

**Agenda Item
No. 2b**

Report To: The Planning Board

Date: 6th August 2025

Report By: Interim Director - Regeneration

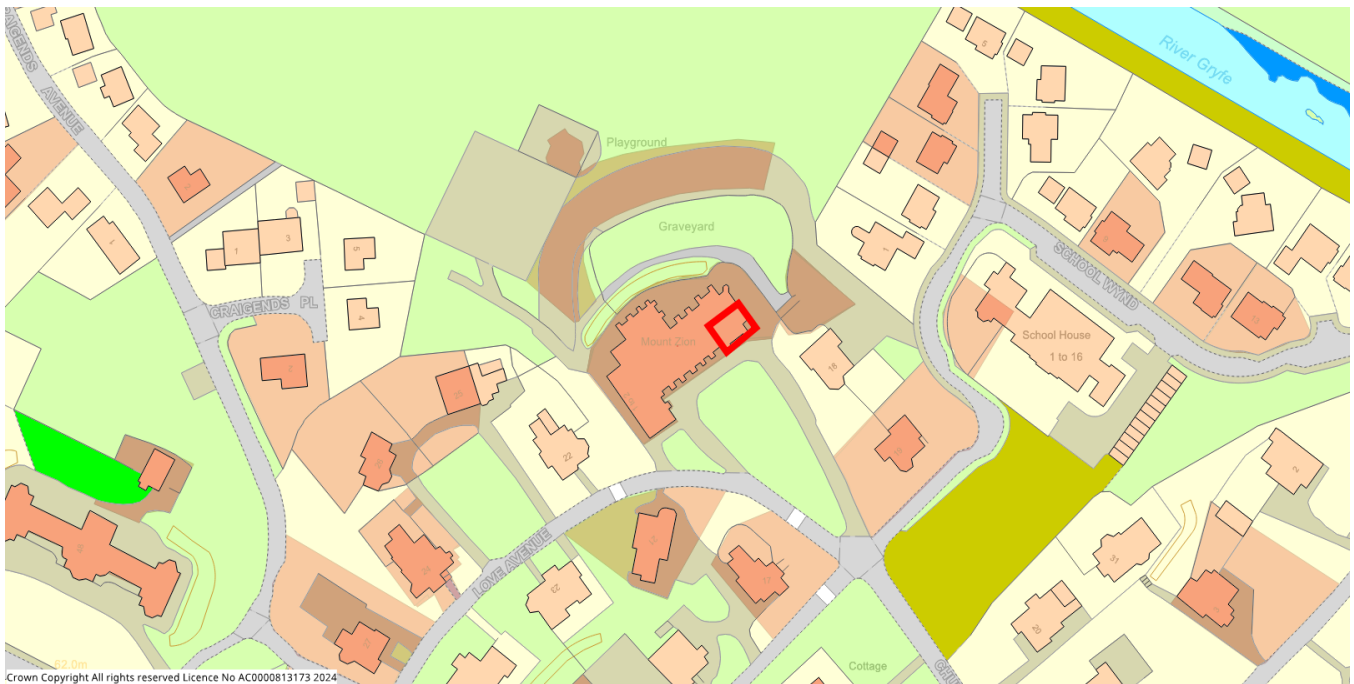
Report No: 25/0081/IC

**Local Application
Development**

**Contact
Officer: Carrie Main**

Contact No: 01475 712413

**Proposal: Change of use of flat to short term let at
Flat Ground 1, 2 Mount Zion, Church Road,
Quarriers Village**



SUMMARY

- The proposal is acceptable when assessed against National Planning Framework 4 (NPF4).
- The proposal accords with the adopted and proposed Inverclyde Local Development Plans.
- There have been 13 representations objecting to the application.
- The recommendation is to GRANT PLANNING PERMISSION subject to conditions.

Drawings may be viewed at: [25/0081/IC | Change of use of flat to short term let | GROUND 1 2 MOUNT ZION Church Road Quarriers Village PA11 3TD](#)

SITE DESCRIPTION

The site relates to a flatted property within the Category B Listed Former Mount Zion Church, located within the Quarriers Homes Conservation Area. The building is of traditional sandstone construction, built in 1888, with a pitched roof and clock tower. The flat is accessed via the eastern side of the building, is over three storeys and contains two bedrooms. The building contains a tarmacked driveway with shared parking. The surrounding area is mainly residential in character.

PROPOSAL

Planning permission is sought for the use of the property for short term let. The applicant has advised that the property will be available to rent all year round with a 2-night minimum duration with the preference being 7 nights plus. It will be available for a maximum of 4 guests within its 2 bedrooms. No physical internal or external alterations are proposed within the application. The occupancy will be managed by the owner or through an agency.

NATIONAL PLANNING FRAMEWORK 4

NPF4 was adopted by the Scottish Ministers on 13th February 2023. NPF4 forms part of the statutory development plan, along with the Inverclyde Local Development Plan and its supplementary guidance. NPF4 supersedes National Planning Framework 3 (NPF3) and Scottish Planning Policy (SPP) (2014). NPF3 and SPP no longer represent Scottish Ministers' planning policy. The Clydeplan Strategic Development Plan and associated supplementary guidance cease to have effect from 13th February 2023 and as such no longer form part of the development plan.

NPF4 contains 33 policies, and the following are considered relevant to this application.

Policy 1 - Tackling the climate and nature crisis

When considering all development proposals significant weight will be given to the global climate and nature crises.

Policy 2 - Climate mitigation and adaptation

- a) Development proposals will be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible.
- b) Development proposals will be sited and designed to adapt to current and future risks from climate change.
- c) Development proposals to retrofit measures to existing developments that reduce emissions or support adaptation to climate change will be supported.

Policy 7- Historic assets and places

- a) Development proposals with a potentially significant impact on historic assets or places will be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place. The assessment should identify the likely visual or physical impact of any proposals for change, including cumulative effects and provide a sound basis for managing the impacts of change.

Proposals should also be informed by national policy and guidance on managing change in the historic environment, and information held within Historic Environment Records.

- c) Development proposals for the reuse, alteration or extension of a listed building will only be supported where they will preserve its character, special architectural or historic interest and setting.

Development proposals affecting the setting of a listed building should preserve its character, and its special architectural or historic interest.

d) Development proposals in or affecting conservation areas will only be supported where the character and appearance of the conservation area and its setting is preserved or enhanced. Relevant considerations include the:

- i. architectural and historic character of the area;
- ii. existing density, built form and layout; and
- iii. context and siting, quality of design and suitable materials.

e) Development proposals in conservation areas will ensure that existing natural and built features which contribute to the character of the conservation area and its setting, including structures, boundary walls, railings, trees and hedges, are retained.

Policy 14 - Design, quality and place

a) Development proposals will be designed to improve the quality of an area whether in urban or rural locations and regardless of scale.

b) Development proposals will be supported where they are consistent with the six qualities of successful places:

Healthy: Supporting the prioritisation of women's safety and improving physical and mental health.

Pleasant: Supporting attractive natural and built spaces.

Connected: Supporting well connected networks that make moving around easy and reduce car dependency.

Distinctive: Supporting attention to detail of local architectural styles and natural landscapes to be interpreted, literally or creatively, into designs to reinforce identity.

Sustainable: Supporting the efficient use of resources that will allow people to live, play, work and stay in their area, ensuring climate resilience, and integrating nature positive, biodiversity solutions.

Adaptable: Supporting commitment to investing in the long-term value of buildings, streets and spaces by allowing for flexibility so that they can be changed quickly to accommodate different uses as well as maintained over time.

Further details on delivering the six qualities of successful places are set out in Annex D.

c) Development proposals that are poorly designed, detrimental to the amenity of the surrounding area or inconsistent with the six qualities of successful places, will not be supported.

Policy 30 - Tourism

b) Proposals for tourism related development will take into account:

- i. The contribution made to the local economy;
- ii. Compatibility with the surrounding area in terms of the nature and scale of the activity and impacts of increased visitors;
- iii. Impacts on communities, for example by hindering the provision of homes and services for local people;
- iv. Opportunities for sustainable travel and appropriate management of parking and traffic generation and scope for sustaining public transport services particularly in rural areas;
- v. Accessibility for disabled people;
- vi. Measures taken to minimise carbon emissions;
- vii. Opportunities to provide access to the natural environment.

e) Development proposals for the reuse of existing buildings for short term holiday letting will not be supported where the proposal will result in:

- i. An unacceptable impact on local amenity or the character of a neighbourhood or area; or
- ii. The loss of residential accommodation where such loss is not outweighed by demonstrable local economic benefits.

ADOPTED 2019 LOCAL DEVELOPMENT PLAN POLICIES

Policy 1 - Creating Successful Places

Inverclyde Council requires all development to have regard to the six qualities of successful places. In preparing development proposals, consideration must be given to the factors set out in Figure 3. Where relevant, applications will also be assessed against the Planning Application Advice Notes Supplementary Guidance.

Policy 10 - Promoting Sustainable and Active Travel

Development proposals, proportionate to their scale and proposed use, are required to:

- a 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; and
- b include electric vehicle charging infrastructure, having regard to the Energy Supplementary Guidance.

Proposals for development, which the Council considers will generate significant travel demand, are required to be accompanied by a travel plan demonstrating how travel to and from the site by means other than private car will be achieved and encouraged. Such development should also demonstrate that it can be accessed by public transport.

The Council will support the implementation of transport and active travel schemes as set out in Council-approved strategies, subject to adequate mitigation of the impact of the scheme on: development opportunities; the amenity and operations of existing and adjacent uses; the green network; and historic buildings and places.

Policy 11 - Managing Impact of Development on the Transport Network

Development proposals should not have an adverse impact on the efficient operation of the transport and active travel network. Development should comply with the Council's roads development guidelines and parking standards. Developers are required to provide or contribute to improvements to the transport network that are necessary as a result of the proposed development.

Policy 27 - Tourism Development

Proposals for change of use of tourism related facilities will only be supported where it can be demonstrated that they are no longer viable as a business in their current use. Development of tourism related facilities will be supported in appropriate locations where:

- a) it avoids adverse impact on the amenity and operation of existing and adjacent uses;
- b) major trip-generating proposals can be travelled to by sustainable modes of transport; and
- c) it is appropriately sited and designed for its location and avoids significant adverse impact on the green network and historic buildings and places.

Policy 28 – Conservation Areas

Proposals for development, within or affecting the setting of a conservation area, are to preserve or enhance the character and appearance of the area. In assessing such proposals regard will be had

to any relevant Conservation Area Appraisals or other information relating to the historic or architectural value of the conservation area. 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.

Policy 29 – Listed Buildings

Proposals for development affecting a listed building, including its setting, are required to protect its special architectural or historical interest. In assessing proposals, due consideration will be given to how the proposals will enable the building to remain in active use.

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.

Inverclyde Council Planning Policy Supplementary Guidance – ‘Short Term Lets’

PROPOSED 2021 LOCAL DEVELOPMENT PLAN POLICIES

Policy 1 - Creating Successful Places

Inverclyde Council requires all development to have regard to the six qualities of successful places. In preparing and assessing development proposals, consideration must be given to the factors set out in Figure 2 and demonstrated in a design-led approach. Where relevant, applications will also be assessed against the Planning Application Advice Notes and Design Guidance for New Residential Development Supplementary Guidance. When assessing proposals for the development opportunities identified by this Plan, regard will also be had to the mitigation and enhancement measures set out in the Strategic Environmental Assessment Environmental Report.

Policy 11 - Promoting Sustainable and Active Travel

Development proposals, proportionate to their scale and proposed use, are required to:

- provide safe and convenient opportunities for walking and cycling access within the site and, where practicable, including links to the wider walking, cycling network and public transport network; and
- include electric vehicle charging infrastructure, having regard to the Energy Supplementary Guidance.

Proposals for development, which the Council considers will generate significant travel demand, are required to be accompanied by a travel plan demonstrating how travel to and from the site by means other than private car will be achieved and encouraged. Such development should also demonstrate that it can be accessed by public transport.

The Council will support the implementation of transport and active travel schemes as set out in national, regional and Council-approved strategies, subject to adequate mitigation of the impact of the scheme on: development opportunities; the amenity and operations of existing and adjacent uses; and the resources protected by the Plan's historic buildings and places and natural and open spaces chapters

Policy 12 - Managing Impact of Development on the Transport Network

Development proposals should not have an adverse impact on the efficient operation of the transport and active travel network.

Development should comply with the Council's roads development guidelines and parking standards, including cycle parking standards.

Developers are required to provide or financially contribute to improvements to the transport network that are necessary as a result of the proposed development.

Policy 20 - Residential Areas

Proposals for development within residential areas will be assessed with regard to their impact on the amenity, character and appearance of the area. Where relevant, assessment will include reference to the Council's Planning Application Advice Notes Supplementary Guidance.

Policy 27 - Tourism Development

Proposals for change of use of tourism related facilities will only be supported where it can be demonstrated that they are no longer viable as a business in their current use. Development of tourism related facilities will be supported in appropriate locations where:

- a) it avoids adverse impact on the amenity and operation of existing and adjacent uses;
- b) major trip-generating proposals can be travelled to by sustainable modes of transport; and
- c) it is appropriately sited and designed for its location and avoids significant adverse impact on the resources protected by the Plan's historic buildings and places, and natural and open spaces chapters.

Policy 28 – Conservation Areas

Proposals for development, within or affecting the setting of a conservation area, are to preserve or enhance the character and appearance of the area. In assessing such proposals regard will be had to any relevant Conservation Area Appraisals or other information relating to the historic or architectural value of the conservation area.

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. Applicants should demonstrate that every reasonable effort has been made to secure the future of the building. 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.

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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.

Inverclyde Council Planning Policy Supplementary Guidance – ‘Short Term Lets’

CONSULTATIONS

Head of Service - Roads and Transportation –

If the number of bedrooms in the final proposed property is the same or less than currently, then no additional parking is required.

PUBLICITY

An advertisement was placed in the Greenock Telegraph on 23rd May 2025 due to development affecting a conservation area and a listed building.

SITE NOTICES

A site notice was posted on 23rd May 2025 due to the development affecting a conservation area and a listed building.

PUBLIC PARTICIPATION

The application was the subject of neighbour notification, and 13 representations have been received objecting to the proposal including from individuals and two community groups, Kilmacolm and Quarriers Village Community Council and Kilmacolm Civic Trust.

The comments received are summarised below:

Residential amenity and impact on the conservation area and listed building

- A money-making investment at the detriment of the peace and quiet currently experienced by residents.
- Increased noise and disturbance from transient and high turnover residents.
- Soundproofing between flats is not great so disturbance potential.
- Wear and tear of shared communal spaces.
- Potential for disrespect of the building and anti-social behaviour.
- This would set a precedent for short term lets in the building/area.
- Other local authorities' guidance is appropriate i.e. only houses or main door flats can be considered for short term let to minimise disturbance of neighbouring properties.
- A key safe being fitted would not be appropriate and damage the character of the building.
- Unsuitable for a converted listed building within a conservation village.

Social and Safety concerns

- There is a common entrance and hallway. There are women living alone within other flats. There is a safety/security concern regarding strangers being in the building.
- The intercom does not work so keys would need to be given out. Security concern.
- Codes/keys being passed out would invalidate insurance claims.
- Residents would be unvetted on arrival and the owner/applicant does not live nearby.

Traffic, parking and accessibility

- Increased parking demand around the building.
- Non-residents will not be aware of the need to drive slowly and carefully given surrounding care residents.
- Lack of infrastructure, amenities and vulnerable adults and children.

Other matters

- No evidence of short term let within other properties in Quarriers.
- Title deeds prohibit any house to be used for any trade, business or profession.
- Flats at 1 Mount Zion should also be given the opportunity to make comments however they do not appear to have not been included within the neighbour notification.

These comments will be addressed in the assessment below.

ASSESSMENT

The material considerations in the assessment of this application are: National Planning Framework 4 (NPF4); the 2019 adopted Inverclyde Local Development Plan (LDP); the 2021 proposed Inverclyde Local Development Plan (LDP); Inverclyde Planning Policy Supplementary Guidance – 'Short Term Lets'; the impact on the character, amenity and functionality of the property and surrounding conservation and residential area, listed designation of the building, the consultation response and representations received.

Policy Context

Both LDPs locate the application site within the Quarrier's Homes Conservation Area, the property is Category B listed and within an established residential area and therefore requires consideration under Policies 1, 7 and 14 of NPF4; Policies 1, 28 and 29 of the adopted LDP and Policies 1, 20, 28 and 29 of the proposed LDP.

The proposal involves a change of use to short term lets, which is considered an unclassified or 'sui generis' use. It is a use which is associated with tourism, therefore Policy 30 of NPF4 and Policies 27 of both adopted and proposed Plans are of relevance.

Policy 11 of the adopted LDP and Policy 12 of the proposed LDP are also applicable as the proposed change of use has the potential to impact on traffic and parking on the surrounding network.

The Inverclyde Council Short Term Lets Supplementary Guidance provides specific advice in relation to the proposed use.

Using the flat for short term lets is considered, in general terms, to accord with the quality of being "Adaptable" under Policy 14 of NPF4 and the quality of being "Resource Efficient" under Policy 1 of both the adopted and proposed LDPs. As the proposal is within the existing urban residential area, it is in a sustainable location and generally accords with the terms of Policy 1 and 2 of NPF4.



View of the property from southerly aspect, on Church Road

Impact on the character of the area

It is important to fully consider how this use will impact on the amenity of the surrounding area, considering immediate residential neighbours and the impact of transient visitors and the associated servicing/maintenance/cleaning of the property between stays as a potential to cause disturbance.

The short-term let use whilst an alternative and uncommon form of residential accommodation within the village is not considered to be out of character within this predominantly residential area. It is noted that the wider area is not exclusively residential, as businesses and residential institutions also exist with associated traffic/activity. This proposed use will be similar to the residential activity and noise typically associated with a residential property, not normally exceeding any disturbance typically associated with long-term residents.

It should be noted that subsequent consents of a similar nature within the same building (or neighbouring buildings and properties) could result in an emerging cumulative residential amenity impact, changing the nature of the locality from one of conventional owner occupation and long-term tenancy arrangements to one associated with a short-term transient use. This area is not currently experiencing a cumulative impact from short term lets and no other properties within the building are short-term let. This will be monitored given the requirement for planning permission and to ensure no over-provision which could comprise the amenity and character of the area and to ensure compliance with the Short Term Lets Supplementary Guidance.

Overall, the area will broadly remain characterised by long term tenancy or owner occupation of property, and this proposed change of use to short-term letting is not considered a significant alteration to the use and profile of the local area or to adversely impact its character, functionality or amenity, in accordance with the Inverclyde Short Term Let Supplementary Guidance. As no internal or external alterations are proposed the historic assets i.e. the character and amenity of the conservation area and listing designation of the building are not impacted.

Should any excessive noise result from the use of the property, this should be reported to the Council's Public Protection Service to investigate under their remit and any anti-social behaviour reported to Police Scotland. Matters of any anti-social behaviour, maintenance of shared communal areas within the building and entrance and checking in/out arrangements for tenants should also be reported directly to the owner.



View of the properties communal entrance

Tourism and housing variety

In relation to the tourism aspect, there is potential for direct economic benefits from the proposal. Occupants could include tourists, people visiting family and other short-term leisure uses although other users could be tradespeople and workers. Use of the property for lets opens the possibility of further spending on goods and services. This would be a factor if the occupants are tradespeople and professionals, staying for longer- or medium-term periods. Tourist visitors may also provide a similar net spend. However, this is difficult to quantify, and it is not possible to state unequivocally what proportion of occupant's net spend would be local in nature. It is likely, however, that the economic impact would be positive.

It is also recognised that short term lets can provide benefit to the choice and variety of housing options on the market by providing short term solutions, for emergency housing needs and those moving between properties as well as providing support for accommodation for workers, to reduce travel requirements, in accordance with the Inverclyde Planning Policy Supplementary Guidance - 'Short Term Lets'.

Traffic, parking and infrastructure

In considering the impacts of the development on traffic and parking on the street scene, the Head of Service - Roads and Transportation - advises that as the number of bedrooms remains as two, there is no requirement for additional parking as a result of the proposal. It is also acknowledged that the property is within a settlement and residential area where public transport connections exist. Taking this into consideration, it is considered unlikely that the development would have an adverse impact on the operation of the transport and active travel networks. The development therefore accords with Policy 11 of the adopted LDP and Policy 12 of the proposed LDP.

With regards to the lack of infrastructure and amenities within the village, this is not a valid reason to refuse the application. A diverse accommodation type would be achieved for prospective occupants wishing to utilise the let for a variety of reasons, including work and leisure.

Outstanding Representations

The concern raised by representation regarding wear and tear and disrespect of communal shared spaces by the prospective residents must be treated as speculative and is not a valid reason to refuse planning permission.

All such, matters regarding use and maintenance are matters for shared owners. The fitting of a key safe is not proposed as part of this application and therefore must also be treated as conjecture. Any physical external alterations require planning permission and listed building consent and should be applied and assessed under any subsequent, separate applications.

It is not considered that the proposal will compromise the safety of existing residents, and therefore this must again be treated as conjecture. Any concerns of safety and access arrangements should be directed to the owner and actual incidents reported to Police Scotland. This is not a material consideration which would justify the refusal of planning permission.

Conflicts with title deeds and insurance terms are a separate civil matter to be discussed and resolved between the parties involved.

The neighbour notification and overall publicity of the application was undertaken correctly in accordance with the requirements of planning legislation.

Conclusion

In conclusion, the use of the flat for short term lets is acceptable when assessed against the relevant policies of NPF4 and of the adopted and proposed Local Development Plans; and Inverclyde Planning Policy Supplementary Guidance – 'Short Term Lets'. There are no material considerations that outweigh these policies.

RECOMMENDATION

That the application be granted subject to the following condition:

1. The development to which this planning permission relates must be begun within 3 years from the date of this permission.

Reason: To comply with Section 58 of the Town and Country Planning (Scotland) Act 1997 (as amended).

Neale McIlvanney
Interim Director
Regeneration

Local Government (Access to Information) Act 1985 – Background Papers. For further information please contact Carrie Main on 01475 712413.