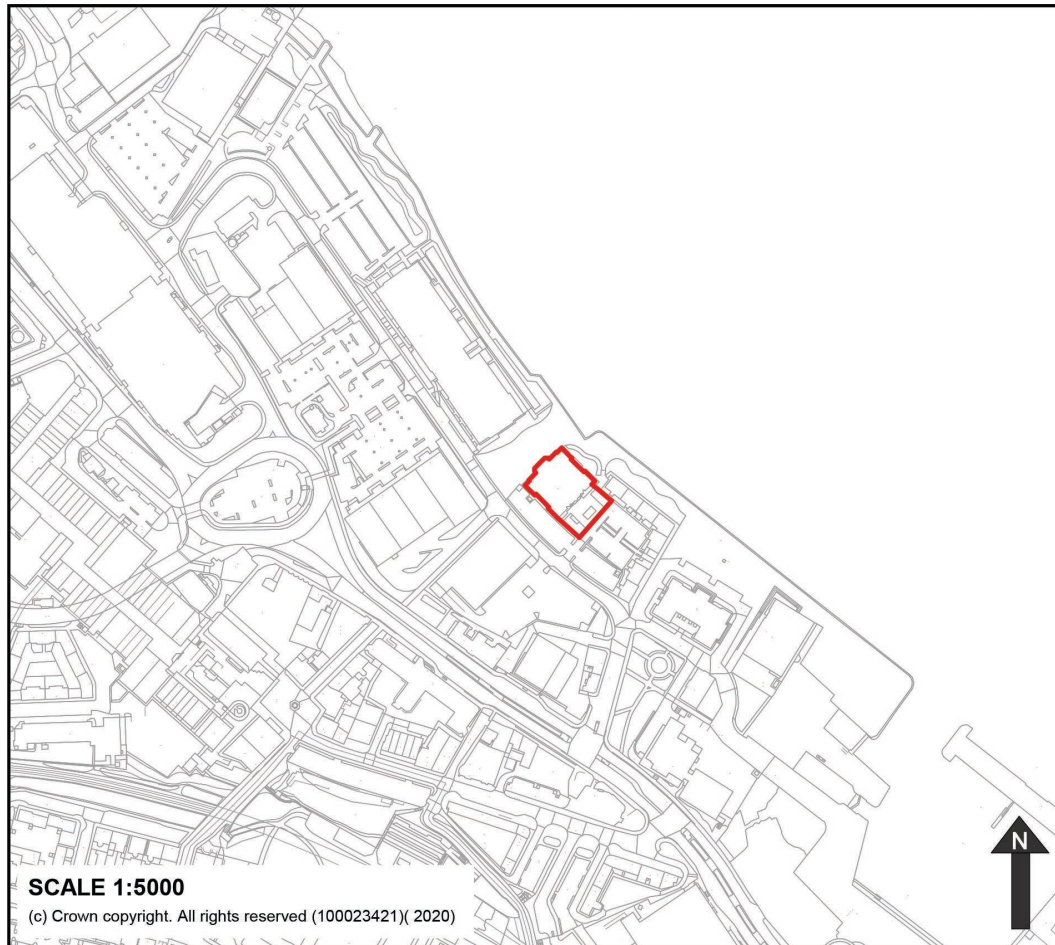
No further comments received

Summary and conclusion

<p>The Finnart street site is not known to have any significant technical constraints which would impact deliverability. Flood risk and potential water and waste water network issues can be addressed at the planning application stage.</p> <p>No environmental designations cover the site, but design would need to take account of its relatively close proximity to listed buildings and the Greenock West End Conservation Area.</p> <p>The site is within an accessible distance of a regular bus and train service, and local services in Greenock. It presents an infill development opportunity in a central urban area which, due to its close proximity to the popular Greenock west end residential area, is considered to have market demand.</p> <p>While the site is considered suitable for housing, it is noted that the relocation of the College has not been confirmed and, as such, a residential allocation would be premature at this time. The site is therefore not included as a housing development opportunity in the Proposed Plan.</p>

Site Details

Site name	Custom House Way
Settlement	Greenock
Call for Sites reference	CFS44
Site size (ha)	0.22
Current use	College
Existing LDP designation	Town Centre



Proposal

Submitted by	West College Scotland
Proposed Use	Residential
Number of houses/floorspace	65 units
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p>The College's proposed relocation to the Harbours would release the existing Custom House Way site for future development, including housing. The College has undertaken an initial development capacity study which, based on reasonable assumptions about scale and density and meeting the placemaking criteria in the LDP, found the proposed site would be suitable for 65 residential units. All services are available and allocation of this site would be effective.</p> <p>The College agrees with the summary assessment in the Initial Proposed Development Site Assessment.</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> • MIR representation <p><u>Comments relating to specific issues raised in the Initial Site Assessment.</u></p> <p>None identified</p>

Planning History

Planning Applications	No recent applications
Previous Plan – Reporters Comments	<p>West College Scotland has made a submission objecting to the omission of its campus at Customhouse Way in Greenock Town Centre from the schedule of housing development opportunity sites in the plan. The proposed relocation of the college could mean that the site is available for development which could include housing. The council advises that the site has not been assessed through the plan process or Strategic Environmental Assessment, as it had not been submitted until the proposed plan consultation stage. The college has provided supporting information on its preferred option of relocating to a single campus at East India Dock and has representations to Issues 1, 4 and 10 of this examination. Conclusions on submissions to those Issues are found in the relevant section of this report. In summary, it has been concluded that an educational institution is unlikely to be compatible with the preferred strategy of a mixed use development, due to the large scale land requirement. I find that as the site is within Greenock Town Centre, should it become available for redevelopment in the plan period, then housing is a use that would be acceptable subject to compliance with the policies of the plan. At present, there is no clear timeline for the relocation of the campus. I am satisfied that the site's current allocation in the plan does not preclude appropriate redevelopment including for housing. The principle of the relocation of the college is accepted and the council intends to include the proposed facility in the plan at Schedule 5 Community Facilities Opportunities, but with the actual location to be</p>

	identified. This plan period is ten years. Site assembly, acquisition, consent and construction of such a project may take up to and beyond ten years, while the current facilities would need to remain operational until any new facility opened. The sale and consent process at the existing college sites could be concurrent, but site clearance and construction could not begin until the new facility was operational. Given the uncertainty that timeline presents, I find that inclusion in this plan as a housing development opportunity would not be appropriate without evidence that the site is or could become an effective housing site in the plan period. I conclude that no modification to the plan is required.
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Green Belt boundary issues

Robustness of existing boundary	n/a
Robustness of proposed boundary	n/a

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Adjacent to medium coastal and surface water flood risk areas and the Clyde Estuary Outer water body. Known hydraulic constraints within the waste water network.
Biodiversity	11	No environmental designations within or in close proximity to site.
Climatic Factors	7, 5	Car travel and associated emissions would be minimised as site is within 400m of bus stop with at least 6 buses per hour between 7am and 7pm on weekdays. Also within 800m of a rail station.
Air	13	Short term impact during construction phase, but unlikely to lead to designation of an AQMA
Soil	13,4	Redevelopment of brownfield site
Landscape	11	Redevelopment of brownfield site in urban area
Material Assets	4	Redevelopment of brownfield land
Cultural Heritage	10	In close proximity to A and B listed buildings/features at Customhouse Place and Quay. Careful design required to ensure development does not impact on the setting of these assets.
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. Opportunities to link with adjacent core path network. Site within Greenock Town Centre.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	Yes

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	<p>Main access from Custom House Way.</p> <p>Provide pedestrian links to area and public transport stops and station.</p> <p>Suitable visibility should be provided at all accesses and driveways.</p> <p>Provide pedestrian/ cycle links towards Core Path Network.</p> <p>Parking should be provided in accordance with approved parking standard.</p> <p>Development should include measures to reduce vehicle speeds within the site to 20mph.</p> <p>Street lighting to be provided throughout site.</p>
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	<p>Scottish Water confirm that there is sufficient water capacity to service proposed demand, but limited waste water treatment capacity. Further investigations may be required to determine impacts on network capacities.</p> <p>No comments received from other utility providers.</p>
Does the proposal raise any educational capacity issues?	None identified

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	None identified
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Inverclyde East as a poor market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	Assuming the relocation of the College, it is anticipated that this site could be successfully developed in the period to 2032.

Key Agency Comments

HES	The Council are proposing to allocate a residential development of 65 units on the James Watt college site adjacent to the Category A listed Custom House (LB34100). It is not clear whether the existing college building will be retained. Any development in this sensitive location should take into account potential impacts on the understanding, experience and historic interest of the A-listed Custom House (LB34100).
NatureScot	This site already appears to have been developed, however, there may be opportunities to create active frontages onto the River Clyde and connect people with the river. Any opportunities for placemaking should also be considered in any development proposals.
Scottish Forestry	Edging trees bordering the site.
SEPA	No comment
Scottish Water	<p>There is sufficient water treatment works capacity to service proposed demands. Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any, this development has on the existing water treatment network.</p> <p>Inverclyde PFI Treatment works has limited capacity for domestic sites and if any developers are proposing trade-effluent here they would need to work very closely on Scottish Water on this. Please see Scottish Water's advice for Growth Criteria and the Pre-Development Enquiry process. Please advise developers to submit pre-development enquiries as early as possible to start initial site assessments including flow rate assessments and discussions of trade effluent qualities and quantities. As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>There is a near-by watercourse which should support a surface water solution- please see Scottish Water's Surface Water Policy.</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under 'Climatic factors' topic in the sustainability assessment.
Transport Scotland	No significant impact on the trunk road.

Other comments received to MIR consultation

No further comments received

Summary and conclusion

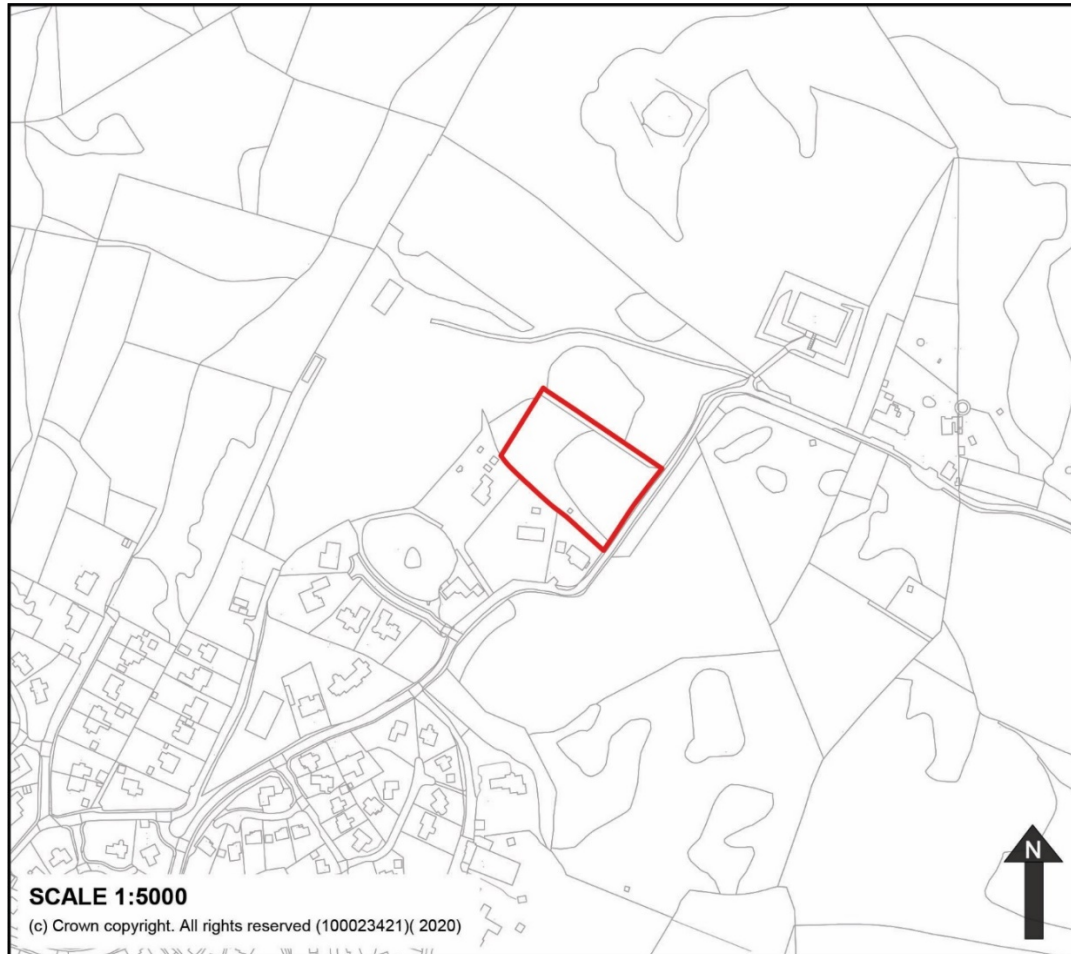
<p>The Custom House Quay site is not known to have any significant technical constraints which would impact deliverability. Flood risk and potential water and waste water network issues can be addressed at the planning application stage.</p> <p>No environmental designations cover the site, but careful design required to avoid adverse impacts on the nearby A and B listed buildings/features at Customhouse Place and Quay.</p>
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The site is within an accessible distance of a regular bus and train service, and local services in Greenock. It presents an infill development opportunity in a waterfront location in central urban area which is considered to have market demand.

It is noted that the relocation of the College has not been confirmed and, as such, a residential allocation would be premature at this time. The site is therefore not included as a housing development opportunity in the Proposed Plan.

Site Details

Site name	Misty Law, West Glen Road
Settlement	Kilmacolm
Call for Sites reference	CFS45
Site size (ha)	0.72
Current use	Agricultural
Existing LDP designation	Green Belt



Proposal

Submitted by	Verbal submission
Proposed Use	Residential
Number of houses/floorspace	TBC
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	None provided.

Planning History

Planning Applications	No recent applications
Previous Plan – Reporters Comments	n/a

Green Belt boundary issues

Robustness of existing boundary	Formed by line of mature trees.
Robustness of proposed boundary	Formed by tall conifers

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Known hydraulic constraints within the waste water network.
Biodiversity	11	No environmental designations within site. Glen Moss SSSI lies to the south, but development unlikely to impact on it. Potential adverse effect on mature trees along site boundaries
Climatic Factors	7, 5	Likely to increase car travel and associated emissions as site is not within an accessible distance of public transport provision
Air	13	Short term impacts during the construction phase, but unlikely to lead to the designation of an AQMA
Soil	13,4	No carbon rich soils or priority peatland within site. Development of greenfield land

Landscape	11	Site on edge of Kilmacolm but physically and visually detached from it. Development could increase pressure for further green belt release to the north, thereby eroding the rural character.
Material Assets	4	Development of greenfield land
Cultural Heritage	10	Not in close proximity to any cultural heritage assets.
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, including open space. Site 448m from active travel network and within accessible distance of local services – 568m.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	No
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Kilmacolm/Quarrier's Village LNCS Assessment Summary (2017)

Site not included in the assessment

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	<p>Main access from West Glen Road.</p> <p>Suitable visibility should be provided from access.</p> <p>Footway to be provided along frontage of development site on West Glen Rod to provide pedestrian links towards the village.</p> <p>Requires lighting to be extended northward beyond the access point.</p> <p>Parking should be provided in accordance with approved parking standard.</p> <p>Development should include measures to reduce vehicle speeds within the site.</p> <p>Street lighting to be provided throughout site. Self-certified flood risk assessment required in accordance with policy.</p>

Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	<p>Scottish Water confirm that there is sufficient water and waste water treatment capacity to service proposed demand. Further investigations may be required to determine impacts on network capacities.</p> <p>No comments received from other utility providers.</p>
Does the proposal raise any educational capacity issues?	None identified

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	None identified
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Kilmacolm as a strong market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	The scale of development on a site of this size could be delivered by 2024, although it is noted there is no specific developer attached to the site.

Key Agency Comments

HES	No comment
NatureScot	This site acts as a gateway to Kilmacolm from the north-east, however, it is physically, visually and perceptually detached from the settlement of Kilmacolm. Development here could set an unfortunate precedent for future development to the north, eroding the rural character. Should the site be allocated in the Plan, the semi-natural woodland should be retained. This should be incorporated into an enhanced landscape framework for the site. Consideration should also be given to active travel links to encourage more sustainable modes to be used.
Scottish Forestry	Trees found occasionally throughout site.
SEPA	No comment
Scottish Water	<p>There is sufficient water and waste water treatment works capacity to service proposed demand.</p> <p>Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any this development has on the existing water treatment network.</p> <p>As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>There is a near-by watercourse which should support a surface water solution- please see Scottish Water's Surface Water Policy.</p>
Sportscotland	No comment

SPT	Public transport accessibility information provided under Climatic factors topic in the SEA summary.
Transport Scotland	No comment

Other comments received to MIR consultation

In addition to any representations received from the site promoter or key agencies (see above):

- One representation objected to the proposal on the basis that the site should remain greenbelt

Summary and conclusion

The Misty Law site is not known to have any significant technical constraints which would impact deliverability. Potential water and waste water network issues can be addressed at the planning application stage.

No environmental designations cover the site and development unlikely to have any significant effects on wider natural heritage, subject to the mature trees along site boundaries being retained. Development would extend the built-up area northwards along West Glen Road and, although it would be contained by a conifer tree belt, this would not be a particularly robust boundary and could result in pressure for further northern expansion.

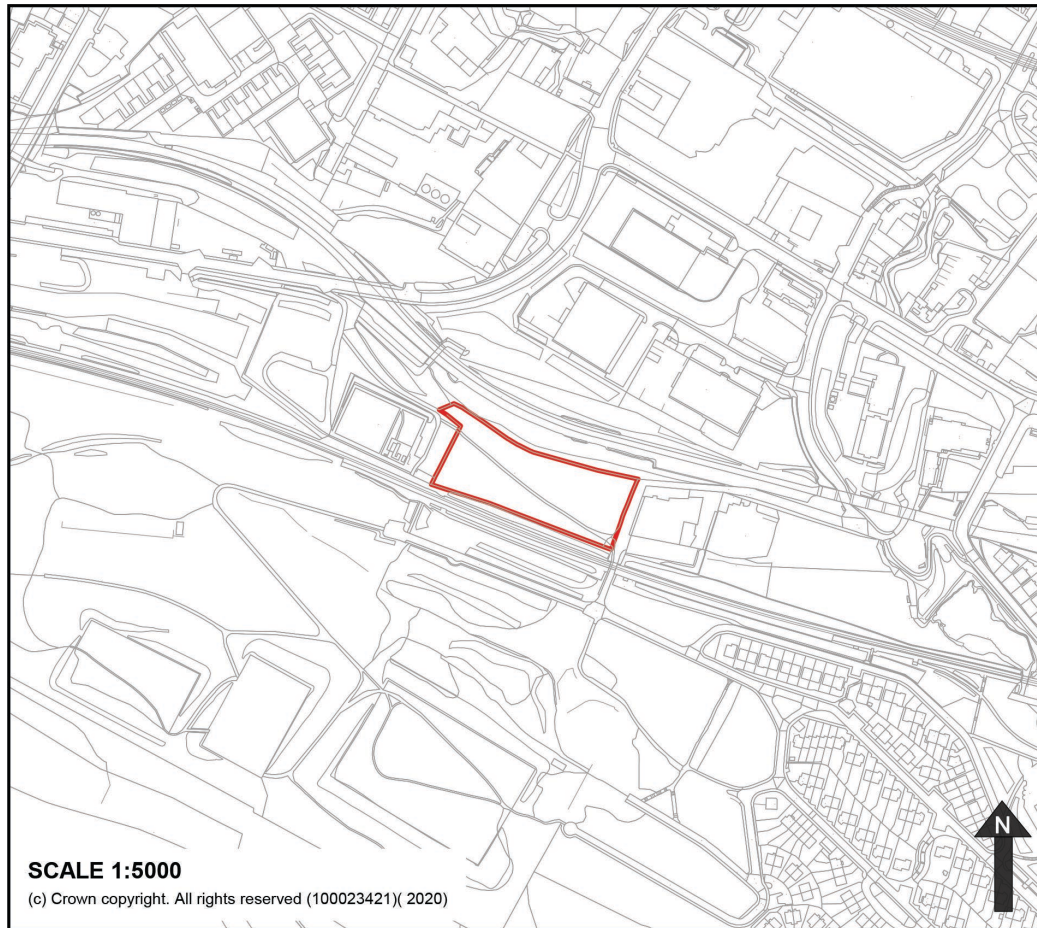
The site is not within an accessible distance of a public transport service, but is accessible to local services in Kilmacolm.

The site is in a marketable area. While a developer is not attached to the proposal, it is likely that it would attract developer interest. It is considered that site is of a size that could be developed in the period to 2024.

With regard to the above and the findings of the Housing Land Technical Report 2021, it is not considered appropriate or necessary to allocate this site for housing development in the Proposed Local Development Plan.

Site Details

Site name	Upper Cartsburn
Settlement	Greenock
Call for Sites reference	MIR1
Site size (ha)	0.8
Current use	Open Space
Existing LDP designation	Open Space



Proposal

Submitted by	Named individual
Proposed Use	Business and Industrial and open space
Number of houses/floorspace	n/a
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p>While the site is currently designated as open space, it offers no quality space or public value and serves only the occasional person walking through as a shortcut to get from one point to another. It also offers no opportunities for sport and recreation and can barely be considered a visual amenity as it is subject to frequent fly tipping. Redevelopment of the site would create a more attractive and upmarket profile in the area and help improve security concerns in the area.</p> <p>Alongside development of commercial building(s), the proposal would retain the Right of Way through the site and include measures to utilise much of the current flora on the site as well as planting more trees and landscaping in an attempt to keep the site greener and more in keeping with environmental needs for the future</p> <p><u>Supporting Documents</u></p> <ul style="list-style-type: none"> • MIR representation <p><u>Comments relating to specific issues raised in the Initial Site Assessment.</u></p> <p>None identified</p>

Planning History

Planning Applications	No recent applications
Previous Plan – Reporters Comments	n/a

Green Belt boundary issues

Robustness of existing boundary	n/a
Robustness of proposed boundary	n/a

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Small area of medium surface water flood risk within eastern part of site. Known hydraulic constraints within the waste water network.
Biodiversity	11	No environmental designations within site. Some trees found occasionally throughout site, along with rough/semi-natural grassland which may have some biodiversity value.
Climatic Factors	7, 5	Car travel and associated emissions will be minimised as site is within 400m of bus stop with at least 1 bus per hour, every hour, between 7am and 7pm on weekdays. Also within 800m of a rail station.
Air	13	Short term impacts during the construction phase, but unlikely to lead to the designation of an AQMA
Soil	13,4	Brownfield redevelopment.
Landscape	11	Site is relatively self-contained in landscape terms
Material Assets	4	Brownfield redevelopment
Cultural Heritage	10	No cultural heritage assets in close proximity of the site.
Population and Health	5, 8, 13	Site is identified and safeguarded as open space in the LDP, but not considered to be of high quality in its current condition. It is noted that the proposal would seek to incorporate improvements to the open space and retain the existing Right of Way through the site, in conjunction with the built development. Site is 580m from active travel network. Not accessible to local services – 830m.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	<p>Main access from Upper Cartsburn Street as close to the bend in the road as possible to provide suitable visibility.</p> <p>Provide pedestrian links within the site.</p> <p>Provide pedestrian/ cycle links towards Core Path Network.</p> <p>Footway to be provided along frontage of development site on Upper Cartsburn Street to provide pedestrian links towards Whinhill Road.</p> <p>Parking should be provided in accordance with approved parking standard.</p> <p>Street lighting to be provided throughout site.</p>
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	<p>Scottish Water confirm that there is sufficient water capacity to service proposed demand, but limited waste water treatment capacity. Further investigations may be required to determine impacts on network capacities.</p> <p>No comments received from other utility providers.</p>
Does the proposal raise any educational capacity issues?	n/a

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	n/a
Is there evidence of housing demand/need in the area proposed?	n/a
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	n/a

Key Agency Comments

HES	No comment
NatureScot	This site is largely included in the semi-natural woodland inventory, however, we understand that much of the site is now developed. There are a few trees on the site and there appears to be rough/semi-natural grassland which may have some biodiversity value and should be taken into consideration in any development proposals. There is also a path running through the site which may have some recreational value and should be incorporated into the design of any development proposal.
Scottish Forestry	Trees found occasionally throughout site.

SEPA	No comment
Scottish Water	<p>There is sufficient water treatment works capacity. Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any this development has on the existing water treatment network.</p> <p>Inverclyde PFI Treatment works has limited capacity for domestic sites and if any developers are proposing trade-effluent here they would need to work very closely with Scottish Water on this. Please advise developers to submit pre-development enquiries as early as possible to start initial site assessments including flow rate assessments and discussions of trade effluent qualities and quantities. As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>There is a near-by watercourse which should support a surface water solution- please see Scottish Water's Surface Water Policy and advice.</p> <p>There is a 22 inch water distribution trunk mains pipe within the boundary of the site towards the west of the site. When working with existing assets please consider required stand-off distances and access requirements. Please see Scottish Water Asset Policy Standard Water Mains Protection Distance policy document.</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under 'Climatic factors' topic in the sustainability assessment.
Transport Scotland	No comment

Other comments received to MIR consultation

Proposal submitted during MIR consultation and therefore not yet subject to consultation.

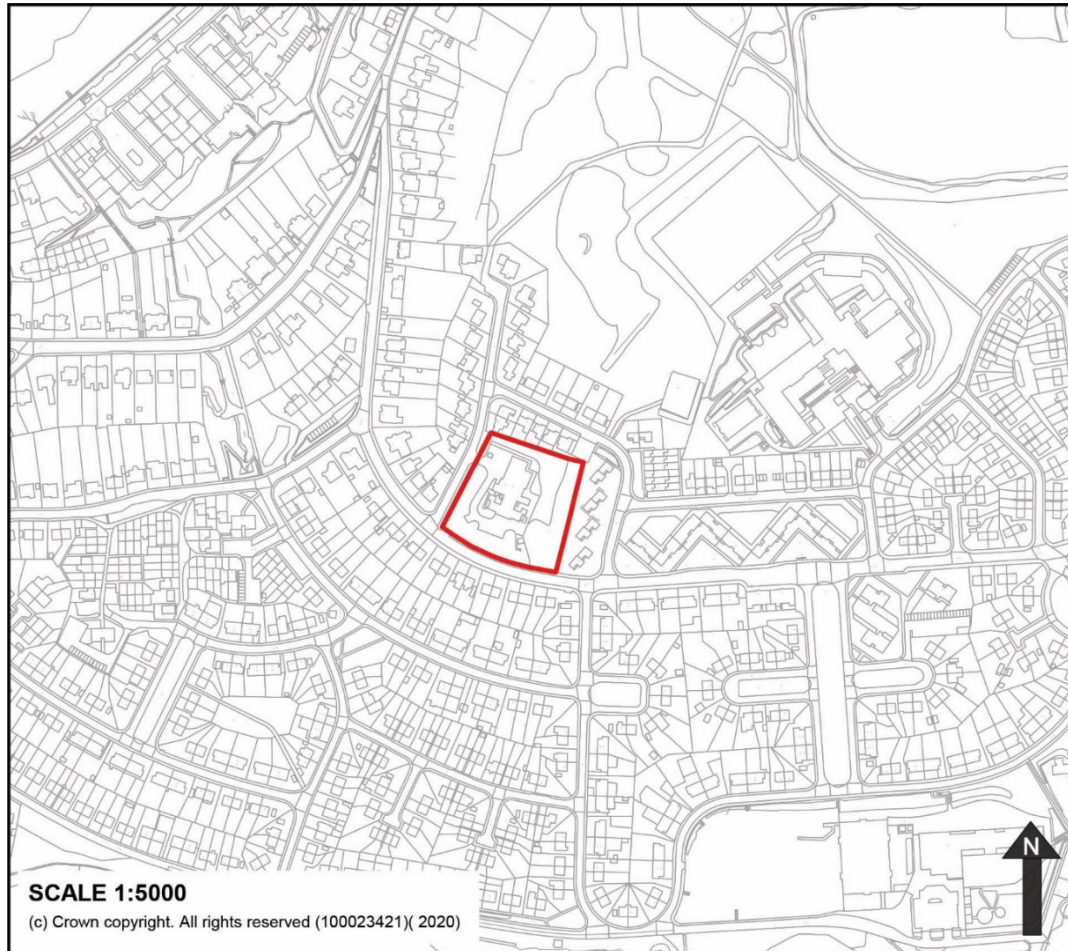
Summary and conclusion

<p>The Upper Cartsburn site is not known to have any significant technical constraints which would impact deliverability. Potential flood risk and water and waste water network issues can be addressed at the planning application stage.</p> <p>While there are no environmental designations affecting the site, the value of existing trees and rough grassland needs to be assessed. While the open space is not of a high quality, there may be scope for improvements in the future. The site is within an accessible distance of a regular public transport service, but not accessible to local services in Greenock.</p>

The proposal has not demonstrated that there is market demand for additional business and industrial land in this location. In light of this and the significant supply of existing business and industrial land in Greenock, it is considered that there is no currently no clear need to re-designate the site from open space to business and industrial use. The site is therefore not included as development opportunity in the Proposed Plan.

Site Details

Site name	McPherson Drive
Settlement	Gourock
Call for Sites reference	OS1
Site size (ha)	0.72
Current use	Vacant buildings
Existing LDP designation	Residential Area



Proposal

Submitted by	Internal
Proposed Use	Residential
Number of houses/floorspace	22 houses
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	<p><u>General</u></p> <p>This proposed site, which was previously occupied by the McPherson Centre, is currently the subject of a planning application (ref: 20/0099/IC) for 22 two storey houses.</p> <p><u>Supporting Documents (submitted with planning application 20/0099/IC)</u></p> <ul style="list-style-type: none">• Flood Risk Assessment• Environmental Assessment• Proposed Site Plan <p><u>Comments relating to specific issues raised in the Initial Site Assessment</u></p> <p>None identified</p>

Planning History

Planning Applications	20/0099/IC - Planning application for 22 houses. Pending.
Previous Plan – Reporters Comments	n/a

Green Belt boundary issues

Robustness of existing boundary	n/a
Robustness of proposed boundary	n/a

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Surface water flood risk identified, but submitted Flood Risk Assessment concludes that this risk can be mitigated. Known hydraulic constraints within the waste water network.
Biodiversity	11	No environmental designations within or in close proximity to site. Development would have adverse impacts as the proposed site plan indicates a significant number of mature trees within the eastern, southern and western boundaries would be removed.
Climatic Factors	7, 5	Car travel and associated emissions will be minimised as site is within 400m of bus stop with at least 1 bus per hour, every hour, between 7am and 7pm on weekdays.
Air	13	Short term impact during construction phase, but unlikely to lead to designation of an AQMA
Soil	13,4	Re- development of brownfield site
Landscape	11	Redevelopment of existing site/buildings unlikely to have any significant effects.
Material Assets	4	Re-development brownfield land.
Cultural Heritage	10	No known impact on cultural heritage assets identified
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, which includes open space. No impact on active travel network, which is 554m from site. Site not accessible to local services – 1054m.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	Access to the site from Tower Drive and/or McPherson Drive. Provide pedestrian links within the site and to surrounding network.

	<p>Suitable visibility should be provided at all accesses and driveways.</p> <p>Parking should be provided in accordance with approved parking standard.</p> <p>Development should include measures to reduce vehicle speeds within the site to 20mph.</p> <p>Street lighting to be provided throughout site.</p>
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	<p>Scottish Water confirm that there is sufficient water capacity to service proposed demand, but limited waste water treatment capacity. Further investigations may be required to determine impacts on network capacities.</p> <p>No comments received from other utility providers.</p>
Does the proposal raise any educational capacity issues?	None identified

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	Yes - Titan Homes
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Inverclyde West as a moderate market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	Yes, it is considered that the site could deliver houses by 2024.

Key Agency Comments

HES	No comment
NatureScot	We note that this is a brownfield site with semi-natural woodland within the boundaries. This woodland should be retained and incorporated into landscape framework.
Scottish Forestry	Trees found in the grounds surrounding the main building.
SEPA	No comment
Scottish Water	<p>There is sufficient water treatment works capacity. Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any this development has on the existing water treatment network.</p> <p>Inverclyde PFI Treatment works has limited capacity for domestic sites and if any developers are proposing trade-effluent here they would need to work very closely with Scottish Water on this. Please advise developers to submit pre-development enquiries as early as possible to start initial site assessments including flow rate assessments and discussions of trade effluent qualities and quantities. As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p>

Sportscotland	No comment
Strathclyde Partnership for Transport	Public transport accessibility information provided under 'Climatic factors' topic in the sustainability assessment.
Transport Scotland	No comment

Other comments received to MIR consultation

No further comments received

Summary and conclusion

The McPherson Drive site is not known to have any significant technical constraints which would impact deliverability. Potential flood risk and water and waste water network issues can be addressed at the planning application stage.

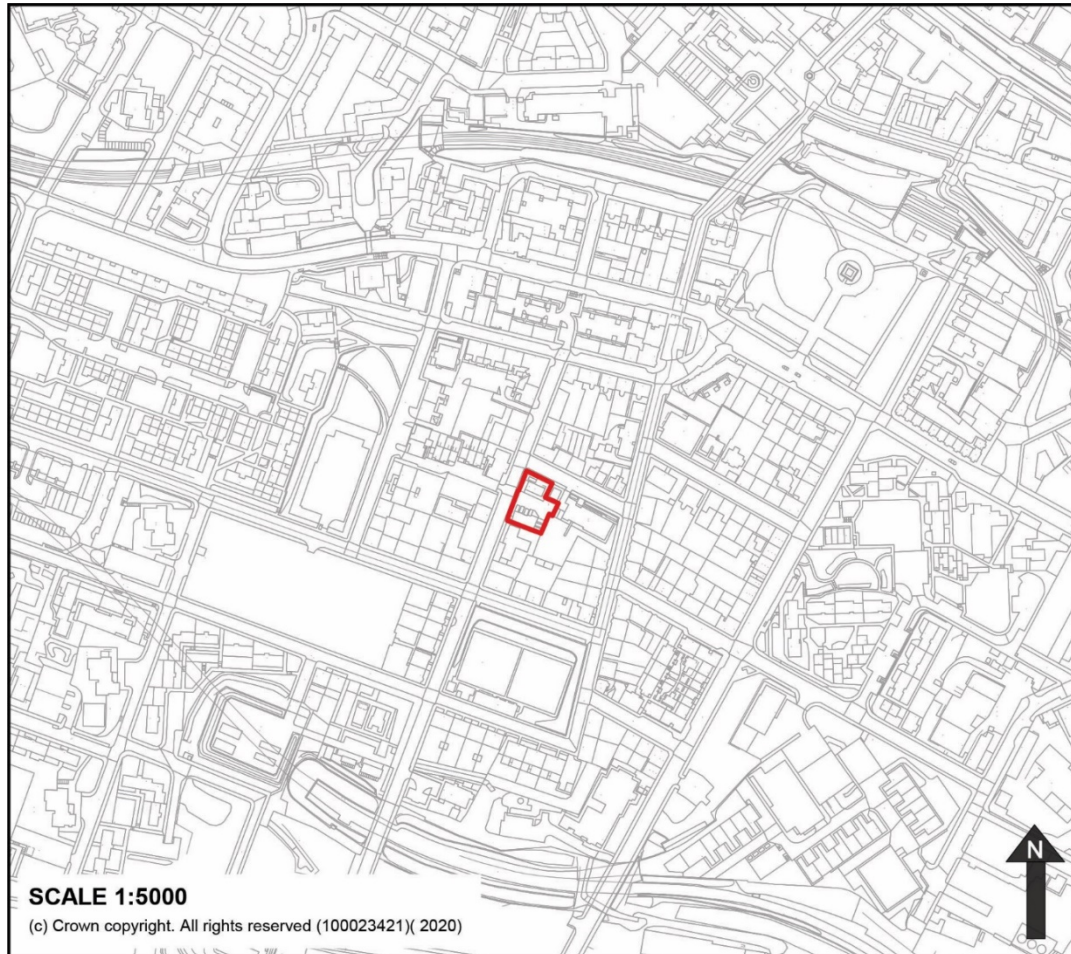
While there are no environmental designations covering the site, the proposed removal of mature tree cover along site boundaries would have an adverse effect on wider natural heritage. Site is accessible to a regular public transport service, but not accessible to local services.

An active housebuilder has submitted a planning application for the site and it is considered that housing could be delivered in the short-term.

With regard to the above and the findings of the Housing Land Technical Report 2021, it is considered that this site is an appropriate addition to the housing land supply in the Proposed Local Development Plan.

Site Details

Site name	Mearns Street
Settlement	Greenock
Call for Sites reference	OS4
Site size (ha)	0.1
Current use	Scout Hut
Existing LDP designation	Residential area



Proposal

Submitted by	Internal submission
Proposed Use	Residential
Number of houses/floorspace	TBC
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	None provided.

Planning History

Planning Applications	No recent applications
Previous Plan – Reporters Comments	n/a

Green Belt boundary issues

Robustness of existing boundary	n/a
Robustness of proposed boundary	n/a

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Known hydraulic constraints within the waste water network.
Biodiversity	11	No environmental designations within or in close proximity to site.
Climatic Factors	7, 5	Car travel and associated emissions will be minimised as site is within 400m of bus stop with at least 1 bus per hour, every hour, between 7am and 7pm on weekdays. Also within 800m of a rail station.
Air	13	Short term impact during construction phase, but unlikely to lead to designation of an AQMA
Soil	13,4	Redevelopment of brownfield land

Landscape	11	Redevelopment of brownfield site in urban area. Design would need to take account of steep slope.
Material Assets	4	Re-use of brownfield site.
Cultural Heritage	10	In close proximity to a B Listed building on Bank Street
Population and Health	5, 8, 13	Development would be required to contribute to green infrastructure provision, which includes open space. No impact on active travel network, which is 280m from nearest core path. Site accessible to local services – within 370m.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	Access to the site Mearns Street to be a sufficient distance from Armadale Place. Provide pedestrian links within the site and to surrounding network. Suitable visibility should be provided at all accesses and driveways. Parking should be provided in accordance with approved parking standard. Development should include measures to reduce vehicle speeds within the site to 20mph. Street lighting to be provided throughout site.
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	Scottish Water confirm that there is sufficient water capacity to service proposed demand, but limited waste water treatment capacity. Further investigations may be required to determine impacts on network capacities. No comment received from other utility providers.
Does the proposal raise any educational capacity issues?	None identified

Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	No
Is there evidence of housing demand/need in the area proposed?	Homes for Scotland has identified Inverclyde East as a poor market area (2016).
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	The site could deliver housing in the period to 2032.

Key Agency Comments

HES	No comment
NatureScot	This appears to be steeply sloping brownfield site and development proposals should ensure that sustainable design is delivered which is coherent with existing development
Scottish Forestry	Trees found occasionally throughout site.
SEPA	No comment
Scottish Water	There is sufficient water treatment works capacity to service proposed demand. Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any this development has on the existing water treatment network. Inverclyde PFI Treatment works has limited capacity for domestic sites and if any developers are proposing trade-effluent here they would need to work very closely with Scottish Water on this. Please advise developers to submit pre-development enquiries as early as possible to start initial site assessments including flow rate assessments and discussions of trade effluent qualities and quantities. As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.
Sportscotland	No comment
SPT	Public transport accessibility information provided under Climatic factors topic in the SEA summary.
Transport Scotland	No comment

Other comments received to MIR consultation

No further comments received

Summary and conclusion

The Mearns Street site is not known to have any significant technical constraints which would impact deliverability. Potential water and waste water network issues can be addressed at the planning application stage.

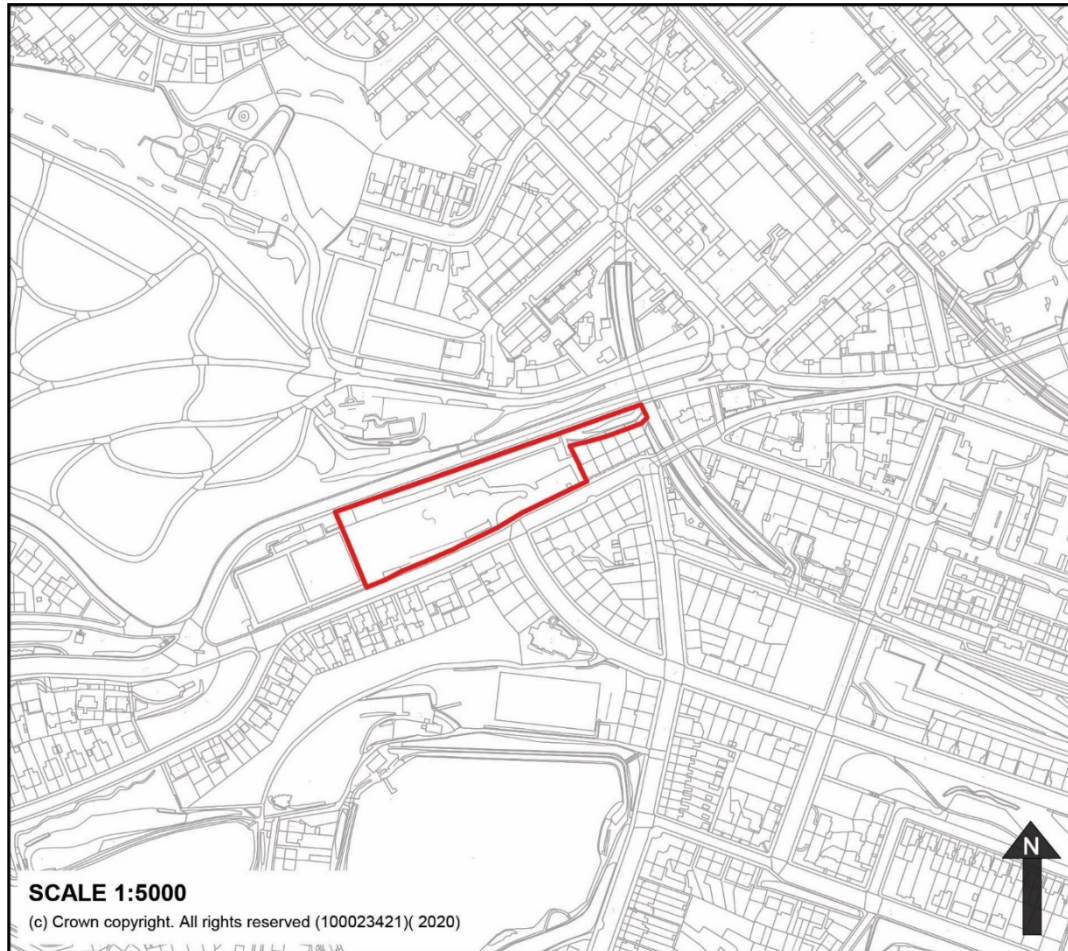
No environmental designations cover the site and development is unlikely to have any effects on wider natural heritage. Design to take account of and avoid adverse effects on nearby B listed building. Site accessible to a regular public transport service and local services in Greenock town centre.

The site is in an area considered by Homes for Scotland to have a poor market and a developer is not attached to the proposal

With regard to the above and the findings of the Housing Land Technical Report 2021, it is considered that this site is an appropriate addition to the housing land supply in the Proposed Local Development Plan.

Site Details

Site name	Brachelston Street
Settlement	Greenock
Call for Sites reference	OS5
Site size (ha)	1.04
Current use	Vacant land
Existing LDP designation	Open space



Proposal

Submitted by	Internal submission
Proposed Use	Community Facility
Number of houses/floorspace	n/k
Summary of supporting information provided by the site promoter in their CFS submission and/or MIR response	None provided

Planning History

Planning Applications	No recent applications
Previous Plan - Reporters Comments	n/a

Green Belt boundary issues

Robustness of existing boundary	n/a
Robustness of proposed boundary	n/a

Sustainability Assessment

SEA Topic	SPP Sustainability Principle	Summary comments
Water	13	Area of medium/high surface water flood risk within site. Known hydraulic constraints within the waste water network
Biodiversity	11	No environmental designations within or in close proximity to site. The biodiversity value of the site has been increased significantly in recent years through the Inverclyde Pollinator project Development of the whole site would likely have adverse effects on biodiversity within the urban area.
Climatic Factors	7, 5	Car travel and associated emissions will be minimized as site within 400m of bus stop with at least 6 buses per hour between 7am and 7pm on weekdays and 800m of a rail station.

Air	13	Short term impact during construction phase, but unlikely to lead to designation of an AQMA
Soil	13,4	Redevelopment of brownfield site
Landscape	11	Redevelopment of the whole site is likely to have both positive and negative effects as part of site is derelict, while other parts benefit from landscape features implemented through the Inverclyde Pollinator project.
Material Assets	4	Redevelopment of brownfield site
Cultural Heritage	10	Not in close proximity to any cultural heritage assets.
Population and Health	5, 8, 13	Development would result in the loss of open safeguarded in the LDP. While the space is partly in use by a local community nature project, its value as open space is limited by the generally derelict nature of the site and the fact that it is not accessible to the public. Site is 200m from the active travel network and accessible to local services – 194mm.

SPP Sustainability Principle	Criteria	Summary comments
1	Will the proposal likely result in a net economic benefit?	Yes
3	Is the proposed site located within or adjacent to an existing settlement with opportunity for integration?	Yes
4	Will the proposal support any Town Centre or Priority Place regeneration priorities?	No

Deliverability Assessment

Infrastructure

Criteria	Summary comments
Would the proposed site require additional transport infrastructure provision?	Access to the site Brachelston Street. No access from Inverkip Road. Provide pedestrian links within the site and to surrounding network. Suitable visibility should be provided at access. Parking should be provided in accordance with approved parking standard. Development should include measures to reduce vehicle speeds within the site to 20mph. Street lighting to be provided throughout site.
Would the proposal require additional utilities infrastructure (e.g. water and sewerage, gas, electricity, telecommunications)	Scottish Water confirm that there is sufficient water capacity to service proposed demand, but limited waste water treatment capacity. Further investigations may be required to determine impacts on network capacities. No comment received from other utility providers.

Does the proposal raise any educational capacity issues?	n/a
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Marketability

Criteria	Summary comments
Does a proven housebuilder have an interest in the site?	n/a
Is there evidence of housing demand/need in the area proposed?	n/a
If allocated for development, is it considered likely that development would be delivered on the site during the Plan period i.e. by 2024 or 2032?	n/a

Key Agency Comments

HES	No comment
NatureScot	This appears to be a brownfield site which has been recolonised by vegetation and is therefore likely to have some biodiversity value. It would be useful for development proposals to recognise this and support any applications with proposals to conserve and enhance any biodiversity value on the site. There is also a Core Path to the east of site which presents an opportunity to link into the wider walking and cycling network.
Scottish Forestry	Edging trees bordering this site.
SEPA	No comment
Scottish Water	<p>There is sufficient water treatment works capacity to service proposed demand. Further investigation such as Flow and Pressure tests or Water Impact Assessments may be required to establish what impact, if any this development has on the existing water treatment network.</p> <p>Inverclyde PFI Treatment works has limited capacity for domestic sites and if any developers are proposing trade-effluent here they would need to work very closely with Scottish Water on this. Please advise developers to submit pre-development enquiries as early as possible to start initial site assessments including flow rate assessments and discussions of trade effluent qualities and quantities. As there are known hydraulic constraints within the waste water network, and known local flooding hot spots, it is likely that the developer will be requested to carry out further investigations such as Drainage Impact Assessments.</p> <p>There is a natural water pipe within the boundary of the site towards the north of the site. When working with existing assets please consider required stand-off distances and access requirements. Please see Scottish Water Asset Policy Standard Water Mains Protection Distance policy document.</p>
Sportscotland	No comment
SPT	Public transport accessibility information provided under 'Climatic factors' topic in the sustainability assessment.

Transport Scotland	No significant impact on the trunk road.
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Other comments received to MIR consultation

No further comments received

Summary and conclusion

<p>The Brachelston site is not known to have any significant technical constraints which would impact deliverability. Potential flood risk and water and waste water network issues can be addressed at the planning application stage.</p> <p>While no environmental designations cover the site, development is likely to have some adverse effects on wider natural heritage as a recent community project has increased its ecological value. Design would need to take account of and avoid adverse effects on nearby B listed building. Site accessible to a regular public transport service and local services in Greenock town centre. While open space would be lost through development, the site is generally derelict and not accessible to the public.</p> <p>The Council has identified a need for a new community facility and would develop the site.</p> <p>In light of the above, the site is considered a suitable option for a new community facility and is therefore included as a development opportunity in the Proposed Plan.</p>

Inverclyde
council

Regeneration and Planning

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