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Municipal Buildings
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Our ref: LDP-280-2

3 April 2019

Dear Mr Williamson

**PROPOSED INVERCLYDE LOCAL DEVELOPMENT PLAN
THE TOWN AND COUNTRY PLANNING (DEVELOPMENT PLANNING)
(SCOTLAND) REGULATIONS 2008**

SUBMISSION OF THE REPORT OF THE EXAMINATION

We refer to our appointment by the Scottish Ministers to conduct the examination of the above proposed plan. Having satisfied ourselves that the planning authority's consultation and engagement exercises conformed with their participation statement our examination of the proposed plan commenced on 27 December 2018. We have completed the examination and now submit our report.

In our examination we considered all 14 issues arising from unresolved representations identified by yourselves to the Proposed Inverclyde Local Development Plan. In each case, we have taken account of the original representations, as well as your summaries of the representations and your responses to such, and we have set out our conclusions and recommendations in relation to each issue in our report.

The examination process included site inspections and requests for additional information from yourselves and other parties. We did not require to hold any hearing or inquiry sessions.

Subject to the limited exceptions as set out in Section 19 of the Town and Country Planning (Scotland) Act 1997 (as amended) and in the Town and Country Planning (Grounds for Declining to Follow Recommendations) (Scotland) Regulations 2009, you are now required to make the modifications to the plan as set out in our recommendations.

You should also make any consequential modifications to the text or maps which arise from these modifications. Separately, you will require to make any necessary



adjustments to the final environmental report and to the report on the appropriate assessment of the plan.

All those who submitted representations will be informed that the examination has been completed and that the report has been submitted to yourselves. We will advise them where the report will be available to view.

The documents relating to the examination should be retained on your website for a period of six weeks following the adoption of the plan by yourselves.

It would also be helpful to know when the plan has been adopted and we would appreciate being sent confirmation of this in due course.

Yours sincerely

David A Russell
Reporter

Sinéad Lynch
Reporter

**REPORT TO INVERCLYDE COUNCIL ON THE
PROPOSED INVERCLYDE
LOCAL DEVELOPMENT PLAN EXAMINATION**

Reporters: Sinéad Lynch BSc (Hons) MRTPI
David A Russell MPhil MRTPI

Date of Report: 03 April 2019

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Examination of Conformity with the Participation Statement

Introduction

1. Section 19(4) of the Town and Country Planning (Scotland) Act 1997 (as amended) requires the person who has been appointed by the Scottish Ministers to examine the plan: “firstly to examine...the extent to which the planning authority’s actions with regard to consultation and the involvement of the public at large as respects the proposed plan have conformed with (or have been beyond the requirements of) the participation statement of the authority which was current when the proposed plan was published under section 18(1)(a).”

The participation statement

2. As the proposed plan was published in April 2018, it was the August 2017 version of Inverclyde Council’s participation statement, published in conjunction with its development plan scheme, which was current at that time. The participation statement confirmed that:

“At various stages of preparing the next Plan, we will seek to involve the following....

- the local community including residents, community councils, community representatives, community organisations and other interested bodies
- the private sector (such as businesses, land and property owners and developers)
- the public sector (such as key government agencies, neighbouring local authorities, statutory bodies, and non-governmental organisations).”

3. The participation statement confirmed that the council would use a range of techniques to publicise and engage at various stages of preparing the next plan, and that these would include:

1. Making information and consultation documents available on the council’s website
2. Sending copies of relevant documents to key agencies, neighbouring and Clydeplan planning authorities
3. Updates on the council’s Facebook and Twitter pages
4. Contacting people on the LDP mailing list (email or letter) to provide updates at key stages
5. Statutory notices in local newspapers
6. Press adverts and/or press releases
7. Exhibitions at busy locations (e.g. libraries, leisure centres and council offices)
8. Presentations to community groups, where requested (e.g. community councils)
9. Notifying neighbours and owner/occupiers of sites included in the proposed plan
10. Meetings with stakeholders (e.g. key agencies such as the Scottish Environment Protection Agency and Scottish Natural Heritage)
11. Briefings for the LDP members working group
12. Reports to the council’s environment and regeneration committee
13. Planning staff available to answer queries or provide information in person or by telephone/email.

The council's report on conformity with the participation statement

4. The report on conformity submitted to the examination by the council confirmed what it had undertaken in relation to each of the techniques listed above during the consultation stage for the proposed plan, which was between April and June 2018:

1. It made the following information available to view and download from the Council's website:

- Inverclyde local development plan: proposed plan, proposals maps and four pieces of draft supplementary guidance
- Supporting documents (e.g. housing land technical report 2018 and equalities impact assessment)
- Information on the proposed plan consultation and how to respond
- Consultation response e-form.

2. The council notified the key agencies, Clydeplan and neighbouring planning authorities that it had published the proposed plan and supporting documents, and provided links to where these documents could be viewed and downloaded.

3. It used the council's Facebook site and Twitter pages to highlight the publication of, and consultation on, the proposed plan.

4. The council directly notified people on the LDP mailing, by either email or letter, of the proposed plan consultation.

5. It published a statutory notice of the proposed plan consultation in the Greenock Telegraph on the 4th May 2018.

6. It issued a press release for the proposed plan consultation on the 1st May 2018.

7. It displayed exhibition boards at the following locations for periods of three or four days in May and June 2018 during the proposed plan consultation:

- Inverclyde Council customer service centre, Greenock
- Central library, Greenock
- South-west library, Greenock
- Watt library, Greenock
- Oak Mall, Greenock
- Waterfront leisure complex, Greenock
- Port Glasgow library
- Port Glasgow swimming pool
- Port Glasgow health centre
- Gourock library
- Gourock health centre
- Kilmacolm library
- Inverkip community hub

8. The council gave presentations on the proposed plan to Kilmacolm Civic Trust and to the following community councils:

- Cardwell Bay and Greenock West
- Gourrock
- Kilmacolm
- Larkfield, Braeside and Branchton
- Port Glasgow West

9. It notified by letter all owner/occupiers (a total of 2,991) within 20 metres of development opportunity sites in the proposed plan.

10. Following the consultation on the proposed plan, it held meetings with stakeholders when requested. These included West College Scotland.

11. The LDP members officers working group met three times during the preparation of the proposed plan, between October and December 2017. These meetings provided an opportunity to brief members on the progress of the proposed plan and to discuss and resolve any issues arising.

12. The following reports were submitted to the environment and regeneration committee:

- Inverclyde Local Development Plan: Proposed Plan (8th March 2018). The report sought approval to publish the Proposed Plan and associated documents for consultation.
- Inverclyde Local Development Plan: Proposed Plan (28th March 2018). The report sought approval of the Inverclyde Local Development Plan Proposed Plan and accompanying documents, and to proceed to public consultation.
- Development Plan Update (25th Oct 2018). The report updated the committee on development plan coverage within Inverclyde, including preparation of the new local development plan, and sought approval of the 2018 development plan scheme and participation statement
- Inverclyde Local Development Plan' (25th Oct 2018). The report advised the committee on responses received to the consultation on the Inverclyde Local Development Plan: Proposed Plan (2018); provided Members with notice of the 'Schedule 4s' for submission to the Scottish Government for examination; and sought approval to submit the Proposed Plan to Scottish Government for Examination with the changes set out in Appendix 1.

13. The planning policy team responded to queries in person, by phone and email throughout the preparation of the plan.

5. In the appendices to the statement of conformity, the council provided:

- A copy of the statutory notice of the consultation stage for the proposed plan;
- Details of the dates on which the public exhibition was staged at the various locations;
- Images of the exhibition boards used; and
- An example of the updates on the proposed plan consultation which it posted on Facebook and Twitter.

The reporter's conclusions

6. I have considered the above information submitted by the council in its statement of conformity. I am satisfied that this demonstrates that the council's actions with regard to consultation and the involvement of the public at large as respects the proposed plan have conformed with those set out in the participation statement of the authority, dated August 2017, which was current when the proposed plan was published.

7. I therefore conclude that it is not necessary for me to submit a report to the Scottish Ministers under subsection (1) (b) of section 19A of the Act recommending that they should require the council to undertake further steps with regard to either consultation or public involvement as respects the proposed plan.

8. Accordingly, I will proceed with the examination of the local development plan.

David A. Russell

Principal Inquiry Reporter

5 December 2018

Issue 1	Creating Successful Places	
Development plan reference:	Section 3.0, Pages 6-10	Reporter: David Russell
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 (152) Scottish Prison Service (156) Garvel Clyde Ltd (157) Stuart McMillan MSP (286) Peel Land and Property (343) Lochailort Investments Ltd (350) Clydeport Operations Ltd (351) Wilson Dunlop (359) A Freel (367) T Miller (368) Maureen Cockburn (369) E McLellan (370) John Freel (371) Jean Mackinnon (372) Taylor Wimpey (West Scotland) Ltd (401) Persimmon Homes Ltd (417) Woodland Trust Scotland Ltd (460) 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 John Crowther (561) 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"> 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 not 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. 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 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.

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.

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.

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.

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.

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, art gallery and restaurant on Greenock waterfront (Document CD043). 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 (Document CD044) 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 – The planning application for the terminal building has been submitted and the Harbour Revision Order for marine works was published at the beginning of October 2018 following extensive engagement with Transport Scotland.
 - Inverkip infrastructure – Ongoing discussions with Scottish Power and Transport Scotland re design of roads access
 - Inchgreen, Greenock – Officers are working on proposals with a view to presenting a Strategic Business Case by the end of 2018.
- 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 (Document CD045), 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 (Document CD029). 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 (Document CD010). 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 (Document CD010). 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) – 1.65 miles; ND Primary (Aileymill) – 1.29 miles; RC Secondary (St Columba's) – 2.44 miles; RC Primary (St Andrew's) – 1.67 miles.
 - 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 (Document CD046), 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:Preliminary matters

1. My examination of the plan is limited by regulations to addressing only the unresolved issues which have been raised in representations. The council has listed above a number of matters raised in representations which are in support of the provisions of the plan, or which simply make comments and do not seek modifications to the plan. Therefore, unless these relate to an issue which is unresolved, they will not be addressed in my conclusions.
2. The correction of errors in map notations are a matter for the council.
3. In considering the conclusions and recommendations relating to the sites referred to under this issue, reference should also be made to the further conclusions concerning a number of these sites which are set out at Issues 6 and 7, later in this report.

Attractiveness of Inverclyde

4. I find that that this plan is already focused on seeking to make Inverclyde a more attractive place in which to live, work, study, visit and invest. It already benefits from very good rail services, not only within Inverclyde, but also connecting it to and from Glasgow and beyond. I conclude that no amendments are required in this respect.

Priority Projects and Priority Places (Policies 2 and 3)

5. The plan already sets out separate explanations of 'priority projects' and 'priority places' at paragraphs 3.5 and 3.10 respectively. I consider that this provides sufficient information for readers to understand the difference between them. In addition, the status of three of the priority projects which form part of the Glasgow City-Region City Deal is adequately explained. I conclude that an amendment to the plan in this respect is not required.
6. I am satisfied that Policy 22 sets out an appropriate framework to protect the role of Greenock town centre as a strategic centre when assessing any future proposals for Greenock Ocean Terminal, The Harbours or James Watt Dock that may involve retail uses.
7. I agree that the priority places listed in schedule 2 all provide large scale development opportunities which could have a transformational effect, not only on their surroundings, but also on the attractiveness of Inverclyde as a whole. These places are: The Harbours;

James Watt Dock/Garvel Island; the former Inverkip power station; Woodhall; Peat Road/Hole Farm; and Spango Valley.

8. They all offer significant opportunities for investment, mainly in mixed use developments with housing alongside other uses, on currently vacant brownfield sites. Securing their development would contribute not only to Inverclyde's re-population objective, but would also reduce the pressure for the release of greenfield land elsewhere.

9. Some obstruction of existing views across currently vacant land would inevitably arise from their re-development. However their detailed design can ensure that key views are maintained and that public access through the sites, and access to the waterfront, can be secured.

10. At The Harbours, I agree that the introduction of an educational institution, as proposed by West College Scotland, is unlikely to be compatible with the preferred strategy of a mixed use development here, due to the large scale land-take likely to be required. However I do consider that it would be appropriate to amend the reference in schedule 2 to 'marine-based business uses' to 'marine-related business and industrial uses' to reflect the intention of maintaining these existing uses here, within the overall re-development. I have not been provided with any evidence to assess whether there is scope at this location to accommodate facilities which may assist the growth of Ferguson Marine.

11. At James Watt Dock/Garvel Island, I also consider it appropriate that the current reference in schedule 2 to 'maritime commercial enterprises' as one of the acceptable uses as part of the preferred strategy for the mixed use development, should be amended to 'marine-related business and industrial uses'. This would provide for the currently operational business and industrial uses to be retained, including the dry dock.

12. I also agree that this 'priority place' will continue to represent an opportunity for the introduction or expansion of business or industrial uses. As such, it would be appropriate for Schedule 9 to refer to it, and I consider that the plan should be amended accordingly.

13. Neither the approved masterplan nor the current supplementary guidance for this site are matters for me to examine. The potential for conflict between different uses would be important considerations in assessing specific planning applications, but that is not a matter for this examination either. However I do accept that this 'priority place' provides an opportunity to create a distinctive and characterful neighbourhood which would be unique to Inverclyde, and which could enhance its image and contribute to its re-population.

14. Spango Valley is now a large scale redundant brownfield site. It was previously intensively used as an industrial facility by a major multi-national computer company over a long period, and also includes the former site of a secondary school. It enjoys direct access from the A78 trunk road and is served by its own rail station. The employment and financial benefits generated for Inverclyde and the surrounding area would have been substantial, and the local infrastructure supported it. The prospects of another single industrial user of similar scale being attracted to the site are slim.

15. In these circumstances, I consider that it is wholly appropriate that Spango Valley should be identified as a priority place for re-development, with a mix of uses as generally specified in schedule 2 as the preferred strategy for it. This would ensure a significant

element of employment generating uses, and also recognise the opportunity for a significant residential component as well, which has been confirmed in representations by a national house-builder.

16. I find no evidence of infrastructure or service constraints which would preclude the type of developments proposed, and the use of this large brownfield site would help to ease the pressures to release other greenfield land for development purposes. Concerns raised regarding potential flooding, subsidence, access, additional planting and amenity would be addressed in the consideration of specific planning applications, and more detailed advice on these matters can also be provided by the council in the proposed supplementary guidance for priority places.

17. The potential use of part of the site for park and ride was identified in representations, and I agree with the council that it would be appropriate that this should also be referred to in schedule 2. The alternative description for the proposed prison on the former Greenock High School site, for which planning permission in principle has been granted, is a matter for the council.

18. The re-development of land at Inchgreen, Greenock, which includes its dry dock, is confirmed in the plan as a priority project that is supported by the Glasgow City-Region City Deal and is proposed for marine-related industrial uses. This emphasises its potential to support local businesses and generate employment. If housing development is proposed nearby, the impact on residents of noise nuisance from these activities would be one of the matters to be taken into account, both in the design of the scheme and in any planning conditions imposed. I do not consider that any amendment to the plan is required in relation to this site.

19. The former Inverkip power station site provides a range of potential re-development opportunities, given its coastal location on the Firth of Clyde. However I do not consider the council's preferred strategy of a residential-led mixed use development, which incorporates elements of leisure and recreational uses, is inappropriate.

20. The site adjoins Wemyss Bay, it benefits from direct access off the A78, and it is not far from the rail stations at both Wemyss Bay and Inverkip. It is another large brownfield site, and its development is supported by the City Deal as a priority project under Policy 2. Its re-development would contribute to the re-population of Inverclyde as well as easing pressures for the development of greenfield sites. The benefits of additional planting to protect the adjoining ancient woodland can be addressed during the consideration of any planning application, and highlighted in any planning guidance that the council prepares for this site. I conclude that no amendment to the plan in respect of this site is required.

21. The site at Woodhall, Port Glasgow is also one of the 'priority places' for which Policy 3 confirms that there will be support for comprehensive re-development proposals which are in line with the preferred strategy that is set out in schedule 2. For Woodhall, that strategy is confirmed as 'housing with community facilities and neighbourhood retail.

22. However the site boundary incorporates an area of ancient woodland, and its inclusion within a proposal for comprehensive re-development for housing would be incompatible with the support for the retention of ancient woodland, set out at Policy 34. The council has suggested that the protection of the ancient woodland can be addressed in the supplementary guidance that it will prepare for the site.

23. However, I consider that this may not provide sufficient notice for potential developers. I conclude that the protection of the ancient woodland lying within the site should form part of the preferred strategy for Woodhall, and that schedule 2 should be amended accordingly.

24. The making of a tree preservation order to protect the ancient woodland is a matter for the council to consider separately from the preparation of this plan.

Reporter’s recommendations:

1. Modify Schedule 9 as it relates to Greenock, by inserting a new site reference “E9” for “James Watt Dock/Garvel Island”, showing the site area as “Indicative”, the preferred use as “Class 4, 5 and 6”, with additional information comprising “See Priority Places Supplementary Guidance”. Subsequent listed sites should be re-numbered accordingly.

2. Modify Schedule 2, as it relates to the ‘preferred strategy’ for Woodhall, Port Glasgow, by adding “...., and incorporating measures to protect the area of ancient woodland within the site.”

3. Modify Schedule 2, as it relates to the ‘preferred strategy’ for Spango Valley, Greenock, by adding “... park and ride, ...” after “appropriate leisure and recreation,”.

Issue 2	Tackling Climate Change	
Development plan reference:	Section 4.0, Pages 10-13	Reporter: David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>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)</p>		
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):		
<p><u>Homes for Scotland (89)</u></p> <ul style="list-style-type: none"> • 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. • National policy on heat networks in new residential developments is confused at best and ignores revisions to Building Standards. • 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. • Support for retrofitting low carbon heat to existing housing stock. <p><u>Scottish Environment Protection Agency (SEPA) (93)</u></p> <ul style="list-style-type: none"> • Welcome inclusion of Policy 9 Surface and Waste Water Drainage and specific reference to sewer connections and the requirement for SuDs schemes. • The provision of temporary/construction SuDs has not been addressed in Policy 9 – Surface and Waste Water Drainage. This requires to be modified. • 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. • Policy 8 Managing Flood Risk, criterion a) should include a specific definition of “at significant risk of flooding”. This should align with SPP. • The explicit link to Supplementary Guidance on Energy in Policy 4 is welcomed. • The positive approach of paragraph 4.7 and Policy 5 Heat Network is exemplary and is 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. (Document CD040) 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 (Document CD007), 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 (Document CD007) 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 (Document CD007). 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 (Document CD047), 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 (Document CD005) and Strategic Flood Risk Assessment (Document CD015) 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 the need for a 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:

Preliminary matters

1. My examination of the plan is limited by regulations to addressing only the unresolved issues which have been raised in representations. The council has listed above a number of matters raised in representations which are in support of the provisions of the plan, or which simply make comments and do not seek modifications to the plan. Therefore, unless these relate to an issue which is unresolved, they will not be addressed in my conclusions.

Tackling climate change

2. Scottish Planning Policy confirms at paragraph 157 that local development plans should support new build developments, infrastructure and retrofit projects which deliver energy efficiency. The policies of the plan seek to do this in relation to new developments and infrastructure. The council’s local housing strategy addresses issues and actions relating to improving the energy efficiency of existing houses, and I agree that it is the appropriate means of doing so, rather than the local development plan.

3. I agree that the final bullet point of paragraph 4.2 should reflect the figure of 70% now contained in the final version of the Climate Change Plan, approved in February 2018, relating to the proportion of the heat and cooling of non-domestic buildings which, by 2032, should be supplied by low or zero carbon generating technologies.

Policy 4 ‘Supplying energy’

4. Once adopted, supplementary guidance associated with a local development plan will form part of the statutory development plan. When a new local development plan is adopted, any previous supplementary guidance falls. However, if it remains up-to-date and there is a proper connection to it in the new plan, the planning authority may re-adopt it after consultation has taken place.

5. The council’s intention is to set out its spatial framework in its proposed supplementary guidance on energy. This is referred to in the plan at paragraph 4.6, although the reference should be made in the future tense. I am satisfied that this approach is consistent with the terms of paragraph 161 of Scottish Planning Policy, which simply indicates that a spatial framework for onshore wind farms should be set out in the development plan, rather than in the local development plan specifically.

Policy 5 'Heat Networks'

6. At paragraph 158, Scottish Planning Policy indicates that local development plans should use heat mapping to identify the potential for co-locating developments with a high heat demand with sources of heat supply. While heat mapping does not appear to have been undertaken as part of the preparation of this plan, Policy 5 will have a beneficial effect in requiring proposed developments to be capable of connecting with any adjacent significant heat source, or with a heat network. The latter requirement is not restricted to major developments. In these circumstances, I conclude that an amendment to the plan is not required in relation to heat mapping or heat networks.

Policy 6 'Low and zero carbon generating technology'

7. Every local development plan is required to include policies requiring all developments to be designed so as to ensure that all new buildings avoid a specified and rising proportion of greenhouse gas emissions from their use. This is to be calculated based on the approved design and plans for the specific development, and secured through the installation and operation of low and zero carbon generating technologies.

8. One of the representations sought that 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, but did not indicate what proportion the policy should specify. The amended wording of the policy, as suggested above by the council, would satisfy the legal requirement and the terms of representations.

9. The council's amended wording specifies that the reduction in carbon dioxide emissions is to be 1%, rising to 2% from the beginning of 2022. I noted that the equivalent policy (Policy INF2) in the adopted local development plan contains similar wording, but specifies that the initial reduction in carbon dioxide emissions is to be 10%, rising to at least 15% by the end of 2016. I therefore asked the council to clarify this discrepancy.

10. In its response, the council confirmed that it now considered that this would best be resolved by reverting to the original wording of the current policy in the adopted local development plan, but with the required reductions updated to 15% initially, and to at least 20% by the end of 2022. This would be consistent with the reduction in emissions required by the current policy. I am therefore satisfied that this amendment is both required and appropriate.

Policy 7 'Waste Reduction and Management'

11. The scope to increase local availability of waste management facilities is an important element in improving the sustainability of the overall process by reducing the need to transport waste materials over long distances, normally by road. However Scotland's Zero Waste Plan also recognises the scope for collaboration between councils, and the provision of a facility that treats particular categories of waste from a wider area can be important in ensuring that some targets can be met.

12. I therefore conclude that criterion c), which provides support for new facilities which enable the management of waste closer to where it arises, is both appropriate and sufficient. However, I find that criterion b), which stipulates in addition that facilities should be primarily required to cater for waste arising in Inverclyde, is unnecessary and potentially counter-productive.

13. I agree that it would be appropriate for Policy 7 to require that, to be supported, proposals for waste management facilities should avoid significant adverse impacts, not only on historic buildings and places, but also on the wider natural environment. I therefore find that criterion e) should be extended accordingly.

Policy 8 ‘Managing flood risk’

14. I agree that it would be helpful, both for developers and for local communities, for this policy to specify clearly, at criterion a), what is regarded as a significant risk of flooding, as confirmed by the Scottish Environment Protection Agency in its representation.

15. The Scottish Environment Protection Agency has also advised for the first time that flood risk assessments would be required for three sites in order to enable the developable area to be identified. The sites are Slaemuir, Port Glasgow (R1); Selkirk Road, Port Glasgow (R8); and Ashburn Gate, Gourrock (R54). The council has confirmed that it will include this information within the action programme. I am therefore satisfied that no amendments to the plan itself are required.

Policy 9 ‘Surface and Waste Water Drainage’

16. I agree that it would be appropriate for Policy 9 to clarify that the requirement, for new build developments to demonstrate that surface water will be drained by a sustainable drainage system, is to apply during the construction phase, as well after completion.

17. I consider that the plan already sets out sufficiently, in the section relating to trees, woodland and forestry, the beneficial effects that woodland cover can have in relation to reducing flood risk. Paragraph 11.12 refers to its positive role in both sustainable water management and climate change mitigation. In addition, Policy 9 specifically stipulates that proposals for new build developments which need surface water drainage will be required to comply with the manual for sustainable drainage systems. This confirms the value and potential of trees and woodlands in mitigating flooding. Accordingly, I conclude that further references within the plan are not required.

Adaptation strategies

18. I have noted above that the plan refers (at paragraph 11.12) to the role of trees and woodlands in climate change mitigation and adaptation. Targets for tree planting will be matters to be addressed in the forestry strategy for the whole of the Clydeplan area, which is to be prepared in association with the strategic development plan and is already referred to in Policy 34 of this plan.

19. Read as a whole, I consider that the policy framework set out in this plan does present a consistent strategy to enable Inverclyde to help areas of new development and the wider community to adapt to some of the implications of climate change. In the absence of detailed and justified explanations as to why and how Policies 12, 14, 33, 34 and 36 should be modified, I find that no further amendments to these policies would be justified, beyond those I have recommended at Issue 13.

Reporter’s recommendations:

1. Modify the final bullet point of paragraph 4.2 by replacing “94%” with “70%”.

2. Modify the first sentence of paragraph 4.6 by replacing “.. sets out..” with “..will set out...”.

3. Modify Policy 6 by replacing it with:

“Support will be given to all new buildings designed to ensure that at least 15% of the carbon dioxide emissions reduction standard set by Scottish Building Standards is met through the installation and operation of low and zero carbon generating technologies. This percentage will increase to at least 20% by the end of 2022.

Other solutions will be considered where:

- (a) it can be demonstrated that there are significant technical constraints to using on-site low and zero-carbon generating technologies; and
- (b) there is likely to be an adverse impact on the historic environment.

Note: This requirement will not apply to those exceptions set out in Standard 6.1 of the 2017 Domestic and Non-Domestic technical handbook associated with the Building (Scotland) Regulations 2004, or to equivalent exceptions set out in later versions of the handbook.”

4. Modify Policy 7 by deleting criterion b), and re-numbering the subsequent criteria accordingly.

5. Modify Policy 7 by adding at the end of criterion e): “... and our natural and open spaces.”

6. Modify Policy 8 ‘Managing Flood Risk’ by adding at the end of criterion a): “...(i.e. within the 1 in 200 year design envelope)”.

7. Modify the first sentence of Policy 9 by inserting the words “....., during construction and once completed, ...” after “will be achieved”.

Issue 3	Connecting People and Places	
Development plan reference:	Section 5.0, Pages 14-15	Reporter: David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>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)</p>		
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):		
<p><u>SEPA (93)</u></p> <ul style="list-style-type: none"> • Support inclusion of Policy 10 • Support inclusion of Policy 12 and commend the Council for this approach. • Welcome the inclusion of a requirement for site communications to avoid adverse impact on the green network, as per Policy 13 <p><u>Mr and Mrs Hargreaves (100)</u></p> <ul style="list-style-type: none"> • 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. <p><u>Stuart McMillan MSP (286)</u></p> <ul style="list-style-type: none"> • 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. 		

Network Rail (288)

- 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 Dougliehill 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 (see maps within representation) 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.....”
- 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 Gourrock, 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.

- 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.”
- 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.
- The shared use path between Gourrock Train station and Albert Road was part of a planning permission for public realm and traffic improvement works at Gourrock Pierhead, 12/0212/IC (Document CD048). 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 Gourrock is a matter for the Local Transport Strategy process, which the LDP reflects.
- 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. 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”.
- 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.
- 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.

- 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.
- 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.
- 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 has 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. 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.”
- Under Regulation 18 of Circular 4 2009: Development Management Procedures, (Document CD050), the Planning Authority is required to notify Network Rail of any development proposals within 20m of the operational railway line. 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 Local Transport Strategy (2011-2016) (Document CD051). 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 Local Transport Strategy (2011-2016) (Document CD051). 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:

Preliminary matters

1. My examination of the plan is limited by regulations to addressing only the unresolved issues which have been raised in representations. The council has listed above a number of matters raised in representations which are in support of the provisions of the plan, or which simply make comments and do not seek modifications to the plan. Therefore, unless these relate to an issue which is unresolved, they will not be addressed in my conclusions.

Policy 10 ‘Promoting sustainable and active travel’

2. While the desire to secure improvements to transport facilities and services through contributions from developers is understandable, the legal basis for doing so is restricted. Policy 10 can secure from developers those improvements which would not be necessary without the development taking place. It would not be appropriate to go further, and I also accept that the imposition of additional burdens could discourage development and thus serve to help thwart the council’s aim for Inverclyde of re-population.

3. I agree that the requirement, set out in Policy 10, for developers to make their sites accessible for walking and cycling is not fully reflected in the wording of the supporting text in paragraph 5.5. I therefore conclude that the second sentence of that paragraph should be altered accordingly.

4. Where links to the active travel network are possible, this will allow those using new developments to connect to local facilities on foot or cycle. However I accept that not all development proposals will necessarily be in close proximity to the active travel network, and the amended wording should reflect that.

5. I note that it is established practice for the council to engage in early dialogue with Strathclyde Partnership for Transport when a requirement for public transport provision is identified in a transport assessment. Requiring dialogue is not in itself a land use policy, and I consider that it would neither be necessary nor appropriate to modify the policy to incorporate that.

6. I accept that a dedicated cycle route through Gourock would address some of the reported flaws relating to the recently provided shared use path between Gourock train station and Albert Road. However the requirement for it has not yet been assessed and confirmed through the local transport strategy process, and I therefore consider that it would not be appropriate to amend the plan to include it at this stage.

7. I am satisfied that the concerns expressed relating to paragraph 5.6, regarding the need to deal also with the impact of development proposals on the strategic road network, are already addressed sufficiently in paragraph 5.7.

8. I consider that Policy 10 is broadly consistent with the travel hierarchy of first walking, then cycling, then public transport, and lastly car. However this could be better reflected in the supporting text in paragraph 5.5. I find that it would be appropriate to secure this by amending the terms of the first sentence, as suggested by the council.

Additional car parking provision in Kilmacolm

9. At paragraph 5.6 the plan confirms that suggestions for additional car parking at Kilmacolm village centre were put forward earlier. Proposals for additional car parks sit uncomfortably under the plan's sub-heading of 'Promoting sustainable and active travel'. However I recognise that by facilitating use of the businesses and services in Kilmacolm, this may reduce the likelihood of local residents making longer distance car trips to other towns.

10. The council has indicated that the requirement for such proposals has to be evidence based, and taken forward through the local transport strategy. It advises that there is no proposal for a new car park in Kilmacolm in the present local transport strategy. However I note that Policy 10 confirms that the council would support the implementation of transport schemes which are set out in council-approved strategies. As there has not yet been a detailed appraisal of such a proposal, it appears to me that this policy provides the means by which a future proposal can be supported.

11. I therefore conclude that the plan does not require to be amended in relation to this matter.

A8 Relief Road

12. At paragraph 5.6 the plan confirms that one of the issues raised at the main issues report stage was a need for an alternative route through Inverclyde when there is reduced capacity on the A8 trunk road. The resilience of strategic transport routes is of particular importance to Inverclyde due to its geographical position on the Clyde, which restricts alternative means of access by road or rail. However the assessment of both the need for, and the cost and other implications of, such a scheme has not yet been undertaken and it is not part of the local transport strategy. That would be a separate matter for the council and Transport Scotland to progress. In these circumstances I consider that it would not be appropriate to include such a proposal in the local development plan at this stage.

Policy 11 'Managing the impact of development on the transport network'

13. I agree that it would be appropriate to amend the wording of Policy 11 so as to confirm that it is intended to apply to the whole transport network, and not just to roads,

but that the second sentence of paragraph 5.7 of the supporting text applies only to the strategic road network. It is also appropriate that this paragraph should also confirm that transport assessments may also be required in relation to developments which may affect the rail network. Paragraph 5.8 should also be amended to clarify that it relates only to the road network, and not to the wider transport network.

14. I do not consider it appropriate or necessary to incorporate within the policy an obligation on the council to consult Network Rail on planning applications that might affect the operational rail network, as this is already specified in regulations.

15. I consider that it is likely that the considerable loss of industry, employment and population from Inverclyde over the last 40 years will have had the effect of reducing demand for public transport services. I have not been given evidence to demonstrate that there are significant capacity constraints. I find that the approach adopted by the council is appropriate in highlighting that it will seek developer contributions to enhance public transport facilities where this need arises from a particular development that is being proposed. To go further could risk legal challenge.

Policy 12 'Air quality'

16. I consider that the positive role of trees is already recognised in section 11 of the local development plan, which highlights their contribution to climate change mitigation and to making parks and countryside more attractive to visit, and the positive role of green infrastructure in cleansing the air and promoting better health and well-being.

17. In these circumstances I consider that it is neither necessary nor appropriate to make additional, specific reference to their potential contribution within the terms of Policies 10 and 12.

18. Policy 12 sets out the circumstances where development proposals will be required to be accompanied by an air quality assessment, and I consider that it is not appropriate to incorporate native woodland targets for the whole of Inverclyde within its terms. I also agree that it is not the role of the local development plan to set out the range of potential mitigation measures which could be recommended by those undertaking such assessments, although I do accept that tree planting could be one of those potential measures. However the council has confirmed that Inverclyde does not at present have an air pollution reduction strategy. I consider that it would be appropriate to amend the supporting text at paragraph 5.9 to confirm this position.

Policy 13 'Communications Infrastructure'

19. I agree that it would be appropriate to clarify the wording of Policy 13 to confirm that the siting of digital communications infrastructure should avoid adverse impacts on the landscape. As suggested by the council, this can be secured by replacing the reference to the green network, with reference instead to the wider natural environment. This can be encompassed by the term 'our natural and open spaces', which is used elsewhere in the plan.

20. As amended, I am satisfied that the wording would be both appropriate and sufficiently robust, and it is not necessary to reflect the wording of the policy (Policy INF6) of the current local development plan. The design of a proposal can enable adverse impacts to be avoided. I also consider that the inclusion of a requirement for there to be

no suitable alternatives is not generally appropriate.

Reporter's recommendations:

1. Modify the first sentence of paragraph 5.5 by replacing it with: "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"
2. Modify the second sentence of paragraph 5.5 by replacing it with: "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."
3. Modify the first sentence of paragraph 5.7 by replacing it with: "Development proposals should not have an adverse impact on the efficient operation of the transport and active travel network."
4. Modify the second sentence of paragraph 5.7 by inserting: "...road..." between "strategic" and "network".
5. Modify the final sentence of paragraph 5.7 by inserting: "..., including for the rail network, ..." between "required" and "as a result of".
6. Modify the first sentence of paragraph 5.8 replacing: "transport" with "road".
7. Modify the first sentence of Policy 11 by inserting: "...and active travel..." between "strategic" and "network".
8. Modify the first sentence of paragraph 5.9 by adding: "... or an air pollution reduction strategy."
9. Modify Policy 13 by replacing: "the green network" with "our natural and open spaces".

Issue 4	Our Towns, Villages and Countryside	
Development plan reference:	Section 6.0, Pages 18-20	Reporter: David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Julie McGowan (6) Wilma Currie (7) Juliet Loudon (8) Alan Halliday (10) Karina Young (54) Angus MacDonald (81) Homes for Scotland (89) SEPA (93) 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) Rona McGinn (328) Steven Morecroft (348) 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)</p>	<p>Helen McCall (388) Maira Grant (392) Gladman Scotland (394) Mr & Mrs Paul Deakin (399) Janet Stewart (410) Tom Fyfe (418) Peter Wylie (419) Shona Donnachie (437) Linda Taylor (440) Kilmacolm Community Council (443) Helen Mathie (447) Beth Madeley (448) Gavin Madeley (450) Roderick Blackwood (452) Frank Gillone (454) Woodland Trust Scotland (460) Quarriers (461) Anthony Murray (468) Antony Vitrano (469) David Walker (473) Christina Forbes (475) Kilmacolm Civic Trust (479) Scottish Natural Heritage (484) Barry Swan (486) Elizabeth Forbes (489) David Doherty (490) West College Scotland (494) Rosemary Hammond (499) Colin Hancock (553) Ian MacConnacher (558) Councillor David Wilson (560) David Madden (571)</p>	
Provision of the development plan to which the issue relates:	Green Belt and Countryside (Policy 14), Soils (Policy 15) and Contaminated Land (Policy 16)	
Planning authority's summary of the representation(s):		
<p><u>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</u></p>		

Davidson (326), Ralph Leishman (327), Rona 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), Mr & Mrs Deakin (399), Janet Stewart (410), Tom Fyfe (418), Peter Wylie (419) Shona Donnachie (437), Linda Taylor (440), Helen Mathie (447), Beth Madeley (448), Gavin Madeley (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.

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.

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 (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 (Document CD035), 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 (Document CD037) 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 (Document CD030). 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 (Document CD012) 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 Document CD030).
- 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 (Document CD034), and thereafter the 2005 Local Plan (Document CD032), and the 2014 Local Development Plan (Document CD030). (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 (Document CD012). 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 (Document CD034), 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 inquiry report into objections to the 2002 Inverclyde Local Plan Final Draft (Document CD033), 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 Examination Report into the 2013 Proposed Inverclyde Local Development Plan (Document CD031), 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 (Document CD030). 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 (Document CD030), 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:

Preliminary matters

1. My examination of the plan is limited by regulations to addressing only the unresolved issues which have been raised in representations. The council has listed above a number of matters raised in representations which are in support of the provisions of the plan, or which simply make comments and do not seek modifications to the plan. Therefore, unless these relate to an issue which is unresolved, they will not be addressed in my conclusions.
2. The representation seeking a woodland and forestry strategy is addressed separately at Issue 13.

The introduction

3. I agree that it would be appropriate to amend the description of Greenock to include reference to the role of the Greenock campus of West College Scotland within the town centre.

Policy 14 'Green belt and countryside'

4. Most of the representations referred to here confirm their support for the designation of a green belt around both Kilmacolm and Quarriers Village, and also for the policy which controls development within the green belt. Neither of these are matters of principle that are in dispute or unresolved.
5. Other representations made to the plan argue that some of the land which is currently designated as green belt around both Kilmacolm and Quarriers Village, should instead be allocated for housing development. That matter is dealt with separately at Issue 5.
6. In preparing this plan, the council has not conducted a formal, comprehensive review of the green belt in Inverclyde. I note that they are not required to do so by the Clydeplan strategic development plan. However the first issue identified for comment in the main issues report was whether the current sustainable development strategy in the adopted plan remains valid. The report confirmed that this included policies stating a preference for all new development to be on brownfield sites within urban settlements, and setting a presumption against the spread of the built up area into the green belt.
7. I am therefore satisfied that the continued relevance of the current approach to green belts was reviewed during the preparation of this plan. In addition, the opportunity has

been given for interested parties to seek to alter the extent of the green belt, as shown on the proposals map, and the terms of the policy itself. Indeed, that opportunity has clearly been taken up in a number of representations, and these will be dealt with through this examination.

8. I consider that it is clear from Policy 14 of Clydeplan that each of its planning authorities is to designate a green belt within their own area, and that the inner and outer boundaries of the green belt should ensure that the eight objectives which it identifies can be met. This does not automatically require the inner boundaries of the green belt to abut the existing edge of the built up area of towns and villages. Other needs, including for housing and economic development, have to be taken into account. Councils also have to weigh green belt objectives with their other objectives, such as the priority which Inverclyde attaches to re-population. A 'blanket approach' to the designation of green belts is there inappropriate, and the council confirms that it has not adopted such an approach.

9. Suggested amendments therefore need to be assessed on their merits, in the light of the objectives of the plan. The arguments in favour of removing land from the green belt in the Renfrewshire housing sub-market area (around Kilmacolm and Quarriers Village), and allocating it instead for housing development, are examined at Issues 5 and 8. Other sites currently within the green belt elsewhere in Inverclyde that are highlighted in representations are dealt with either below, or at Issues 6 and 7. However, in relation to the general approach taken in the plan to the designation of green belt, I find that no amendments are required.

Policy 15 'Soils'

10. The likely impact on soils is one of the assessment criteria that has been used to select the sites which have been allocated for development in this plan. This policy, while supporting the development of allocated sites, is also intended to provide a basis for considering development proposals that may come forward on other sites. I consider that it will provide good protection both by directing development away from either prime agricultural land or from land which comprises carbon rich soils, and by minimising the impact on the soil resource in the event that planning permission is granted.

11. I also consider that, as currently worded, this policy is consistent with the requirement set out in Scottish Planning Policy that, where peat and other carbon rich soils are present, applicants should assess the likely effects of development on carbon dioxide emissions and minimise this release.

12. I find that the policy, as currently worded, will be effective in ensuring that the importance of protecting carbon rich soils is properly taken into account by the planning authority in weighing the merits of specific proposals. It has not been explained how the objective of restoring peatlands could be secured through this policy, and I consider that this would need to be pursued separately. I therefore conclude that no amendment to this policy is required.

Policy 16 'Contaminated land'

13. Where the development potential of sites containing contaminated land is being considered, I agree that it would be helpful for the plan to indicate that there is helpful guidance on site investigations and remediation measures contained in the Scottish

Government's Planning Advice Note 33 'Development of contaminated land' which should assist both potential applicants and the planning authority. I therefore find that it would be appropriate for the supporting text to this policy to contain a reference to it.

Specific sites

14. The site at Strone Farm, Greenock is within the green belt and comprises a small area of apparently unmanaged countryside which is separated from the existing built up area of Greenock at Aberfoyle Road by the Auchmountain Glen local nature conservation site. It is also separated from existing houses on Whinhill Crescent by rising, open, undeveloped land immediately to the north. That land was previously allocated for housing development, but remained non-effective and is now to be included within the green belt.

15. I have been provided with no evidence that this site could prove effective for housing development, and it is evident from its rising topography that it plays an important role in creating visual and landscape containment for the town. This is consistent with protecting the landscape setting of settlements, which is one of the objectives of the green belt. I therefore do not agree that extending the urban area over this site could be achieved without significant impact on the green belt.

16. I also note that, unlike those housing sites allocated in the plan, this site was not suggested to the council as a potential development site during its preparation. It has therefore not been subject to the strategic environmental assessment process, nor has it been the subject of public consultation. In all these circumstances I conclude that an amendment to the plan to remove this site from the green belt and to include it instead within the residential area would not be appropriate.

17. With the exception of the area of allotments, the upper area of Quarriers Village is designated in the plan as a 'residential area'. As such, the plan confirms (at paragraph 7.8) that:

"New houses will also be supported in existing residential areas where the impact on existing houses is acceptable, and the design and layout of the new houses are in keeping with their surroundings. Likewise, appropriate non-residential development can also enhance residential areas as a place to live, but needs to be considerably located, designed and operated to avoid unacceptable impact on nearby houses."

18. I consider therefore that this provides an appropriate framework within which to assess any future proposals that Quarriers are likely to bring forward.

19. The area of allotments extends beyond the built up area. Arguably, its use is an integral part of the village, but the nature of its use is also compatible with its designation as part of the green belt. As I do not find this to be inappropriate, I conclude that an amendment to the plan is not required.

20. Previous plan examinations have considered representations seeking the allocation for housing development of the land comprising 'The Plots', which are on the west side of Port Glasgow Road, Kilmacolm. No change in circumstances has been brought to my attention which would lead me to depart from the recommendations of previous reporters. The site contributes positively to the landscape setting of Kilmacolm and I am therefore satisfied that its inclusion within the designated green belt remains appropriate.

21. The council has confirmed that two areas of land at Kilmacolm have been the subject of errors on the proposals map.

22. The first is an area of land that lies between Gibson Lane and Smithy Brae (adjacent to Rosebank Terrace), Kilmacolm. It has been shown in error on the proposals map as green belt. In the adopted local development plan, this land is shown within the village boundary, as lying within the residential area. The council has advised that this designation should be retained. I therefore find that the proposals map for this plan should be amended to rectify this error.

23. The second is another area of land, comprising a former quarry site, on Port Glasgow Road, Kilmacolm. This has been shown in the proposals map as green belt, despite being identified on the proposals map of the adopted local development plan as lying within the residential area of Kilmacolm, and being identified as a residential opportunity (r63). The council has confirmed that this site should also be shown as lying within Kilmacolm's residential area, rather than within the green belt.

24. The council has also advised that the site should not now be identified as a 'housing development opportunity site'. This is because, while the site's capacity has now been confirmed as being for three houses, the plan now only identifies sites with a capacity for four or more houses as 'housing development opportunity sites'. I note that this mirrors the approach adopted by the council in its latest housing land audit.

25. I therefore conclude that it is appropriate to amend the proposals map as it relates to site r63 at Port Glasgow Road, Kilmacolm, as shown on the proposals map of the adopted 2014 local development plan. On the proposals map for this plan, the green belt designation should be removed from this land, and it should be included instead within the residential area of Kilmacolm. This also reflects the fact that the approved development has already begun, as was evident on my site inspection.

Reporter's recommendations:

1. Modify the second sentence of paragraph 6.2, by inserting: "along with West College Scotland's Greenock campus" after "town centre".
2. Modify paragraph 6.13 by adding at the end: "Guidance on site investigations and remediation measures is contained in the Scottish Government's Planning Advice Note 33 'Development of contaminated land'."
3. Modify the proposals map to remove from the green belt the area of land between Gibson Lane and Smithy Brae (adjacent to Rosebank Terrace), Kilmacolm (as shown in representation 558), and instead include it within the residential area of Kilmacolm.
4. Modify the proposals map as it relates to site r63 at Port Glasgow Road, Kilmacolm, as shown of the proposals map of the adopted 2014 local development plan, by removing it from the land designated as green belt, and including it within the residential area of Kilmacolm.

Issue 5	Housing Land Supply, Housing Supply Targets and Housing Land Requirement	
Development plan reference:	Section 7.0, Pages 21-27	Reporter: David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Homes for Scotland (89) SEPA (93) Gerard Hampsey (120) Inverclyde Housing Partnership Group (294) Peel Land and Property (343) Gladman Developments Ltd (394) Mactaggart & Mickel Homes Ltd (398) Taylor Wimpey (West Scotland) Ltd (401) Scottish Government (411) DM Land (415) Quarriers/Gladman Developments Ltd (457) John Watson (467) Sanmina SCI (472) Scottish Natural Heritage (484) Strathclyde Partnership for Transport (556) Councillor David Wilson (560)</p>		
Provision of the development plan to which the issue relates:	Our Homes and Communities	
Planning authority's summary of the representation(s):		
<p><u>Homes for Scotland (89)</u></p> <p>(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.)</p> <ul style="list-style-type: none"> • 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. • 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. • 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 measures 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 (Document CD013) 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 (Document CD040) 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 (Document CD035) 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 (Document CD037) 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 (Document CD0.13), 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 (Document CD013). 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 (89, 394, 398, 401, 411, 415, 457, 467)

- 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 HNDAs 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 (Document CD013). 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 (Document CD028), 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 (see table below). 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.

	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
Inverclyde affordable HST	90	90	90	90	90	90
Inverclyde affordable completions	112	59	1	106	0	68
Inverclyde HMA private HST	160	160	160	160	160	160
Inverclyde HMA private completions	89	75	111	138	87	35
Renfrewshire SHMA private HST	10	10	10	10	10	10
Renfrewshire SHMA private completions	2	1	0	0	0	0

*HST figure based on 1/12th of 2012-2024 figure and rounded to nearest 10

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

- Paragraph 119 of Scottish Planning Policy (Document CD035) 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 (Document CD041) 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 (Document CD042), 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 (Document CD028), which the Plan is based on.
- This calculation is effectively the ‘annualised approach’ and is set out in the Housing Land Technical Report (Document CD013) 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 (Document CD032), then as a major Area of Change in the 2014 Local Development Plan (Document CD030), 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 237 metre 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 (Document CD046) was submitted in 2009 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. In relation to this a fresh Proposals of Application Notice has been submitted in respect of the site (Document CD054). 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) (Documents CD064 & CD065) 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 (r47) – a planning application for 198 houses was submitted by Link Housing in July 2018 (18/0205/IC) (Document CD067). 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 (r65) – 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 the Clydeplan Housing Market Area Framework (Document CD039).
- 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 (Document CD013) 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 (89, 394, 398, 401, 415, 457)

- There is undoubtedly uncertainty as to whether additional housing land is required in the Renfrewshire Sub Housing Market Area. The Housing Land Technical Report (Document CD013) 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 (Document CD037) 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 draft Action Programme (Document CD004) 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:

Preliminary matters

1. My examination of the plan is limited by regulations to addressing only the unresolved issues which have been raised in representations. The council has listed above a number of matters raised in representations which are in support of the provisions of the plan, or which simply make comments and do not seek modifications to the plan. Therefore, unless these relate to an issue which is unresolved, they will not be addressed in my conclusions.
2. Similarly, representations made in relation to the contents of the action programme are not a matter that can be dealt with by this examination.
3. It should also be noted that the sub-headings that I use in reaching my conclusions do not wholly correspond with those used by the council above in its response to the representations.

Affordable housing policy and distribution

4. This local development plan is required to be consistent with the Clydeplan strategic development plan which was approved by the Scottish Ministers in July 2017. That plan

set out the housing supply target and housing land requirement for new affordable housing across Inverclyde for the period from 2012 to 2029. Despite the housing need and demand assessment projecting that, over this period, there will be over 400 fewer households in Inverclyde who will be in need of houses in the affordable sector, the strategic development plan set a housing supply target of 1,500 affordable houses to be built during the period.

5. In its housing technical paper the council explains that this decision reflected both the re-population agenda it is pursuing, together with the anticipated level of funding from the Scottish Government specifically for new social rented housing projects in Inverclyde. The council has also confirmed that it expects that the demolition of poor quality existing houses in this sector will continue during the plan period.

6. I note that the strategic development plan has applied a 'generosity factor' of 15% to this housing supply target, resulting in it specifying a housing land requirement for the affordable (or social) sector of land for 1,730 houses across Inverclyde.

7. I consider that the scale of investment in new affordable housing which is envisaged in this local development plan can make an important contribution to the priority outcome identified by the council of 're-population', particularly when applied in conjunction with the plan's policy (Policy 1) for creating successful places. It also provides the opportunity to upgrade the overall quality of the stock of affordable houses. This can help to retain existing households, as well as to attract new ones to live in Inverclyde.

8. The anticipated investment provided by the Scottish Government and other sources provides confidence that delivery of new affordable houses will not depend on attracting house-builders to develop sites for new private sector homes, and then imposing a requirement that 25% of the houses should be in the affordable sector. The recent low level of activity in Inverclyde by private sector house-builders may reflect recent market conditions, to which population decline will have contributed. However the removal of the 25% requirement has been welcomed by some who made representations, and who indicated that this will improve the viability of developing some of the private sites. If so, securing the delivery of new housing on those would also contribute to re-population.

9. No evidence has been submitted to suggest that the policy requirement for a 25% contribution to affordable housing on greenfield sites would be a significant barrier to the delivery of private housing sites in the Inverclyde villages (Kilmacolm, Quarriers, Inverkip and Wemyss Bay). I note that no sites in these villages are proposed specifically for affordable housing there, or are identified in the council's strategic housing investment plan for the next five years. The retention of the policy requirement for the 25% contribution to affordable housing on greenfield sites in these villages would ensure, in the event that planning permission for housing development on such sites is granted, that some additional affordable housing can be secured as part of those developments.

10. Affordable housing is not restricted only to 'social rent' houses, and may include some forms of home ownership. However the council has confirmed that there is a need for more houses for social rent in the Inverclyde villages. I note, from paragraph 1.3, that the council intends to produce supplementary guidance to assist potential developers with additional detail and guidance on this subject, as it relates to greenfield sites in the Inverclyde villages. I consider that Policy 17 should be amended to reflect and confirm this intention. However I also consider that this guidance should not be wholly restricted to social rent provision. There may be circumstances, for instance on small sites, where

this may not be practical, and other forms of affordable housing provision may also contribute to meeting the needs of local households.

11. It is therefore also appropriate to amend the reference in criterion d) of this policy to refer to the requirement for 25% of houses on new greenfield release sites in the Inverclyde villages as being for affordable housing, rather than being restricted solely to 'social rent'. As this is repeated in Policy 18, a similar amendment is required there.

12. The possibility that the need for additional affordable housing could be met by allocating sites in these villages solely for that purpose is not a matter which is before me in this examination, as it has not been proposed by the council and has not been raised in representations that have been submitted in relation to any specific sites. However a number of housing developers have confirmed that 25% or, in one case, 30% of the houses which they would build on sites which are not included in the proposed plan, and which they seek to be allocated as housing development opportunity sites, would be affordable houses.

13. Where a shortfall in the provision of affordable housing in any village is confirmed, that would be a material consideration which would weigh in favour of granting planning permission or allocating sites for housing development there, although it may not be an over-riding consideration.

Demographics

14. Like Scotland, Inverclyde is experiencing an ageing population. Here this may be exacerbated by recent population decline through net movement away. This will have reduced demand and the pressure on the existing stock, which may have increased the flexibility in meeting the changing needs of households. These are factors that both private developers and registered social landlords are likely to consider, as they adapt and respond to changing needs and demands. Scottish Planning Policy does not indicate that implications of an ageing population is a matter which requires to be addressed explicitly in local development plans. I consider that this may be addressed more appropriately in the council's local housing strategy and its strategic housing investment plan.

Housing market areas, housing supply targets and housing land requirements

15. In this local development plan, the approach taken to the role of housing market areas generally follows that of the strategic development plan. It is required to be consistent in this respect. Therefore I find that it is entirely appropriate for the whole of Inverclyde to be the area used for assessing housing needs in the affordable sector, and for then identifying the housing supply target and the housing land requirement for that sector.

16. For the private sector, the strategic development plan identifies almost the whole of Inverclyde as a separate housing market area, and sets out both a housing supply target and a housing land requirement for this housing market area.

17. However, a small area in the south-east of Inverclyde, around and including both Kilmacolm and Quarriers Village, forms part of the Renfrewshire housing sub-market area, which in turn forms part of the Central Conurbation housing market area. The rest of the Renfrewshire housing sub-market area, outwith Inverclyde, consists of the entire

council area of Renfrewshire and part of East Renfrewshire. The strategic development plan explicitly sets out both a housing supply target and a housing land requirement for the Renfrewshire housing sub-market area.

18. This approach is reflected in the local development plan to the extent that schedule 4, which lists housing development opportunity sites, separately identifies those in Kilmacolm and Quarriers Village as being within the Renfrewshire housing sub-market area. For every site that is allocated in the local development plan, the tenure of the proposed houses is also identified indicatively. All of those within the Renfrewshire housing sub-market area are confirmed as being in the private sector. Elsewhere in Inverclyde, the sites' tenure is identified as being private, affordable or mixed.

19. I find that this is broadly consistent with the approach to housing market areas set out in the strategic development plan. However, designating the housing capacity of some sites as being 'mixed tenure' prevents the local development plan from demonstrating that the separate housing supply targets and housing land requirements, which are set out in the strategic development plan, will be delivered, either for the affordable sector across the whole of Inverclyde, or for the private sector across the Inverclyde housing market area.

20. The council has confirmed that previous experience in Inverclyde is that sites, or parts of sites, which are originally identified as being for private sector housing development, are often purchased by registered social landlords and then developed for affordable housing.

21. In these circumstances, I find that it is not inappropriate for the local development plan to identify some sites as mixed tenure. While this prevents it demonstrating full compliance with the strategic development plan for each tenure, it still enables it to demonstrate whether the more important 'all tenure' housing land requirements of the strategic development plan are being met.

22. For Inverclyde's part of the Renfrewshire housing sub-market area, it has emerged through this examination that the strategic development plan's requirements for land for private sector housing development can be interpreted in two contradictory ways. The council interpreted it in one way in preparing the local development plan, and in the other way in its response both to the representations above, and in response to a request from me for clarification.

23. At page 38 of the main issues report of March 2017 for this local development plan, the council stated that: "The Housing Need and Demand Assessment undertaken for the Clydeplan Strategic Development Plan identifies a Housing Land Requirement in the Kilmacolm/Quarriers Village area for 130 new houses in the period 2012-2024. There were 3 housing completions in the period 2012-2016 (on sites with a capacity for 4 or more houses), leaving a requirement for 127 houses in the period to 2024. The council's 2016 Housing Land Audit predicts 75 houses will be delivered on land already identified for housing in the period to 2024. This indicates a potential shortfall of housing land for 52 houses."

24. Clydeplan was approved subsequently, in July 2017, with small increases to the housing land requirement, both for the period 2102 to 2014, and for the period 2024 to 2029. In its 'Housing land technical report' (core document CD13) prepared in support of the local development plan, the council showed at Table 5 (see extract below) that the

private housing land requirement for the Inverclyde part of the Renfrewshire housing sub-market area can be derived by comparing Schedules 8 and 9 of Clydeplan.

Table 5: Private Housing Land Requirement by Housing Market Area

	2012-2024	2024-2029	2012-2029
Inverclyde Local Authority Area* (a)	2,360	980	3,340
Inverclyde discrete Housing Market Area** (b)	2,220	920	3,140
Renfrewshire Sub-Housing Market Area (Inverclyde part) ((a)-(b))	140	60	200

* Source: Schedule 8 Clydeplan Strategic Development Plan 2017

** Source: Schedule 9 Clydeplan Strategic Development Plan 2017

25. In table 6 of the technical report, the council confirmed that between 2012 (the base date) and 2017, there had only been 3 private sector houses completed in the Renfrewshire housing sub-market area. With an existing housing land supply with a capacity of 113 houses (shown in Appendix 1), the council confirmed that the plan does not identify sufficient housing land, at least for the period 2024-2029, and, depending on the method of calculation, also for the period 2012 to 2024.

26. A number of representations also argue that the local development plan would be inconsistent with Clydeplan if additional land is not allocated within the Renfrewshire housing sub-market area to satisfy the housing land requirement, as calculated by the council in its technical report.

27. However in its response to these representations, as set out above in this schedule 4, the council now argues that the calculation it set out in its technical report to identify the requirement for the Inverclyde part of the Renfrewshire housing sub-market area is not a requirement that is endorsed by Clydeplan. It further contends that, in fact, the housing market area approach suggests that this requirement can be met anywhere in the Renfrewshire housing sub-market area, rather than focused on such a small geographic area.

28. The council also advises that it had explored this with Renfrewshire and East Renfrewshire Councils, but their local development plans were not then at a stage where acceptable opportunities to achieve this could be identified.

29. This changed position was re-iterated by both the council and the Clydeplan strategic development plan authority in their responses to my request for clarification. They re-iterated the contention that the strategic development plan assigns the key role in delivering housing supply targets to its identified housing market areas, rather than to the council areas for which each local development plan is prepared.

30. Other documents submitted by another party in response to this request from me showed that detailed work relating to this had been undertaken in preparing the strategic development plan. This had led, eventually, to a specific private sector housing land requirement for the Inverclyde part of the Renfrewshire housing sub-market area being identifiable by a comparison between Schedules 8 and 9 of the strategic development plan.

31. On the basis of all of this information, I find it very persuasive that, to be consistent with the strategic development plan, this local development plan is required to allocate sufficient land with a total capacity of 200 private sector houses, capable of being completed by 2029, in the Inverclyde part of the Renfrewshire housing sub-market area (that is, in Kilmacolm and Quarriers Village).

32. However, the strategic development plan contains additional, and seemingly contradictory, provisions. In schedule 9, it also confirms that for the whole of the Renfrewshire housing sub-market area, there is already an indicative surplus in the housing land supply for the private sector. There is surplus capacity for some 1,650 houses in excess of the housing land requirement of 10,190 houses for the whole of the plan period from 2012 to 2029.

33. If the local development plans for both Renfrewshire and East Renfrewshire were already adopted, or even finalised, it would now be possible to ascertain whether this indicative surplus had been confirmed, or whether the release of additional sites in Inverclyde's very small part of the housing sub-market area is indeed still required. However, these plans have not reached that stage.

34. On that basis, I find that it would also be reasonable to reach the contrary conclusion that this local development plan is not required to allocate any further sites in order to secure a total capacity of 200 houses for private sector housing development in Kilmacolm and Quarriers Village, in order to be consistent with the strategic development plan.

35. I also note that the sites in Kilmacolm and Quarriers Village which have been proposed for allocation in representations, and are therefore before me in this examination, are all greenfield sites. Elsewhere in the Renfrewshire housing sub-market area there may be brownfield sites in more sustainable locations to which priority should be given in releasing additional land for housing development.

36. Schedule 8 of Clydeplan also sets out the all-tenure housing land requirement for the whole of the Inverclyde council area. For the whole plan period from 2012 to 2029, it confirms that land with capacity for 5,070 houses is required. This scale of site allocations is intended to ensure that the all-tenure housing supply target of 4,400 house completions across Inverclyde can be delivered over this period. If the local development plan allocates insufficient land to enable this to be achieved, then it may in that way be considered to be inconsistent with the strategic development plan.

37. In preparing this local development plan, I agree that it was appropriate to take account of the house completions which had already been secured between 2012 and 2017. These totalled 788 out of the 4,400 all-tenure housing supply target for the whole of Inverclyde. The 15% 'generosity' allowance does not now need to be applied to that element of the target in order to secure their delivery.

38. Therefore I consider that, to be consistent with the strategic development plan, this plan is now required to provide land for housing development that is sufficient to enable some 3,612 more houses to be completed between 2017 and 2029, which is the end of the plan period. By applying the 15% generosity allowance, that means that the updated housing land requirement is for sites with capacity for some 4,154 houses. The 69 sites allocated in this plan, as listed in schedules 3 and 4, have a total capacity for 6,104 houses. This total will be increased by a net figure of 75 houses if the modifications recommended at Issues 6 and 7 are made, which would involve deleting the site for 40

houses at Papermill Road, Greenock, and allocating the site for 115 houses at Arran Avenue, Port Glasgow.

39. Some have expressed serious doubts as to whether these sites can prove sufficiently effective in delivering the scale of house completions reflected in the housing supply target set by Clydeplan. The council itself is now emphasising the scale of its re-population ambition that is embodied in that target.

40. The role of the local development plan is not to demonstrate that a target will be met. Rather it is to provide enough land that is capable of becoming effective and is sufficient to enable the target to be met. Nor is it the role of the local development plan to modify the housing supply target. The number of completions that have been delivered between 2012 and 2017 (788 houses) may, or may not, indicate that the overall target of 4,400 new houses by 2029 will be wholly achieved.

41. I have also noted that the council's strategic housing investment plan for 2018/19 to 2022/23 contains a programme for the development of some 1,441 affordable houses across Inverclyde in this five year period. This would clearly secure a substantial increase in the rate of delivery. This largely reflects the major increase in funding made available by the Scottish Government for this period. Evidence has also been given that one of the main registered social landlords, operating only in Inverclyde, has now secured increased bank loan facilities to help fund its own programme of 1,000 new homes, with 750 of these to be built in the next three years.

42. The prospects for a similar significant increase in delivery by the private sector are not currently so encouraging. The council's 2017 housing land audit projects some 708 completions in the five years to 2022, but it also identifies land which is committed, consented, or otherwise has 'residential potential', with a total capacity for over 4,000 houses. The inclusion of sites with 'residential potential' may not now be relevant if they are not to be allocated in this plan, or have not otherwise received planning permission.

43. The limited interest, expressed in the form of representations in front of this examination, from house-builders in relation to land in Greenock, Port Glasgow and Gourock may be indicative of the difficulties which will be faced in securing greater contributions from the private sector to delivering the overall housing supply target and, thereby, to the council's re-population aims.

44. Concerns have also been raised about the reliance on some very large brownfield sites. However, as confirmed at Issues 6 and 7, these sites do appear suitable for housing development, at least in part. The plan also confirms that 'city deal' funding has been secured for the road improvements required for the re-development of the former Inverkip power station site, which is to include the provision of some 670 houses.

45. In addition, one national house-builder has confirmed its interest in participating in the re-development of the large site at Spango Valley, endorsing its identification as a 'priority place' and confirming that the increase in its stated housing capacity to 420 houses will make it more viable. A major development company has also confirmed its support for the identification of both 'The Harbours' and 'James Watt Docks' as 'priority places' for re-development, incorporating some 240 and 900 private sector houses respectively.

46. Taking account of all of these considerations, I find that the scale and nature of the

land being made available through this local development plan is sufficient to meet the council's ambitions, which are embodied in the all tenure housing supply target and the housing land requirement for the whole of Inverclyde that are set out in Clydeplan for the period 2012 to 2029, and reflect its aim to secure the 're-population' of Inverclyde. Any development during this period on 'windfall' sites and on sites for fewer than four houses, although unlikely here to be substantial, will further boost the scale and rate of delivery, as would development on the additional site at Arran Avenue, Port Glasgow which is recommended for allocation through this examination.

47. I recognise that changes in funding availability and market demand may result in differences between the timing and tenure of house completions, compared with that which is envisaged in Clydeplan. However, development plans have little influence over these factors, and this is reflected in recent experience here of sites being transferred between sectors. I am satisfied that this plan is generally consistent with the strategic development plan's requirements. It provides sufficient housing land to meet Inverclyde's all-tenure housing land requirement for 2012-2029 set out in Clydeplan; and that land is capable of being developed during the period to 2029, and is also sufficient to enable the all-tenure housing supply target for the whole of Inverclyde to be met by 2029, which is ten years from its likely date of adoption.

48. Accordingly, I also find that there is no overall deficiency in the provision of housing land in the proposed plan across the whole of Inverclyde which might, for that reason, separately justify releasing additional greenfield land at Kilmacolm or Quarriers Village for private sector house-building on sites that have not previously been allocated for development. (Note: See Issue 8 for detailed consideration of the merits of individual sites.)

49. While it is understandable that concerns are expressed about ensuring that development proceeds on the sites allocated in the plan, particularly on the 'priority places', that is the role of the action programme, rather than of the local development plan. I note that the council has confirmed that the version of the action programme which it will publish when this plan is adopted will be more focused on delivery.

Effective housing land

50. One representation states that the effectiveness of some sites requires to be reviewed or justified. The obligation on planning authorities, set out in Scottish Planning Policy, when allocating a site in the local development plan for housing development is that they should consider that the site either is effective, or is capable of becoming effective during the plan period. As set out in its 'Proposed development sites assessment' (submitted as core document CD12), the council carried out a detailed assessment, both of the sites which it included in the proposed plan and of the others which were suggested for inclusion. That assessment included consideration of whether the site would be effective. Issues relating to delivery of development on each site are to be taken forward in the action programme.

51. A number of significant sites have been questioned: the former Inverkip power station site; Spango Valley, Peat Road/Hole Farm, and Ravenscraig Hospital (all Greenock); and Smithy Brae, Kilmacolm. On the basis of the information provided by the council in relation to the first four of these, I accept that it is reasonable to regard each of these as capable of becoming effective. The detail programming of development on each site is not a matter for the local development plan, but will be monitored through the

annual housing land audit. The council has confirmed that it considers that the site at Smithy Brae, Kilmacolm, which was previously granted planning permission on appeal, is capable of becoming effective. This conclusion is supported by the general marketability of Kilmacolm as a location for new housing development, as evidenced by the representations received from those who have an interest in developing other sites in Kilmacolm for housing.

52. Based on the evidence before me, I do not consider that the allocation of any of these sites is inappropriate. Accordingly I conclude that this would not justify amending the plan to omit them.

53. It is clear that there are disputes as to the most appropriate methodology to use in calculating for any area whether a five years' effective housing land supply has been met. In 2016 the Scottish Government published draft advice to assist in the preparation of development plans. It set out, among other things, a methodology to be used in the calculation. However that advice has since been withdrawn, and has not yet been replaced. This matter cannot be resolved in an individual local development plan or through the examination of it. The role of the local development plan is to ensure that sufficient sites that are either already effective, or are capable of becoming effective during the plan period, are allocated, and that these will be sufficient to enable the housing land requirements to be met. As set out above, I am satisfied that this local development plan does so.

54. Local development plans should also provide for a five years' effective housing land supply to be maintained at all times. This plan does so through the terms of Policy 17, which provides the means of addressing any shortfall that is identified. Scottish Planning Policy at paragraph 123 confirms that the annual housing land audit is the tool to be used to identify any such shortfall, and this too is already reflected in Policy 17.

55. In these circumstances I conclude that the provisions of the local development plan in this respect are appropriate, and that no modification is required.

Policy 17 'Land for housing'

56. For the reasons explained above, I consider that it is necessary for the local development plan to confirm that it is a statutory requirement for it to be consistent with the strategic development plan. Clydeplan has set out the housing supply targets and housing land requirement for each of its constituent councils' areas. I find that it is therefore appropriate that this is explicitly referred to in the local development plan as being the basis for the plan's provisions in relation to land for housing. The relevant place is in Policy 17 and its associated supporting text.

57. Based on my conclusions above, I consider that the references should relate to the whole of the period from 2012 to 2029 which is covered by Clydeplan, to the all-tenure housing supply target and housing land requirement for the whole of Inverclyde, and to the scale of the house completions which have already been delivered between 2012 and 2017 and contribute to meeting that housing supply target.

58. The policy should also confirm that the sites listed in Schedules 3 and 4 are to be allocated to meet the housing land requirement of the strategic development plan, and that proposals for housing development on these sites will be supported in principle, subject to consideration of detailed matters.

59. As a consequence, I find that the retention of the first three paragraphs of paragraph 7.2 would be inappropriate. It is not the role of the council, in preparing its local development plan, to seek to re-interpret the housing need and demand assessment which informed the preparation of Clydeplan. Nor is it appropriate to restrict the time horizon of the housing land allocations in this plan to 2024, which would be contrary to the requirements set out in Policy 8 of Clydeplan. It would also be contrary to Scottish Planning Policy which, at paragraph 119, confirms that local development plans such as this are required to “allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption”.

60. I therefore conclude that Policy 17 and its supporting text at paragraph 7.2 require to be amended accordingly.

61. I am satisfied, however, that criterion d) of this policy, in referring to ‘new greenfield release sites in the Inverclyde villages’, will also apply to any proposals there which relate to land designated as green belt, as these would also be defined as greenfield.

62. I am also satisfied that Policy 17 already sets out a sufficient commitment by the council to maintaining a five years’ effective housing land supply at all times, which is to be monitored through the preparation of an annual housing land audit. In doing so, it is consistent both with Policy 8 of Clydeplan and with Scottish Planning Policy.

63. In relation to the concerns raised by the Strathclyde Partnership for Transport, I am satisfied that Policy 17 already ensures that infrastructure and service constraints will be taken into account when the release of any additional land for housing development is being considered. This is because it confirms that the council will have regard to the policies applicable to the site, which include Policy 11 in relation to transport and Policy 39 in relation to the water environment. The potential for new development proposals to give rise to any other infrastructure constraint would clearly be a material consideration to which the planning authority should have regard when determining any planning application.

Policy 18 ‘New housing development’

64. Both Schedule 3 and Schedule 4 identify housing development opportunity sites. I consider that it is appropriate that Policy 18 should confirm that this plan provides support for new housing development proposals on all of these sites, whether they are contained in Schedule 3 or in Schedule 4. I therefore consider it appropriate to amend the wording of Policy 18 accordingly.

Accelerated delivery

65. I do not consider that the use of the term ‘accelerated delivery’ requires clarification in the plan because, as explained above by the council, it is not a technical term.

Reporter’s recommendations:

1. Modify Policy 17, by adding to it a new first paragraph, to state: “In order to enable Clydeplan’s all-tenure housing supply target for the whole of Inverclyde, of 4,400 house completions between 2012 and 2029, to be delivered, proposals for housing development on the sites listed in Schedule 3 and Schedule 4 of this plan and shown on the proposals

map will be supported in principle, subject to detailed consideration.”

2. Modify paragraph 7.2 by replacing the first three sentences with: “The Clydeplan strategic development plan has established that the all-tenure housing supply target for the whole of Inverclyde for the period from 2012 to 2029 is for a total of 4,400 house completions. By adding a 15% ‘generosity allowance’, it also confirmed that an all-tenure housing land requirement for 5,070 houses should apply. This is intended to provide sufficient sites to enable that level of completions to be delivered. The target is ambitious, as it reflects the council’s aim of achieving the re-population of Inverclyde. In the five years to 2017, some 788 house completions have already been achieved. That leaves this plan being required to provide sufficient land to enable a further 3,612 new homes to be completed by 2029, and to allocate land with capacity for around 4,150 house (calculated by adding the 15% ‘generosity allowance’). This plan is consistent with these requirements of Clydeplan, as it will support housing development on each of the sites listed in Schedules 3 and 4, and as shown on the proposals map. These sites have a total capacity for some 6,100 houses.”

3. Modify both criterion d) of Policy 17, and the penultimate sentence of paragraph 7.2, by replacing “....to be available for social rent”, with “....to be for affordable housing” in each.

4. Modify Policy 17 by adding a final paragraph to state: “Further information and advice on the provision of affordable housing on greenfield sites in the Inverclyde villages will be provided in supplementary guidance.

5. Modify the first sentence of Policy 18, by replacing “identified in Schedule 4”, with “identified in Schedules 3 and 4”.

6. Modify the penultimate sentence of Policy 18, by replacing “....to be available for social rent”, with “....to be for affordable housing”.

Issue 6	Housing Sites in the Inverclyde Housing Market Area - Greenock	
Development plan reference:	Schedule 4, Pages 25-26	Reporter: Sinéad Lynch
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Andrew McIntyre (2) Michael McLoone (3) William Northveth (11) Jimi Lafferty (12) William White (13) Mr & 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 & 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 & Mrs Campbell (61) Lauryn Queen (62) Lily Curran (63) John Deafley (64) Robert Bradley (65) Paul Bryson (66) Claire Duffy (67) Gerardine Barron (68) C Hughes (69)</p>	<p>David Dalglish (231) Lesley Dalglish (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)</p>	

Christopher Ayliffe (71)	J McIntosh (274)
Arjan Kranenbarg (72)	Mark Sheridan (275)
Gerry Stodter (73)	Michael Hodge (287)
Nathalie Thorburn (74)	Network Rail (288)
Elaine McKerracher (75)	Gillian McColgan (297)
Kathleen Beattie (76)	Isabel Campbell (304)
Greg Cooper (77)	Ian Campbell (306)
Deborah Bradley (78)	Marion Lappin (307)
Mr & Mrs Mohan (82)	Myra Holloway (309)
Mr & Mrs O'Donoghue (83)	Susan Gillespie (310)
A Cumming (84)	Duncan MacDougall (312)
Gerald McKay (87)	Donna Welsh (314)
Mr & Mrs Dillon (88)	R Paton (315)
Nicola Wilson (97)	Christopher Forbes (329)
George Lappin (98)	Jean Mackenzie (330)
David Wagstaff (104)	Karen McGhee (331)
Mr & Mrs Forbes (111)	Lewis Forbes (332)
Mr & Mrs Purdie (112)	Jenna Forbes (333)
Charon Singh (113)	Cheryl Brown (334)
Patrick O'Donnell (119)	Magdalena Brown (335)
Gerard Hampsey (120)	Nicola Canney (336)
Michael McTiernan (121)	Lavinia McNeill (337)
Gordon Robertson (122)	Michelle Johnston (338)
James McGhee (126)	Carol Morrison (339)
Norma Wade (127)	Diane Knox (340)
Lynn Perkins (128)	Julie Scott (341)
Greenock Golf Club (129)	Robyn McLaughlin (380)
Mark Hourston (130)	Robert Beveridge (381)
Jo Molloy (153)	Mr & Mrs Deveney (402)
Mr & Mrs Jackson (154)	G Woods (404)
Andrew Ross (158)	Andrew Burns (409)
Gillian Watters (160)	Deric Steel (416)
Mr & Mrs Reynolds (163)	M Hunter (428)
G Baynes (164)	Gordon Hunter (429)
Lynda Hainan (165)	Christopher Robbins (438)
Gordon Duffy (166)	Woodland Trust Scotland (460)
S Collins (167)	Mr & Mrs McGhee (471)
Craig Collins (168)	Scottish Natural Heritage (484)
Yvonne Chan (169)	West College Scotland (494)
Leo Chan (170)	WT Crawford (496)
Winnie Chan (171)	Robert Layton (498)
Ken Chan (172)	Roy Sharpe (500)
Josephine Chan (173)	Lauramay Hourston (501)
Clark Wainwright (174)	Ann Hughes (502)
Gordon Baynes (175)	Lorna McDonald (503)
Chris McArthur (176)	Aidan Conway (504)
Ian Smith (177)	Derek McDonald (505)
David Blair (178)	Stewart McArthur (506)
Brian Homer (179)	Michael Dyer (507)
Marie McNeill (180)	I MacGillivray (508)
Hugh Spiers (181)	Megan Conway (509)
Paul Skilling (182)	Rhonda Conway (510)

<p>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)</p>	<p>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) Tamzin Dolan (572)</p>
<p>Provision of the development plan to which the issue relates:</p>	<p>New Housing Development (Policy 18)</p>

Planning authority's summary of the representation(s):

Andrew McIntyre (2), Michael Hodge (287), Christopher Robbins (438), Mr & Mrs McGhee (471)

- Objects to/concerned about development at Housing Development Opportunity R23 Renton Road, Greenock. Reasons include:
 - Development would reduce property values
 - Negative impact on amenity for existing residents during construction
 - Development would restrict views
 - Development would have a negative impact on wildlife
 - The road (unsure which) is not adopted and is in need of repair
 - The roads are not gritted in the winter
 - Development would increase traffic creating parking and safety issues, including during development
 - Development would create overpopulation
 - 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
 - The Green Belt
 - Parking for the development will negatively impact existing resident amenity
 - The site includes a nature trail
 - There are issues with water pressure and drinking water in the area
 - Planning permission has been denied for this site in the past for valid reasons

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)

- Objects to the designation of Housing Development Opportunity R42 Papermill Road, Greenock.
 - Loss of children's play area: longstanding and popular; well kept and safe; local people fought to have redesigned recently; used by local children as well as children from the wider area; proposed new development at Peat Road will increase demand; 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; removing it is not in line with the Getting It Right For Every Child value; will negatively impact the health and wellbeing of children contrary to current focus on rising levels of childhood obesity; helps keep kids off the street and aids younger kids physical and social development
 - The open space part of the site is used by the community for events and by 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 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. Parking problems at the site would also 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), Tamzin Dolan (572)

- Objects to/concerned about the designation of Housing Development Opportunity R40 Killochend Drive, Greenock for reasons including:
 - 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 disturbance during 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 for reasons including: 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), E A 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 two planning applications for 78 flats and houses were also being consulted on during the Proposed Plan consultation and many of the responses refer to these proposals). Reasons include:
 - 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), Kincaid Court Residents (563)

- Objects to/concerned with the designation of Housing Development Opportunity R20 Ratho/MacDougall Street, Greenock for reasons including:
 - 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 Cartsdyke 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 as 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 as the access road is too narrow and in a state of disrepair, and 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 (sic) 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 and this proposal does not achieve this. Research into where social housing should be provided (not isolated, near town centres, away from traffic, accessible for those with disabilities, near education and employment opportunities and public transport, including shops), which has 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 land at Lyle Road being omitted from the Proposed Plan 2018.
- Aware that the plan seeks to avoid building on open space but as 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

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) (572)
- 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)
- Introduce a site specific developer requirement for Housing Development Opportunity

R43 Peat Road/Hole Farm, Greenock, stating 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 Ravenscraig Hospital, Greenock from the Proposed Plan (84) (98) (111) (112) (126) (127) (128) (158) (380) (404) (428) (496) (498) (566)
- Remove R47 Ravenscraig 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)
- Establish a buffer zone 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)
- Include the following developer requirement 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)
- Amend Schedule 4 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 (20, (287), (438), (471)

- This site is identified as a residential development opportunity in the adopted Local Development Plan (Document CD030) and in the 2005 Local Plan (Document CD032). 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 (Document CD055) and another for 7 houses on the norther part of the site, along Renton Road, was approved in 2012 (Document CD056). The western part of the site was also included in the Strategic Housing Investment Programme between 2012 and 2015 (Documents CD057, CD058, CD059), but has not been included since.
- The Council notes that there are 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, with no impact on the Green Belt.
- Planning applications for housing have also been approved on the site in the past (Documents CD055 and CD056). 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 (3), (12), (15), (16), (17), (18), (19), (22), (24), (27), (28), (30), (32), (35), (43), (60), (484)

- 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 2017 and 2018 (Documents CD060 and CD061). 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 (Document CD011) 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 (11), (13), (14), (16), (20), (21), (33), (34), (39), (40), (41), (42), (45), (48), (50), (66), (69), (72), (78), (82), (87), (88), (97), (113), (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), (572)

- The site is identified as a residential development opportunity in the adopted Local Development Plan (Document CD030). It sits on 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 9 townhouses was approved in 2006 (Document CD062), while a further application for 31 flats was refused in 2011 and dismissed at the subsequent appeal in 2012 (Document CD063). The site has been included in the Strategic Housing Investment Programme since 2012 with the exception of 2013 (Documents CD057, CD059, CD060, CD061).
- 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 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 (08/0300/IC) for housing (Document CD063) 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 meet this requirement.
- The tenure and capacity set out in Schedule 4 are indicative and do 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 (25), (40), (42), (58), (59), (60), (61), (62), (64), (65), (67), (71), (73), (74), (75), (76), (77), (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), (381), (460), (567), (568), (569), (570)

- 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, number of units and impact on wildlife, will be assessed as part of the determination of the planning applications that are currently under consideration (18/0127/IC and 18/0128/IC) (Documents CD064 and CD065).
- While the Council notes that there are concerns about the impact of development at this site on property values and house sales, it does not consider these to be 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 (Document CD037). 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 (Document CD010) (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 (63), (104), (121), (163), (563)

- 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 Cartsydyke 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 (Document CD037). 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 Cartsydyke Station from Bawhirley Road.
- It is considered that existing uses on the site can be relocated to alternative premises/sites within Inverclyde.
- It is considered that a sufficient supply of business and industrial land throughout Inverclyde remains following the allocation of this site for housing (Document CD066).
- It is not considered that any modification to the Plan is required in relation to this matter.

Lyle Road (former Holy Cross School), Greenock (68)

- 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 adopted Local Development Plan Examination (Document CD031) (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 (83), (460)

- 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 (84), (98), (111), (112), (119), (126), (127), (128), (158), (288), (304), (306), (307), (309), (310), (312), (314), (315), (329), (330), (331), (332), (333), (334), (335), (336), (337), (338), (339), (340), (341), (380), (404), (428), (429), (496), (498), (566)

- 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 (17/0025/LB) (Document CD067) and an application for the development of the site for 198 houses is pending (18/0205/IC) (Document CD068).
- 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 2005 Local Plan (Document CD032), 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 (Document CD066) 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, which has agreed that it is beyond practical repair and can be demolished as per application 17/0025/LB (Document CD067).

- 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 (Document CD069) 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) (129)

- 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 (Document CD012), 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 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) (153)

- 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 (484)

- 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 Document CD049. A clarification statement (Document CD011) 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 (484)

- 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.

Reporter's conclusions:

1. My examination of the plan is limited by regulations to addressing only the unresolved issues which have been raised in representations. The council has listed above a number of matters raised in representations which are in support of the provisions of the plan, or which simply make comments and do not seek modifications to the plan. Therefore, unless these relate to an issue which is unresolved, they will not be addressed in my conclusions.

2. It should also be noted that the order of the sub-headings that I use in reaching my conclusions does not wholly correspond with those used by the council above in its response to the representations, as I have ordered my conclusions based on the sequence of sites as set out in Schedule 4 of the proposed plan.

R20 – Ratho Street/MacDougall Street

3. This site lies to the east of Greenock, in a mixed industrial and residential use area. At present it is partially occupied with commercial and industrial units with an area of open space bordering the A8 to the north. Cartsyke railway station lies to the south of the site. It is allocated in the plan as having capacity for 100 private homes.

4. Findings in relation to housing land supply in Inverclyde are set out at Issue 5 of this examination. There it is concluded that sufficient land has been allocated to meet the all-tenure housing land requirement for Inverclyde, for the whole of the plan period. It should be noted that this site at Ratho Street/MacDougall Street in Greenock is assumed to contribute to meeting that target through the provision of 100 homes.

5. From my site visit, I note the tenements on MacDougall Street and the apartments and houses on Ratho Street. I am satisfied that at a notional capacity of 100, the site would have similar density to that of existing homes in the vicinity.

6. The council advises that there remains sufficient business and industrial land available in Inverclyde in the plan period should this site be allocated for residential development. The council advises that existing uses can be relocated to alternative sites and/or premises. I did note the operational use onsite, but also observed the many vacant and available commercial/business/industrial premises and sites across Inverclyde on my site visits. I find that the relocation of the existing businesses on site would be possible.

7. At present, the details of the layout and design of any development at Ratho Street/MacDougall Street are not known. The interaction of the existing industrial uses and residential development and new residents is an issue that would be carefully assessed at the development management stage. Solutions for any potential traffic and/or safety impacts on the road network would also be assessed in full at that stage, although I note that the council's Road Service did not raise any significant concerns regarding additional traffic.

8. The council advises that the southern entrance to Cartsyke Station will not be affected by the proposed development of the site. Having no evidence to the contrary, I am satisfied that the southern entrance to the station will remain operational and unaffected by development.

9. Policy 7 – Surface and Waste Water Drainage requires development proposals to demonstrate that both surface and waste water can be appropriately drained. I find that the development management process would be the appropriate place in the planning process to assess such issues and that the plan makes adequate provision for this assessment. Flooding and environmental issues are again matters that would be dealt with at the planning application stage.

10. Overall, I conclude that the inclusion of the site at Ratho Street / MacDougall Street as a new residential development opportunity site for 100 homes is appropriate and no modification to the plan is required.

R22 – Cardross Crescent (Former King’s Glen School)

11. Cardross Crescent is a brownfield site which lies to the south of Greenock, in an elevated position with panoramic views to the Firth of Clyde. The site has been cleared and at the time of my site visit construction activity was under way. The site previously was occupied by King’s Glen primary school which has been demolished. Established residential development lies to the north and west, with the B788 Kilmacolm Road to the south and the greenbelt and a Local Nature Conservation Site (LNCS) to the west.

12. A representation has raised concerns regarding access to the site, which is from Cardross Crescent. The road is narrow and at my site visit I noted that traffic is limited to one-way only due to on-street parking. I agree with the council that access to the site is a matter that would need to be addressed, but I consider that it should be at the development brief stage rather than planning application stage to ensure a satisfactory design solution at an early stage for the site and existing residents.

13. Issues such as noise are matters that could be addressed if required at the development management stage. The council is proposing to prepare a development brief for the site that would include the need to identify a buffer zone to the LNCS to the west.

14. I am satisfied that the approach suggested by the council would resolve the issue raised in the representations, but I note that the site at Schedule 4 does not have any mention of the development brief in the notes section.

15. For completeness, I conclude that the plan should be amended to include a note in the final column of the entry for site R22 specifying that a development brief should be prepared for the site.

R23 – Luss Avenue/Renton Road

16. This is a greenfield site which lies on the southern edge of Greenock. It is surrounded by established residential development to the north, east and west and by open space and greenbelt to the south. It is in an elevated position, rising north to south with views across the Firth to the north and open countryside to the south.

17. There has previously been consent for residential development on parts of the site, most recently for 7 homes in 2012 and 31 homes in 2006. The site had been included in the Strategic Housing Implementation Programme (SHIP) 2012-2015 for affordable homes. It is included in LDP 14 as site r20, with a total capacity of 31 homes. In the proposed plan, it has an indicative capacity for 50 private homes.

18. Representations have raised a number of concerns, covering a wide range of issues. Some of the issues raised are not material to the planning system, including but not restricted to matters such as property values, road maintenance and views to and from existing and new houses. As such matters are not material to the planning system, I have not taken them into account in reaching my conclusions in relation to the site. Comments made relating to previous planning applications have been taken into account in reaching my conclusions, where they are relevant to the issues raised.

19. The potential impact of the development on the green belt has been raised but not quantified. I find that the green belt would not be impacted upon by this development, as

the boundary of the green belt in this location is to the south of the proposed development.

20. A number of representations have raised the issue of potential detrimental impact on the neighbourhood arising from housing being developed on the site. The impacts have not been specified nor has any evidence been submitted to clarify what those impacts might be or why they might arise from residential development. I am satisfied that there is no evidence that the provision of new homes on this site would, by its nature, have a detrimental impact on the residential amenity of the surrounding neighbourhood.

21. In relation to traffic and traffic safety issues, I note that the council's Roads Service did not raise any issues in relation to either the existing road network in the area or the potential impact this development of 50 homes may have on that network. Representations have raised concerns about parking in the area. No evidence has been submitted to support these concerns. Should any development proposal proceed, the potential impact on the road network and parking is a matter that would be fully assessed through the development management process. I am satisfied that the issue of traffic and parking arising from the development of this site could be managed through the application of both the policies of this plan and the appropriate standards.

22. At present, the details of the layout and design of any development at the site are not known. I consider that it is clear from Policy 20- Residential Areas of this plan that proposals for development will be assessed with regard to the impact on the amenity, character and appearance of the area, and any potential impact on water pressure and quality. The impact on existing homes would have to be acceptable, including any potential impact on privacy, safety and amenity. There would be opportunities for participation in the development management process once a planning application is submitted and I am satisfied that this would be the most appropriate point in the planning process to consider such potential impacts.

23. The capacity of local amenities and services to cope with the additional 50 homes has been questioned in representations, including the capacity of schools, recreation facilities and healthcare providers. The council advises that no concerns were raised by the council services that were consulted during the plan preparation process. I am satisfied that should any need arise from the proposed development, then it could be addressed through the developer contribution mechanism during the development management process for assessing a planning application.

24. The potential impact on wildlife and habitats and the nature trail are matters that would be best addressed at the development management stage, when details of any proposal are known.

25. Overall, I conclude that the continued inclusion of the site at Luss Avenue/Renton Road as a residential opportunity site for 50 homes is appropriate and no modification to the plan is required.

R39 – Lyle Road (Former Holy Cross School)

26. This is a cleared brownfield site to the south-west of Greenock. It sits within an established residential area, in an elevated position on the corner of Lyle Road and Grieve Road. It is allocated in the proposed plan for residential development with capacity for 15 private homes. To the north lies open space, to the south, east and west are residential

areas.

27. A representation has raised the issue of traffic and road safety impacts arising from the development of this site. I note that the council's Roads Service did not raise any issues in relation to either the existing road network in the area or the potential impact this development of 15 homes may have on that network. Should any development proposal proceed, the potential impact on the road network and parking is a matter that would be fully assessed through the development management process. I am satisfied that the issue of traffic and parking arising from the development of this site could be managed through the application of both the policies of this plan and the appropriate standards.

28. I conclude that no modification to the plan is required.

R40 – Killochend Drive

29. This is a greenfield site which lies on the southern edge of Greenock. It is surrounded by established residential development to the north and west and by open space and greenbelt to the south. It is in an elevated position with views to the open countryside to the south.

30. There has previously been consent for residential development for 9 houses in 2006. The site had been included in the Strategic Housing Implementation Programme (SHIP) since 2012 with the exception of 2013. It is included in LDP 14 as site r25, with a total capacity of 33 homes. In the proposed plan, it has an indicative capacity for 16 affordable homes.

31. Representations have raised a number of concerns, covering a wide range of issues. Some of the issues raised are not material to the planning system, including but not restricted to matters such as property values, road maintenance and views to and from existing and new houses. As such matters are not material to the planning system, I have not taken them into account in reaching my conclusions in relation to the site. Comments made relating to previous planning applications have been taken into account in reaching my conclusions, where they are relevant to the issues raised.

32. A number of representations have raised the issue of potential detrimental impact on the neighbourhood arising from affordable housing being developed on the site. The impacts have not been specified nor has any evidence been submitted to clarify what those impacts might be or why they might arise from affordable residential development. I am satisfied that there is no evidence that the provision of new affordable homes on this site would, by its nature, have a detrimental impact on the residential amenity of the surrounding neighbourhood.

33. In relation to traffic and traffic safety issues, I note that the council's Roads Service did not raise any issues in relation to either the existing road network in the area or the potential impact this development of 16 homes may have on that network. Should any development proposal proceed, the potential impact on the road network and parking is a matter that would be fully assessed through the development management process. I am satisfied that the issue of traffic and parking arising from the development of this site could be managed through the application of both the policies of this plan and the appropriate standards.

34. At present, the details of the layout and design of any development at the site are

not known. I consider that it is clear from Policy 20- Residential Areas of this plan that proposals for development will be assessed with regard to the impact on the amenity, character and appearance of the area. The impact on existing homes would have to be acceptable, including any potential impact on privacy, safety and amenity. There would be opportunities for participation in the development management process once a planning application is submitted and I am satisfied that this would be the most appropriate point in the planning process to consider such potential impacts.

35. The capacity of local amenities and services to cope with the additional 16 homes has been questioned in representations, including the capacity of schools, recreation facilities and healthcare providers. The council advises that no concerns were raised by the council services that were consulted during the plan preparation process. I am satisfied that should any need arise from the proposed development, then it could be addressed through the developer contribution mechanism during the development management process for assessing a planning application.

36. The potential impact on wildlife and habitats and the nature trail are matters that would be best addressed at the development management stage, when details of any proposal are known.

37. Overall, I conclude that the continued inclusion of the site at Killochend Drive as a residential opportunity site for 16 affordable homes is appropriate and no modification to the plan is required.

R42 – Papermill Road

38. A number of representations have objected to the inclusion of this site as a residential opportunity for 40 affordable homes.

39. The council has advised that the site was included in the proposed plan in error, as the site comprises active open space in the form of playing pitches, a playground and open space.

40. In these circumstances, I conclude that the reference to site R42 Papermill Road should be removed from Schedule 4 of the plan and from the proposals map.

R43 Peat Road/Hole Farm

41. This is a large 16.4-hectare brownfield site to the south-west of Greenock. It had previously been developed for housing, but the site is substantially clear of built elements. I note from my site visit that basic infrastructure such as roads, street lighting and bus routes remain on site. It is otherwise open scrubland sloping downwards from south to north. Residential areas lie to the south, east and west, with a primary school also to the south. The A78 forms the northern boundary of the site.

42. In the plan, the site is identified as a housing development opportunity site in Schedule 4 requiring a development framework and has an indicative capacity of 102 affordable homes. As well as being identified in Schedule 4, it is also identified in Schedule 2 of the plan as a Priority Place where the preferred strategy is for housing, community facilities and neighbourhood retail. Priority Place Supplementary Guidance will also apply to this site.

43. Representations have raised a number of concerns, covering a wide range of issues. Some of the issues raised are not material to the planning system, including but not restricted to matters such as property values and the potential impact on house sales. As such matters are not material to the planning system, I have not taken them into account in reaching my conclusions in relation to the site.

44. A number of representations have raised the issue of potential detrimental impact on the neighbourhood arising from affordable housing being developed at Peat Road / Hole Farm. The impacts have not been specified nor has any evidence been submitted to clarify what those impacts might be or why they might specifically arise from affordable residential development. I am satisfied that there is no evidence that the provision of new affordable homes on this site would, by its nature, have a detrimental impact on the residential amenity of the surrounding neighbourhood.

45. The council advise that there are planning applications for the site currently being assessed. I consider that issues raised in representations which relate to the potential impact on existing homes would be best addressed through that process. There are opportunities for participation in the development management process once a planning application is submitted and I am satisfied that this is the most appropriate point in the planning process to consider such potential impacts.

46. In relation to traffic and traffic safety issues, I note that the council's Roads Service did not raise any issues in relation to either the existing road network in the area or the potential impact this development may have on that network. Should any development proposal proceed, the potential impact on the road network and parking is a matter that would be fully assessed through the development management process. I am satisfied that the issue of traffic and parking arising from the development of this site could be managed through the application of both the policies of this plan and the appropriate standards.

47. The capacity of local amenities and services to cope with the additional homes has been questioned in representations, including the capacity of schools. The council advises that no concerns were raised by the council's education service when consulted during the plan preparation process. I am satisfied that should any need arise from the proposed development, then it could be addressed through the developer contribution mechanism during the development management process for assessing a planning application.

48. Woodland Trust Scotland has sought to minimise any potential impacts from development on the ancient woodland. The council has confirmed that the development brief for the site will specifically address the protection of the ancient woodland.

49. The principle of allocating the site for residential development has been questioned in representations. I am content that the allocation of this site for housing can make an important contribution to the priority outcome identified by the council of 're-population', particularly when applied in conjunction with the plan's policy (Policy 1) for creating successful places. It would also provide the opportunity to upgrade the overall quality of the stock of affordable homes in Greenock and across Inverclyde. This would help to retain existing households, as well as to attract new ones to live in Inverclyde and Greenock. Issue 5 of this examination concludes that sufficient land has been allocated to meet the all-tenure housing land requirement for Inverclyde, for the whole of the plan period. This site contributes to meeting that housing land requirement.

50. Overall, I conclude that the continued inclusion of the site at Peat Road/Hole Farm as a residential opportunity site for new homes is appropriate and no modification to the plan is required.

R45 – Upper Bow

51. The council has confirmed that the boundaries of site R45 Upper Bow in Greenock have been shown incorrectly on the proposals map, and has provided me with the correct boundaries in core document CD049. I note that the consequence of amending the boundaries of this site, is that boundaries of site R44 Bow Farm will also be modified.

52. In these circumstances I find that it is appropriate to amend the boundaries shown on the proposals map for site R45 Upper Bow, and consequently for site R44 Bow Farm, as shown in core document CD049

R46 – Merlin Lane

53. Scottish Natural Heritage (SNH) has suggested that the existing open space which lies to the north-west of the site be integrated with the surrounding development through a developer requirement.

54. From my site visit, I note that the development is substantially complete, and I conclude that at this stage of the development process it would not be possible to impose the requirement suggested by SNH. I therefore conclude that it would not be appropriate to amend the plan.

R47 – Ravenscraig Hospital

55. This site is a brownfield site which lies to the south-west of Greenock. It is the site of the former Ravenscraig Hospital and includes the B-listed hospital building, the modern buildings and all of the built footprint of the former hospital. All of the site is covered by a Tree Protection Order (TPO) and it is surrounded by designated open space. The green belt and Clyde Muirshiel Regional Park are to the south, the A78 is to the north and there are established residential areas to the east and west. An application to demolish the hospital was approved in 2017 and Historic Scotland has confirmed that the building is beyond repair and can be demolished. An application for 198 homes has been submitted to the council.

56. The site is allocated as a mixed tenure housing development opportunity site for 200 homes in the plan. It had been included as a site for housing in both the 2005 and 2014 plans. I am content that the allocation of this site for housing can make an important contribution to the priority outcome identified by the council of 're-population', particularly when applied in conjunction with the plan's policy (Policy 1) for creating successful places. It would also provide the opportunity to upgrade the overall quality of the stock of affordable homes in Greenock and across Inverclyde. This would help to retain existing households, as well as to attract new ones to live in Inverclyde and Greenock. Issue 5 of this examination concludes that sufficient land has been allocated to meet the all-tenure housing land requirement for Inverclyde, for the whole of the plan period. This site contributes to meeting that housing land requirement.

57. The council advises that 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. The development brief 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, as suggested in the representation from Network Rail. For completeness, I conclude that the plan should be amended to include a note in the final column of the entry for site R47 specifying that a development brief should be prepared for the site.

58. Concern has been expressed that as the site has not been taken forward for private homes, it should not be considered suitable for affordable homes. I find that the assessment of site viability differs between that for homes to be sold on the open market by a private company and sites developed by a housing association or other provider for social housing. The assessment of viability for each would be very different in required outcomes and not being viable for private development does not preclude being viable for social housing development.

59. A number of representations have raised the issue of potential detrimental impact on the neighbourhood arising from affordable housing being developed at the former Ravenscraig Hospital site. The impacts have not been specified nor has any evidence been submitted to clarify what those impacts might be or why they might specifically arise from affordable residential development. I am satisfied that there is no evidence that the provision of new affordable homes on this site would, by its nature, have a detrimental impact on the residential amenity of the surrounding neighbourhood.

60. The capacity of local amenities and services to cope with approximately 200 additional homes has been questioned in representations, including the capacity of schools. The council advises that no concerns were raised by the council's services that were consulted during the plan preparation process. I am satisfied that should any need arise from the proposed development, then it could be addressed through the developer contribution mechanism during the development management process for assessing a planning application.

61. 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. I am satisfied that any potential impact on traffic and safety could properly be assessed at the development management stage of any development proposal. I note that access to public transport from the site is good, with Branchton rail station within walking distance to the north-west of the site and bus services available on Inverkip Road (A78).

62. Representations have raised concerns about the potential impact on the open space from the proposed development. I find that this matter could be addressed during the development management process for assessing a planning application, when design, layout and / or technical solutions could be found. Any issues relating to contamination or Japanese Knotweed or asbestos could also be addressed at that stage.

63. Basing new development on the footprint of the old buildings maximises the open space on site, retains access to the countryside to the south, to the Greenock Cut and the Regional Park. It would have minimal impact on the area covered by the TPO. It also offers the opportunity to access services and utilities in an efficient manner. I am satisfied that such an approach has merit.

64. Overall, I conclude that the inclusion of the site at the former Ravenscraig Hospital as

a residential opportunity site for new homes is appropriate. For completeness, I conclude that the plan should be amended to include a note in the final column of the entry for site R47 specifying that a development brief should be prepared for the site.

R50 - Auchmead Road

65. This brownfield site was previously occupied by Ravenscraig Primary School. It lies to the south-west of Greenock.

66. A representation has queried why a parcel of land has not been included within the development opportunity, as it is overgrown, and the fencing is in a state of disrepair.

67. The council advises that this matter is being investigated as part of the current planning application for the site.

68. I find that without a fuller response from the council, it would be inappropriate for this examination to include land in a development opportunity site which may have been excluded from the development site for valid reasons. The issue raised in the representation is being addressed by the council and so I conclude that no amendment to the plan is required.

Lyle Road, Greenock

69. A representation is seeking to have this 1-hectare site allocated as a residential development opportunity. It is allocated as open space in the plan and is part of Greenock Golf Club. The representation sets out a number of reasons for this suggestion, including the relatively small loss of the open space, and the ability to raise capital for investment in the golf club. The club has offered to withdraw another proposal at Forsyth Street should this proposal be acceptable. The site has been assessed through the plan preparation process, where the loss of open space was not supported.

70. In relation to any possible housing land deficit, this examination has concluded that sufficient land has been allocated to meet the all-tenure housing land requirement for Inverclyde, for the whole of the plan period. This matter is discussed in detail at Issue 5 of this examination, but I am satisfied that this site is not required to be allocated for residential development as there is no plan deficit to be addressed.

71. The council's assessment of the site concluded that the impact of any loss of open space or habitat would require mitigation. No information has been proved to this examination addressing this issue.

72. I find that the site is appropriately allocated as open space, and any other allocation in this plan would be contrary to Policy 35 – Open Spaces and Outdoor Sports Facilities which does not permit the loss of open space of quality or value, without the provision of an open space of equal or enhanced quality and value within the development or its vicinity. In the absence of any such measures being confirmed, I conclude that no modification to the plan is required.

Finnart Street, Greenock

73. West College Scotland has made a submission objecting to the omission of the 1.6-hectare site at Finnart Street in Greenock town centre from the schedule of housing

development opportunity sites in the plan. The proposed relocation of the college could mean that the site is available for development which could include housing.

74. The council advises that the site has not been assessed through the plan process or Strategic Environmental Assessment, as it had not been submitted until the proposed plan consultation stage.

75. The college has provided supporting information on its preferred option of relocating to a single campus at East India Dock and has representations to Issues 1, 4 and 10 of this examination. Conclusions on submissions to those Issues are found in the relevant sections of this report. In summary, it has been concluded that an educational institution is unlikely to be compatible with the preferred strategy of a mixed use development, due to the large scale land requirement.

76. I find that as the site is within Greenock town centre, should it become available for redevelopment in the plan period, then housing is a use that would be acceptable subject to compliance with the policies of the plan. At present, there is no clear timeline for the relocation of the campus. I am satisfied that the site's current allocation in the plan does not preclude appropriate redevelopment including for housing.

77. The principle of the relocation of the college is accepted and the council intends to include the proposed facility in the plan at Schedule 5 Community Facilities Opportunities, but with the actual location to be identified. This plan period is ten years. Site assembly, acquisition, consent and construction of such a project may take up to and beyond ten years, while the current facilities would need to remain operational until any new facility opened. The sale and consent process at the existing college sites could be concurrent, but site clearance and construction could not begin until the new facility was operational. Given the uncertainty that timeline presents, I find that inclusion in this plan as a housing development opportunity would not be appropriate without evidence that the site is or could become an effective housing site in the plan period.

78. I conclude that no modification to the plan is required.

Customhouse Way, Greenock

79. West College Scotland has made a submission objecting to the omission of its campus at Customhouse Way in Greenock Town Centre from the schedule of housing development opportunity sites in the plan. The proposed relocation of the college could mean that the site is available for development which could include housing.

80. The council advises that the site has not been assessed through the plan process or Strategic Environmental Assessment, as it had not been submitted until the proposed plan consultation stage.

81. The college has provided supporting information on its preferred option of relocating to a single campus at East India Dock and has representations to Issues 1, 4 and 10 of this examination. Conclusions on submissions to those Issues are found in the relevant section of this report. In summary, it has been concluded that an educational institution is unlikely to be compatible with the preferred strategy of a mixed use development, due to the large scale land requirement.

82. I find that as the site is within Greenock Town Centre, should it become available for

redevelopment in the plan period, then housing is a use that would be acceptable subject to compliance with the policies of the plan. At present, there is no clear timeline for the relocation of the campus. I am satisfied that the site's current allocation in the plan does not preclude appropriate redevelopment including for housing.

83. The principle of the relocation of the college is accepted and the council intends to include the proposed facility in the plan at Schedule 5 Community Facilities Opportunities, but with the actual location to be identified. This plan period is ten years. Site assembly, acquisition, consent and construction of such a project may take up to and beyond ten years, while the current facilities would need to remain operational until any new facility opened. The sale and consent process at the existing college sites could be concurrent, but site clearance and construction could not begin until the new facility was operational. Given the uncertainty that timeline presents, I find that inclusion in this plan as a housing development opportunity would not be appropriate without evidence that the site is or could become an effective housing site in the plan period.

84. I conclude that no modification to the plan is required.

Reporter's recommendations:

1. Modify Schedule 4 Site R22 with a new note as follows: "Development Brief to be prepared"
2. Reference to site R42 Papermill Road should be removed from Schedule 4 of the plan and from the proposals map
3. Modify the proposals map to amend the boundaries of sites R44 Bow Farm and R45 Upper Bow, as shown in core document CD049.
4. Modify Schedule 4 Site R47 with a new note as follows: "Development Brief to be prepared"

Issue 7	Housing sites in Inverclyde Housing Market Area - Gourock, Port Glasgow and Inverkip	
Development plan reference:	Section 7.0, Pages 21-27	Reporter: Sinéad Lynch
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>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) Michael Scott (161) Paul Carradice (162) Mary Rennie (280) Agnes Sharp (281)</p>	<p>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) 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)</p>	
Provision of the development plan to which the issue relates:	New Housing Development (Policy 18) Schedule 3: New Private Housing Development Opportunity sites, Schedule 4: Housing Development Opportunity sites	

Planning authority's summary of the representation(s):

Audrey Coyle (4)

- 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.

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)

- Object to/concerned about the R58 development opportunity at Kirn Drive in Gourock. Reasons include:
 - 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.
 - No additional capacity has been put in place to facilitate the traffic flow from existing developments in Gourock. There is also no petrol station or spare capacity at the Gourock station car park. Additional housing in Gourock is pushing the boundaries of what could be considered responsible urban development.
 - Schools and local health services are at or near capacity.
 - Adverse impact on the privacy of neighbouring areas due to new development overlooking existing properties and the close proximity of new roads
 - Increased noise, disturbance and traffic, including from construction activities and proximity of new roads within new development
 - Loss of greenspace, including woodland and grassed areas.
 - Adverse impact on wildlife within the site
 - Adverse impact on the drainage of neighbouring properties
 - Potential adverse impact on the property values of surrounding properties
 - There are many other suitable housing sites in the Plan, the purpose of which is to provide affordable housing.

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)

- Object to/concerns about the R56 Weymouth Crescent development opportunity in 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.

Michael Scott (161)

- Request that the former Langlands Park School site on Port Glasgow Road, 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.

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.

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 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, SINC 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 Langlards Park School site on Port Glasgow Road 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, 18/0159/IC (Document CD070) and 18/0160/IC (Document CD071), 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 an approved 1997 retrospective application for the building and setting up of railway layouts, IC/97/108 (Document CD072) a 2011 application for 10 residential units (withdrawn), an approved 2012 application for 10 residential units, 12/0067/IC (Document CD073) and an approved 2013 application for 8 residential units, 13/0197/IC (Document CD074). The site was identified as a ‘residential area’ in the 2005 Local Plan (Document CD032), with this designation carried forward into the current 2014 LDP (Document CD030). 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) 2017-2022 (Document CD060). The site was included in Table 7 of the Main Issues Report (Review of other potential additional housing sites) (Document CD017) and subsequently included as a residential development opportunity, for 10 affordable units, in Schedule 4 of the Proposed plan 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, 12/0067/IC (Document CD073), and a 2013 planning permission for 8 residential units, 13/0197/IC (Document CD074), both unimplemented. The site was also identified as a 'residential area' in the 2005 Local Plan (Document CD032) and the current 2014 Local Development Plan (Document CD030).

- 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 a 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 approved 2012 planning application for 10 residential units, 12/0067/IC (Document CD073), or the approved 2013 planning application for 8 residential units, 13/0197/IC (Document CD074). 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 (response reference 93) did not identify any flood risk or request a Flood Risk Assessment for the R56 development opportunity.
- 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 Gourock, this is a matter for the Local Transport Strategy (Document CD051). The Local Development Plan process 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 1 Habitat Survey, an appropriate protected species survey, and 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 opportunity 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.
- It is considered that no modifications to the Plan are required in relation to these matters.

Former Langlands Park School site, Port Glasgow

- The site 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 Proposed Plan Proposals Map (Document CD002) 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 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

- The site identified in the Development Framework (Production RD283.1) 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 2014 (Document CD030), 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) (Document CD075), 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 an 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.

Port Glasgow 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 generation by this development opportunity.
- It is considered that no modifications to the Plan are required in relation to these matters.

Kingston Dock, Port Glasgow

- This site is an area of re-naturalised brownfield land adjacent to the recently developed Kingston Dock housing area.
- A masterplan document was submitted as part of the 2005 outline planning application for the Kingston area (IC/04/336), which was approved in 2005 (Document CD076). The masterplan identified this site as a ‘commercial area’, with the intention of it being developed for a public house/restaurant/shop (Document CD077) and was subsequently identified as part of the wider residential development opportunity (r13) in the adopted Inverclyde Local Development Plan 2014 (Document CD030).
- However, since the preparation of both, the main Kingston residential development has been completed, and the site sits to the north of Lithgow Way adjacent to the formal open space area associated with the development. The pattern of the completed development is that the northern boundary of the developed area is formed by Lithgow Way and Iron Way, with the undeveloped area/open space to the north of these roads forming a buffer between houses and the river. This is recognised in the Reporter’s decision on planning application 13/0035/IC 9PPA-280-2019 (Document CD078), which states:
‘Apart from the appeal site, all of the land to the north of the access road is laid out for

open space. As it is undeveloped, albeit not landscaped, the appeal site currently appears to be part of this area of linear open space. Because of its relationship to Lithgow Way and the roundabout giving access to the housing area from the A8, the appeal site is also a prominent gateway site to the housing area.'

- The Reporter goes on to highlight concerns about residential development covering most of the site impacting on the open nature of the strip north of Lithgow Way and Iron Way and also its impact on the waterfront footpath/cycle way, which could be 'cramped' at this location compared to where it runs through the established open space area.
- The Council is of the view that the proposed site, whilst not part of the formal open space area, forms part of the setting of the Port Glasgow waterfront which now provides wide public vista of the Firth of Clyde, and any development of this site would be to its detriment.
- It is not considered that a modification to the plan is required in respect of this matter.

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 with the R54 boundary is also identified as a TPO. 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, 16/0011/IC (Document CD079).
- 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 a 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, 17/0056/IC (Document CD080).
- 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 approval for 16 residential units. 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 future 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:

1. My examination of the plan is limited by regulations to addressing only the unresolved issues which have been raised in representations. The council has listed above a number of matters raised in representations which are in support of the provisions of the plan, or which simply make comments and do not seek modifications to the plan. Therefore, unless these relate to an issue which is unresolved, they will not be addressed in my conclusions.

2. It should also be noted that the order of the sub-headings that I use in reaching my conclusions do not wholly correspond with those used by the council above in its response to the representations, as I have ordered my conclusions based on settlements in the plan area.

Port Glasgow

Site R1 – Slaemuir,

3. Findings in relation to housing land supply in Inverclyde are set out at Issue 5 of this examination where it is concluded that sufficient land has been allocated to meet the all-tenure housing land requirement for Inverclyde, for the whole of the plan period. In terms of the spatial strategy of the plan, this site is included in the Policy 2 – Priority Projects Schedule 1: Inverclyde Local Development Plan Priority Projects as part of the Affordable Housing Delivery Programme.

4. The site is located within an established residential area to the south-east of Port Glasgow and comprises 6 sites totalling some 2.9 hectares of brownfield land which had previously been used for housing and associated car parking and landscaping. I note from my site visit that some of the sites have already been built out with new homes.

5. Concern has been expressed in a representation that the site at Teviot Road, when developed, will result in a loss of privacy, daylight, garden space and outlook to existing homes.

6. At present, the details of the layout and design of any development at Teviot Road are not known. I consider that it is clear from Policy 20- Residential Areas of this plan that proposals for development will be assessed with regard to the impact on amenity, character and appearance of the area. The impact on existing homes would have to be acceptable. There would be opportunities for participation in the development management process once a planning application is submitted and I am satisfied that this would be an appropriate point in the planning process to consider such potential impacts.

7. I conclude that no amendment to the plan is required.

Former Langlands Park School Site

8. A representation is seeking to have this site allocated as a residential development opportunity. It is allocated as open space in the plan. The representation sets out a number of reasons for this suggestion, including the low quality of the open space, the remnants of the previous use including hard-standing, lack of use, difficulty in accessing the site on foot, no Tree Preservation Orders on the trees on site, no constraints to development and the potential for the site to contribute to meeting the housing land deficit identified in the representation. No supporting information has been submitted with the representation, nor has the site been assessed through either the plan preparation process or the Strategic Environmental Assessment process associated with the plan.

9. In relation to any possible housing land deficit, this examination has concluded that sufficient land has been allocated to meet the all-tenure housing land requirement for Inverclyde, for the whole of the plan period. This matter is discussed in detail at Issue 5 of this examination, but I am satisfied that this site is not required to be allocated for residential development as there is no plan deficit to be addressed.

10. At my site visit I observed the wooded nature of the site, and the steep slope downwards from south to north. I noted access points from Glasgow Road and through the cemetery but no formal access points from High Carnegie Road. The site has been included in the Scottish Natural Heritage (SNH) Woodland Inventory as part of a wider semi-natural woodland in the area.

11. I find that the site is appropriately allocated as open space, and any other allocation in this plan would be contrary to Policy 35 – Open Spaces and Outdoor Sports Facilities which does not permit the loss of open space of quality or value. It would also be contrary to Policy 34 – Trees, Woodland and Forestry which supports the retention of semi-natural woodland.

12. I conclude that no amendment to the plan is required.

Arran Avenue

13. Findings in relation to housing land supply in Inverclyde are set out at Issue 5 of this examination where it has been concluded that sufficient land has been allocated to meet the all-tenure housing land requirement for Inverclyde, for the whole of the plan period.

14. The site is located on the western edge of Port Glasgow. It is comprised of some 5.8 hectares of greenfield land adjacent to an established residential area and wholly within the Midhill Plantation / Castlehill Plantation Local Nature Conservation Site (LNCS).

15. The site had been identified as a residential development opportunity in development plans for a number of years and most recently as residential development opportunity r2 in Inverclyde LDP 14. At the Main Issues Report stage in this plan process, the site was removed as it had “been in the land supply for over 20 years with no prospect of development likely”.

16. The representation advises that the removal of the 25% affordable housing requirement has meant that the site is now viable and has submitted a development

framework report and a site effectiveness statement to support their position.

17. I am satisfied that the supporting documents demonstrate that the site could be viable, contrary to the position assumed at the Main Issues Report stage of plan preparation. The removal of the 25% affordable housing requirement has made a demonstrable difference to the effectiveness of the site and on that basis I find that the site could be re-instated as a residential development opportunity in this plan. I am satisfied that housing completions can be delivered on this site and that the site is capable of becoming effective within the plan period.

18. The council has raised the issue of the site being wholly within the LCNS, and the potential impact on the LNCS, urban form and local landscape. I find that Policy 33 - Biodiversity and Geodiversity addresses LNCS and does not prohibit development within such areas. It sets out that adverse impacts are to be minimised and where unavoidable, compensatory measures will be required. I am satisfied that should there be any adverse impacts arising from any development proposal on this site, then any appropriate mitigation or compensatory measures could be applied in accordance with plan policy. Issues relating to urban form and landscape could similarly be addressed at the development management stage of any proposal.

19. The site is currently identified in the proposed plan as being within the green belt to the east of Port Glasgow. It was not identified as being within the green belt in LDP 14. I am satisfied that the site could revert its previous status as being outwith the green belt without an adverse impact on the purpose of the green belt in this location, which is set out at paragraph 6.11 of the plan. It aims to direct development to existing towns and villages and restrict development in the green belt to appropriate types and locations. I find that the site should not be included in the green belt in this plan.

20. Overall, I conclude that the plan should be amended to include the site at Arran Avenue on the Proposals Map and Schedule 4 as a site for 115 homes. The site boundary should reflect the plan provided in the Development Framework at page 11. In addition, the designation of the site as green belt on the proposals map should be removed.

Site R7 - Port Glasgow Industrial Estate, Dubbs Road

21. This is a large site of approximately 5 hectares within an existing industrial estate, lying to the south of Port Glasgow. It is a brownfield site with vacant buildings and associated hardstanding. All buildings are in a state of disrepair with no signs of activity that I observed. The site forms the eastern end of the industrial estate and is bounded by Gareloch Road, Dubbs Road and Knocknair Street. The remainder of the industrial estate lies to the west, with further industrial development to the east. Established residential areas lie to the north and south.

22. Two representations have raised issues of negative impacts on residential amenity and traffic safety in association with the proposed allocation of the site for 200 homes, and also the potential impact on the remaining part of the industrial estate.

23. At present, the details of the layout and design of any development at Dubbs Road are not known. The interaction of the existing industrial uses and new residents is an issue that would be carefully assessed at the development management stage. Solutions for any potential traffic impacts on the road network would also be assessed in full at that

stage, although I note that the council's Road Service did not raise any significant concerns regarding additional traffic.

24. Policy 18 – New Housing Development confirms that Supplementary Guidance will be prepared by the council and will be used to assess development proposals. This site is included in Schedule 3 of this plan as a new private housing development opportunity site, and so a development brief will be required to be prepared. I also find that Policy 20- Residential Areas would ensure that proposals for development would be assessed with regard to the impact on the amenity, character and appearance of the area, including any traffic impacts. The impact on existing homes would have to be acceptable. There would be opportunities for participation in the development management process once a planning application is submitted and I am satisfied that this would be the most appropriate point in the planning process to consider such potential impacts.

25. I conclude that the inclusion of the site at Dubbs Road as a new private housing development opportunity site for 200 homes is appropriate and that no modification to the plan is required.

Kingston Dock

26. Findings in relation to housing land supply in Inverclyde are set out at Issue 5 of this examination where it is concluded that sufficient land has been allocated to meet the all-tenure housing land requirement for Inverclyde, for the whole of the plan period.

27. This is a reclaimed brownfield site to the west of Port Glasgow, between the completed residential development at Kingston Dock and the Firth of Clyde. It is currently an open area, with no formal landscaping, with sweeping views of the Clyde to the east and west. It had originally been included in the site masterplan as an area for retail and commercial development, but in LDP 2014 the site was allocated as part of a larger residential opportunity with the reference r13. The site is now identified in this plan as open space under Policy 35, where the loss of open space is not supported unless open space of an equal or enhanced quality is provided within the development or its vicinity.

28. The representation is seeking the continued inclusion of the site within Schedule 4 of the plan as a residential development opportunity, stating that it has already been identified as suitable for residential development; that it would be an opportunity to complete the development; that there is significant open space in the development already; it is required to maintain economic viability of the overall development; a change in the designation of the site could lead to a loss of confidence in other longer term regeneration projects; and that the site is of real interest to housebuilders.

29. The council explains that since the development at Kingston Dock was completed and LDP 2014 adopted, Lithgow Way and Iron Way have become the northern boundary of the developed area, with the land to the north being open space and a buffer to the Firth of Clyde. The open space accommodates the waterfront cycle way and footpath and forms part of the setting of the Port Glasgow waterfront, affording views to the east and west on the Firth of Clyde.

30. On my site visit, which was on a showery winter morning, I observed the use of the open space and the subject site. It was busy with both walkers and cyclists, with families and young children and appeared to be well used. The open views to the north, east and west across the Firth are a feature of the area and enhance the walking / cycle route and

the open space itself. I also note the visually prominent nature of the site when approaching by cycle or on foot from the east and west and by car from the east. The site if developed would also be prominent in views south from the Firth.

31. The potential negative impact on the viability of the site overall is not quantified or specified in the representation, however I appreciate that the removal of an allocation for a land use that generates income could be unsettling for owners and investors. In this instance, I am satisfied that the circumstances of the site, the pattern of completed development and value of the open space both visually and functionally provide justification for the change in plan allocation.

32. LDP 14 had allocated the site as providing up to 140 private homes. Sufficient land has been allocated to meet the all-tenure housing land requirement for Inverclyde, for the whole of the plan period, without the inclusion of this site, a matter fully discussed at Issue 5 of this examination.

33. I am satisfied that the site now performs an important open space function and visual setting for Port Glasgow and that its development for residential or indeed any other purpose would not be in the best interest of the Port Glasgow area and the site locality.

34. I conclude that no amendment to the plan is required.

Inverkip

R62 - The Glebe

35. Woodland Trust Scotland has requested that the existing trees on the cemetery boundary are retained and that additional native planting be included both as screening and to provide high quality greenspace.

36. The council agrees and advises that this site for 25 private homes will require the preparation of a development brief, including details of the retention of existing trees and the provision of native planning in any landscaping strategy. The site will be included in the Supplementary Guidance to be prepared on development briefs.

37. I am satisfied that the approach suggested by the council would resolve the issue raised in the representation, but I note that the site at Schedule 4 does not have any mention of the development brief in the notes section.

38. For completeness, I conclude that the plan should be amended to include a note in the final column of the entry for site R62 specifying that a development brief should be prepared for the site.

Gourock

R54 - Ashburn Gate

39. This is a site for 13 private houses in Gourock, in an established residential area. The site comprises a former care home and adjoining land and at the time of my site visit appeared to be under construction/conversion.

40. Scottish Natural Heritage (SNH) has identified that the wooded land to the rear of the

care home, which slopes steeply upwards to the east, is the subject of a TPO as set out on the proposals map accompanying this plan. SNH is seeking the exclusion of the TPO area from the site on the proposals map and restricting development to the brownfield element of the site only. Reference to appropriate setbacks as set out in BS5387 Trees in Relation to Construction is also sought.

41. The council advises that any development proposals would be assessed at the development management stage for any potential impact on the TPO, in accordance with Policy 34- Trees, Woodland and Forestry. This policy also provides for the preparation of Supplementary Guidance on development affecting trees which will also address requirements for buffer zones between trees and development. Restricting development to the brownfield element of the site may limit the development potential of the site, which is already limited by the steep slope of the land.

42. I find that a specific reference to BS5387 would not be appropriate in this plan, and is a matter best addressed at the development management stage of any proposal.

43. I am satisfied that the issues raised in the representation regarding the TPO area at Ashburn Gate could be resolved through the preparation of appropriate Supplementary Guidance and the assessment of any development proposal under Policy 34.

44. I conclude that no amendment to the plan is required.

R55 - Ashton Road

45. Ashton Road is a vacant, brownfield site for 11 homes with views west to the sea. At the time of my site visit the site was protected by harris fencing and there was no obvious construction activity.

46. Scottish Natural Heritage considers that the area of semi-natural woodland in the south-east part of the site should be excluded from the site as set out on the proposals map and that appropriate setbacks should be incorporated in accordance with BS5387.

47. The council advises that any development proposals would be assessed at the development management stage for any potential impact on the woodland, in accordance with Policy 34- Trees, Woodland and Forestry. This policy also provides for the preparation of Supplementary Guidance on development affecting trees which will also address requirements for buffer zones between trees and development.

48. I find that a specific reference to BS5387 would not be appropriate in this plan, and is a matter best addressed at the development management stage of any proposal.

49. I am satisfied that the issues raised in the representation regarding the wooded area at Ashton Road could be resolved through the preparation of appropriate Supplementary Guidance on Trees and Development and the assessment of any development proposal under Policy 34 of this plan.

50. I conclude that no amendment to the plan is required.

R59 - Cowal View

51. Cowal View is a greenfield site of some 0.5 hectares for 15 homes, lying to the west

of the clubhouse at Gourock Golf Club. At the time of my site visit the site was under construction.

52. Woodland Trust Scotland has suggested that the site should be removed from the plan as a residential development opportunity and the site should be protected under a TPO. Scottish Natural Heritage in a separate representation suggests that the area of semi-natural woodland within the R59 Cowal View site should be considered and incorporated into any future development proposals. Appropriate siting, design and mitigation measures should be demonstrated for any development proposal.

53. The council advises that the majority of the site was identified as native woodland, but prior to the grant of planning permission in 2017 for 16 houses, the woodland was removed from the subject site.

54. I find that as the woodland has been removed from the site and the homes are now under construction, there is little to be gained from removing the site from the plan or indeed requiring any form of mitigation to protect the now removed trees.

55. I conclude that no amendment to the plan is required.

R56 - Weymouth Crescent

56. Weymouth Crescent is a site to the south east of Gourock in an established residential area. The site was previously used as a water treatment plant and yard. This part of the site is 0.3 hectares in area and is currently grassed and fenced.

57. There has previously been consent for residential development on the site, most recently for 8 homes in 2013. The site is included in the Strategic Housing Implementation Programme (SHIP) 2017-2022 for 10 affordable homes.

58. Representations have raised a number of concerns, covering a wide range of issues. The majority if not all representations are from the surrounding housing estate. Some of the issues raised are not material to the planning system, including but not restricted to matters such as property values, occupancy rates of affordable homes, comments on previous planning consents and views to and from existing and new houses. As such matters are not material to the planning system, I have not taken them into account in reaching my conclusions in relation to the site at Weymouth Crescent.

59. The principle of allocating the site for residential development has been questioned in representations. I am content that the allocation of this site for affordable housing can make an important contribution to the priority outcome identified by the council of 're-population', particularly when applied in conjunction with the plan's policy (Policy 1) for creating successful places. It would also provide the opportunity to upgrade the overall quality of the stock of affordable homes in both Gourock and across Inverclyde. This would help to retain existing households, as well as to attract new ones to live in Inverclyde and Gourock.

60. Although some representations have suggested that this site is a greenfield site, or in the greenbelt, I find that it is neither. It has never formed part of the greenbelt in Inverclyde in any development plan that I have been made aware of. The site as a whole was an operational yard and treatment plant owned by Scottish Water and although this part of the site does not have buildings on it, it remains an undeveloped element within

the overall brownfield site. It is privately owned and there is no formal access to it as it is fenced. It is not and has not been designated open space in any development plan. The presence of bats has been observed on site, and the council has confirmed that during the development management process, any potential impact on bats and bat habitat would be assessed. I am content that is the correct process.

61. A number of representations have raised the issue of potential detrimental impact on the neighbourhood arising from affordable housing being developed on the site. The impacts have not been specified nor has any evidence been submitted to clarify what those impacts might be or why they might arise from affordable housing provision. I am satisfied that there is no evidence that the provision of affordable housing on this site would, by its nature, have a detrimental impact on the residential amenity of the surrounding neighbourhood.

62. In relation to traffic and traffic safety issues, I note that the council's Roads Service did not raise any issues in relation to either the existing road network in the area or the potential impact this development of 10 homes may have on that network. Representations have raised concerns about parking in the area and the potential impact on the junction with Hilltop Road. No evidence has been submitted to support these concerns. Should any development proposal proceed, the potential impact on the road network and parking is a matter that would be fully assessed through the development management process. I am satisfied that the issue of traffic and parking arising from the development of this site could be managed through the application of both the policies of this plan and the appropriate standards.

63. I note that Scottish Environmental Protection Agency did not identify any flood risk on the site nor did it request that a Flood Risk Assessment be prepared for the site.

64. At present, the details of the layout and design of any development at Weymouth Crescent are not known. I consider that it is clear from Policy 20- Residential Areas of this plan that proposals for development will be assessed with regard to the impact on amenity, character and appearance of the area. The impact on existing homes would have to be acceptable, including any potential impact on privacy, safety and amenity. There would be opportunities for participation in the development management process once a planning application is submitted and I am satisfied that this would be the most appropriate point in the planning process to consider such potential impacts

65. The capacity of local amenities and services to cope with the additional 10 homes has been questioned in representations, including the capacity of schools, recreation facilities and healthcare providers. The council advises that no concerns were raised by the council services that were consulted during the plan preparation process. I am satisfied that should any need arise from the proposed development, then it could be addressed through the developer contribution mechanism during the development management process for assessing a planning application.

66. Overall, I conclude that the inclusion of the site at Weymouth Crescent as a new affordable housing development opportunity site for 10 homes is appropriate and that no modification to the plan is required.

R58 – Kirn Drive

67. Kirn Drive is a site of some 5.3 hectares to the south of Gourrock for 110 private

homes in an established residential area. It is effectively two sites to the east and west connected by a narrow strip of land which runs along the south side of Kirn Drive. The western portion of the site is open scrubland and has not previously been developed. The eastern part is former football playing fields, with the southern part of that site within the Burneven LNCS. The connecting strip is woodland on an upward slope from north to south, leading to an open area of scrubland.

68. Representations have raised a number of concerns, covering a wide range of issues. Some of the issues raised are not material to the planning system, including property values. As such matters are not material to the planning system, I have not taken them into account in reaching my conclusions in relation to the site at Kirn Drive.

69. In relation to traffic and traffic safety issues, I note from my site visit that Kirn Drive is a narrow two-way road, with unrestricted parking. Representations have raised concerns about the impact of additional on-street parking in the area and the potential impact of additional traffic in the area. The council has already begun to address this valid concern, and early meetings with the site promoter have concluded that Kirn Drive will need to be upgraded. The details of the proposed upgrading scheme and appropriate developer contributions will be included in a development brief to be prepared as part of Supplementary Guidance. Should any development proposal proceed, the potential impact on the road network and parking is a matter that would be fully assessed through the development management process and the required transport feasibility study. I am satisfied that the issue of traffic and parking arising from the development of this site could be managed through the application of both the policies of this plan and the appropriate standards.

70. The Local Transport Strategy addresses the overall traffic position in Gourock. In this examination we are limited to matters relating to potential impacts arising from the site itself.

71. At present, the details of the layout and design of any development at Kirn Drive are not known. I consider that it is clear from Policy 20- Residential Areas of this plan that proposals for development will be assessed with regard to the impact on amenity, character and appearance of the area. The impact on existing homes would have to be acceptable, including any potential impact on privacy, safety and amenity. There would be opportunities for participation in the development management process once a planning application is submitted and I am satisfied that this would be the most appropriate point in the planning process to consider such potential impacts.

72. The capacity of local amenities and services to cope with the additional 110 homes has been questioned in representations, including the capacity of schools, recreation facilities and healthcare providers. The council advises that no concerns were raised by the council services that were consulted during the plan preparation process. I am satisfied that should any need arise from the proposed development, then it could be addressed through the developer contribution mechanism during the development management process for assessing a planning application.

73. Concerns have been raised about the loss of greenspace. There would be a loss of a relatively small area of informal greenspace but I find that in the context of the overall area to the south of Kirn Drive, this would not be detrimental to those who use the area. The development brief would require an upgrade to the path between Earnhill Road and Kirn Drive, enhancing access to the open space.

74. Woodland Trust Scotland and Scottish Natural Heritage have both sought to minimise any potential impacts from development on the ancient woodland and the Burneven LNCS. The council has confirmed that the development brief for the site will specifically address potential impacts, required surveys and information, and any mitigation measures on the woodland network, habitats, the LNCS and the ancient woodland.

75. Policy 7 – Surface and Waste Water Drainage requires development proposals to demonstrate that both surface and waste water can be appropriately drained. I find that the development management process would be the appropriate place in the planning process to assess such issues and that the plan makes adequate provision for this assessment.

76. Overall, I am satisfied that the approach suggested by the council would resolve the issues raised in representations and I conclude that the inclusion of the site at Kirn Drive as a new housing development opportunity site for 110 homes is appropriate.

77. However, I note that the site at Schedule 4 does not have any mention of the development brief in the notes section. For completeness, I conclude that the plan should be amended to include a note in the final column of the entry for site R58 specifying that a development brief should be prepared for the site.

Reporter’s recommendations:

1. Modify Schedule 4 and the Proposals Map to identify the Arran Avenue, Park Farm site for 115 private houses. The site boundary should reflect the site identified on page 11 of the Development Framework submitted as part of the representation (283). The designation of the site as green belt on the proposals map should be removed
2. Modify Schedule 4 Site R62 with a note as follows: “Development Brief to be prepared”
3. Modify Schedule 4 Site R58 with a note as follows: “Development Brief to be prepared”

Issue 8	Housing Sites in the Renfrewshire Sub Housing Market Area	
Development plan reference:	Section 7.0 Our Homes and Communities, Pages 21-27	Reporter: David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Diane Jeavons (38) Peter Jeavons (44) Graham Keith (79) David Baker (80) Robin Lee (90) Edmund Graham (95) Graham Clark (96) John Patton (99) Mr & Mrs Hargreaves (100) John Anderson (101) Richard Creek (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 MacKay (282) James Wood (285) Liam McMillan (290) Ernest Cracknell (291) Mr & Mrs Burns (293) Wm Scaife (295) Margaret Scaife (298)</p>	<p>Michael Bowles (356) Kerry Taher (360) Sally McCulloch (361) Sandra Todd (362) Lesley McMillan (363) Colin Beckett (375) Gail Beckett (378) Jenny Cowan (386) Julie Ballantyne (387) Gladman Developments Ltd (394) Mactaggart & Mickel Homes Ltd (398) Mike Closier (400) Taylor Wimpey (Scotland West) Ltd (401) Helen Anderson (406) Andrew McLaughlin (408) Oliver Schofield (413) DM Land (415) Brian Cassidy (420) Irene McLaughlin (421) Lynne Knott (424) Fraser McAlister (425) Louise Welsh (427) Gayle McCarthy (430) W McCarthy (431) Margaret Cracknell (432) Carrie White (435) Davie White (446) Alison Winter (449) 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)</p>	

<p>Gabrielle McFarlane (316) Charles Mills (321) Tim Glanton (325) Colleen Wood (342) David Wood (344) Gill McColl (345) Peter Polet (349) Philip Craig (352) Fraser Craig (354)</p>	<p>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)</p>
<p>Provision of the development plan to which the issue relates:</p>	<p>Land for Housing (Policy 17), New Housing Development (Policy 18)</p>
<p>Planning authority's summary of the representation(s):</p>	
<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"> Support for West of Quarry Drive, Kilmacolm not being included in Plan. <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 & 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), Mairgreed McLundie (478), Jennifer McAdam (480), Zia Hotiana (482), Barry Swan (486), Andrew Bird (487), Betina Taher (488), Doreen Hyde (495)</u></p> <ul style="list-style-type: none"> 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; McNally Associates submission to Main Issues Report (RD8.1); 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 has 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 & 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 Police 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 (Document CD012), 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 (Document CD81). 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 (Document CD012), 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 (Document CD081). 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 (Document CD082).
- The Council’s assessment of the site is set out in the Proposed Development Site Assessment (Document CD012), based on the site promoted at the Main Issues Report stage. The site had been identified in the Main Issues Report (Document CD017) 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 (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 (Document CD014). 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. 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 (Document RD8.2) 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

(Document CD030) and 2004 (Document CD032). In the 2004 report, 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 (Document CD083).
- It is recommended to the Reporter that no modifications are made to the Plan in respect of this matter.

Planetreeyetts, 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. It is bound to the east by Finlaystone Road, to the south by Planetreeyetts farm buildings and the properties of Quarry Drive beyond, and to the north and west by open countryside.
- The Council’s assessment of the site is set out in the Proposed Development Site Assessment (Document CD012), 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 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 (Document CD014) 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' (Section 3.8). 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 (Document CD033). 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 (Document CD012).
- Two specific points relating the delivery of the site for development are commented on here:
 - The Council notes the different owners of the site support delivery of development upon it.
 - 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 (Document CD012), 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 (ie 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 (Document CD084) 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 (Document CD012), 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 (Document CD033). 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 (Document CD012) 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 Field 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 (Document CD033) and the 2014 Local Development Plan Examination (Document CD030). 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 (Document CD012) 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.

Reporter's conclusions:

Preliminary matter: The requirement to allocate land for housing development at Kilmacolm and Quarriers Village

1. The matters which are raised in the submitted representations and are addressed by the council above, all relate to specific sites in and around Kilmacolm and Quarriers Village which either have been allocated, or have not been allocated, for housing development in the proposed plan. I note that those suggesting that additional sites should be allocated, generally referred in their representations to there being a requirement to do so. They generally stated that this requirement derives from the provisions of the Clydeplan strategic development plan which identifies this part of Inverclyde as forming a very small part of the wider 'Renfrewshire housing sub-market area', which also extends across the whole of the area of Renfrewshire Council, and part of East Renfrewshire.

2. At Issue 5, I have addressed the question as to whether this plan is indeed required by Clydeplan to allocate additional housing land in and around Kilmacolm and Quarriers Village. I have concluded, for the reasons that I have set out there, that it is not so required.

3. This conclusion therefore informs my consideration of the matters raised in the representations concerning individual sites. I note that many of these representations appear to have been made on the basis of the different position which had previously been set out by the council in the course of the plan's preparation, and from which it has now departed, that there is a requirement to allocated further land to secure additional housing development here.

4. While I have found there is no requirement for additional housing sites to be allocated here, this would not preclude such allocations being made, if justified by other considerations. Benefits can be secured through new housing developments, and these can outweigh any adverse effects which may arise. This can occur on greenfield, as well as on brownfield, sites.

5. In preparing this plan, I note that the council undertook a very thorough and consistent assessment of the implications likely to arise from new housing development on each of the sites which had been suggested earlier, at the stage of the Main Issues Report. Many of these are still the subject of the representations referred to above, although some sites are now reduced in their extent. I find that this assessment (at core document CD12) has provided a sound basis for assessing their individual and comparative merits. However, I have also considered the representations made by those suggesting that sites should be allocated, to identify whether there are particular circumstances or benefits which would justify doing so; and I have also taken account of the arguments of those supporting the non-allocation of these sites in the proposed plan.

Carsemeadow, Quarriers Village

6. The site now being proposed for inclusion in the plan is the northern part of the larger site which was originally suggested to the council and assessed by it. I consider that the site has certain characteristics which would make it suitable for development. Although currently in agricultural use, it makes a limited contribution to the key objectives of the green belt. Development here would consolidate the main part of the village with the adjacent residential area around Laurel Way, which is surprisingly not shown as a residential area on the proposals map.

7. In these circumstances, I do not consider that it would represent a significant intrusion into the open countryside. The council's assessment of the site's natural heritage value indicates that this principally relates to its boundary trees and vegetation, which could be taken into account in the detailed design in order to avoid development having a substantially negative impact. However, the site also occupies an elevated position which makes it prominent, and successful integration with the existing village would depend heavily on the development's layout, landscaping and quality of design.

8. Detailed technical and environmental investigations have also been undertaken by those proposing the site's allocation. There appear to be no significant constraints which would prevent its development, although additional pressure would be placed on the village's sub-standard road network, and the findings of a flood risk assessment would need to inform the development. Although it is not at present under the control of a house-builder, I am satisfied that this is a site which would be capable of becoming effective and delivering house completions during the plan period.

9. However the village offers minimal facilities (a café, a florist and a playing field) and is relatively isolated, particularly for those dependent on public transport due to its limited

bus services. While its development could secure a proportion of affordable or social needs houses, I consider that its relative isolation makes this a generally inappropriate location for them. I find that Quarriers Village is a less sustainable location compared to Kilmacolm, or to the main settlements either of Inverclyde or of the Renfrewshire housing sub-market area. These are key considerations which are also reflected in the many representations made by local people. I have also found that this site's development for housing would not afford other significant benefits which might justify allocating it in the absence of a confirmed requirement for additional housing land.

West of Quarry Drive, Kilmacolm

10. In its assessment of all the suggested sites, the council found that this greenfield land on the north-west edge of Kilmacolm would be the most appropriate to allocate for housing land. However, its allocation was not included in the proposed plan, and I have now found that there is not a requirement for additional land to be allocated for housing development in the Kilmacolm and Quarriers Village area at this time.

11. The use of brownfield land is generally to be preferred, but there are circumstances in which the development of some greenfield sites such as this can be necessary, and where some impact on the amenity of those currently living on the outer edge of settlements may be inevitable.

12. This site lies between the houses that form a ribbon extending the village out along the Port Glasgow Road to the west, and the houses on Springwood Drive and the houses and garages at the end of Quarry Drive to the east. I am satisfied that a robust new edge to the settlement could be achieved in conjunction with its development, and thus be regarded as consolidating or rounding off the boundary of Kilmacolm. However, I also find that this rising site does retain its rural character and continues to make a positive contribution to the setting of the village. The site adjoins an area to the north-east which has now been designated as a local nature conservation site. However, subject to this area being safeguarded in the detailed layout and design, the proposed development is unlikely to result in unacceptable ecological impacts.

13. Some additional affordable housing would be secured, and the residents of any new houses built here would enjoy good access to the varied facilities of Kilmacolm. As the site is under the control of a house-builder and there appear to be no infrastructure constraints or other restrictions which would prevent its development, I am satisfied that this is a site which is capable of becoming effective and delivering house completions within the plan period.

14. However, in the circumstances where I have concluded that there is not a requirement to allocate additional land for housing in Kilmacolm, I have not identified any further benefits of a type or scale which would nonetheless justify allocating this greenfield site for development at this time.

The Knapps, Kilmacolm

15. This greenfield site lies at the south-eastern edge of Kilmacolm. It occupies a generally square shaped, largely open field, bounded by the A761 Bridge of Weir road, and by a vehicular lane which extends along the boundaries of some large detached houses that occupy very large plots. This lane also forms the boundary of the conservation area, of which these houses comprise part. There is a thick belt of pine

trees on the site's eastern edge, but its southern boundary is open. The site rises to the north-east, from the A761. This makes it particularly prominent to those approaching Kilmacolm along the main access road, despite the presence of the houses on Gryffe Road, which stand to the west, across the A761.

16. The site is at present part of the green belt, which here makes a significant contribution to the setting of Kilmacolm. Knapps Loch lies to the south, and contributes to the amenity of the green belt in this area. Development here would also impact to some degree on the setting of the loch.

17. The council's assessments of this site for this plan, and separately in relation to a recent planning application, confirm that, subject to detailed consideration, there are no infrastructure or other environmental constraints that would be likely to preclude a satisfactory development being undertaken here. While the site is not at present under the control of a house-builder, there is little doubt that there would be a market for new houses in this location. I am therefore satisfied that this is a site which would be capable of becoming effective, and could deliver house completions during the plan period.

18. A small number of the suggested 12 houses could also be secured for affordable housing. It is on the main road to Bridge of Weir and the Glasgow conurbation, and is served by public transport. There are bus stops adjacent to the site on either side of the road. Being some 1.3 kilometres from the village centre, there is also good access to the facilities of Kilmacolm, via the existing roadside footway.

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

North Denniston, Kilmacolm

20. This irregularly shaped site mainly comprises grazing fields and lies west of the A761 Bridge of Weir road. It also includes the area of the former farm buildings of North Denniston that is now occupied by three very large houses. It is bounded by the access road to them, to the south; by the A761, to the west; by the rear boundaries of the large houses on the south-west side of Gryffe Road, to the north-east; by the embankment of the former railway line to the west, which is now a footpath and cycleway; and by an artificial sports pitch to the north.

21. The rolling topography and former railway embankment to the south would serve to limit the impact that development here would have on the setting of Kilmacolm when approaching on the A761, or when viewed from the B788 road to the south. There would be a substantial impact on users of the footpath and cycleway on the former railway line, due to the presence of houses on the adjoining lower land that at present affords a rural setting for, and open views to, the built-up edge of the village. While occupiers of houses on Gryffe Road would also experience a substantially changed outlook, their residential amenity should not otherwise be significantly affected.

22. This site forms one of the 'fingers' of countryside that extend towards the centre of Kilmacolm and are considered to be part of Kilmacolm's character. Its development would erode that character and, to that extent, its setting. I do not consider that its

development would result in a significantly stronger settlement boundary.

23. Detailed assessments undertaken of the proposed development of this site have not identified any other significant environmental or ecological impacts that are likely to occur. No infrastructure or other practical constraints have been identified that would prevent its development. Although the site is not at present under the control of a house-builder, given the level of market interest in housing development within Kilmacolm, I have no reason to doubt that the site would be capable of delivering new house completions within the plan period. I am therefore satisfied that the site is capable of becoming effective.

24. Its development would enable 25% of the houses to be used for affordable housing. The current access to the A761 is some 1.3 kilometres from the village centre, and there are bus stops close to this junction. There may also be the opportunity to provide additional pedestrian accesses to Gryffe Road and/or to the former railway footpath, which would significantly improve accessibility to most of Kilmacolm's facilities.

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

Planetreeyetts, Kilmacolm

26. This large greenfield site is on the northern edge of Kilmacolm. It lies on the west side of Finlaystone Road. It extends from the rear of the houses on the north side of Quarry Drive, and the nearby farm buildings, to beyond the present edge of the built up area on the east side of Finlaystone Road.

27. The site forms rising land at the upper edge of the village. It comprises prominent open farmland that I consider provides an important part of the setting of Kilmacolm. The settlement boundary here is not inappropriate at present. I find that development on the northern half of the site would represent a particularly significant extension of the built-up area into open countryside.

28. Part of the site towards its south-west edge has been identified as comprising valuable wetland habitat. This now forms part of a new local nature conservation site which has been identified on the proposals map, and is therefore now protected under Policy 33. However this would not preclude the development of housing elsewhere on the site, subject to adequate safeguards.

29. Development of this site would require the widening of Finlaystone Road, particularly along its northern edge where it is of single track width. Potential flooding issues would also have to be addressed, but otherwise I have not identified other infrastructure or technical constraints which would preclude its development.

30. Being mainly within one kilometre of the centre of Kilmacolm, residents here would enjoy good access to the facilities and amenities of the village. Application of Policy 18 would ensure that 25% of the total number of houses would be for affordable housing. The land is under the control of a major house-building company, and I am satisfied that the site is capable of becoming effective and delivering house completions within the plan period.

31. Overall, I do not consider that allocating this greenfield site for housing development in this plan would be justified, particularly in light of my conclusion at Issue 5, that there is no requirement at this time for any additional land to be allocated in the Kilmacolm and Quarriers Village part of Inverclyde.

Port Glasgow Road, Kilmacolm (The Plots)

32. A separate representation (from Rosemary Hammond) relating to this small greenfield site has been dealt with by the council at Issue 4, and my conclusions can be found there. I found that the site should not be excluded from the green belt and, accordingly, that no amendment to the plan was required.

33. The additional arguments raised by the representation here relate principally to need and deliverability. I find that there are no physical or infrastructure constraints which would preclude the site's development for housing, subject to potential flooding issues related to the burn which flows through the site being addressed. I also accept that its development for individual plots could help to widen the range and type of site which is available, both in Kilmacolm and more generally in Inverclyde.

34. Being some 400 metres from the centre of the village, and on a radial route which carries bus services to and from Port Glasgow and beyond, the residents of any houses built here would have good access both to the facilities and amenities of Kilmacolm, and also of the other nearby towns. Due to its small size, any contribution to the provision of affordable housing here is likely to be very limited.

35. While the site is not currently under the control of a house-building company, I am satisfied that there is likely to be demand for new plots or houses here. I therefore find that the site could be treated as capable of being effective, as it is likely that house completions could be delivered here within the plan period.

36. Nonetheless, both in the light of my conclusions in relation to this site's inclusion within the green belt, and as I have found that the allocation of additional land for housing development is not at present required in the Kilmacolm and Quarriers Village area of Inverclyde, I conclude that this site should not be allocated for housing development in this plan.

West Glen Road, Kilmacolm

37. This is a large greenfield site adjoining the upper, north-west edge of Kilmacolm. It lies on the south-east side of West Glen Road. The site extends beyond the limit of existing residential development on the opposite side of the road. It is partly screened by two linear tree belts alongside the road, but comprises open fields which form part of the rural setting of the village. The existing settlement boundary here is not inappropriate or weak.

38. While the Glen Moss site of special scientific interest lies close by, to the south, the site is not in itself of high ecological value. However its development would represent a significant extension of the village into an area of countryside that contributes positively to Kilmacolm's setting.

39. Areas of potential flooding would require to be addressed, but there appear to be no infrastructure or technical constraints that would preclude its development. It is some

750 metres from the centre of Kilmacolm, although roadside footways along West Glen Road do not extend all the way to the site and it is not served by public transport. With these caveats, there would be good access to the facilities and amenities of the village.

40. The application of Policy 18 would ensure that 25% of the houses that are built here would be for affordable housing, although the representation indicates that 30% would be made available for that purpose, together with attractive landscaping and public open space. However, I have not identified any other significant benefits which would arise from developing this greenfield site. In the current circumstances, where I have found that the release of additional housing land in the Kilmacolm and Quarriers Village part of Inverclyde is not required, I conclude that an amendment to the plan in order to allocate this site for housing development would not be justified.

The Police Station Field, Kilmacolm

41. This large elongated greenfield site forms one of the fingers of the present green belt which is considered to contribute to the character of Kilmacolm. It lies on the western side of the former railway line that now forms a footpath and cycleway leading out from the centre of the village at Lochwinnoch Road. The site extends as far as the Gryfe Water, beyond the southern edge of the village.

42. It generally comprises open fields on its eastern side, while its western side is a wooded area, known as Milton Wood. A private driveway leading south through this woodland from Lochwinnoch Road provides a public footpath, which is a core path.

43. The proposed housing development, as illustrated in a submission which accompanied the representation, would be focused on the currently open area, with footpath connections to the core path. However it would encroach within the local nature conservation site which covers both the woodland and the area of water-side habitat on either side of the Gryfe Water.

44. The development proposed on this site is therefore likely to have a direct impact on the local nature conservation site, as well as the indirect pressures which arise from the occupiers of properties which adjoin mature woodland.

45. In addition, the site forms part of the designed landscape of Duchal House, which forms part of Scotland's 'Inventory of Gardens and Designed Landscapes'. There is already a substantial residential area to the west of the woodland, and I consider that further development immediately on its eastern side would detract from its integrity and its contribution to Kilmacolm's setting. The value of the footpath to its users is enhanced by the woodland being bordered by open grazing fields, rather than by being overlooked and abutted by residential properties.

46. However the development of housing on this site would have a much more limited impact on walkers and cyclists using the path along the line of the former railway. This is because, for most of the length of the site, the path is in a steep cutting, from which the houses would not be visible.

47. While a flood risk assessment would have to be undertaken before planning permission could be granted, I am not aware of any infrastructure or technical constraints which would preclude houses being built within the area suggested. Being so close to the village centre, the site would afford good accessibility to its services and facilities, and the

application of Policy 18 would ensure that 25% of the houses on this greenfield site would be for affordable housing.

48. The site is being proposed by a major house-building company and, given that this is an area of strong market demand, I am satisfied that this site is capable of becoming effective, with new house completions being delivered within the period of this plan.

49. However I have not identified particular benefits which would arise from its development that might outweigh the adverse environmental effects which could occur, even if a robust woodland management plan is implemented. Given my finding at Issue 5 that there is not a requirement for additional sites for housing development to be released in the Kilmacolm and Quarriers Village area of Inverclyde, I conclude that the plan should not be amended in order to allocate this site for that purpose.

The ARP Field, Kilmacolm

50. This large greenfield site lies on the western side of Kilmacolm. It is on the north-west side of Lochwinnoch Road, and south-west of the Gryfe Water. It forms part of the open countryside immediately beyond the edge of the built-up area of Kilmacolm which, here, is marked by the bridge which carries Lochwinnoch Road across the Gryfe Water. The site boundary extends as far as the B788 Greenock to Bridge of Weir road, and it comprises open fields on rising land. I find that this site comprises part of the rural area which provides an attractive setting for the village of Kilmacolm.

51. The representation suggests that development within the site would be restricted to the lower part which is close the Gryfe Water. Tree planting on the southern edge of the development would be undertaken to create a clear edge to the extended settlement. However I consider that the Gryfe Water already provides a clear and robust boundary to the settlement.

52. While the agricultural fields do not in themselves have a high ecological value, part of the development site is now included within a local nature conservation site which straddles the river. This is likely to restrict the area that is suitable for development, but there may also be an indirect impact as a result of houses being occupied in close proximity to such a site.

53. The council's assessment has highlighted that a flood risk assessment would be required, and the feasibility of securing a sewer connection would also need to be confirmed before the development could be designed and any planning permission granted. I am not aware of other technical or infrastructure issues which might preclude its development.

54. With interest in this site from a major house-builder, I consider that it is capable of becoming effective, as it is likely that house completions could be delivered before the end of the plan period in 2029. However, in the present circumstances where I have found that it is not necessary to augment the housing land supply in the Kilmacolm and Quarriers Village area, I conclude that it would not be appropriate to amend this plan to allocate this greenfield site for housing development.

Smithy Brae, Kilmacolm

55. This site (ref. R65) is identified in the plan as a housing development opportunity site

with an indicative capacity of 42 houses. It lies on the north side of the village centre, and comprises both a brownfield site which has become overgrown, and an element of greenfield land which was previously removed from the green belt. It has previously been granted planning permission for new housing. It is also already identified as a housing development opportunity site in the existing local development plan, following detailed consideration through the examination of that plan. The housing land audit also reflects the council's view that housing completions will be delivered on this site before the end of the plan period.

56. This plan gives strong preference to the re-development of brownfield sites within settlement boundaries. In this case, any housing development would also bring the added benefit of securing the remediation of currently contaminated land. No significant change in circumstances relating to this site has been drawn to my attention which would justify removing it from this plan.

Leperstone Avenue, Kilmacolm

57. This small greenfield site lies towards the northern edge of Kilmacolm. The site is within the settlement boundary, and is already identified as a housing development opportunity site in the existing local development plan. The council has confirmed that it is to be developed as individual house plots. To that end, a planning permission for the formation of service plots has already been implemented, and a specific planning permission for one of the houses has now been granted.

58. The representations relate to the type of houses to be built on this site, rather than to its use for housing. The role of housing allocations in local development plans is to deal with the principle of whether a site is to be developed for housing, and an indication is generally given of the number of houses which are expected to be built on it. However, the specific details of the number, type and design of the houses are addressed when a planning application is submitted to the council for planning permission. That has already occurred in relation to this site, and with planning permission now granted and partly implemented, I conclude that there is no justification for now amending the provisions of this plan in relation to this site.

Reporter's recommendations:

None.

Issue 9	Our Homes and Communities - other	
Development plan reference:	Section 7.0, Pages 21-27	Reporter: David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>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)</p>		
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):		
<p><u>Scottish Environment Protection Agency (93)</u></p> <ul style="list-style-type: none"> • Comments provided on individual sites. • Note that the requirements for flood risk assessment are not mentioned in Schedules 3 & 4 and there is no explicit link to the Development Sites Assessment where this information would be expected to be found. • Cemetery proposals must be considered in line with SEPA guidance. • 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. <p><u>Stuart McMillan MP (286)</u></p> <ul style="list-style-type: none"> • 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. <p><u>Inverclyde Health and Social Care Partnership (294)</u></p> <ul style="list-style-type: none"> • The current Local Housing Strategy stipulates that 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 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 will be 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 not 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.

Reporter's conclusions:

Preliminary matters

1. My examination of the plan is limited by regulations to addressing only the unresolved issues which have been raised in representations. The council has listed above a number of matters raised in representations which are in support of the provisions of the plan, or which simply make comments and do not seek modifications to the plan. Therefore, unless these relate to an issue which is unresolved, they will not be addressed in my conclusions.

2. The concerns referred to above by Woodland Trust Scotland, regarding unsympathetic development adjacent to or directly impacting ancient woodland, relate principally to Policy 34, and are therefore addressed at Issue 13.

Targets for wheelchair accessible housing

3. The council has confirmed that its local housing strategy requires 3% of all new build social housing to meet wheelchair accessible standards. The plan also encourages 'particular needs' housing, but does not specify numbers, types of housing, or sites and locations. The 'needs' which require to be accommodated are individual to the person and their circumstances, and can change over time. Aids and adaptations to people's current house can play an important role, although this is not always sufficient, and the scope for the private sector to respond to demand from those who can afford a new house is inevitably limited.

4. I agree that the inclusion of a policy within the plan in relation to the provision of housing designed for those with particular needs would be desirable. However it is apparent from the council's response and from the supporting documents that the necessary evidence and analysis has not yet been identified or undertaken to enable a robust and practical policy to be incorporated at this stage.

Policy 21 'Community Facilities'

5. I find that it is clear from the supporting text at paragraph 7.9 that the use of the term 'community facilities' incorporates education facilities. Policies in a local development plan are intended to guide change, rather than to give recognition or status to a particular institution, such as West College Scotland. However, there is an intention to relocate the college facilities within Greenock at an early date. While a new location has not yet been agreed, in response to an enquiry from me, the council has confirmed its support in principle for such a development. I therefore consider that it would be appropriate that this is reflected in the plan, by making reference to it as one of the opportunities listed in schedule 5, which will be supported under the terms of Policy 21.

6. I agree that it could be counter-productive to amend the policy by trying to list all of the types of community facilities to which it will apply. This could result in the loss of support

or protection for useful or desirable facilities which have not been specified.

7. I also consider that the wording of the policy which specifies that “proposals that would result in the loss of a community facility will need to demonstrate that the facility is no longer required for the existing or an alternative community use” is appropriate. Evidence of marketing of the property may be relevant, but specifying a minimum timescale within which a facility has been marketed would be arbitrary and potentially counter-productive.

Flood risk assessments

8. I note that the action programme will identify the need for a flood risk assessment to be undertaken in relation to those housing sites listed in schedules 3 and 4. In these circumstances I am satisfied that it is not necessary for this information to be specified in the plan as well.

Kibble development at Quarriers Village

9. A representation has been received stating that this development is not suitable for Quarriers Village. However, the plan contains no reference to such a development. Accordingly it is not necessary or appropriate to amend the plan in this respect.

Reporter’s recommendations:

1. Modify schedule 5 of the plan, by adding “New West College Scotland Campus” as an additional ‘Proposed facility’ at a location “To be identified”.

Issue 10	Our Town and Local Centres	
Development plan reference:	Section 8.0, Pages 28-31	Reporters: Sinéad Lynch David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>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)</p>		
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):		
<p><u>Lunar Greenock S.a.r.l. (29)</u></p> <ul style="list-style-type: none"> • 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. • 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. • 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. • 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 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 2-6 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)

- Object 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 (sic, 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 any such development 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:

- The Council should 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 Port Glasgow town centre boundary. (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)

- Change the wording of Policy 22 to read:
 “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)
- Amend the eastern boundary of Greenock town centre to include the East India Dock part of the Harbours site. (494)
- Amend schedule 8 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 (Document CD037) (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 Scottish Planning Policy (Document CD035). 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 Scottish Planning Policy within Policy 22, as it is felt that the sequential approach is clearly set out already in Scottish Planning Policy 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. While the Council notes concern about the impact of development at this site on property values, it does not consider this a material consideration in relation to whether the site should be identified for development in the Local Development Plan. 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 be relocated 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, and is not a matter that could be specified in the Local Development Plan. 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:

Preliminary matter

1. My examination of the plan is limited by regulations to addressing only the unresolved issues which have been raised in representations. The council has listed above a number of matters raised in representations which are in support of the provisions of the plan, or which simply make comments and do not seek modifications to the plan. Therefore, unless these relate to an issue which is unresolved, they will not be addressed in my conclusions. This includes the representation by James Dick, which has been responded to above by the council.

Policy 22: 'Network of centres strategy'

2. The Inverclyde local development plan requires to be consistent with the Clydeplan strategic development plan. It identifies Greenock town centre as a strategic centre, which forms part of a network of such centres across the city region. It is the only strategic centre in Inverclyde. Policy 4 of Clydeplan seeks to protect and enhance the development of the network of strategic centres. Among the challenges facing Greenock town centre it identifies the effects of declining population, the quality of the environment and the need to strengthen its retail role in the face of changing shopping habits and patterns. In terms of future actions, it refers to improving both the public realm and the retail offer, including the complementary role of Port Glasgow.
3. The approach taken in the local development plan in relation to Greenock town centre is broadly consistent with its identification as a strategic centre. The approach set out in Policy 22 and schedules 6 and 7 is also consistent with the requirement to protect and enhance its development within the network of strategic centres, while also recognising the complementary role of Port Glasgow town centre.
4. The plan continues to identify a central area within Greenock town centre. Schedule 7 confirms that the central area is the preferred location for the largest retail developments of over 1,000 square metres. Within the town centre's central area the plan also defines a retail core area, which is now reduced in its extent. I consider that these are appropriate responses to the current challenges in seeking to protect the key retail function of the town centre, and reflects its role as the strategic centre of Inverclyde.
5. Neither Port Glasgow nor Gourock town centres are strategic centres, but are both confirmed in schedule 7 as the second preferred location for new retail developments of over 1,000 square metres, as well as being preferred locations for the wide range of other town centre uses identified in Schedule 6. This approach is supportive of both town centres and consistent with their roles within the overall network of centres in Inverclyde.
6. I am also satisfied that this policy is consistent with the 'sequential approach' set out at paragraph 68 of Scottish Planning Policy. However it would be inappropriate to assume that all those that might have an interest in its application or implications are familiar with it. I therefore conclude that the supporting text at paragraph 8.6 should be amended to provide a cross-reference to it.

Greenock town centre

7. I am satisfied that the local development plan is consistent with the strategic development plan in recognising the role of Greenock town centre as a strategic centre for the whole of Inverclyde, and the complementary role which Port Glasgow town centre performs, along with other in the network within Inverclyde.
8. I do not consider that the plan threatens the pre-eminent role of Greenock town centre for retailing by supporting the successful re-development of the 'priority places', such as The Harbours and James Watt Dock/Garvel Island, even if these may involve elements of retail, catering, tourism and leisure to support their new functions. The regeneration of these areas will attract additional residents and visitors to the area, and provide important additional support for the town centre's vitality and viability in the long term.
9. Policies 22 and 23 would have the effect of removing some restrictions in Greenock

town centre, by reducing the extent of the retail core area, and by permitting additional uses to locate within the town centre. If the council is persuaded to introduce a simplified planning zone within the town centre in future, that can be secured through separate procedures from the local development plan. The use of planning conditions can assist in protecting the amenity of both retailers and residents, and it is the function of development management procedures to consider the specific circumstances of individual proposals, and their potential impacts, when deciding on planning applications.

10. 'The Harbours' in Greenock is one of the plan's 'priority places'. Policy 3 therefore supports its comprehensive re-development. Schedule 2 sets out the preferred strategy for a mixed use development which could include a number of uses that can also be found in town centres. The site contains two harbours, East India and, to the east of it, Victoria, together with surrounding vacant land. It adjoins the boundary of the town centre on its western edge, while the A8 dual carriageway also separates the land on the south side of the East India Harbour from the town centre.

11. The site does not currently perform a town centre function, and I have no evidence that it did so in the past. It clearly represents a major development opportunity and has the potential to enhance the image and prosperity of Inverclyde. With the effects of long term population decline and the major recent changes in shopping behaviour, the priority appears to be to consolidate and re-invigorate the existing town centre rather than to expand it. However, given its proximity to the existing town centre, I am satisfied that the comprehensive re-development of The Harbours which is currently proposed would help to enhance the overall vitality and viability of the existing town centre. I am therefore satisfied the boundary of Greenock town centre as delineated in the plan is appropriate, and that no amendment is required.

Other site specific matters

12. I find that the small site at 2-6 Ardgowan Street, Port Glasgow adjoins the existing retail park, as it already shares a boundary with the rear of one of its retail stores. It is not directly adjacent to a residential area. In this position, I agree that residential development of the site would be inappropriate, and that its exclusion from the town centre boundary appears to be anomalous. Given the site's location and relationship with the retail park, I consider that any development on it would most likely be ancillary to the retail park, and unlikely to threaten the vitality and viability of Port Glasgow's traditional town centre. Accordingly I agree that the 'town centre' boundary of the retail park should be amended to incorporate this site.

13. The vacant church at 15 Nelson Street is situated within Greenock town centre, but it is not within the retail core area which is identified at Figure 4 of the plan. In these circumstances its identification as an opportunity site (C1) does not require it to be re-developed or used for retail purposes. A wider range of uses that are set out in schedule 6 can be supported in town centres, subject to the requirements of Policy 22. These can help to improve the overall vitality and viability of the town centre. The vacant church is not a listed building, but uses may be proposed which retain it as a feature of the town centre. I therefore conclude that its identification as one of the opportunity sites in schedule 8 of the plan is appropriate.

14. The land at Union Street, Greenock is identified in schedule 4 as an opportunity site for housing development with an indicative capacity of some 60 houses of mixed tenure. It is detached from the town centre, and contains semi-derelict and redundant buildings

which perform no positive town centre function at present. However its proximity to Ocean Terminal does provide the potential for its re-development, perhaps associated to some extent with the growth of cruise ships berthing there, which gives passengers the opportunity to sail up the Firth of Clyde and gain ready access to many of the major attractions of Scotland. Direct benefits for Greenock town centre may be limited. Given the reduced extent of its retail core, and the recognition of the decline in traditional shopping activity, I conclude that it would be inappropriate to extend the area covered by the town centre designation so as to incorporate the site at Union Street.

15. I also note that the representation does not seek the removal of the site's inclusion as an opportunity for residential development, albeit that this would be part of a mixed use development. Nor has it been argued that the indicative capacity of 60 houses is inappropriate.

16. It also appears to me that the flexibility being sought in the plan is already provided. Schedule 1 identifies Greenock Ocean terminal as a priority project, and Policy 2 provides support in principle for development proposals associated with it. It appears to me that neither that, nor the plan's policies relating to housing development, would preclude mixed use proposals which contain appropriate elements of commercial and retail use being found to be acceptable on this site, without threatening the vitality and viability of the traditional town centre.

17. I conclude therefore that an amendment to the plan is not required.

Additional matter

18. In the course of the examination the council confirmed that, in the column entitled 'Role and function' within Schedule 7 of the plan, there are references to "Schedule 7 uses", and that these should refer instead to "Schedule 6 uses". This is a matter for the council to rectify.

Reporter's recommendations:

1. In paragraph 8.6, after the third sentence, insert the following additional sentence:

"This is consistent with the 'sequential approach' set out in paragraph 68 of Scottish Planning Policy."

2. Modify the 'town centre' boundary to incorporate the site at 2-6 Ardgowan Street, Port Glasgow.

Issue 11	Our Jobs and Businesses	
Development plan reference:	Section 9.0, Pages 32-34	Reporters: Sinéad Lynch David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Stephen Johnston (53) Scottish Environment Protection Agency (SEPA) (93) Robert Buirds (152) Stuart McMillan MSP (286) Peel Land and Property (351) Wilson Dunlop (359) OCO Westend (397) Scottish Government (411) Crucible Development (Scotland) Ltd (423) Woodland Trust Scotland (460) Scottish Natural Heritage (SNH) (484) West College Scotland (494) Jane Conway (552) David Wilson (560)</p>		
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):		
<p><u>Stephen Johnston (53)</u></p> <ul style="list-style-type: none"> • 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. <p><u>Scottish Environment Protection Agency (SEPA) (93)</u></p> <ul style="list-style-type: none"> • 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. • 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. <p><u>Robert Buirds (152), Wilson Dunlop (359)</u></p> <ul style="list-style-type: none"> • The LDP lacks vision and ambition regarding industry and has no clear industrial strategy to encourage new industrial development in Inverclyde. 		

Stuart McMillan MSP (286)

- 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.

Peel Land and Property (351)

- Support the identification of the site at Inchgreen (E7) (see map provided in representation) 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.

OCO Westend (397), 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 Cartsydyke 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.

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 should 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 (Document CD085), which was jointly prepared by Inverclyde Council and Riverside Inverclyde (Urban Regeneration Company). 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 (Document CD035) 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 (Document CD086) provides the framework for tourism growth in the area, setting out a vision, mission and three delivery themes. A Tourism Inverclyde Action Plan (Document CD087) 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 (Document CD035), 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 Scottish Planning Policy (Document CD035) 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 E12 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) (Document CD088)
- Change designation of land at Pottery Street, Greenock from (a) to (d) (Document CD088)
- Change designation of land at Greenock Ocean Terminal from (a) to (c) (Document CD089)

Reporter's conclusions:

Preliminary matters

1. My examination of the plan is limited by regulations to addressing only the unresolved issues which have been raised in representations. The council has listed above a number of matters raised in representations which are in support of the provisions of the plan, or which simply make comments and do not seek modifications to the plan. Therefore, unless these relate to an issue which is unresolved, they will not be addressed in my conclusions.

2. Where the council has identified mapping errors in its proposals map, and these have not been raised in representations, that is a matter for the council to deal with separately.

3. Matters identified as being dealt with by the council under a different issue will be examined there.

Vision and strategy

4. Within Scotland, it is the National Planning Framework and Scottish Planning Policy that set out the national vision of how the planning system can contribute to the Scottish Government's aim of sustainable economic development. It is the role of strategic development plans to set out the vision and strategy for their area, and Clydeplan has done so for its area, which includes Inverclyde. The local development plan has to be consistent with Clydeplan, and take account of the National Planning Framework. It also has to be integrated with other statutory plans and strategies affecting the development and use of land.

5. In relation to aspects of economic development, I am satisfied that this plan is consistent with these requirements, and that its policies and its proposals to secure the land needed to support different sectors of the economy, including tourism and the service sector, as well as industrial development, will contribute to delivery. It is also consistent with the Inverclyde Economic Development & Regeneration Single Operating Plan 2016-2019.

6. I note that no specific modifications have been sought which might improve the local development plan's effectiveness in this respect. I therefore conclude that no amendments are required.

Home-working, live-work units, micro-businesses and community hubs

7. Scottish Planning Policy confirms that plans should encourage opportunities for home-

working, live-work units, micro-businesses and community hubs. As the local development plan is silent on this subject, I therefore consider that this should be rectified. This can best be addressed by amending paragraph 7.8 to indicate support for such proposals in residential areas, subject to there being no unacceptable impacts, which is consistent with Policy 20.

Tourism development

8. I note that the tourism strategy for Inverclyde has already been prepared and approved separately, together with an action plan. I consider that it is appropriate in these circumstances for the local development plan to play a supporting role. I am satisfied that it achieves this through its policies (principally Policies 3, 25 and 27), as well as by safeguarding existing tourist facilities, including a major cruise liner terminal, and providing the flexibility to support new proposals in appropriate locations.

9. I consider that the plan provides appropriate protection for features of the natural heritage, and this does not require to be specifically referenced in the policy relating to tourism development. Similarly, the role of the natural heritage in increasing the area's attractiveness both to visitors and to residents is already acknowledged, and the need to protect it for its intrinsic value is reflected in other policies of the plan. These aims are not always aligned, as increasing some people's enjoyment of, and access to, sensitive elements of the natural heritage may not be wholly compatible with their protection and enhancement. There may also be tourism facilities which would not contribute either to the enjoyment of the natural environment, or of access to it, but could nonetheless be supported.

10. I am also satisfied that Policy 27 provides an appropriate framework for considering any proposals which require planning permission and would involve use of the River Clyde for tourism related activities and facilities.

11. With regard to the concern expressed about the vulnerability to flooding of caravan and camp-sites, I am satisfied that the provisions of Policy 8 'Managing flood risk' provide appropriate protection during the consideration of new development proposals, and do not require to be replicated in Policy 27.

12. I note that the term 'green network' is defined in the plan's glossary. I therefore do not consider it necessary to alter the reference to it in Policy 27.

13. I therefore conclude that the provisions of Policy 27 in relation to tourism development are appropriate and sufficient. Accordingly, I find that no amendments to it are required.

Efficient energy and waste innovations within business environments

14. There are some policies in the plan which promote energy efficient technologies within new development. However the plan does not encourage opportunities for integrating efficient energy and waste innovations within business environments. In this respect I find that it is inconsistent with Scottish Planning Policy, and conclude that Policy 7 and its supporting text should be amended to provide that encouragement.

Minerals extraction

15. The council has now confirmed that it is unaware of any workable mineral resources being present within Inverclyde. Therefore I consider that it would be inappropriate to modify the plan to include a policy to safeguard non-existent resources. However I find that it would be helpful, and therefore appropriate, for the relevant text at paragraph 9.9 to be amended to clarify this position.

Flood Risk

16. Policy 8 of the plan provides safeguards against the approval of development proposals which might be at risk of flooding, or might cause increased flood risk elsewhere. However I consider that it is important that potential developers are made aware in advance of those sites for which a flood risk assessment will be required. On the basis of the council's assurance that it will amend the action programme to ensure that this requirement is highlighted for all development opportunity sites where this applies, I am satisfied that this information does not require to be included within the plan itself. The action programme cannot be amended by this examination, and this will be a matter for the council to address separately.

Site E3 (at Newark Street, Port Glasgow)

17. The Woodland Trust Scotland has requested that the wooded areas bordering Site E3 in Port Glasgow be allocated in the plan as high-quality green space. At my site visit, I observed that this site is adjacent to a supermarket to the north, to established business and industrial uses to the east and south-east, and to wooded open space to the west and south-west.

18. The land to the west and south-west is allocated as open space on the proposals map, to which Policy 35 'Open Spaces and Outdoor Sports Facilities' applies. Any development proposals that come forward for Site E3 would also fall to be assessed under Policy 36 'Delivering Green Infrastructure through New Development'. I am satisfied that the land bordering Site E3 is correctly identified as open space in the plan and is sufficiently safeguarded through Policies 35 and 36. I conclude that an amendment to the plan is not required.

Site E9 (at Main Street, Greenock)

19. A representation has raised concerns about the potential impact on residential amenity should Site E9 be developed for industrial purposes. This site at Main Street, Greenock is allocated for Class 4 'Business' use. This class permits the following uses: "(a) as an office, other than a use within class 2 (financial, professional and other services); (b) for research and development of products or processes; or (c) for any industrial process; being a use which can be carried on in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit."

20. Any development proposal would be assessed against the relevant provisions of the plan, in particular Policy 1 'Creating Successful Places' which addresses residential amenity by requiring that: "In preparing development proposals, consideration must be given to the factors set out in Figure 3". Figure 3 states that proposals should "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.”.

21. I am satisfied that the site’s allocation for Class 4 ‘Business’ use would limit the potential for development that is not compatible with residential use, and that any potential impact on residential amenity from a specific proposal can be properly addressed through the development management process. The impact of development on property value was also raised, but I consider that is not a material consideration in planning matters. I therefore conclude that an amendment to the plan is not required.

Site E12 (at Ingleston Street, Greenock)

22. The Woodland Trust Scotland has requested that a tree survey should be carried out at Site E12 at Ingleston Street in Greenock, prior to any development taking place. The council agrees and has suggested that protected species surveys should also be carried out as part of any future planning application.

23. At my site visit, I noted the dense tree cover on the northern part of Site E12 which appears to be naturally generated. The general area is characterised by established industrial uses with residential to the north and east. I am satisfied that the retention of trees or habitats would be beneficial to the area and support the council’s suggestion that the required actions for Site E12 in the action programme should be expanded to include a tree survey and a protected species survey.

24. However such amendments to the action programme are a matter which requires to be addressed separately by the council, as it is beyond the scope of this examination, which is restricted to the provisions of the proposed local development plan itself. In these circumstances, I am satisfied that an amendment to the plan is not required.

Reporter’s recommendations:

1. Modify paragraph 7.8 by adding the following sentence: “Proposals for the development or use of premises for home-working, live-work units, micro-businesses and community hubs will also be supported, subject to there being no unacceptable impacts.”

2. Modify paragraph 4.11 by adding to the final sentence: “....., and encouraging opportunities for integrating efficient energy and waste innovations within business environments.”

3. Modify Policy 7 by adding the following sentence to the final paragraph: “Opportunities for integrating efficient energy and waste innovations within business environments will be encouraged.”

4. Modify paragraph 9.9 by adding to the first sentence: “..., and the council is unaware of any workable mineral resource being present within its area.”

Issue 12	Our Historic Buildings and Places	
Development plan reference:	Section 10, Policies 28 - 32	Reporter: David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Scottish Environment Protection Agency (SEPA) (93) Scottish Government (411) Historic Environment Scotland (HES) (426) Kilmacolm Community Council (443) Jane Conway (552)</p>		
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):		
<p><u>Scottish Environment Protection Agency (SEPA) (93)</u></p> <ul style="list-style-type: none"> It is expected that any proposals should be considered in line with SEPA's development management guidance. <p><u>Scottish Government (411)</u></p> <ul style="list-style-type: none"> 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. <p><u>Historic Environment Scotland (HES) (426)</u></p> <ul style="list-style-type: none"> 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. Policy 31 (Scheduled Monuments and Archaeological Sites) does not refer to adverse impact on the setting of the Scheduled Monument. Policy 28 (Conservation Areas) does not provide a clear management framework for the demolition of unlisted buildings in conservation areas. Policy 29 (Listed Buildings) does not provide a clear framework by which demolition cases can be assessed. Welcome removal of external policy and guidance from the LDP policies Welcome the spatial strategy to capitalise on, and protect the historic environment. <p><u>Kilmacolm Community Council (443)</u></p> <ul style="list-style-type: none"> 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 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 (Document CD035). 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:

Preliminary matter

1. My examination of the plan is limited by regulations to addressing only the unresolved issues which have been raised in representations. The council has listed above a number of matters raised in representations which are in support of the provisions of the plan, or which simply make comments and do not seek modifications to the plan. Therefore, unless these relate to an issue which is unresolved, they will not be addressed in my conclusions.

Policy 28 ‘Conservation Areas’

2. I agree that this policy, unlike the policy in the existing local development plan, lacks clarity for potential applicants who are contemplating a proposal to demolish an un-listed building in a conservation area, particularly if they have not formulated a replacement proposal. Accordingly, I find that it would be appropriate to amend the proposed wording.

Policy 29 ‘Listed buildings’

3. I agree that it would be appropriate for Policy 29 to provide a framework for assessing proposals for the demolition of listed buildings. There can be circumstances where this is either necessary or desirable, and it would be inappropriate to state as policy that all such proposals would not be supported. I conclude therefore that the wording of the proposed policy should be amended.

Policy 31 ‘Scheduled Monuments and Archaeological Sites’

4. I consider that this policy should address the potential for development proposals to

have an impact on the setting of a scheduled monument, as well as those that could directly affect the monument itself. This would be consistent with paragraph 145 of Scottish Planning Policy. Accordingly, I conclude that it would be appropriate to amend the wording of Policy 31 to include this.

Protection of the coastline and views in Gourrock

5. The plan does not contain a specific policy to protect the coast and historic views of Gourrock. However the plan does set out a sustainable development strategy that recognises distinctiveness as one of the six qualities that help create a successful place. Figure 3 identifies factors which contribute to Inverclyde’s distinctiveness as including its urban form, its historic buildings and places, its important views and its natural features. Paragraph 3.3 confirms that the council will have regard to all of the qualities when considering all development proposals. I consider these provisions of the plan to be appropriate and sufficient, and conclude that the introduction of a specific policy to protect the coast and historic views of Gourrock is not required.

Reporter’s recommendations:

1. Modify Policy 28 ‘Conservation Areas’ by:

- In the first sentence, after “Proposals for development” deleting “..., including demolition,...”; and,
- After the second sentence, adding: “Where the demolition of an unlisted building is proposed, consideration will be given to the contribution the building makes to the character and appearance of the conservation area. If such a building makes a positive contribution to the area, there will be a presumption in favour of retaining it. Proposals for demolition will not be supported in the absence of a planning application for a replacement development that preserves or enhances the character and appearance of the conservation area.”

2. Modify Policy 29 ‘Listed Buildings’ by replacing the final sentence with: “Demolition of a listed building will not be permitted unless the building is no longer of special interest; it is clearly incapable of repair; or there are overriding environmental or economic reasons in support of its demolition. Applicants should also demonstrate that every reasonable effort has been made to secure the future of the building.”

3. Modify the first sentence of Policy 31 ‘Scheduled Monuments and Archaeological Sites’ by inserting “or the integrity of its setting” after “Scheduled Monument”.

Issue 13	Our Natural and Open Spaces	
Development plan reference:	Section 11.0, Pages 38-43	Reporters: Sinéad Lynch David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>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)</p>		
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):		
<p><u>Victor Canata (5)</u></p> <ul style="list-style-type: none"> 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. <p><u>sportscotland (9)</u></p> <ul style="list-style-type: none"> Support the wording of Policy 35, which reflects SPP's provision on outdoor sports facilities. 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. <p><u>Forestry Commission Scotland (31)</u></p> <ul style="list-style-type: none"> 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 Muirshiel 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 Muirshiel 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 Gourock, 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 the representation. (491)
- Add the new paths installed by Clyde Muirshiel Regional Park (shown in green on the representation map) to the Core Paths Plan (491)
- 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. (491)
- Would like to see a commitment to undertaking an audit of open space of recreational value, particularly in Gourock, 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, 16/0319/IC (Document CD090). 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 (Document CD091).

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 Open Space Audit 2015 (Document CD092) on those spaces identified in the current Local Development Plan 2014 (Document CD030). 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 Muirshiel Regional Park (484)

- It is considered that the policy, by having regard to the Clyde Muirshiel Regional Park Strategy (Document CD093), 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 the 2015 Scotland National Marine Plan (Document CD094). 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 (Document CD014). 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 the Council 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, 2015 (Document CD096) 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 (Document CD097) 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.

Reporter's conclusions:

Preliminary matter

1. My examination of the plan is limited by regulations to addressing only the unresolved issues which have been raised in representations. The council has listed above a number of matters raised in representations which are in support of the provisions of the plan, or which simply make comments and do not seek modifications to the plan. Therefore, unless these relate to an issue which is unresolved, they will not be addressed in my conclusions.

Policy 33 'Biodiversity and Geodiversity'

2. I do not consider that one of the roles of the local development plan is to refer to the presence of particular species at specific locations. Rather it should guide development to locations where the impact on biodiversity would be either negligible or acceptable. It should also provide enhanced protection for sites that have been designated due to their particular value for bio-diversity, or where protected species are present, while also minimising the impact on wildlife from the development of non-designated sites. I note that the council separately intends to publish an environmental constraints map, which will include native woodlands which are not the subject of specific designations.

3. I consider that Policy 33 provides a suitable framework for wildlife protection, and I am satisfied that it would not be appropriate to amend it to refer to the presence of particular species at individual locations which are not the subject of designations. Neither would it be appropriate to require all developments to further the conservation of biodiversity, as many of the forms of development that are the subject of planning applications would have little or no impact on biodiversity. I consider that the existing wording is both appropriate and sufficient, in stating that, where possible, new development should be designed to conserve and enhance biodiversity. I am also satisfied that the identification of designated sites on the proposals map is consistent with the requirements of Scottish Planning Policy.

4. As far as it relates to Natura 2000 sites, the policy confirms the three criteria to be applied before permitting a proposal or development where an assessment has not demonstrated that there will be no adverse effect on the integrity of the site. These criteria are identified as alternatives which would enable consent to be granted, whereas it is a requirement of European and domestic law that all three criteria would have to be met. In addition, the planning authority is required to notify the Scottish Ministers of its decision. I conclude, therefore, that the wording of Policy 33 requires to be amended to be consistent with the legal requirements in relation to Natura 2000 sites.

5. In relation to legally protected species, I consider that it would be appropriate to amend the wording of the policy to provide greater clarity both for those proposing a development, and for those subsequently considering a planning application. This would be preferable to focusing solely on the tests of a separate licensing regime. As set out in Scottish Planning Policy, I consider that the policy should set out requirements: to establish whether a protected species is present; to identify how the protected species may be affected by the development; to ensure that the development is planned and designed so as to avoid or minimise any such impact, while having regard to the degree of protection which is afforded by legislation, including any separate licensing requirements; and to demonstrate that it is likely that any necessary licence would be granted.

6. With regard to the designation of local nature conservation sites, I note that the council commissioned an independent ecological assessment of several sites around Kilmacolm and Quarriers Village as part of the preparation of this plan. As a result of that detailed assessment a number of new areas are now designated in the plan due to the value of the nature conservation interest which was identified. The extent of some existing sites has also been extended.

7. Both Planetreeyetts and Quarry Drive were surveyed as part of this investigation. They adjoin each other on the north-west edge of Kilmacolm. The survey concluded that parts of each site, also adjoining each other, would together represent a block of high nature conservation value. The proposals map designates a new local nature conservation site at that location, but it does not extend across the whole of the two areas. In these circumstances, I am satisfied that the local nature conservation site has been appropriately identified and designated, and I do not consider that any amendment to the plan is required in this respect.

8. In relation to local landscape areas, I agree that their protection would be assisted by a requirement on developers to undertake a landscape and visual impact assessment where there is the potential for a development proposal to have a significant landscape and/or visual impact. I also consider that this would be more effective as part of the policy, rather than within the supporting text.

Policy 34 'Trees, Woodland and Forestry'

9. I consider that the references in the plan to the proposed supplementary guidance on development affecting trees are sufficient, as they are included at paragraphs 1.3 and 11.13, as well as Policy 34. However the intention for that guidance to address potential issues relating to ancient woodland should be explicit.

10. Potential impacts on ancient woodlands do not only arise from developments that are authorised through the planning system. The Scottish Government has published a

separate policy on ‘Control of woodland removal’ which seeks to provide direction for all relevant decisions within its competence. Reference to this policy is made at paragraph 11.11 of the plan, and I consider that to be appropriate.

11. I find that it would not be appropriate for the council to prepare a forestry strategy. This is to be prepared by the Clydeplan authority as supplementary guidance associated with the Policy 13 of the approved strategic development plan. Paragraph 8.12 of that plan confirms that this will cover the whole of the city region, and so would include Inverclyde.

12. I am satisfied that the statement of the council’s support for the retention of trees that are covered by tree preservation orders, or are of significant amenity or other value, is appropriate. The criteria set out in the policy are to be applied where their removal is proposed as part of a planning application. Requests relating to the removal or control of trees which are within a conservation area or are the subject of a tree preservation order would be dealt with under different, specific legislative provisions. Decisions would require to take account of all relevant considerations, including any significant loss of amenity which is being caused by them. If the council intends to make a tree preservation order, it is required to allow affected parties to make representations, and to consider those representations. In these circumstances, I conclude that it is not necessary to amend the plan.

Policy 36 ‘Delivering Green Infrastructure through New Development’

13. I find that there is already a sufficient ‘hook’ in the plan in relation to the supplementary guidance which the council intends to prepare to give further detail and guidance on delivering green infrastructure through new development. It is named at paragraph 1.3, explained at paragraph 11.20, and referred to in this policy. I conclude that no amendment is required.

14. I note that definition of ‘green infrastructure’ that is set out in this plan’s glossary is more restricted than the definition in the glossary of Scottish Planning Policy, which includes reference to trees and hedges, as well as other features. I consider that it would be more appropriate and avoid potential confusion if this plan adopted the same glossary definition, and that this should be reflected in an amendment to the supporting text.

Policy 37 ‘Clyde Muirshiel Regional Park’

15. The recreational resource provided by the regional park is highlighted in paragraph 11.2 of the plan, and the supporting text for this policy refers to the more detailed objectives that are set out in the park’s current strategy. However these do not focus wholly on the provision of recreational access to the countryside, and I consider that it would be appropriate also to make reference to this, which is the park’s statutory purpose, within the policy.

Policy 38 ‘Path network’

16. Any addition or extension to the network of core paths in Inverclyde has to be made through a review of the council’s core paths plan. That plan is separate from the local development plan. While this plan’s ‘proposals map’ does show Inverclyde’s network of core paths established by the core paths plan, these core paths are not in fact ‘proposals’ of the local development plan. However they are the subject of Policy 38, which seeks to

prevent the loss of core paths as a result of development, unless acceptable alternative provision can be made. It is therefore appropriate for them to be shown on the proposals map, and I therefore conclude that no amendment to the plan is required.

Policy 39 Water Environment

17. Local development plans are required to be consistent both with the national marine plan, and with the regional marine plan. The decisions made by planning authorities on developments which may affect the marine environment are required to be taken in accordance with the national and regional marine plans, unless there are material considerations which indicate otherwise. Given its position on the Firth of Clyde, this is particularly important for Inverclyde. I consider that this should be reflected both in the policy, and in the supporting text.

18. The council recognises that this policy should ensure that, where development takes place near a watercourse, appropriately sized buffer strips should be provided between the development and the watercourse. I agree that this would be appropriate, and consider that the policy should be amended accordingly.

Dunvegan Avenue, Gourock

19. A representation advises that a site in Dunvegan Avenue in Gourock has been incorrectly designated both as open space and as a local nature conservation site on the proposals map, as planning permission has been granted for the erection of a house with gardens. From my site visit, I note that the house is now under construction.

20. The council agrees that the developed part of the site should be removed from the open space and Local Nature Conservation Site designation and identified as residential. A plan (CD091) has been provided by the council which illustrates the necessary correction to the proposals map. I agree that, in these circumstances, this amendment to the proposals map would be appropriate.

Reporter’s recommendations:

1. Modify Policy 33 in relation to its provisions for Natura 2000 sites by:

- Inserting the word “and” after criterion a);
- Replacing the word “or” at the end of criterion b), with the word “and”; and,
- Inserting the following sentence at the end: “In such cases, the Scottish Ministers must be notified.”

2. Modify Policy 33 in relation to its provisions for protected species by replacing the text with:

“When proposing any development which may affect a protect species, the applicant should fulfil the following requirements: to establish whether a protected species is present; to identify how the protected species may be affected by the development; to ensure that the development is planned and designed so as to avoid or minimise any such impact, while having regard to the degree of protection which is afforded by legislation, including any separate licensing requirements; and to demonstrate that it is likely that any necessary licence would be granted.”

3. Modify Policy 33 in relation to its provisions for local landscape areas by adding:

“Where there is potential for development to result in a significant adverse landscape and/or visual impact, proposals should be informed by a landscape and visual impact assessment.”

4. Modify Policy 34 by replacing the second sentence in the second paragraph with:

“This will also cover the protection of ancient woodlands and the management and protection of existing and new trees during and after the construction phase.”

5. Modify the glossary’s definition of ‘green infrastructure’ to read:

“Includes the ‘green’ and ‘blue’ (water environment) features of the natural and built environments that can provide benefits without being connected.

Green features include parks, woodlands, trees, play spaces, allotments, community growing spaces, outdoor sports facilities, churchyards and cemeteries, swales, hedges, verges and gardens.

Blue features include rivers, lochs, wetlands, canals, other water courses, ponds, coastal and marine areas including beaches, porous paving and sustainable urban drainage systems.”

6. Modify the first sentence of paragraph 11.19 by replacing “The term ‘green infrastructure’ is held by this Plan to refer to ...”, with “The full definition of ‘green infrastructure’ is set out in the glossary, and includes ...”.

7. Modify Policy 37 by adding at the end of the text: “ , and to the Park’s statutory purpose of providing recreational access to the countryside.”

8. Modify Policy 39 by adding the following at the start of criterion a): “supporting the strategies and actions of the national and regional marine plans, and

9. Modify Policy 39 by adding the following to the start of criterion f): “providing appropriately sized buffer strips between development and watercourses, in line with SEPA guidance, and”.

10. Add a new paragraph 11.30, to read: “This plan also seeks to be consistent with Scotland’s National Marine Plan which was approved in 2015, and with the forthcoming Clyde Regional Marine Plan.”

11. Modify the proposals map as it relates to land at Dunvegan Avenue, Gourrock (as shown on the map submitted by the council as core document CD091) by removing its designation both as part of the open space and as part of the local nature conservation site, and including it within the area designated as residential.

Issue 14	General, Proposals Map and Non-notifiable modifications	
Development plan reference:	Various	Reporters: Sinéad Lynch David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>David Nish (56) Health and Safety Executive (57) Network Rail (288) Inverclyde Health and Social Care Partnership (294) Euan Darroch (301) Margaret Swan (302) Deborah Gilmour (305) Anne Marie Meldrum (311) Angus Meldrum (313) Sandy Meldrum (319) Peel Land and Property (343) Scottish Water (358) Stuart Lang (384) Bill Crookston (389) Hilary Darroch (391) Donald Miller (393) Erica Kerr (433) Valerie Crookston (434) Christina Burns (439) Brian Adamson (441) Laura Adamson (444) Woodland Trust Scotland (460) Anne Louise Tait (470) Scottish Natural Heritage (484) Karen Tolan (555) Strathclyde Partnership for Transport (556) Councillor Christopher Curley (559)</p>		
Provision of the development plan to which the issue relates:	Various	
Planning authority's summary of the representation(s):		
<p><u>David Nish (56), Erica Kerr (433)</u></p> <ul style="list-style-type: none"> • Support the Plan's approach as it relates to Kilmacolm <p><u>Health and Safety Executive (57)</u></p> <ul style="list-style-type: none"> • There are HSE licensed explosive sites in Inverclyde which have safeguarding consultation zones. Consultation with HSE is required for development within safeguarding zones. 		

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), Christina Burns (439), Brian Adamson (441), Laura Adamson (444), Anne Louise Tait (470), Karen Tolan (555)

- Support the LDP

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 (see location maps in representation).

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.
- 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.

Councillor 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 includinglandscape, 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 (Document CD010) 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 (Document CD010). 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 the Business and Industrial development opportunity E8 Sinclair Street and the existing business and industrial area immediately to the east (25a), i.e. ‘Riverside Business Park’. The narrow strip of land in between these areas has been identified as residential, which continues eastwards along the northern side of the railway line. This land should be identified as an existing business and industrial area under Policy 25, and the Council is not opposed to the proposals Map being adjusted as per Document CD098.

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:Preliminary matters

1. My examination of the plan is limited by regulations to addressing only the unresolved issues which have been raised in representations. The council has listed above a number of matters raised in representations which are in support of the provisions of the plan, or which simply make comments and do not seek modifications to the plan. Therefore, unless these relate to an issue which is unresolved, they will not be addressed in my conclusions.
2. Minor corrections to the text of the plan are a matter for the council, while matters dealt with by the council under a different issue will be examined there.

The aim of the local development plan

3. I note that the council considers that the aim of the plan, which is set out at paragraph 1.2, already encompasses the 'environmental pillar' of sustainability. However I do not agree, as its particular focus is on encouraging investment and new development which is sustainably designed and located, and omits any reference to protecting or enhancing the natural environment of Inverclyde. This fails to acknowledge or reflect that there are specific policies set out in section 11 of the plan, relating to natural and open spaces, which do seek to protect and enhance the natural environment. I therefore conclude that the wording of the plan's aim, at paragraph 1.2, should be amended to make this explicit.

Sustainable development strategy/spatial development strategy

4. In Figure 1, I consider it arguable that the reference to environmental protection and enhancement should be listed more appropriately under sustainable development strategy, rather than spatial development strategy. However, I consider the reference there to be sufficient for the purposes of the plan. However the detailed wording relating to 'Our natural and open spaces' would more accurately reflect the relevant policies of the plan by including reference to landscape protection. I therefore conclude that the wording in Figure 1 should be amended to reflect this.

Changes to the proposals map

5. In the absence of other justification for doing so, I do not consider it appropriate to define a precise boundary between areas of proposed private and affordable housing at James Watt Dock/Garvel Island. In a representation made on behalf of Taylor Wimpey (West Scotland) Ltd, it was indicated that River Clyde Homes has secured £127 million to finance the development of 1,000 homes for social renting, and the council has confirmed

that future affordable housing may be delivered on land currently intended for the development of private sector homes. I consider that retaining flexibility may assist in securing the delivery of development on such large scale, important brownfield sites.

6. The council has confirmed that the narrow strip of land lying to the east of the business and industrial development opportunity site (E8) at Sinclair Street, Greenock, and then extending alongside the railway line, should not have been identified as residential land. Rather, it should have formed part of the adjacent Riverside Business Park which is identified as an existing business and industrial area under Policy 25. I therefore conclude that the proposals map should be amended accordingly, as shown by the council in its submitted core document CD098.

HSE consultation

7. While the Health and Safety Executive has confirmed that there are licensed explosive sites in Inverclyde which have safeguarding consultation zones. The council has confirmed that it is its established practice to consult the Health and Safety Executive to be consulted on development proposals these zones. I note that the Health and Safety Executive did not seek any modification to be made to the plan, and that the council has confirmed that it is aware of its consultation requirements in relation to development proposals with these safeguarding zones. I am therefore satisfied that this matter does not constitute an unresolved issue which might lead to any modification to the plan being required.

Accessibility

8. The council has confirmed that references in the plan to the ‘accessibility’ of a site have been made in relation to its general accessibility by walking, cycling, public transport and private car, rather than relating specifically to people with disabilities. I note both that this reflects the definition of ‘accessibility’ contained in the plan’s glossary, and that the representation did not seek any amendment to the plan. In these circumstances, I conclude that no modification is required.

Reporter’s recommendations:

1. Modify paragraph 1.2 by adding at the end of the first sentence: “.... , and by protecting and enhancing the natural environment of Inverclyde.”
2. Modify Figure 1, by amending the wording under “Our natural and open spaces’ to insert “landscape,” after “... biodiversity,”.
3. Modify the proposals map, as shown in core document CD098, to include within Riverside Business Park under Policy 25, the narrow strip of land lying to the east of the business and industrial development opportunity site (E8) at Sinclair Street, Greenock, and then extending alongside the railway line, which is currently identified as residential land.