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## **Introduction**

Thank you for your interest in the Inverclyde Local Development Plan Monitoring Statement. This document is published alongside the Main Issues Report (2017) of the new Inverclyde Local Development Plan with the purposes of:

- illustrating the changes in the principal physical, economic, social and environmental characteristics of the area since the publication of the last Monitoring Statement; and
- assessing the impact of the policies and proposals of the existing plan.

Section 1 of the Monitoring Statement meets this first purpose by setting out graphics and commentary, illustrating and explaining what changes have taken place in the area over recent years.

Section 2 follows the structure of the existing Local Development Plan. With regard to each topic area it explains how the policy context has changed, describes what development has taken place on the ground, and sets out a review of the existing local plan policies. Through this approach, issues for inclusion in the Main Issues Report and the Proposed Plan are identified.

This Monitoring Statement is not a consultation document in its own right, but the Council is happy to accept any comments on the Monitoring Statement as part of the Main Issues Report consultation. Information on how to respond to the Main Issues Report consultation can be found at: [www.inverclyde.gov.uk/newldp](http://www.inverclyde.gov.uk/newldp)

## Changing Inverclyde section

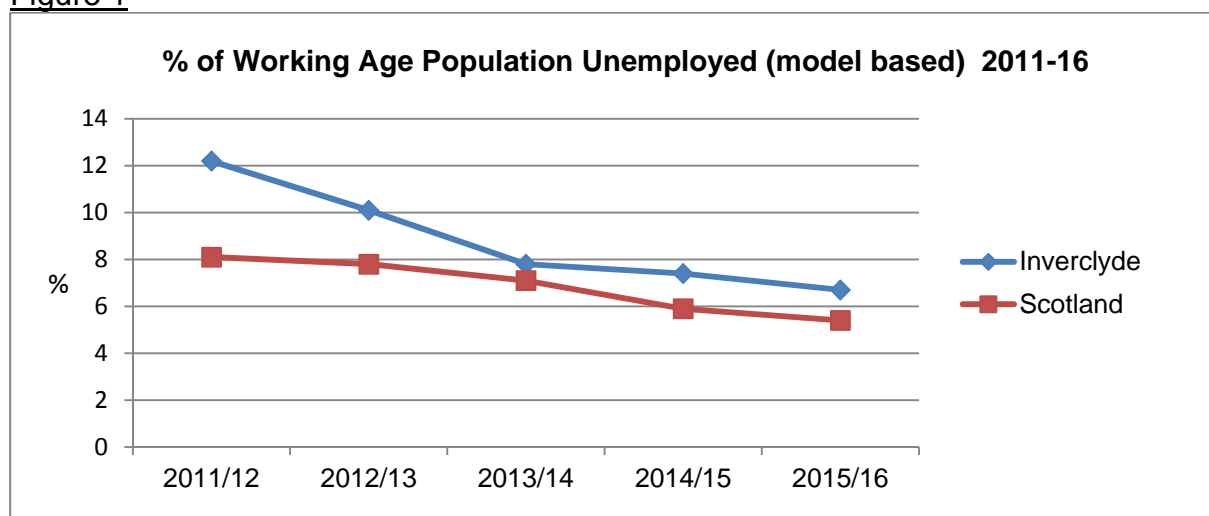
This section of the Monitoring Statement illustrates and explains physical, economic, social and environmental changes in Inverclyde, focussing on the period 2011, when the last Monitoring Statement was published to 2016, which is the most recent year for which information is available.

### Economy and Employment

#### Economic Activity

Inverclyde's economy has seen a return to growth in recent years. Figure 1 shows that the unemployment rate fell by 5.5% between 2011- 2016, compared to a 2.7% fall across Scotland. While the current unemployment rate in Inverclyde (6.7%) remains higher than the Scottish average (5.4%), it is falling at a faster rate.

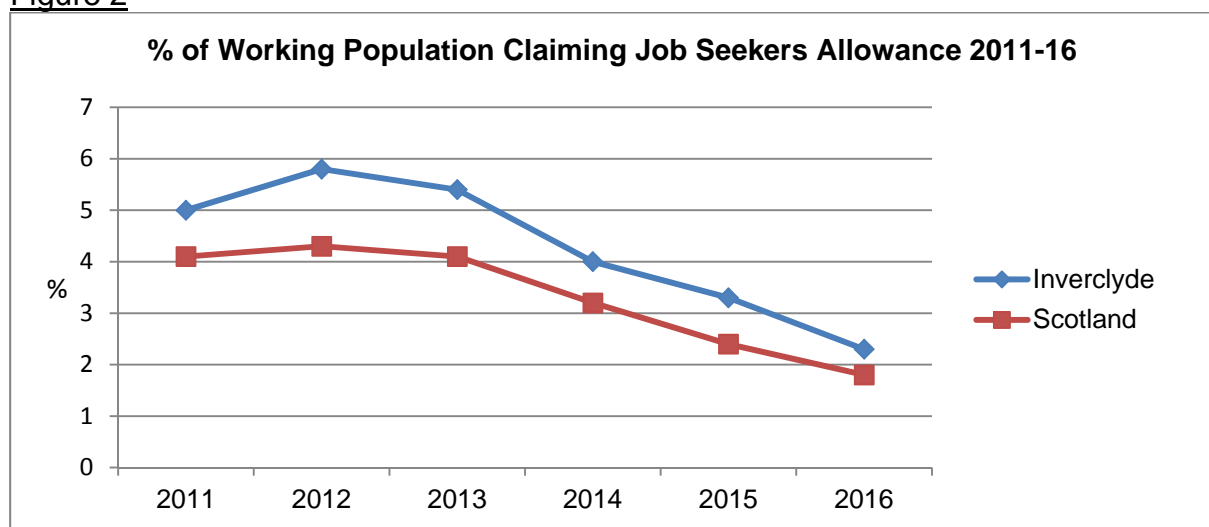
Figure 1



Source: ONS annual population survey  
% is a proportion of economically active

Inverclyde's Job Seekers Allowance claimant rate also fell faster than across Scotland, from 5% in 2011 to 2.3% in 2016 (see Figure 2).

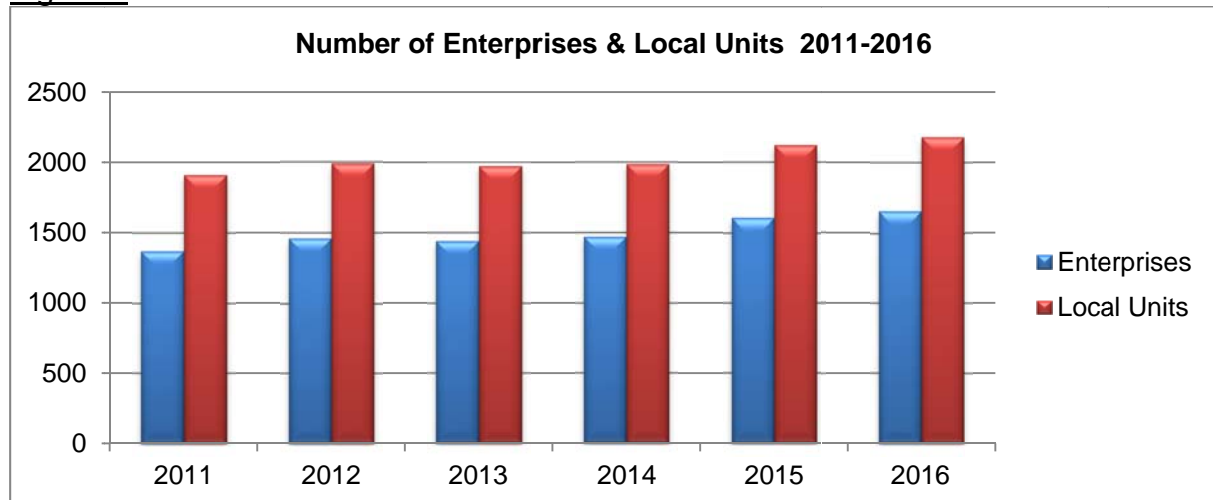
Figure 2



Source: DWP benefit claimants - working age client group

The number of enterprises in Inverclyde has increased by 20.8%, from 1370 in 2011 to 1,655 in 2016, while the number of local units, defined as an individual site within an enterprise, increased by 14.1%, from 1910 in 2011 to 2180 in 2016 (see Figure 3).

**Figure 3**



Source: Inter Departmental Business Register (ONS)

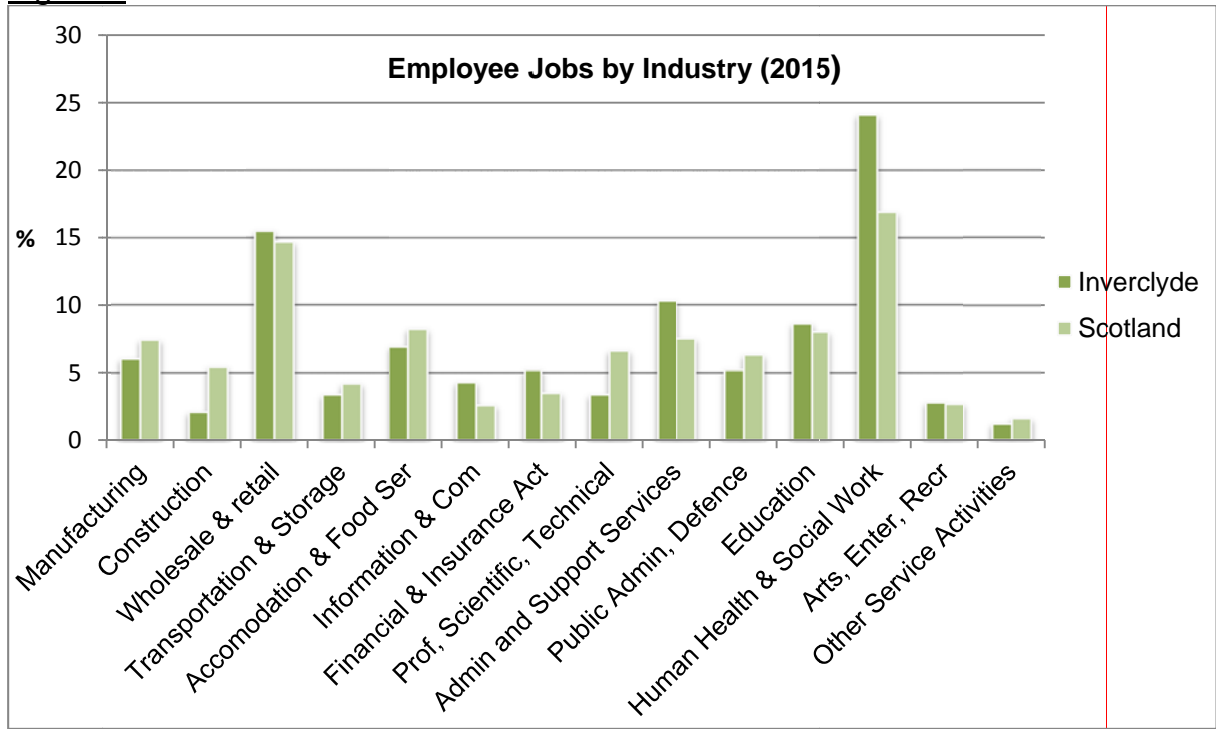
### Economic Characteristics

Inverclyde's economy continues to be underpinned by a high proportion of public sector jobs, which made up 37.9% of total jobs in 2015, compared to 31.2% across Scotland.

Figure 4 shows that Inverclyde also has a higher percentage of jobs in Wholesale and Retail, Information and Communication, Financial and Insurance activities and Administration and Support services, with a lower percentage in all other categories.

Since 2011, significant changes include increases in; Administrative and Support Services (+ 3.4%), Accommodation and Food Services (+ 1.7%), Financial and Insurance Services (+0.9%). There were also decreases in Information and Communication (-1.8%), Professional, Scientific and Technical (-1.8%) and Transportation and Storage (-0.9%).

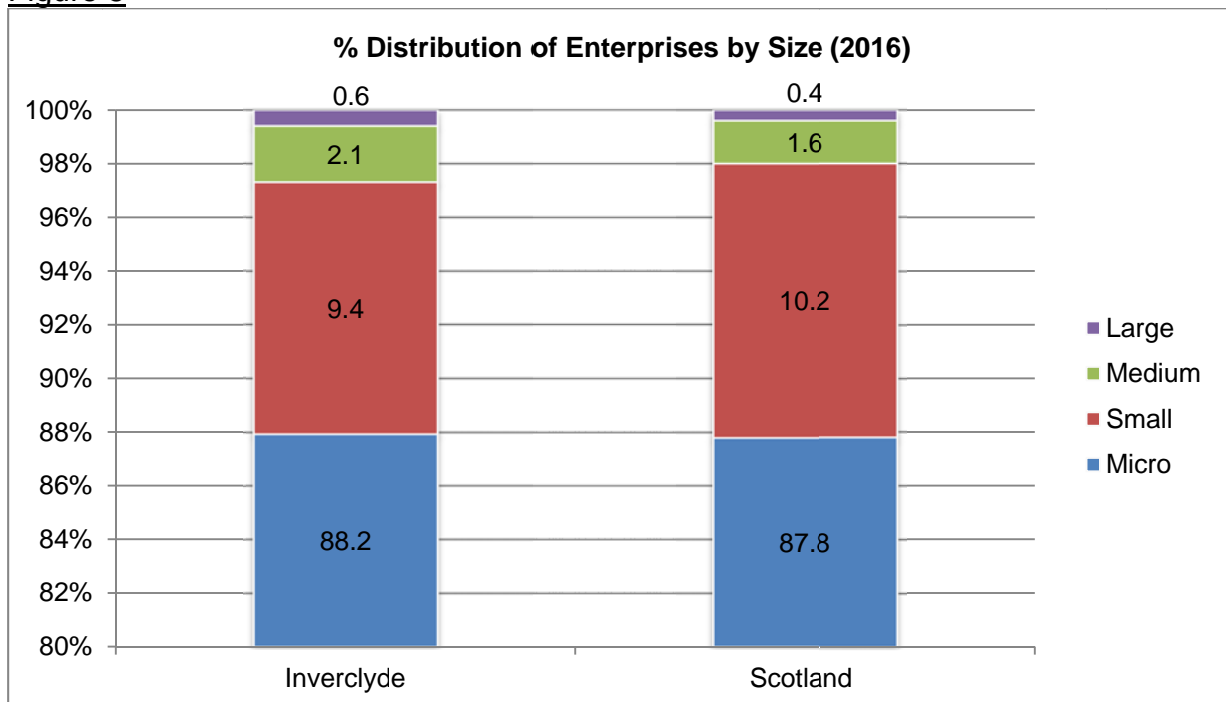
Figure 4



Source: ONS Business Register and Employment Survey

With regard to the make-up of businesses, Figure 5 shows that in 2016 Inverclyde had a higher percentage of micro (0-9 employees), medium (50-249 employees) and large (250+ employees) enterprises than Scotland as a whole, but a lower percentage of small enterprises (10-49 employees). Since 2011, the number of micro enterprises in Inverclyde has fallen by 2.5%, with the number of small enterprises increasing by 1.9%. In addition, the number of medium enterprises rose by 0.2%, with large enterprises increasing by 0.1%.

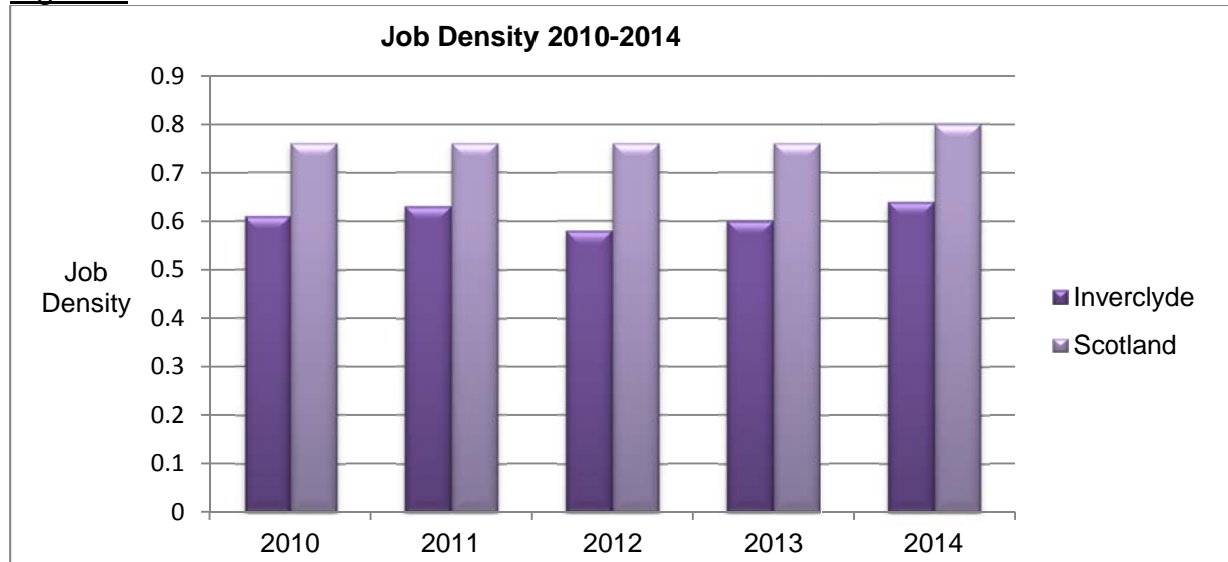
Figure 5



Source: Inter Departmental Business Register (ONS)

Job density refers to the level of jobs per resident aged 16-64, i.e. a job density of 1.0 would mean that there is one job for every resident aged 16-64. Figure 6 shows that Inverclyde, with a job density average of circa 0.6 over the 2010 to 2014 period, is consistently approximately 0.15 below the Scottish average. This is likely to reflect the relatively high level of commuting that takes place from Inverclyde into Renfrewshire and Glasgow.

**Figure 6**

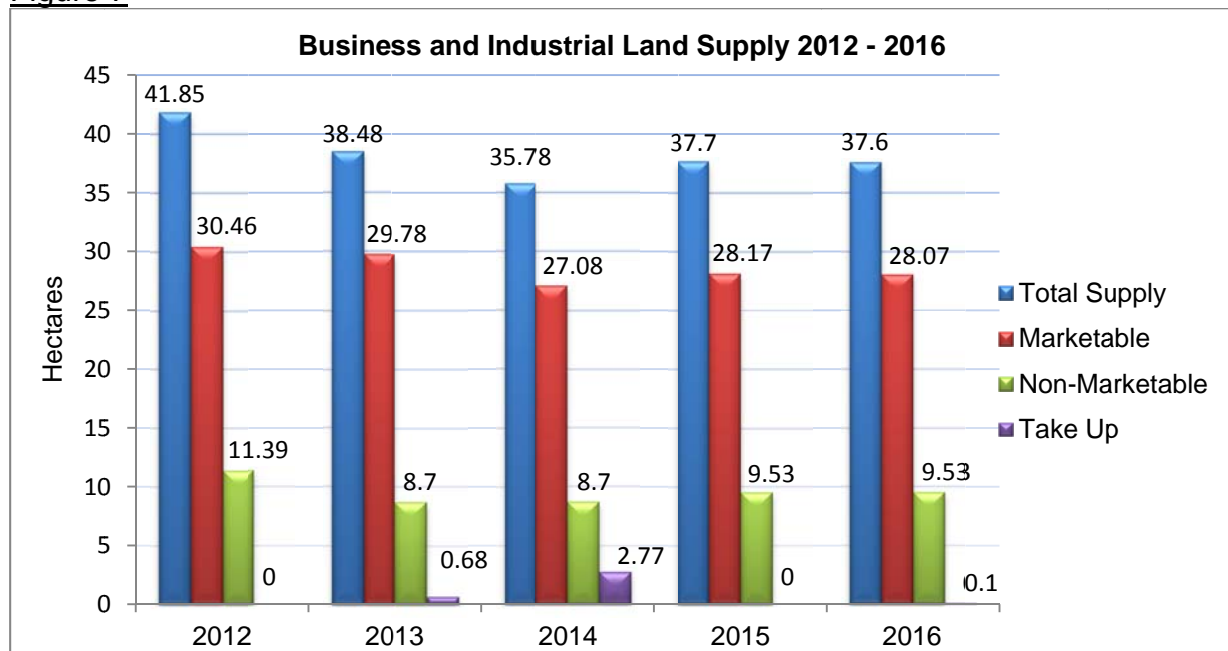


Source: ONS jobs density

**Business and Industrial Land Supply**

Figure 7 shows that Inverclyde continues to have a generous supply of business and industrial development land, with a total of 37.6ha and a marketable supply of 28.07ha. Due to the economic downturn, there has been limited take up of land in the past five years, with a total of 3.55ha over the period.

**Figure 7**



Source: Inverclyde Council

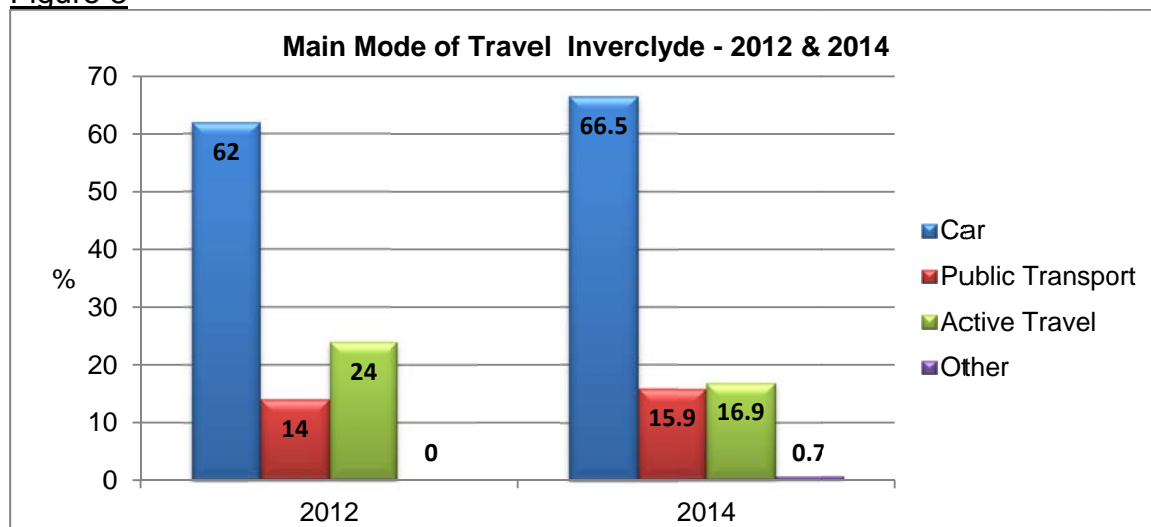
## Transport and Connectivity

Inverclyde is well served in terms of transport, with the A8 and A78 trunk roads running through the area, as well as two train lines with fourteen railway stations, all of which connect Inverclyde with the rest of the Glasgow city-region and beyond. There are four ferry services providing connections to various locations in Argyll and Bute. A number of bus companies also operate across Inverclyde. Inverclyde is connected by a comprehensive core path network, which includes National Cycle Network routes NCN75 and NCN 753, which provide active travel connections to Renfrewshire and Glasgow.

### Main Mode of Travel

The Scottish Household Survey: Local Area Analysis 2014 shows that the car remains the dominant transport mode in Inverclyde, with 65.5%, followed by active travel with 16.9%, public transport with 15.9% and other modes 0.7% (see Figure 8) The number of survey respondents identifying the car as their main mode of travel increased by 4.5% between 2012-2014, with public transport increasing by 1.9% and active travel decreasing by 7.1%.

Figure 8



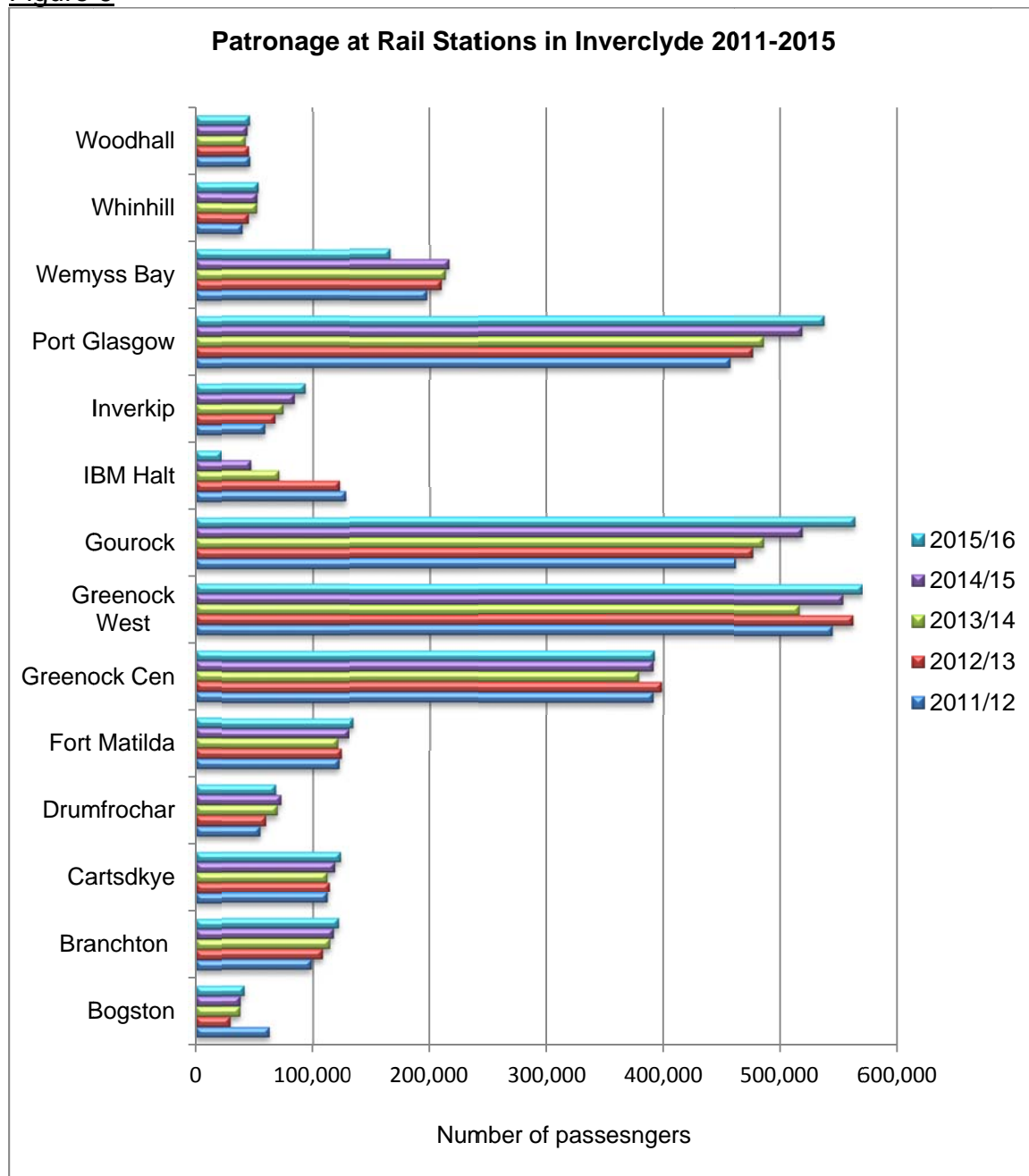
Source: Transport Scotland – Scottish Household Survey Local Area Analysis 2014

### Patronage at rail stations in Inverclyde

With regard to train usage, Figure 9 shows that between 2011-2015 the number of passengers increased at the majority of stations across Inverclyde, apart from Bogston (-33.7%), Woodhall (-0.6%), Wemyss Bay (-16.6%) and the IBM Halt (-82.7%). The significant decrease at the IBM Halt can be explained by the scaling down of operations at the former IBM site at Spango Valley.

In relation to the main settlements, usage rose by 0.2% at Greenock Central, 17.9% at Port Glasgow, 21.7% at Gourock and 57.5% at Inverkip. The significant increase at Gourock is unclear, but may be due to ferry traffic. At Inverkip, the increase is directly related to new residential development immediately to the south of the station and the provision of a pedestrian bridge linking the two.

Figure 9



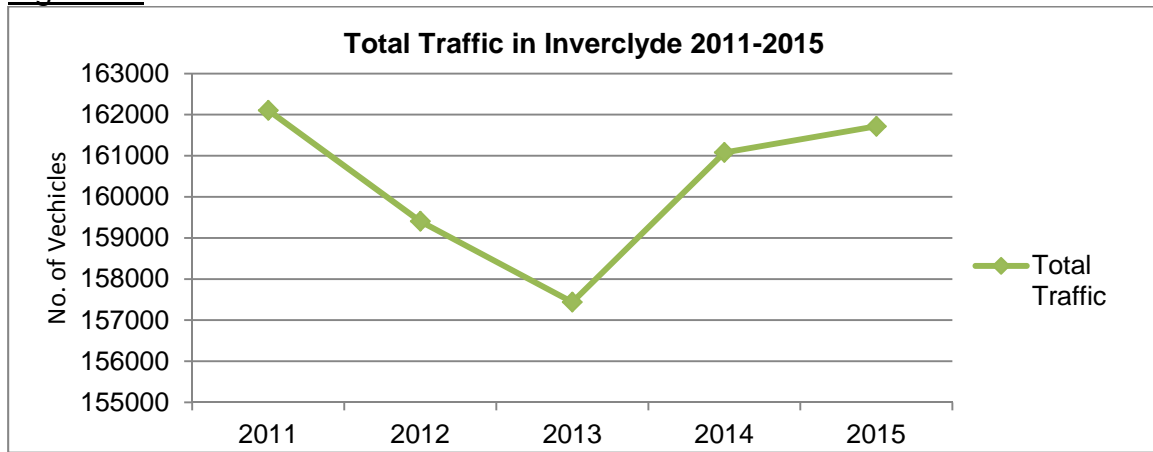
Source: The Scottish Household Survey: Local Area Analysis 2014

Total Traffic on Major Roads

Figure 10 shows that total traffic (all motor vehicles) on major roads in Inverclyde fell from 162,106 in 2011 to 161,717 in 2015, a decrease of 0.23%. However, total traffic increased in both 2014 and 2015 after the lowest level (over 5yrs) was recorded in 2013, at 157,439.



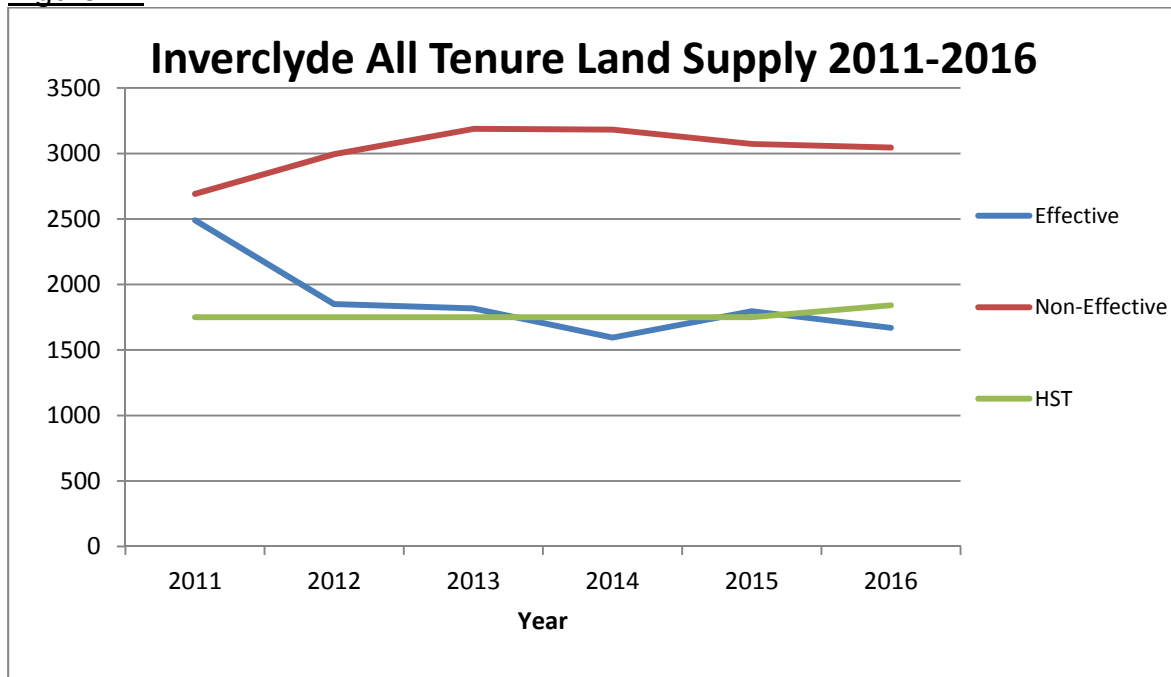
Figure 10



Source: Department for Transport – Traffic Counts

## Housing and Communities

Figure 11

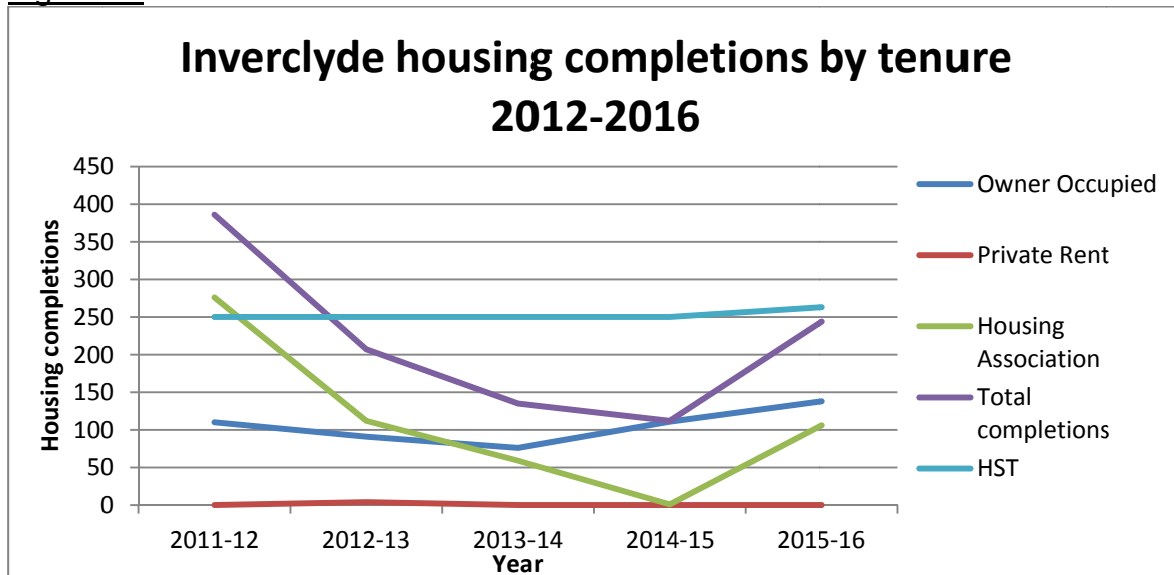


Housing Land Audits published in 2011, 2012, 2013 and 2015 identified a sufficient land supply to meet a 5 year Housing Supply target from those dates. The Housing land Audits published in 2014 and 2016 identified a land supply that was slightly less than required to meet a 5 year Housing Supply Target. The new Plan will seek to address this issue.

The effective land supply in March 2016 was 1,669 units out of a total land supply of 4,714.

The current Local Development Plan (2014) allocated 64 sites for residential development with a total capacity of 4,730 units. Of these, 6 sites are now complete (402 units), with another 6 partially complete or under construction. A further 8 have planning permission.

Figure 12



Despite having an effective land supply for most of the Plan period, completions only met the Housing Supply Target in 2012 and fell well below it until 2016. Owner occupied completions fell sharply following the recession to a low of 76 in 2013/14 but have been increasing since then, showing an improvement in the market that the new Local development Plan aims to build on.

Figure 13

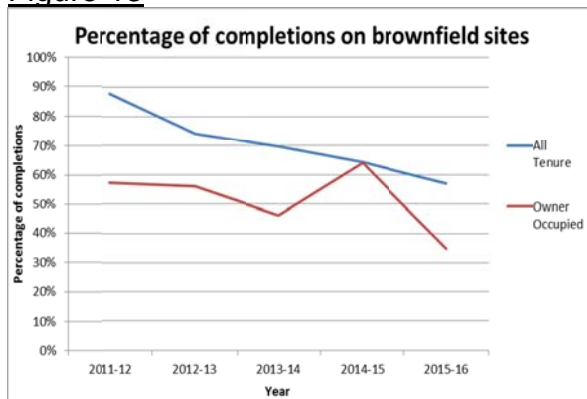
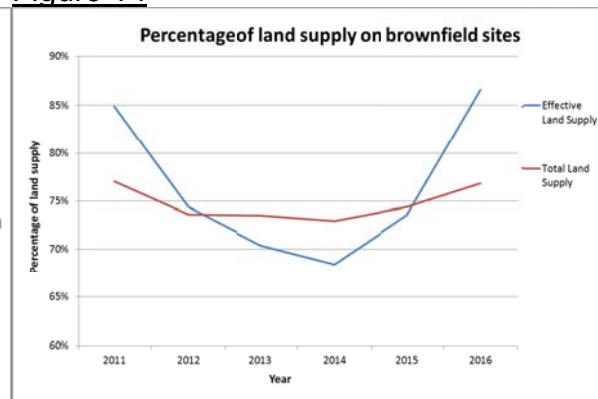


Figure 14



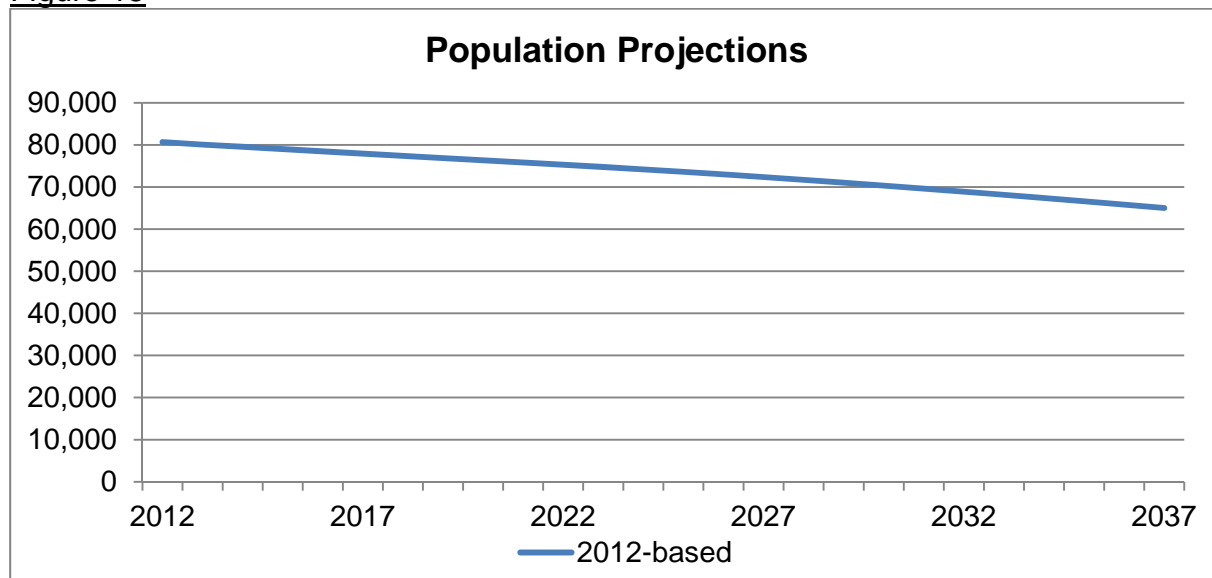
The percentage of completions on brownfield sites has been falling since 2011-12, particularly in the owner-occupied sector, reflecting the difficult conditions for housebuilders following the recession, meaning only the most easily developable sites have gone ahead. Despite this, the majority of completions have been on, and the majority of the land supply is made up of, brownfield sites.

There has been a substantial reduction in social rented stock in the last 15 years due to right-to-buy sales and demolitions. Where demolished stock has been replaced, this has generally taken the form of high density tenements or flats being replaced with lower density semi-detached or terraced housing leading to an overall reduction in stock. As well as the new build programme, River Clyde Homes have also undertaken a large-scale reprovioning programme, upgrading existing stock to meet energy efficiency targets and the Scottish Housing Quality Standard in 2014-15.

## Demographic and social trends

There has been a steady decline in the population of Inverclyde, from 101,182 in 1981 to 79,860 in 2014, a drop of 21,322 people. Population projections indicate that Inverclyde's population will continue to decline over the year period to 2036. The population of Inverclyde is projected to decrease by 13,447 from 78,461 in 2016 to 65,014 in 2036 (627 per year).

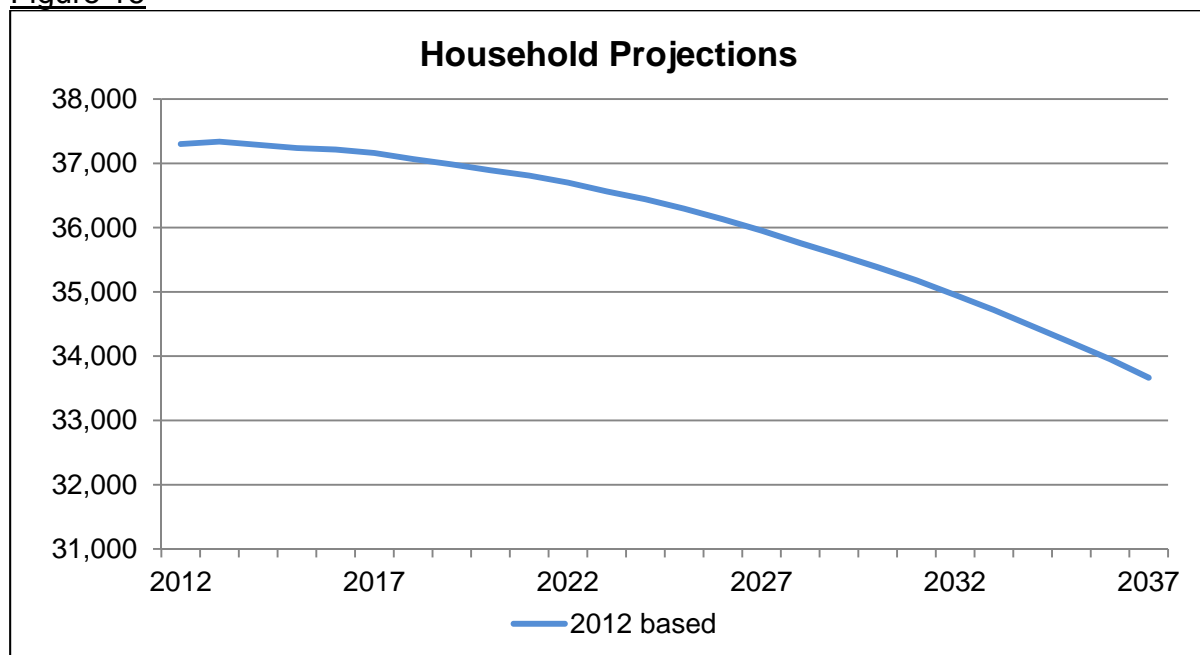
**Figure 15**



Source: National Records for Scotland 2012 Mid-Year Estimates

In previous years the decline in Inverclyde's population was attributed mainly to out-migration from the area. Although out-migration appears to be slowing down, the population of Inverclyde has continued to decline as a result of negative natural change.

**Figure 16**

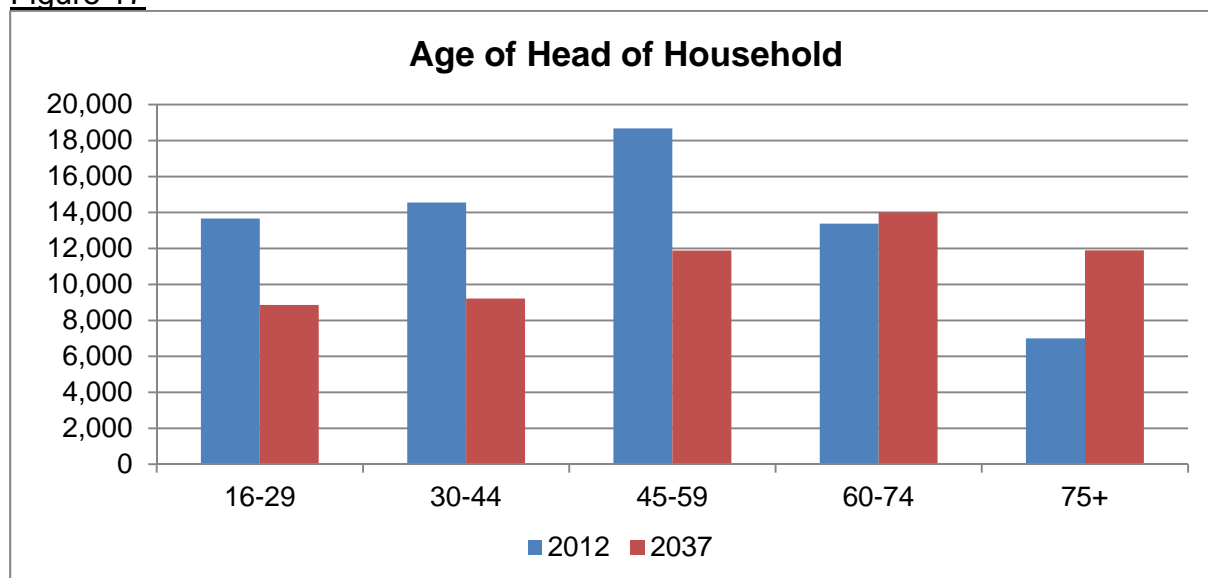


Source: National Records for Scotland 2012 Mid-Year Estimates

Inverclyde had the smallest household growth across Scotland in the last decade. The number of households in Inverclyde is projected to decline at a rate of 145 per year over from 37,299 in 2012 to 33,666 in 2037. Over this time, the average household size will reduce by 12% from 2.13 to 1.89 in 2037.

With the exception of single adult households, which are projected to increase by 11% over the next 25 years, all other types of household will decline over the same period. Households with two or more adults and one or more children will experience the most substantial change. In line with the projections for Scotland as a whole, the most significant increase is for households headed by someone aged 60-74. Those headed by a person 75 and over are forecast to rise by 3,287 (65%) by 2037.

Figure 17

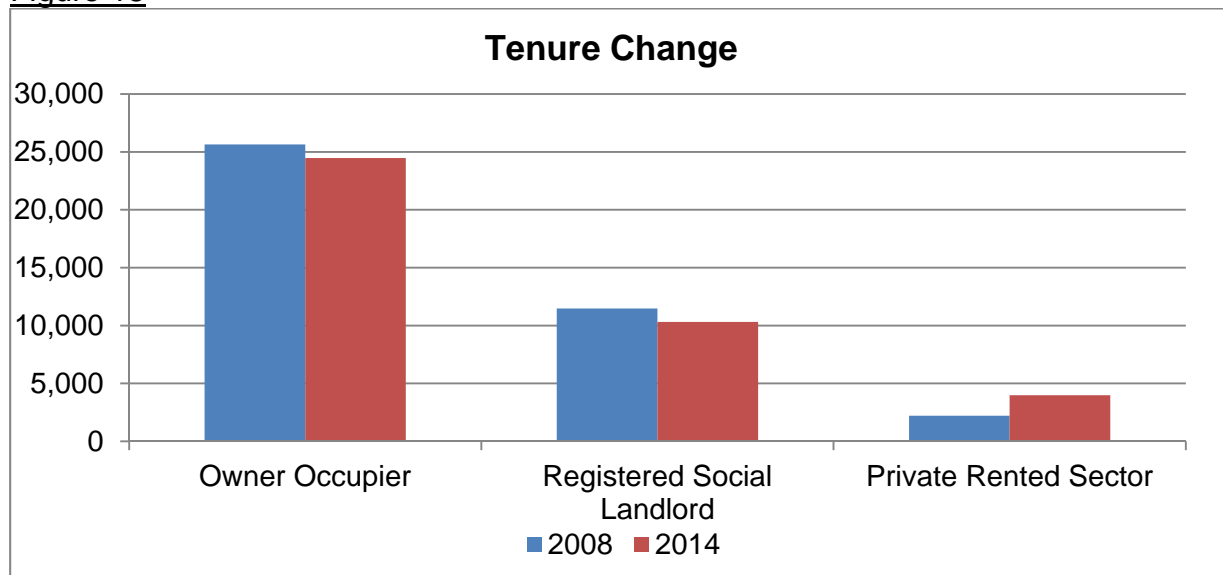


Source: National Records for Scotland

### Housing Market and Housing Needs

Owner occupation is the largest sector in Inverclyde (63%). The social rented sector accounts for 27% of the stock. There has been a significant rise in the private rented sector in recent years which now represents around 10% of all dwellings. This reflects national and indeed UK trends, given the favourable climate for investment in the sector, current market conditions and demand.

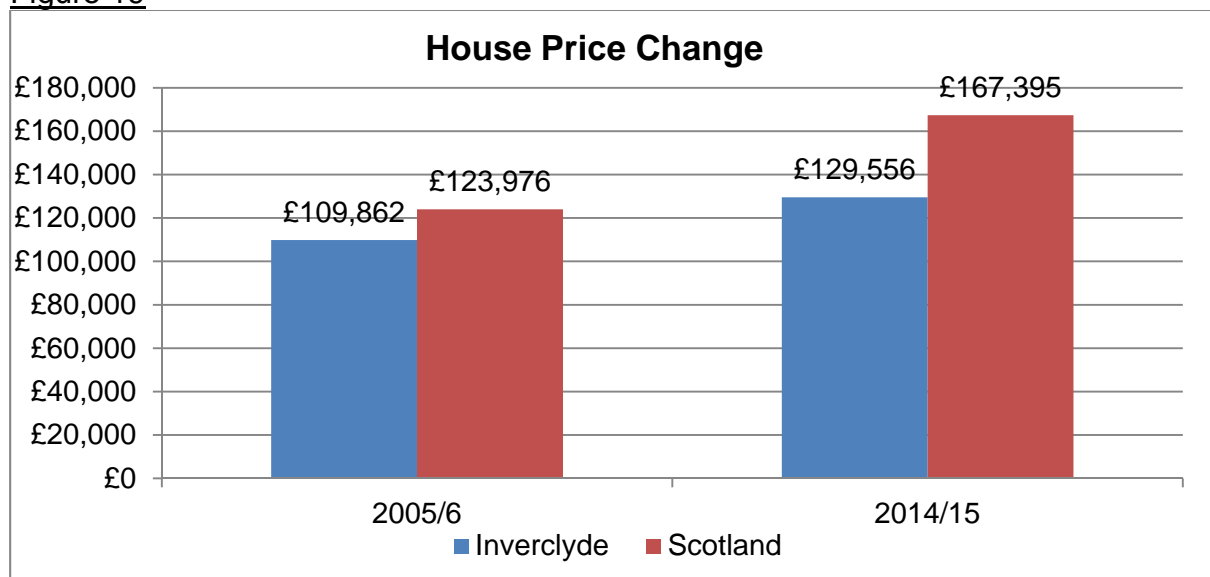
Figure 18



Source: Housing Needs and Demand Assessment 2011 and Assessors Stock Data, 2014

The average house price in Inverclyde is £129,556, which is lower than the Scottish average, indicating owner occupation is a more affordable option within Inverclyde than in other areas of Scotland.

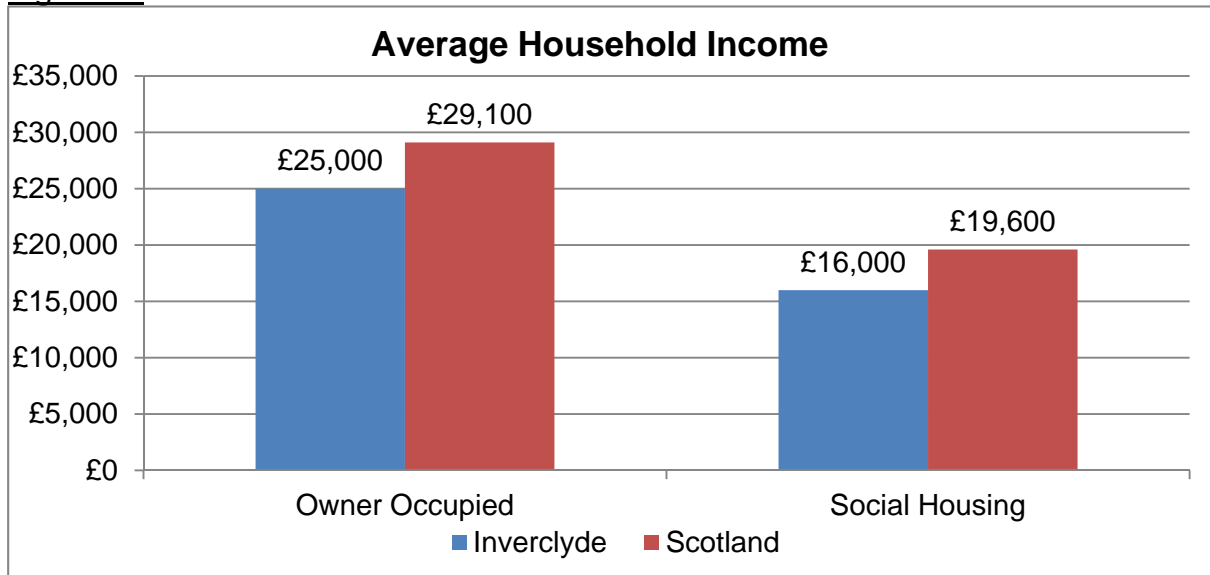
Figure 19



Source: Registers of Scotland 10 year Property Market Report 2005-2015

However lower house prices does not translate into greater purchasing power for Inverclyde residents. Inverclyde has a lower average income than Scotland as a whole, which indicates there are affordability issues; particularly since 14 of the 5% most deprived data zones in Scotland are located within Inverclyde.

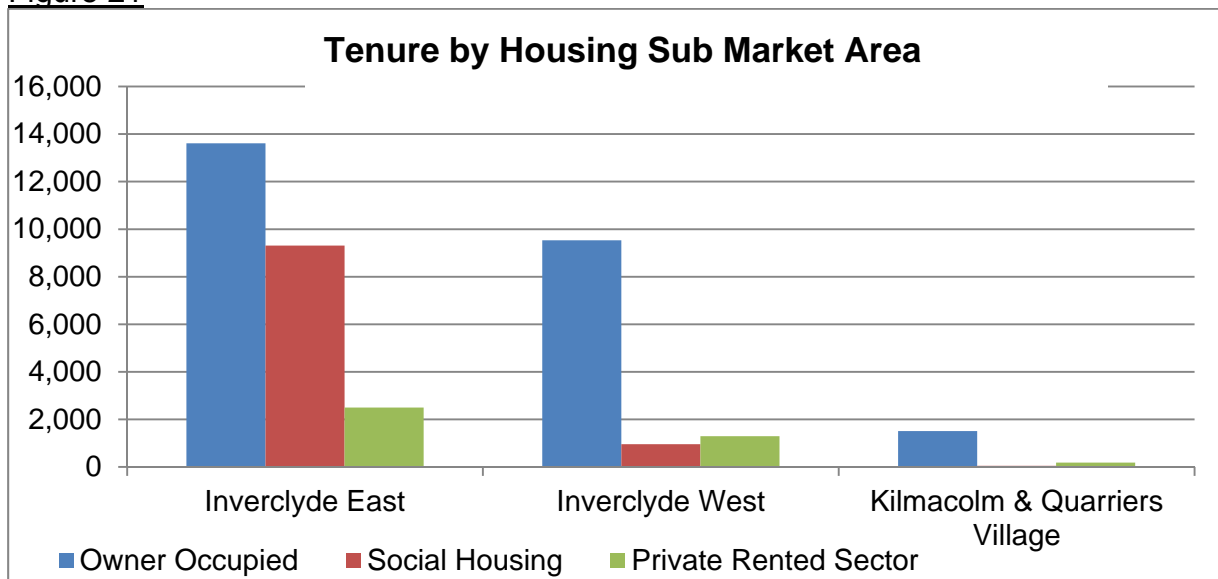
Figure 20



Source: Scottish House Condition Survey, 2011-2014, Scottish Government

Owner occupation is more prominent in the Inverclyde West (81%) and Kilmacolm & Quarriers Village (86%) housing sub-market areas (HSMA) with the income profile of households in these areas being above the Inverclyde average. Furthermore, these housing sub-market areas have the smallest proportion of local authority stock and therefore the highest pressure on social housing.

Figure 21



Source: Assessors Stock Data, 2014

Following stock transfer in 2007, Inverclyde Council no longer has housing to rent. Ownership and management of the former council housing stock was transferred to River Clyde Homes and Cloch Housing Association at that time. At present, households seeking access to social housing can choose to register through River Clyde Homes choice based lettings system and the Inverclyde Common Housing Register (ICHR).

As at February 2016, there were 4,674 households registered with River Clyde Homes as seeking a new home across Inverclyde. Of these, 3,885 (83.1%) were

new applicants and 789 (16.9%) were transfer applicants. In 2014/15, River Clyde Homes allocated 462 properties representing a turnover of around 10%.

## Town Centres and Retailing

### Port Glasgow

The total number of applications for development of town centre uses in Port Glasgow has fallen overall from 11 in 2011 to 8 in 2016. By 2016, a greater proportion of applications are for within the town centre and are being approved, largely due to the extension of the town centre in 2013 to include the Waterfront West development, where most of the applications are located.

Figure 22

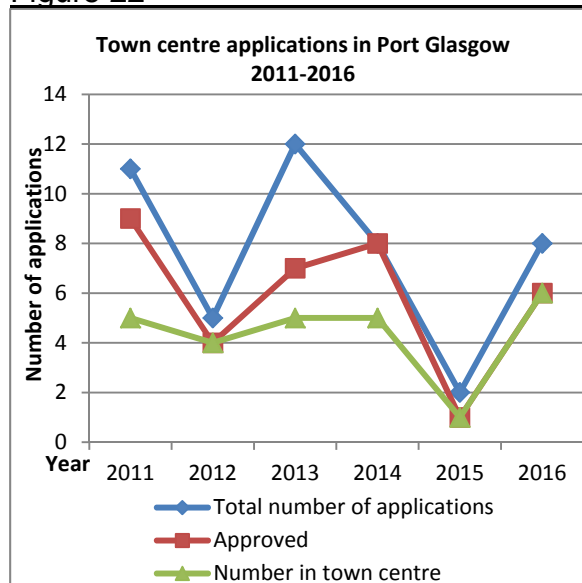
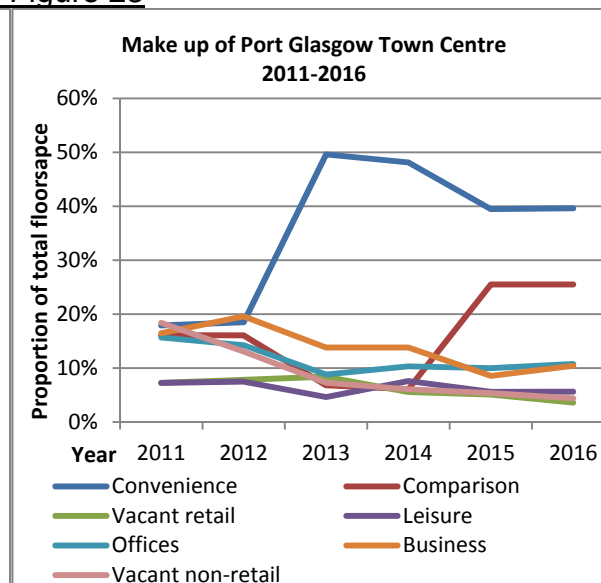


Figure 23



The inclusion of the Waterfront West site in the town centre in 2013 brought Tesco within the town centre, greatly increasing the proportion of convenience floorspace within the centre. The proportion of comparison floorspace increased in 2015 when B&Q opened. The inclusion of a large amount of new floorspace, as units have opened in the Waterfront West development, means that the decrease in the proportion of all other floorspace hides an increase in actual floorspace levels in leisure, offices, business and vacant retail, with the only decrease in floorspace being for vacant non-retail. The proportion of comparison floorspace will increase further in future as new units at the Waterfront West development open in 2017.

### Gourock

The number of applications for development of town centre uses has more than trebled in Gourock from 2 in 2011 to 7 in 2016, and nearly all of these have been in the town centre in each year. The majority have also been approved, with the exception of 2015 when 2 of the 5 applications were withdrawn.

Figure 24

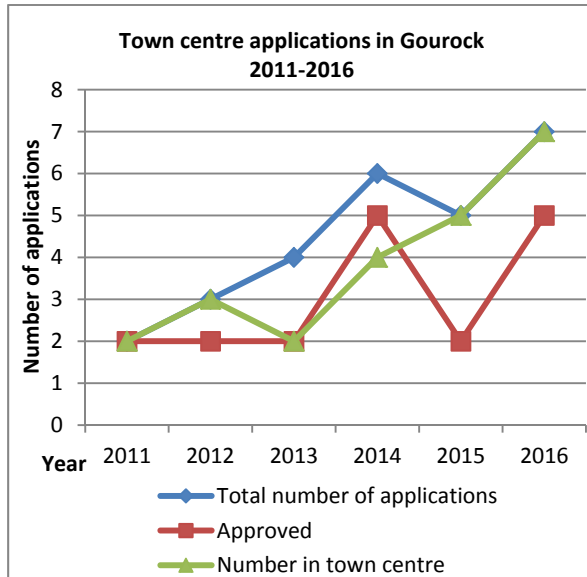
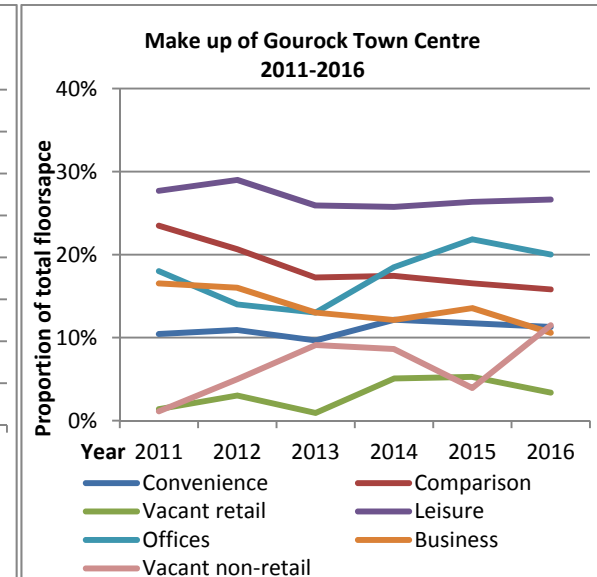


Figure 25



Leisure remains the predominant use in Gourock town centre, with offices overtaking comparison as the second largest use in 2014. Convenience has also risen to equal business use and vacancy levels have risen, particularly for non-retail uses.

Greenock

The total number of applications for development of town centre uses in Greenock increased from 29 in 2011 to a high of 38 in 2013, but dropped to 16 in 2016. The proportion of applications being approved has increased over time. The proportion of applications within the town centre increased up to 2015 but was low in 2016. Only a small number each year are within the primary shopping area.

Figure 26

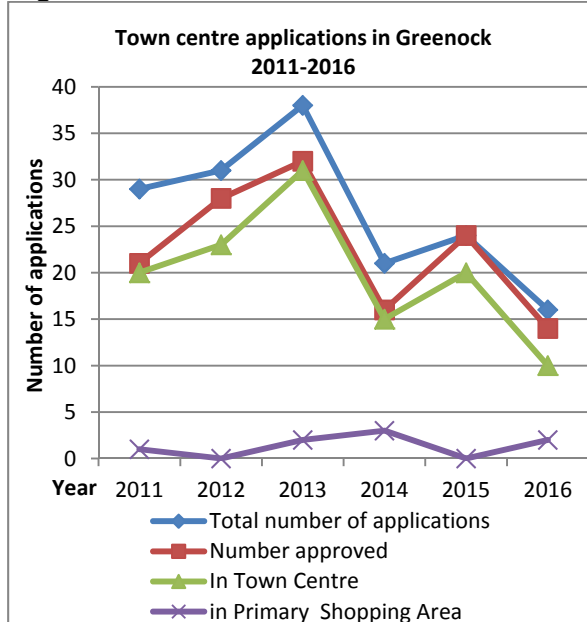
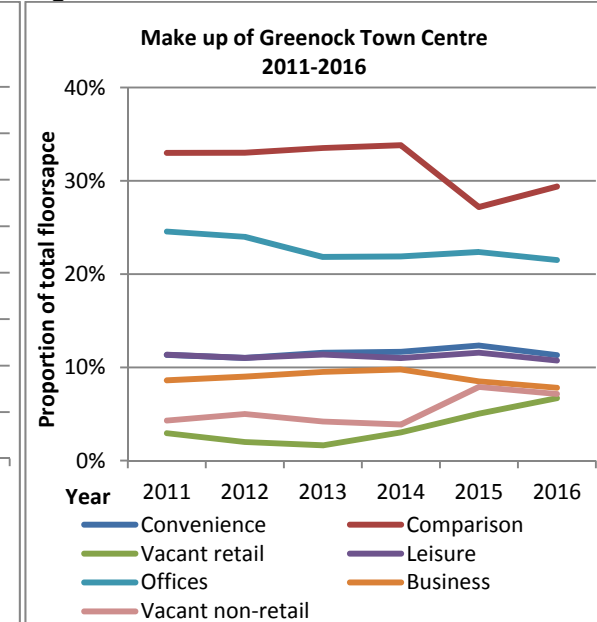


Figure 27



The makeup of the town centre has not changed from 2011 to 2016, with comparison the largest use in every year, despite a slight fall from 34% of floorspace in 2011 to 29% in 2016. Offices make up the next largest use, but have also fallen slightly from 25% of floorspace in 2011 to 22% in 2016. Convenience has become slightly more dominant than leisure since 2014 and is the next largest use in 2016,



while both vacant retail and non-retail have both increased to make up 7% of total floorspace in 2016, with slightly more non-retail units vacant than retail units.

## **Natural Heritage and Environmental Resources**

### **Nature Conservation Sites**

There are 2 Special Protection Areas in Inverclyde. The Inner Clyde Estuary Special Protection Area, which is also a Ramsar site and Site of Special Scientific Interest is designated for regularly supporting an internationally important wintering population of redshanks. The inland Renfrewshire Heights Special Protection Area and Site of Special Scientific Interest, designated in 2007, is an important breeding ground for hen harriers. There are 5 other Site of Special Scientific Interest, designated for geological, flora and fauna features.

**Table 1**

<b>Site</b>	<b>Area (ha)</b>	<b>Features</b>	<b>Condition</b>	<b>Designated</b>
Inner Clyde Estuary	1824	Redshank (non-breeding)	Favourable	2000
Renfrewshire Heights	8940	Hen harrier (breeding)	Unfavourable, declining	2007
Dunrod Hill	237	Carboniferous	Favourable	1990
Shielhill Glen	24	Fen meadow Lowland mixed broadleaved woodland	Unfavourable Unfavourable	1985
Knocknairs Hill	17	Fen meadow Lowland wet grassland	Favourable Recovering	1992
Dargavel Burn	11	Wetlands	Favourable	1984
Glen Moss	19	Basin fen Dragonfly	Unfavourable Favourable	1984
<b>Total</b>	<b>11072</b>			

### **Local Nature Conservation Sites**

There are currently 52 Local Nature Conservation Sites in Inverclyde (formerly known as Sites of Importance for Nature Conservation). These were designated between 1992 and 1999 and cover an area of 1349 ha. The condition of these has not been surveyed recently.

### **Open Space**

The Local Development Plan (2014) identifies 125 open spaces, totalling 611.2ha, with 66.4% within settlements and 33.6% within the Greenbelt. Table 2 shows that Greenock has significantly more sites and a much larger land area than any other settlement, which is to be expected as this is the main settlement. Figure 28 shows that both Quarriers and Port Glasgow have a greater provision of open space (including all open space types) per 1000 head of population. It should be noted that the high provision of open space within Quarriers is largely attributed to the very low population in this settlement.

Table 2

Area	No. of Open Spaces	Land Area (ha)
Port Glasgow	30	86.48
Greenock	59	243.88
Gourock	10	42.13
Inverkip	6	8.54
Wemyss Bay	8	13.77
Kilmacolm	3	7.47
Quarriers	2	4.34
<b>Total</b>	<b>118</b>	<b>406.61</b>

Figure 28

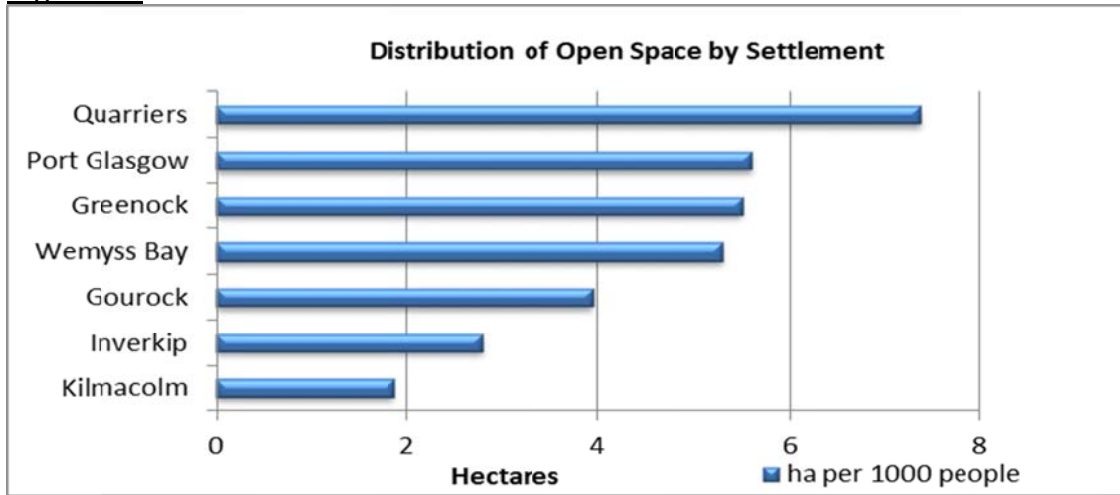
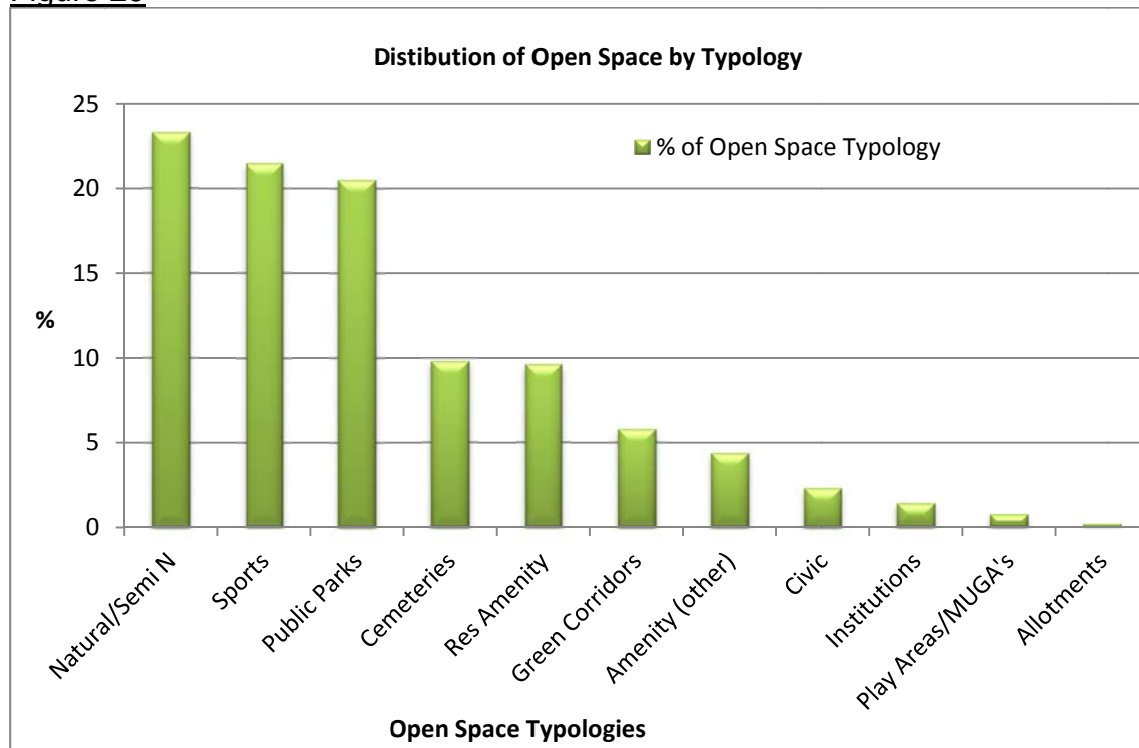


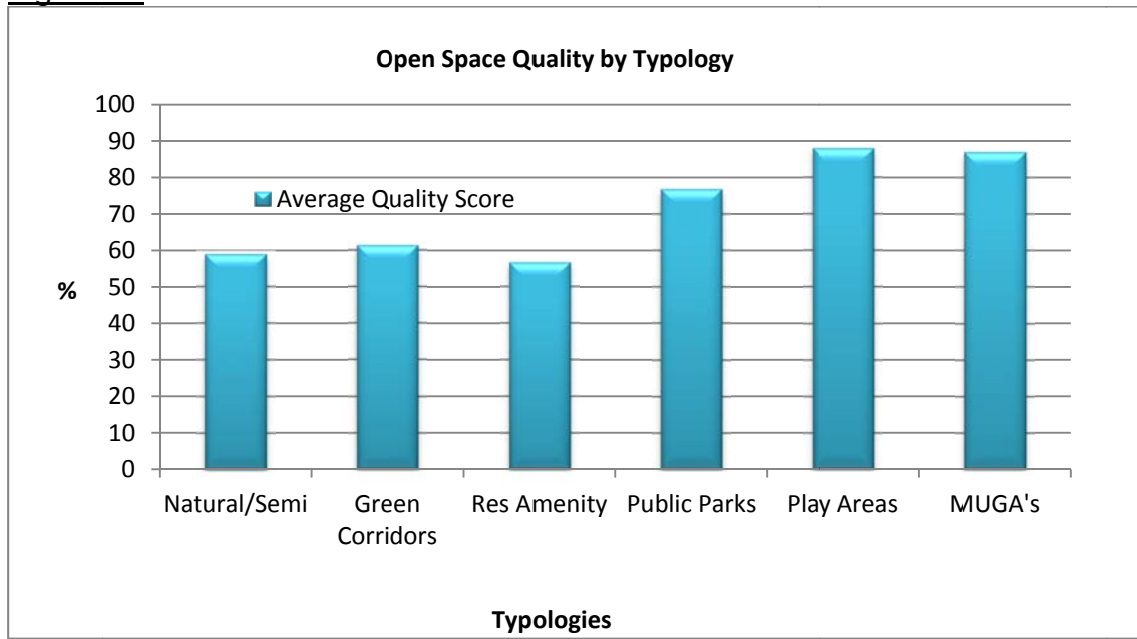
Figure 29 shows the distribution of open space typologies across all settlements, with natural areas, sports areas, and public parks accounting for 65% of all open space.

Figure 29



With regard to the quality of open space provision, Figure 30 shows the average quality score, expressed as a percentage, for each of the 6 typologies assessed during the Open Space Audit, which was completed in December 2015. While play areas and MUGA's both have a high average score, significant differences in their scoring criteria mean that they cannot be directly compared with the other typologies, which should be considered as a separate group. Of the remaining typologies, public parks and gardens scores significantly higher (approx. 15%) than natural areas, green corridors and residential amenity areas.

**Figure 30**

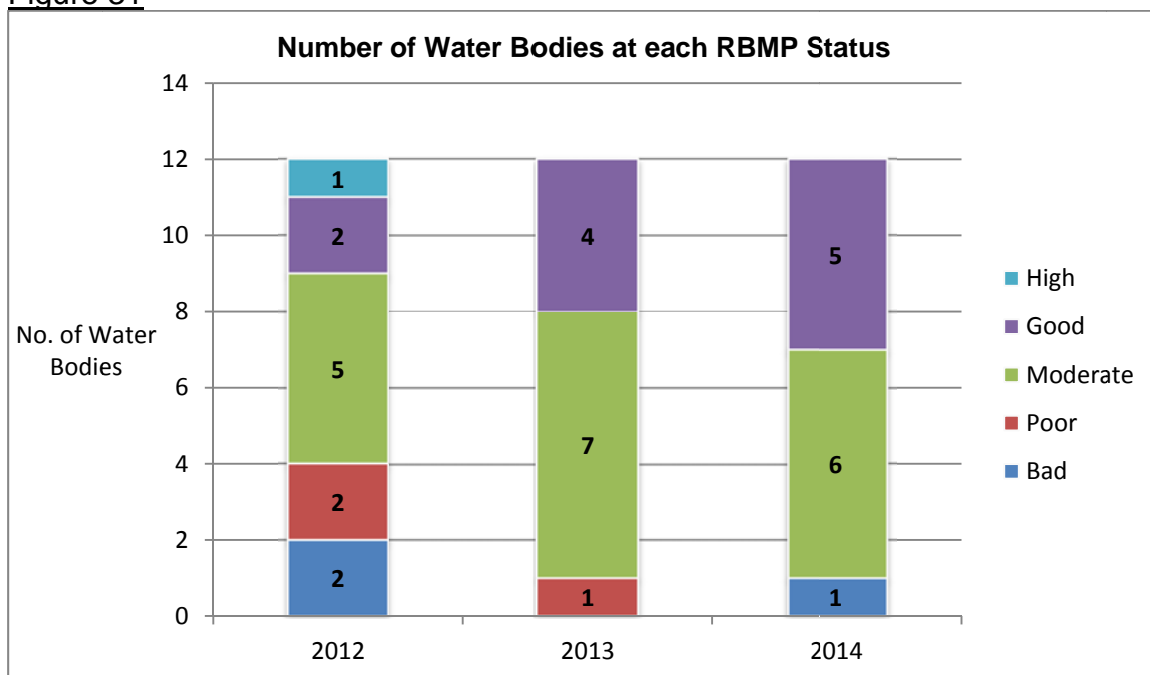


**Water**

The second cycle of the River Basin Management Plans updated the status of water bodies across Scotland in 2014. In Inverclyde, a total of 12 surface water bodies were identified across 3 catchments. Five have been classified as ‘good’, six ‘moderate’, and one ‘bad’. Figure 31 shows that since 2012, six water bodies have improved, 2 have degraded and four have not changed. By 2021, it is forecast that 7 water bodies will reach ‘good’ status and 5 ‘moderate’ status.

The majority of pressures concern abstraction/impoundment and morphological alterations, largely related to existing weir’s and dams.

**Figure 31**

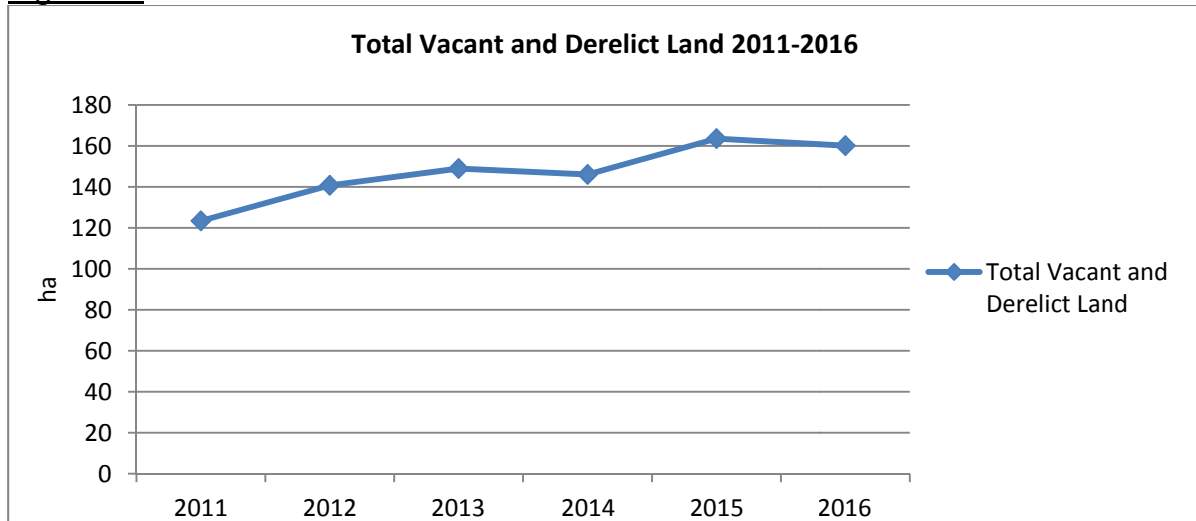


Source: SEPA Discover Data – Water Body Classifications

## Soil

The total vacant and derelict land area increased from 123.42ha in 2011 to 160.16ha in 2016, a rise of 29.7% (see Figure 32). The significant increase was largely the result of demolition works associated with housing renewal/regeneration projects and the addition of two large former IBM sites at Spango Valley, Greenock.

Figure 32

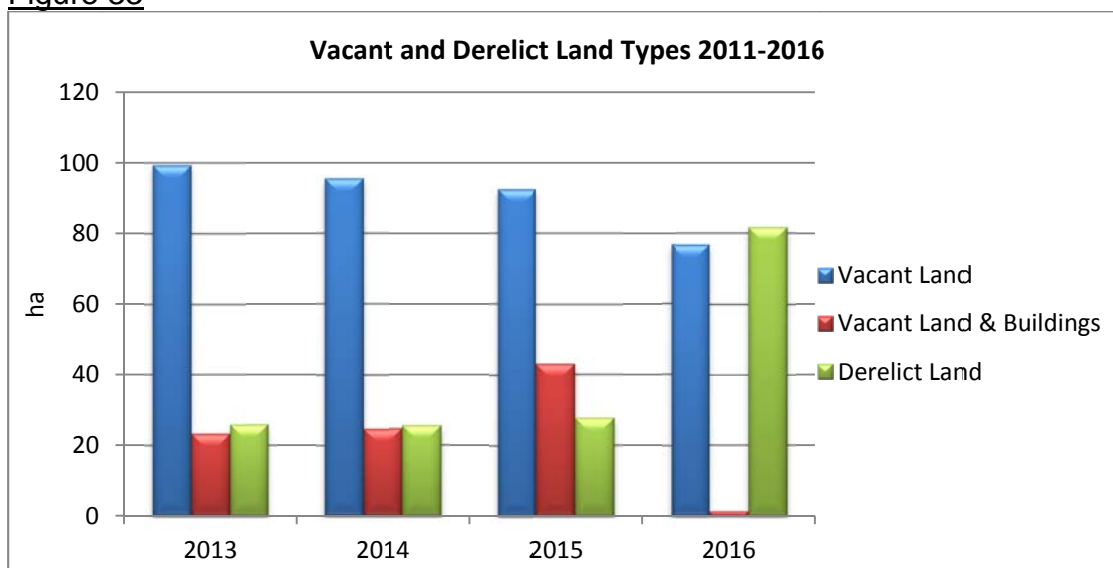


Source: Inverclyde Council – Vacant and Derelict Land Survey

Figure 33 provides a detailed breakdown of the individual Vacant and Derelict Land types. It can be seen that vacant land and buildings increased by 18.3% in 2015, largely as a result of a large site at Spango Valley being added. The significant decrease evident in 2016 was due to the Former Inverkip Power Station site being re-categorised as derelict.

Derelict land rose significantly in 2016, due to 12 sites being added to this category, either in light of new information or to align more closely with the Scottish Government Guidance. The majority of this increase relates to the addition of two large sites, the Former Inverkip Power Station site (21.45ha) and Valley Park, Spango Valley (18.31ha).

Figure 33



Source: Inverclyde Council – Vacant and Derelict Land Survey

## **Built Heritage and Townscape**

### Archaeology

Inverclyde has 33 Scheduled Monuments within its boundary. These are largely in the rural areas and apart from the industrial archaeology of the Greenock Cut consist of cairns, forts and hut circles. Within the urban area, there is Newark Castle, a 15<sup>th</sup> century tower house and gate house on the banks of the Clyde at Port Glasgow and the Kempock Stone at Gourrock – a bronze age standing stone from around 2000BC which has, in latter times been associated with superstition and witch craft. There are numerous sites of more local archaeological interest.

### Listed Buildings and Buildings at Risk

There are 247 listed buildings within Inverclyde, of which 25 are A-listed (see Figure 34). There are 16 listed buildings within Inverclyde on the Scottish Civic Trust Buildings at Risk Register, plus a further 4 non-listed buildings (see Figure 35).

**Figure 34**

<b>Settlement</b>	<b>Category A</b>	<b>Category B</b>	<b>Category C</b>
Inverkip	1	9	1
Gourock	0	21	44
Greenock	14	68	29
Kilmacolm	4	15	4
Port Glasgow	5	13	3
Quarriers Village	0	4	7
Wemyss Bay	1	1	3

**Figure 35**

<b>Site</b>	<b>Listing</b>	<b>Risk</b>	<b>Condition</b>
Ancillary Buildings, Cloch Lighthouse Gourock	B	Low	Ruinous
Bearhope Street Greenock	B	Fair	Moderate
St George's North Church George Square Greenock	B	Low	Fair Restoration in Progress
Balrossie School Water Tower Kilmacolm	B	High	Poor
Balrossie School Main Building Kilmacolm	B	High	Very poor
Balrossie School Ancillary Building Kilmacolm	B	High	Poor
Balrossie School Annex Kilmacolm	B	High	Poor
Ravensraig Hospital Greenock	B	Moderate	Fair

Clune Park School Robert Street Port Glasgow	B	Low	Fair
Scott's Dry Dock Rue End Street Greenock	A	Moderate	Poor
Tobacco Warehouse Clarence Street Greenock	B	Low	Fair
Greenock Crematorium Tempietto South Street Greenock	B	Moderate	Poor
Clune Park Church Robert Street Port Glasgow	B	High	Very poor
Glebe Sugar Refinery Ker Street Greenock	B	High	Poor
James Watt Dock Sugar Warehouses East Hamilton Street Greenock	A	Low	Poor
Broadfield Hospital Old Greenock Road Port Glasgow	A	High	Ruinous
Police House Main Street Inverkip	Unlisted	Moderate	Poor
Burial Vaults of Shaw Stewarts Millhouse Road Inverkip	Unlisted	Moderate	Poor
Former Babylon Nightclub Argyle St/W. Stewart St Greenock	Unlisted	High	Poor
Garvock Old Largs Road Loch Thom	Unlisted	High	Very poor

### Conservation Areas

There are 8 conservation areas in Inverclyde.

Figure 36

<b>Name</b>	<b>Designated</b>
Greenock West End	1987 Amended 2007
Kilmacolm (South West)	1976
Kilmacolm, The Cross	2015
Inverkip	1976 Amended 2015
Quarrier's Village	1986

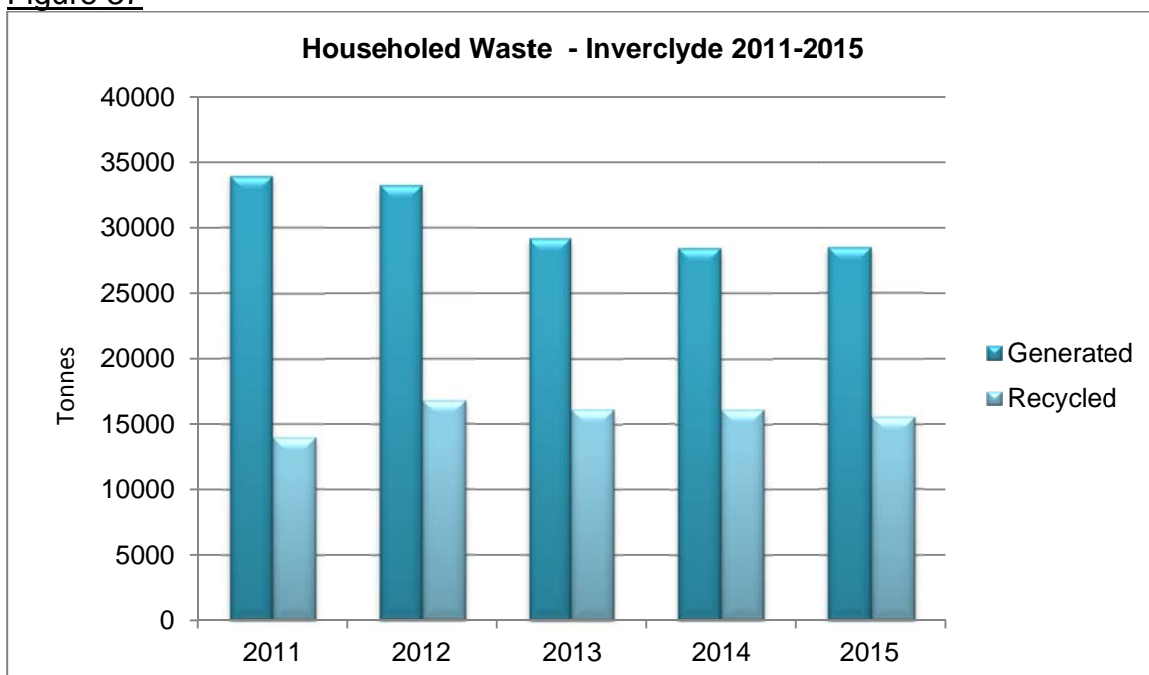
	Amended 2005
Cathcart St/William St, Greenock	1976 Amended 1989
Kempock St/ Shore St, Gourrock	2015
West Bay, Gourrock	2015

## **Energy Planning and Service Infrastructure**

### Waste

The generation of household waste in Inverclyde fell by 16% between 2011-2015, with recycling increasing by 11.4% over the same period (see Figure 37). Inverclyde Council was one of only 9 Councils in Scotland which exceeded the Scottish Government's household waste recycling target of 50% in 2013. This was achieved through the Council's recycling collection service for paper, card, cans, plastics and food waste.

**Figure 37**



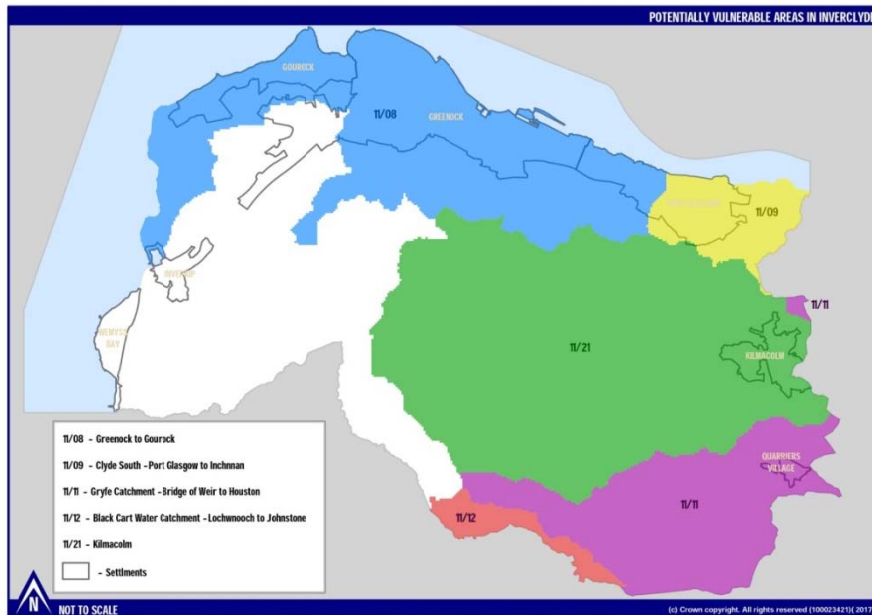
Source: SEPA Household Waste Data



## Flooding

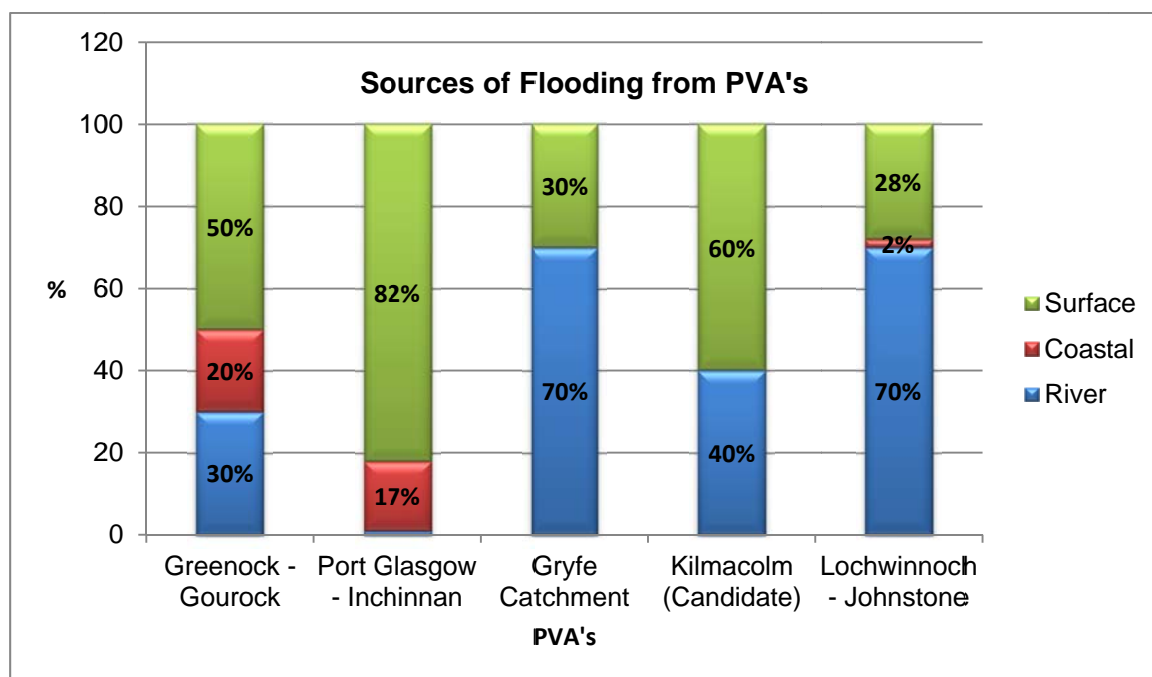
Inverclyde has four Potentially Vulnerable Areas (PVA's) and one candidate Potentially Vulnerable Areas. These are shown in Figure 38. The 'Clyde South – Port Glasgow' and 'Greenock to Gourock' PVA's, which cover the waterfront area from Port Glasgow to Inverkip, are the most significant areas in terms of potential flooding impact as they have a large population and include the main transport routes.

Figure 38



The sources of flooding from each PVA are set out in Figure 39

Figure 39



Source: SEPA Clyde and Loch Lomond Flood Risk Management Strategy 2015

## **Review of Inverclyde Local Development Plan (2014)**

This section of the Monitoring Statement follows the structure of the Inverclyde Local Development Plan (2014). It identifies changes in the policy context and development on the ground since the preparation of that Plan commenced. It also reviews the use and wording of the current Local Development Plan policies. For each topic area it concludes by identifying potential issues for the Main Issues Report or Proposed Plan.

### **A Sustainable Development Strategy (Chapter 2)**

#### Policy Context

A revised National Planning Framework (NPF3) and Scottish Planning Policy were published in June 2014. These documents identify four outcomes for the planning system in Scotland:

- A successful, sustainable place
- A low carbon place
- A natural, resilient place
- A more connected place

Scottish Planning Policy identifies two Principal Policies with related Policy Principles. These are:

- Sustainability - >a presumption in favour of development that contributes to sustainable development.
- Placemaking - >planning should take every opportunity to create high quality places by taking a design-led approach  
>planning should direct the right development to the right place  
>planning should support development that is designed to a high quality, which demonstrates the six qualities of successful place

The Glasgow and the Clyde Valley Strategic Development Plan (Clydeplan) Proposed Plan was published in January 2016. It is guided by the national planning outcomes and presents a vision of a compact city region based around the area's centres, regeneration, a rebalanced economy focused on key economic sectors, low carbon infrastructure and placemaking. The Clyde Waterfront, the Green Network and River Clyde are the components of the Spatial Development Strategy that are most relevant to Inverclyde. The Plan supports the Glasgow and Clyde Valley City Deal Programme.

The Glasgow and Clyde Valley City Deal has established a £1.13 billion Infrastructure Fund to support the delivery of an improved transport network across Glasgow and the Clyde Valley, key development and regeneration sites, and improved public transport. Three of the infrastructure fund projects sit within Inverclyde. These are Ocean Terminal and Inchgreen, in Greenock and Inverkip Power Station, near Wemyss Bay.

#### Policy Review

**Policy SDS1** promotes the reduction of greenhouse gases and mitigation and adaptation to climate change.

**Policy SDS2** promotes the integration of land use and sustainable transport.

**Policy SDS3** promotes high quality placemaking in all new developments.

**Policy SDS4** safeguards and promotes the enhancement of the Green Network.

**Policy SDS5** states a preference for all appropriate new development to be located on previously used land within the urban settlements.

**Policy SDS6** promotes and safeguards the area's three town centres.

**Policy SDS7** directs appropriate new investment to the Waterfront and the Major Areas of Change and Areas of Potential Change.

**Policy SDS8** presumes against the spread of the built up area into the Green Belt and seeks to prevent sporadic development in the Countryside.

These policies form the Sustainable Development Core Policies and Sustainable Spatial Strategy Key Policies of the Plan, and together can be viewed as establishing guiding principles for the Plan. Whilst these remain valid, for Development Management purposes they have often proven too high level for practical use, and are duplicated by more practical and detailed policies throughout the Plan. As such, it is considered that they could be more accurately referred to as principles of the overarching spatial strategy rather than policies.

### Issues for new Plan

The Main Issues Report should consider the validity of the Sustainable Development Strategy.

For the Proposed Plan consideration will be given to whether the Sustainable Development Strategy policies should be carried forward as guiding principles. Consideration will also be given to including an overarching 'placemaking' policy.

### **Major Areas of Change and Potential Change (Chapter 3)**

#### Changes on the Ground

This section records progress on the Major Areas of Change, Areas of Potential Change and Development Option sites that are identified in the Local Development Plan 2014.

The Harbours Greenock (MAC1) – The Beacon Arts Centre was completed in 2012. Planning permission for a bar / restaurant adjacent to the A8 road was granted planning permission in 2013, with the development completed in 2014.

James Watt Dock/Garvel Island, Greenock (MAC2) – James Watt Dock LLP continues to develop out the marina. The final phase in the South Basin was completed in June 2015, providing 25 additional berths.

Gourock Bay (MAC3) – No progress/change.

Former Inverkip Power Station, by Wemyss Bay (MAC4) – The final significant structure on the site, the landmark chimney, was demolished in July 2013 with the majority of the rest of the buildings on site now also demolished. A £3.8m City Deal project will support delivery of the site by improving the restricted network and junction capacity on the A78 at four locations in and around Inverkip. The project was approved by the City Deal Cabinet in October 2015..

Woodhall, Port Glasgow (MAC5) – Phase 1, providing 97 social rent and 5 shared equity units was completed in 2012. Since then 2 further phases, providing 36 further social rent units have been completed and another 18 social rent units are planned. This equates to 44% of the overall site. This has included provision of part of the ‘green spine’ set out in the Development Framework, along with open space and play park provision.

Peat Road/Hole Farm, Greenock (MAC6) – Demolition work on the site is now complete and this development remains a priority for the Council as identified in the Strategic Housing Investment Plan 2017-2022.

Spango Valley, Greenock (MAC7) – With regard to the prison, a planning application for ‘Matters Specified by Condition’ was approved in 2014/15. Following the closure of the Call Centre in September 2016, the middle part of the area, formerly known as Valley Park, is now entirely comprised of vacant and derelict buildings. The southern part of the site was cleared in 2009 and remains vacant land.

Central East Greenock (APC1) - A masterplan for Central East Greenock was approved by Inverclyde Council in Jan 2014. Planning approval for a Horticultural Training & Community Centre on Mearns Street was granted in 2014, with an amendment granted in 2016. Inverclyde Council and Riverside Inverclyde continue to progress the Bakers Brae Road Realignment project, with a design team appointed in 2016. Inverclyde Council and Riverside Inverclyde are working together to develop an Enterprise Hub along the west side of Baker Street.

Inner Lower Port Glasgow (including Clune Park) (APC2) – The Clune Park Area Regeneration Plan was approved in 2012. A Tolerable Standard Assessment of all 430 flats, along with an external condition survey in June 2013 led to an agreement to make Demolition Orders on 42 tenements, in addition to the 3 tenements and one single property that were already the subject of Demolition Orders. Following appeals against these orders, the Sherriff found in favour of the Appellants in August 2016. The situation is being monitored with an aim to progress demolitions as quickly as possible. 62 units have been provided at Lower Mary Street and Woodhall to re-home people moving out of Clune Park, leaving approximately 50 flats occupied as at September 2016.

Regent Street, Greenock (DOS1) – No progress/change.

John Street, Greenock (DOS2) - River Clyde Homes completed the refurbishment of the existing flats in 2015. In light of this, John Street should not be designated as a Development Option Site in the next Local Development Plan.

Sinclair Street, Greenock (DOS3) - The site continues to be used by Morton FC as a temporary car park on match days.

### Policy Review

**Policy MAC1-7** supports redevelopment of the Major Areas of Change

**Policy APC1-2** supports redevelopment of the Areas of Potential Change

**Policy DOS1-3** supports redevelopment of the Development Option Sites

These policies are supported by the Supplementary Guidance on Local Development Frameworks.

### Issues for new Plan

The Main Issues Report should consider the following:

- Whether the current Local Development Plan approach to the Spango Valley (MAC7), specifically the Canmoor and Sanmina sites, is still valid or an alternative mix and distribution of uses is required to progress development.
- Whether the new Local Development Plan should reflect the Central East Greenock masterplan, including the area to be covered by the Area of Change.
- Whether the strategies for the other MAC, APC and DOS sites (with the exception of John Street) should be carried forward.

Other potential changes for inclusion in the Proposed Plan are the inclusion of the development frameworks for these sites in the Local Development Plan itself rather than in Supplementary Guidance.

## **Economy and Employment (Chapter 4)**

### Policy Context

National Planning Framework 3 emphasises the role of cities as the main driver of our economy and focuses on Scotland's key economic sectors: energy; food and drink; life sciences; tourism; financial and business services; universities and the creative industries.

The revised Scottish Planning Policy, to a large extent, continues the approach set out in the previous version; requiring Local Development Plans to allocate sites that meet the diverse needs of businesses in a way that is flexible to enough to accommodate changing circumstances. Scottish Planning Policy also continues to emphasise the need for allocations to be informed by relevant economic strategies and business land audits. and highlights the importance of considering a wider range of uses on sites that are underused. While the revised Scottish Planning Policy places more emphasis on assessing economic benefits, with *due weight to net economic benefit* now the preferred approach, this will not significantly impact on the next plan.

The Proposed Clydeplan Strategic Development Plan (2016) carries forward the Strategic Economic Investment Locations (SEILs) identified in the previous Strategic Development Plan, on the basis that they align with Scottish Enterprise's locational priorities and could make a significant contribution to the Scottish Government's key economic sectors. Inverclyde has one SEIL, the 'Inverclyde Waterfront', which is identified for Green Technologies and Business and Financial Services. A key policy change is the requirement for Local Development Plans to identify the locations and circumstances when other uses commensurate to the scale of the Strategic Economic Investment Locations non-dominant role and function will be supported. The Proposed Clydeplan Strategic Development Plan also carries forward the four Strategic Freight Transport Hubs, which have been selected because they maximise access to ports, rail networks and airports, with Greenock Ocean Terminal facilitating road to sea freight transfers.

## Changes on the Ground

Over the past five years, Riverside Inverclyde (URC) have refurbished or re-developed business space at Custom House and Victoria House in Greenock, Scarlow House in Port Glasgow and Municipal Buildings in Gourock. In 2015, Riverside Inverclyde also completed four light industrial units (41,983sqft) within Kelburn Business Park, Port Glasgow.

Within the Inverclyde Waterfront Strategic Economic Investment Location, Riverside Inverclyde completed an office development of 21,230sqft in 2013. At Inverclyde Council's Pottery Street depot, a Civic Amenity Centre was completed in 2014, while construction of a vehicle maintenance facility and associated offices and facilities is currently under construction.

There has been significant redevelopment of Ferguson's Shipyard in Port Glasgow, following a change of ownership in 2014. This includes the refurbishment and extension of the fabrication yard and the construction of new offices and welfare facilities.

With regard to Tourism, cruise liner activity at Greenock Ocean Terminal has experienced significant growth in recent years, with 194% rise in the numbers of liners and a 393% rise in the number of passengers between 2007 and 2015. The Glasgow and Clyde Valley City Deal project at Ocean Terminal, which was approved by the City Deal Cabinet in Oct 2015, will provide £14m of investment aimed at growing the cruise liner business by extending the quayside, providing a dedicated terminal and improving access.

Significant planning permissions include the 2016 approval of a 1126sqm expansion of the McKenchie Jess food manufacturing plant in Port Glasgow.

Within Port Glasgow Industrial Estate, DB Apparel vacated their premises in 2016. This has resulted in the eastern half of the central area now being comprised of vacant and derelict buildings.

Within the Valley Park site in Spango Valley, the Call Centre closed in Sept 2016. This site is now comprised of vacant and derelict buildings, while the Sanmina site to the south remains vacant land.

## Policy Review

### **Policy ECN1** safeguards existing Business and Industrial Areas

The policy remains valid and should be retained, subject to minor rewording to aid clarity.

### **Policy ECN2** identifies Business and Industrial Development Opportunities

The policy remains valid and should be retained.

### **Policy ECN3** safeguards the character and amenity of Business/Industrial Areas

Policy to be deleted. Character and amenity issues to be addressed under a new amenity/placemaking policy.

**Policy ECN4** provides criteria for assessing business and industrial proposals out with the designated areas.

Policy to be deleted. Business and industrial proposals outwith designated areas to be assess through policy covering that specific area and general placemaking policy.'

**Policy ECN5** promotes working from Home

Policy to be deleted. Impacts on amenity and traffic to be assessed under a new amenity/placemaking policy and relevant transport policies.

**Policy ECN6** provides criteria for assessing Tourist Facilities and Accommodation.

The policy remains valid and should be retained, subject to:

- minor rewording required to provide more positive support for tourism proposals.
- Reference should be made to Schedule 4.2 Tourism Opportunities.
- 

#### Issues for the new Plan

The Main Issues Report should consider the following:

- Whether an alternative approach to the central ECN1(c) area of Port Glasgow Industrial Estate is required to address longstanding vacancy and dereliction issues.
- Whether an alternative mix and distribution of uses should be identified on the Spango Valley MAC7, in order to progress development.

Potential changes for inclusion in the Proposed Plan are a rationalisation of the policy framework through deletion and merging of policies.

### **Transport and Connectivity (Chapter 5)**

#### Policy Context

National Planning Framework 3 reflects the Scottish Government's commitment to strengthening transport links within Scotland and to the rest of the world through infrastructure investment. The Framework also affords a number of transport projects national significance, including high speed rail links.

The revised Scottish Planning Policy largely continues the approach set out in the previous version; requiring development plans to promote opportunities for travel by more sustainable modes and facilitate integration between modes. In addition, plans should, where possible, enable freight movement by rail or water and address the transport needs of ports. Where necessary, plans should also identify any new transport infrastructure or public transport services. Significant changes include stronger support for electric vehicles and the requirement for development plans to identify active travel networks.

The Proposed Clydeplan Strategic Development Plan (2016) carries forward the approach of the previous Strategic Development Plan through a Vision and Spatial Development Strategy which promotes sustainable transport options and further integrates land use and transport. The Proposed Strategic Development Plan places a greater emphasis on active travel through a new policy on Strategic Walking and

Cycling Network, which requires development plans to identify and safeguard existing walking and cycling networks and promote opportunities for enhancement of these networks. The Plan also identifies an indicative active travel network.

### Changes on the Ground

In 2016, Riverside Inverclyde (URC) completed a £5.2m regeneration project at Gourock Pierhead, which included a new road system aimed at improving traffic flow in the town centre area. Riverside Inverclyde (URC) are also progressing the realignment of Baker Street at its junction with Drumfrochar Road, with a design team appointed in 2016. This project will significantly improve traffic flows in the Mearns-Drumfrochar Road and unlock the development potential of the area.

The Greenock Parking Strategy was introduced in 2014.

In October 2015, the City Deal Cabinet approved a £3.8m project to address the restricted network and junction capacity on the A78 at Inverkip. This will enable development of the Inverkip Power Station site.

Planning and Road Construction consent were granted in June 2016 for a new spur road off the Tesco roundabout at Port Glasgow. This will create a direct link from the A8 directly onto Princes Street in the town centre.

A Core Path Plan review was completed by the Local Access Forum in May 2016. A work plan has been developed to undertake identified improvements, which includes a £25,000 upgrade at Woodhall.

An extension to N75 National Cycle Route, from its previous termination at Lunderston Bay to the marina at Inverkip, was completed in 2014.

A feasibility study for an extension to the N75 National Cycle Route from Inverkip to the rail station and ferry terminal at Wemyss Bay was completed in March 2015.

### Policy Review

**Policy TRA1** manages the impact of new development on the transport network, specifically the strategic road network and the public transport network. Also supports the actions identified in the Local Transport Strategy.

The policy remains valid and should be retained, subject to the inclusion of:

- impacts on the local road network and ferry routes.
- specific assessment criteria
- thresholds/guidance on when a transport assessment will be required
- a clearer distinction between the 'safeguarding' and 'supporting/promoting' elements of the policy.

**Policy TRA2** supports sustainable travel by directing new development to locations accessible by walking, cycling and public transport, while also safeguarding existing active travel routes.

The policy remains valid and should be retained, with the addition of:

- specific assessment criteria



- a requirement for applicants to demonstrate how a proposal will promote sustainable travel modes.
- clarification on when a transport assessment/travel plan will be required.
- identification of, and reference to the active travel network
- support for electric vehicle charge infrastructure
- a clearer distinction between the 'safeguarding' and 'supporting/promoting' elements of the policy.

**Policy TRA3** supports significant new road and parking proposals and safeguards the land necessary for their development.

Delete policy as TRA1 offers sufficient support for the actions identified in the Local Transport Strategy.

**Policy TRA4** sets out when developer contributions will be required to provide the transport infrastructure to allow a development to proceed.

This policy remains valid and should be retained, subject to:

- a reference to the Council's Planning Guidance on Developer Contributions.
- Further consideration on whether it would be more appropriate within a dedicated developer contributions chapter/section.

### Issues for new Plan

The Main Issues Report should consider the following:

Through the Call for Sites exercise, Kilmacolm Civic Trust identified long stay parking as an issue that causes difficulty and frustration for residents, businesses and visitors to Kilmacolm. The Civic Trust have identified several potential sites for the construction of up to four long stay car parks in or near Kilmacolm village centre. See Main Issue 24.

Other potential issues for Proposed Plan are the impact of the preferred development strategy on the trunk road network, and particularly the A78.

## **Housing and Communities (Chapter 6)**

### Policy Context

National Planning Framework 3 identifies a need for a generous supply of housing land in sustainable places where people want to live. It identifies regeneration as the central focus of planning across the Glasgow and Clyde Valley region.

Scottish Planning Policy states that provision for new homes should be made in areas where there is a need for regeneration and directs the planning system to identify a generous supply of land in each housing area, maintaining at least a 5 year effective land supply at all times. Plans should enable a range and choice of good quality housing in appropriate locations to support the creation of sustainable mixed communities and successful places, and focus on the delivery of allocated sites. The scale of residential allocation in the plan should be informed by a robust Housing Need and Demand Assessment. Where this identifies a shortfall in specific types of

housing, such as affordable housing or that required for specialist needs or specific groups, this should be also be addressed.

The Proposed Clydeplan Strategic Development Plan (2016) aims to create high quality places which deliver the right types of homes in the right places through the prioritisation of regeneration activities, the reuse of previously used land and higher density development. It seeks to provide a generous and effective supply of land for housing.

A Housing Needs and Demand Assessment was undertaken by the Glasgow and Clyde Valley Housing Market Partnership as part of the preparation of Clydeplan and was signed off by the Scottish Government Centre for Housing Market Analysis as robust and credible in May 2015. The Housing Needs and Demand Assessment estimates the number of additional homes required to meet existing and future housing need and demand.

The Proposed Clydeplan Strategic Development Plan (2016) includes a policy framework which seeks to support the delivery of new housing, including affordable housing. This includes the identification of an all-tenure Housing Supply Target and Housing land Requirement.

### Changes on the Ground

There has been a significant amount of progress on developments on the ground in Inverclyde over the last five years. This includes:

- The development by Manor Kingdom (now Avant Homes) at Kip Marina is complete (218 units) and Persimmon completed their development at Gibshill (52 units)
- the Persimmon Homes development at Kingston Dock is almost complete (343 units), as is the Springfield Properties/Stewart Milne Homes development at Hill Farm (264 units) and Merchant Homes development at The Gantocks, Gourrock (69 units)
- Oak Tree Housing Association's developments at Earnhill Road are complete, providing 29 units and development is underway at Garvald Street that will provide another 45 units.
- Cloch Housing Association completed phases 2-5 at Maukinhill, providing 145 units of which 2 are shared equity.
- River Clyde Homes have completed 3 phases at Woodhall, providing 138 units, of which 5 are shared equity with another phase of 18 units due to start on site in 2017. They have also completed developments in East Greenock (Gilmour/Fairrie Street, etc.), Cumberland Road and Banff Road in Greenock South West and Oronsay in Port Glasgow (372 units, of which 20 are shared equity) and have 41 units under construction at Bay Street, Port Glasgow.
- Link developed 46 properties at Lower Mary Street, of which 8 are shared equity.

In terms of placemaking, a green link has been integrated into the first phases of the development at Woodhall, along with 2 new play areas. Substantial environmental improvements are also planned as part of the redevelopment of Broomhill by River Clyde Homes. New community centres have also been provided at Gibshill and Inverkip, with another under construction at Broomhill.

The affordable housing policy has been used twice, with Section 75 agreements in place to deliver a commuted sum and off-site provision of social rent units.

## Policy Review

**Policy RES1** safeguards the character and amenity of residential areas

This policy applies to two different sets of circumstances – the protection of existing residential areas and the quality new residential developments. It should be split into two policies, one for each situation.

**Policy RES2** promotes development on urban brownfield sites

This policy is not essential, and may be removed or incorporated into another policy.

**Policy RES3** identifies residential development opportunities

This could be incorporated into a policy relating to the quality of new residential development.

**Policy RES4** sets out the circumstances under which an affordable housing contribution will be sought.

This matter is considered by Issue 12 in the Main Issues Report

**Policy RES5** sets out criteria for assessing proposals for changes of properties to residential use.

This needn't be a stand-alone policy

**Policy RES6** sets out criteria for assessing non-residential development within residential areas

This could be merged with the policy relating to safeguarding the character and amenity of residential areas.

**Policy RES7** sets out criteria for assessing residential development in the Green Belt and Countryside

There should be a single policy for assessing development of any sort in the green belt and countryside.

## Issues for new Plan

The Main Issues Report should consider the following:

- whether there is sufficient housing land to meet housing supply targets in the relevant housing market areas.
- whether the affordable housing contribution policy should be changed.
- whether the new plan should have a Gypsy/Traveller site policy

Other potential issues for Proposed Plan are the rationalisation/consolidation of policies.

## **Town Centres and Retailing (Chapter 7)**

### **Policy Context**

In response to the impact of the recession, along with changes to people's shopping habits, the Scottish Government established the National Review of Town Centres External Advisory Group in 2012 to consider and propose action to help restore town centres. The Group produced their report in July 2013, with the key principle being the need for a town centres first policy. The Scottish Government responded to the Report in November 2013 with the Town Centre Action Plan. This committed to the introduction of a town centre first policy, which was introduced in revised Scottish Planning Policy (SPP) in 2014.

Scottish Planning Policy directs development plans to identify a network of centres, and include a town centre first policy for footfall generating uses including retail and commercial leisure, offices, community and cultural facilities and where appropriate public buildings. A sequential approach should be taken and be applied flexibly and realistically to direct development to the most appropriate locations. Plans should assess how centres can accommodate development and identify opportunities for this as well as considering promoting residential use within town centres where appropriate. Policies should be introduced to encourage a mix of uses to support vibrancy, vitality and viability throughout the day and into the evening, and where necessary to limit clustering of uses. Town centre health checks should be undertaken with community planning partners, businesses, and community groups as appropriate and used to develop town centre strategies, the spatial elements of which should be included in the LDP.

The Proposed Clydeplan Strategic Development Plan identifies a network of Strategic Centres, including Greenock. Glasgow City Centre sits at the top of the network as its diverse range of core functions sets it apart from the other strategic centres. Greenock is identified as a town centre with retail, civic, leisure, community, employment, business and residential roles and functions. The challenges identified for Greenock are to address the effects of declining population and to improve the quality of the environment and to strengthen the retail role to take account of changing shopper habits and patterns. Future actions are to continue to improve the public realm and retail offer, including the complementary role of Port Glasgow and investigate the actions needed to undertake a health check for the town centre.

The Proposed Strategic Development Plan directs local development plans to: protect and enhance the development of the network of centres in line with their role and function, challenges and future actions; protect and enhance the long term health of Glasgow City Centre and ensure there is no detrimental impact on its role and function and; recognise that proposals for strategic scale development are subject to the sequential approach, and that impact on other Strategic Centres in the network should be assessed to ensure there is no detrimental impact on their role and function.

Town centre design Charrettes have also been carried out for Port Glasgow and Greenock town centres. These have identified a number of projects which will be reflected in the new Local Development Plan.

## Changes on the Ground

The main development in Port Glasgow has been at the Waterfront West site, which is due to be complete by the end of 2017. This is made up approximately 20,000 square metres of floorspace in 11 units, providing an enhanced retail offer within the town centre. Sainsbury's Local opened in Gourock town centre in 2013.

The main developments in Greenock have been an Aldi on Patrick Street, which opened in 2014 and the demolition and rebuilding of LIDL at Customhouse Way in 2016, which almost doubled its floorspace. There has also been an addition to the town centre floorspace through the conversion of the former Devol industrial units in the Clarence Street area to a mix of uses including offices, a blacksmiths, a gym and a bathroom showroom in 2016.

As well as new retail developments, there have also been a number of environmental and other improvements in the town centres. Entrance points to the three town centres have undergone public realm improvements including new signage and public art. New shopfronts have been installed in a number of areas and more improvements have been identified through Riverside Inverclyde's Inverclyde Town Centre Environmental Improvement Report. Riverside Inverclyde are also progressing a number of projects within the town centres, such as the redevelopment of Gourock Municipal Buildings, Greenock Custom House and Scarlow House in Port Glasgow as offices, all of which were completed in 2016. New car parks have been introduced in all three centres, along with a new parking strategy in Greenock and Gourock town centres, and a new relief road and one-way system in Gourock, to help alleviate on-street parking and congestion.

A design charrette was held for Port Glasgow town centre in 2014 and for Greenock town centre in 2016.

## Policy Review

**Policy TCR1** identifies a Network of Centres

This is not required as a stand-alone policy.

**Policy TCR2** sets out how the sequential approach is to be applied in Inverclyde

A sequential approach policy offering greater clarity on how and where it is to be applied will be required.

**Policy TCR3** sets out what uses are considered to be town centre uses

This could be merged with policies TCR1 and TCR2.

**Policy TCR4** sets out restriction on non-retail uses in the retail core of Greenock town centre.

This policy is being considered by Main Issue 5

**Policy TCR5** sets out what uses are suitable in the different character areas of the Greenock Town Centre: Outer Area

This policy is being considered by Main Issue 5

**Policy TCR6** identifies Town Centre/Retail Development Opportunities

It may be possible to incorporate this policy into another policy rather than have as stand-alone.

**Policy TCR7** sets out criteria for assessing proposals for town centre uses

This could be incorporated into the new policy covering policies TCR1-3.

**Policy TCR8** sets out circumstances when conditions will be applied

This policy is not required.

**TCR9** supports residential use above commercial properties

This is not required as a stand-alone policy.

**TCR10** sets out circumstances where shopping facilities to meet local needs will be supported.

The intent of this policy will be incorporated into a new retail policy framework.

**TCR11** sets out circumstances where retailing will be supported as an ancillary use

This policy is not considered to be necessary.

**TCR12** sets out a commitment to draw up a Greenock Town Centre Action Plan

This is not a policy and is not required.

#### Issues for new Plan

The Main Issues Report should consider the following:

- whether the policy framework for non-retail uses in the retail core of Greenock town centre is appropriate.

An issues for the Proposed Plan is the rationalisation/consolidation of the town centre/retail development policy framework.

### **Natural Heritage and Environmental Resources (Chapter 8)**

#### Policy Context

National Planning Framework 3 highlights the environment as a national asset providing opportunities for leisure and recreation as well as economic activity. It is the role of planning to protect, enhance and promote access to environmental resources for their sustainable use.

The role of planning, outlined in Scottish Planning Policy is to protect, enhance and promote the environment in relation to the distinctive landscape character, species and habitats, water, soils, woodlands and biodiversity.

An additional piece of legislation with implications for the natural environment is the Community Empowerment (Scotland) Act 2015 which requires planning to provide allotments through the safeguarding of existing and potential allotments in the Local Development Plan, where there is a proven demand, as well as encouraging opportunities for a range of community growing spaces.

National Planning Framework 3 aims to significantly enhance green infrastructure networks particularly in and around towns and cities. As well as improving the quality of spaces and places and building stronger, healthier communities, green infrastructure is now seen as an essential part of long-term climate resilience.

Scottish Planning Policy charges planning with the responsibility for protecting, enhancing and promoting the green infrastructure, as an integral component of successful placemaking.

### Changes on the Ground

- Works have been completed on interpretation for the Heritage Trail along the Inverclyde coastline
- The Council is working in partnership with the Inverclyde Pollinator Corridor project to develop mini wild flower meadows throughout Inverclyde, in order to provide much needed habitat for bees and butterflies.
- Central Scotland Green Network Trust have carried out a study at Coves Local Nature Reserve on future use and maintenance
- Green Network indicators have been produced for the Single Outcome Agreement process
- Green Network opportunities mapping has been produced identifying areas of deficit at Upper Greenock, East Greenock and Port Glasgow
- A landscape assessment has been carried out by Scottish Natural Heritage on West Renfrew Hills Regional Scenic Area with a view to designating it as a Local Landscape Area
- The Council completed an open space audit in 2015, which assessed the distribution and quality of the open spaces identified in the Local Development Plan. The audit will inform the preparation of the next Local Development Plan and contribute to the development of an Inverclyde Green Indicator by Glasgow and Clyde Valley Green Network Partnership.
- SEPA has published the second River Basin Management Plan for the Scotland River Basin District 2015-2027. No significant actions were identified for identified water bodies in Inverclyde.

### Policy Review

**Policy ENV1** protects international, national, strategic and local designated environmental resources.

Rewording of section (b) is required to assess proposals relating to Clyde Muirshiel Regional Park prior to deciding whether they have an adverse effect. Otherwise it is still valid and relevant.

**Policy ENV2** assesses development proposals in the Green Belt and Countryside.

A wording change is required to clarify the application of the policy to Green Belt and Countryside.

**Policy ENV3** safeguards and promotes the enhancement of the Green Network.

This policy could be combined with Policies ENV4 and ENV5 covering open space which is part of the green network. It also needs to be amended to incorporate the wider green infrastructure and to remove sections (a) – (e) which are proposals rather than policy.

**Policy ENV4** safeguards and promotes the enhancement of open space.

This policy could be combined with Policy ENV3.

**Policy ENV5** secures open space through Planning Agreements.

This policy could be combined with policy ENV3 or delete and enforce through Development Management procedures.

**Policy ENV6** safeguards trees, groups of trees and woodland designated as TPOs.

A policy protecting important trees will feature in the new Plan.

**Policy ENV7** protects and enhances biodiversity.

The reference to the production of the LBAP should be removed as it is a proposal and not a policy. Include reference to geo-diversity given the link between the two.

**Policy ENV8** protects water quality and the water related environment.

The policy remains valid and should be retained, subject to the following amendments:

- reference made to the River Basin Management Plan 2015-2020.
- addition of a criterion requiring buffer strips along watercourses within development sites.
- minor re-wording/restructuring to aid clarity.

### Issues for the new Plan

Main Issue 20 relates to a new policy for allotments and community growing areas.

Other potential changes for inclusion in the Proposed Plan are:

- The inclusion of West Renfrew Hills as a Local Landscape Area, following completion of the Statement of Importance.
- The re-naming of Sites of Importance for Nature Conservation (SINCs) to Local Nature Conservation Sites (LNCSs)
- The inclusion of a geo-diversity element to the biodiversity policy due to its value as a basis for habitats for biodiversity

## **Built Heritage and Townscape (Chapter 9)**

### Policy Context

National Planning Framework 3 recognises the important role that cultural heritage plays in the economy, cultural identity and quality of life.



Scottish Planning Policy (2014) emphasises the importance of the historic environment as a cultural and economic asset and a source of inspiration which is integral to creating successful places that appeal to visitors. The principles stated in Scottish Planning Policy of promoting the care and protection of the designated and non-designated historic environment and enabling positive change are already enshrined in the LDP.

### Changes on the Ground

- Three new conservation areas were designated in 2015 bringing the total in Inverclyde to 8. The new conservation areas are Kempock St/Shore St, Gourock, West Bay, Gourock and The Cross, Kilmacolm
- The Inverkip Conservation Area boundary was amended in 2015 to remove three properties
- A Conservation Area Appraisal was produced for Greenock West End Conservation Area in 2016.
- One building has been added to the Buildings at Risk Register - the Ancillary Buildings at the Cloch Lighthouse, Gourock whilst three have been removed having been renovated. These are the former Greenock Burgh Police Station on Dalrymple Street, Greenock, and Den o'Gryffe and Kilmacolm Old Primary School, both Kilmacolm. A further property, the former St George's North Church on St George's Square, Greenock, has restoration in progress
- A number of additions, removals and modifications have been made to the Listed Buildings records resulting in an overall increase from 244 to 247 listings. There are 25 in Category A, 131 in Category B and 91 in Category C.
- The boundaries of two Gardens and Designed Landscapes at Ardgowan Estate, Inverkip and Finlaystone Estate, Port Glasgow have been redrawn by Historic Environment Scotland to correct mapping discrepancies.

### Policy Review

**Policy HER1** addresses development which affects the character of conservation areas.

**Policy HER2** addresses demolition in the conservation.

Both these policies remain relevant and valid.

**Policy HER3** promotes the designation of three new conservation areas.

These conservation areas have been designated so the policy is no longer required as Policy HER1 (or its equivalent will apply).

**Policy HER4** presumes against the alteration, extension or demolition of listed buildings.

Reference to 'demolish' should be revised as demolition would not 'respect the reasons for listing' or 'be of a high standard'.

**Policy HER5** safeguards the setting of listed buildings.

This policy remains valid and relevant.

**Policy HER6** relates to proposals for enabling development to support the restoration of listed buildings.

The reference to the Supplementary Guidance requires updating otherwise this Policy remains valid and relevant.

**Policy HER7** addresses development affecting archaeological sites.

The section relating to conditions on applications should be removed as this will be dealt with through the Development Management process. Otherwise the Policy remains valid and relevant.

**Policy HER8** addresses development affecting sites on the Inventory of Gardens and Designed Landscapes. Removal of the word 'normally' may be required for clarity. Otherwise it remains valid and relevant.

#### Issues for the new Plan

There are no Main Issues. For the Proposed Plan a consolidation and rationalisation of the policies could be considered.

### **Energy Planning and Service Infrastructure (Chapter 10)**

#### Policy Context

National Planning Framework 3 emphasises the need for planning to facilitate the transition to a low carbon economy through the development of technologies to help reduce greenhouse gas emissions. The extension of heat networks in cities and towns is a priority towards achieving this.

Scottish Planning Policy 2014 supports this transition through the development of a diverse range of renewable energy technologies and the development of heat networks as well as measures to improve energy efficiency. Local Development Plans are expected to support the development of heat networks in as many locations as possible and incorporate heat mapping as a means of identifying potential for locating developments with high heat demand alongside sources of heat supply.

For onshore wind energy Scottish Planning Policy introduces a new Spatial Framework identifying those areas likely to be most appropriate for wind farms; dividing areas into areas where wind energy development will not be acceptable, where there is a need for significant protection and where it is likely to be acceptable subject to consideration against policy criteria.

National Planning Framework 3 supports a catchment-scale approach to sustainable flood risk management. The spatial strategy aims to build the resilience of our cities and towns, encourage sustainable land management in our rural areas, and to address the long-term vulnerability of parts of our coasts and islands. National Planning Framework 3 reflects Scotland's Zero Waste policy, which seeks to promote re-use and minimise waste.

Scottish Planning Policy states that the planning system should promote a precautionary approach to flood risk from all sources, locate development away from functional flood plains and medium to high risk areas; and undertake natural and

structural flood management measures, where necessary. In addition, Scottish Planning Policy includes a requirement for SuDS to avoid increased surface water flooding. Significant changes include a requirement for Local Development Plans to identify and address significant cross-boundary flooding issues and protect land with the potential to aid the management of flood risk. A presumption against landraising is also introduced. Following the Flood Risk Management Act (2009), a Flood Risk Management Strategy (2015) and a Flood Risk Management Plan (2016) were adopted for the Clyde and Loch Lomond Area. These documents identify areas of flood risk, called Potentially Vulnerable Areas, and set out a series of actions to prevent and tackle flooding. The changes in Scottish Planning Policy and actions identified in the Flood Risk Management Strategy and Plan will require to be reflected in the next Local Development Plan.

A greater emphasis is placed on Zero Waste and Energy from Waste, seeing waste as an opportunity rather than a burden.

National Planning Framework 3 highlights the importance of digital infrastructure across towns and cities and for economic and social networks. SPP identifies the role of planning in providing the required digital infrastructure through development and with minimal environmental impact.

### Changes on the Ground

- Three wind turbines have been constructed and a further 14 have planning permission.
- The Supplementary Guidance on Renewable Energy which was produced with the 2014 Local Development Plan was updated in 2015 to incorporate the Spatial Framework for wind energy developments which was introduced in the SPP.
- A Landscape Capacity Study for Wind Turbine Development was prepared in 2014 to assist with determination of wind energy applications.
- Four applications have been granted for domestic solar panels.
- A biomass and gas district heating system has been installed in River Clyde Homes properties in Broomhill, Greenock at a cost of £7m, providing low cost heating and hot water to 555 homes.
- Inverclyde Council is progressing with its Greenock Flood Prevention Scheme. Completed works include a replacement culvert at Drumfrochar Rd, flow control at Aberfoyle Rd, attenuation at Kings Glen and additional capacity at West Station.
- The Council has continued to roll out its food collection and kerbside glass collection services, while also introducing recycling services to tenemental properties.
- The Central Greenock Flood Prevention Project is progressing. Phase 3 at West Station is currently under construction and due to be completed this financial year. Alternative arrangements for the Carts Burn at Crescent Street are also progressing, with further investigations regarding increased attenuation at Whinhill Reservoir and utilising the old Eastern Line of Falls. Design of the various Flood Risk Management Plan Schemes outwith Central Greenock is also progressing, with completion of the design stage anticipated toward the middle/end of 2017.

### Policy Review

**Policy INF1** outlines the means by which renewable energy developments will be directed to the appropriate locations.

This Policy requires to be updated to incorporate the Spatial Framework for onshore wind energy introduced in the SPP.

**Policy INF2** supports energy efficiency in new build developments.

The inclusion of this policy may be reviewed subject to guidance provided by the Scottish Government.

**Policy INF3** – sets out the criteria for assessing proposals for new waste management facilities.

This policy remains valid and should be retained, subject to the following amendments:

- new criteria which safeguards existing waste management facilities, ensure that development on adjacent land does not compromise the waste handling operations, and directs new developments to business and industrial areas,
- a new section/criteria promoting resource efficiency and the minimisation of waste during the construction and operation phases of new developments.

**Policy INF4** – seeks to reduce the risk and impacts of flooding.

The policy remains valid and should be retained, subject to the following amendments:

- refer to ‘significant flood risk’ (i.e. medium to high)
- with regard to exceptions, reference should be made to the Flood Risk Framework.
- state that development on the functional floodplain will be avoided.
- refer to the Council's new Planning Guidance on Flood Risk Assessment and Drainage Impact Assessment.
- to align with the above guidance, require an FRA for residential developments of more than 5 dwellings, industrial or commercial developments of more than 250m<sup>2</sup>, or any development identified by Inverclyde Council to be in a sensitive location.
- offer broad support for the actions in the new Flood Risk Management Plan for Clyde and Loch Lomond Area.
- rewording/restructuring to aid clarity.

**Policy INF5** supports Sustainable Drainage Systems

This policy remains valid and should be retained, subject to the following changes:

- expand to cover surface water and waste water drainage
- refer to the Council's Planning Guidance on Flood Risk Assessment and Drainage Impact Assessment, and require proposals to comply with it.
- To align with the above guidance, require a Drainage Impact Assessment (DIA) to be submitted for residential developments of more than 5 dwellings, industrial/commercial developments of more than 250m, or any development identified by Inverclyde Council to be in a sensitive location.

**Policy INF6** addresses the location of electronic communication infrastructure

As this Policy refers only to telecommunications, it requires to be updated to include digital connectivity, with appropriate criteria.

**Policy INF7** outlines the means by which mineral extraction will be directed to the appropriate locations.

As there are no minerals sites in Inverclyde, this Policy has not been relevant but does remain valid for any future proposals.

#### Issues for new Plan

The Main Issues Report should consider the following:

- A new policy is required addressing Heat Networks with potential Supplementary Guidance to follow, as indicated by the Scottish Government.

Other potential changes for inclusion in the Proposed Plan are:

- Policy changes as identified above.