

**INVERCLYDE LOCAL DEVELOPMENT PLAN  
PROPOSED PLAN**

**SCHEDULE 4s**

**BACKGROUND PAPER TO REPORT TO  
ENVIRONMENT & REGENERATION COMMITTEE  
25 OCTOBER 2018**

Issue 1	Creating Successful Places	
Development plan reference:	Section 3.0, Pages 6-10	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Lunar Greenock S.a.r.l. (29) SEPA (93) Robert Buirds for The Campaign to Save Inchgreen Dry Dock (152) Scottish Prison Service (156) Garvel Clyde Ltd (157) Stuart McMillan MSP (286) McInally Associates for Peel Land and Property (343) Lochailort Investments Ltd (350) McInally Associates for Clydeport Operations Ltd (351) Wilson Dunlop for The Campaign to Save Inchgreen Dry Dock (359) A Freel (367) T Miller (368) Maureen Cockburn (370) John Freel (371) Jean Mackinnon (372) Wardrop Strategic Planning Ltd for Taylor Wimpey (West Scotland) Ltd (401) Persimmon Homes Ltd (417) Woodland Trust Scotland Ltd (460) CBRE Ltd for Sanmina SCI (472) Port Glasgow West Community Council (492) West College Scotland (494) Macdonald Wilson(551) Councillor Christopher Curley (559) Councillor David Wilson (560) Councillor Innes Nelson (562)</p>		
Provision of the development plan to which the issue relates:	Creating Successful Places (Policy 1), Priority Projects (Policy 2), Priority Places (Policy 3)	
Planning authority's summary of the representation(s):		
<p><u>Lunar Greenock S.a.r.l. (29)</u></p> <ul style="list-style-type: none"><li>Greenock Ocean Terminal Priority Project is an important site in relation to Greenock town centre and the wider town. Critical that a positive development framework continues to be established. It is necessary to ensure that the site does compete or draw trade away from the traditional Greenock town centre, particularly the Oak Mall. Council should encourage a plan-led approach to master-planning the site that involves businesses and owners in the town centre, and guards against retail development.</li><li>Support the strategic sites in the Plan (Priority Places), but Plan should set out in more detail how the opportunities will interact with Greenock town centre, so as to ensure</li></ul>		

they do not impact negatively, particularly Class 1 and Class 3 uses at The Harbours and James Watt Dock/Garvel Island.

#### SEPA (93)

- Support inclusion of “Resource Efficient” as a factor contributing to successful places, particularly references to LZCGT, heat and waste
- City Deal projects must be assessed against the detailed policies of the Plan. SEPA expect to be consulted on individual proposals.
- Explicit link to Supplementary Guidance is welcomed.

#### The Campaign to Save Inchgreen Dry Dock - Robert Buirds (152) & Wilson Dunlop (359)

- Housing development around Garvel Island and the Great Harbour will hinder and obstruct business operations. Discussions should have taken place with existing businesses to develop an industrial strategy for this area. The LDP should not include proposals for housing development around Garvel Island, the Great Harbour and James Watt Dock.

#### Scottish Prison Service (156)

- SPS has planning permission in principle for a new prison on the former Greenock High School site (part of Spango Valley Priority Place). This is reflected in the Proposed Plan and Supplementary Guidance, which is supported, but reference to the prison should be ‘Use Class 8a: Secure Residential Institution’.

#### Garvel Clyde Ltd (157)

- Concerned about the impact of existing and proposed houses on industrial operations at Inchgreen and Garvel Island.

#### Stuart McMillan MSP (286)

- Development of 670 houses at Inverkip Power Station, with limited services, highlights a complete lack of vision. It would create a satellite outpost of Inverkip, causing additional traffic, congestion and air pollution. Improved rail services/ bus services, car parking, park and ride and improved connectivity required. The site should be used for a different purpose, for example a marine tourism holiday park or for a film studio.
- A park and ride facility should be introduced at Spango Valley, Greenock. Possible film studio location.
- The location of the Ocean Terminal cruise liner facility has raised concerns that traders on West Blackhall Street will miss out on passing trade. This should be investigated before public realm proposals are progressed.
- Concerns about the viability of the Inchgreen (Greenock) City Deal project. Inchgreen needs to be brought back into use. The dry dock is of national importance.
- Conditional support for housing development at James Watt Dock (East). (assumed R15)
- Not convinced 900 houses will be built at James Watt Dock/Garvel Island in near future.
- Objection to housing development at Victoria/East India Harbours (The Harbours, Greenock). The building of 240 flats will close off this area to the Inverclyde public, and impact on views. The Greenock charrette stressed the best thing for the town was to

open up ways between the water and the town centre.

McInally Associates for Peel Land and Property (343)

- Support the identification of The Harbours, Greenock as a Priority Place for the mix of uses listed in the Plan. Site was granted outline planning consent for housing led mixed use development in 2006. The inclusion of a residential development opportunity (R33) on the site is welcomed. Tourism designation on the site is welcomed.
- Support the identification of James Watt Dock, Greenock as a Priority Place for the mix of uses listed in the Plan. Planning consent was obtained in 2010 including the approval of a mixed use development masterplan. Infrastructure and public realm works have been undertaken and planning permission for residential development has been granted. The inclusion of residential development opportunities (R15 & R16) on the site is welcomed. The boundary between these two opportunities should be highlighted on the Proposals Map. Support tourism uses on the site. The site should be listed as a Business and Industrial Development Opportunity in the Plan.

Lochailort Investments Ltd (350)

- Welcome the identification of Spango Valley, Greenock for private residential development. The mix of other uses identified in the Plan is not deliverable. There is no interest in the site for commercial use. No more than 6ha should be reserved for commercial use, as a 'reserve allocation'. The site is ideally suited for residential-led redevelopment with ancillary uses. Any educational requirement should be met on the former Greenock High School site. The site should be allocated for approximately 1200 dwellings and associated ancillary uses. The requirement for an overall strategic masterplan should not preclude individual development parcels from coming forward.

McInally Associates for Clydeport Operations Ltd (351)

- Support for Ocean Container Terminal as a business/industrial area and Priority Project, and for reference under tourism section. Plan should be stronger in safeguarding Ocean Terminal as a tourism location. Tourist facilities and infrastructure related to Greenock Ocean Terminal must be enhanced and improved.
- Support for designation of Inchgreen, Greenock as a City Deal Priority Project.

A Freel (367), T Miller (368), Maureen Cockburn (369), E McLellan (370), John Freel (371), Jean MacKinnon (372)

- Objection to housing development at Garvel Island, James Watt Dock and the Great Harbour. This would put paid to any hopes of re-establishing shipbuilding which must be a priority for Inverclyde.

Wardrop Strategic Planning Ltd for Taylor Wimpey (West Scotland) Ltd (401)

- Agree that the six qualities of a successful place is the cornerstone to ensuring all new development makes a positive impact.

Persimmon Homes Ltd (417)

- Support Spango Valley, Greenock for housing development, and its allocation as a

Priority Place and increased housing capacity.

Woodland Trust Scotland Ltd (460)

- Welcome that the retention of distinct natural features and the avoidance of conflict between land uses are included as criteria. Want ancient woodland protected from the negative impacts of development. (Comment made in support of changes to Policy 34 covered in Issue 13).
- For Inverkip Power Station, include a 50m buffer zone of new native woodland to help mitigate damage to adjoining ancient woodland.
- For Woodhall, eastern part of site is ancient woodland, development of which is unacceptable. Site allocation boundaries should be reviewed. Woodland should be managed as an important habitat and as accessible woodland. Ancient woodland should be covered by a TPO.
- For Spango Valley, Greenock, adjoining native woodland sites could be connected through additional planting to provide increased habitat and enhance landscaping of proposals.

CBRE Ltd for Sanmina SCI (472)

- Supportive of the mix of uses for Spango Valley, Greenock. However, the plan should not allocate specific percentages to land uses as this reduces flexibility. The balance of land uses can be managed through a masterplan process. Specific allocation of former school site for prison use is overly restrictive. Support allocation as Business/Industrial Opportunity and within Network of Centres.

Port Glasgow West Community Council (492)

- Why consider blocking off views of river across Victoria/East India Harbours (The Harbours, Greenock) by housing development?

West College Scotland (494)

- Following an options appraisal, West College Scotland has a preferred option to relocate its Greenock campus to East India Dock at Greenock Waterfront. The Harbours should include a reference to Class 10 (non-residential institutions) within its preferred strategy in Schedule 2. An education use would be entirely appropriate at The Harbours as part of mixed use development, and in relation to relationship to the town centre and excellent public transport accessibility. Justification for this use is made by way of reference to the Beacon Arts centre also being at The Harbours. There has been little interest in housing development at The Harbours and the capacity of the housing site here (R33) should be reduced to 100.
- The Plan would benefit from greater clarity regarding the relationship between Priority Projects and Priority Places.

Macdonald Wilson (551)

- Look at ways of making Inverclyde more attractive to live. Try to attract investment for major leisure facilities and improve transport (trains). Don't just build houses. Look at Largs, people visit there.

Councillor Christopher Curley (559)

- Inconsistency between Plan and Priority Places SG as the former does not refer to housing as a predominant use on James Watt Dock/Garvel Island. Concerned that proposed housing next to the graving dock would restrict the operation of the dock. Strategy for the area should be predicated on safeguarding the current dry dock facility.

Councillor David Wilson (560)

- City Deal Priority Projects are going nowhere, apart from Ocean Terminal. Require to look elsewhere (Spango Valley, Port Glasgow Industrial Estate, James Watt Dock) and put together a substantially larger project team.

Councillor John Crowther (561)

- There appears little scope in the Plan to accommodate the growth of Ferguson Marine re dry dock facilities. Scott's Dry Dock/Victoria Harbour could accommodate such facilities or James Watt Dock/Garvel Island as an alternative.

Councillor Innes Nelson (562)

- Object to change of use from industrial to mixed use at Spango Valley, Greenock and strongly object to housing being proposed for the site. Reasons include: A78 overcapacity; site access roads are not adequate; impact on farming activity; satellite location, not served by schools or shops; loss of industrial opportunity; subsidence risk; flood risk; impact on existing uses; all or part of site should be returned to green belt.

**Modifications sought by those submitting representations:**

- Plan should set out in more detail how Priority Projects/Places will interact with town centres so that they do not impact negatively on town centres. (29)
- Remove proposals for housing development from James Watt Dock/Garvel Island (and Great Harbour). (152), (359), (367), (368), (369), (370), (371), (372)
- Schedule 2, under Spango Valley, should be amended to refer to 'secure' residential institutions. (156)
- Land around the water's edge should be allocated for industrial use, not housing. (157)
- Inverkip Power Station should be allocated for economic development uses. (286)
- A park and ride facility should be included at Spango Valley. (286)
- Housing development opportunity at The Harbours, Greenock should be removed (286)
- Boundary between housing development opportunities R15 and R16 should be highlighted on the Proposals Map. (343)
- Include James Watt Dock as a Business and Industrial Opportunity in Schedule 9 of the Plan. (343)
- Identify Spango Valley, Greenock for residential-led redevelopment with a capacity for 1200 dwellings. (350)
- Amend Policy 25 reference to Greenock Ocean Terminal to read:  
"Greenock Ocean Terminal (25(c) on the Proposals Map) is safeguarded for freight transport and cruise liner activity (*for the avoidance of doubt this includes allowing for appropriate tourism related developments/facilities*)".

- For Inverkip Power Station, include site specific developer requirements to protect the ancient woodland through the creation of a native woodland buffer of at least 50m. (460)
- For Woodhall, Port Glasgow, remove housing development opportunity allocation or review boundaries to exclude ancient woodland. Include following developer requirements:
  - the ancient woodland can be enhanced and managed as a valuable greenspace for those living in the area;
  - the ancient woodland should be protected from any negative impacts of development;
  - a buffer area of additional planting and/or greenspace can be created to protect the ancient woodland from the potential negative edge effects of the proposed development; and
  - ancient woodland should be covered by a TPO. (460)
- For Spango Valley, include a developer requirement to connect woodland on site through additional native planting. (460)
- Replace current wording for Spango Valley, Greenock in Schedule 2 with:
 

“Mixed use development including business, industrial, storage or distribution, housing, residential institutions, non-residential institutions, neighbourhood retail, neighbourhood food and drink, appropriate leisure and recreation, and appropriate renewable energy uses.” (472)
- Include Education as a supported land use in Schedule 2 as it refers to The Harbours (494)
- Reduce capacity of housing development opportunity R33 (The Harbours, Greenock) to 100. (494)
- Schedule 2 statement for James Watt Dock/Garvel Island be amended at the end to include:
 

“Any development of the site shall safeguard the current graving dock for maritime and ship repair uses.”

(Suggestions of changes to Priority Places SG also made)(559)
- Identify opportunity for dry dock facilities at Scott’s Dry Dock/Victoria Harbour (The Harbours) or James Watt Dock/Garvel Island. (561)
- Remove housing as a suitable use for Spango Valley and return all or part of the site to green belt. (562)

### **Summary of responses (including reasons) by planning authority:**

#### Policy 1 – Creating Successful Places (93, 401, 460)

- Support for Policy 1 is noted.

#### Attractiveness of Inverclyde (551)

- The aim of the Plan is to contribute towards Inverclyde being an attractive place to live, work, study, visit and invest. The Plan sets out a development framework and identifies development opportunities to encourage a mix of different uses in Inverclyde, not just housing. Train connectivity between Inverclyde and Glasgow is considered to be good. Inverclyde has 14 rail stations and up to 5 services per hour each way. It is not considered that any modification to the Plan is required in relation to this matter.



### Greenock Ocean Terminal (29)

- A planning application has been submitted for a dedicated cruise ship terminal and visitor centre on Greenock waterfront (Production). This will enable the separation of cruise ship facilities and container handling operations. The latter will remain concentrated on the area covered by Policy 25(c) (see correction in Issue 14), whilst cruise ship land facilities will be located on a site within Greenock town centre, to the immediate west of the bingo hall and cinema. The planned completion date for the new facility is Spring/Summer 2020. The proposal includes tourist reception facilities, a visitor centre, an art gallery and restaurant. There are no retail facilities proposed that would draw trade from the town centre. It is anticipated that the facility will draw domestic visitors to Inverclyde, which will benefit the town centre. It is considered that the Plan's support for the cruise liner facilities, and the proposed location within the town centre, offers sufficient support for tourism related development at this location.
- To complement the Ocean Terminal investment, local Urban Regeneration Company Riverside Inverclyde area leading a public realm investment which will focus on West Blackhall Street and a route leading from the new visitor centre to Greenock town centre central area. For West Blackhall Street, the aim will be to create a shared space, which is more pedestrian friendly whilst making vehicle movements on the street simpler and retaining on-street car parking. Event space will also be created. Project design is being led by Ironside Farrar and implementation is scheduled for 2019/20. The project steering group includes traders from West Blackhall Street. Through this project, the Council hopes to make West Blackhall Street a more attractive place to visit, and allay concerns about the diversion of cruise ship visitors from the street. It is not considered that any modification to the Plan is required in relation to this matter.

### Priority Places/Priority Projects - general (29, 494)

- Through Policy 22, the Plan sets out a positive framework for Inverclyde's town and local centres. This includes a sequential test approach and a Network of Centres Strategy which identifies Greenock and then Gourock and Port Glasgow town centres as the preferred location for new retail development over 1,000 square metres. For areas outwith town and local centres, the Network of Centres Strategy restricts town centre uses to no more than 250 square metres in total.
- The Council considers the difference between Priority Projects and Priority Places to be clear. Priority Projects are major investments by the Council over the lifetime of the Plan in the economy, infrastructure, housing and communities of Inverclyde, which have land use implications. In some instances e.g. City Deal projects, the location of the investment is in a single defined location, for others e.g. affordable housing supply and early learning and childcare, the investment will be in a number of locations, not all of which are yet identified, but the Plan offers support in principle to these investments. Priority Places are larger scale, location-specific, development opportunities, the majority of which are not Council-led. It is not considered that any modification to the Plan is required in relation to this matter.

### City Deal Projects (93)

- All City Deal projects will be assessed against the relevant policies of the Plan at the planning application stage, and statutory consultations, including with SEPA, will be



undertaken.

- The current status of the Inverclyde City Deal projects is as follows:  
Greenock Ocean Terminal – planning application submitted for dedicated cruise ship facility. See above for detail.  
Inverkip infrastructure –  
Inchreen, Greenock –
- As the City Deal is a partnership project with the seven other Glasgow City Region authorities, it is not within Inverclyde Council's powers to switch City Deal funding to another Inverclyde project. All City Deal projects were chosen after a detailed assessment and scoring exercise, and should any particular project be removed, it does not follow that funding would become available for another project in the same authority area. It is not considered that any modification to the Plan is required in relation to this matter.

#### The Harbours, Greenock (286, 343, 492, 494, 561)

- A residential-led redevelopment of The Harbours is a key element of the approved masterplan for the area (Production X), in which the retention of views and full and unhindered pedestrian/cycle access to the waterfront are key design considerations. These would be a requirement of any detailed planning applications for the site. It is not accepted that residential development would close off this area from the public. The correct mix of uses, including residential, will bring activity and security to the site. The housing capacity assigned to the site is in line with the approved masterplan proposals and is indicative. The actual site capacity will be determined by a design-led approach. The introduction of an educational/non-residential institution use to the site would likely involve a significant land-take, which would impact on the preferred residential-led development strategy for the site. It is not considered that any modification to the Plan should be made in relation to the preferred strategy for the Harbours.
- The Council suggest the reference to 'marine-based business uses' in Schedule 2 be amended to 'marine-related business and industrial uses' for clarification purposes. The Harbours site is large and still contains operating maritime uses. It is considered that such uses can continue to be accommodated without prejudice to the overall masterplan.

#### James Watt Dock/Garvel Island (including Great Harbour), Greenock (152, 157, 286, 343, 367, 368, 369, 370, 371, 372, 559, 561)

- The Plan reflects the approved masterplan for the James Watt Dock/Garvel Island area (Production). This provides for residential development on much of the unused parts of the site, whilst retaining currently operational areas for business and industry such as the Garvel Dry Dock, as illustrated in Diagram 2 of the Priority Places Supplementary Guidance. The Council remains of the view that residential development offers the best opportunity of bringing these brownfield sites back into positive use to create a new and unique neighbourhood in Inverclyde, which can contribute to the repopulation priority. The impact of residential development on industrial uses and vice versa can be managed at the application stage through the development management process.
- As for all the Priority Places, the detailed land use strategy is set out in the Priority Places Supplementary Guidance. This document clearly distinguishes the difference between sites R15 and R16. It is not accepted there is an inconsistency between the

Plan and the Supplementary Guidance. Whilst the Plan simply lists the uses that will be acceptable in the James Watt Dock/Garvel Island area, the Supplementary Guidance reflects the balance of uses in the masterplan, in which housing is the predominant use.

- Schedule 9 of the Plan includes a list of site specific Business and Industrial development opportunities, which are clearly identifiable on the Plan. Whilst it is accepted that James Watt Dock/Garvel Island does have potential for business and industrial development, the opportunities are not clearly identifiable and may come about through refinement of the masterplan or the planning application process. However, the Council accepts there are existing business/ industrial uses on the site, which may want to expand, or new businesses may wish to locate there, and also that the current adopted Local Development Plan identifies an indicative business/industrial opportunity at this location. The Council therefore has no objection to James Watt Dock/Garvel Island being included in Schedule 9 as an indicative opportunity as follows:

E9 - James Watt Dock/Garvel Island - Indicative - Class 4, 5 and 6 - See Priority Places Supplementary Guidance (and consequential renumbering of subsequent development opportunities).

- It is accepted that existing and potential maritime-related business and industrial uses are not sufficiently reflected in the Plan and Supplementary Guidance. The Reporter is invited to change the reference to 'maritime-based commercial enterprises' in Schedule 2 to 'marine-related business and industrial uses'. The Council will identify the Garvel Dry Dock, and any other relevant areas as Business and Industrial Areas in a revision of the Supplementary Guidance. This is considered to address the change to Schedule 2 requested by respondent 559.

#### Spango Valley, Greenock (156, 286, 350, 417, 460, 472, 562)

- The Council believes the mix of uses set out in the Plan for Spango Valley is correct for the site. Spango Valley has long been an important employment location within Inverclyde, and the Council believes it is important for it to remain so, and that it has the potential to continue this purpose. However, the Council also accepts that the scale of industrial use seen under the IBM use of the site, referring to both land-take and number of employees is unlikely to return, therefore it is important to introduce a mixed use designation for the site, including housing, to maximise investment in the site, and bring about its comprehensive redevelopment for the identified range of uses, including employment uses. The inclusion of percentage land uses are a means of achieving this.
- With regard to the objections to housing development:
  - Transport Scotland has indicated that there are no capacity issues on the A78 and that development proposals can be assessed on a site by site basis. This would consider both the volume of traffic and improvements required to improve site access, if required.
  - Neighbourhood retail, food and drink uses and leisure and recreation uses are listed as acceptable uses on the site, and would be expected to form part of a comprehensive masterplan for the site so as to minimise journeys from the site to such services.
  - Distance to schools from road access point to site: ND Secondary (Inverclyde Academy) - ; ND Primary (Aileymill - ; RC Secondary (Notre Dame) - ; RC Primary (?) –
  - It is considered that mixed use development offers the best prospect of encouraging employment uses to return to the site.

- Subsidence and flooding – these would be considerations at the masterplanning/planning application stage, with these matters addressed through avoidance of affected areas or technical solutions.
- Potential for neighbourhood nuisance – concerns noted, but the claim is conjecture, and ultimately not a planning matter.
- Return to green belt – the Council considers Spango Valley to be a brownfield opportunity that offers the potential for Inverclyde to address recognised priorities including repopulation, through new housing, and inequalities, through employment opportunities.

- The requirement for additional native planting is a matter that can be considered as part of the Supplementary Guidance on Priority Places.
- The Council recognise the intentions of the Scottish Prison Service to develop a new prison on the former Greenock High School part of the Spango Valley site and this is specifically referenced in the Plan. The Council is not opposed to the Reporter modifying the Plan to include reference to Secure Residential Institutions in addition to Residential Institutions in order to clarify this matter. Such a modification would be reflected in the Supplementary Guidance on Priority Places.
- The Council is not opposed to park and ride being added to the range of uses that the site is suitable for.

#### Inchgreen, Greenock (157, 286, 351)

- The Proposed Plan identifies an industrial future for Inchgreen through Policy 2/para 3.6 which identifies it as a Glasgow city-region City Deal to develop the site for industrial uses. Policy 25(b) promotes and safeguards the site for the manufacture and maintenance of renewables and the provision of specialist marine services (Note: the site is wrongly annotated as 25(a) on the Proposals Map, see Schedule 4 Issue No.14). Inchgreen is also identified in the Clydeplan Strategic Development Plan as part of the Inverclyde Waterfront Strategic Economic Investment Location. It is not considered that any modification to the Plan is required in relation to this matter.

#### Inverkip Power Station (286, 460)

- The planning strategy for Inverkip Power Station is based on a development framework (Production), which was submitted with a planning application in 2009 (undetermined). The strategy is residential led, with supporting uses including community facilities, neighbourhood retail and employment. Leisure and recreation, hotel, food and drink and public house uses are also identified to take advantage of the site's waterfront location and the opportunities this offers. The Council considers this strategy for the site to be the correct one. Discussions are ongoing with Scottish Power regarding the determining of this application/framework, which is considered to include a mix of uses which will lead to the delivery of development on the site. It will also create a unique residential environment within Inverclyde, attracting new residents to the area, supporting the Council's repopulation strategy. The provision of local services on the site, so as to minimise travel, will be a requirement of the development, as will good connectivity to services in Inverkip and Wemyss Bay, from which rail services to the Glasgow city-region are available.

- The requirement for a 50 metre buffer of new native planting is a matter that can be considered as part of the Supplementary Guidance on Priority Places.
- The Council considers its strategy for mixed use development of the Inverkip Power Station site, including residential, to be the correct one. It is not considered that any modification to the Plan is required in relation to this matter.

Woodhall, Port Glasgow (460)

- The protection of the ancient woodland is a matter that can be considered as part of the Supplementary Guidance on Priority Places. For this reason it is not considered necessary to remove the entire housing allocation from the Woodhall site, as the Supplementary Guidance can identify areas for housing development and woodland protection, and any appropriate buffer. The Local Development Plan is not the vehicle for identifying new Tree Preservation Orders; instead it reflects existing Tree Preservation Orders. It is not considered that any modification to the Plan is required in relation to this matter.

**Reporter's conclusions:**

**Reporter's recommendations:**

Issue 2	Tackling Climate Change	
Development plan reference:	Section 4.0, Pages 10-13	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Homes for Scotland (89) Scottish Environment Protection Agency (SEPA) (93) Stuart McMillan MSP (286) Scottish Government (411) Woodland Trust Scotland (460) Scottish Natural Heritage (SNH) (484)		
Provision of the development plan to which the issue relates:	Supplying Energy (Policy 4) Heat Networks (Policy 5) Low and Zero Carbon Generating Technology (Policy 6) Waste Reduction and Management (Policy 7) Managing Flood Risk (Policy 8) Surface and Waste Water Drainage (Policy 9)	
Planning authority's summary of the representation(s):		
<u>Homes for Scotland (89)</u> <ul style="list-style-type: none"><li>• Support for the broad nature of Policy 5 but concerns that the requirement to deliver heat networks in new developments could undermine their commercial viability.</li><li>• National policy on heat networks in new residential developments is confused at best and ignores revisions to Building Standards.</li><li>• The Scottish Government's objective for Energy Efficiency Ratings by 2040 places a greater focus on the large existing housing stock rather than new homes. It is highly unlikely that connecting new homes to low carbon heat sources would have a significant impact on carbon reduction targets.</li><li>• Support for retrofitting low carbon heat to existing housing stock.</li></ul> <u>Scottish Environment Protection Agency (SEPA) (93)</u> <ul style="list-style-type: none"><li>• Welcome inclusion of Policy 9 Surface and Waste Water Drainage and specific reference to sewer connections and the requirement for SuDs schemes.</li><li>• The provision of temporary/construction SuDs has not been addressed in Policy 9 – Surface and Waste Water Drainage. This requires to be modified.</li><li>• Policy 7 Waste Reduction and Management, criterion b) states that proposals for waste management facilities will be supported where they “are primarily required to cater for waste arising solely in Inverclyde”. While this does not restrict facilities to managing waste arising solely in Inverclyde, it can be difficult to provide or enforce through the planning system and as such is unhelpful.</li><li>• Policy 8 Managing Flood Risk, criterion a) should include a specific definition of “at significant risk of flooding”. This should align with SPP.</li><li>• The explicit link to Supplementary Guidance on Energy in Policy 4 is welcomed.</li><li>• The positive approach of paragraph 4.7 and Policy 5 Heat Network is exemplary and is</li></ul>		

welcomed.

- The inclusion of Policy 6 Low and Zero Carbon and Generating Technology is welcomed.
- Provided comments on a number of development opportunity sites which we have not previously seen. The R1, R8 and R54 sites will require a Flood Risk Assessment in order to identify the developable area.

#### Stuart McMillan MSP (286)

- Support the Plan's approach to flooding.

#### Scottish Government (411)

- The figure in the final bullet point of paragraph 4.2 should be updated to reflect the finalised Climate Change Plan.
- The Spatial Framework for onshore wind farms should be presented in the Local Development Plan to accord with Paragraph 161 of Scottish Planning Policy.
- The Plan should refer to heat mapping to identify opportunities to use heat sources
- District heating needn't be restricted to major developments or only areas with a heat source or existing network.
- Policy 6 should specify a proportion of greenhouse gas emissions to be saved through the use of low and zero-carbon generating technology and when that proportion will increase.

#### Woodland Trust Scotland (460)

- The important role of trees in providing mitigation and adaptation measures for climate change should be mentioned.
- Adaptation strategies to create and conserve land and cityscapes for wildlife during times of rapid climate change should be included in a no. of policies in the Plan.
- Inverclyde can introduce ambitious tree planting targets and identify appropriate space for woodland creation to meet targets in NPF3.
- A target aiming to increase the area of native woodland cover would be welcomed.
- The Proposed Plan does not recognise that increased woodland cover can help mitigate some effects of flooding and help prevent severe flooding. Suggest amending Policy 8 - Flood Risk Management so that the full value and potential of trees and woods to mitigate flooding through SuDs is recognised in Flood Risk Assessments.
- The full value and potential of trees and woods to help control surface water runoff and drainage through SuDs should be recognised in Council Flood Risk Assessments.

#### Scottish Natural Heritage (SNH) (484)

- In Policy 4, the consideration of impact upon the green network and landscape is welcomed. However, the wider natural heritage should be considered and the wording strengthened.
- Support the requirement in Policy 7 Waste Reduction and Management for development proposals to ensure there are no adverse impacts on the green network. However, we believe the wider natural environment, including landscape, should also be included.

#### **Modifications sought by those submitting representations:**



- Expand Section 4.7 to identify the actions that Inverclyde Council will take to increase energy efficiency across existing public sector housing stock, including working with partners to deliver low carbon energy/heat systems. (89)
- Policy 9 Surface and Waste Water Drainage should address the issue of temporary/construction SuDs, in line with SEPA's guidance. (93)
- Policy 7 Waste Reduction and Management - remove criterion (b) (93)
- Amend Policy 8 Managing Flood Risk, criterion a) to read:  
"at significant risk of flooding (i.e. within the 1 in 200 year design envelope)".(93)
- The final bullet point of paragraph 4.2 should read:
- The R1, R8 and R54 development opportunity sites will require a Flood Risk Assessment
- "70% of non-domestic buildings' heat and cooling to be supplied using low or zero carbon generating technologies by 2032." (411)
- The Spatial Framework for onshore wind farms should be presented in the Local Development Plan.(411)
- The Plan should refer to heat mapping to identify where there may be opportunities to use heat sources.(411)
- Policy 6 should specify a proportion of greenhouse gas emissions to be saved through the use of low and zero-carbon generating technology and when that proportion will increase. (411)
- The importance of trees for climate change mitigation and adaptation should be included in Section 4. (460)
- Adaptation strategies to create and conserve land and city-scapes for wildlife during times of rapid climate change should be included in Policies 12, 14, 33, 34, 36 of the Plan. (460)
- Inverclyde should introduce ambitious tree planting targets and identify appropriate space for woodland creation. (460)
- A target to increase the area of native woodland cover should be set. (460)
- Planning Authority needs to assess the possibility of using trees as a solution to tackling flooding. (460)
- Policy 8 Managing Flood Risk should recognise the role which trees can play in mitigating the negative effects of flooding. (460)
- The full value and potential of trees and woods to help control surface water runoff and drainage through SuDs should be recognised in Council Flood Risk Assessments.
- Amend part e) of Policy 7 Waste Reduction and Management to read:  
"....avoid adverse impact on historic buildings and places and the natural heritage, including landscape and green network". (484)
- Align Policy 4 with Policy HER1 of the adopted Inverclyde LDP and list the following criteria:  
"
  - Effects on the natural heritage, including wild birds;
  - Impacts on carbon rich soils; and
  - Impacts on hydrology, the water environment and flood risk. " (484)

#### **Summary of responses (including reasons) by planning authority:**

##### Energy efficiency in public sector housing stock (89)

- Details of the Council's actions to meet energy efficiency targets in existing public



housing stock are outlined in the Local Housing Strategy 2017-2022. It is not considered necessary to restate this in the Plan, as there are no direct land use implications. It is not considered that any modification to the Plan is required in relation to this matter.

#### Onshore Wind (411)

- The Council's spatial framework for wind energy is set out in detail in the draft Supplementary Guidance on Energy, which will, on adoption, form part of the development plan. The Plan makes clear reference to the spatial framework being available within the Supplementary Guidance. It is therefore not considered necessary to include the spatial framework in the Plan. However, if the Reporter is minded to do so, the Council is not opposed to this and can include a version of Diagram 3 from the Energy Supplementary Guidance (Production) in Section 4 of the Plan.

#### Heat Networks (411)

- The Council is not opposed to the Plan making reference to heat mapping. The following sentence could be added to the end of paragraph 4.7:  
"Heat mapping offers a means to identify heat sources and areas of high heat demand, and thus areas where heat networks could be successfully deployed."
- Whilst Policy 7 requires major developments to include an energy statement, the Policy also requires all development in areas with the potential to make use of a heat network to be designed in such a way as to connect to it.

#### Low and Zero Carbon Generating Technology (411)

- The Council is of the strong opinion that the inclusion of a 'specified and rising proportion of the projected greenhouse gas emissions' within Policy 6 complicates the policy and therefore makes it less likely to be understood and implemented. However, the Council recognises the legislation in effect in relation to this matter and is therefore not opposed to the wording of Policy 6 being amended to:

"Proposals for all new buildings will be required to demonstrate that at least 1% of the carbon emissions reduction standard set by current Scottish Building Standards will be met through the installation and operation of low and zero carbon generating technologies. This percentage will increase to 2% from the beginning of 2022.

The requirement applies to all new buildings with the following exceptions:

- Alterations and extensions to buildings.
- Change of use or conversion of buildings.
- Ancillary buildings that stand alone and cover an area of less than 50 square metres.
- Buildings which will not be heated or cooled, other than by heating provided solely for frost protection.
- Buildings which have an intended life of less than two years.

A statement will be required to be submitted with an application for planning permission to demonstrate compliance with this requirement"

#### Climate Change (411) (460)

- The Council is not opposed to amending the final point of paragraph 4.2 to read:  
“70% of non-domestic buildings’ heat and cooling to be supplied using low or zero carbon generating technologies by 2032.”
- The importance of trees in climate change mitigation and adaptation is referred to in paragraph 11.12 of the Plan. The Council therefore concludes that no modification to the Plan is required in relation to this matter.
- The request for policies 12, 14, 33, 34 and 36 to include adaptation strategies is not considered to be appropriate. In the main, these policies have quite specific development management purposes. It is not made clear what should be included in the policies in relation to adaptation strategies. No modification to the Plan is required in relation to this matter.

#### Supplying Energy (484)

- Policy 4 states that relevant proposals are required to accord with the Council's Supplementary Guidance on Energy. This document contains a full list of criteria which includes those requested in the modification. However, the Council is not opposed to criterion (a) being altered as follows to clarify that the policy protects all resources protected by sections 10 and 11 of the Plan:  
“(a) our natural and open spaces and historic buildings and places”.

#### Managing Flood Risk (93) (286) (460)

- Support for the Plan's approach to flooding is noted.
- The role of woodland cover in helping to mitigate and adapt to flood risk and flood risk events is recognised in Para 11.12 of the Proposed Plan, which states that trees and woodlands “also contribute to sustainable water management, climate change mitigation adaptation.....”. The value of trees and woodlands in managing surface water run-off and associated flood risk is set out in the Suds Manual C753, which Policy 9 Surface and Waste Water Drainage requires all new development requiring surface water drainage to comply with. It is not considered that any modification to the Plan is required in relation to this matter.
- The Council is not opposed to criterion (a) of Policy 8 being amended to read:  
“be at significant risk of flooding (i.e. within the 1 in 200 year design envelope)”.
- The Council notes SEPA's comments on the development opportunity sites identified in Appendix 3 of their representation. The Environmental Report and Strategic Flood Risk Assessment will be updated to reflect these comments. The Council is intending to include site specific actions in the Action Programme, which can include a reference to Flood Risk Assessment in relation to sites R1, R8 and R54.

#### Policy 7 Waste Reduction and Management (484)

- The ‘green network’ referenced in Policy 7 (criterion e) is used collectively to refer to the environmental, recreational and amenity resources identified by section 11.0 Our Natural and Open Spaces. It is, however, accepted that the use of ‘green network’ may

cause some confusion. The Council is not opposed to criterion e) being amended to read:

“avoid significant adverse impact on historic buildings and places and our natural and open spaces”,  
thus referencing all of the resources protected by that section of the Plan, including landscape.

- It is considered that the source of waste that is to be managed in any new facility is a legitimate consideration for the planning authority, with regard to both local accountability and sustainability.

#### Policy 9 Surface and Waste Water Drainage (93)

- Support for the policy, specifically the reference to sewer connections and the requirement for SuDs schemes, is noted.
- It is accepted that the issue of temporary/construction of SuDs should be addressed in Policy 9, in line with SEPA guidance. The Council is not opposed to the first sentence of Policy 9 being replaced with:  
“New build development proposals which require surface water to be drained should demonstrate that this will be achieved, during construction and once completed, through a Sustainable Drainage System (SuDS), unless the proposal is for a single dwelling or the discharge is directly to coastal waters”.

#### **Reporter’s conclusions:**

#### **Reporter’s recommendations:**

Issue 3	Connecting People and Places	
Development plan reference:	Section 5.0, Pages 14-15	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Scottish Environment Protection Agency (SEPA) (93) Mr and Mrs Hargreaves (100) Stuart McMillan MSP (286) Network Rail (288) Judith Adams (377) Scottish Government (411) Woodland Trust Scotland (460) Kilmacolm Civic Trust (479) Scottish Natural Heritage (SNH) (484) Port Glasgow West Community Council (492) Strathclyde Partnership for Transport (SPT) (556) Nicholas Robb (557) Councillor Christopher Curley (559) Councillor David Wilson (560)		
Provision of the development plan to which the issue relates:	Promoting Sustainable and Active Travel (Policy 10), Managing Impact of Development on the Transport Network (Policy 11), Air Quality (Policy 12), Communications Infrastructure (Policy 13)	
Planning authority's summary of the representation(s):		
<u>SEPA (93)</u> <ul style="list-style-type: none"><li>• Support inclusion of Policy 10</li><li>• Support inclusion of Policy 12 and commend the Council for this approach.</li><li>• Welcome the inclusion of a requirement for site communications to avoid adverse impact on the green network, as per Policy 13</li></ul> <u>Mr and Mrs Hargreaves (100)</u> <ul style="list-style-type: none"><li>• There is a need for another free car park in Kilmacolm so that local shops will survive, as without them there is no village community.</li></ul> <u>Stuart McMillan MSP (286)</u> <ul style="list-style-type: none"><li>• I am not convinced that a 'high level impact appraisal' is of substantial detail to determine the potential impact of proposed development. Recommend that a detailed transport impact appraisal is commissioned on the impact of proposed development on the A78.</li></ul> <u>Network Rail (288)</u>		

- Without the provision of additional rail capacity or where required, improved facilities, the Proposed Plan strategy of directing growth toward public transport corridors would mean that the rail network will become constrained and unable to provide increased service. In light of this, we request that developer contributions be required toward new or improved railway infrastructure and facilities, specifically through the Developer Contribution pooling approach.
- We recommended that the LDP provide a designated notification zone around all operational railway infrastructure within which any development application proposals would be notified to Network Rail, similar to that associated with the oil and gas pipelines.

#### Judith Adams (377)

- More parking spaces are required to support shops and retain the vibrancy of Kilmacolm.

#### Scottish Government (411)

- Policy 10 should clearly promote travel in the following order of priority: walking, cycling, public transport, cars. As currently worded, the policy sounds like active travel is something to add into a design rather than forming the basis of it.

#### Woodland Trust Scotland (460)

- With regard to Policy 12, we wish to highlight that trees can be part of a strategy to reduce air pollution.
- Air Quality Assessments should identify trees as mitigation measures.
- Policy 12 could include native woodland planting targets which Inverclyde Council could deliver over the lifetime of this plan as part of a commitment to increase the native woodland cover in Scotland.
- With regard to Policy 10, the provision of high quality greenspace in the areas where people commute to work can help encourage the uptake of active travel.

#### Kilmacolm Civic Trust (479)

- There is a need for additional car parking provision in Kilmacolm village centre.
- We note the Council considers our proposal for an additional car park on undeveloped land near the junction of Gilburn Road/Moss Road) to be too close to the junction and a possible cause of congestion and collision. This is not a busy thoroughfare, with the stretch of Moss Road, and the stretch of Gilburn Road that runs down to Market Place from Moss Road, only being wide enough for a single car in either direction. In addition, people drive carefully and slowly and give way.

#### Scottish Natural Heritage (484)

- Support requirement for development proposals to provide safe and convenient opportunities for walking and cycling, as set out in Policy 10.
- Policy 10 does not detail requirements for sustainable transport provision or include reference to the hierarchy of travel, as set out in SPP.
- Policy 13 – while we support the requirement for new digital communications infrastructure to avoid the adverse impacts identified, this list is quite specific and

should cover the wider natural heritage, including landscape.

- It is unclear whether Policy 11 includes the Active Travel Network.

#### Port Glasgow West Community Council (492)

- The Proposed Plan has not made provision for a relief road for the A8, such as our suggestion of widening the single track Douglichill Road onto Kilmacolm Road. An opportunity has been missed to compensate for when the A8 is stretched or out of action due to accidents, flooding or fire. The delays caused will have a detrimental effect on attempts to attract residents and companies to move to Inverclyde, and increase investment and employment opportunities.

#### Strathclyde Partnership for Transport (SPT) (556)

- Para 5.3 - It is vital to recognise that more often than not, new development will require more service provision to achieve connectivity by public transport to local services and amenities. With the commercial bus market unlikely to alter routes until demand is established, developer contributions should be considered for infrastructure and service provision to encourage public transport use.
- Para 5.5 – this suggests that creating a good quality, integrated active travel network, both within and between sites, is optional as opposed to essential. Reword to strengthen the position.
- Para 5.5 – early dialogue between the Council and SPT is essential when there is an aspiration for a bus service to service new development.
- Policy 10 – While the principles of the policy are welcome, it requires to be strengthened and expanded, to reflect our comments on para's 5.3 and 5.5, as per the proposed modification.
- Para 5.7 – It should be made explicit that measures to mitigate the impacts of development on the transport network include encouraging active travel and the use of public transport.

#### Nicholas Robb (557)

- There is no adequate pedestrian and cycle path segregation between Gourock train station and Gourock pool. The current shared use foot and cycle path is poorly designed, with insufficient space for cyclists and pedestrians to share the path, poor visibility, lack of communication, hazardous surface and level changes and also poor integration to and from roadways. These flaws hinder traffic flow, lead to confusion over rights of way and result in some local residents, particularly the elderly and hard of hearing and sight, being intimidated by passing cycles at narrow points of the route. I propose a dedicated cycle route through Gourock, linking the N75 and the N753.

#### Councillor Christopher Curley (559)

- Para 5.6 identifies that "Future developments of the transport network are to be investigated and included if required in the Local Transport Strategy and Active Travel Strategy". It is important that this also relates to the strategic road network (trunk roads) as future improvements could be identified as being required to this network.

#### Councillor David Wilson (560)

- Support the area of land behind the former Police Station in Kilmacolm (development site 004 in the Main Issues Report) being utilised as a new car park.

#### **Modifications sought by those submitting representations:**

- Identify land for a new car park in Kilmacolm village centre. (100) (377) (479) (560)
- A detailed transport impact appraisal is required to fully understand the impact of proposed development on the A78 and the wider Inverclyde area. (286)
- Para 5.7 – amend the first and second sentences to read:  
 “New development can impact on the existing road and rail transport network. In order to identify any potential capacity issues on the strategic *road* network (i.e. A8 & A78), the Council consulted Transport Scotland on the development opportunities identified in the Plan”.  
 Add the following at the bottom of the paragraph:  
 “The Transport Assessment process should also be used where there is potential for impact of development on the capacity of rail network and service provision including identifying mitigation measures”. (288)
- Para 5.8 – amend the first sentence to read:  
 “To ensure that the road transport network continues to operate efficiently, the Council has standards in place for road development and parking, which new development is expected to comply with”. Add the following to the end of the paragraph:  
 “Where a Transport Assessment identifies mitigation measures to the rail network developer contributions will be sought. Supplementary Guidance will be prepared to set out the Developer Contribution pooling approach to fund improvements to the road and rail transport network.” (288)
- Policy 11 - Amend the first sentence to read:  
 “ ....efficient operation of the road and rail transport network.”  
 Amend the third sentence to read:  
 “...improvements to the road and rail transport network...” Add the following at the bottom of the policy “Development Proposals within 20m of the operational railway will require notification to Network Rail”. (288)
- Amend Policy 10 to align with, and promote the sustainable travel hierarchy. (411)
- Trees should be considered as part of any strategy and policy to improve air quality. (460)
- Policy 10 should set a clear intention that high quality greenspace, including native trees, is provided as part of sustainable transport and as part of designed routes which promote active travel. (460)
- Strengthen the wording of Policy 10 in relation to active travel connections and reference the hierarchy of travel outlined in SPP. Suggest amending the first paragraph of Policy 10 to read:  
 “Development proposals, proportionate to their scale and proposed use, are required to:
  - Enable opportunities in line with the travel hierarchy set out in SPP: walking, cycling, public transport and cars;
  - Provide new or improved opportunities for active travel access within the site and, where required, include links to the wider active travel network.....” (484)
- Amend Policy 11 to read:  
 “Development proposals should not have an adverse impact on the efficient operation of the transport network, including the active travel network....” (484)



- Amend Policy 13 to align with Policy INF6 – Communications Infrastructure of the Local Development Plan1. As an example, we suggest:  
“The Council will support new digital communication infrastructure where the following criteria are met:
  - There are no suitable alternatives
  - There are no adverse impacts, including cumulative, on the built and natural heritage, including landscape and visual impacts; and
  - Appropriate landscaping and screening works are incorporated where necessary.” (484)
- The area of land behind the former Police Station in Kilmacolm (development site 004 in the Main Issues Report) to be utilised as a new car park. (560)
- Para 5.3 – amend the second sentence to read:  
“It is also important to identify where additional transport infrastructure and services are .....” (556)
- Para 5.5 – amend the second sentence to read:  
“It will seek to achieve this by requiring all such development to demonstrate the site is accessible by walking and cycling, both internally and through links to the external path and footway network and, where possible neighbouring sites, local amenities and existing public transport services”.  
Add the following sentence before the last sentence:  
“The Council will require developers to engage in early dialogue with Strathclyde Partnership for Transport in such cases”. (556)
- Policy 10 – amend bullet point a) to read:  
“provide safe and convenient opportunities for walking and cycling access within the site and links to the wider walking and cycling network and, where practicable, direct connections to neighbouring sites, local facilities and existing public transport services”.  
Add bullet point c) as follows:  
“Where there is likely to be demand for bus services, the road network must be suitably accessible”. (556)
- Para 5.7 – Add the following to the end of the paragraph:  
“Such mitigation measures should include measures to encourage walking, cycling and use of public transport over private car use”. (556)
- I propose a dedicated cycle route through Gourock, linking the N75 and the N753. (557)
- Para 5.6 – Add the following sentence:  
“Given the importance to the trunk road network within Inverclyde, Inverclyde Council will work together with Transport Scotland to identify future improvements to be included in the national Strategic Transport Projects Review (STPR2)”. (559)

#### **Summary of responses (including reasons) by planning authority:**

##### Sustainable and Active Travel (General) (556) (557) (559)

- With regard to para 5.3, specifically developer contributions being required toward public transport ‘services’, while it is established practice for new development to contribute to the provision of transport infrastructure, where required, it is considered inappropriate to require developer contributions toward transport ‘services’, as this provision is a commercial decision for private rail and bus operators. In addition, the Council has adopted a position of minimising developer contributions during the period covered by this Plan in order to encourage development to support the repopulation

and inequality priorities. (556)

- It is accepted that the second sentence of para 5.5 should provide a stronger position on active travel. The Council is therefore not opposed this sentence being modified to read:  
“It will seek to achieve this by requiring all such development, proportionate to their scale and proposed use, to make the site accessible by walking and cycling, both internally and, where practicable, through links to the external path and footway network.” (556)
- It would not be practical for para 5.5 to require development proposals to be accessible by active travel both internally “and through links to the external path and footway....” as not all development proposals will be in close proximity to the active travel network. It is also considered that where links to the active travel network are possible, these will in turn provide connectivity to local facilities and existing public transport services. Furthermore, it is established practice for the Council to engage in early dialogue with SPT when a requirement for public transport provision is identified in a Transport Assessment. (556)
- The shared use path between Gourock Train station and Gourock was part of a planning permission for public realm and traffic improvement works at Gourock Pierhead. As such, the design of the shared use path has already been subject to the development management process, which invites and takes account of comments made during consultation. Any requirement for, and provision of a dedicated cycle route through Gourock is a matter for the Local Transport Strategy process, which the LDP reflects. (557)
- Para 5.6 does not cover future improvements to the strategic road network as this matter is addressed in para 5.7, which highlights that during the preparation of the plan the Council consulted with Transport Scotland on potential impacts on the strategic road network and subsequently carried out a high level impact appraisal on the A78 that concluded there would no significant cumulative impacts. In addition, the last sentence of para 5.7 notes that any mitigation measures required as a result of individual developments can be determined through the Transport Assessment process. (559) It is considered that modifications to the Plan are not required in relation to these matters.

#### Policy 10 - Promoting Sustainable and Active Travel (411) (460) (484) (556)

- Policy 10 promotes the spirit of the travel hierarchy by requiring new development, proportionate to scale and proposed use, to be accessible by walking, cycling, public transport and car. While it is considered that a modification to the policy is not required, the Council is not opposed to the first sentence of para 5.5 being modified to reference the travel hierarchy, as follows:  
“The Council aims to ensure that new housing, business and industry, retail, and other commercial and community development is easily accessible, in line with the sustainable travel hierarchy: walking, cycling, public transport and cars”. (411)
- The Plan acknowledges the role and benefits of greenspace in para 11.15, which states that “Open Spaces and playing fields contribute to the attractiveness, wellbeing and biodiversity of Inverclyde.” The Plan also seeks to enhance the provision of greenspace through Policy 36. It is considered that there is no value in repeating this requirement in

specific policies, such as Policy 10. (460)

- With regard to strengthening the policy approach to active travel connections, criterion a) requires development proposals, proportionate to their scale and proposed use, to “provide safe and convenient opportunities for walking and cycling access within the site and, where practicable, include links to the wider walking and cycling network”. It is considered that the requirement for safe and convenient opportunities implies that these can be ‘new or improved opportunities’, while walking and cycling equates to active travel. In addition, it would be inappropriate for criterion a) to require links to the wider walking and cycling network, ‘where required’ or in all cases, as this could result in disproportionate levels of developer contributions being applied to development proposals which are not in close proximity to the existing active travel network. (484) (556)
- It is considered that the provision of suitable access to the road network, where bus services are required, is addressed by the second paragraph of Policy 10, which requires that development, which the Council considers will generate significant travel demand, “should....demonstrate that it can be accessed by public transport”. (556) It is considered that no modifications to the Plan are required in relation to these matters.

Managing Impact of Development on the Transport Network (General) (286) (288) (484) (556)

- With regard to the Plan’s impact on the A78, the Council consulted with Transport Scotland at the pre-MIR and MIR stages of plan preparation, specifically on the impacts of future development on the strategic road network (i.e. A78 and A8). Transport Scotland advised that a ‘high level impact appraisal’ into the impacts of proposed development on the A78 was required. The Council subsequently completed a high level impact appraisal of several large scale development proposals along the A78 (provisionally identified for inclusion in the Proposed Plan) in July 2017, in consultation with Transport Scotland. This concluded that the proposed developments would not have a significant cumulative impact on the trunk road network. (286)
- In relation to para 5.7, the ‘transport network’ referenced in the first sentence includes the road, rail, cycling and walking networks. To aid clarity, the Council is not opposed to the second sentence being modified to read: “....the strategic road network...”.
- Paragraphs 5.7 and 5.8 discuss the Transport Assessment process and developer contributions solely in relation to the strategic and local road networks. To clarify that the Transport Assessment process, and any mitigation measures and developer contributions that result from it, apply to the wider transport network, the Council is not opposed to the following being inserted as the second sentence of para 5.7:  
“Where applicable, development proposals will be required to include transport assessments, which will assess the impact of a development on the transport network and, where necessary, identify appropriate mitigation measures. Where mitigation measures are required, developers will be expected to meet these costs”.  
The remainder of paragraph 5.7 should become a new paragraph.
- Measures to mitigate the impact of development on the transport network are identified in Transport Assessments. It is not considered necessary for para 5.7 to explicitly state

which measures are appropriate. (556)

- With regard to a requirement in the Plan for developer contributions toward rail infrastructure and the preparation of associated Supplementary Guidance, it is noted that Network Rail (288) have stated that “without the provision of additional rail capacity or where required, improved facilities, the Proposed Plan strategy of directing growth toward public transport corridors would mean that the rail network will become constrained and unable to provide increased service.” It has not been made sufficiently clear to the Council what improvements are required to the rail network in Inverclyde in order to remove any constraints that may exist or increase service provision that may be required. Without this information, the Council is unable to justify a specific developer contribution policy towards rail infrastructure. However, Policy 11 does require developers to contribute towards improvements to the transport network that are necessary as a result of proposed development.(288) It is considered that no modifications to the Plan are required in relation to these matters.

#### Policy 11 – Managing Impact Of Development on the Transport Network (288) (484)

- The ‘transport network’ referenced in the policy is intended to include the road, rail, cycling and walking networks. However, for clarification purposes, the Council is not opposed to the first sentence in Policy 11 being amended to:  
“Development proposals should not have an adverse impact on the efficient operation of the transport and active travel network.” (288) (484)
- Under the neighbour notification requirement, Network Rail is notified of any development proposals within 20m of the operational railway line. (288) It is considered that no modifications to the Plan are required in relation to these matters.

#### A8 Relief Road (492)

- Whilst the Plan does make reference to this issue in paragraph 5.6, it is not the appropriate document to identify the requirement, or otherwise, for a relief road for the A8, funding for which does not feature in the Council’s Capital Plan. Such a requirement has to be evidence based and should be taken forward through the next Local Transport Strategy (LTS). It is noted that a relief road was not identified in the most recent LTS (2011-2016). It is not considered that a modification to the Plan is required in relation to this matter.

#### Car Parking Provision in Kilmacolm (100) (377) (479) (560)

- Whilst the Plan does make reference to this issue in paragraph 5.6, it is not the appropriate document to identify a requirement for additional public car parking in Kilmacolm, funding for which does not feature in the Council’s Capital Plan. Such a requirement has to be evidence based and should be taken forward through the next Local Transport Strategy (LTS). It is noted that a new car park in Kilmacolm was not identified in the most recent LTS (2011-2016). It is considered that a modification to the Plan is not required in relation to this matter.

#### Policy 12 - Air Quality (460)

- It is noted that trees can be part of a strategy to reduce air pollution. Inverclyde does

not currently have any Air Quality Management Areas and consequently no strategies to reduce air pollution.

- Where an Air Quality Assessment is required under Policy 12, it is the responsibility of the qualified professional undertaking the assessment to identify appropriate measures on a case by case basis. It would not be appropriate to highlight or require one particular measure, such as tree planting.
- Policy 12 seeks to ensure that new development does not have a detrimental impact on air quality or introduce a sensitive receptor to an area with poor air quality. As such, there is no clear reason or scope to include native woodland planting targets within the policy.

It is considered that modifications to the Plan are not required in relation to these matters.

#### Policy 13 - Communications Infrastructure (484)

- While the 'Green Network' referenced in the policy is a collective term for the environmental, recreational and amenity resources identified by section 11.0 Our Natural and Open Spaces, it is accepted that the use of Green Network may cause some confusion in this policy context. The Council is therefore not opposed to Policy 13 being modified to read:  
"The Council will support new digital infrastructure where it is sited to avoid adverse impact on: the streetscape; the amenity and operations of existing and adjacent uses; our natural and open spaces; and our historic buildings and places."
- It is considered that Policy 13 supports proposals for communications infrastructure while ensuring that any adverse impacts on the streetscape, the amenity and operation of existing and adjacent uses, the green network, and historic buildings and places will be avoided. It is not clear what value a criterion requiring proposals to demonstrate that there are no suitable alternatives would add if a proposal is shown not to have any adverse impacts. In addition, it is considered that the policy reference to 'impacts' covers both individual and cumulative impacts, that any adverse impacts on built and natural heritage are addressed in the Policy, subject to the modification of the term 'Green Network', and that the provision of landscaping will form part of a proposal, where necessary to avoid adverse impacts on the receptors identified in the policy.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

<b>Issue 4</b>	<b>Our Towns, Villages and Countryside</b>	
<b>Development plan reference:</b>	Section 6.0, Pages 18-20	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<div> <div> Julie McGowan (6)  Wilma Currie (7)  Alan Halliday (10)  Angus MacDonald (81)  SEPA (93)  Michael Stanley (303)  Gabrielle McFarlane (316)  James Orr (318)  Arabella Yelland (322)  Tim Glanton (325)  Ralph Leishman (327)  Nicholson McShane Architects for Mr Steven Morecroft (348)  Shena Cleat (353)  Sylvia Cowan (373)  Judith Adams (377)  Elizabeth McFarlane (382)  Susan McLean (385)  Helen McCall (388)  Moira Grant (392)  Moira Deakin (399)  Tom Fyfe (418)  Shona Donnachie (437)  Kilmacolm Community Council (443)  Helen Mathie (447)  Gavin Madely (450)  Frank Gillone (454)  Anthony Murray (468)  David Walker (473)  Kilmacolm Civic Trust (479)  Barry Swan (486)  David Doherty (490)  Rosemary Hammond for Port Glasgow Road Plots (499)  Colin Hancock (553)  Councillor David Wilson (560) </div> <div> Juliet Loudon (8)  Karina Young (54)  Homes for Scotland (89)  Frances Fulton (299)  William Gilmour (308)  Jane Finlay (317)  Rosemary Scott (320)  Scott McFie (324)  Lesley Davidson (326)  Rhona McGinn (328)  Lynda Garrett (366)  John Cleat (376)  Eleanor Tasker (379)  Ewan McLean (383)  Julie Ballantyne (387)    Gladman Scotland (394)  Janet Stewart (410)  Peter Wylie (419)  Linda Taylor (440)    Beth Madely (448)  Roderick Blackwood (452)  Montagu Evans for Quarriers (461)  Antony Vitrano (469)  Christina Forbes (475)  Scottish Natural Heritage (484)  Elizabeth Forbes (489)  West College Scotland (494)  Ian MacConnacher (558)  David Madden (571) </div> </div>		
<b>Provision of the development plan to which the issue relates:</b>	Green Belt and Countryside (Policy 14), Soils (Policy 15) and Contaminated Land (Policy 16)	
<b>Planning authority's summary of the representation(s):</b>		



Julie McGowan (6), Wilma Currie (7), Juliet Loudon (8), Alan Halliday (10), Karina Young (54), Angus MacDonald (81) Frances Fulton (299), Michael Stanley (303), William Gilmour (308), Gabrielle McFarlane (316), Jane Finlay (317), James Orr (318), Rosemary Scott (320), Arabella Yelland (322), Scott McFie (324), Tim Glanton (325), Lesley Davidson (326), Ralph Leishman (327), Rhona McGinn (328), Shena Cleat (353), Lynda Garrett (366), Sylvia Cowan (373), John Cleat (376), Judith Adams (377), Eleanor Tasker (379), Elizabeth McFarlane (382), Ewan McLean (383), Susan McLean (385), Julie Ballantyne (387), Helen McCall (388), Moira Grant (392), Moira Deakin (399), Janet Stewart (410), Tom Fyfe (418), Peter Wylie (419) Shona Donnachie (437), Linda Taylor (440), Helen Mathie (447), Beth Madely (448), Gavin Madely (450), Roderick Blackwood (452), Frank Gillone (454), Anthony Murray (468), Antony Vitrano (469), David Walker (473), Christina Forbes (475), Barry Swan (486), Elizabeth Forbes (489), David Doherty (490), Colin Hancock (553).

- Support for no development in/retention of the green belt, with some specifying housing and some specifying the Kilmacolm/Quarriers Village green belt. Reasons include: Kilmacolm infrastructure cannot cope with any more development; need for development has not been proven; it is an area of outstanding beauty; biodiversity/flora/fauna; recreational use; brownfield sites should be developed first.

#### Homes for Scotland (89)

- There is a lack of greenfield land release across the Renfrewshire HSMA within Inverclyde. This is directly contrary to obligations set out in Clydeplan and agreed to by Inverclyde Council. A tight green belt boundary means there are next to no opportunities for greenfield release and no means to meet the identified under-supply of homes through a plan led system. Policy 14 of Clydeplan permits a review of green belt boundaries. The lack of a review within Inverclyde demonstrates a failure of the Plan.

#### SEPA (93)

- Support inclusion of Policy 14 on Green Belt and Countryside.
- Welcome the inclusion of Policy 15 on Soils but require it to protect peat and carbon rich soils by avoiding the disturbance and excavation of carbon rich soil. Areas of carbon rich soil must be identified as a constraint for site allocations and areas of search for energy proposals.
- Support the inclusion of Policy 16 on Contaminated Land and recommend that site investigation and remediation measures are consistent with PAN33.

#### Nicholson McShane Architects for Mr Steven Morecroft (348)

- Land adjacent to Strone Farm, Greenock should be included within the urban area. It is sandwiched between existing residential and brownfield land and is an ideal location to extend the urban area without significant impact on the green belt.

#### Gladman Scotland (394)

- Question the blanket use of green belt designation across authority area. No green belt review has been undertaken.

#### Kilmacolm Community Council (443)



- Green belt policies will need to be rigorously defended if large scale developments are to be prevented from spoiling the character and setting of the village.

#### Woodland Trust Scotland (460)

- Welcome that development associated with woodland creation is acceptable in green belt and countryside, but to ensure such development is encouraged there needs to be an appropriate woodland and forestry strategy.

#### Montagu Evans for Quarriers (461)

- The Upper area of Quarriers Village has potential to be a template for the expansion and improvement of existing facilities and for the introduction of further care provision. It would be sensible to have a mix of care and residential uses, along with Class 4 uses continuing within the Upper Village, as has been successfully achieved within the main Quarriers Village. There is an area of land which is used for allotments outside the village boundary. This should be designated within the village boundary for a mix of uses including care facilities, residential and Class 4 Business.

#### Kilmacolm Civic Trust (479)

- Pleased that the Plan maintains Inverclyde's policy on green belt preservation. There should only be release of green belt if there is an irrefutable proven need for large numbers of new houses. Should any such need be identified, the location must be planned and not at the whim of speculative property developers.

#### Scottish Natural Heritage (484)

- Support Policy 15, but suggest adding more detail to the requirements. Would welcome the inclusion of restoration of peatland habitats. No map of carbon rich soils has been included to give spatial context.

#### West College Scotland (494)

- The summary of Greenock in para 6.2 would benefit from reference to the important role of West College Scotland in terms of the economic, social, administrative and commercial make-up of the town.

#### Rosemary Hammond for Port Glasgow Road Plots (499)

- Objection to the inclusion of 'The Plots' on Port Glasgow Road, Kilmacolm in the green belt. These plots should be included in the residential area. The green belt boundary is incorrect. This is not a matter of interpretation but is a factual error made in 1985. These plots were the extensions of gardens for the houses opposite. Planners have recommended that this land be removed from the green belt on several occasions. Previous Reporters have stated it is uncertain that these plots were ever zoned as green belt.

#### Ian MacConnacher (558)

- An area of land between Gibson Lane and Smithy Brae (adjacent to Rosebank Terrace), Kilmacolm has been shown in the Plan as green belt, despite being within the residential area in the 2014 Adopted Plan. This is understood to be an error in the creation of the Proposed Plan.

#### Councillor David Wilson (560)

- Support for conditions for development in the green belt and countryside set out in Policy 14.

#### David Madden (571)

- An area of land on Port Glasgow Road, Kilmacolm (former quarry site) has been shown in the Plan as green belt despite being within the residential area and identified as a residential opportunity (r63) in the 2014 Adopted Plan. This appears to be a drafting error.

#### **Modifications sought by those submitting representations:**

- Include a green belt review to ensure Plan is capable of directing planned growth to appropriate locations. (89)
- Require Policy 15 to protect peat and carbon rich soils by avoiding the disturbance and excavation of carbon rich soils in the first instance. (93)
- Change designation of land at Strone Farm, Greenock from green belt to within the Residential Area (348)
- A green belt review should be undertaken. Land requires to be released from the green belt and countryside to facilitate limited development in sustainable locations in order to provide a supply of housing land across all market areas. Development of land within green belt is directly linked to delivery of 25% social rent housing requirement of Policy 17. Incorrect reference to greenfield in that policy. (394)
- Include allotment area within Quarriers Village boundary for a mix of care, residential and Class 4 uses.
- The following criteria should be added for developments affecting carbon rich soils:
  - It has been clearly demonstrated that there is no viable alternative;
  - The economic and social benefits clearly outweigh the potential detrimental effects on the environment; and
  - It is for renewable energy generation or mineral extraction, and the proposals include provision for the site to be enhanced or returned to its former status. (484)
- Include reference to West College Scotland in paragraph 6.2. (494)
- Remove 'The Plots' on Port Glasgow Road, Kilmacolm from the green belt and include in residential area. (499)
- Show land between Gibson Lane and Smithy Brae as within residential area rather than green belt. (558)
- Show land at Port Glasgow Road, Kilmacolm within the village envelope and reflect that it is zoned for the development of 3 houses.

#### **Summary of responses (including reasons) by planning authority:**

Support for protection/retention of green belt and countryside, requirement for green belt review etc. (7, 8, 10, 54, 81, 89, 93, 299, 317, 318, 322, 324, 325, 326, 327, 328, 353, 366, 373, 376, 377, 382, 383, 385, 388, 392, 394, 399, 410, 419, 437, 440, 443, 447, 454,

468, 469, 473, 475, 479, 486, 489, 490, 553, 560)

- It is considered that the majority of responses listed above have commented on green belt matters in relation to housing land matters. As such, it is closely related to Issues 5 and 8, and to a lesser extent 6 and 7.
- The context for there being a green belt in Inverclyde is provided by paragraph 49 of Scottish Planning Policy, which states that 'the development plan may designate a green belt around a city or town to support the spatial strategy by:
  - directing development to the most appropriate locations and supporting regeneration;
  - protecting and enhancing the character, landscape setting and identity of the settlement; and
  - protecting and providing access to open space'.
- It is considered that the Inverclyde green belt serves these purposes, and that these are important elements of Inverclyde's spatial strategy. Policy 14 of the Clydeplan Strategic Development Plan states that local authorities should designate a green belt to ensure that the objectives of paragraph 8.15 of Clydeplan are achieved. Some of these objectives are similar to those set out in Scottish Planning Policy, but there are additional objectives relating to: creating and safeguarding community identity; maintaining the natural role of the environment; supporting the farming economy; and meeting requirement for the sustainable location of rural industries. It is considered that the Inverclyde green belt serves these objectives also. Scottish Planning Policy states in paragraph 51 that a green belt 'may encircle a settlement or take the shape of a buffer, corridor, strip or wedge' and that 'Local development plans should show the detailed boundary of any green belt,...'. Paragraph 52 requires local development plans to describe the types and scales of development which would be appropriate in the green belt, and gives an indication of what these may include.
- Through Policy 14, the Local Development Plan identifies a green belt and sets out what types of development will be acceptable within it. This is complemented by Policy 19, which sets out the circumstances when individual and small scale housing development will be supported in the green belt. The Proposals Map clearly identifies the inner and outer boundaries of the green belt. Having regard to Scottish Planning Policy and Clydeplan Strategic Development Plan, it is the Council's position that it has justifiably and correctly identified a green belt in the Inverclyde Local Development Plan. The comment that there has been a blanket use of green belt designation across Inverclyde is not accepted. Only 45% of the Inverclyde authority area is covered by green belt designation, and this is in the form of encircling settlements, as permitted by Scottish Planning Policy.
- Turning to the requirement for a green belt review, a full review of the green belt boundaries was undertaken as part of the preparation of the 2014 Inverclyde Local Development Plan (Production). It was not considered a requirement or necessary to undertake a full review of the green belt as part of the preparation of this Plan. Neither Scottish Planning Policy nor the Clydeplan Strategic Development Plan requires a full review of the green belt to be undertaken with every iteration of the Local Development Plan. However, as part of the Proposed Development Site Assessment exercise (Production) a number of sites in the green belt surrounding Kilmacolm and Quarriers Village were assessed on a range of criteria including the strength of the existing and proposed green belt. There has therefore been a review of the green belt in key

locations, in particular those locations facing development pressure.

- As mentioned above, this matter is closely related to Issues 5 and 8, relating to housing land, particularly in the Kilmacolm and Quarriers Village area. As such, the Council would not expect the Reporter to be able to conclude on this matter without reference to those issues. However, it is the Council's position that, other than those locations identified in the Plan, no additional green belt land needs to be identified for housing development, and as such, it is recommended to the Reporter that no changes are made to the Plan in relation to this matter.

#### Soils (93, 484)

- The Council is of the view that the Plan as published offers a level of protection to carbon rich soils that is in accordance with Scottish Planning Policy, and that the requests of SEPA and SNH go beyond the level of protection offered to soils by Scottish Planning Policy. However, the Council also acknowledges that there has been a stronger emphasis put on the protection of carbon rich soils since the publication of Scottish Planning Policy in 2014, including through the publication of Scotland's soil maps in 2016 (<http://soils.environment.gov.scot/>). The Council is not opposed to the amendment of this policy and suggests that a hybrid of the Plan policy and the policy suggested by Scottish Natural Heritage may be appropriate as follows:  
"Development on prime agricultural land or affecting carbon rich soils will only be supported if:  
a) it is on land allocated for development in this Local Development Plan or meets a need identified in the Strategic Development Plan; or  
b) it is for renewable energy generation or mineral extraction, and the proposals include provision for the site to be returned to its former status; or  
c) it is for small scale development directly linked to a rural business.  
In all other circumstances, it is a requirement that:  
d) it has been clearly demonstrated that there is no viable alternative; and  
e) the economic and social benefits clearly outweigh the potential detrimental effects on the environment.  
For carbon rich soils, it will also need to be demonstrated that adverse impacts on the soil resource during the construction and operational phases of a development will be minimised and the development will not result in a net increase in CO2 emissions over its lifetime."

#### Land adjacent to Strone Farm , Greenock (348)

- The site promoted for inclusion within the residential area sits to the south of the Strone Farm area of Greenock. It is a grassland area, which appears unmanaged, and bordered by trees and with some small trees within. It rises from north to south. It is crossed east-west close to its northern and southern borders with electricity cables, carried by wooden poles.
- The site is not considered to be a logical extension to the urban area. It would create a wedge of the urban area extending into the green belt and weaken the green belt boundary at this location. In particular, it would create pressure for the removal of land to the immediate north from the green belt. That is a site which has just recently been returned to green belt after being identified as a development opportunity in the last two development plans for the area (see site r23 in Production).

- It is considered that the promoted site, being part of an area rising from north to south from the settlement edge contributes to the character and landscape setting of Greenock, by preventing the spread of the built-up area into higher ground. It also acts as a buffer between the urban area and the Auchmountain Glen Local Nature Conservation Site to the south.
- It is assumed that the site is being promoted for inclusion in the urban area so that it ultimately becomes identified for, or gains permission for residential development. In response to this, reference is made to the removal through this Plan of the land to the north, which has been identified as a greenfield housing development opportunity in the last two plans, and has not been developed. It is therefore considered that the site promoted here is unlikely to be effective. Access to the site is by way of a single track road that would need considerable improvement and investment, and the electricity infrastructure referred to above would minimise the developable area or incur significant costs to relocate, if the latter is possible. The site is not considered to offer an effective housing development opportunity. It is not considered that any modification should be made to the Plan in relation to this matter.

#### Quarriers Village – upper village (461)

- The area referred to in the representation as the 'upper village' is a low density westwards extension of the main village, containing a mix of residential, care and community uses. It is designated in the Plan as a residential area, where Policy 20 applies, which seeks to protect the amenity, character and appearance of the area. It is considered that this remains the appropriate zoning for the area, given the existing uses there. Whilst the uses proposed by the representation would not necessarily be out of keeping with this zoning, it is considered important that the zoning remains as is, so that the character and amenity of the existing uses/area is protected.
- The representation also seeks for an allotment area to the south of the village boundary to be included within it. It is considered that an extension to the village boundary at this location would significantly weaken the green belt boundary. Although the boundary is not based on strong landscape features or a road, there is a strong geometric/linear boundary, which the inclusion of the allotment area would breach and lead to pressure for further southern extension of the village at this location. The existing allotment use is considered compatible with the green belt zoning at this location. It is not considered that any modification should be made to the Plan in relation to this matter.

#### West College Scotland (494)

- The Council is not opposed to a reference being made to West College Scotland in paragraph 6.2 and it is suggested that this could best be achieved by amending the second sentence to read:  
 "It is Inverclyde's main administrative centre, with the Council and the Health and Social Care Partnership based in the town centre along with West College Scotland (Greenock campus)."

#### The Plots, Port Glasgow Road, Kilmacolm (499)

- The land constituting 'The Plots' in Kilmacolm has continually been identified as green



belt in the adopted versions of development plans for Inverclyde since the 1988 Inverclyde Local Plan, and thereafter the 2005 Local Plan, and the 2014 Local Development Plan. (The Council is unsure what is being referred to by an error made in 1985). The designation of the site as green belt was considered as part of the 2005 Local Plan Inquiry and the 2014 Local Development Plan Examination. In both instances, the status of the site as green belt was confirmed by the Reporter, and there have been no material changes in circumstance since to indicate that the designation of the site should change.

- It is noted that the representation in relation to this site at the proposed plan stage has sought for the inclusion of the site within the residential area, rather than for a specific development purpose. However, the site was suggested for housing development at the pre-MIR stage, and has been through the Proposed Development Site Assessment process (Production). This assessment records that the site is not covered by any environmental designations, and could be developed within the Plan period. It is understood that the owners of 'The Plots' have an agreement in place to enable its delivery. On technical matters, the Council's Roads Service has not objected to the development of the site, but SEPA has highlighted a potential flood risk associated with the burn which runs through the site. The Council's view is that this would need culverted to allow the full development of the site. It is not certain that this would be acceptable to SEPA.
- The Council's main concern with regard to the development of this site is the impact on the character and setting of Kilmacolm. Kilmacolm is characterised by a number of green wedges, which 'carry' the surrounding countryside into the heart of the village. 'The Plots' forms part of one of these wedges, one which affords a view into the heart of the village, emphasising its rural setting, as you approach from the north-west. Whilst this view is momentarily interrupted by the two existing properties to the south side of Port Glasgow Road, 'The Plots' site extends the availability of this view significantly once these properties are passed. Its development would have a significant impact on the availability of this view, which characterises Kilmacolm, and therefore 'The Plots' site must be seen as meeting one of the purposes of green belt set out by Scottish Planning Policy, being 'protecting and enhancing the character, landscape setting and identity of the settlement' (para 49).
- Reference can be made to previous Reporters' findings on this matter. From the 2004 report into objections to the 2002 Inverclyde Local Plan Final Draft, the Reporter finds that it is "reasonably clear that it ('The Plots') forms part of the northern 'sensitive wedge'" (para 7.436), and that the two existing houses south of Port Glasgow Road to the north west of 'The Plots' are the 'anomaly' rather than creating a gap site (para 7.437). From the 2014 Examination Report into the 2013 Proposed Inverclyde Local Development Plan, para 4 of the Reporter's conclusions on this matter (Issue 9.3) states:
- "The openness of the site allows attractive views to be had from Port Glasgow Road across Kilmacolm's northern green wedge and to open countryside to the north-west. Due to the distance (around 120 metres) between the houses to the south and to the north, the site does not appear as a gap in an otherwise built-up frontage, but as an integral part of the agricultural/ landscape block between Port Glasgow Road and the former railway line in the valley to the west. In this context the houses to the north appear as a somewhat isolated group. Particular value can be ascribed to the ongoing

openness of the site due to its being located on one of the main roads into Kilmacolm. It is therefore regularly visible to a large number of people travelling on this road and plays an important role in contributing to the rural character of the village.”

- The Council is of the view that the removal of the site from the green belt and inclusion within the residential area would mean it is more likely to be developed in the future, even if it is not identified for a specific development purpose. Given the Council’s view that the development of the site would be to the detriment of the character and setting of Kilmacolm, a view that has been shared by Reporters who have examined the site in the past, it is not considered that any modification should be made to the Plan in relation to this matter.

#### Land at Gibson Lane/Smithy Brae, Kilmacolm (558)

- It is accepted by the Council that a drafting error on the Proposals Map has resulted in an area of land between Gibson Lane and Smithy Brae being shown as in the green belt in error. The designation of land in this area should be as per the Adopted Inverclyde Local Development Plan 2014 (see Production). Therefore, the Council is not opposed to the suggested change.

#### Land at Port Glasgow Road, Kilmacolm

- It is accepted by the Council that a drafting error on the Proposals Map has resulted in an area of land at Port Glasgow Road, Kilmacolm being shown as in the green belt in error. The village/green belt boundary at this location should be as per the Adopted Inverclyde Local Development Plan 2014 (see Production), and the Council is not opposed to the suggested change. However, the site should not be shown as a development opportunity as the site only has capacity for 3 units (the Plan shows sites with a capacity of 4 or more units), and because the development of at least one house is underway.

#### **Reporter’s conclusions:**

#### **Reporter’s recommendations:**



Issue 5	Housing Land Supply, Housing Supply Targets and Housing Land Requirement	
Development plan reference:	Section 7.0, Pages 21-27	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<div>Homes for Scotland (89)</div> <div>SEPA (93)</div> <div>Gerard Hampsey (120)</div> <div>Inverclyde Housing Partnership Group (294)</div> <div>Peel Land and Property (343)</div> <div>Gladman Developments Ltd (394)</div> <div>Mactaggart &amp; Mickel Homes Ltd (398)</div> <div>Taylor Wimpey (West Scotland) Ltd (401)</div> <div>Scottish Government (411)</div> <div>DM Land (415)</div> <div>Quarriers/Gladman Developments Ltd (457)</div> <div>John Watson (467)</div> <div>Sanmina SCI (472)</div> <div>Scottish Natural Heritage (484)</div> <div>Strathclyde Partnership for Transport (556)</div> <div>Councillor David Wilson (560)</div>		
Provision of the development plan to which the issue relates:	Our Homes and Communities	
Planning authority's summary of the representation(s):		
<div>Homes for Scotland (89)</div> <div>(Note: it is considered that the detailed numbers provided by Homes for Scotland are best read in the context of its full response and are not included in this summary. Only headline numbers are included.)</div> <div><ul style="list-style-type: none"><li>The planned housing land supply across Inverclyde is overly reliant on delivery of new homes within the Priority Places. It is not clear from the Action Programme or Supplementary Guidance how the delivery rates set out in the 2017 housing land audit or 2018 Technical Note will be facilitated.</li><li>An emerging LDP must consider whether the strategic Housing Supply Target (HST) has been met from the base date of the SDP and can continue to be met to the end of the plan period. LDP must take into consideration progress towards satisfaction of the strategic HST since 2012 and ensure it will be met by the end of the plan period. The Plan must set out how the strategic (all tenure) HST of 4,400 new homes will be met between 2012 and 2029. To this a 15% generosity margin must be applied to ensure enough land can be available to meet the HST. Subsequently, the Housing Land Requirement (HLR) would be enough land that has delivered or is capable of delivering at least 5,070 new homes between 2012 and 2029.</li></ul></div>		

- The compound approach to calculating the housing land supply position should be applied meaning account is taken of past completion levels. The alternative annualised approach will result in a development plan that is unable to satisfy Scottish Planning Policy.
- The Council's Housing Land Technical Report confuses matters and includes several unexplained and un-evidenced assumptions within the Council's calculations. It includes delivery from sites that are disputed and delivery capacities and rates that are disputed, in both the periods to 2024 and 2029.
- Homes for Scotland has set out a land supply position based on the compound approach in Annex 2 of its representation. This illustrates that the Plan has an under-supply of land for at least 330 new homes in the period to 2029. This shortfall rises to 685 new homes if disputed sites are taken into account.
- The Plan has not allocated sufficient land that is effective, or capable of becoming effective, to meet the strategic HLR nor has the Plan provided a credible evidence base to justify the assumptions of land supply including changes to private sector output from the Plan's Priority Places/disputed sites and other suggested changes to the Established Land Supply.
- The HST is not as aspiration, it is a commitment. The Council must not draw back from the HST of 4,400 new homes between 2012 and 2029.
- The Council has stated that it will deliver 170 private sector homes in the Renfrewshire SHMA between 2012 and 2029 and it is obligated to allocate land in the Plan for at least 200 private sector homes that are capable of being delivered by 2029. There has been no significant greenfield release in the Renfrewshire SHMA since 1997/97. Clydeplan retains a requirement for a range of housing sites allocated within the Renfrewshire SHMA.
- There is unlikely to be an unmet numerical affordable housing need within Inverclyde. The removal of a requirement to provide an affordable housing contribution from private sector sites across the majority of Inverclyde is welcomed.
- The retention of a 25% affordable housing requirement within the Inverclyde villages is noted. The obvious response to the stated need for retaining requirement in these locations is to bring forward allocations through the development plan. A failure to do so weakens the Plan.

#### SEPA (93)

Support Policy 17 requirement for additional housing land to have due regard to the policies in the Plan.

#### Gerard Hampsey (120)

- Notes that there are only 18 affordable houses proposed for Gourock and none for Kilmacolm, nearly 1000 for Greenock and 400 for Port Glasgow. Is there some sort of divide in Inverclyde?

#### Inverclyde Housing Partnership Group (294)

- The development of more balanced communities remains a policy aim and strategic objective of Inverclyde Council. This objective is being pursued corporately with both RSL partners and private housing developers. The removal of an affordable housing requirement on private development sites is therefore disappointing. However, pleased that a 25% requirement for social rented housing remains across any greenfield sites

within Inverclyde villages.

- The Glasgow and Clyde Valley HNDA identifies that in Inverclyde downsizing private owners prefer to remain as owners rather than tenants. This suggests a requirement for a size, type and tenure of housing currently in short supply.
- The LDP should acknowledge current and projected demographics. This would help prospective developers determine the type of housing required to meet the needs of the people of Inverclyde and beyond. This could assist in the key Inverclyde priority of repopulation by providing housing which is desirable to many people from outwith Inverclyde.

#### Peel Land and Property (343)

- Support for the removal of requirement for affordable housing provision within private sector developments.

#### Gladman Developments Ltd (394)

#### Quarriers/Gladman Developments Ltd (457)

- The Plan fundamentally fails to set out the housing land supply target and requirement for the plan period to 2024 and 2029. In not doing so, the Proposed Plan does not comply with Scottish Planning Policy paragraph 115.
- Policy 17 fails to set out the housing land strategy for the Plan period. It purely caters for the event in which there is a shortfall if the 5-year supply of effective housing land.
- The Plan recognises there is a limited supply of social rented housing available within the Inverclyde villages and no land identified for social rented housing development in these areas. Despite recognising the requirement, the Council has removed the 25% affordable requirement for non-greenfield housing developments. This raises concerns over how the Council expect to deliver social rented housing. The Council's strategy is significantly flawed.
- Schedule 4 has an over reliance upon a range of sites that have been in the housing land supply for so long that they are disputed or considered ineffective. For both the Inverclyde HMA and Renfrewshire SHMA, the compound approach set out in the Housing Land Technical Report shows that there are insufficient sites identified to meet the full private sector HLR over the Plan period.
- The Housing Supply Targets and Housing Land Requirement set out in Clydeplan have not been adequately incorporated into the Plan. The Housing Land Technical Report fails to support the strategy adopted in the Plan.
- The level of supply of housing identified in Schedule 4 is questioned. The effectiveness of some sites is questionable, given that effectiveness is clearly an issue. These include: Inverkip Power Station; Spango Valley, Greenock; Peat Road/Hole Farm, Greenock; Ravenscraig Hospital, Greenock; Smithy Brae, Kilmacolm.
- Object to lack of clearly defined housing land supply strategy in the Plan and the failure to include any additional housing sites in Schedule 4 within the Renfrewshire Sub Housing Market Area. The approach taken clearly fails to meet the requirements of Scottish Planning Policy as an adequate number of sites have not been identified to meet the private sector housing needs in the Housing Market Areas relevant to Inverclyde Council.
- Looking at the 5-year housing land supply, the land supply to 2024 and the housing land supply from 2024-2029, in every scenario there is a shortfall in the housing land supply in the Renfrewshire Sub Housing Market Area (refer to full rep for tables).
- Inverclyde Councillors voted to amend a version of the Plan that allocated a site in

Kilmacolm to meet the shortfall in the housing land supply in the period to 2024 and contribute to the 2024-2029 shortfall. In doing so, this has made the plan out-of-date.

- From 1996/97 to 2016/17, only 226 units were delivered in the Renfrewshire SHMA, nearly 80% on brownfield, with no significant release of greenfield land. These completions all appear to be owner-occupied, suggesting no affordable housing has been delivered in this area in the period since 1996/97. Inverclyde Council should be releasing land to create a diverse housing land supply.
- The Plan fails to allocate sufficient land to meet the Housing Land Requirement and as such the range and choice of sites should be increased via Schedule 4.

#### Mactaggart & Mickel Homes Ltd (398)

- The Plan does not allocate sufficient land to meet the housing land requirement that is clearly established in the approved Clydeplan (2017). Clydeplan established a specific requirement for the Inverclyde part of the Renfrewshire Sub Housing Market Area, which is in effect Kilmacolm and Quarriers Village. The non-allocation of housing land in this area is at odds with the Housing Land Technical Report published with the Plan and the Main Issues Report and planning officer reports. The Main Issues Report identified a shortfall of land for 52 houses in the Renfrewshire Sub Housing Market Area.
- The Plan will not, in its current form, ensure the maintenance of a 5-year effective housing land supply from the point of Plan adoption in 2019. There is a shortfall of housing land for the period to 2024 and also from 2024-2029. The Plan should be addressing this by allocating land in the Renfrewshire Sub Housing Market Area.
- Policy 17 states a preference for development of brownfield land, but this is not an embargo on development of greenfield land, where there is an identified need and no suitable brownfield sites available to meet the need. There are no brownfield sites over and above those already allocated in Kilmacolm or Quarriers Village that can accommodate the number of houses required to meet the need/shortfall to 2024 and 2029.
- The shortfall, including a 25% allowance for affordable housing requirement, is 48 houses for the 2019-2024 period and 86 for the 2024-29 period, giving a total shortfall of 134 houses to 2029. Between Council and own figures there is a consistently found shortfall in both time periods.
- The Plan accepts a need for more affordable housing in the Inverclyde villages, and through Policy 17 indicates that the Council will support housing on greenfield sites subject to the incorporation of 25% affordable housing.
- There are only limited and very modestly sized housing land allocations in Kilmacolm and there does not appear to have been any meaningful residential development at Kilmacolm for in excess of 10 years. Kilmacolm has an older population, and young people are migrating out of the town to secure a house.

#### Taylor Wimpey (West Scotland) Ltd (401)

- Endorse Homes for Scotland's submissions on Policy 17 and adopt them as their own position.
- The Council has stated that it will deliver 170 private sector homes in the Renfrewshire Sub Housing Market Area between 2012 and 2029 and it is obligated to allocate land for at least 200 private sector homes that are capable of being delivered by 2029 through the Plan. There is a deficit of a minimum of 84 new homes within the Inverclyde part of the Renfrewshire Sub Housing Market Area. Dispute the Council's Housing Land

Technical Report which states 'no acceptable opportunities to achieve this were identified'.

- Object to the 25% affordable housing requirement being restricted to social rented only.

#### Scottish Government (411)

- The Housing Supply Target (split into affordable and market sector) should be set out for the Plan area reflective of the requirements defined in Clydeplan.
- The Council should identify and explain the generosity allowance added to the housing supply target and identify the Housing Land Requirement for the area over the Plan period reflective of the requirements defined in Clydeplan.

#### DM Land (415)

- Objection to the principle of no release of land within the Renfrewshire Sub Housing Market Area.
- Clydeplan indicates that the Renfrewshire Sub Housing Market Area should contribute approximately 200 houses in the Inverclyde Plan to 2029. The Plan has an allocation of 117 houses and no intention of releasing any further land to 2024 or 2029. It would be appropriate to make a release to help make up that shortfall.

#### John Watson (467)

- There is no evidence to suggest that Inverclyde's repopulation aspiration is going to happen. The 15% generosity margin (applied to Housing Supply Targets) is unnecessarily generous in the context of a declining need in Inverclyde. The generosity allowance should be weighted by distance from the labour market so as to minimise need for additional commuting. The housing land policy is therefore providing unrequired land. If Inverclyde is going to halt population decline it needs to ensure investment is in the Port Glasgow and Greenock areas.

#### Sanmina SCI (472)

- The Plan should include wording to define what 'accelerated delivery' status means for individual sites within the context of the Plan, in order to ensure clarity.

#### Scottish Natural Heritage (484)

- Support the requirement for 25% of housing in the Inverclyde villages to be available for social rent. However, policy does not provide a robust hook to this Supplementary Guidance.

#### Strathclyde Partnership for Transport (556)

- Re Policy 17 - Infrastructure and service constraints can influence the deliverability of development and therefore the effectiveness of a site. The ability of existing infrastructure and service provision to meet the demands from new housing development should be considered in relation to any new land allocations. If a constraint is identified, mitigation measures to address the constraint should be required and the deliverability of such measured considered. In terms of public transport this would involve consideration of the proximity to the existing bus and rail network



and/or any service or infrastructure requirements to make the development acceptable in planning terms, and whether the cost of any such requirements can be met either by the developer or through pre-existing plans. This is of particular significance in relation to the release of new greenfield sites where the intention is for 25% of such allocations to be available for social rent where car ownership levels are often lower.

Councillor David Wilson (560)

- The need is for affordable houses to buy not social housing. This is what young people and those downsizing require. Social housing is not now an entry to the housing ladder.

**Modifications sought by those submitting representations:**

- Expand paragraph 3.10 to set out delivery mechanisms and other interventions that will be deployed to ensure Priority Places can come forward in the timescales and rates expected. (89, 401)
- Redefine the LDP2 Action Programme as a delivery programme that sets out in more detail the interventions/public sector investment that will better ensure the delivery of the Priority Places. (89, 401)
- Section 7.0 must include a statement of the strategic Housing Supply Target and Housing Land Requirement that the Plan is to meet. (89, 401)
- Section 7.0 must include a calculation of the land supply position based on that provided within Annex 2 of the Homes for Scotland submission. (89, 401)
- Schedule 4, and the accompanying LDP settlement plans, must identify land for at least an additional 84 private sector homes within the Inverclyde part of the Renfrewshire SHMA and land for at least an additional 354 private sector homes within the Inverclyde SHMA. (89, 401)
- Schedule 4 and the LDP settlement plans must identify land for public sector homes within the Inverclyde villages. Such land could include sites for private sector homes with 25% of the capacity required to be brought forward as social rented homes. (89, 401)
- The LDP should acknowledge current and projected demographics. (294)
- The Plan must clearly set out the strategic housing land supply target and housing land requirement for the Plan period. (394)
- The Plan must be modified to clearly set out a calculation demonstrating the current housing land supply position. (394)
- The Plan is required to provide a range of sites in order to meet the Housing Land Requirement. (394)
- The housing land section of the Plan is required to set out a range of policies to reflect the above. (394)
- Policy 17 should be significantly modified to establish the housing land supply target and requirement, as well as the policy course to be followed in the event of a shortfall in the HLS – to ensure compliance with SPP. (394)
- Due to the blanket green belt policy coverage on all land outwith settlement boundaries, Policy 17 requires to be amended to include green belt locations, rather than greenfield, to ensure Inverclyde meet the supply of social rented housing as set out in the Proposed Plan. No “greenfield” opportunities exist within the authority area. (394)
- Policy 18 should sit within a clearly defined LDP Housing Land Supply strategy, in compliance with SDP & SPP. (394)
- Inverclyde need to provide a detailed delivery statement for each site in Schedule 4 that demonstrates the sites are effective and deliverable within the programmed time. (394)

- The Proposed Inverclyde Local Development Plan should be amended to include proven deliverable and effective sites to the housing land supply Schedule 4. (394)
- Change 'greenfield' to 'green belt' in relation to the 25% requirement for social rent housing. (394)
- A robust review of the effectiveness of sites included within Schedule 4 is required to assess their effectiveness and suitability as housing land allocations for the forthcoming plan period. (394)
- Allocation of an appropriate amount of housing land to meet requirements within the Renfrewshire Sub-Housing Market Area is necessary and should be added to the appropriate schedules. (394)
- There is a clear need for more land to be released for housing development in the Renfrewshire Sub Housing Market Area for the period to 2024 and 2029. (398)
- Amendment to Policy 17(a) and Policy 18 to replace 'social rent' with 'affordable housing' and the identification of the range of affordable housing as set out within Scottish Planning Policy. (401)
- The Plan should set out the Housing Supply Target and Housing Land Requirement as defined by Clydeplan. (411)
- Release of land is required to make up shortfall in Renfrewshire Sub Housing Market Area. (415)
- In order to comply with Scottish Planning Policy and Policy 8 of Clydeplan, the Proposed Plan requires a fundamental review of the Housing Land section, and amended to identify an adequate supply of effective land for, in particular, private sector housing. (457)
- Include wording to clarify what is meant by 'accelerated delivery'. (472)
- In the interests of clarity, a sufficient hook, with a clear cross reference, should be made to the Affordable Housing in the Inverclyde Villages SG. A footnote could be provided such as:  
"Development proposals must accord with the Affordable Housing in the Inverclyde Villages Supplementary Planning Guidance." (484)
- Suggest the addition of a bullet point (Policy 17) relating to infrastructure and service provision for the site e.g.  
"Evidence of the capacity of existing infrastructure and services to meet the demands created by new development, and the identification of deliverable mitigation measures to address any identified constraints." (556)

#### **Summary of responses (including reasons) by planning authority:**

Affordable housing policy and distribution (89, 120, 294, 343, 394, 401, 457, 398, 484, 560)

The correct geography for the consideration of the affordable housing requirement for Inverclyde is the authority area, and not the housing market areas, which, by definition, relate to private sector housing. Regarding the distribution of affordable housing opportunities, this is largely driven by the Council's knowledge of sites that Registered Social Landlords have an interest in developing.

The Housing Land Technical Report 2018 clearly demonstrates that, in numerical terms, there is sufficient land identified in the Plan to meet the Housing Supply Target and Land Requirement for affordable housing across Inverclyde in the period to 2024. This is demonstrated to be the case whether use is made of the compound or annualised approach (Tables 9 &10). The availability of land is backed by a significant investment in



affordable housing by local and national registered social landlords, as part of the Scottish Government's More Homes Scotland programme. The Council is therefore confident that the affordable housing supply target will be met in the period to 2024.

The Plan's approach has therefore been to remove the requirement for affordable housing from private sector sites that is required in the current adopted Local Development Plan. The reason for this as set out in the Plan (para 7.2) and the Housing Land Technical Report (conclusions section) is, as aforementioned, that the target can be met without this requirement, and that such a requirement is likely to have an impact on the delivery of private homes because (1) it would reduce the capacity for private homes on sites affected by the policy as some of the site would be allocated for affordable housing, and (2) it affects the viability of private sector sites by reducing the return on investment and introducing additional costs associated with negotiations, legal agreements etc.

The Housing Land Technical Report does indicate that there may be a shortfall of housing land for affordable housing in the 2024-2029 period. However, as affordable housing investment programmes tend to be based on the next 3-4 years, a clearer picture on the actual situation will be available as that period approaches, and a decision can be taken then about whether an affordable housing policy is required in the next local development plan (LDP3).

The Council's Local Housing Strategy does refer to continuing with a 25% affordable housing policy. However, the LHS was prepared and approved prior to the Housing Land Technical Report 2018 being prepared, which clearly shows that at an Inverclyde level there is sufficient land to meet affordable housing targets, and the means of delivery are in place to achieve these targets (More Homes Scotland funding).

The Plan does require (through Policies 17 and 18) that 25% of any houses on new greenfield release sites in the Inverclyde villages be available for social rent. It is initially important to clarify that the policies correctly refer to 'greenfield', and that this means greenfield sites both within settlement boundaries and the green belt. The requirement does not apply to brownfield sites so as not to impact on their viability. The specific requirement for social rented houses in the Inverclyde villages is not related to an overall shortfall of this type of housing across Inverclyde. As explained above, there is sufficient land across Inverclyde to meet affordable housing targets, and that is relevant geography to consider this matter on a numbers basis. However, there is a limited supply of social rented housing in the Inverclyde villages, and it would be desirable in terms of mixed communities and offering opportunity, to take advantage of any greenfield development in the villages to address this. However, it is important to note that neither Policy 17 nor 18 indicate that a need for social rented housing is a driver for greenfield development or green belt release in the Inverclyde villages.

For reference, figures provided in September 18 indicate the following number of social rented houses in the Inverclyde villages:

Inverkip – 25

Kilmacolm – 42

Wemyss Bay – 8

It is accepted that the reference and requirement for supplementary guidance on affordable housing in the Inverclyde villages could be strengthened by reference to its title 'Affordable Housing in the Inverclyde Villages' in paragraph 7.2, criterion d) of Policy 17 and in Policy 18. The Council is not opposed to these changes.

### Demographics (294)

The Plan recognises the aging population of Inverclyde in paragraph 7.6, which also encourages particular needs housing, and states such housing will generally be acceptable on general needs housing sites. It is not considered possible, given the current evidence base, for the Plan to include a policy that could intervene in the size of homes to be provided in private sector developments. That is a market driven decision for developers, and whilst the Council could seek to influence the size of homes to be provided through sharing its knowledge of local needs at pre-application discussions, it is not considered that the evidence base is currently strong enough to make a policy intervention on this matter.

### Setting out of Housing Supply Target and Housing Land Requirement (394, 411, 457)

Scottish Planning Policy states in paragraph 115 'They (plans) should set out the housing supply target (separated into affordable and market sector) for each functional housing market area,' and in paragraph 116 'The figure should be increased by a margin of 10 to 20% to establish the housing land requirement'. For the Inverclyde Council area, the development plan comprises the Clydeplan Strategic Development Plan and Inverclyde Local Development Plan. Clydeplan sets out the housing supply target and housing land requirement for the Inverclyde area (for both Council area and Housing Market Area, and affordable and market sectors), explaining that a 15% generosity level has been added to the supply target to provide the land requirement. It is considered that this meets the requirement of Scottish Planning Policy for the development plan to set out the housing supply target and housing land requirement. Inverclyde Council's approach has been to undertake further analysis of housing figures in the Housing Land Technical Report 2018, thus allowing the Plan itself to focus on spatial aspects and policy. The Council considers this approach to be in line with the requirements of Scottish Planning Policy paragraphs 118 and 119 in respect of strategic development plan and local development plan (in city-region) requirements.

### Inverclyde's Housing Supply Target and Housing Land Requirement (89, 394, 398, 401, 415, 457, 467)

The Council acknowledges that its Housing Supply Target is, as per paragraph 115 of Scottish Planning Policy, a policy view of the number of homes the authority has agreed will be delivered in each housing market area over the periods of the development plan. However, it is important to recognise that Inverclyde's Housing Supply Target is ambitious and has been set so as to support the Council's repopulation agenda. The HNDA tool housing estimates for Inverclyde predicted a fall in the number of households in Inverclyde, in the period from 2012 to 2024 of -736 households and the in the period 2024-2029 of -414 households, a total of -1600 households in the period 2012-2029(Productions). Despite this, the Council set positive, and in the context of the HNDA tool estimates, very ambitious Housing Supply Targets in line with historic completion rates. For the 2012-2024 period an all-tenure target of 3150 has been set, differing from the HNDA household change figure by +3,886, and for the 2024-2029 period an all-tenure target of 1,250 has been set, differing from the HNDA household change figure by +2,114. For the 2012 to 2029 period, the difference between the HNDA household change figure and the Housing Supply Target is +6,000 homes.

It is important that the scale of the Council's ambitions in setting its Housing Supply

Targets is seen in the context of a projected significant decrease in households.

### Setting the Housing Supply Target and Housing Land Requirement for the Local Development Plan

Whilst the Housing Supply Target and Housing Land Requirement is established by the Clydeplan Strategic Development Plan, given the length of time between its base year of 2012 and the publication of the Proposed Plan in 2018, it is necessary to bring analysis up to a date closer to the Plan publication date. In doing so, the assumptions behind the HNDA are not amended or challenged and nor are the Housing Supply Target and Housing Land Requirement, but there is up to date data that can be taken into account, primarily housing completions in the period since the HNDA base date and the most up to date housing land supply position.

The Council's position on this matter is clearly set out in the Housing Land Technical Report 2018. This takes account of housing completions in the 2012-2017 period. It also sets out the housing land supply position as per the Proposed Plan, which is based on an adjusted version of the 2017 Housing Land Audit, with all adjustments recorded within the Housing Land Technical Report. The Council can, on request, provide an updated version of the Housing Land Technical Report based on the 2018 housing land audit.

The Housing Land Technical Report acknowledges that two methods of calculating the Housing Land Requirement for Local Development Plans have emerged, and sets out the Council's calculation using both methods. These are known as the 'compound' method and the 'annualised' method. There is no Scottish Government guidance on which method is preferred. Each methodology provides a significantly different perspective on the Housing Land Requirement to be met by the Plan, with the compound method identifying a shortfall of private sector housing land in both the Inverclyde Housing Market Area and Renfrewshire Sub Housing Market Area in the period to 2024, and the annualised method identifying a surplus of private sector housing land in both housing market areas for the same period. For the period 2024-2029, in which the compound method does not apply as there are no completions to take account of, a surplus of private sector housing land is identified in the Inverclyde Housing Market Area and a shortfall of private sector housing land is identified in the Renfrewshire Sub Housing Market Area.

The arguments for and against the compound and annualised approach are well rehearsed. What is important here is whether there are any special Inverclyde features that should be considered. It is argued that there is. The compound approach is based upon any sub-target completions in previous years being made-up in the remaining years of the period under consideration. Comparing annual completions since 2012 with an annualised mean of the Housing Supply Target clearly indicates that the private sector Housing Supply Target has not been met in each year in either housing market area. However, this has to be seen in the context set out above in which ambitious Housing Supply Targets have not been met by a turnaround in the area's population decline. Whilst the Housing Supply Targets have been set to accommodate and encourage repopulation, that population increase has not materialised to populate the houses that would need to be built to meet the Housing Supply Target. Therefore completions have been under target because the population does not exist to support their delivery, despite the land being available for them to be built on. The allocation of additional land to address sub-target completions will not therefore automatically result in increased completions and the fulfilment of the Housing Supply Target for the full period.

### Five year effective land supply (394, 398, 457)

Paragraph 119 of Scottish Planning Policy requires that a minimum of 5 years effective land supply is provided for at all times. The method for calculating this is set out in the Scottish Government's Planning Performance Framework guidance and is:

$$= \left( \frac{\text{5-year effective housing land supply (units)}}{\text{5-year housing supply target (units)}} \right) * 5$$

In the most recent Planning Performance Framework, the Council submitted an all-tenure figure (as required) of 5.9 years effective land supply based upon 5 years of the annualised Housing Supply Target ( $3150/12*5=1315$ , 3150 being the all-tenure Housing Supply Target for Inverclyde for 2012-2024 as set out in Clydeplan) and a 5 year effective housing land supply of 1546 from the finalised 2017 housing land audit, which the Plan is based on.

This calculation is effectively the 'annualised approach' and is set out in the Housing Land Technical Report for the period 2019-2024 (Table 10, covering 5 years from adoption of the Plan), and demonstrates that there is a five year effective land supply for affordable housing across Inverclyde, and for private housing in both housing market areas.

### Effectiveness of Land Supply (394)

Representations have been made in respect of the effectiveness of some of the housing sites identified in the Plan. These are addressed below:

Priority Places – The Council acknowledges that its programming of housing from its Priority Places, when considered accumulatively, is significant. However, on an individual basis, the programming of these sites is reasonable. The Priority Places represent Inverclyde's key regeneration opportunities, and as well as providing housing development opportunities in their own right, their development can address the Council's repopulation priority by improving the overall image of the area through the creation of successful places. Comments on individual sites are offered below. These focus on sites the effectiveness of which has changed in the Housing Land Technical Report, or which are questioned in the representations.

The Harbours, Greenock (Priority Place) – this site sits in the heart of Greenock, adjacent to the town's historic harbours, the newly developed Beacon Arts Centre and the recently restored Custom House. It is considered to be a very attractive residential opportunity, from which the Council only accounts for 60 of its 180 capacity to be developed by 2024. This is not considered to be over-ambitious.

James Watt Dock (east, 359D, r15) – planning permission for the development of 134 flats was issued to River Clyde Homes in 2018. The change in capacity and programming in the Housing Land Technical Report reflects this.

Spango Valley, Greenock (Priority Place) – Spango Valley was first identified for mixed use development including residential in the 2014 Local Development Plan. Interest in housing development in the site remains strong with both site owners making submissions to the Local Development Plan process seeking increased housing capacity on the site (see Issue 1). Once the site's planning status is established by the adoption of the Plan, the development of 120 houses on this site over the following 5 years is not considered

unreasonable.

Inverkip Power Station (Priority Place) – Inverkip Power Station was first identified for mixed use redevelopment in the 2005 Inverclyde Local Plan, then as a major Area of Change in the 2014 Local Development Plan, and subsequently as a Priority Place in the 2018 Proposed Plan. Since its first designation, significant site clearance works have taken place in readiness for development, including demolition of the power stations 800ft high chimney and all other power station buildings. A planning application for the mixed use 'urban village redevelopment of the site, including a residential-led masterplan (Production) was submitted in 2008 and remains live, but the financial crisis of that year, and its ongoing impact on the development industry, halted further progress and delivery. In more recent years, infrastructure (roads) works associated with the development of the site have been identified as one of 20 Glasgow city-region City Deal projects, and work is ongoing to progress that aspect of the development. Scottish Power, the site owner, has held recent discussions with the Council with regard to reviving the planning application. The Council and Scottish Power are both committed to the delivery of this site, which would create an attractive and unique new waterfront residential area for Inverclyde.

Peat Road/Hole Farm, Greenock (Priority Place) – planning applications (18/0127/IC & 18/0128/IC) have been submitted by River Clyde Homes for residential development of this site in April 2018. The joint capacity of both developments is 78 units. This explains the change of tenure for the site and its inclusion in the effective land supply.

Ravenscraig Hospital, Greenock – a planning application for 198 houses was submitted by Link Housing in July 2018 (18/0205/IC). It is understood that Link with a partner RSL is committed to delivering 150 homes for affordable rent with the balance of the remainder to be determined. The Council is keen to see private homes developed within this balance.

Smithy Brae, Kilmacolm – this site was identified as a green belt release in the 2014 Local Development Plan. It is a part greenfield, part brownfield site in the heart of the village. Kilmacolm is a marketable area and the site is considered to make an important contribution to the effective land supply in the Renfrewshire Sub Housing Market Area.

#### Policies 17 and 18 (394, 556)

The Council considers that the Plan sets out a simple and straightforward housing strategy. There are two elements to this. Policy 18 identifies, through Schedule 4 of the Plan, 69 sites for housing development sites with a total capacity of 5576 units (1560 units with an indicative tenure of affordable and 4016 with an indicative tenure of private). These are distributed across the authority area, including the two housing market areas, and include a mix of affordable and private homes opportunities, and brownfield and greenfield sites. The sites range in size from 4 units to 1000+ at James Watt Dock. The Plan includes newly identified housing development opportunities, listed in Schedule 3, which have a total capacity of over 528 units. Policy 17 commits the Council to undertaking an annual audit of housing land to ensure that it maintains a 5 year effective land supply. It also sets out criteria for the assessment of opportunities if additional land is found to be required for housing development. These criteria focus on supporting brownfield sites and the Priority Places and ensuring new opportunities are deliverable. This is a pragmatic approach, and it is not accepted that it constitutes the Council abandoning the plan-led approach and inviting planning by appeal.

It is not considered necessary to add a criterion regarding infrastructure and service



provision capacity to Policy 17, as these matters are covered by other policies of the Plan, and specifically Policy 11 in relation to transport.

### Housing Market Area approach

The Clydeplan Strategic Development Plan and the Inverclyde Local Development Plan, in line with paragraph 111 of Scottish Planning Policy, have taken a housing market area approach to the consideration of housing numbers. The identification of the housing market area was undertaken as part of the Clydeplan preparation process and is explained in detail in Production.

A key point is, that for private sector housing, the correct geography for the consideration of housing supply targets, housing land requirement and housing land supply is the housing market areas being the Inverclyde Housing Market Area and the Renfrewshire Sub Housing Market Area, and the targets, requirement and supply for each must be considered in their own right, and should a shortfall be identified, this should be rectified within the housing market area it is identified for, and not within another.

### Inverclyde Housing Market Area

It is the Council's view that no additional land requires to be identified for housing development within the Inverclyde Housing Market Area. Whilst completions have been below target in this HMA, this is not fundamentally a housing land issue. Land is available, but there has been a slower recovery in confidence in the housing market in this area, which has slowed development coming forward. There is also suppressed demand because whilst the Council has identified repopulation as a priority, a turnaround in population decline has still to be achieved. There has been very limited pressure for additional housing land in the Inverclyde Housing Market Area, and as the Housing Land Technical Report concludes, the Proposed Local Development Plan brings forward all the deliverable and acceptable sites that have been suggested to the Council as part of the Call for Sites exercise. Some of these, and other sites proposed as part of the Proposed Plan consultation, are considered under Issues 6 and 7, with the Council concluding that none of these are acceptable additions to the housing land supply. It is not considered that any of the sites suggested for inclusion in the Plan as a housing development opportunity are any more deliverable than those identified, and the repopulation agenda is more likely to be driven by measures to make Inverclyde a more attractive place to live, than by identifying more land for housing. The Council is addressing this in a number of ways including through significant improvements to its schools and early years' estate, improvements to its town centres' retail offer and environments, and its City Deal projects.

### Renfrewshire Sub-Housing Market Area

There is undoubtedly uncertainty as to whether additional housing land is required in the Renfrewshire Sub Housing Market Area. The Housing Land Technical Report illustrates this by setting out both the annualised and compound methods to comparing the Housing Land Requirement with housing land supply, with the compound method indicating there is a shortfall of housing land in the period to 2024, and the annualised concluding there is not. The Housing Land Technical Report does suggest a requirement for additional housing land in the 2024-2029 period.

It is important to note that Clydeplan does not specifically identify a Housing Supply Target and/or a Housing Land Requirement for the Inverclyde part of the Renfrewshire Sub

Housing Market Area. A housing land requirement is identified for the Inverclyde authority area and for the Inverclyde Housing Market Area. This allows a calculation to be undertaken to identify a requirement for the Inverclyde part of the Renfrewshire Sub-Market Area, but this is not a requirement that is endorsed by Clydeplan. In fact, the housing market area approach suggests that this requirement can be met anywhere in the Renfrewshire Sub Housing Market Area rather than focused in such a small geographic area. The Council did explore this matter with Renfrewshire and East Renfrewshire Councils but their Local Development Plan processes were not at a stage where acceptable opportunities to achieve this could be identified (nb: this statement referred to the non-Inverclyde part of the Renfrewshire Sub Housing Market Area and not to the Inverclyde part as suggested by some representations).

The Council has consistently resisted large scale land release in the Renfrewshire Sub Housing Market Area, recognising the views of the local communities that the impact of such development on the environs and amenity of Kilmacolm and Quarriers Village would be detrimental. This remains the Council's position, and in the context of an uncertain requirement for additional housing land, it is best that the precautionary principle applies and no green belt is lost. The Plan contains Policy 17 which could be used to justify a release should a more certain shortfall position emerge, and a new Plan will be prepared for adoption in 2024 to be prepared in the context of new Housing Need and Demand Context for the Glasgow city-region.

Action Programme/Delivery (89, 401, 394, 472)

The Council accepts that its Action Programme could be more delivery focused and would benefit from having a site-by-site focus. The version of the Action Programme to be published with the adopted plan will reflect this.

The term 'accelerated delivery' was applied to sites which, based on their programming in the 2017 Housing Land Audit, the Council considered could achieve greater output in the period to 2024. The Council will work with the owners of these sites to try to achieve this.

**Reporter's conclusions:**

**Reporter's recommendations:**



<b>Issue 6</b>	<b>Housing Sites in the Inverclyde Housing Market Area - Greenock</b>	
<b>Development plan reference:</b>	Schedule 4, Pages 25-26	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>           Andrew McIntyre (2)            Michael McLoone (3)            William Northveth (11)            Jimi Lafferty (12)            William White (13)            Mr &amp; Mrs Walker (14)            Kayleigh Gillen (15)            Thomas Tracey (16)            Alex Parker (17)            Elaine Traynor (18)            Thomas Traynor (19)            Kerri Molloy (20)            Katie-Jane O'Kane (21)            Nicolas Picozzi (22)            Sandra Wrath (24)            Michael McArthur (25)            Emma McCloy (27)            Michael Bradley (28)            John Livingstone (30)            Nicole Mitchell (32)            Jane Calder (33)            Pauline Daisley (34)            Elizabeth McCafferty (35)            D Sutherland (39)            M Duggie (40)            Mr &amp; Mrs Bowie (41)            Albert Sorrie (42)            Paul Coyle (43)            Richard Dunlop (45)            Carolyn Houten (48)            R Conroy (50)            Martin McGarrity (58)            John Hamill (59)            David Blair (60)            Mr &amp; Mrs Campbell (61)            Lauryn Queen (62)            Lily Curran (63)            John Deafley (64)            Robert Bradley (65)            Paul Bryson (66)            Claire Duffy (67)         </p>		<p>           Gerardine Barron (68)            C Hughes (69)              Christopher Ayliffe (71)            Arjan Kranenbarg (72)            Gerry Stodter (73)            Nathalie Thorburn (74)            Elaine McKerracher (75)            Kathleen Beattie (76)            Greg Cooper (77)            Deborah Bradley (78)            Mr &amp; Mrs Mohan (82)            Mr &amp; Mrs O'Donoghue (83)            A Cumming (84)            Gerald McKay (87)            Mr &amp; Mrs Dillon (88)            Nicola Wilson (97)            George Lappin (98)            David Wagstaff (104)            Mr &amp; Mrs Forbes (111)            Mr &amp; Mrs Purdie (112)            Charon Singh (113)            Patrick O'Donnell (119)            Gerard Hampsey (120)            Michael McTiernan (121)            Gordon Robertson (122)            James McGhee (126)            Norma Wade (127)            Lynn Perkins (128)            Greenock Golf Club (129)            Mark Hourston (130)            Jo Molloy (153)            Mr &amp; Mrs Jackson (154)            Andrew Ross (158)            Gillian Watters (160)            Mr &amp; Mrs Reynolds (163)            G Baynes (164)            Lynda Hainan (165)            Gordon Duffy (166)            S Collins (167)            Craig Collins (168)            Yvonne Chan (169)         </p>

Leo Chan (170)  
 Winnie Chan (171)  
 Ken Chan (172)  
 Josephine Chan (173)  
 Clark Wainwright (174)  
 Gordon Baynes (175)  
 Chris McArthur (176)  
 Ian Smith (177)  
 David Blair (178)  
 Brian Homer (179)  
 Marie McNeill (180)  
 Hugh Spiers (181)  
 Paul Skilling (182)  
 Cameron Shek (183)  
 Iain Smith (184)  
 Sandra Begley (185)  
 Gillian McArthur (186)  
 A McClure (187)  
 Ivor McCauley (188)  
 Brian McCracken (189)  
 John McCracken (190)  
 Kevin McFarlane (191)  
 Thomas McGlone (192)  
 Thomas Buchan (193)  
 Ashley Campbell (194)  
 Ronnie Cooke (195)  
 F Cooke (196)  
 Diane Cooper (197)  
 Andrew Cowan (198)  
 J Cairns (199)  
 J Browne (200)  
 Gemma McLean (201)  
 Alex Skilling (202)  
 W Pollock (203)  
 Jamie Thorburn (204)  
 Catherine Thorburn (205)  
 Barry Anderson (206)  
 Helen Browne (207)  
 Frank Bamford (208)  
 Sharon Bradley (209)  
 Mark Bowker (210)  
 Edith Bowie (211)  
 Mr & Mrs Bowie (212)  
 June Black (213)  
 P McGhee (214)  
 Diane Bryce (215)  
 A Connolly (216)  
 Agnes Sutherland (217)  
 Mr & Mrs Hurrell (218)  
 David Hynes (219)  
 C How (220)  
 Kenneth Beattie (221)

Steven Anderson (222)  
 Ann Boag (223)  
 Andrea Maestri (224)  
 Iain McDonald (225)  
 G Bowie (226)  
 Shaun Rolston (227)  
 Kevin Connolly (228)  
 J Duggie (229)  
 E Harrington (230)  
 David Dalgleish (231)  
 Lesley Dalgleish (232)  
 P Heggie (233)  
 James Hughes (234)  
 Karen McCann (235)  
 S Lynch (236)  
 Stephen Heggie (237)  
 Catherine McDonald (238)  
 M Cairns (239)  
 Liz Ayliffe (240)  
 A Robertson (241)  
 John Campbell (242)  
 Mr & Mrs McEwan (243)  
 Lynn O'Donoghue (244)  
 C McLaughlin (245)  
 Kay Skilling (246)  
 Stephen Heggie (247)  
 Dawn White (248)  
 B McArthur (249)  
 John Donald (250)  
 Maureen McFarlane (251)  
 C McNeil (252)  
 David McGhee (253)  
 Karen Neill (254)  
 R Robertson (255)  
 Caroline Spiers (256)  
 Marie Docherty (257)  
 Clare Cunningham (258)  
 Kathleen Docherty (259)  
 B Kangley (260)  
 Colin McKerracher (261)  
 EA Scullion (262)  
 Brian Watt (263)  
 Mr & Mrs Williamson (264)  
 Craig Mullan (265)  
 Joseph Morgan (266)  
 Brian Ross (267)  
 Rose Middleton (268)  
 Margaret Renfrew (269)  
 RE Robertson (270)  
 Campbell McDonald (271)  
 Robert McNeill (272)  
 Julie Ann Sheridan (273)

J McIntosh (274)  
 Mark Sheridan (275)  
 Michael Hodge (287)  
 Network Rail (288)  
 Gillian McColgan (297)  
 Isabel Campbell (304)  
 Ian Campbell (306)  
 Marion Lappin (307)  
 Myra Holloway (309)  
 Susan Gillespie (310)  
 Duncan MacDougall (312)  
 Donna Welsh (314)  
 R Paton (315)  
 Christopher Forbes (329)  
 Jean Mackenzie (330)  
 Karen McGhee (331)  
 Lewis Forbes (332)  
 Jenna Forbes (333)  
 Cheryl Brown (334)  
 Magdalena Brown (335)  
 Nicola Canney (336)  
 Lavinia McNeill (337)  
 Michelle Johnston (338)  
 Carol Morrison (339)  
 Diane Knox (340)  
 Julie Scott (341)  
 Robyn McLaughlin (380)  
 Robert Beveridge (381)  
 Mr & Mrs Deveney (402)  
 G Woods (404)  
 Andrew Burns (409)  
 Deric Steel (416)  
 M Hunter (428)  
 Gordon Hunter (429)  
 Christopher Robbins (438)  
 Woodland Trust Scotland (460)  
 Mr & Mrs McGhee (471)  
 Scottish Natural Heritage (484)  
 West College Scotland (494)  
 WT Crawford (496)  
 Robert Layton (498)  
 Roy Sharpe (500)  
 Lauramay Hourston (501)  
 Ann Hughes (502)  
 Lorna McDonald (503)  
 Aidan Conway (504)  
 Derek McDonald (505)  
 Stewart McArthur (506)  
 Michael Dyer (507)  
 I MacGillivray (508)  
 Megan Conway (509)  
 Rhonda Conway (510)

Jill Thomson (511)  
 Theresa Scott (512)  
 Stephen Campbell (513)  
 Derek Watters (514)  
 Michelle Fearon (515)  
 Lisa Duffy (516)  
 R Stinson (517)  
 Bryan Carr (518)  
 Liz Steel (519)  
 Mr & Mrs Jamieson (520)  
 Mei Wang (521)  
 Mr & Mrs Dickson (522)  
 K Bryson (523)  
 Blair Ewing (524)  
 Laura Gibson (525)  
 Brenda Bateman (526)  
 Jillian Carr (527)  
 Mrs McDonald (528)  
 Alex Diamond (529)  
 K Fulton (530)  
 M McDade (531)  
 G Holten (532)  
 S Jamieson (533)  
 D Gillan (534)  
 E Anderson (535)  
 K Di Murro (536)  
 B McLean (537)  
 H Queen (538)  
 Julie Sloan (539)  
 C Fleming (540)  
 Kelly Fox (541)  
 F Chan (542)  
 Mr & Mrs Cameron (543)  
 M Deafley (544)  
 A Walker (545)  
 R Johnson (546)  
 Kathy Stewart (547)  
 S Bradley (548)  
 Donna Burns (549)  
 Kincaid Court Residents (563)  
 Jude (564)  
 Robert McNeill (565)  
 Elizabeth MacDougall (566)  
 Anne Kemp (567)  
 A McIlkenny (568)  
 Ann Marie McNally (569)  
 Barbara Cowan (570)

<b>Provision of the development plan to which the issue relates:</b>	New Housing Development (Policy 18)
<b>Planning authority's summary of the representation(s):</b>	
<p><u>Andrew McIntyre (2), Michael Hodge (287), Christopher Robbins (438), Mr &amp; Mrs McGhee (471),</u></p> <ul style="list-style-type: none"> <li>• Objects to/concerned about development at Housing Development Opportunity <b>R23 Renton Road, Greenock</b>. Reasons include: <ul style="list-style-type: none"> <li>➤ Development would reduce property values</li> <li>➤ Negative impact on amenity for existing residents during construction</li> <li>➤ Development would restrict views</li> <li>➤ Development would have a negative impact on wildlife</li> <li>➤ The road (unsure which) is not adopted and is in need of repair</li> <li>➤ The roads are not gritted in the winter</li> <li>➤ Development would increase traffic creating parking and safety issues, including during development</li> <li>➤ Development would create overpopulation</li> <li>➤ New housing would sit above the existing housing in an overbearing and prominent position, impacting existing residents privacy due to overlooking and potentially create overshadowing</li> <li>➤ The Green Belt</li> <li>➤ Parking for the development will negatively impact existing resident amenity</li> <li>➤ The site includes a nature trail</li> <li>➤ There are issues with water pressure and drinking water in the area</li> <li>➤ Planning permission has been denied for this site in the past for valid reasons</li> </ul> </li> </ul> <p><u>Michael McLoone (3), Jimi Lafferty (12), Kayleigh Gillen (15), Thomas Tracey (16), Alex Parker (17), Elaine Traynor (18), Thomas Traynor (19), Nicolas Picozzi (22), Sandra Wrath (24), Emma McCloy (27), Michael Bradley (28), John Livingstone (30), Nicole Mitchell (32), Elizabeth McCafferty (35), Paul Coyle (43), David Blair (60)</u></p> <ul style="list-style-type: none"> <li>• Objects to the designation of Housing Development Opportunity <b>R42 Papermill Road, Greenock</b>. <ul style="list-style-type: none"> <li>• Loss of children's play area <ul style="list-style-type: none"> <li>• longstanding and popular</li> <li>• well kept and safe</li> <li>• local people fought to have redesigned recently</li> <li>• used by local children as well as children from the wider area</li> <li>• proposed new development at Peat Road will increase demand</li> <li>• There are not enough children's play facilities in Greenock and this site is the only fully equipped recreation facility serving the south of Inverclyde.</li> <li>• Removing it is not in line with the Getting It Right For Every Child value and would</li> <li>• Will negatively impact the health and wellbeing of children contrary to current focus on rising levels of childhood obesity.</li> <li>• helps keep kids off the street and younger kids physical and social development</li> </ul> </li> <li>• The open space part of the site is used by the community for events and by</li> </ul> </li> </ul>	

dog walkers and is the only such facility in the area

- Overton is a popular, family friendly child oriented area that needs to be preserved. The area is already saturated with housing and local services are struggling, there is concern about the ability of schools to cope with increased student numbers. There are plenty of previous housing sites in that already have services in place that are more appropriate for housing.
- Development would have a negative impact on existing property values
- Papermill Road is already very busy, this development would exacerbate existing traffic and road safety issues, particularly around school pick up/drop off and walkers using the Greenock Cut. It would also exacerbate parking problems at the site and lead to parking problems in the surrounding area. In view of this, the land at the old water compound could be cleared to make a turning point or car park to alleviate congestion and give residents a place to park when there is snow.
- Bus services in the area are poor and the vehicles poor quality
- Development would be contrary to the Council's Planning Application Advice Note 3 "Private and Public Open Space Provision in New Residential Development" as it would be to the detriment of residential amenity. It would also be Contrary to the Spatial Development Strategy of the Proposed Plan as well as Section 11 Our Natural and Open Spaces
- Development will have a negative impact on local wildlife
- Social housing will lead to an increase in rubbish and flytipping and impact negatively on the environment generally
- Increased safety risk during construction
- Potential allocation of 1 bed flats to undesirable tenants
- Potential for an increase in stray dogs in the area

William Northveth (11), William White (13), Mr & Mrs Walker (14), Thomas Tracey (16), Kerri Molloy (20), Katie-Jane O'Kane (21), Jane Calder (33), Pauline Daisley (34), D Sutherland (39), M Duggie (40), Mr & Mrs Bowie (41), Albert Sorrie (42), Richard Dunlop (45), Carolyn Houten (48), R Conroy (50), Paul Bryson (66), C Hughes (69), Arjan Kranenbarg (72), Deborah Bradley (78), Mr & Mrs Mohan (82), Gerald McKay (87), Mr & Mrs Dillon (88), Nicola Wilson (97), Gerard Hampsey (120), Gordon Robertson (122), Mark Hourston (130), Mr & Mrs Jackson (154), Gillian Watters (160) Gillian McColgan (297), Mr & Mrs Deveney (402), Andrew Burns (409), Deric Steel (416), Roy Sharpe (500), Lauramay Hourston (501), Ann Hughes (502), Lorna McDonald (503), Aidan Conway (504), Derek McDonald (505), Stewart McArthur (506), Michael Dyer (507), I MacGillivray (508), Megan Conway (509), Rhonda Conway (510), Jill Thomson (511), Theresa Scott (512), Stephen Campbell (513), Derek Watters (514), Michelle Fearon (515), Lisa Duffy (516), R Stinson (517), Bryan Carr (518), Liz Steel (519), Mr & Mrs Jamieson (520), Mei Wang (521), Mr & Mrs Dickson (522), K Bryson (523), Blair Ewing (524), Laura Gibson (525), Brenda Bateman (526), Jillian Carr (527), Mrs McDonald (528), Alex Diamond (529), K Fulton (530), M McDade (531), G Holten (532), S Jamieson (533), D Gillan (534), E Anderson (535), K Di Murro (536), B McLean (537), H Queen (538), Julie Sloan (539), C Fleming (540), Kelly Fox (541), F Chan (542), Mr & Mrs Cameron (543), M Deafley (544), A Walker (545), R Johnson (546), Kathy Stewart (547), S Bradley (548), Donna Burns (549), Jude (564), Robert McNeill (565)

- Objects to/concerned about the designation of Housing Development Opportunity **R40 Killochend Drive, Greenock**
  - The scale and design of the development (if it is for 2/3 bed houses and

flats) will be out of keeping with the existing housing

- Killochend Drive is currently quiet and safe for children to play outside; additional traffic and people from the development of this site would threaten this.
- The development contravenes the Council's Planning Application Advice Note 3 "Private and Public Open space Provision in New Residential Development" as it would be to the detriment of existing residential amenity on Killochend Drive, particularly disturbed construction due to noise and traffic. There would be impacts on safe and available on-road parking, views, valuable green space, privacy and a quiet and safe residential environment. Privacy would be impacted due to overlooking for both existing and new residents; there would be loss of light to existing houses due to overshadowing from flats.
- The private playpark could be abused by neighbouring houses. More children will also cause overcrowding and problems with noise and litter.
- Concerned about the impact of development on drainage and ground stability which may increase the flood risk of surrounding properties
- Impact on traffic and road safety both during construction and after due to a lack of space for large construction vehicles and more cars parked on the pavement forcing pedestrians to walk on the road, particularly with the number of children who walk to school and play in the area who would no longer be able to play on the street
- Difficulty accessing the site during adverse weather would create parking problems in Killochend Drive
- The access to the site is narrow and there may not be space for a 2 lane road and pavements either side with suitable visibility splays as the fence and planting at the entrance are owned by the residents of Killochend Drive
- Development will negatively impact access for emergency vehicles
- Access to Killochend Drive is privately maintained, development will lead to increased degradation of the road surface
- Negative impact of development on house values
- The area is already saturated with housing and local services are already struggling. Development will Increase strain on local schools – following redevelopment, St Patricks was said to be sized to fit with no plans for increased housing stock.
- Development at Broomhill and Hole Farm is replacing former housing that had been demolished and these areas are better suited for housing. There is no need for the disruption this development would cause when other already serviced sites are available. These other developments also mean there is no need for this site to be developed.
- Development would have an adverse impact on existing green areas, trees and wildlife e.g. deer, birds and trees
- The land is not fit for development in its present state
- Development will set a precedent for further development in the area
- Objections to affordable housing
  - Not right to build affordable housing directly across the street from private housing, not the case in other areas with similar house prices and council tax rates.
  - Proposal would exacerbate current ongoing anti-social issues.
  - Social housing will adversely impact on the value of existing private homes.

- A lot of new social housing has been or will be built in Broomhill so there is no need for any at this location.
- All the properties at Killochend Drive and Dresling Road are privately owned and low density, high density affordable housing does not seem logical.
- Concerned flats could be used as scatter flats in the future
- If the houses are housing association there is a potential for increase vandalism, gangs, drug use and lack of care for their surroundings which could lead to safety issues for current residents

Michael McArthur (25), M Duggie (40), Albert Sorrie (42), Martin McGarrity (58), John Hamill (59), David Blair (60), Mr & Mrs Campbell (61), Lauryn Queen (62), John Deafley (64), Robert Bradley (65), Claire Duffy (67), Christopher Ayliffe (71), Gerry Stodter (73), Nathalie Thorburn (74), Elaine McKerracher (75), Kathleen Beattie (76), Greg Cooper (77), Gerard Hampsey (120), Gordon Robertson (122), G Baynes (164), Lynda Hainan (165), Gordon Duffy (166), S Collins (167), Craig Collins (168), Yvonne Chan (169), Leo Chan (170), Winnie Chan (171), Ken Chan (172), Josephine Chan (173), Clark Wainwright (174), Gordon Baynes (175), Chris McArthur (176), Ian Smith (177), David Blair (178), Brian Homer (179), Marie McNeill (180), Hugh Spiers (181), Paul Skilling (182), Cameron Shek (183), Iain Smith (184), Sandra Begley (185), Gillian McArthur (186), A McClure (187), Ivor McCauley (188), Brian McCracken (189), John McCracken (190), Kevin McFarlane (191), Thomas McGlone (192), Thomas Buchan (193), Ashley Campbell (194), Ronnie Cooke (195), F Cooke (196), Diane Cooper (197), Andrew Cowan (198), J Cairns (199), J Browne (200), Gemma McLean (201), Alex Skilling (202), W Pollock (203), Jamie Thorburn (204), Catherine Thorburn (205), Barry Anderson (206), Helen Browne (207), Frank Bamford (208), Sharon Bradley (209), Mark Bowker (210), Edith Bowie (211), Mr & Mrs Bowie (212), June Black (213), P McGhee (214), Diane Bryce (215), A Connolly (216), Agnes Sutherland (217), Mr & Mrs Hurrell (218), David Hynes (219), C How (220), Kenneth Beattie (221), Steven Anderson (222), Ann Boag (223), Andrea Maestri (224), Iain McDonald (225), G Bowie (226), Shaun Rolston (227), Kevin Connolly (228), J Duggie (229), E Harrington (230), David Dalgleish (231), Lesley Dalgleish (232), P Heggie (233), James Hughes (234), Karen McCann (235), S Lynch (236), Stephen Heggie (237), Catherine McDonald (238), M Cairns (239), Liz Ayliffe (240), A Robertson (241), John Campbell (242), Mr & Mrs McEwan (243), Lynn O'Donoghue (244), C McLaughlin (245), Kay Skilling (246), Stephen Heggie (247), Dawn White (248), B McArthur (249), John Donald (250), Maureen McFarlane (251), C McNeil (252), David McGhee (253), Karen Neill (254), R Robertson (255), Caroline Spiers (256), Marie Docherty (257), Clare Cunningham (258), Kathleen Docherty (259), B Kangley (260), Colin McKerracher (261), EA Scullion (262), Brian Watt (263), Mr & Mrs Williamson (264), Craig Mullan (265), Joseph Morgan (266), Brian Ross (267), Rose Middleton (268), Margaret Renfrew (269), RE Robertson (270), Campbell McDonald (271), Robert McNeill (272), Julie Ann Sheridan (273), J McIntosh (274), Mark Sheridan (275), Robert Beveridge (381), Anne Kemp (567), A McIlkenny (568), Ann Marie McNally (569), Barbara Cowan (570)

- Objects to/concerned about the designation of Housing Development Opportunity **R43 Peat Road/Hole Farm, Greenock**
- NB 2 planning applications for 78 flats and houses were also being consulted on during the Proposed Plan consultation and many of the responses are regarding these proposals
  - Objections to affordable housing:
    - Concerned about proposals to build 78 flats and houses, the last few



years have been so much better since the tenement flats at Peat Road/Hole Farm were demolished and this proposal could increase anti-social behaviour. Would be less concerned if proposals were for private housing.

- The Council wishes to encourage people into the area, this is well located site for schools and the train line and should be developed by a private developer. Development for social housing will instead encourage people to move out.
- Not in keeping or right to build affordable housing across from private housing where the tenants would pay less council tax, not the case in other areas with similar house prices and council tax rates.
- Social housing will lead to an increase in rubbish and flytipping and impact negatively on the environment generally
- Development does not appear to be for family housing and with the social issues that have pervaded this area in the past is this a case of moving a problem rather than solving it, 1 bed flats could be let to undesirable tenants who would pose a risk to children
- There are already vacant 1 and 2 bed properties similar to those proposed in nearby areas
- Development would be contrary to the Council's Planning Application Advice Note 3 "Private and Public Open Space Provision in New Residential Developments" as it would be detrimental to existing residential amenity due to:
  - the height of the buildings causing a loss of privacy due to overlooking and overshadowing;
  - being accessed through neighbouring estates;
  - the loss of an area that has returned to nature and is used as open space by surrounding residents e.g. dog walking. It should not therefore be considered brownfield
- The development will have a negative impact on existing property values and house sales.
- Development will make traffic congestion worse and negatively impact road safety
- Development will have a negative impact on the wildlife on the site
- Pressure on schools and nurseries with increased pupil numbers
- There are many other more appropriate brownfield sites available that redevelopment would improve
- Potential for an increase in stray dogs in the area
- With all the demolitions recently in the surrounding area, where is the demand for these new homes
- The proposal constitutes overdevelopment

Lily Curran (63), David Wagstaff (104), Michael McTiernan (121), Mr & Mrs Reynolds (163)

- Objects to the designation of Housing Development Opportunity **R20 Ratho/MacDougall Street, Greenock**
  - Removal of the autism centre
  - Closure of existing small firms
  - Ample other vacant sites available
  - Increase in traffic adding to existing congestion and creating road safety issues, particularly at the junction of Ratho Street and Carwood Street

- Negative environmental impact of more traffic generated by development
- This proposal would create overdevelopment
- Area is included in the Local Development Plan for industrial use which is much needed in the area
- East Hamilton Street, adjacent to MacDougall Street is prone to flooding
- There appears to be a restriction on entry to Carlsdyke station to the south entrance on Bawhirley Road

Gerardine Barron (68)

- Objects to the designation of Housing Development Opportunity **R39 Lyle Road (former Holy Cross Sch.)**, Greenock
- Development will lead to increased traffic, which will add to existing parking problems and road safety issues in the area and could lead to anti-social behaviour.

Mr & Mrs O'Donoghue (83)

- Objects to the designation of Housing Development Opportunity **R22 Cardross Crescent** (former King's Glen School), Greenock
  - The access road is too narrow and in a state of disrepair
  - The entrance to the school was supposed to be blocked off to protect against noise pollution

A Cumming (84), George Lappin (98), Mr & Mrs Forbes (111), Mr & Mrs Purdie (112), Patrick O'Donnell (119), James McGhee (126), Norma Wade (127), Lynn Perkins (128), Andrew Ross (158), Isabel Campbell (304), Ian Campbell (306), Marion Lappin (307), Myra Holloway (309), Susan Gillespie (310), Duncan MacDougall (312), Donna Welsh (314), R Paton (315), Christopher Forbes (329), Jean Mackenzie (330), Karen McGhee (331), Lewis Forbes (332), Jenna Forbes (333), Cheryl Brown (334), Magdalena Brown (335), Nicola Canney (336), Lavinia McNeill (337), Michelle Johnston (338), Carol Morrison (339), Diane Knox (340), Julie Scott (341), Robyn McLaughlin (380), G Woods (404), M Hunter (428), Gordon Hunter (429), WT Crawford (496), Robert Layton (498), Elizabeth MacDougall (566)

- Objects to/concerned about the designation of Housing Development Opportunity **R47 Ravenscraig Hospital**, Greenock
  - It is in an area that already suffers some of the worst inequalities in Inverclyde. Social housing will compound these problems and risks increasing crime rates
  - The site was chosen to concentrate the mentally ill and poor in an enclosed, isolated setting away from the rest of the community and therefore is not a suitable setting for housing.
  - The surrounding infrastructure is already struggling due to the overdevelopment of the area making it unsuitable for any type of housing but particularly social housing
  - If private developers found this site unsuitable for private homeowners it should be unacceptable to suggest it is suitable for social tenants.
  - The development is constrained within the footprint of the former buildings and sits level to a busy trunk road with no amenities nearby which is not conducive to wellbeing.
  - The site is infested with Japanese Knotweed and contains asbestos
  - The area has significant cultural and historical value that should be considered,

including the B listed Ravenscraig Hospital building.

- The site is covered by a Tree Protection Order and is the last easily accessible wildlife corridor in the South West of Greenock, providing a habitat for many protected species and serving as a lung for the neighbouring communities, protecting them from carbon emissions.
- The site has been used for generations by the public to access the Greenock Cut
- The pollution caused by the development of the site would cause environmental damage and destroy the habitat of many species.
- We should expand the social housing stock but this should provide the best possible homes in the best possible environment, which this is not. Research into where these areas are (not isolated, near town centres, away from traffic, accessible for those with disabilities, near education and employment opportunities and public transport, including shops), which as a major influence on health and wellbeing has been ignored.
- The proposal lacks any impact assessment on the community it plans to establish or the existing wider settled community
- Public funds have been used to further this development prior to its inclusion in the Local Development Plan with no notice given to residents in the surrounding area
- This development will add traffic to the already very busy and dangerous A78
- There are many other sites available that have infrastructure available that are in better locations
- Development would result in the loss of an area of greenspace
- Greenock has a reducing population therefore the proposed housing is not necessary
- The chairman of the planning board is also a director of Link Housing Association who are developing the site. This is a conflict of interest
- There is already overprovision of social rented stock
- Schools and GPs practices are already full

#### Charon Singh (113)

- Change the designation of Killochend Drive (R40) from affordable to private and the capacity from 16 to 33 as in the adopted Local Development Plan to maximise flexibility and ability to successfully develop the site.

#### Greenock Golf Club (129)

- Object to our submission at Lyle Road being omitted from the Proposed Plan 2018.
- Aware that the plan seeks to avoid building on open space but all our land falls into this category we have no option but to try and dispose of the land adjacent to Craig's Farm on Lyle Road. The area involved is 1 hectare which is less than 0.5% of our overall 235 hectares of open space. This relatively negligible loss could potentially realise a sum that would enable us to re-invest in our golf course and Club.
- If the site is included in the Plan we would pursue it vigorously with the intent of a speedy resolution and would officially withdraw our Forsyth Street proposal.

#### Jo Molloy (153)

- Enquiring about a small piece of land adjacent to Housing Development Opportunity R50 Auchmead Road (former Ravenscraig Sch) that does not seem to have been included in the site boundary. Since the school closed this has become increasingly

overgrown with the fencing in disrepair and becoming dangerous. Concerned that if it is not within the development boundary the situation will only become worse with no-one accountable for its maintenance.

#### Network Rail (288)

- The reference in the Proposed Development Site Assessment Report 2018 to the need for a road bridge over the railway to Housing Development Opportunity R47 Ravenscraig Hospital, Greenock if the site is to accommodate over 200 units should be included in Schedule 4 or the accompanying text. Developers should be made aware of this constraint and the requirement to discuss developer contributions/deliverability costs and to engage early in the design and construction process to avoid disruption to rail services and assets.

#### Woodland Trust Scotland (460)

- Area of woodland on the eastern boundary of Housing Development Opportunity R22 Cardross Crescent (former King's Glen Sch), Greenock should be considered ancient woodland and protected. The eastern boundary is also adjacent to a Local Nature Conservation Site, therefore we recommend that a buffer is put in place between it and the site boundary to ensure any disturbance is kept to a minimum
- A site specific developer requirement should be introduced for Housing Development Opportunity R43 Peat Road/Hole Farm, Greenock, that the area of native woodland that falls within the site allocation is retained and enhanced with additional native woodland planting, strategically planned to improve the overall woodland connectivity for that area.

#### Scottish Natural Heritage (484)

- Note that Housing Development Opportunity R42 Papermill Road, Greenock is an elevated and relatively prominent site and recommend it is removed from the Proposed Plan in line with the clarification statement issued by the Council.
- Note that the Plan identifies Housing Development Opportunity R45 Upper Bow as an area of established housing and recommend it is removed from the Proposed Plan in line with the clarification statement issued by the Council.
- Housing Development Opportunity R46 Merlin Lane, Greenock is located adjacent to an expansive area of open space which should be maximised and incorporated in the development design, ensuring integration with the surrounding development through a developer requirement.

#### West College Scotland (494)

- Object to the exclusion of our Finnart Street campus site from Schedule 4. This site is suitable for housing and the College's proposed relocation could release this site for development including housing
- Object to the exclusion of our Waterfront Campus site from Schedule 4 This site is suitable for housing and the College's proposed relocation could release this site for development including housing

#### Kincaid Court Residents (563)

- Would like to raise severe concerns about the proposed development at Housing Development Opportunity site R20 Ratho/MacDougall Street, Greenock
- Ratho Street and the junctions with East Hamilton Street and Carwood Street are busy throughout the day, the development would create additional traffic adding to congestion and with negative impacts on road safety and the environment
- Will result in the loss of the Autism Centre

#### Modifications sought by those submitting representations:

- Remove site R23 Renton Road, Greenock from the Proposed Plan (2) (438) (471)
- Remove Housing Development Opportunity site R42 Papermill Road, Greenock from Schedule 4 and maintain as a recreation site (3) (12) (15) (16) (17) (18) (19) (22) (24) (27) (28) (30) (32) (35) (43)
- Remove Housing Development Opportunity site R42 Papermill Road, Greenock from the Proposed Plan in line with the clarification statement issued by the Council (484)
- Remove affordable housing/housing development opportunity site R40 **Killochend Drive**, Greenock from the Proposed Plan (11) (13) (14) (16) (20) (21) (33) (34) (39) (40) (41) (42) (48) (50) (66) (69) (72) (78) (82) (87) (88) (97) (120) (122) (130) (154) (160) (297) (402) (409) (416) (500) (501) (502) (503) (504) (505) (506) (507) (508) (509) (510) (511) (512) (513) (514) (515) (516) (517) (518) (519) (520) (521) (522) (523) (524) (525) (526) (527) (528) (529) (530) (531) (532) (533) (534) (535) (536) (537) (538) (539) (540) (541) (542) (543) (544) (545) (546) (547) (548) (549) (564) (565)
- Change the tenure of **Killochend Drive**, Greenock (R40) from affordable to private and change the capacity from 16 to 33 (113)
- Change the tenure of R43 **Peat Road/Hole Farm**, Greenock from affordable to private (25) (62) (77) (381)
- Remove site R43 **Peat Road/Hole Farm**, Greenock from Schedule 4 (40) (42) (59) (61) (64) (65) (67) (71) (73) (74) (120) (122) (164) (165) (166) (167) (168) (169) (170) (171) (172) (173) (174) (175) (176) (177) (178) (179) (180) (181) (182) (183) (184) (185) (186) (187) (188) (189) (190) (191) (192) (193) (194) (195) (196) (197) (198) (199) (200) (201) (202) (203) (204) (205) (206) (207) (208) (209) (210) (211) (212) (213) (214) (215) (216) (217) (218) (219) (220) (221) (222) (223) (224) (225) (226) (227) (228) (229) (230) (231) (232) (233) (234) (235) (236) (237) (238) (239) (240) (241) (242) (243) (244) (245) (246) (247) (248) (249) (250) (251) (252) (253) (254) (255) (256) (257) (258) (259) (260) (261) (262) (263) (264) (265) (266) (267) (268) (269) (270) (271) (272) (273) (274) (275) (567) (568) (569) (570)
- Ensure the flats at R43 **Peat Road** do not overlook neighbouring properties (58)
- A site specific developer requirement should be introduced for Housing Development Opportunity R43 **Peat Road/Hole Farm**, Greenock, that the area of native woodland that falls within the site allocation is retained and enhanced with additional native woodland planting, strategically planned to improve the overall woodland connectivity for that area (460)
- Want assurances that Cardross Crescent will be blocked off for both public and car access to the proposed development at R22 **Cardross Crescent** (former King's Glen School), Greenock (83)
- Remove Housing Development Opportunity R47 **Ravensraig Hospital**, Greenock from the Proposed Plan (84) (98) (111) (112) (126) (127) (128) (158) (380) (404) (428) (496) (498) (566)
- Remove R47 **Ravensraig Hospital**, Greenock as a Housing Development Opportunity and preserve it as a public park (304) (306) (307) (309) (310) (312) (314) (315) (329) (330) (331) (332) (333) (334) (335) (336) (337) (338) (339) (340) (341)

- An environmental study should be carried out to safeguard the wildlife at Housing Development Opportunity R47 Ravenscraig Hospital, Greenock (119)
- The conservation area at Rankin Park should be extended to include the grounds at Housing Development Opportunity R47 Ravenscraig Hospital (98)
- Give Housing Development Opportunity site R47 Ravenscraig Hospital, Greenock to Clyde Muirshiel Regional Park and form it into “Smithton Memorial Park” (98)
- Include the site at **Lyle Road** (049 in the Main Issues Report) in the Local Development Plan for housing (129)
- Modify text at paragraph 7.2 to read  
“The Housing Land Technical Report 2018 sets out the Council’s interpretation of housing need and demand, its Housing Supply Targets and Housing Land Requirement. In addition the “Proposed Development Site Assessment Report 2018” sets out an assessment of sites including opportunities, constraints and deliverability. Both documents have informed the Council’s decision that this Plan requires to identify additional land for private housing at the locations identified in Schedule 3, and to accelerate delivery of housing on some existing housing opportunity sites, identified in Schedule 4. In addition, the Technical Report concludes...” (288)
- A buffer zone should be established between the eastern boundary of Housing Development Opportunity site R22 **Cardross Crescent** (former King’s Glen School), Greenock and the Local Nature Conservation Site to the east of the site (460)
- Remove Housing Development Opportunity site R45 **Upper Bow**, Greenock from the Proposed Plan in line with the clarification statement issued by the Council (484)
- The following developer requirement should be included in the Local Development Plan 2 in relation to Housing Development Opportunity R46 Merlin Lane, Greenock  
“The western edge of the site where it adjoins the area of greenspace must incorporate appropriate landscaping. SUDs could be incorporated within the space but must help provide a well-designed solution for this important site edge. Housing along this edge must be designed to overlook the park. Rear fences backing on the park will not be acceptable.” (484)
- Schedule 4 should be amended to include the West College Scotland sites at **Finnart Street** and the **Waterfront** as Housing Development Opportunity sites with an indicative capacity of 140 units and 65 units respectively. (494)
- Remove Housing Development Opportunity site R20 Ratho/MacDougall Street from the Proposed Plan (63) (163)
- Reduce the capacity of Housing Development Opportunity site R20 Ratho/MacDougall Street (121)
- Remove Housing Development Opportunity R39 Lyle Road (former Holy Cross Sch) from the Proposed Plan (68)

#### Summary of responses (including reasons) by planning authority:

##### Renton Road, Greenock (R23)

- This site is identified as a residential development opportunity in the adopted Local Development Plan and in the 2005 Local Plan. It sits in an elevated position to the south of Greenock, bounded by Luss Avenue, Renton Road and Dalmoak Road. It consists of an area of steeply sloping grass and shrubs, with a flatter area on the southernmost part adjacent to Scottish Water infrastructure. An application for 31 houses on the western part of the site was approved in 2006 and another for 7 houses on the norther part of the site, along Renton Road, was approved in 2012. The western part of the site was also included in the Strategic Housing Investment Programme



between 2012 and 2015, but has not been included since.

- The Council notes that there concerns about the impact of development at this site on property values and views, however it does not consider these as material considerations in relation to whether the site should be identified for development in the Local Development Plan.
- While concerns about the detrimental effects development could/would have on the existing development, residential amenity and safety of residents are noted, in the absence of any supporting evidence this can only be considered conjecture and therefore not a planning matter.
- While concerns about the detrimental effects of development of this site on traffic and road safety are noted, the Council's Roads Service have not identified traffic or road safety issues that would preclude the development of the site as set out in the Proposed Plan.
- The impact of development on wildlife and residential amenity and the presence of a nature trail are considerations that will be addressed at the planning application stage through avoidance of important areas or technical and design and layout solutions.
- Issues with water pressure and drinking water are noted but are not material as to the inclusion of the site in the Local Development Plan as they are considered to be matters that can be resolved at the development stage.
- Housing is considered to be an appropriate use for the site, compatible with its location in the residential area.
- Planning applications for housing have also been approved on the site in the past. Any future application will be considered on its merits and determined accordingly.
- Consultation with other Council departments and external agencies does not suggest any constraints on the ability of the wider area to accommodate the additional population associated with the development of the site.
- The adoption, repair and gritting of roads is an issue for the Council's Roads Service and is not a planning matter.
- It is considered that there are no changes in circumstances that should result in the removal of the opportunity from the development plan and that no modification should be made in relation to this matter.

#### Papermill Road, Greenock (R42)

- The site comprises a children's play area and grass football pitches on the north side of Papermill Road. The site was included in the Strategic Housing Investment Plan in 2016 and 2017. It was thereafter carried into the Proposed Plan in error as the site is not considered suitable for housing development as it would involve the loss of open space, sports pitches and a play area. A clarification statement to this effect was published during the Proposed Plan consultation period. This site is currently leased to the Council, which has no plans to enable housing development on the site. The reporter is therefore invited to remove the reference to R42 Papermill Road, Greenock in Schedule 4 and from the Proposals Map.

#### Killochend Drive, Greenock R40

- The site is identified as a residential development opportunity in the adopted Local Development Plan. It sits to the urban edge, south of and accessed from Killochend Drive. It consists of an area of steeply sloping grass and shrubs and includes a path giving access to the greenbelt. An application for 10 townhouses was approved in 2006,

while a further application for 31 flats was refused in 2011 and dismissed at the subsequent appeal in 2012. The site has been included in the Strategic Housing Investment Programme since 2012 with the exception of 2013.

- The scale and design of development, impact on wildlife, residential amenity, ground stability and flood risk are considerations that will be addressed at the planning application stage through avoidance of affected areas or technical solutions.
- While concerns about the detrimental effects development could/would have on the existing development, residential amenity and safety of residents are noted, in the absence of any supporting evidence this can only be considered conjecture and therefore not a planning matter.
- While concerns about the detrimental effects of development of this site on traffic and road safety are noted, the Council's Roads Service identified no traffic or road safety issues that would preclude the development of the site as set out in the Proposed Plan. The appeal against refusal of permission for housing in 2012 also found no issue with access to the site.
- While the Council notes that there are concerns about the impact of development at this site on property values and road surfaces, it does not consider these as material considerations in relation to whether the site should be identified for development in the Local Development Plan.
- Consultation with the Council's Education department did not identify school capacity as a constraint to the development of the site.
- The Council is required to identify a generous supply of land to meet the Housing Land Requirement set out in the Strategic Development Plan. This site is felt to be suitable to meet this requirement.
- The tenure and capacity set out in Schedule 4 are indicative and does not preclude the development of Killochend Drive for private housing. Actual site capacity will be determined by a design-led approach.
- It is considered that there are no changes in circumstances that should result in the removal of the opportunity from the development plan and that no modification should be made in relation to this matter.

#### Peat Road/Hole Farm, Greenock (R43)

- The site is identified as a Major Area of Change and a residential development opportunity in the adopted Local Development Plan and as a New Neighbourhood and housing opportunity in the 2005 Local Plan. It comprises a 16.4 hectare former housing area to the west of Peat Road and south of the Glasgow to Wemyss Bay rail line in Greenock. It is within the residential area and is identified in the Proposed Plan as a Priority Place due to its scale and potential to contribute to the regeneration of this part of Greenock. It slopes down to the north and is covered by unmaintained grass and scrubland, and some hardstanding from previous development.
- While concerns about the detrimental effects affordable housing development could/would have on the amenity and safety of existing residents and the environment of the area are noted, in the absence of any supporting evidence this can only be considered conjecture and therefore not a planning matter.
- As the site was previously developed and still contains infrastructure such as roads, paths and lighting, it fits the definition of brownfield.
- The acceptability of the detailed design of the development of the site, including the provision of open space and number of units, will be assessed as part of the determination of the planning applications that are currently under consideration (refer

application numbers).

- While the Council notes that there are concerns about the impact of development at this site on property values, it does not consider this as material considerations in relation to whether the site should be identified for development in the Local Development Plan.
- While concerns about the detrimental effects of development of this site on traffic and road safety are noted, the Council's Roads Service identified no traffic or road safety issues that would preclude the development of the site as set out in the Proposed Plan.
- Consultation with the Council's Education department did not identify school capacity as a constraint to the development of the site.
- The Council is required to identify a generous supply of land to meet the Housing Land Requirement set out in the Strategic Development Plan. This site is felt to be suitable to help meet this requirement.
- The protection of the ancient woodland is a matter that can be considered as part of the Supplementary Guidance on Priority Places (See Issue 1).
- It is considered that there are no changes in circumstances that should result in the removal of the opportunity from the development plan and that no modification should be made in relation to this matter.

#### Ratho/MacDougall Street, Greenock (R20)

- The site is identified as a business and industrial area in the adopted Local Development Plan. It comprises an area of partly vacant industrial land bounded by MacDougall Street, Ratho Street, the A8 and the Glasgow to Gourock rail line, and sits adjacent to Carthage station in Greenock. Land to the west and south is residential in character, while to the east lies industrial land. James Watt Dock lies to the north beyond the A8.
- While concerns about the detrimental effects of development of this site on traffic and road safety are noted, the Council's Roads Service identified no traffic or road safety issues that would preclude the development of the site as set out in the Proposed Plan.
- The Council is required to identify a generous supply of land to meet the Housing Land Requirement set out in the Strategic Development Plan. This site is felt to be suitable to help meet this requirement.
- The scale of development proposed is in keeping with density levels in the surrounding area. The capacity in Schedule 4 is indicative and the actual capacity will be determined through a design-led approach.
- The impact of development on the environment and flooding are considerations that will be addressed at the planning application stage through avoidance of important areas or technical and design and layout solutions.
- It is not considered that development of this site will have any impact on the southern entrance to Carthage Station from Bawthorpie Road.
- It is considered that existing uses on the site can be relocated to alternative premises/sites within Inverclyde.
- It is not considered that any modification to the Plan is required in relation to this matter.

#### Lyle Road (former Holy Cross School), Greenock (R39)

- The site is identified as an area of open space in the adopted Local Development Plan. It comprises the cleared area of the former Holy Cross School on Lyle Road, Greenock. It sits on the top of the hill near the junction with Grieve Road. The site slopes down to the south west and is within the residential area.

- The site is considered to offer a brownfield housing development opportunity in a marketable area.
- The site was the subject of the current Local Development Plan Examination (Issue 7.3).
- While concerns about the detrimental effects of development of this site on traffic and road safety are noted, the Council's Roads Service identified no traffic or road safety issues that would preclude the development of the site as set out in the Proposed Plan.
- It is not considered that any modification to the Plan is required in relation to this matter.

#### Cardross Crescent, Greenock (R22)

- The site is identified as a residential development opportunity in the adopted Local Development Plan. It comprises the cleared area of the former King's Glen Primary School, part of which has been developed as a children's home. It sits to the north of and below Kilmacolm Road within the residential area and on the settlement edge to the east. There is a Local Nature Conservation Site within the greenbelt adjacent to the east and the site is accessed from the west via Cardross Crescent.
- Access to the site and potential noise issues are considerations that will be addressed at the planning application stage through technical and design solutions.
- A development brief will be drawn up for this site that will include the need for a buffer zone between the site boundary and the Local Nature Conservation Area to the east.
- It is considered that there are no changes in circumstances that should result in the removal of the opportunity from the development plan and that no modification should be made in relation to this matter.

#### Ravenscraig Hospital, Greenock (R47)

- The site is identified as a residential development opportunity in the adopted Local Development Plan and in the 2005 Local Plan. It comprises the now vacant Ravenscraig Hospital buildings, including the B listed Ravenscraig Hospital and a number of modern additions, as well as an area of open space to the east and north. It sits south of the A78 and Glasgow to Wemyss Bay railway, between Pennyfern Road and Branchton Road and is accessed by a road bridge over the rail line from the A78 and from Branchton Road. The majority of the site is covered by a Tree Protection Order and it sits directly adjacent to the Clyde Murisheil Regional Park to the south. An application for the demolition of the hospital was approved in 2017 and an application for the development of the site for 198 houses is pending (refer planning application number).
- While concerns about the detrimental effects affordable development could/would have on inequality and crime are noted, in the absence of any supporting evidence this can only be considered conjecture and therefore not a relevant planning matter.
- The site is included as a housing development opportunity in the adopted Local Development Plan and was also included in the previous Local Plan, the principle of the site as suitable for housing development is therefore long established. Although the site could potentially be suitable for other uses, it sits within the residential area and will help the Council meet the Housing Land Requirement set out in the Strategic Development Plan through contributing to the provision of a generous land supply. There is also a more than sufficient land supply of business and industrial land and no other alternative use has been suggested.

- Consultation with other Council departments and external agencies does not suggest any constraints on the ability of the wider area to accommodate the additional population associated with the development of the site.
- The viability of housing sites is assessed differently for private and affordable housing markets and changes over time, therefore a site being considered currently unsuitable for private housing does not mean it is not a suitable housing site.
- It is normal practice for sites such as Ravenscraig Hospital, where there are large areas of greenspace within the site, for development to be largely contained within the footprint of the pre-existing developed area in order to maximise the reuse of utilities and protect established open and green spaces.
- The site is within walking distance of Branchton station and a number of bus services run along Inverkip Road giving access to Greenock town centre and further afield.
- The treatment/removal of Japanese Knotweed, asbestos or other any contamination will be required to be undertaken as part of any planning permission issued.
- The Ravenscraig Hospital building has been assessed by Historic Environment Scotland, who have agreed that it is beyond practical repair and can be demolished as per application 17/0025/LB.
- Areas of cultural or historical importance, as well as impact on the Tree Protection Order and wildlife and habitats and access to the Greenock Cut are considerations that can be addressed at the planning application stage through technical and layout and design solutions.
- Transport Scotland has indicated that there are no capacity issues on the A78 and that development proposals can be assessed on a site by site basis. This would consider both the volume of traffic and improvements required to improve site access, if required.
- A development brief will be drawn up for this site that will seek to limit development to the previously developed areas and retain the existing areas of greenspace, trees/woodland and landscape, as well as retaining access to them. It will also advise that if the site is to be developed for more than 200 houses a new road bridge over the railway will be required.
- One of the three strategic priorities set out in the Inverclyde Outcomes Improvement Plan is to stabilise Inverclyde's population and ensure Inverclyde is conducive to longer term growth. To help achieve this, the Local Development Plan identifies a generous supply of land to ensure that land supply is not a constraint on new development and growth. This site forms part of that generous supply.
- The Housing Supply Targets for affordable housing in Inverclyde identify the need for 1,500 new affordable homes between 2012 and 2029.
- It is considered that there are no changes in circumstances that should result in the removal of the opportunity from the development plan and that no modification should be made in relation to this matter.

#### Lyle Road, Greenock (Greenock Golf Club)

- The site comprises part of Greenock Golf Course, which is currently identified as open space. It lies adjacent to Lyle Road, between existing housing at Golf Place and Craig's Farm.
- The site was assessed in the Proposed Development Site Assessment, which was published as a background report to the Proposed Plan. This identified that development would result in a loss of open space and habitat with no corresponding proposals to show how these impacts would be mitigated. The development was also considered speculative, with no evidence that if it were allocated it would form part of



the effective housing land supply and it was therefore not included as a housing development opportunity. No new information as to how these issues would be addressed has been provided and therefore it is not considered that any modification to the Plan should be made in relation to this matter.

#### Auchmead Road, Greenock (former Ravenscraig School)

- The site is identified as a residential development opportunity in the adopted Local Development Plan. It comprises the cleared site of the former Ravenscraig Primary School and an adjacent Council office which is now overgrown. Access is from Auchmead Road and Burns Road. It is within the residential area, adjacent to the A78.
- This issue relating to the area of ground not included in the development site is being investigated as part of the current planning application for this site.

#### Upper Bow, Greenock (R45)

- The site as shown in the Proposed Plan comprises an area of existing housing between Davey Street and Tweed Street. Mapping for the site boundary was derived from the Strategic Housing Investment Plan 2017, which highlighted this area as a development site, instead of the correct site which sits within site R44. The correct mapping is shown in Production. A clarification statement to this effect was published during the Proposed Plan consultation period. The Reporter is therefore invited to change the boundaries of R44 Bow Farm and R45 Upper Bow, Greenock on the Proposals Map to reflect this.

#### Merlin Lane, Greenock (R46)

- The site comprises land previously occupied by flats to the west of Merlin Lane in Greenock. It is adjacent to an area of open space that serves the surrounding housing.
- The development at Merlin Lane is currently underway and near completion. It is not therefore appropriate to include a developer requirement in relation to this site and it is not considered that any modification to the Plan is required in relation to this matter.

#### Finnart Street, Greenock (West College Scotland Campus) (494)

- The site comprises the existing 1.6 hectare college campus that sits between Finnart Street, Newton Street and Nelson Street in Greenock. It is within Greenock Town Centre, within walking distance of Greenock West station. The area to the west of the site is predominantly residential and includes Greenock West End Conservation Area.
- This site was not submitted as a potential housing development opportunity through the call for sites, nor at the Main Issues Report stage, and therefore was not considered for inclusion in the Proposed Plan.
- The site is within the town centre and therefore use of the site for housing is acceptable in principle. However, there is no evidence, and sufficient uncertainty, to suggest that the site would be available for housing development during the timeframe of the new Local Development Plan, therefore it is not considered that a modification to the Plan should be made in relation to this matter.

#### Customhouse Way, Greenock (West College Scotland Waterfront Campus) (494)

- The site comprises the existing West of Scotland College campus that sits between Customhouse Way to the south and the River Clyde to the north. It is within Greenock



Town Centre, between the Waterfront leisure centre to the west and Custom House to the east.

- This site was not submitted as a potential housing development opportunity through the call for sites, nor at the Main Issues Report stage, and therefore was not considered for inclusion in the Proposed Plan. The site is within the town centre and therefore use of the site for housing is acceptable in principle. However, there is no evidence, and sufficient uncertainty, to suggest that the site would be available for housing development during the timeframe of the new Local Development Plan, therefore it is not considered that a modification to the Plan should be made in relation to this matter.

<b>Reporter's conclusions:</b>
<b>Reporter's recommendations:</b>

<b>Issue 7</b>	Housing sites in Inverclyde HMA - Gourock, Port Glasgow and Inverkip	
<b>Development plan reference:</b>	Section 7.0, Pages 21-27	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Fiona Kane (1) Audrey Coyle (4) Lynne Shaw (23) Dawn Robertson (26) Brian McMillan (36) Jennifer Johnson (37) Jean Rough (46) Kirsty Graham (47) Margaret Higgins (49) Karen Currie (52) Alexander Johnstone (55) Mary Purdie (70) Sandra De La Mare (85) Brian McBain (86) Fiona Burnett (91) Peter Hamilton (92) Sheila Hamilton (94) Catherine Sutherland (110) Graeme Russell (114) Paul Kirkwood (131) Pamela Watt (132) Tracy Archibald (133) Colin Campbell (134) Jennifer Campbell (135) Rose McMillan (138) John Lowe (139) Amy Carruthers (145) Mr and Mrs Gray (146) Martin McFadden (148) Iain Bannister (149) Barbara Jones (151) Arlene McCulloch (155) Rick Finc Associates for Michael Scott (161) Paul Carradice (162) Mary Rennie (280) Agnes Sharp (281) Geddes Consulting for Miller Homes Ltd (283) Claire Scott (284) Stuart McMillan MSP (286) John Brown (289) Marie Black (292)	James Smith (296) John Clark (300) Stuart Bell (323) McInally Associates Ltd for Peel Land and Property (343) Ismay McPherson (346) Jennifer Hutchinson (347) Karen E Dickson (355) Renee Steel (357) Kirsty O'Donnell (364) Roslyn Stevenson (365) Marc McFarlane (390) M Woods (395) Inverdunning Ltd (396) Alan Crawford (403) Jim Bruce (405) Lorna Martin (407) Mr and Mrs McNeil (412) Eleanor O'Brien (414) William Oliver (422) Ian Cook (442) Malcolm Sinclair (445) Woodland Trust Scotland (460) Nadine Delussey (463) Craig McGhee (464) Amy Louise Shelton (476) Mr and Mrs Williams (483) Scottish Natural Heritage (484) Port Glasgow West Community Council (492) Mary McCracken (497) Mr and Mrs Perry (550) Leanne Bryceland (554)	

<b>Provision of the development plan to which the issue relates:</b>	New Housing Development (Policy 18) Schedule 3: New Private Housing Development Opportunity sites, Schedule 4: Housing Development Opportunity sites,
<b>Planning authority's summary of the representation(s):</b>	
<p><u>Audrey Coyle (4)</u></p> <ul style="list-style-type: none"> <li>Concern that development of the R1 Slaemuir site, specifically along Teviot Rd, will result in a loss of privacy, daylight, garden space/wall and outlook.</li> </ul> <p><u>Fiona Kane (1) Lynne Shaw (23) Paul Kirkwood (131) Agnes Sharp (281) Stuart McMillan MSP (286) Lorna Martin (407) William Oliver (422) Mr and Mrs Perry (550)</u></p> <ul style="list-style-type: none"> <li>Object to/concerned about the R58 development opportunity at Kirn Drive in Gourrock. Reasons include: <ul style="list-style-type: none"> <li>➤ Increased traffic flow and congestion on Kirn Drive, during the construction and developed phases, will exacerbate existing traffic issues along this road, pose a safety risk to residents and delay emergency services.</li> <li>➤ No additional capacity has been put in place to facilitate the traffic flow from existing developments in Gourrock. There is also no petrol station or spare capacity at the Gourrock station car park. Additional housing in Gourrock is pushing the boundaries of what could be considered responsible urban development.</li> <li>➤ Schools and local health services are at or near capacity.</li> <li>➤ Adverse impact on the privacy of neighbouring areas due to new development overlooking existing properties and the close proximity of new roads</li> <li>➤ Increased noise, disturbance and traffic, including from construction activities and proximity of new roads within new development</li> <li>➤ Loss of greenspace, including woodland and grassed areas.</li> <li>➤ Adverse impact on wildlife within the site</li> <li>➤ Adverse impact on the drainage of neighbouring properties</li> <li>➤ Potential adverse impact on the property values of surrounding properties</li> <li>➤ There are many other suitable housing sites in the Plan, the purpose of which is to provide affordable housing.</li> </ul> </li> </ul> <p><u>Dawn Robertson (26) Brian McMillan (36) Jennifer Johnson (37) Jean Rough (46) Kirsty Graham (47) Margaret Higgins (49) Karen Currie (52) Alexander Johnstone (55) Mary Purdie (70) Sandra De La Mare (85) Brian McBain (86) Fiona Burnett (91) Peter Hamilton (92) Sheila Hamilton (94) Catherine Sutherland (110) Graeme Russell (114) Pamela Watt (132) Tracy Archibald (133) Colin Campbell (134) Jennifer Campbell (135) Rose McMillan (138) John Lowe (139) Amy Carruthers (145) Mr and Mrs Gray (146) Martin McFadden (148) Iain Bannister (149) Barbara Jones (151) Arlene McCulloch (155) Paul Carradice (162) Mary Rennie (280) Claire Scott (284) John Brown (289) Marie Black (292) James Smith (296) Stuart Bell (323) Ismay McPherson (346) Jennifer Hutchinson (347) Karen E Dickson (355) Renee Steel (357) Kirsty O'Donnell (364) Roslyn Stevenson (365) Marc McFarlane (390) M Woods (395) Alan Crawford (403) Jim Bruce (405) Mr and Mrs McNeil (412) Eleanor O'Brien (414) Ian Cook (442) Malcom Sinclair (445) Nadine Delussey (463) Craig McGhee (464) Amy Louise Shelton (476) Mr and Mrs Williams (483) Mary McCracken (497) Leanne Bryceland (554)</u></p> <ul style="list-style-type: none"> <li>Object to/concerns about the R56 Weymouth Crescent development opportunity in</li> </ul>	

Gourock. Reasons include:

- This site has never been identified for residential development.
- Affordable housing is not appropriate in the middle of a private estate; would have a negative effect on property values; be detrimental to the area, adversely affect the amenity and safety of residents; and could result in anti-social/criminal behaviour.
- Weymouth Crescent is already an extremely busy through road
- Increased traffic flow and congestion will pose a safety risk to residents; make access into and out of the area more difficult for residents, public transport and emergency services. It will also further degrade the local road network, which is already in an unacceptable state of disrepair.
- A new access/junction/through road will impact the traffic dynamic and safety of residents.
- Development will exacerbate the existing lack of parking provision, thereby compromising the safety of residents, and the ability of private cars, public transport, and emergency services to get access through the area.
- Development will cause overcrowding in an already over developed area
- The area is lacking in amenities, including recreational facilities for children/families/the elderly.
- Adverse impact on local schools and GP practices
- Construction activities would increase pollution, disturbance and the safety risk to residents
- Development will result in a loss of privacy for existing and new residents through development overlooking and as a result of traffic on the additional road and access points.
- Increased noise and disturbance, e.g. through additional traffic, increased population and affordable housing issues
- Loss of view for neighbouring properties
- Loss of a long standing greenspace area and associated amenity within a highly developed area
- Brownfield sites, including former industrial sites, should take precedence over Greenbelt/Greenfield sites
- Adverse impacts on wildlife, including known bat roosts in the former Water Station building.
- Potential increase in flood risk due to disturbance of the reservoir
- There is no requirement for affordable housing on this site as there are sufficient homes in the estate, there is already an overprovision of social housing, there are significant voids in existing affordable housing developments, and other development opportunities identified in the Plan should enable Inverclyde Council's to meet its housing targets.
- Existing housing sites are not being developed
- There are larger vacant sites within Inverclyde which could be earmarked for development
- The proposed development is not in line with some of the LDP's objectives
- Three previous planning applications on this site have been rejected due to numerous objections by residents, which should be taken into consideration.
- My comments to previous planning applications, 11/0211/IC and 12/0067/IC, should be taken into account.

Rick Finc Associates for Michael Scott (161)

- Request that the former Langlands Park School site on Port Glasgow Road (see map

included with representation), which is identified as open space in the Plan, be re-designated as a housing development opportunity. Reasons include:

- This is not a high quality open space. It is a brownfield site which retains remnants of the former school use (e.g. hardstanding areas) is under used and not easily accessed on foot. There is also evidence of fly tipping and anti-social behaviour on the site
- Apart from small areas of high/medium surface water flood risk, the site is relatively free of constraints.
- While trees have popped up in recent years, none are covered by a TPO.
- Inverclyde Council has a housing land deficit.
- Allocating this site would provide a suitable, sustainable and logical release for housing and contribute to meeting housing land targets.

#### Geddes Consulting for Miller Homes Ltd (283)

- Object to the deletion of the site identified as R2 Arran Avenue, Park Farm in the current Local Development and request the site be identified in the LDP as a residential development opportunity for 115 houses. Reasons include:
  - While the site was deleted from the Proposed Plan due to their being no prospect of development viability, the removal of the affordable housing policy requirement for the Inverclyde Housing sub market area (HSMA) has made the site viable.
  - There is a requirement for further housing land allocations in both the Inverclyde HSMA and the Renfrewshire (Part) HSMA.
  - Representation includes a Development Framework Report and Site Effectiveness Statement.

#### Stuart McMillan MSP (286)

- While the R7 Industrial Estate, Dubbs Road site could be beneficial in turning a brownfield site into something positive, development should have no negative impact on the working industrial estate, while the safety of new residents must be a priority. Traffic measures could make the industrial estate safer for all.
- Welcome the R3 Woodhall (Phases 4 and 5) development opportunity.

#### John Clark (300)

- Support the decision not to include Berfern, Inverkip (Call for Sites Ref: 045) in the Plan.

#### McInally Associates Ltd for Peel Land and Property (343)

- Object to the site (identified in Appendix 1 of the representation) being designated as Open Space in the LDP and request that it be re-designated as a residential development opportunity in the LDP. Reasons include:
  - It has historically been zoned as a development site and is identified as a Residential Development Opportunity site (r13) in the current LDP.
  - The site is bounded by recent residential development to the south and east, which has progressed as intended and improved the urban landscape of the area. The site therefore represents an opportunity to complete the development of the remaining brownfield land.
  - The overall residential development at Kingston Dock already has a significant area

of managed open space, including walkways, children's play area, parkland and planted areas.

- Development is required to maintain the economic viability of the site
- Changing the designation of this site at this late stage does not encourage confidence on other long term regeneration projects.
- The site is an effective housing site and continues to be of significant interest to housebuilders.

#### Inverdunning Ltd (396)

- Wish to express our continued interest and preparation work on the development of the R58 Kirn Drive site in Gourrock. We have developed a balanced set of design proposals (included in the representation), which have been informed by engagement with Gourrock Community Council, Inverclyde Council's Planning, Roads and Property services, SNH and Scottish Water. Our proposals include the widening of Kirn Drive.

#### Woodland Trust Scotland (460)

- Some of the R54 Ashburn Gate site overlaps with the woodland area covered by a TPO. The allocation site should be restricted to the brownfield part of the site and a buffer zone established between the woodland and the development.
- The R58 Kirn Drive site includes areas of semi-natural woodland and is adjacent to an area of ancient woodland to the south. Recommend that tree loss is kept to a minimum, that site boundaries are assessed to avoid tree loss in the south of the site, and appropriate buffer zones are established. There is also an excellent opportunity for enhancement of this woodland to improve habitat connectivity and provide landscaping for the development.
- Object to the R59 Cowal View site as it appears to be covered in native woodland, as identified on the NWSS, and development would result in the loss of precious resource. Recommend that the site be protected by a TPO.
- With regard to R62 The Glebe, recommend that existing trees are retained around the cemetery for screening, while additional native planting should be requested to provide screening and offer high quality greenspace.

#### Scottish Natural Heritage (484)

- R54 Ashburn Gate - the large area of semi-natural woodland (approx. 40%) within the site needs considered and incorporated into any future development proposals.
- R55 1 Ashton Road - there is an area of semi-natural woodland within the south west corner, which needs to be considered and incorporated into any future development proposals.
- R58 Kirn Drive site – There are areas of woodland habitat and parts of the Burneven SINC within the site, the direct loss of which is likely to cause further indirect impacts, including changes to woodland structure, displacement of species and habitat and changes to hydrology. The site also includes a strip of land along the southern edge of Kirn Drive. Habitat loss, habitat fragmentation and the thinning of this corridor should be avoided. We consider that the potential impacts on the woodland habitat require further consideration.
- We welcome the opportunity to input into the production of associated Supplementary Guidance which is relevant to our interests.
- R59 Cowal View - site is sloping and relatively prominent. Development proposals



should demonstrate appropriate siting, design and any mitigation measures.

- The area of semi-natural woodland within the R59 Cowal View site should be considered and incorporated into any future development proposals.

#### Port Glasgow West Community Council (492)

- While the R7 Industrial Estate, Dubbs Road site would provide a welcome clean-up of the area, an additional 200 cars on an already congested Glenhuntly Road would not be welcome.
- A relief road could help alleviate congestion in this area.

#### **Modifications sought by those submitting representations:**

- R58 Kirn Drive:
  - Restrict development to the eastern end of Kirn Drive (1)
  - Remove the site (23) (131) (281) (550)
  - Consult with residents and investigate traffic capacity of surrounding streets before considering this proposal (286)
  - Review site boundaries to keep tree loss to a minimum. Require tree survey and additional native planting (460)
  - The LDP should require developer to provide an Extended Phase 1 Habitat Survey along with appropriate protected species surveys. (484)
  - Development proposals must include appropriate information to understand the extent of direct and indirect impacts on the woodland habitat network, SINCE and ancient woodland resource, including hydrological impacts and any mitigation measures. (484)
- R56 Weymouth Crescent:
  - Remove the site (37) (46) (52) (55) (70) (85) (86) (91) (92) (94) (110) (131) (132) (133) (134) (135) (138) (139) (145) (146) (148) (149) (151) (162) (280) (284) (289) (296) (323) (346) (347) (355) (357) (364) (365) (390) (395) (403) (405) (414) (422) (445) (463) (464) (476) (483) (497) (554)
  - Proposal should be thoroughly reconsidered (26)
  - Remove the site or change tenure to private housing (36)
  - Remove the affordable housing tenure (47) (114) (155) (412)
  - Utilise this site as a children's play area (403) (442) (463) (554) or to provide landscaping (403), a shop (463) or a park (292) (554)
- R54 Ashburn Gate:
  - The woodland area covered by the TPO should be excluded from the site. (460)
  - Development must be restricted to the brownfield part of the site and appropriate setbacks in line with BS5387 Trees in Relation to Construction (484).
- R55 1 Ashton Road:
  - development must be restricted to the brownfield part of the site with appropriate setbacks in line with BS5387 Trees in Relation to Construction (484).
- R59 Cowal View:
  - Site should be removed from the Plan and protected under a TPO. (460)
  - Development proposals must demonstrate appropriate siting, design and any mitigation measures, along with appropriate setbacks in line with BS5387 Trees in Relation to Construction (484).

- R62 The Glebe - existing trees should be retained and additional native trees planted to provide screening and enhance the site greenspace quality. (460)
- Remove the open space designation from the former Langlands Park School site on Port Glasgow Road (see map in representation) and identify the site as a residential development opportunity. (161)
- Modify Schedule 4 and the Proposals Map to identify the Arran Avenue, Park Farm site for 115 private houses. Site identified on page 11 of the Development Framework submitted as part of the representation (283)
- Identify the site at the former Kingston Dock, Port Glasgow (shown in Appendix 1 of the representation) in Schedule 4 of the Plan. (343)

#### **Summary of responses (including reasons) by planning authority:**

##### Matters relevant to this issue dealt with in other Schedule 4s

Matters relating to housing supply targets, housing land requirement and housing land supply are dealt with under Issue 5.

A potential relief road for the A8 is dealt with under Issue 3.

##### Slaemuir, Port Glasgow

This is a 2.9ha brownfield site located in a residential area within the southern boundary of Port Glasgow. The site was previously developed for affordable housing and associated car parking/landscaping. The overall site is comprised of six smaller sites, which are located at Campsie Road, Cullins Avenue, Slaemuir Avenue, Grampian Road and Teviot Road. Two planning applications for a total of 16 residential units are currently pending on the Teviot Road part of the site.

The Council notes the concern that development of this site, specifically along Teviot Rd, will result in a loss of privacy, daylight, garden space/wall and outlook. Impacts on privacy, daylight and existing garden ground will largely depend on the layout and design of the development, which are not known at this stage. These matters will be fully assessed at the planning application stage, specifically under Policy 1 – Creating Successful Places, which requires all development proposals to give consideration to the factors set out in Figure 3, which includes “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”.

It is considered that a modification to the Plan is not required in relation to this matter.

##### Weymouth Crescent, Gourrock

This is a privately owned 0.3ha site located between Bournemouth Rd and Weymouth Crescent in Gourrock. It is comprised of a vacant building and an area of brownfield land within the western part, with a sloping grassed area to the east. The site was previously used as a Scottish Water yard and treatment plant. The site has been the subject of several planning applications in the last 20 years, including a 1997 retrospective

application for the building and setting up of railway layouts (approved), a 2011 application for 10 residential units (withdrawn), a 2012 application for 10 residential units (approved) and a 2013 application for 8 residential units (approved). The site was identified as a 'residential area' in the 2005 Local Plan, with this designation carried forward into the current 2014 LDP. In 2017, Oak Tree Housing Association expressed an interest in developing the site for affordable housing and subsequently added it to the Strategic Housing Implementation Programme (SHIP) 2017. The site was included in Table 7 of the Main Issues Report (Review of other potential additional housing sites) and subsequently included as a residential development opportunity, for 10 affordable units, in Schedule 4 of the LDP due to its inclusion in the SHIP and also to enable a pro-active planning approach to be taken to a long standing vacant site within a housing estate.

The Council acknowledges the significant number of objections and concerns that this development opportunity has raised.

While the site has not previously been allocated as a housing site, it is considered that the principle of residential development has been established through a 2012 planning permission for 10 residential units, and a 2013 planning permission for 8 residential units, both unimplemented. The site was also identified as a 'residential area' in the 2005 Local Plan and the current 2014 Local Development Plan.

The Council notes the concerns expressed about the detrimental effects affordable housing could/would have on existing residents and the area in general. However, no supporting evidence has been submitted to substantiate these views, which must therefore be considered conjecture and not a valid reason to modify the Plan.

While the Council notes the concerns expressed about the impact of development on property values and views, it is established planning practice that property values and views are not material considerations in planning decisions.

With regard to impacts on traffic flow, congestion, parking, access, road safety and the condition of the local road network, the Council notes that the Roads Service did not object to the 2012 planning application for 10 residential units (approved) or a 2013 planning application for 8 residential units (approved). In addition, the Roads Service did not raise any concerns about this site during consultation on the Proposed Plan. Furthermore, the design of any new junctions/accesses and through roads will be assessed at the planning application stage, when detailed proposals are put forward. The required level and design of parking provision on this site will also be determined at the planning application stage, in line with the Council's parking standards, which are based on the National Roads Development Guide.

In relation to the capacity of local amenities and services to support development on this site, a range of Council services were consulted on the Proposed Plan, including those with responsibility for open space and recreation, and education. No concerns were raised about the capacity of existing amenities or services to support the level of development identified on this site. The Council is also not aware of any capacity issues at local GP practices. It should also be noted that if, during the assessment of a planning application, a clear and appropriate need arises directly from the development of the site, developer contributions can be sought to provide additional service provision.

Impacts on privacy, safety and residential amenity will be fully assessed at the development management stage, specifically under Policy 1 – Creating Successful

Places, which requires all development proposals to give consideration to the factors set out in Figure 3, which includes “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.....(and)....Avoid creating spaces that are unsafe... ”.

While the Council notes the concerns about loss of greenspace, it is considered that the site has limited amenity or ecological value. The site is privately owned, largely fenced off, with no formal right of access to, or use of the site for recreational purposes established through the LDP (i.e. it is not designated as open space). The site also has limited visual amenity as it includes a vacant building and an area of hardstanding. While the eastern part of the site is grassed, it not considered to have any significant ecological value.

The Council notes that bat roosts have been, and may currently be present in the former Water station building. As bats are a ‘protected species’, any potential impacts on them will be assessed at the development management stage, specifically under Policy 33 – Biodiversity and Geodiversity of the Plan (paragraph 2).

In relation to concerns about development of greenbelt/greenfield land, the site is located within a residential area, not the green belt. While the eastern part of the site is greenfield, it is considered to have limited amenity or ecological value. Development of the greenfield area is also considered necessary to make the redevelopment of the whole site, which includes brownfield land, viable.

The Council considers that development of this site for affordable housing aligns with the LDP’s overall aim to “contribute towards Inverclyde being an attractive and inclusive place to live, work, study, visit and invest, now and in the future, particularly through encouraging investment and new development which is sustainably designed and located and contributes to the creation of successful places”. It is also considered that the R56 site aligns with the Sustainable Development Strategy and the Spatial Development Strategy, which underpin the aim of the Plan.

With regard to flood risk, SEPA’s consultation response to the Proposed Plan did not identify any flood risk or request a Flood Risk Assessment.

In relation to occupancy rates of existing affordable housing developments, this is the responsibility of the relevant registered social landlords, and therefore not a planning matter.

Comments submitted to previous planning applications relate to specific and detailed development proposals which are no longer under consideration. It is considered that such comments would most appropriately be submitted to a future planning application on this site.

It is considered that no modifications to the Plan are required in relation to these matters.

#### Kirn Drive, Gourock

This 5.3ha site sits on an elevated plateau immediately to the south of Kirn Drive in Gourock. It is bound by Larkfield Road to the east, Earnhill Road to the South and residential gardens to the east. Residential development is proposed on the eastern and western parts of the site, which are connected by a narrow strip of woodland along the

northern boundary. The eastern part is largely comprised of brownfield land that was previously used as blaes football pitches, with an area of semi-natural woodland (part of Burneven Local Nature Conservation Area) to the south. The eastern part is greenfield and largely characterised by scrubland.

The Council notes the concerns about existing traffic load and congestion along Kirn Drive and the potential for further development to exacerbate this. During the preparation of the LDP, Council officers from the Roads and Planning Services met with the site promoter to discuss how the additional traffic generated by new development could be accommodated. It was concluded that developer contributions would be required to upgrade Kirn Drive, with the details of this to be identified through a transport feasibility study. The requirement for this road upgrade will be identified in a Development Brief, which will be included in Supplementary Guidance.

With regard to the provision of additional road capacity for traffic generated from existing developments in Gourrock, this is a matter for the Local Transport Strategy. The Local Development Plan can only address transport related issues that arise as a direct result of new development.

In relation to the capacity of local services and amenities to support development on this site, a range of Council services were consulted on the Proposed Plan, including those with responsibility for open space and recreation, and education. No concerns were raised about this site. It should also be noted that if, during the assessment of a future planning application, a clear and appropriate need arises directly from the development of the site, developer contributions can be sought to provide additional service provision.

Impacts on privacy and residential amenity will be fully assessed at the development management stage, specifically under Policy 1 – Creating Successful Places, which requires all development proposals must give consideration to the factors set out in Figure 3, which includes “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”.

With regard to concerns about the loss of greenspace, it is considered that this site forms a relatively small area of the informal greenspace to the south of Kirn Drive. In addition, the Development Brief for this site will require the existing path between Kirn Drive and Earnhill Road to be upgraded, thereby enhancing access to greenspace.

In relation to impacts on wildlife, woodland/trees and the Burneven LNCS, the developer will be required to undertake a Tree Survey, an Extended Phase 1Habitat Survey, an appropriate protected species survey, and provide the information necessary to fully understand the extent of direct and indirect impacts on the woodland network, LNCS and ancient woodland resource. These requirements will be identified in a Development Brief for the site, which will be included in the Supplementary Guidance on Development Briefs. This will inform the layout and design of future development proposals and the assessment of any future planning application, specifically against Policy 34 – Trees, Woodland and Forestry and Supplementary Guidance on Trees and Development.

Any potential impacts on the drainage of neighbouring properties will be identified and addressed at the development management stage, specifically through Policy 7 – Surface and Waste Water Drainage, which requires development proposals to demonstrate that both surface water and waste water can be appropriately drained.



While the Council notes the concerns expressed about the impact of development on property values, it is established planning practice that property values are not material considerations in planning decisions.

SNH's input on the R58 development opportunities is appreciated and the offer of further input on the preparation of associated Supplementary Guidance relevant to R58 welcomed.

Support for the R58 development opportunity is noted.

#### Former Langlands Park School site, Port Glasgow

The site identified in the representation lies between Glasgow Road and High Carnegie Road in Port Glasgow and was formally home to Langlands Park School. While some elements of its former use remain, such as areas of hardstanding, boundary walls and footsteps, the site is now characterised by woodland, with SNH's Semi-Natural Woodland Inventory identifying the site as part of a wider semi-natural woodland area extending to the south and west. The site is designated as open space in the LDP as it provides access to and through a woodland area. It would be inappropriate to re-designate this site for residential development as this would remove an area of open space and result in the loss of semi-natural woodland and the fragmentation of a wider woodland area, thereby reducing habitat connectivity. In addition, this site has not been subject to public consultation through the Main Issues Report or the Proposed Plan.

It is considered that a modification to the Plan is not required in relation to this matter.

#### Arran Avenue, Port Glasgow

This is a 5.8ha greenfield site located on sloping and prominent ground in the greenbelt adjacent to the eastern boundary of Port Glasgow. While the site is identified as a residential development opportunity (r2) in the current LDP, it was not carried forward into the Proposed Plan due to a lack of development viability and adverse impacts on the Midhill Plantation/ Castlehill Plantation Local Nature Conservation Site (the site is wholly within the LNCS), urban form and local landscape. While the removal of an affordable housing requirement may increase the sites viability, the Council considers that the site should no longer be identified for development due to ongoing lack of confidence regarding the effectiveness of the site and the adverse impacts identified.

It is considered that a modification to the Plan is not required in relation to this matter.

#### Industrial Estate, Dubbs Road, Port Glasgow

This is a 4.9ha brownfield site in the eastern part of Port Glasgow Industrial Estate, which lies within the southern boundary of Port Glasgow. The site is comprised of vacant and derelict buildings, the majority of which have not been in use for a significant period of time.

It is considered that development of this site will have a positive impact on the wider industrial estate by removing a number of longstanding vacant and derelict buildings.

The safety of new residents will be fully addressed at the development management



stage, specifically under Policy 1 – Creating Successful Places, which requires all development proposals to give consideration to the factors set out in Figure 3, which includes “avoid creating places that are unsafe or likely to encourage or facilitate anti-social behaviour or crime”.

The Council’s Roads Service did not object or raise any significant concerns about the additional traffic that would be generated by this development opportunity.

It is considered that no modifications to the Plan are required in relation to these matters.

#### Kingston Dock, Port Glasgow

The site identified in the representation is an area of re-naturalised brownfield land adjacent to the recently developed Kingston Dock housing area.

#### Ashburn Gate, Gourock

This is a 0.2ha site located at the end of Ashburn Gate, which is accessed off Albert Road in Gourock. The site is comprised of an existing building formerly used as a care home, with an area of semi-natural woodland to the rear.

The Council notes that a significant area of semi-natural woodland, identified as a TPO, is included within the R54 boundary. While this woodland area is on a very steep slope to the south east of the existing building and, as such, unlikely to be developable, any impact on the TPO will be assessed at the development management stage, specifically through Policy 34 – Trees, Woodland and Forestry and Supplementary Guidance on Trees and Development.

Requirements for buffer zones between woodland and development will be set out in the Supplementary Guidance on Trees and Development, which is currently being prepared.

It is considered that modifications to the Plan are not required in relation to these matters.

#### Ashton Road, Gourock

This is a 0.1ha vacant site located on the corner of Ashton Road and Ashton Place in Gourock. It was previously used as a hotel, which was demolished following a 2016 planning permission for the erection of 11 flats.

The Council notes the area of semi-natural woodland within the south west of the site. Any impact on this woodland will be assessed at the development management stage, specifically through Policy 34 – Trees, Woodland and Forestry and Supplementary Guidance on Trees and Development.

#### Cowal View, Gourock

This is 0.5ha greenfield site located on sloping and relatively prominent ground between Gourock Golf Club and Cowal View in Gourock. Planning permission for 16 residential units was granted in 2017.

While the majority of this site continues to be identified as native woodland by the Forestry Commission, the woodland was removed prior to the 2017 planning application,

and development of the site has now commenced.

It is considered that a modification to the Plan is not required in relation to this matter.

The Glebe, Inverkip

This is a 1.4ha greenfield site located between Langhouse Road and Millhouse Road in Inverkip. The site is largely characterised by scrubland with some trees along its south eastern boundary.

A development brief will be prepared for this site and included in the Supplementary Guidance on Development Briefs. This will include requirements for existing boundary trees to be retained and consideration given to the provision of additional native planting can be requested to provide landscaping and offer high quality greenspace.

It is considered that a modification to the Plan is not required in relation to this matter.

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>Issue 8</b>	<b>Housing Sites in the Renfrewshire Sub Housing Market Area</b>	
<b>Development plan reference:</b>	Section 7.0 Our Homes and Communities, Pages 21-27	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Diane Jeavons (38) Peter Jeavons (44) David Baker (80) SEPA (93) Graham Clark (96) Mr & Mrs Hargreaves (100) Richard Creek (102) Jane Cunningham (106) Graham Pottinger (108) Tom McGhee (115) Christine Haddock (117) Stephen Ross (123) Colin McFarlane (125) Alasdair Keith (137) James McCulloch (141) Doreen Craig (143) Lesley Smith (150) David Marshall (276) Alan Green (278) Rhona MacKay (282) Liam McMillan (290) Mr & Mrs Burns (293) Margaret Scaife (298) Charles Mills (321) Colleen Wood (342) Gill McColl (345) Philip Craig (352) Michael Bowles (356) Sally McCulloch (361) Lesley McMillan (363) Gail Beckett (378) Julie Ballantyne (387) Mike Closier (400) Helen Anderson (406) Oliver Schofield (413) Brian Cassidy (420) Lynne Knott (424) Louise Welsh (427) W McCarthy (431) Carrie White (435) Alison Winter (449)		
Graham Keith (79) Robin Lee (90) Edmund Graham (95) John Patton (99) John Anderson (101) Andrew Taylor (103) Robin Watson (107) David Walker (109) Ruth Keir (116) Graham Haddock (118) Allyson Ross (124) Mary Carvill (136) David Wharton (140) Ernest Martin (142) Jennifer Schofield (144) Robert Donaldson (159) Hilary Marshall (277) John Halfnight (279) James Wood (285) Ernest Cracknell (291) Wm Scaife (295) Gabrielle McFarlane (316) Tim Glanton (325) David Wood (344) Peter Polet (349) Fraser Craig (354) Kerry Taher (360) Sandra Todd (362) Colin Beckett (375) Jenny Cowan (386) Gladman Developments Ltd (394) Taylor Wimpey (Scotland West) Ltd (401) Andrew McLaughlin (408) DM Land (415) Irene McLaughlin (421) Fraser McAlister (425) Gayle McCarthy (430) Margaret Cracknell (432) Davie White (446) Audrey Johnstone (451)		

Roderick Blackwood (452)		Irene Blackwood (453)
Paul Devlin (456)		Gladman Scotland and Quarriers (457)
CALA Homes (West) Ltd (458)		Stephen Welsh (459)
Susan Brown (462)		Rosemary McNally (465)
Steve Knott (466)		John Watson (467)
Mr & Mrs Price (474)		Campbell McLundie (477)
Mairghread McLundie (478)		Jennifer Bowles (480)
Kilmacolm Residents Association (481)		Zia Hotiana (482)
Andrew McMillan (485)		Barry Swan (486)
Andrew Bird (487)		Bettina Taher(488)
Elizabeth Forbes (489)		Robertson Homes & Carin Sykes (493)
Doreen Hyde (495)		
Provision of the development plan to which the issue relates:	Land for Housing (Policy 17), New Housing Development (Policy 18)	
Planning authority's summary of the representation(s):		
<p>Most of the representations in support of the identification of specific housing sites in the Renfrewshire Sub Housing Market Area have included substantial supporting information, which may be considered to be in excess of the 'limited supporting productions' encouraged by Planning Circular 6/2013. This has been submitted to the Examination, but the summaries below are based on the primary representation.</p> <p><u>Diane Jeavons (38), Paul Jeavons (44)</u></p> <ul style="list-style-type: none"><li>• Support for West of Quarry Drive, Kilmacolm not being included in Plan.</li></ul> <p><u>Graham Keith (79), David Baker (80) Robin Lee (90), Edmund Graham (95), Graham Clark (96), John Paton (99), John Anderson (101), Richard Cheek (102), Andrew Taylor (103), Jane Cunningham (106), Robin Watson (107), Graham Pottinger (108), David Walker (109), Tom McGhee (115), Ruth Keir (116), Christine Haddock (117), Graham Haddock (118), Stephen Ross (123), Allyson Ross (124), Colin McFarlane (125), Mary Carvill (136), Alasdair Keith (137), David Wharton (140), James McCulloch (141), Ernest Martin (142), Doreen Craig (143), Jennifer Schofield (144), Lesley Smith (150), Robert Donaldson (159), David Marshall (276), Hilary Marshall (277), Alan Green (278), John Halfnight (279), Rhona McKay (282); James Wood (285), Liam McMillan (290), Ernest Cracknell (291); Alasdair &amp; Tara Burns (293); Tim Glanton (325), Colleen Wood (342), David Wood (344), Gill McColl (345), Peter Polet (349), Philip Craig (352), Fraser Craig (354), Michael Bowles (356), Kerry Taher (360), Sally McCulloch (361), Sandra Todd (362), Lesley McMillan (363), Colin Beckett (375), Gail Beckett (378), Mike Closier (400), Helen Anderson (406), Andrew McLaughlin (408); Oliver Schofield (413), Brian Cassidy (420), Irene McLaughlin (421); Lynne Knott (424), Fraser McAllister (425), Louise Welsh (427), Gayle McCarthy (430), William McCarthy (431), Margaret Cracknell (432), Carrie White (435), Alison Winter (449); Audrey Johnstone (451), Roderick Blackwood (452), Irene Blackwood (453), Paul Devlin (456), Stephen Walsh (459), Susan Brown (462), Rosemary McNally (465), Steve Knott (466), Michael and Shona Price (474), Campbell McLundie (477), Mairgread McLundie (478); Jennifer McAdam (480), Zia Hotiana (482), Barry Swan (486), Andrew Bird (487), Betina Taher (488), Doreen Hyde (495)</u></p>		

- Support for Carsemeadow, Quarriers Village not being included in Plan. Reason include:  
Quarriers does not have an adequate transport system; limited public transport; local roads are not capable of carrying increased traffic; local roads not suitable; site is in the green belt; no facilities in the village (shops, schools, doctors/dentists); poor internet/mobile phone coverage; Quarriers architecture and history; conservation area; poor new build developments in past; rural nature of village will be altered; safety of vulnerable residents will be compromised; flooding/drainage issues; development will cause major disruption in village; village infrastructure is not adequate; social housing would degrade level of housing and could result in decrease in house prices; small village ethos would be compromised; impact on wildlife/habitat; would ruin clean and safe neighbourhood; landscape impact; impact on character/setting; no/poor amenities for children; impact on house prices/sales; lack of consultation with villagers; Quarriers doesn't need type of housing proposed; development would be dependent on private car use; loss of privacy; overshadowing; impact on trees; McInally Associates submission to Main Issues Report (Production); developers are profiteers.

Mr & Mrs Hargreaves (100)

- Leperstone Avenue should be used for terraced houses, bungalows or social housing.

Mr & Mrs Hargreaves (100), Charles Mills (321)

- Support for no housing development at North Denniston/Knapps, Kilmacolm as already permission for enough new housing in the village;

Wm Scaife (295); Margaret Scaife (298):

- Object to housing development at west of Quarry drive, Planetreeyetts and Knapps, all Kilmacolm. Reasons include:  
loss of greenbelt; impact on community facilities; insufficient parking in village; GP surgery too busy; primary school would not cope.

Gabrielle McFarlane (316)

- Leperstone Avenue should be developed for flats or very affordable housing.

Jenny Cowan (386)

- Support for no development on The Knapps, North Denniston, West of Quarry Drive, Planetreeyetts, all Kilmacolm. Reasons include:  
it is a small village and does not require large scale development of large, expensive homes in the green belt; attractiveness of green spaces; biodiversity

Gladman Scotland (394)

- Objects to the non-inclusion of land at Knapps, Kilmacolm. It is promoted as a housing development opportunity with an indicative capacity of 12 units. Extensive design and landscape works have resulted in a significantly reduced site area on land peripheral to the wider Knapps Loch area. Public access to the loch will not be hindered and could be enhanced. The site area is contained to the south by an historic field boundary and

to the east by a mature tree belt. The development would not represent a major incursion into the green belt and its overall integrity would not be reduced. The site would not extend any further south than the existing settlement boundary and there would be no coalescence issues. The development would complement the existing settlement edge and be in keeping with the existing character of the settlement.

- Supporting documents submitted.
- Objects to the non-inclusion of land at North Denniston, Kilmacolm. It is promoted as a housing development opportunity with an indicative capacity of 88 units. Extensive design and landscape works have significantly redefined (reduced) the site area. The site has been specifically designed to accord to the existing settlement edge and as a result the impact on the setting of Kilmacolm is minimised due to the visual containment of the site. The development would not represent a major incursion into the green belt and its overall integrity would not be reduced. The site would not extend the existing settlement boundary further south and there would be no coalescence issues. The development would include 25% affordable housing.
- Supporting documents submitted.

#### Mactaggart & Mickel Homes Ltd (398)

- Objects to land west of Quarry Drive, Kilmacolm not being identified for release from the green belt and allocated as a site for the development of 75 houses. The site was identified as the preferred option for housing development in the Renfrewshire SHMA in the Main Issues Report and was recommended for release in the version of the Proposed Plan taken to Committee in March 2018. The site is effective and deliverable and will provide for 25% affordable housing. Its development would provide a long term green belt edge through the provision of a landscape framework
- Supporting documents submitted.

#### Taylor Wimpey (West Scotland) Ltd (401)

- Objects to the non-allocation of land at Planetreeyetts as a new housing site. Planetreeyetts is best placed of the potential sites around Kilmacolm and Quarriers Village to provide much needed land for private and affordable homes. The proposal is for 112 new homes, of which 25% would be affordable. A Development Framework has been provided. A mix of semi-detached and detached homes is thought suitable here. The development can be undertaken in two phases to provide flexibility and clarity for the future growth of the village. The development can bring financial benefits to Kilmacolm and Inverclyde. The site is effective. The site contributes least to green belt objectives.
- Supporting documents submitted.

#### DM Land (415)

- Land at Port Glasgow Road, Kilmacolm (The Plots) should be released from the green belt for housing. The site is deliverable and there are no physical impediments to the development of the site. Its allocation would strengthen the green belt and not lead to pressure for further development. The watercourse on the site can be integrated into the development. There would be no traffic issues.

#### Davie White (446)



- Scale of development proposed at Carsemeadow, Quarriers is completely against nature of village. Increase in traffic will be catastrophic.

#### Gladman Scotland and Quarriers (457)

- Objects to the non-inclusion of land at Carsemeadow, Quarriers village as a housing development opportunity. The site can accommodate approximately 50 houses that can be delivered in the next 5 years. The site is well contained within the settlement, adjacent to housing on all sides and would link the part of Quarrier's Village to the north west with the converted former Bridge of Weir Hospital site. Its development would not lead to pressure for further release and would not conflict with green belt objectives set out in Clydeplan.

#### CALA Homes (West) Ltd (458)

- The Policy Station Field, Kilmacolm was not included in the Plan as a housing development opportunity. The Plan does not offer any new residential opportunity site allocations in Kilmacolm. It is argued that an allocation of new land in Kilmacolm is appropriate, and that the Police Station Field should be allocated.
- Supporting documents submitted.
- The ARP Field, Kilmacolm was not included in the Plan as a housing development opportunity. The Plan does not offer any new residential opportunity site allocations in Kilmacolm. It is argued that an allocation of new land in Kilmacolm is appropriate, and that the ARP Field should be allocated.
- Supporting documents submitted.

#### John Watson (467)

- Object to land at Smithy Brae (R65) being included for housing development. There is no need for the development of the site (see Issue 5). The site fulfils a valuable scenic element to the approach to the village. Access to the site is very poor – it is steep and leads to a congested junction.

#### Kilmacolm Residents Association (481)

- Support for retention in green belt/no development at West of Quarry Drive, Planetreeyetts, Knapps and North Denniston. There is significant local opposition to the development of the sites.
- The retention of West of Quarry Drive as green belt was supported by Councillors. There is significant local opposition to the development of the site.
- Development should happen at Balrossie and Smithy Brae before any green belt land is released.

#### Andrew McMillan (485)

- The greenfield part of Smithy Brae should be returned to green belt. There was no need for the release of this land.

#### Andrew Bird (487)

- Happy that sites at Carsemeadow, Quarriers Village (see above) and

Knapps/Denniston and ARP Field, Kilmacolm were not included in Plan.

Robertson Homes & Carin Sykes (493)

- Object to the non-allocation of West Glen Road for housing development. The proposed development area has been reduced from 5.7ha to 2.5ha in response to the Council's concerns. Development of the site would assist the Council to achieve its statutory land requirement. It would provide 40 homes, including 30% affordable. The site is deliverable within the Plan period. Refer to development framework supporting document.

**Modifications sought by those submitting representations:**

- Amend indicative tenure/density of Leperstone Avenue, Kilmacolm (100, 316)
- Include land at Knapps, Kilmacolm as a housing development opportunity (394)
- Include land at North Denniston, Kilmacolm as a housing development opportunity (394)
- Include land West of Quarry Drive, Kilmacolm as a housing development opportunity (398)
- Include land at Planetreeyetts as a housing development opportunity (401)
- Include land at Port Glasgow Road, Kilmacolm as a housing development opportunity (415)
- Carsemeadow, Quarriers Village – lower density housing and compulsory road improvements (446)
- Include land at Carsemeadow, Quarriers Village as a housing development opportunity (457)
- Include land at West Glen Road, Kilmacolm as a housing development opportunity (493)
- Include the Police Station Field, Kilmacolm as a housing development opportunity site (458)
- Include the ARP Field, Kilmacolm as a housing development opportunity site (458)

**Summary of responses (including reasons) by planning authority:**

Matters relevant to this issue dealt with in other Schedule 4s

Matters relating to housing supply targets, housing land requirement and housing land supply are dealt with under Issue 5. It sets an important context for the consideration of the issues dealt with here.

Numerous objections were submitted in respect of protecting/retaining the green belt. These are dealt with under Issue 4. These are considered to set an important context for matters considered here.

Leperstone Avenue, Kilmacolm (100, 316)

The Council, in partnership with Riverside Inverclyde URC, has identified the Leperstone Avenue site as an opportunity for self-build plots for people who want to move into Inverclyde. This is as part of the Council's repopulation priority. Planning permission has been granted for the creation of serviced plots, which have subsequently been created, with planning permission now issued for the erection of a dwellinghouse on one of the

plots.

Therefore, the Council's preferred strategy for the site has been implemented, and the suggested modifications for the site are not supported.

#### The Knapps, Kilmacolm (100, 321, 295, 298, 386, 394, 481, 487)

The Knapps site sits to the south of Kilmacolm, rising to the north east. It is bounded to the north by the low density residential Kilmacolm Conservation Area, to the west by bridge of Weir Road, to the south by countryside falling towards Knapps Loch, and to the east by an area of mixed woodland. The site itself is predominantly grassland with some tree and shrub cover.

The Council's assessment of the site is set out in the Proposed Development Site Assessment (Production), based on the site promoted at the Main Issues Report stage. However, a reduced area has been promoted for development through the Proposed Plan. A planning application for this site (also including the North Denniston site) was refused by the Council in June 2018 (Production). The application was for the same area at Knapps as promoted through the Proposed Plan.

Key findings from the Proposed Development Site Assessment are set out below. These comments were written in relation to a larger site, but are still considered relevant for the site now promoted:

- 'Development of this....site would have significant adverse impacts on local landscape character, landscape setting and the settlement pattern of the village' – based on SNH comments.
- 'development would have a significant adverse impact on the character and setting of the village. It would also impact on the setting of Knapps Loch, a locally important recreation resource.'

Turning to the planning application which covered both the Knapps and North Denniston sites, with site boundaries as promoted through the Proposed Plan, the Reporter is directed in particular to the sections of the application report headed:

- Appropriateness of the green belt location
- Landscape character and visual impact
- Built heritage

These set out robustly the Council's reasons as to why The Knapps is not a suitable housing development site.

The Reporter's attention is also drawn to the 1,120 objections submitted in respect of the planning application for this site.

It is recommended to the Reporter that no modifications are made to the plan in respect of this matter.

#### North Denniston, Kilmacolm (100, 321, 386, 394, 481, 487)

North Denniston sits to the south of Kilmacolm. It is a relatively flat site which sits between properties on Gryffe Road to its east and a former railway line (now NCN75) to its west. The site surrounds the North Denniston Farm buildings. Its northern boundary is formed by a fenced artificial surface playing field, and to the south primarily by the North

Denniston Farm access road, but a part of the site does extend to the B788 road further south. The site is predominantly grassland.

The Council's assessment of the site is set out in the Proposed Development Site Assessment (Production), based on the site promoted at the Main Issues Report stage. However, a reduced area has been promoted for development through the Proposed Plan. A planning application for this site (also including the Knapps site) was refused by the Council in June 2018 (Production). The application was for the same area at North Denniston as promoted through the Proposed Plan.

Key findings from the Proposed Development Site Assessment are set out below. These comments were written in relation to a larger site, but are still considered relevant for the site now promoted:

- 'Development of this large, open and prominent site would have significant adverse impacts on local landscape character and the landscape setting and settlement pattern of the village. There may be some landscape capacity in the northern most part of the site – north of Denniston Farm – where the site is lower lying and more contained in landscape terms.' – based on SNH comments.
- '...development... would still have a significant adverse impact on the character and setting of the village, extending the existing settlement in a southerly direction. Owing to the impact on the setting of and approach to Kilmacolm, and the elongation of the settlement along Bridge of Weir Road, this is not a preferred option for housing development in Kilmacolm.'

Turning to the planning application which covered both the North Denniston and Knapps sites, with site boundaries as promoted through the Proposed Plan, the Reporter is directed to the sections of the application report headed:

- Appropriateness of the green belt location
- Landscape character and visual impact
- Built heritage

These set out robustly the Council's reasons as to why the North Denniston is not a suitable housing development site.

The Reporter's attention is also drawn to the 1,120 objections submitted in respect of the planning application for this site.

It is recommended to the Reporter that no modifications are made to the Plan in respect of this matter.

#### West of Quarry Drive, Kilmacolm (38, 44, 295, 298, 386, 398, 481)

West of Quarry Drive sits to the north west of Kilmacolm. It is formed by undulating grassland rising northwards towards Kilmacolm cemetery. It is bounded to the south and east by residential areas of Kilmacolm, to the west by the cemetery road and to the north by a field, which lies between the site and the cemetery.

A Proposal of Application Notice has been submitted in respect of this site.

The Council's assessment of the site is set out in the Proposed Development Site Assessment (Production), based on the site promoted at the Main Issues Report stage. The site had been identified in the Main Issues Report as the preferred option for housing

land release in the Renfrewshire Sub Housing Market Area owing to it being considered to have the least impact on the character and setting of Kilmacolm, when compared to the other sites suggested for development.

The inclusion of the site as a preferred option in the Main Issues Report generated a substantial level of objection from the public with 137 objections received, as well as petitions. Strong themes of the objections were the recreational value of the site and its nature conservation value. With regard to the former, the site is known locally as Kilmacolm Meadow and its local recreational value is described in [www.kilmacolmmeadow.co.uk](http://www.kilmacolmmeadow.co.uk) (note: this is not a Council endorsed website). With regard to its nature conservation value, the site, as part of a larger site, was assessed as part of the Council's Local Nature Conservation Site Assessment (Production). This recommended the inclusion of a wetland area (not now part of the site proposed) in a new Local Nature Conservation Site. It also found the lowland meadow habitat of the site now proposed to be of nature conservation value, and to include some rare flora species. The extent of these was not so significant to justify Local Nature Conservation Status, but it was the one site included in the study that was identified as having potential for enhancement/restoration for nature conservation value. It was found that there was a number of increasingly rare old meadow plants found in the grassland part of the site, particularly where it has not been improved. The study also recognised the value of the site to the community as an experience of nature. It is noted that the ecological report submitted by Mactaggart & Mickel focuses on fauna, and particularly protected species, and mentions little about the flora value of the site.

The site has been the subject of two previous development plan examinations, in 2014 and 2004 (Productions). In 2004 the Reporter concluded (para 7.393):

"This does not, however, mean there would be no impact (on the character and landscape setting of the village) and, in a situation where there is no arithmetic need to provide additional owner-occupied housing on greenfield land, there is no justification for filling in a wedge of undeveloped land that is characteristic of the edge of Kilmacolm. Moreover, while the western and north western edges of the site could be formed by a stone wall, this and/or such trees as may be planted could be removed by new residents, and I am not convinced that the new green belt boundary would be significantly better than that which it would replace. On the ground, the site is not 'within' Kilmacolm; nor is it an obvious 'gap site' or an area where 'a minor green belt adjustment is required to remove an anomaly'. While not a major determining issue and while the scale of development along the southern boundary has been reduced, residents living in houses on the north side of Port Glasgow Road would also suffer some loss of amenity"

The Reporter in 2014 concluded that circumstances, particularly relating to housing land, had not changed such as to justify the release of the land for development (paragraphs 3 & 4, pages 113-114).

Planning officers had recommended that the site be identified as a housing development opportunity in the Proposed Plan, but this was not accepted by the Council's Environment and Regeneration Committee., and the Proposed Plan was issued maintaining the site as green belt.

It is recommended to the Reporter that no modifications are made to the Plan in respect of this matter.

Planetree yetts, Kilmacolm (295, 298, 386, 401, 481)

Planetreeyetts sits to the north of Kilmacolm. A Proposal of Application Notice has been submitted in respect of this site.

The Council's assessment of the site is set out in the Proposed Development Site Assessment (Production), based on the site promoted at the Main Issues Report stage, which matches the site promoted through the Proposed Plan. Key findings from the Proposed Development Site Assessment are set out below.

- 'This is a reasonably prominent, open site, which helps define the landscape setting of and characteristic approach to Kilmacolm from the north. Key f=views are afforded over the site from Finlaystone Road. Development of the whole site, particularly the northern area beyond the existing development line, would expand the village out of its existing, relatively well-contained setting. This would have adverse impacts on the local landscape character, the setting of, and northern approach to the village. There may be some landscape capacity in the southern part of the site, which is lower lying and more clearly relates to the existing settlement' – based on SNH comments.
- 'Development would have an adverse impact on the character and setting of the village. It would extend the existing well-contained village northwards and would not be contained by features that would form a robust settlement boundary.'

The Council's Local Nature Conservation Site Assessment found the parts of the Planetreeyetts site and adjoining land to be of interest and has proposed that part of the site be identified as part of a new wider Local Nature Conservation Site owing to its wetland value. It states that 'The eastern part of the site is of low nature conservation value as the pasture has long been improved and is heavily grazed. The western side by contrast is of high interest, notably the area of fen and carr in the extreme south. If this section is considered along with the marsh within the West Quarry survey area and acid grassland north to the large basin mire, then a block of high nature conservation value is formed. Several bat species have been recorded and there is good roost potential in both trees and the building'. The submission made in respect of Planetreeyetts responds to these findings and indicates that these parts of the site will be protected from development. However, consideration would still have to be given to the impact of development immediately adjacent to the proposed Local Nature Conservation Site.

The site was a subject of the 2004 Local Plan Inquiry Report. This concludes in paragraphs 7.410 and 7.411 that:

'7.410 It is located within what the structure plan describes as a Green Belt Structural Corridor between Kilmacolm and Port Glasgow and, while its development would not in itself result in coalescence, it could lead to it. I agree with the Council that it forms a significant part of the important rural setting of the northern part of Kilmacolm, and that its green belt designation is entirely appropriate. While the site's south eastern boundary may not relate particularly well to features on the ground, it is not so bad that an alteration is required to remove an anomaly, and I am not convinced that a considerable stretch of its proposed replacement would be much better

7.411 To allocate the objection site for housing would be to extend the built-up area out into the countryside, and to do so in a scenario when no more housing land requires to be released in Kilmacolm would undoubtedly set a most undesirable precedent.'

Circumstances have not changed such that the release of this land from the green belt for development can be justified. Therefore, it is recommended to the Reporter that no modifications are made to the Plan in respect of this matter.

Port Glasgow Road, Kilmacolm (415)



A representation to have this site removed from the green belt and included within the residential area is addressed under Issue 4, and for the avoidance of repetition, the Reporter is directed to the summary of the Council's response in that Schedule 4 for the Council's position. An assessment of the site is also included in the Councils Proposed Development Site Assessment document.

Two specific points relating the delivery of the site for development are commented on here:

- (1) The Council notes the different owners of the site support delivery of development upon it.
- (2) The Council notes the watercourse on the site runs diagonally across it, and considers it would be difficult to develop the site without culverting or redirecting the watercourse, which may raise objections from SEPA.

It is recommended to the Reporter that no modifications are made to the Plan in respect of this matter.

Carsemeadow, Quarriers Village (79, 80, 90, 95, 96, 99, 101, 102, 103, 106, 107, 108, 109, 115, 116, 117, 118, 123, 124, 125, 136, 137, 140, 141, 159, 276, 277, 278, 279, 282, 285, 290, 291, 293, 325, 342, 344, 345, 349, 352, 354, 356, 360, 361, 362, 363, 375, 378, 400, 406, 408, 413, 420, 421, 424, 425, 427, 430, 431, 432, 435, 449, 451, 452, 453, 456, 457, 459, 462, 465, 466, 474, 477, 478, 480, 482, 486, 487, 488, 495)

Carsemeadow sits to the east of Quarriers Village between the village boundary and the former Bridge of Weir Hospital development site to the east. The proposed site is a rectangular pasture field which rises gently from west to east before plateauing. It is bounded by roads/tracks to the north and south and by housing to the east and west.

The site is the subject of a planning permission in principle application (18/0190/IC) for residential development.

The Council's assessment of the site is set out in the Proposed Development Site Assessment (Production), based on a larger site promoted at the Main Issues Report stage. Key findings from the Proposed Development Site Assessment are set out below:

- Adverse impacts on local landscape and the setting of the village as the northern part of the site (i.e. the site being promoted through the Proposed Plan) is elevated and prominent.
- The site is remote from everyday services, which are located in Kilmacolm, approximately 4km away. It is therefore concluded that, if land for housing development is required, options within Kilmacolm are in a more sustainable location and should be considered ahead of Quarriers.

This site was not included as a preferred option in the Main Issues Report, but despite this the Council still received 124 objections to the site as a potential housing development opportunity. With regards the Proposed Plan, the Council received 80+ objections to housing development on the site and/or support for retaining the site in the green belt. There is therefore substantial local opposition to the development of this site. With regard to the points of objection:

- The Council shares concerns about the accessibility of the site to local services, and dependency on private car use.

- Landscape impact and impact on character/setting of the village is addressed above, and the Council shares these concerns.
- Impact on the built and cultural heritage of Quarriers Village would not necessarily be adverse and would be best assessed at the planning application stage, but it is a potential concern.
- The quality of past modern development in the village is not a determining factor, but does highlight the potential for adverse impact.
- The Council's Roads Service has not raised any concerns about access to the site, road safety or the capacity/suitability of the road network to accommodate the development.
- Impact of social housing and impact on property prices is conjecture and not a planning consideration.
- The Council's Local Nature Conservation Site Assessment has not identified the site of being of significant value for nature conservation.
- Poor internet/mobile phone coverage could be improved and should not be grounds for no development on the site.
- There could be an impact on the rural 'feel' of the village during construction and thereafter, as it would impact on its rural setting and elongate the built up area.
- Issues relating to flooding/drainage, loss of privacy, overshadowing and impact on trees would be dealt with at the planning application stage.
- The need for housing is addressed in Issue 5.

Whilst many of the points of objection raised are not valid planning matters or would be best dealt with at the planning application stage the Council considers the adverse impact on the character and setting of the village and the limited facilities/poor transport connectivity of the site to be key considerations.

Development of the site would have a significant impact on the approach to the village from the east along Craigbet Road/C43. The proposed development site provides for separation between Quarriers Village and the former Bridge of Weir hospital site which would be removed by development. This would also have an effect when travelling east from the village as the built up area would be extended significantly. Owing to the rising then plateaued nature of the site, development would be prominent in the landscape. The lack of everyday facilities in the village such as school, shops, doctors/dentist is also a concern, as whilst it is accepted that there is a limited bus service (Production) and that the NCN75 passes close, and links to the village, it can be anticipated that most journeys from the site will be undertaken by private car, making it potentially the least sustainable in transport terms of the sites promoted in the Renfrewshire Sub Housing Market Area. Quarriers Village provides a unique historic built environment and has a conservation area which extends to the edge of the promoted site. Not all modern development within Quarriers Village has complemented the historic environment, and the development of this site also has the potential to impact adversely.

It is recommended to the Reporter that no modifications are made to the Plan in respect of this matter.

#### West Glen Road, Kilmacolm (493)

The West Glen Road site sits to the north east of Kilmacolm.

The Council's assessment of the site is set out in the Proposed Development Site

Assessment (Production), based on a larger site promoted at the Main Issues Report stage. Key findings from the Proposed Development Site Assessment are set out below:

- Development would impact on the northern approach to the settlement at this location, extend the built-up area northwards, and could lead to additional development pressure in the area if a robust green belt boundary was not created.

The site was a subject of the 2004 Local Plan Inquiry Report. This concludes in paragraphs 7.477 that:

“West Glen Road and the driveway south to ‘Tathieknowe’, ‘Overton’ and Barclane Road forms a well defined strong and defensible boundary. Overton is a house of long standing, while the council has explained how ‘Tathieknowe’ came into being as an exception to green belt policy. The objection site does not represent an anomaly in this context. To allocate it for housing would be to extend the built-up area out into the countryside, and to do so in a scenario when no more housing land requires to be released in Kilmacolm would undoubtedly set a most undesirable precedent.”

Of particular concern to the Council with regards to the proposed development of this site is (1) the breaching of a strong defensible barrier (a road) at the southern boundary of the site, (2) the elongation of the built-up area northwards, (3) the impact on the setting of the village when approach from the north as the existing houses to the east of West Glen Road are well concealed by mature trees, and (4) the replacement of the strong green belt boundary with a hedgerow, which is much weaker, or structural planting which will take time to mature. As well as having an impact on its own right, development of this site will undoubtedly increase pressure for development on the west side of West Glen Road to extend further northwards also creating ribbon development almost as far as the easterly turn on West Glen Road, and thus removing a characteristic approach to Kilmacolm.

It is recommended to the Reporter that no modifications are made to the Plan in respect of this matter.

#### The Police Station Field, Kilmacolm

The Police Station Field site is a green wedge which runs from south to north into the centre of Kilmacolm. The site is part wooded (to the west) and part open (to the east). The site is bounded to the east by a former railway line now forming part of NCN75, to the south by woodland, to the west by the boundaries of Kilmacolm Primary School and residential properties and to the north by Lochwinnoch Road.

The Council's assessment of the site is set out in the Proposed Development Site Assessment which assesses the full site. This assessment related to a larger site submitted at the Main Issues Report stage. Key findings from the Proposed Development Site Assessment relevant to the site promoted now are:

- Development on the areas identified would have significant adverse impacts on landscape character and the landscape setting and settlement pattern of the village. There may be some landscape capacity within the northern part of the site
- Development of the area immediately adjacent to the Duchal Garden and Designed Landscape (GDL) is likely to have a significant adverse impact on the setting of the GDL.
- Potential adverse impact on The Cross conservation area, which is immediately north of the identified development area
- Police Station Filed survey site supports a substantial area of well-developed

woodland,...It is suggested this remains part of the existing Duchal Wood LNCS.

- ...the site is environmentally sensitive as parts are covered by a SINC (Site of Importance for Nature Conservation) and Garden and Designed Landscape designation. The site contributes significantly to the character of Kilmacolm, particularly the characteristic green wedge extending the countryside into the heart of the village. It is also a locally important resource for walking cycling etc.

The Proposed Development Site Assessment also includes the detailed concerns of Historic Environment Scotland with regard to the impact of the development of the site on Duchal Garden and Designed Landscape.

The site was a subject of both the 2004 Local Plan Inquiry and the 2014 Local Development Plan Examination. The former focused on the north east corner of the site as a possible location for affordable housing. The 2014 Local Development Plan Examination (Issue 9.1) is more current and relevant to refer to. The Reporter comments on the site extensively, referring to it being an important rural wedge, a valuable connection to the rural landscape, its nature conservation value, that development would detract to some extent from the quiet enjoyment of the access route through the site, impact on the conservation area, and ultimately concluding in paragraph 17:

“...I consider that the main concerns regarding the proposed development of the site is the detrimental effect this would have on the semi-rural character of the Kilmacolm. This concern applies particularly to the northern and wooded parts of the site.”

The Council's position on this site remains as it was for the previous local plan inquiry/examination, which is that this is a significant and valuable green wedge running into the heart of Kilmacolm, and as such is characteristic of the village and should remain undeveloped. Additional value and protection is afforded to the site through its importance as a habitat and for nature conservation and for its contribution to the historic environment.

It is recommended to the Reporter that no modifications are made to the Plan in respect of this matter.

#### The ARP Field, Kilmacolm

The ARP Field is an area of undulating pasture which sits to the south west of Kilmacolm. The submitted site is bound to the north by the River Gryffe, to the east by Lochwinnoch Road, to the south by the B788 and to the west by an agricultural field boundary. Only the northernmost field appears to be suggested for housing development, with only structural planting proposed within the middle field and no development in the southernmost field. It is not clear, therefore, why such an extensive site is covered by the representation.

The Council's assessment of the site is set out in the Proposed Development Site Assessment which assesses the full site. Key findings from the Proposed Development Site Assessment are:

- Development of this large, visually open and prominent site would have significant adverse impacts on local landscape character and the setting of the village.
- An area within the northern part of the site is recommended as an LNCS by the Councils Local Nature Conservation Site Assessment
- The site is separate from the existing settlement boundary
- 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 (SNH comments)

- The submitted site would represent an illogical and unsustainable expansion of Kilmacolm, be poorly connected to the village in urban form terms, and distant from services available within the village centre. It would also have an adverse impact on the character and setting of the village, by extending development beyond the River Gryffe.

Whilst these comments were written in relation to the full site, they are considered to be equally relevant to the northernmost site on its own. Building on these, the Council is concerned about: (1) the breaching of the River Gryffe as a clearly identifiable visual boundary, and the precedent and pressure this would set for further southern expansion in an unsustainable direction away from the village centre; (2) the impact on the environs and nature conservation value of the River Gryffe, which is mainly buffered from development at this location, and the impact on the connectivity of the island of habitat here, which would be surrounded by development; and (3) the adverse impact on the landscape character and setting of the village as approached from the south, and leaving from the north.

It is recommended to the Reporter that no modifications are made to the Plan in respect of this matter.

<b>Reporter's conclusions:</b>
<b>Reporter's recommendations:</b>

Issue 9	Our Homes and Communities - other	
Development plan reference:	Section 7.0, Pages 21-27	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Scottish Environment Protection Agency (93) Stuart McMillan MP (286) Inverclyde Health and Social Care Partnership (294) Scottish Government (411) Theatres Trust (455) Woodland Trust Scotland (460) West College Scotland (494) Doreen Hyde (495) Councillor David Wilson (560)		
Provision of the development plan to which the issue relates:	Land for Housing (Policy 17), New Housing Development (Policy 18), Individual and Small Scale Housing Development in the Green Belt and Countryside (Policy 19), Residential Areas (Policy 20), Community Facilities (Policy 21)	
Planning authority's summary of the representation(s):		
<u>Scottish Environment Protection Agency (93)</u> <ul style="list-style-type: none"><li>• Comments provided on individual sites.</li><li>• Note that the requirements for flood risk assessment are not mentioned in Schedules 3 &amp; 4 and there is no explicit link to the Development Sites Assessment where this information would be expected to be found.</li><li>• Cemetery proposals must be considered in line with SEPA guidance.</li><li>• Consideration of sites for early years facilities must take their increased vulnerability into account. SEPA reserves its position on the acceptability of any allocation and would expect to be consulted on individual proposals in line with its guidance.</li></ul> <u>Stuart McMillan MP (286)</u> <ul style="list-style-type: none"><li>• Urge Council to involve the NHS at an early stage in discussions about future housing developments and expect clear, early discussions about school capacity and school transport plans.</li></ul> <u>Inverclyde Health and Social Care Partnership (294)</u> <ul style="list-style-type: none"><li>• Current Local Housing Strategy stipulates 3% of all new build social housing should meet wheelchair accessible standards, pleased that the Proposed Plan encourages particular needs housing to meet recognised requirements. The Government's ambition to ensure realistic targets are set for wheelchair accessible housing will be reflected in</li></ul>		



the next iteration of the LHS guidance and we believe this should be acknowledged within the LDP.

#### Scottish Government (411)

- Where a need is identified, policies should support the delivery of appropriate specialist and other specific needs housing and consider allocating specific sites. If there are no needs, this should be explained.

#### Theatres Trust (455)

- Support the inclusion of Policy 21 (Community Facilities) and the requirement that any loss of community facilities should be justified. The policy could be further strengthened by specifying the type of facilities it applies to and by stating that where proposals will result in a loss of a facility, it should be demonstrated that the facility has been marketed for at least a year at an appropriate price/rental value.

#### Woodland Trust Scotland (460)

- Oppose unsympathetic development adjacent to or directly impacting ancient woodland.

#### West College Scotland (494)

- Object to the exclusion of education as part of Policy 21 (Community Facilities).
- Policy 21 could be expanded to refer to Community and Education Facilities to enable the significant importance of the new Greenock campus to be formally recognised.

#### Doreen Hyde (495)

- Quarriers Village is not suitable for Kibble development.

#### Councillor David Wilson (560)

- Pleased there is no planned provision for temporary or permanent Gypsy Traveller sites.

#### **Modifications sought by those submitting representations:**

- Include a policy to support delivery of appropriate specialist and other specific needs housing where a need is identified or, if there is no need, explain this in the plan. (411)
- Reword Policy 21 to specify the types of facility it applies to and that this includes cultural facilities such as theatres. (455)
- Reword the criteria for the loss of a community facility to include at a minimum evidence of marketing for at least 1 year at a price or rental value appropriate to its existing use and condition. (455)
- Policy 21 should be amended to read:  
“Proposals for the new community and education facilities identified in Schedule 5 will be supported. Community and education facilities in other locations will be supported where the location is appropriate in terms of avoiding adverse impact on the amenity and operation of existing and surrounding uses and where it can be reached

conveniently by walking, cycling or public transport by its proposed users” (494)

- Schedule 5 should be amended to read:

“SCHEDULE 5: Community and Education Facilities Opportunities” and “New West College Scotland Greenock Campus” added to the list. (494)

### **Summary of responses (including reasons) by planning authority:**

#### Schedules 3 & 4 (93)

The purpose of Schedules 3 and 4 is to set out the likely tenure and capacity of the sites identified for housing in the Plan. Any applications on the housing sites identified will be assessed against the relevant policies of the Plan at the planning application stage, and statutory consultations, including with SEPA, will be undertaken. The Proposed Development Site Assessment document was published to support the publication of the Proposed Plan, and will not be an ongoing reference document. Reference to the requirement for a Flood Risk Assessment would be better made in the SEA Environmental Report and Action Programme. It is considered that modifications to the Plan are not required in relation to these matters.

#### Early Years and Cemetery Facilities (93)

Any applications for early years and cemetery facilities will be assessed against the relevant policies of the Plan at the planning application stage, and statutory consultations, including with SEPA, will be undertaken. It is considered that modifications to the Plan are not required in relation to these matters.

#### Housing Development – impact on health and school facilities (286)

The Planning Service works closely and continuously with Education in relation to housing development and school capacity and engaged with Education throughout the preparation of the Plan to determine where new housing development could cause capacity issues. The Council also liaised with Inverclyde CHSCP and NHSGGC during the Local Development Plan process. It is considered that modifications to the Plan are not required in relation to these matters.

#### Specialist/Wheelchair Accessible Housing (294) (411)

The Council's Local Housing Strategy sets a target of 3% of all new build social rented housing being wheelchair accessible, which the Council will pursue through its role as strategic housing authority. However there is no equivalent target set for the private sector for wheelchair accessible housing, or for any other specialist provision, that would enable the Plan to set a policy requirement for this. It is considered that modifications to the Plan are not required in relation to this matter.

#### Community Facilities (455) (494)

The Council does consider that it would be helpful for Policy 21 to specify which types of uses it applies to as this would create an exclusive list, when the best approach would be to assess the nature of the proposals being made. Taking the example of a theatre, whilst these could be community-operated, they can also be run on a commercial basis, similar to a cinema. Such uses are considered to be covered by the Network of Centres policy

(Policy 22) and Schedule 6. The Council considers that education facilities are community facilities, and that there is no specific need to reference education in the section heading or Policy 21. However, if the Reporter is minded to do so, the Council is not opposed to this.

The Council does not consider it appropriate to include a minimal marketing period in Policy 21. The policy already requires demonstration that the facility is not required for community use, and it is considered the evidence presented is best judged on a case by case basis. It is considered that modifications to the Plan are not required in relation to this matter.

<b>Reporter's conclusions:</b>
<b>Reporter's recommendations:</b>

Issue 10	Our Town and Local Centres	
Development plan reference:	Section 8.0, Pages 28-31	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Lunar Greenock S.a.r.l. (29) James Clarke (51) B Johnston (105) Peel Land and Property (343) Clydebuilt LP (374) James Dick (436) Scottish Natural Heritage (484) West College Scotland (494)		
Provision of the development plan to which the issue relates:	Network of Centres Strategy (Policy 22), Greenock Town Centre Retail Core (Policy 23), Network of Centres Sui Generis Uses (Policy 24)	
Planning authority's summary of the representation(s):		
<u>Lunar Greenock S.a.r.l. (29)</u> <ul style="list-style-type: none"><li>• The Plan should comply with the Strategic Development Plan with regard to Greenock town centre and Greenock's strategic significance should not be overlooked or materially altered by the elevation of other town centre locations to a similar definition. Greenock town centre should continue to be the primary and first priority for regeneration, enhancement and promotion of areas for change. In this regard, Priority Places should not compete directly with Greenock Town Centre in the future, particularly with regard to Class 1 and Class 3 uses.</li><li>• The Council should consider loosening planning policy to promote a broader range and mix of uses in town centres, such as residential, leisure and business uses, where compatibility issues can be addressed. Previous representations included sites at Hunter Place and King Street for potential redevelopment that would aid the regeneration of and introduce flexibility to the town centre. These included potential Class 11 and Class 3 uses at the east end of the mall and a new multi-storey car park to serve these and new residential uses offering a mixed-use environment. These would increase the vitality and viability of Greenock town centre by helping grow the evening economy, aid the redevelopment of an important area of public realm and increase the linkages between different areas of the town centre.</li><li>• Flexibility is key and might be achieved using Simplified Planning Zones (SPZ), which under current policy and market conditions should be considered for Greenock or other Inverclyde town centres to help Greenock's businesses grow and adapt as well as encouraging new businesses within the town centre.</li><li>• Agree the retail core should remain the main focus for retail development. A degree of flexibility should be introduced to the Retail Core allowing other complementary uses to be located there. Residential, restaurant, leisure and other commercial uses would</li></ul>		

entice people to visit, creating linked trips, employment opportunities and other spill-over effects. Support Policy 23 as it allows for this flexibility for the eastern part of the Oak Mall but provides a retained level of protection for retail uses in the majority of the central area.

- The Council should consider planning controls that may be needed to ensure retailers' amenity is protected. This may include operating hours, frontage design, delivery times and waste disposal measures and could be included in an SPZ order or new retail or town centre policy written with flexibility.
- Support the preference for new retail development to be within the Greenock Central Area.

#### James Clarke (51)

- Land at Ardgowan Street, Port Glasgow should form part of the new town centre development rather than being within the residential area as it is not suitable for residential development.

#### B Johnston (105)

- Objects to the identification of a vacant church at 15 Nelson Street as a Network of Centres Opportunity in Schedule 8 as:
  - the number of vacant shops within the town centre indicates there is no need for extra retail space and these should be reused instead;
  - use of this site for retail will not enhance the area, only harm the small independent traders nearby causing more empty shops in the West Station area;
  - environmental factors and increased car parking pressure would impact the immediate area;
  - it will impact on house prices; and
  - the building is over 150 years old and as there is little left of the town's built heritage the street frontage should be conserved as it is.

#### Peel Land and Property (343)

- Seek the identification of land at Union Street, Greenock for mixed use including residential, commercial and a major element of retail and the inclusion of the site within Greenock town centre. This would provide the flexibility needed to allow the redevelopment of this key site and the removal of semi-derelict and redundant buildings and the redundant railway bridge linking the site with Ocean Terminal, as well as allowing the promotion of the site to ensure investment and development is forthcoming. Environmental improvements carried out as part of any future development would also enhance the local area. The proximity of the site to Ocean Terminal is also important meaning its redevelopment will help create a destination that is welcoming to both tourists and residents. Peel remains committed to the site and has recently submitted an application promoting development on part of it.

#### Clydebuilt LP (374)

- No objection to sequential approach in principle but object to Schedule 7 introducing a sequential assessment within town centres. Greenock being identified as a strategic centre in Clydeplan should not result in a sequential preference over other town centres in the area. Port Glasgow and Gourock town centres are not 'second preference

locations' and should be allowed to develop in line with SPP without compromise.

- The approach set out in Schedule 7 will potentially hinder investment in Port Glasgow and Gourock town centres.
- The policy seeks to split Gourock (presumably means Greenock) town centre into a central and outer area that are given unequal policy weighting and, for non-retail uses, there is a policy test for uses with an Inverclyde-wide catchment rather than a whole town catchment. This type of categorisation is very difficult to demonstrate and divisive; the Council should be seeking to encourage investment in all its town centres with no barriers and the policy does not achieve this.

#### James Dick (436)

- Previously there was a large car park opposite St Ninian's Parish Church serving both it and the shops at Cumberland Walk, which has now been developed as a school. Disabled parking and space for the community bus to drop off elderly parishioners is required. Ask that any developer of Cumberland Walk talk with Kirk Session representatives in developing proposals for the site, regarding this matter.

#### Scottish Natural Heritage (484)

- Support the town centre approach in Policy 22 but suggest it would be beneficial to set out the sequential approach referenced in part a) within the policy wording and feel the wording regarding supporting business, residential and hotel uses within centres could be strengthened to ensure it is appropriately located.

#### West College Scotland (494)

- Object to the exclusion of the East India Dock part of the Harbours site from the defined town centre and propose a new boundary. The uses included in the Priority Places supplementary guidance as it relates to the Harbours are appropriate town centre uses and including the site within the town centre boundary would enhance the prospect of the successful delivery of mixed use development on the site.

#### **Modifications sought by those submitting representations:**

- Suggest that the Council further investigate the benefits of attracting other town centre uses, particularly residential and leisure by loosening planning policy and looking at other policy tools such as establishing an SPZ for Inverclyde town centres. (29)
- Include land at Ardgowan Street, Port Glasgow within town centre/remove from residential area. (51)
- Remove site C1 (15 Nelson Street, Greenock) from Schedule 8, Network of Centre Opportunities. (105)
- Identify site R36 (Union Street, Greenock) for mixed use including residential, commercial and retail, and include within Greenock town centre. (343)
- Amend Schedule 7 to remove the segregation of Greenock town centre from Port Glasgow and Gourock town centres, making one sequential policy that applies equally to all town centres. (374)
- Change text under Role and Function in Schedule 7 to read:  
"Greenock, Gourock and Port Glasgow are the preferred location for new retail development over 1000 sq. m and other Schedule 7 uses."  
Delete all other text under Role and Function relating to Greenock, Gourock and Port



Glasgow town centres. (374)

- Suggest new wording for Policy 22:

“The preferred locations for the uses set out in Schedule 6 are within the network of town and local centres identified in Schedule 7 using the following sequential town centre first approach:

- Town Centres (including local centres);
- Edge of town centre
- Other commercial centres; and
- Out-of-centre locations that are, or can be, made easily accessible by a choice of transport modes.

Proposals for Business (Class 4), residential and hotel uses will also be supported in appropriate locations within our town and local centres.

All development proposals must accord with relevant Supplementary Planning Guidance and policies.” (484)

- The eastern boundary of Greenock town centre should be amended to include the East India Dock part of the Harbours site (map provided). (494)
- Schedule 8 should be amended to include the East India Dock part of the harbours site as a Network of Centres Opportunity. (Suggestion of change to Priority Places SG also made) (494)

#### **Summary of responses (including reasons) by planning authority:**

##### Greenock Strategic Town Centre (29)

The Proposed Plan recognises Greenock’s status as a strategic centre within the adopted Clydeplan Strategic Development Plan (paragraph 8.2) and it is promoted as the preferred location for large-scale retail development (over 1,000 square metres) and non-retail development with an Inverclyde-wide catchment. The level of retail proposed for the Priority Places will be limited to protect the vitality and viability of the town centres, including Greenock. It is not considered that any modification to the Plan is required in relation to this matter.

##### Town Centre Uses (29)

Policy 22 indicates that proposals for Business (Class 4), residential and hotel uses will be supported in town and local centres, and Class 11 (Assembly and Leisure) is listed in Schedule 6 as a use type that will be directed to the network of centres, along with many others. A more flexible planning regime has been introduced for the outer area of Greenock town centre and the area covered by the retail core has been reduced (see below). It is not considered that any modification to the Plan is required in relation to this matter.

##### Simplified Planning Zones (29)

The Council has no plans to introduce Simplified Planning Zones within its town centres at this time. However, should its position change on this, these can be prepared without there being reference to them within the Plan. It is not considered that any modification to the Plan is required in relation to this matter.

##### Policy 23 - Greenock Town Centre Retail Core (29)

The area covered by Greenock town centre Retail Core, in which change of use from retail is restricted, has been reduced in size from the currently adopted Local Development Plan. This is to allow greater flexibility in the eastern end of the Oak Mall and Clyde Square, whilst maintaining a core retail area within the town centre. It is not considered that any modification to the Plan is required in relation to this matter.

#### Policy 22 – Network of Centres Strategy (29) (374) (484)

Support for the preference for new retail development to be directed to the central area of Greenock town centre is noted.

The Plan sets out the centres in the network in the form of a hierarchy and explains how they complement each other as per the advice in paragraph 61 of SPP. Greenock Central Area's identification as the preferred location for retail development over 1000 square metres or non-retail development with an Inverclyde-wide catchment reflects the Council's position that Greenock should be safeguarded as the main town centre in Inverclyde. It is considered that the approach set out in Schedule 7 will help direct town centre development to the right locations and support the role and function of all the centres in Inverclyde.

It is not felt necessary to repeat the sequential approach set out in SPP within the Policy, as it is felt that the sequential approach is clearly set out already in SPP and is otherwise well understood. While Policy 22 supports business, residential and hotel uses within centres, any such proposals must also be assessed against all the other relevant policies in the plan and requirements set out in supplementary guidance, as is the case with all development proposals, and it is not felt necessary to state this in the Policy. It is not considered that any modification to the Plan is required in relation to this matter.

#### Port Glasgow Town Centre Boundary (51)

Land at Ardgowan Street - whilst the site referred to lies adjacent to Port Glasgow town centre, any retail development on this site, which would be supported in principle through town centre designation on the site, would not relate well to either the traditional town centre or retail park area. Retail development here could have the potential to draw trade from the traditional town centre area, which should not be supported. It is not considered that any modification to the Plan is required in relation to this matter.

#### Network of Centre Opportunities Site C1 15 Nelson Street, Greenock (105)

The site is a derelict former church within the Central Area of the town centre and its identification as a network of centres opportunity would allow for the development of any of the town centre uses identified in Schedule 6, as well as Business (Class 4), residential or hotel use. Therefore, it is not specifically identified for retail development. The site's identification as an opportunity will encourage the site/building to be brought back into productive use. The building is not listed or within the Greenock West End Conservation Area and any proposal for retail or another use, whether conversion or new-build, would be assessed in terms of impact on traffic and amenity. Impact of development on house prices is not a planning consideration. It is not considered that any modification to the Plan is required in relation to this matter.

#### Site at Union Street, Greenock (R36) (343)

This site lies to the west of Greenock town centre immediately adjacent to Greenock West End Conservation Area, and is in part-use as a container terminal.

The representation seeks a mixed use designation for the site including a major element of retail. The site is considered to be in an out of centre location, and separated from the Outer Area of Greenock town centre by a primarily residential street block. Major retail development at this location would be at odds with the Plan's network of centres strategy, as it would draw trade from the town centre, impacting on its vibrancy, vitality and viability, and by drawing investment away from sequentially preferable locations within the town centre as designated. The extension of the town centre boundary to include this site, so as to justify retail development is not considered appropriate as it would extend the area where retail development could be considered acceptable, whilst the Plan is trying to identify a more focussed retail core. And as previously mentioned, the site is separated from the existing town centre by a predominantly residential block.

While the site is close to Ocean Terminal, it is not close to the pedestrian access point or on the pedestrian route to/from the town centre, which is scheduled to relocate in any case to a location within the town centre adjacent to the cinema, as set out in Issue 1. It is not considered that any modification to the Plan is required in relation to this matter.

#### Cumberland Walk Local Centre (436)

The site at Cumberland Walk is due to be demolished and ownership transferred to River Clyde Homes for redevelopment. Any discussions regarding parking provision should therefore be with River Clyde Homes. It is not considered that any modification to the Plan is required in relation to this matter.

#### The Harbours, Greenock (494)

The Harbours are identified as a Priority Place within the Plan, with a development framework set out in Supplementary Guidance. It is identified as an area where retail development is restricted to servicing tourism, heritage and leisure uses and is not to exceed 250 square metres. This strategy is best reinforced by not including the site within the town centre, as this could increase pressure for larger scale retail development on the site. The Council feels that the development framework in place for the Harbours will enable the delivery of the site for its preferred uses and that its inclusion within the town centre would not provide any extra impetus for its development. It is not considered that any modification to the Plan is required in relation to this matter.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

Issue 11	Our Jobs and Businesses	
Development plan reference:	Section 9.0, Pages 32-34	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Stephen Johnston (53) Scottish Environment Protection Agency (SEPA) (93) Robert Buirds (The Campaign to Save Inchgreen Dry Dock) (152) Stuart McMillan MSP (286) McInally Associates Ltd for Peel Land and Property (351) Wilson Dunlop (The Campaign to Save Inchgreen Dry Dock) (359) North Planning and Development for OCO Westend (397) Scottish Government (411) North Planning and Development for Crucible Development (Scotland) Ltd (423) Woodland Trust Scotland (460) Scottish Natural Heritage (SNH) (484) Scott Hobbs Planning for West College Scotland (494) Jane Conway (552) David Wilson (560)		
Provision of the development plan to which the issue relates:	Business and Industrial Areas (Policy 25) Business and Industrial Development Opportunities (Policy 26) Tourism Development (Policy 27)	
Planning authority's summary of the representation(s):		
<u>Stephen Johnston (53)</u> <ul style="list-style-type: none"><li>My balcony looks onto the E9 Main Street site in Greenock. I'm concerned that industrial uses such as sewage plants, boiler plants, incinerators, lorry parks etc. may impact on residential amenity and consequently lower the value of my property.</li></ul> <u>Scottish Environment Protection Agency (SEPA) (93)</u> <ul style="list-style-type: none"><li>Requirements for flood risk assessment on Business and Industrial development opportunities are not mentioned in Schedule 9 and there is no explicit link to the Development Sites Assessment, where this information would be expected to be found.</li><li>SPP identifies sites used for holiday or short-let caravans and camping to be most vulnerable in the context of flood risk. Recommend that flood risk is considered within Policy 27.</li></ul> <u>The Campaign to Save Inchgreen Dry Dock - Robert Buirds (152) &amp; Wilson Dunlop (359)</u> <ul style="list-style-type: none"><li>The LDP lacks vision and ambition regarding industry and has no clear industrial strategy to encourage new industrial development in Inverclyde.</li></ul> <u>Stuart McMillan MSP (286)</u>		

- There is little in the LDP to suggest there is any clear narrative as to how to grow the tourism offer, the local economy and thus create more employment opportunities.

#### McInally Associates Ltd for Peel Land and Property (351)

- Support the identification of the site at Inchgreen (E7) as a Business Industrial Area where Policy 25, Policy 25(b) and Policy 26 apply.
- Welcome the promotion of the site as a Strategic Economic Investment Location and a Business and Industrial Development Opportunity site.

#### North Planning and Development for OCO Westend (397) and North Planning and Development for Crucible Developments (Scotland) Limited (423)

- Support Policy 25 – Business and Industrial Areas and Policy 26 - Business and Industrial Development Opportunities. Whilst they establish a clear framework to support Class 4 use as the preferred and predominant use at Cartside Avenue (allocation E10), these policies also allow for Class 5 and/or 6 uses as well as ‘other uses’ where they are ‘ancillary’ to Class 4, 5 and 6.

#### Scottish Government (411)

- The Plan should encourage opportunities for home-working, live-work units, micro-businesses and community hubs, in line with para 96 of SPP.
- The Plan should support opportunities for integrating efficient energy and waste innovations within business environments. Industry stakeholders should engage with planning authorities to help facilitate co-location, in line with para 96 in SPP.
- Whilst there are no mineral extraction sites identified in Inverclyde, the reference to mineral extraction in the Proposed Plan does not safeguard all workable mineral resources, as required by para 237 of SPP.

#### Woodland Trust Scotland (460)

- The E3 allocation at Newark Street, Port Glasgow borders an area of native woodland at its southern and western edges. This area of woodland is a valuable asset to the development site and should be protected and enhanced as high quality greenspace.
- As the majority of the E12 allocation at Ingleston Street in Greenock is covered in woodland, a tree survey should be required. The trees would provide excellent landscaping for development, while also acting as high quality greenspace.

#### Scottish Natural Heritage (SNH) (484)

- The majority of the E12 allocation at Ingleston Street in Greenock is made up of semi-natural woodland. Recommend that protected species are taken into consideration where suitable habitat exists.
- Policy 27: Tourism Development – while we support the requirement for the development of tourism related facilities to be supported where it avoids adverse impact on the green network, this is rather specific and should take the wider natural heritage into consideration.
- Policy 27: Tourism Development – Consideration should also be given to enhancing the enjoyment of and access to natural heritage.

Scott Hobbs Planning for West College Scotland (494)

- West College Scotland plays a significant role in the economic and commercial success of Inverclyde, both as an education and training provider and one of the largest employers in Inverclyde. The significance of the College's role should be recognised in the LDP.

Jane Conway (552)

- The Plan fails to encourage innovative use of the river for both travel, e.g. river taxis, or business, e.g. employment opportunities related to boating, sailing and recreation.

David Wilson (560)

- Policy 27 is fragmented and uncoordinated.

Correction of mapping errors (Inverclyde Council)

- The Council has noted that the designation of some business/industrial areas on the Proposals Map does not match their intended designation as per Policy 25 in the Written Statement. This affects land at Inchgreen, Pottery Street and Ocean Terminal, Greenock.

**Modifications sought by those submitting representations:**

- Recommend that flood risk is considered within Policy 27, as SPP identifies sites used for holiday or short-let caravans and camping to be most vulnerable to flood risk. (93)
- The Plan should encourage opportunities for home-working, live-work units, micro-businesses and community hubs, in line with para 95 of SPP. (411)
- The Plan should support opportunities for integrating efficient energy and waste innovations within business environments, in line with para 96 of SPP (411)
- Para 33 of the Proposed Plan should be updated to safeguard all workable mineral resources, in line with para 237 of SPP (411)
- The area of woodland bordering the southern and western edges of the E3 allocation at Newark Street, Port Glasgow should be protected and enhanced as high quality greenspace. (460)
- A tree survey should be requested for the E12 site at Ingleston Street in Greenock before it is allocated for any further development. Alternatively, this small area could be managed as a high quality greenspace close to where people work, which has the potential to be well used. (460).
- Consider that the developer should provide protected species surveys, including bats and breeding bird surveys, for the E12 allocation site at Ingleston Street in Greenock. (484)
- To ensure the protection and enhancement of the wider natural heritage interests, we suggest amending Policy 27 – Tourism Development to read “Development of tourism related facilities will be supported in appropriate locations where.....c) it is appropriately designed for its location and avoids *adverse impact on the natural heritage, including landscape*, and historic places”. (484)
- Expand the consideration given to natural heritage and highlight that development proposals should seek to encourage the enjoyment of and access to the natural



environment. Suggest amending Policy 27 – Tourism Development to read “Development of tourism related facilities will be supported in appropriate locations where....there are no adverse impacts on natural heritage assets including landscape and visual impacts....and contribute to the enjoyment of and access to the natural environment”. (484)

- The significant role which West College Scotland plays in the economic and commercial success of Inverclyde should be recognised in the Plan. (494)
- The Plan address the need to encourage the innovative use of the river for both travel, e.g. river taxis, or business, e.g. employment opportunities related to boating, sailing and recreation. (552)
- Amend Proposals Map to reflect intended designation of business/industrial sites under Policy 25 (Inverclyde Council).

#### **Summary of responses (including reasons) by planning authority:**

##### Vision and Strategy for Industrial Development (152) (359)

The vision and strategy for economic development and regeneration in Inverclyde is set out in the Inverclyde Economic Development & Regeneration Single Operating Plan 2016-2019, which was jointly prepared by Inverclyde Council and Riverside Inverclyde (URC). The vision and broad strategy of the Single Operating Plan is reflected in the LDP’s Spatial Development Strategy (Our Jobs and Businesses), which “supports the Inverclyde economy by identifying land and business and industrial development, protecting existing business and industrial areas, and supporting tourism development”. The LDP seeks to achieve the latter through Policy 25 – Business and Industrial Areas, Policy 26 – Business and Industrial Development Opportunities, and Policy 27 – Tourism Development.

Support for policies 25 and 26 noted. It is considered that a modification to the Plan is not required in relation to this matter.

##### Home-working, live-work units, micro-businesses and community hubs (411)

Para 95 of Scottish Planning Policy states that “Plans should encourage opportunities for home-working, live-work units, micro-businesses and community hubs”. It is not considered that the Plan needs a specific policy in relation to this matter, and that Policies 20 and 21 provide the necessary assessment framework. It is considered that a modification to the Plan is not required in relation to this matter.

##### Tourism Development (286) (460) (484) (552) (560)

With regard to a narrative for growing the tourism sector, the Inverclyde Regional Tourism Strategy 2016-2020 provides the framework for tourism growth in the area, setting out a vision, mission and three delivery themes. A Tourism Inverclyde Action Plan was subsequently developed to support the strategy. It is considered that Policy 27 – Tourism Development broadly supports the tourism strategy and action plan by safeguarding existing tourism related facilities and providing the flexibility to support proposals for a range of tourism related facilities in appropriate locations. In addition, Policy 25 – Business and Industrial Areas safeguards Green Ocean Terminal (25(c) for freight transport and cruise liner activity. In line with para 105 of SPP, Policy 3 – Priority Places promotes opportunities for tourism related facilities at The Harbours, and James Watt Dock/Garvel Island in Greenock.

The ‘Green Network’ referenced in Policy 27 – Tourism Development is a collective term

for the environmental, recreational and amenity resources identified by section 11.0 Our Natural and Open Spaces. It is accepted that the use of 'Green Network' may cause some confusion. The Council is not opposed to criterion (c) of Policy 27 being amended to read:

“it is appropriately designed for its location and avoids significant adverse impact on our natural and open spaces and historic buildings and places.”

It is considered that Policy 27, by supporting development proposals for tourism related facilities in appropriate locations, encourages access to and enjoyment of Inverclyde's natural heritage. It is not considered necessary to explicitly highlight 'natural heritage' in this context.

With regard to encouraging the innovative use of the River Clyde, it is considered that river taxis, boating, sailing and other recreational uses associated with the river fall under 'tourism related facilities'. Policy 27 – Tourism Development safeguards existing tourism related facilities and supports development proposals for new facilities in appropriate locations.

With regard to the comment that “tourism policy is fragmented and uncoordinated”, it is understood that this relates to Inverclyde Council's overall policy approach to tourism, not specifically Policy 27 in the Plan. It is considered that Policy 27 provides a coherent approach to tourism development by safeguarding existing tourism related facilities and supporting new development proposals in appropriate locations. It is considered that a modification to the Plan is not required in relation to these matters.

#### Efficient energy and waste innovations within business environments (411)

The Plan includes several policies which promote energy efficient technologies within new development, which by any reasonable interpretation would include business environments.

Policy 4 – Supplying Energy supports, in principle, infrastructure proposals for the generation, storage or distribution of heat and electricity where they contribute to a reduction in greenhouse gas production.

Policy 5 – Heat Networks requires major development applications to consider the feasibility of meeting the developments heat demand through a district heating network or other low carbon alternatives. In addition, the policy requires proposed developments located adjacent to significant heat sources or proposed /existing heat networks to be capable of connecting to them.

Policy 6 – Low and Zero Carbon Generating Technology requires all new buildings\* (\*subject to stated exceptions) to include low and zero carbon generating technology.

It is considered that a modification to the Plan is not required in relation to this matter.

It is accepted that the Plan does not explicitly support opportunities for integrating efficient waste innovations within new development. The Council is therefore not opposed to the last sentence of Policy 7 – Waste Reduction and Management being amended to read:

“Where applicable, the design and layout of new development should demonstrate efficient waste management, including enabling the separation, storage and collection of waste in a manner that promotes the waste hierarchy”.

#### Minerals Extraction (411)

The Council is unaware of any workable mineral resources within Inverclyde. To clarify this, the Council is not opposed to the following being added to the end of the first sentence of paragraph 9.9: “, and the Council is unaware of any workable mineral resources within the Council area.”

#### Flood Risk (93)

It is accepted that the LDP does not currently identify which development opportunity sites require a Flood Risk Assessment. The Council considers this is best addressed by the Action Programme being modified to include all development opportunity sites, with Flood Risk Assessments referred to where required. Reference can also be made in a future Supplementary Guidance on Development Briefs.

It is noted that SPP identifies sites used for holiday or short-let caravans and camping to be most vulnerable to flood risk. The issue of flood risk is addressed through Policy 8 – Managing Flood Risk, which applies to all development proposals.

It is considered that a modification to the Plan is not required in relation to these matters.

#### West College Scotland (494)

With regard to the request for the Plan to recognise the significant role which West College Scotland plays in the economic and commercial success of Inverclyde, this matter is addressed in Issue 4 - Our Towns, Villages and Countryside.

#### E3 Newark Street, Port Glasgow (460)

The area of woodland bordering the E3 site is identified as open space in the Proposals map and safeguarded under Policy 35 – Open Spaces and Outdoor Sports Facilities. Opportunities for new development proposals (i.e. E3) to contribute to the enhancement of this open space will be assessed under Policy 36 – Delivering Green Infrastructure through New Development. It is considered that a modification to the Plan is not required in relation to this matter.

#### E9 - Main Street (53)

Concern about the impact of the E9 allocation on residential amenity and property values is noted. Policy 1- Creating Successful Places addresses this issue by requiring that “In preparing development proposals consideration must be given to the factors set out in Figure 3”. Of particular relevance to residential amenity is the following factor in Figure 3 “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”. Site E9 is identified for Class 4 Business Use which should mean minimal impact on residential amenity. The impact of development on property value is not a material consideration in planning matters. It is considered that a modification to the Plan is not required in relation to this matter.

#### E12 Ingleston Street (460) (484)

It is accepted that a Tree Survey should inform the future development of the site. It is also accepted that protected species surveys, including bats and breeding bird surveys, should be provided by the developer as part of a future planning application. The Council is not opposed to the Action Programme being modified to include all development opportunity sites, with a Tree Survey and protected species surveys, including bats and breeding bird surveys, required actions for the E12 allocation.

#### Proposals Map (Inverclyde Council)

The Council is not opposed to the Proposals Map being amended to reflect the Written Statement with regard to business/industrial site designation. The required changes are:

- Change designation of land at Inchgreen, Greenock from (a) to (b)
- Change designation of land at Pottery Street, Greenock from (a) to (d)
- Change designation of land at Ocean Terminal, Greenock from (a) to (c) (Production)

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

Issue 12	Our Historic Buildings and Places	
Development plan reference:	Section 10, Policies 28 - 32	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Scottish Environment Protection Agency (SEPA) (93) Scottish Government (411) Historic Environment Scotland (HES) (426) Kilmacolm Community Council (443) Jane Conway (552)		
Provision of the development plan to which the issue relates:	Protection of historic buildings and places in Inverclyde	
Planning authority's summary of the representation(s):		
<u>Scottish Environment Protection Agency (SEPA) (93)</u> <ul style="list-style-type: none"><li>It is expected that any proposals should be considered in line with SEPA's development management guidance.</li></ul> <u>Scottish Government (411)</u> <ul style="list-style-type: none"><li>Policy 31 (Scheduled Monuments and Archaeological Sites) should refer to development having an adverse effect on the setting of a Scheduled Monument rather than the monument itself.</li></ul> <u>Historic Environment Scotland (HES) (426)</u> <ul style="list-style-type: none"><li>Existing policies are robust and it is not clear why they are to be modified. Some of the amended policies are missing appropriate detail and others do not have clear frameworks for decision making.</li><li>Policy 31 (Scheduled Monuments and Archaeological Sites) does not refer to adverse impact on the setting of the Scheduled Monument.</li><li>Policy 28 (Conservation Areas) does not provide a clear management framework for the demolition of unlisted buildings in conservation areas.</li><li>Policy 29 (Listed Buildings) does not provide a clear framework by which demolition cases can be assessed.</li><li>Welcome removal of external policy and guidance from the LDP policies</li><li>Welcome the spatial strategy to capitalise on, and protect the historic environment.</li></ul> <u>Kilmacolm Community Council (443)</u> <ul style="list-style-type: none"><li>The Historic Buildings and Places policies are all appropriate for Kilmacolm but Policy 28 (Conservation Areas) especially needs to be defended rigorously to protect the</li></ul>		

character and setting of the village.

Jane Conway (552)

- In general, the Plan fails to recognise the cultural heritage of towns and villages on the banks of the river and historic views.

**Modifications sought by those submitting representations:**

- Amend the wording to Policy 31 to read:  
“Development that would potentially have an adverse effect on the setting of a Scheduled Monument will only be permitted in exceptional circumstances.” (411)
- Amend the wording to Policy 31 to read:  
“Development that would have an adverse effect on a Scheduled Monument or the integrity of its setting will only be permitted in exceptional circumstances.  
Development affecting archaeological sites should seek to preserve the archaeological resource in situ.” (426)
- Amend the wording to Policy 28 to read:  
“Where the demolition of an unlisted building is proposed, consideration should be given to the contribution the building makes to the character and appearance of the conservation area. If a building makes a positive contribution to the area, there is a presumption in favour of retaining it.” (426)
- Alternatively the Council could revert back to the wording of Policy HER2 with the removal of any reference to external guidance. (426)
- Amend the wording of Policy 29 to read:  
“Demolition of a listed building will not be permitted unless the building is no longer of special interest, is clearly incapable of repair or there are overriding environmental or economic reasons in support of demolition. It must be satisfactorily demonstrated that every effort has been made to secure the future of the building before demolition is considered.” (426)
- Include a policy to protect the coastline and historical views at Gourock Bay and Gourock promenade. (552)

**Summary of responses (including reasons) by planning authority:**

Amendment to wording of Policy 31 (Scheduled Monuments and Archaeological Sites (411) (426)

The Council acknowledges that the inclusion of a reference to the setting of the Scheduled Monument would increase the protection afforded by Policy 31 and would accord with Scottish Planning Policy, paragraph 145. The Council is not opposed to the wording of Policy 31 being amended to:

“Development that would have an adverse effect on a Scheduled Monument or the integrity of its setting will only be permitted in exceptional circumstances.  
Development affecting archaeological sites should seek to preserve the archaeological resource in situ.”

Amendment to wording of Policy 28 (Conservation Areas) (426)

Policy 28 as written covers all development and demolition in Conservation Areas, including demolition of unlisted buildings. It is not considered necessary or appropriate to



focus on demolition of unlisted buildings in the policy, or to restate Scottish Planning Policy within Policy 28, as this will be referred to should such a proposal arise. It is not considered that any modification to the Plan is required in relation to this matter.

Amendment to the wording of Policy 29 (Listed Buildings) (426)

The Council acknowledges that it would be helpful to set out in Policy 29 a framework within which proposals for the demolition of listed buildings can be assessed. Therefore, the Council is not opposed to the deletion of the third sentence of the policy and its replacement with:

“Demolition of a listed building will not be permitted unless the building is no longer of special interest, is clearly incapable of repair or there are overriding environmental or economic reasons in support of demolition. It must be satisfactorily demonstrated that every effort has been made to secure the future of the building before demolition is considered.”

Inclusion of a policy to protect the coastline and views in Gourock (552)

The importance of the coastline and the views both outwards from Inverclyde and inwards along the river are deemed to be distinctive and make up one of the six qualities identified in Figure 3, page 7 to be considered when assessing all development proposals. It is not considered that any modification to the Plan is required in relation to this matter.

**Reporter's conclusions:**

**Reporter's recommendations:**

Issue 13	Our Natural and Open Spaces	
Development plan reference:	Section 11.0, Pages 38-43	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Victor Canata (5) sportscotland (9) Forestry Commission Scotland (31) Scottish Environment Protection Agency (SEPA) (93) Inverclyde Local Access Forum (147) Stuart McMillan MSP (286) Scottish Government (411) Woodland Trust Scotland (460) Anthony Murray (468) Christina Forbes (475) Kilmacolm Residents Association (481) Scottish Natural Heritage (SNH) (484) Elizabeth Forbes (489) Inverclyde Community Development Trust (491) Jane Conway (552)		
Provision of the development plan to which the issue relates:	Biodiversity and Geodiversity (Policy 33) Trees, Woodland and Forestry (Policy 34) Open Spaces and Outdoor Sports Facilities (Policy 35) Delivering Green Infrastructure Through New Development (Policy 36) Clyde Muirshiel Regional Park (Policy 37) Path Network (Policy 38) Water Environment (Policy 39)	
Planning authority's summary of the representation(s):		
<u>Victor Canata (5)</u> <ul style="list-style-type: none"><li>Remove the open space designation from the site along Dunvegan Avenue (see map attached to representation). The eastern part of the site has planning permission for a single house, with construction currently underway, while the western part is presently used as a private garden.</li></ul> <u>sportscotland (9)</u> <ul style="list-style-type: none"><li>Support the wording of Policy 35, which reflects SPP's provision on outdoor sports facilities.</li><li>There is a full size sports pitch on the R4 allocation site (Former St Stephen's High School). sportscotland would be a statutory consultee on any proposals involving the loss of these outdoor facilities under the Development Management (2013) Regulations and the provisions of SPP.</li></ul> <u>Forestry Commission Scotland (31)</u>		

- Pleased with the content and Policy 34 – Trees, Woodland and Forestry.

#### Scottish Environment Protection Agency (SEPA) (93)

- Support the inclusion of Policy 33 – Biodiversity and Geodiversity and welcome the requirement for new development to conserve and enhance biodiversity.
- Support the inclusion of Policy 34 – Trees, Woodland and Forestry and welcome the link to Supplementary Guidance.
- Support the inclusion of Policy 35 - Open Spaces and Outdoor Sports Facilities and welcome the link to Supplementary Guidance.
- Support the inclusion of Policy 36 – Delivering Green Infrastructure through New Development and welcome the link to Supplementary Guidance.
- Welcome the requirement to provide waterfront access set out in Policy 38 – Path Network. We expect any proposals to be considered in line with our development management guidance.
- Policy 39 should be amended to ensure that appropriately sized buffer strips are provided between developments and watercourses.
- Any proposals relating to Clyde Muirshiel Regional Park should be considered in line with SEPA development management guidance.

#### Inverclyde Local Access Forum (147)

- Access to the water for launching and egress (emergency or planned) of small non-motorised craft is very important in our coastal community. Request that this is taken into account in all future coastal developments.

#### Stuart McMillan MSP (286)

- Would welcome a common sense approach to trees and development, especially where views are affected by trees covered by Tree Preservation Orders or are within conservation areas. The Council planning system giving priority to trees over outlook should be re-examined.

#### Scottish Government (411)

- Policy 38 requires new paths only where applicable. This does not go as far as SPP (para 273) would suggest in terms of promoting opportunities for active travel.

#### Woodland Trust Scotland (460)

- The wording of Policy 33 – Biodiversity and Geodiversity needs to be stronger and clearer to offer adequate protection to designated sites.
- In the non-designated sites section of Policy 33 it should state that new development should contribute to furthering the conservation of biodiversity.
- In line with Scottish Planning Policy, paragraph 196, designated sites should be identified.
- Better protection is required for ancient woodland.
- Planning authorities should prepare a forestry and woodland strategy and supplementary guidance on forestry and woodland in the area.
- Welcome Policy 36 – Delivering Green Infrastructure Through New Development.
- Native trees and hedges should be considered as part of Green Infrastructure.

- Safeguarding existing high quality greenspace and the provision of new greenspace can contribute to the successful regeneration of places and brownfield sites.

#### Anthony Murray (468)

- Formally objects to anything that destroys the wildlife including birds and grasses referred to in the LNCS Assessment.
- No reference to herons on River Gryffe

#### Christina Forbes (475)

- Supports sustainable development in rural areas.
- Agrees with recognition of further Local Nature Conservation Sites in Kilmacolm.

#### Kilmacolm Residents' Association (481)

- The classification of West of Quarry Drive and Planetreeyetts as Local Nature Conservation Sites should be fully explored.

#### Scottish Natural Heritage (SNH) (484)

- Policy 33 – Biodiversity and Geodiversity. Wording relating to Natura 2000 sites should refer to a), b) and c), not a), b) or c).
- The wording of the section of Policy 33 on Protected Species should be simplified.
- The inclusion of the West Renfrew Hills Local Landscape Area is welcomed but the wording of the section of Policy 33 on Local Landscape Areas requires more detail.
- Policy 34 – Trees, Woodland and Forestry should reference Scottish Government's Control of Woodland Removal Policy.
- Reference could be made in the Plan to Supplementary Guidance on Development Affecting Trees ensuring it has statutory weight.
- Policy 36 – Delivering Green Infrastructure through New Development requires development proposals to accord with relevant Supplementary Guidance. The relevant Supplementary Guidance should be referenced in the policy to ensure there is a sufficient hook to give it statutory weight.
- Given Inverclyde's position on the River Clyde, the Plan should ensure that development proposals align with the forthcoming Clyde Regional Marine Plan and Scotland's National Marine Plan.
- Policy 37 – Clyde Muirshiel Regional Park – while we welcome the alignment of this policy with the Clyde Muirsheil Regional Park, the Park's statutory purpose of providing recreational access to the countryside could be added to the text.

#### Inverclyde Community Development Trust (491)

- The Core Path Network should be extended from Kilmacolm Road to the Broomhill and Drumfrochar Priority Place, along the route shown in Appendix 1 of the representation.
- Request that the new paths installed by Clyde Muirsheil Regional Park (shown in green on the representation map) be added to the Core Paths Plan.

#### Jane Conway (552)

- Would like to see a commitment to undertaking an audit of open space of recreational

value, particularly in Gourrock, to halt the loss of the town's already limited parks and open space.

**Modifications sought by those submitting representations:**

- Remove the open space designation from the site along Dunvegan Avenue (see representation for map). (5)
- Policy 39 should be amended to ensure the provision of appropriately sized buffer strips between developments and watercourses (93)
- Policy 38 should be clearer about when new paths will and will not be required. (411)
- Native trees and hedges should be considered as part of Green Infrastructure (460)
- Would like to see the Plan reference, perhaps under Policy 36 – Delivering Green Infrastructure through New Development, that green infrastructure can contribute to the successful regeneration of places and brownfield sites. (460)
- Amend Policy 33 – Biodiversity and Geodiversity Protected Species section to include: “Where development is likely to negatively impact on a designated site and/or protected species, the planning authority must protect the site from the adverse impacts of development.” (460)
- A provision of Policy 33 Non-designated Sites section should be that new development should contribute to furthering the conservation of biodiversity. (460)
- A map should be provided separate from the Proposals Map showing only the designated sites and not the development sites. (460)
- Amend Policy 34 to contain the additional wording: (460)  
“Development likely to cause disturbance should be located away from ancient or semi-natural woodland, particularly those likely to modify local hydrological function. Where development is located near to ancient or highly bio-diverse woodland, buffer zones should be retained to reduce the distance that disturbance penetrates. If possible, access to the woodland should be limited or managed.”
- Amend Policy 34 (c) to state: (460)  
“Ancient woodland sites are irreplaceable, and therefore any loss of these cannot be mitigated for by any new planting. In instances where new compensatory planting is required, the tree stock should be native trees which are UK sourced and grown. Further details of such provisions and requirement should be listed in the supplementary guidance on trees, woodland and forestry which will be prepared as part of this LDP.” (460)
- A forestry strategy should be prepared which:
  - Includes areas of woodland of high value to nature and therefore should be protected;
  - Identifies additional areas for forestry and woodland creation;
  - Sets clear targets for native tree planting; and
  - States that all trees planted should be UK sourced and grown for biosecurity reasons Identifies the current states of ancient woodlands and provides clear action for restoring and enhancing these woodlands. (460)
- Amend Policy 33 – Biodiversity and Geodiversity Natura 2000 sites wording to read: “Proposals will only be permitted if the assessment demonstrates that there will be no adverse effect on the integrity of the site or if:
  - There are no alternative solutions;
  - There are imperative reasons of overriding public interest including those of a social or economic nature; and
  - Compensatory measures are provided to ensure that the overall coherence of the Natura network is protected.
 In such cases Scottish Ministers must be notified.” (484)

- Amend Policy 33 Protected Species wording to read:  
“Development affecting protected species will only be permitted where:
  - It accords with the relevant legislation;
  - All relevant licencing tests are passed;
  - The level of protection afforded by legislation must be factored into the planning and design of the development; and
  - Any impacts must be fully considered prior to the determination of the application.” (484)
- Amend Policy 33 to provide text in relation to landscape and visual assessments such as:  
“Where there is potential for development to result in a significant adverse landscape /visual impact, a landscape and visual impact assessment will be required.” (484)
- Policy 34 – Trees, Woodland and Forestry should accord with Scottish Government’s Control of Woodland Removal Policy through the inclusion of wording such as:  
“In all cases, the acceptability of woodland removal and the requirement for compensatory planting will be assessed against the criteria set out in the Scottish Government’s Control of Woodland Removal Policy.” (484)
- Policy 34 – should contain a hook to the Supplementary Guidance through the inclusion of wording such as:  
“Development Proposals will be assessed against the Development Affecting Trees Supplementary Guidance.” (484)
- Amend Policy 36 – Delivering Green Infrastructure through New Development to read:  
“The Council supports the integration of green infrastructure....that accords with Delivering Green Infrastructure through New Development Supplementary Guidance”. (484)
- Policy 37 - Add the following to the criteria “Proposals for a development within Clyde Muirshiel Regional park must have regard for.....the Park’s statutory purpose of providing recreational access to the countryside”. (484)
- Amend Policy 39 – Water Environment to read:  
“Development proposals affecting the water environment will be required to safeguard and improve water quality and the enjoyment of the water environment by.....supporting the strategies and objectives of Scotland’s National Marine Plan and the forthcoming Clyde Regional Marine Plan”. (484)
- Extend Core Path Network from Kilmacolm Road to the Broomhill and Drumfrochar Priority Place, along the route shown in Appendix 1 of representation. (491)
- Request that the new paths installed by Clyde Muirshiel Regional Park (shown in green on the representation map) be added to the Core Paths Plan. (491)
- Would like to see a commitment to undertaking an audit of open space of recreational value, particularly in Gourrock, to halt the loss of the town’s already limited parks and open space. (552)

#### **Summary of responses (including reasons) by planning authority:**

##### Dunvegan Avenue (5)

An area of designated open space and Local Nature Conservation Site was granted planning permission for a dwellinghouse following a Local Review (Production). If the Reporter considers it appropriate, the Council is not opposed to the developed part of the site being removed from the open space designation and identified as residential area.

##### Open Spaces and Outdoor Sports Facilities (9) (552)



sportscotland would be a statutory consultee on any proposals involving the loss of the outdoor facilities associated at the Former St Stephen's High School site (R4)

The Council completed an audit of all open spaces identified in the adopted LDP in 2015. This assessed the distribution and quality of open space provision in the Plan. The audit will be used to inform the development of an Open Space Strategy, which is scheduled for preparation during 2019. It is considered that modifications to the Plan are not required in relation to these matters.

#### Policy 36 – Delivering Green Infrastructure through New Development (484)

It is accepted that Policy 36 should be amended to explicitly state the relevant piece of Supplementary Guidance referred to in the policy. The Council is not opposed to Policy 36 being amended as follows:

“The Council supports the integration of green infrastructure into new development and will require green infrastructure to be provided in accordance with Delivering Green Infrastructure through New Development Supplementary Guidance”.

#### Green Infrastructure (General) (460)

It is not considered that there is a specific need to reference trees and hedges as green infrastructure. However, if the Reporter is so minded, the Council is not opposed and would suggest that the easiest place to include a reference is in the first sentence of Paragraph 11.19.

Policy 1 – Creating Successful Places highlights the role of existing and new greenspace in the regeneration of places and brownfield sites by requiring all development proposals to give consideration to the factors set out in Figure 3, specifically “retain locally distinct built or natural features; use native species in landscaping, and create habitats for wildlife; incorporate green infrastructure and provide links to the green network”. It is considered that no modification to the Plan is required in relation to this matter.

#### Policy 37 – Clyde Muirsheil Regional Park (484)

It is considered that the policy, by having regard to the Clyde Muirsheil Regional Park Strategy, supports the Park's statutory purpose of providing recreational access to the countryside”. It is considered that no modification is required in relation to this matter.

#### Policy 38 - Path Network (411)

The term ‘where applicable,’ is included in Policy 38 as there are clearly some development proposals that would not require new paths to be created, for example changes of use, extensions, gap sites. Through Policy 38 and Policy 10, the Council considers that it is promoting and requiring paths as part of new development. It is considered that no modification is required in relation to this matter.

#### Path Network (General) (93) (491)

It is noted that proposals which provide waterfront access should be assessed in line with SEPA's development management guidance.

Any proposed changes to the Core Path Network and Core Paths Plan should be

addressed through the Core Paths Plan review process. The Local Development Plan simply reflects the content of the Core Paths Plan and is not the appropriate document for considering and making changes to the Core Path Plan and Network. It is not considered that modifications to the Plan are required in relation to these matters.

#### Policy 39 - Water Environment (93) (484)

It is accepted that Policy 39 should ensure that appropriately sized buffer strips are provided between developments and watercourses. The Council is not opposed to the following criterion being added to Policy 39, as appropriate:

“providing appropriately sized buffer strips between development and watercourses, in line with SEPA guidance”.

It is accepted that Policy 39 should reference and align with the forthcoming Clyde Regional Marine Plan and Scotland's National Marine Plan. The Council is therefore not opposed to the following criterion being added to Policy 39, as appropriate:

“supporting the strategies and objectives of Scotland's National Marine Plan and the forthcoming Clyde Regional Marine Plan”.

#### Water Environment (General) (147)

Access to coastal waters for the launching or egress of small non-motorised craft is addressed by Policy 39, which states that:

“development proposals will be required to safeguard and improve water quality and the enjoyment of the water environment by: (criterion f)...providing access to the water and waterside, where appropriate”. It is considered that a modification to the Plan is not required in relation to this matter.

#### Views Affected by Trees (286)

Tree Preservation Orders are made to protect individual trees, groups of trees or woodlands which have a particular amenity value, make a significant contribution to the landscape or townscape or because there may be a potential threat to the trees. This assessment, rightly, does not include an assessment of the impact of trees on views. This does not mean that the planning system gives priority to trees over outlook, it is simply that when trees are considered worthy of protection for their amenity value, a preservation order will be served on them. Tree Preservation Orders are not applied via the Local Development Plan, it simply reflects the Tree Preservation Orders that are in place. Anyone who considers themselves adversely affected by a Tree Preservation Order can request to the Council that it is removed. It is not considered that any modification to the Plan is required on this matter.

#### Kilmacolm, Local Nature Conservation Sites (475, 481)

The Council undertook a study of the nature conservation value of a number of sites around Kilmacolm and Quarriers Village (Production). This has resulted in a number of new and extended Local Nature Conservation Sites being included in the Plan. It is not considered that any modification to the Plan is required on this matter.

#### Biodiversity and Geodiversity (460)(468)(484)

Policy 33 refers to the conservation and enhancement of biodiversity in the sections

relating to Natura 2000 sites, Protected Species and Non-designated Sites which meets the request of (460) that the Policy should require that development should contribute to furthering and enhancing biodiversity. A clear purpose of Policy 33 is to protect designated sites and protected species. It is not, therefore, considered that any modification to the Policy is required to further emphasise this.

International, national and locally designated sites are clearly identified on the Proposals Map. It is not a requirement of the Plan to show designated sites on a separate map. The Proposals Map shows the designated sites alongside the proposed development sites to highlight the potential of impact from development proposals. A separate map 'Environmental Designations and Constraints'; an update of the current 'Environmental Constraints Map', will be made available on the Council's website, but not as part of the Plan. Consideration will be given to including ancient and native woodland on this. It is, therefore, not considered that any modification is required.

The Council is not opposed to amending the wording of Policy 33 to replace 'or' with 'and' between points b) and c) of the Natura 2000 sites section to read:

"Proposals will only be permitted if the assessment demonstrates that there will be no adverse effect on the integrity of the site or if:

- There are no alternative solutions;
- There are imperative reasons of overriding public interest including those of a social or economic nature; and
- Compensatory measures are provided to ensure that the overall coherence of the Natura network is protected.

In such cases Scottish Ministers must be notified."

This would require all three criteria to be met thus adequately strengthening Policy 33 and ensuring it accords with Scottish Planning Policy.

Regarding Policy 33 Protected Species section, the Council does not consider it helpful to the user for the policy to cross-refer to other legislation for the policy to be understood. It is considered that by referring to the licensing test criteria the Plan makes it clearer to the user of the policy what matters will be taken into consideration in making a decision. The Council's position therefore is that the plan should not be modified. However, if the Reporter is minded to make the modification to the Policy as suggested by SNH, the Council is not opposed, but it is considered that additional information on the relevant legislation and licensing would be required in the narrative preceding the policy.

The Council is not opposed to the Plan making reference to a requirement for landscape and visual impact assessments. It is considered that this is best placed in the text preceding Policy 33, and would not be opposed to the following sentence being added to the end of paragraph 11.8:

"Where there is potential for development to result in a significant adverse landscape and/or visual impact, a landscape and visual impact assessment will be required."

#### Trees, Woodland and Forestry (460), (484)

Regarding Policy 34 Trees, Woodland and Forestry, the wording suggested by (460) relating to development affecting ancient and semi-natural woodland and compensatory planting is too detailed for inclusion in the Policy and can be included in the Supplementary Guidance on Development Affecting Trees which will be produced by the Council and is referred to in the Policy. Forestry Commission Scotland (31) has also

stated it is pleased with the content of Policy 34. It is not considered that any modification is required.

Inverclyde is covered by the Glasgow and the Clyde Valley Forestry and Woodland Strategy, 2016, and a revised version of this strategy is currently under review prior to its publication as supplementary guidance to the Strategic Development Plan. This document addresses tree planting targets and identification of appropriate space for woodland creation which have been requested in the Plan by (460), as well as the requirement for a Forestry Strategy for Inverclyde.

The Plan makes reference to the Scottish Government's Control of Woodland Removal policy in paragraph 11.11. This is a separate policy test and it is not considered necessary or appropriate to include a reference to it in Policy 34 as requested by (484). It is not considered that any modification to the Plan is required on these matters.

Representation (484) requests that the wording of Policy 34 is amended to provide a hook between the Policy and the Supplementary Guidance on Development Affecting Trees. The Supplementary Guidance is referred to in Policy 34 as well as in paragraph 11.13 of the Trees, Woodland and Forestry section. The Council is not opposed to the title of the Supplementary Guidance - Development Affecting Trees being inserted in front of the reference to Supplementary Guidance in Policy 34 and paragraph 11.13 in order to strengthen the reference to the Supplementary Guidance.

<b>Reporter's conclusions:</b>
<b>Reporter's recommendations:</b>

Issue 14	General	
Development plan reference:	Various	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<div>David Nish (56)</div> <div>Health and Safety Executive (57)</div> <div>Network Rail (288)</div> <div>Inverclyde Health and Social Care Partnership (294)</div> <div>Euan Darroch (301)</div> <div>Margaret Swan (302)</div> <div>Deborah Gilmour (305)</div> <div>Anne Marie Meldrum (311)</div> <div>Angus Meldrum (313)</div> <div>Sandy Meldrum (319)</div> <div>McInally Associates Ltd for Peel Land and Property (343)</div> <div>Scottish Water (358)</div> <div>Stuart Lang (384)</div> <div>Bill Crookston (389)</div> <div>Hilary Darroch (391)</div> <div>Donald Miller (393)</div> <div>Erica Kerr (433)</div> <div>Valerie Crookston (434)</div> <div>Brian Adamson (441)</div> <div>Laura Adamson (444)</div> <div>Woodland Trust Scotland (460)</div> <div>Anne Louise Tait (470)</div> <div><a href="#">Scottish Natural Heritage (484)</a></div> <div>Karen Tolan (555)</div> <div>Strathclyde Partnership for Transport (556)</div> <div>Christopher Curley (559)</div>		
Provision of the development plan to which the issue relates:	Various	
Planning authority's summary of the representation(s):		
<div><a href="#">David Nish (56), Erica Kerr (433)</a></div> <div><ul style="list-style-type: none"><li>Support the Plan's approach as it relates to Kilmacolm</li></ul></div> <div><a href="#">Health and Safety Executive (57)</a></div> <div><ul style="list-style-type: none"><li>There are HSE licensed explosive sites in Inverclyde which have safeguarding consultation zones. Consultation with HSE is required for development within safeguarding zones.</li></ul></div>		

#### Network Rail (288)

- 'Developer Contributions' should be added to the list of Supplementary Guidance under Accompanying and Supporting Documents (page 2)

#### Inverclyde Health and Social Care Partnership (294)

- While the Plan refers to accessibility in relation to 'how easy it is for people to get to a site by all modes of transport', it does not refer to the accessibility of an area for those who experience disabilities.
- The Plan references the 'Affordable Housing Delivery Programme'. This should be changed to the 'Affordable Housing Supply Programme'.

Euan Darroch (301) Margaret Swan (302) Deborah Gilmour (305) Anne Marie Meldrum (311) Angus Meldrum (313) Sandy Meldrum (319) Stuart Lang (384) Bill Crookston (389) Hilary Darroch (391) Donald Miller (393) Valerie Crookston (434) Brian Adamson (441) Laura Adamson (444) Anne Louise Tait (470) Karen Tolan (555)

- Support the LDP

#### McInally Associates Ltd for Peel Land and Property (343)

- Show the boundary between the affordable housing allocation on James Watt Dock East (R15) and the private housing allocation on JWD/Garvel Island (R16) on the LDP Proposals Map.

#### Scottish Water (358)

- We are keen to continue to support the delivery of Inverclyde's Local Development Plan and work closely with Inverclyde Council, particularly with respect to the requirements for Drainage Impact Assessments and early engagement with the Council and developers on the Glasgow City Region City Deal, Affordable Housing Delivery Programme, Policy 3 – Priority Places, Policy 8 – Managing Flood Risk, Policy 9 – Surface and Waste Water Drainage, Section 7.0 Our Homes and Communities, and a number of the Priority Places in Schedule 2 and housing development opportunity sites identified in Schedule 3.

#### Woodland Trust Scotland (460)

- While the aim of the Plan is good, it should also include achieving an outstanding quality of the natural environment, as this is part of making Inverclyde an overall attractive place for economic, social and environmental development. 'Our Natural and Open Spaces' and 'Tackling Climate Change', while listed in Figure 1, should also be mentioned in para 1.2 which sets out the overall aim of the Plan. The inclusion of all three pillars is key to developing sustainably.

#### Scottish Natural Heritage (484)

- Welcome the Plan's overall aim and support the 'Sustainable Development Strategy' aspect of the Plan and the aim to create success places.



- However, there is no reference made to the natural environment in relation to the Sustainable Development Strategy.
- The protection and enhancement of natural heritage features identified under 'Our Natural and Open Spaces' (i.e. Spatial Development Strategy) is rather specific and could be expanded upon.

#### Strathclyde Partnership for Transport (556)

- Supportive of the LDP plan and welcome the focus on directing development to accessible locations, improving access by sustainable modes, making best use of existing services and infrastructure and reducing reliance on private car trips where possible.

#### Christopher Curley (559)

- The LDP Proposals map shows a gap between the E8 allocation at Sinclair Street and the safeguarded area (25(a) at Ladyburn Business Park, Port Glasgow. This gap should be removed.

#### **Modifications sought by those submitting representations:**

- 'Developer Contributions' should be added to the list of Supplementary Guidance under Accompanying and Supporting Documents (page 2) (288)
- The Plan reference to 'Affordable Housing Delivery Programme' on page 8 should be changed to 'Affordable Housing Supply Programme'. (294)
- We wish the boundary between the affordable housing allocation on James Watt Dock East (R15) and the private housing allocation on JWD/Garvel Island (R16) to be shown on the LDP Proposals Map (343)
- The aim of the Plan should include wording on the environment, such as 'achieving outstanding quality of the natural environment'. (460)
- Amend the first heading of the Sustainable Development Strategy (page 1) to include reference to the natural environment, in line with para 29 of SPP. Suggest "Creating Successful and Sustainable Places by protecting and enhancing the natural heritage..." (484)
- Amend the sixth of the Spatial Development Strategy to read "Our Natural and Open Spaces support the protection and enhancement of our natural heritage features including .....landscape, green network....and the water environment including the Clyde"
- The gap between the E8 allocation at Sinclair Street and the safeguarded area (25(a) at Ladyburn Business Park, Port Glasgow, as shown on the Proposals map, should be removed. (559)

#### **Summary of responses (including reasons) by planning authority:**

##### The Aim of the LDP (460)

Para 1.2 states that "the overall aim of the Plan is to contribute towards Inverclyde being an attractive and inclusive place to live, work, study, visit and invest, now and in the future, particularly through encouraging investment and new development, which is sustainably designed and located and contributes to the creation of successful places". It is considered that this aim includes the three pillars of sustainability; i.e. economic, social and environmental. It is therefore not necessary or appropriate to explicitly highlight the natural environment. It is considered that a modification to the Plan is not required in

relation to this matter.

#### Sustainable Development Strategy/Spatial Development Strategy

It is considered that the protection and enhancement of the natural environment is fully addressed under heading six of the Spatial Development Strategy, which states that “Our Natural and Open Spaces – to support the protection and enhancement of our important habitats and species, wider biodiversity, trees and woodlands, open spaces and playing fields, the path network, Clyde Muirshiel Regional park, and the water environment”.

It is considered that a modification to the Plan is not required in relation to this matter.

#### Accompanying and Supporting Documents (288)

The request for Supplementary Guidance on Developer Contributions to be added to the list of accompanying and supporting documents (page 2) to the Plan is addressed in Issue 3 – Connecting People and Places.

#### Text Corrections (294)

The Council is not opposed to the ‘Affordable Housing Delivery Programme’ referenced on page 8 being modified to ‘Affordable Housing Supply Programme’.

#### Changes to the Proposals Map (343) (559)

The Proposals map shows the overall boundary of all Priority Places, with the Supplementary Guidance on Priority Places setting out, textually and visually, the detailed planning strategies. It is considered unnecessary to delineate the boundaries of the R15 and R16 allocations as these are clearly shown in the Supplementary Guidance on Priority Places, specifically Diagram 2. It is considered that a modification to the Plan is not required in relation to this matter.

The representation refers to an area of land between Business and Industrial opportunity E8 and the existing business and industrial area to the immediate east. There is an area of land in between which has been identified as residential area, which continues eastwards along the north of the railway line. This should be identified as existing business and industrial area under Policy 25, and the Council is not opposed to the proposals Map being adjusted as per Production.

#### HSE Consultation (57)

It is established practice for the Health and Safety Executive to be consulted on development proposals within HSE safeguarding zones. It is considered that a modification to the Plan is not required in relation to this matter.

#### Accessibility (294)

Where the Plan is making reference to the accessibility of a site this is with regard to general accessibility i.e. by walking, cycling, public transport and private car (as per the Glossary) rather than specific reference to people with disabilities. It is considered that a modification to the Plan is not required in relation to this matter.

Scottish Water (358)

Scottish Water's support for the Plan and commitment to work with the Council on the policy areas and development sites identified in their representation is welcomed. It is noted that a requirement for Drainage Impact Assessments (DIA) has been identified for a number of Priority Places and development opportunity sites. This requirement, where relevant, will be identified in the Supplementary Guidance on Development Briefs.

**Reporter's conclusions:**

**Reporter's recommendations:**