
Report To:	Environment & Regeneration Committee	Date:	25 October 2018
Report By:	Corporate Director Environment, Regeneration and Resources	Report No:	E+R/18/10/02/SJ/AW
Contact Officer:	Alan Williamson	Contact No:	01475 712491
Subject:	Inverclyde Local Development Plan		

1.0 PURPOSE

- 1.1 The purpose of this report is to advise Committee on responses received to the consultation on the Inverclyde Local Development Plan: Proposed Plan (2018) and to provide Members with notice of the 'Schedule 4s' for submission to the Scottish Government for examination.

2.0 SUMMARY

- 2.1 The Inverclyde Local Development Plan: Proposed Plan was published on 30 April 2018 with a consultation period running until 29 June 2018. The consultation generated 570 responses covering a range of issues, the vast majority of which relate to the issue of housing land.
- 2.2 The Local Development Plan – Proposed Plan sets out the Council's settled view in respect of spatial planning policy for Inverclyde. As there are unresolved representations to the Proposed Plan, it is necessary to submit it to the Scottish Ministers for Examination. To facilitate this, the Council prepares what are known as Schedule 4s, which summarise the representations received on the Plan and the Council's response to these. Appendix 1 sets out the changes to the Plan that have been suggested through the consultation that officers recommend the Council should not be opposed to. The Schedule 4s are a background paper to this report.

3.0 RECOMMENDATIONS

- 3.1 It is recommended that the Committee grant delegated powers to the Head of Regeneration & Planning to submit the Proposed Plan to Scottish Government for Examination, and approve Appendix 1 as changes to the Plan that are acceptable to the Council.

Stuart W. Jamieson
Head of Regeneration & Planning

4.0 BACKGROUND

- 4.1 The Local Development Plan is the document which sets out the Council's strategy and policy for the use of land and buildings across the Council area. Together with the National Planning Framework, Scottish Planning Policy, and the Glasgow and the Clyde Valley Strategic Development Plan (Clydeplan), it provides the planning framework for the future development of the area and forms the basis for the determination of planning applications. The current Local Development Plan was adopted in August 2014, and legislation requires that a replacement plan should be adopted within 5 years i.e. by August 2019.
- 4.2 The Local Development Plan is a statutory document and its preparation follows a statutory process, including key stages when documents are published for consultation. The Main Issues Report was published on 31 March 2017, and a report on the outcome of that consultation was considered by Committee on 31 August 2017. The Proposed Plan is the next key stage in the preparation of the Plan, and is important as it reflects the 'settled view' of the Council as to what the final adopted content of the Plan should be. The Proposed Plan was approved by Committee on 28 March 2018, with the consultation period running from 30 April 2018 until 29 June 2018.

5.0 PROPOSED PLAN CONSULTATION RESPONSES AND SCHEDULE 4s

- 5.1 The Proposed Plan consultation generated responses from 570 separate respondents. Respondents include private individuals (518), local businesses (2), community councils (4), planning consultants/developers/landowners (22), Councillors/MSP (5), Government/Key Agencies (11), national and local organisation/interest groups (7) and one (1) internal response. Engagement activities included direct notification of individuals/organisations previously involved or having registered their interest in the process and direct notification of properties within 20 metres of proposed development sites. The consultation on the Plan was publicised on the Council's website and social media and in other local newspapers/websites. An exhibition publicising the consultation on the Plan was also placed in various locations around Inverclyde. The consultation period ran for almost two full months, in excess of the 6 week period required by statute.
- 5.2 The vast majority of points raised through the consultation related to the Proposed Plan itself, and it is these points that are the subject of this committee report. However, comments were also received in respect of documents that accompanied the publication of the Proposed Plan, including the draft Action Programme, the Proposed Development Site Assessment, the Local Nature Conservation Site Assessment, the Strategic Environmental Assessment, the Strategic Flood Risk Assessment and Supplementary Guidance. These will be considered in due course and reported back to Committee where appropriate. Reports summarising the issues raised through the consultation on the Proposed Plan and accompanying documents have been published as background papers to this report.

Proposed Plan Responses

- 5.3 Having regard to the number of responses or the significance of the matter raised, the main issues raised through the consultation (in chapter order) are considered to be:

Greenock, James Watt Dock/Garvel Island – concerns/objections were submitted in relation to housing development opportunities in this area and the impact they could have on industrial/maritime operations. There was also support for residential/mixed use development.

Greenock, Spango Valley – there was support for a more housing-led redevelopment of the site with more flexibility with regard to the split of land for different uses. There was also an objection to the development of the site for housing.

Greenock, The Harbours – there was a request from West College Scotland for educational uses to be added to the range of uses acceptable on the site. There was also support for the mixed use approach proposed by the Plan, along with objections to its use for housing development.

Kilmacolm village centre car parking – there were requests for the Plan to identify land for a car park in Kilmacolm village centre.

Green Belt – there was a significant level of support for the Plan's position of retaining/protecting the green belt, particularly from housing development in the Kilmacolm/Quarriers Village area. There were also calls for a green belt review to be undertaken and for green belt release for housing development, particularly in the Kilmacolm/Quarriers Village area.

Affordable housing policy – there was support from Homes for Scotland for the removal of the requirement for affordable housing from all private sector sites. With regard to the 25% social rented housing requirement on greenfield sites in the Inverclyde villages, there was some support for this, but also comments that it should not be restricted to social rented housing and that if there is a requirement for social housing then land should be released to meet it.

Gourock, Kirn Drive – there were objections/expressions of concern in respect of housing development on this site, with a focus of concern being additional traffic.

Gourock, Weymouth Crescent – there was a significant number of objections to housing development on this site, particularly affordable housing development within an otherwise private estate.

Greenock, Killochend Drive - there was a significant number of objections to housing development on this site, with some of the objections referring to concerns about affordable housing.

Greenock, Papermill Road – the Plan mistakenly included a housing development opportunity on an area of open space at Papermill Road. Whilst a correction statement was issued, several objections were received in respect of this site. A similar error was made in relation to a site in Bow Farm, and an objection was received in respect of it too.

Greenock, Peat Road/Hole Farm - there was a significant number of objections to housing development on this site including petitions, with some of the objections raising concerns about affordable housing.

Greenock, Ratho Street/MacDougall Street –objections were received relating to the rezoning of this area from business/industrial use to a housing development opportunity.

Greenock, Ravenscraig Hospital – there was a significant number of objections to housing development on this site, with some of the objections referring to concerns about affordable housing.

Housing land – there were objections from the development industry concerning the Plan not identifying enough land for housing development, particularly in the Renfrewshire Sub Housing Market Area (Kilmacolm and Quarriers Village). Sites proposed for development in this area include: West of Quarry Drive, Knapps, North Denniston, ARP field, Planetreeyetts, West Glen Road, Police Station field, The Plots - all Kilmacolm, and Carsemeadow, Quarriers Village. There was also support for these sites not being included in the Plan.

Submission of Proposed Plan for Examination

- 5.4 Where there are unresolved representations/objections to the Local Development Plan, the Council is required to submit the Plan and representations received to the Scottish Government for Examination. To assist this process, the Council prepares what is known as Schedule 4s. These documents list the respondents in respect of an identified issue and summarise their response and the changes they would like made to the Plan in respect of that issue. Within the Schedule 4 the Council also sets out its response to the representations received. It is important to restate that the Proposed Plan is the Council's 'settled view' of what it wants the content of the adopted Plan to be. Any material changes made by the Council to the Plan at this stage, for example adding or removing a housing development

opportunity, would result in a requirement to publish a modified Plan for a minimum 6 week consultation period, during which all aspects of the Plan could be commented on. There is scope within the Schedule 4s for the Council to agree to changes suggested to it through the consultation exercise, subject to the changes being non-material, for instance changes to the wording of a policy which do not alter the purpose of the policy.

- 5.5 Appendix 1 sets out the changes to the Plan which the Schedule 4s indicate as being acceptable to the Council. The Schedule 4s are a background paper to this report

Next steps

- 5.6 According to the Development Plan Scheme, the Council is scheduled to submit the Plan to the Scottish Ministers for Examination by November 2018. Thereafter, the Examination is expected to take 6-9 months. Depending on when the Examination report is received from the Scottish Ministers, this could allow for the new Plan to be adopted within 5 years of the adoption of the current Plan, which is the target. The Examination is expected largely to be based on the written representations received and the Council's responses set out in the Schedule 4s. However, it is possible that the Reporter may seek a Hearing session in respect of some issues.

6.0 IMPLICATIONS

Finance

- 6.1 The cost of the Local Development Plan Examination is met by the Council. The Examination is likely to stretch over financial years 2018/19 and 2019/20. Based on the costs of the previous Local Development Plan these are expected to be in the region of £30-40k, with this cost being met from existing budgets.

Financial Implications:

One off Costs

Cost Centre	Budget Heading	Budget Years	Proposed Spend this Report	Virement From	Other Comments
		2018-19 2019-20	£40,000		

Annually Recurring Costs/ (Savings)

Cost Centre	Budget Heading	With Effect from	Annual Net Impact	Virement From (If Applicable)	Other Comments
N/A					

Legal

- 6.2 Planning authorities are statutorily required to keep an up-to-date Local Development Plan. The submission of the Proposed Plan for Examination meets the requirements of the Council in this regard.

Human Resources

- 6.3 There are no personnel issues associated with this report.

Equalities

- 6.4 An Equalities Impact Assessment was prepared in respect of the Proposed Plan. This concluded that the Local Development Plan: Proposed Plan will have a neutral impact on the

protected characteristic groups identified under equalities legislation. None of the changes to the Plan included in the draft Schedule 4s would materially affect this conclusion.

Repopulation

- 6.5 Through identifying land for residential development and economic growth, as well as safeguarding Inverclyde's environment, the Local Development Plan will contribute to the repopulation agenda.

7.0 CONSULTATIONS

- 7.1 The Chief Financial Officer and the Head of Legal and Property Services were consulted during the preparation of this report.

8.0 LIST OF BACKGROUND PAPERS

- 8.1 Inverclyde Local Development Plan: Proposed Plan (2018)
Proposed Plan responses by document and chapter
Proposed Plan responses by respondent (Proposed Plan responses only)
Schedule 4s

Appendix 1: Suggested modifications to the Proposed Plan that the Council has not opposed through the Schedule 4s

Suggested modifications to the Proposed Plan that the Council has not opposed through the Schedule 4s

Section 3: Creating Successful Places

The Harbours, Greenock – change the reference from ‘marine-based business uses’ to ‘marine based business and industrial uses’.

James Watt Dock/Garvel Island, Greenock – in Schedule 9 include as an indicative business and industrial development opportunity (E9), and in Schedule 2 change reference from ‘maritime-based commercial enterprises’ to ‘marine-related business and industrial uses’.

Spango Valley Greenock – in Schedule 2 include Secure Residential Institution and park-and-ride within acceptable uses in the Preferred Strategy column.

Change reference from ‘Affordable Housing Delivery Programme’ to ‘Affordable Housing Supply Programme’ (p. 8).

Section 4: Tackling Climate Change

Climate Change – amend target in final bullet point of paragraph 4.2 from 94% to 70% (to reflect finalised Climate Change Plan).

Wind energy spatial framework – include a version of Diagram 3 from the Energy Supplementary Guidance in the Plan.

Supplying Energy – include reference to Our Natural and Open Spaces in criterion (a) so as to refer to all of the resources protected by Section 11 of the Plan.

Heat Networks – include the following sentence at 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.”

Low and Zero Carbon Generating Technology – amend Policy 6 to specify a proportion of greenhouse gas emissions to be saved through the use of low and zero carbon generating technology (1% specified rising to 2% in 2022).

Waste Reduction and Management - – include reference to Our Natural and Open Spaces in criterion (e) so as to refer to all of the resources protected by Section 11 of the Plan; amend final sentence of Policy 7 to refer to efficient waste management.

Managing Flood Risk – amend criterion (a) to read ‘be at significant risk of flooding (*i.e. within the 1 in 200 year design envelope*)’.

Surface and Waste Water Drainage – amend Policy 9 to require the provision of SuDS during the construction phase of a development.

Section 5: Connecting People and Places

Promoting Sustainable and Active Travel – amend the first sentence in paragraph 5.5 to refer to the sustainable travel hierarchy; amend the second sentence in paragraph 5.5 to strengthen the requirement for walking and cycling connections within new developments and to the external walking and cycling network;

Managing Impact of Development on the Transport Network – insert a new sentence paragraph 5.7 to strengthen the requirement for Transport Assessments and mitigation measures; amend the (existing) second sentence of paragraph 5.7 to make clear it is the strategic *road* network that is being referred to; amend the first sentence of Policy 11 to also refer to the active travel network.

Communications Infrastructure – change reference in Policy 13 from ‘green network’ to ‘our natural and open spaces’.

Section 6: Our Towns, Villages and Countryside

Greenock – include reference to West College Scotland being based in Greenock.

Soils – amend Policy 15 to strengthen the protection of agricultural land and carbon-rich soils.

Kilmacolm, Smithy Brae – correction of Proposals Map to include a small area of land at Smithy Brae within the village boundary. It had been mistakenly identified as green belt. It is identified within the village boundary in the current adopted plan.

Kilmacolm, Port Glasgow Road - correction of Proposals Map to include a small area of land at Port Glasgow Road (former quarry) within the village boundary. It had been mistakenly identified as green belt. It is identified within the village boundary in the current adopted plan, and is currently under development.

Section 7: Our Homes and Communities

Affordable housing supplementary guidance – include reference to full title of Supplementary Guidance ‘Affordable Housing in the Inverclyde Villages’ in paragraph 7.2, Policy 17 and Policy 18.

Community facilities – at the Reporter’s discretion, to make clear Policy 21 applies to Education facilities.

Remove housing development opportunities R43 (Papermill Road) and R45 9Upper Bow) from Schedule 4 and the Proposals Map in order to correct an error. Refer to clarification statement.

Section 9: Our Jobs and Businesses

Tourism Development – amend reference in policy from ‘green network to ‘our natural and open spaces’.

Mineral extraction – amend first sentence to indicate that the Council is unaware of workable mineral resources within the Council area.

Include reference to James Watt Dock as an indicative opportunity in Schedule 9, Business and Industrial Development Opportunities

Proposals Map – Changes to the Proposals Map to reflect the Written Statement:

Change designation of land at Inchgreen, Greenock from (a) to (b)

Change designation of land at Pottery Street, Greenock from (a) to (d)

Change designation of land at Ocean Terminal, Greenock from (a) to (c)

Section 10: Our Historic Buildings and Places

Listed Buildings – amend Policy 29 to set a policy framework for the assessment of proposals to demolish listed buildings.

Scheduled Monuments and Archaeological Sites – amend Policy 31 to refer also to the setting of Scheduled Monuments.

Section 11: Our Natural and Open Spaces

Gourock, Dunvegan Avenue – redesignate an area of land with planning permission for a dwellinghouse from open space to residential area.

Biodiversity and Geodiversity (Policy 33) – in section on Natura 2000 sites, change ‘or’ between the criteria to ‘and’ so as to ensure all criteria are complied with; possible change to Protected Species section to refer to relevant legislation and licensing; add wording to end of paragraph 11.8 requiring landscape and visual impact assessments when required.

Trees, Woodland and Forestry – include reference to the full title of the Supplementary Guidance.

Green Infrastructure – amend Policy 36 so that it is referring to the full/proper title of the Supplementary Guidance; reference to trees and hedges in the first sentence of paragraph 11.19.

Water Environment – add a criterion to Policy 39 requiring buffer strips between development and watercourses and another criterion referring to Scotland’s National Marine Plan and the Clyde Regional Marine Plan.

Proposals Map

Re-designate land to the north of the railway line at Ladyburn from residential area to business and industrial area.