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**Report To:** Safe, Sustainable Communities Committee      **Date:** 25 October 2011

**Report By:** Corporate Director,  
Regeneration and Environment      **Report No:** R&E/R&P/SSC  
10/11RG006

**Contact Officer:** Stuart W Jamieson      **Contact No:** 712402

**Subject: Inverclyde Local Development Plan: Main Issues Report –  
Representations Received**

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## 1.0 PURPOSE

- 1.1 To inform the Committee of the representations received on the Inverclyde Local Development Plan: Main Issues Report; seek authority to conduct a further public consultation exercise on those new suggested development sites which were not identified in the MIR; and authorise continued engagement with stakeholders.

## 2.0 SUMMARY

- 2.1 The Committee approved publication of the Inverclyde Local Development Plan: Main Issues Report for consultation in May. This concluded on 22 July. A public notice was placed in the Greenock Telegraph, letters sent to all stakeholders, leaflets, posters and banners distributed, and documents deposited in libraries and the main Council offices. Min Ref:  
03/05/11,  
para 305
- 2.2 Sixty-two responses were received to the MIR, the greatest number from those with a development interest in Inverclyde. Nearly half relate to housing and Green Belt matters, and in addition several sites in the Green Belt were identified by the owners seeking a housing allocation. Comments were also received on the Council's preferred spatial strategy, the Housing Need and Demand Assessment and affordable housing.
- 2.3 Support was received for the inclusion of policies incorporating green network principles in the forthcoming Proposed Plan. Broad support was also received for policies to protect the most significant areas of open space and seeking alternative uses for those that contribute little to the environment. The proposed new conservation area in Kilmacolm generated interest from the local community, and a number of representations were received in support of the 'enabling policy' in the forthcoming Plan.
- 2.4 In regard to town centres, comments supporting the extension of Greenock and Port Glasgow were received, mainly from retail operators and their agents who have a development interest on the edge of current centre boundaries. Representations were also received seeking alternative uses (mainly housing) on business and industrial areas and support from two key agencies for more flexibility on certain business locations.

## 3.0 RECOMMENDATIONS

- 3.1 That the Committee:
- (a) notes the representations received during the consultation on the MIR (Annex 1);
  - (b) authorises a further public consultation exercise to be undertaken for those new suggested development sites which were submitted after the publication of the MIR; and
  - (c) authorises the continued engagement with Key Agencies, selected other stakeholders and those organisations, developers and individuals who request further discussion.

**Aubrey Fawcett**  
**Corporate Director, Regeneration and Environment**

## 4.0 BACKGROUND

- 4.1 Members will recall approving at Committee on 3 May 2011, the publication of the Inverclyde Local Development Plan: Main Issues Report (MIR) for consultation. The MIR is the second formal stage in the process prescribed under The Planning etc (Scotland) Act 2006 and the Development Planning Regulations (2009), to deliver the first new style Local Development Plan for Inverclyde, the first stage being the Development Plan Scheme (DPS) and Participation Statement (PS). The next formal stage will be the publication of the Proposed Plan, the completion date of which has been identified in the DPS as May 2012. Min Ref:  
03/05/11,  
para 305
- 4.2 The MIR, being a consultative document designed to stimulate discussion on the main areas where the new Local Development Plan is likely to differ from the adopted Inverclyde Local Plan (2005), does not deal with all matters which will be included in the Proposed Plan. While under the previous development plan process, a consultative draft plan would have included a draft of all policies and proposals to be included in the final plan, and consultation undertaken on the entire plan, the MIR only considers the significant areas of change, the 'big ideas' and highlights what the Council's preferred approach is. As a result of this, it should be noted that the vast majority of comments received in this MIR consultation related to these main issues, and do not consider other policy matters that will emerge in the Proposed Plan (refer Annex 1).
- 4.3 In parallel with the publication of the MIR, legislation in the form of the Environmental Assessment (Scotland) Act 2005 requires a Strategic Environmental Assessment (SEA) to be undertaken and consulted upon. The comments from the Consultation Authorities on the SEA have been identified at the end of Annex 1, while comments from others on the SEA have been recorded throughout the annex.
- 4.4 Members will also be aware of the current position in regard to the Glasgow and the Clyde Valley Strategic Development Planning Authority (GCV SDPA) Proposed Plan, the consultation of which ended on 26 August 2011. On 30 August 2011, the Committee noted the publication of the GCV SDPA Proposed Plan and endorsed those matters of particular relevance to Inverclyde, many of which will be taken forward through the LDP Proposed Plan for Inverclyde. Min Ref:  
30/08/11,  
para
- 4.5 The SDP and the LDP together will form the new Development Plan for each of the eight constituent planning authorities within the City region, the preparation of which requires to be on a 'twin tracking' approach. In this regard the Scottish Government has noted that Inverclyde's MIR was published slightly in advance of the GCV SDP Proposed Plan and has reminded the Council that the Circular (Planning Circular 1/09: Development Planning) states that "*LDP main issues reports or proposed plans may be published on the basis of a proposed SDP, but the LDP should not be submitted to Ministers until the SDP has been approved.*" The publication of Inverclyde's LDP Proposed Plan will therefore be in part determined by the approval date of the SDP by the Scottish Government. Current thinking suggests that it will be the summer of 2012 before Scottish Ministers are in a position to approve the new GCV SDP, following an Examination in Public to be held on the Plan this spring. In view of this, our DPS on the Inverclyde LDP Proposed Plan will require to be reviewed.

## 5.0 PROPOSALS

- 5.1 Public consultation on Inverclyde Council's first MIR was undertaken between 27 May and 22 July 2011. The consultation was advertised by way of a public notice in the Greenock Telegraph, articles in the press and InView magazine, letters sent to all stakeholders, the distribution of leaflets, posters and banners and the documents being deposited in all libraries and the main Council offices. As a result of this, 62 responses were received (and acknowledged), as follows:
- The Scottish Government
  - 2 from Councillors

- 2 from Council Services
- 2 from Neighbouring Authorities
- 5 from Key Agencies
- 7 from National Organisations
- 4 from Local Organisations
- 3 from Community Organisations
- 7 from Private Individuals
- 29 with development interests

The majority of issues raised related to the identified main issues contained in the MIR, although some other matters were also raised. All responses have been recorded in Annex 1, and where appropriate a Council comment has been included.

- 5.2 The MIR was divided into four main themes – the economy, town centres, the environment and housing. A fifth section in the MIR identified ‘suggested development sites’, sites which the Council were asked to consider for development by a mix of local landowners and developers.

### **Strategy/Housing/Green Belt**

- 5.3 Of the 62 responses received, more than half of the representations made a comment on a housing related matter. In the main this was a mix of support for, or objection to the ‘suggested development sites’ identified in the MIR, often requiring a change from Green Belt, but also from business/industrial land to housing. In addition to the representations on the sites in the MIR, several new sites within the Green Belt were identified by the owners who are seeking a housing allocation. As these new sites have not been exposed to public consultation through the publication of the MIR, it is proposed to undertake a further ‘mini-consultation’ whereby interested individuals or communities will be able to make representations on them. Linked to this requirement will be an additional SEA report on the sites submitted and a consideration given to the potential cumulative effects of these additional sites on the environment of Inverclyde.
- 5.4 Several representations supported or opposed the broad strategy of a preference for development on brownfield sites (‘urban containment’), and a few had comments to make on the GCV Housing Need and Demand Assessment (HNDA), the background report to the MIR on housing matters and used also as an evidence base to support the Council’s preferred spatial strategy.
- 5.5 Finally in regard to housing matters, the identification of affordable housing generated a number of responses, mostly recognising the need for the Proposed Plan to consider the matter in greater detail and supporting the need for an Affordable Housing policy in the Plan. In several instances the provision of affordable housing was used as a justification for the release of Green Belt land for mainstream housing development.

Min Ref:  
18/01/11,  
para 34

### **Environment**

- 5.6 A significant amount of support was received for the inclusion of policies incorporating green network principles in the Proposed Plan. The MIR’s preferred approach related to its application to the designated regeneration areas only, but support for a wider application is noted. In a similar manner, there was broad support for policies in the new Plan protecting the most significant areas of open space and seeking alternative uses for those that contribute little to the environment.
- 5.7 The proposed introduction a new conservation area in Kilmacolm generated an interest from the local community, with the view expressed that further work is needed to justify its designation. No comment was received on a similar proposal in Gourrock along the Ashton seafront.
- 5.8 A small number of representations were received in support of the inclusion of an ‘enabling policy’ in the forthcoming Plan, including from the representatives of Ardgowan Estate, Duchal Estate and Balrossie House. A general welcoming of clarification on the

intention of this policy was received.

### **Town Centres**

- 5.9 The MIR identified the boundaries of three 'town centres' as significant issues that need to be addressed in the new Plan. A number of comments were received in support of the extension of Greenock and Port Glasgow, mainly from the retail operators and their agents who have a development interest on the edge of the current centre boundaries.

### **Economy**

- 5.10 A few representations to the MIR were received from companies with an interest in specific business or industrial locations, both for changes in policy to allow alternative uses (mainly housing) and to consolidate existing employment uses. Representations from two of the key agencies were also received in support of some flexibility being given to the uses on certain business and industrial areas, although there was also one objection to any change to alternative uses at Spango Valley.

### **Others**

- 5.11 Finally, and not unexpectedly, several comments were received which are not relevant to a LDP, mainly because they relate to other Council services. These comments will be passed on to the appropriate service to be addressed. In addition, some comments were received on issues not included in the MIR, but which respondents felt were equally of importance. In most of these cases, the current Local Plan already deals with the matter and the LDP: Proposed Plan will continue to include policy or proposals relating to these issues.

### **Some Issues arising for the Proposed Plan**

- 5.12 As stated above, this local development plan consultation is the first to be undertaken under the new planning legislation in Inverclyde, and indeed the first to be undertaken within all eight constituent authorities within the Glasgow City region. As a result of this, a number of lessons have been learned about the new planning system, and some concerns identified for the next stage of the process.
- 5.13 Not the least of these concerns is the fact that a MIR is an 'incomplete plan', dealing only with the 'big issues' and the significant changes from the current adopted Local Plan. This coupled with an undoubted misunderstanding of what a MIR is amongst many involved in the process, including government agencies, developers, agents and the public in general, has resulted in a more limited response to the consultation exercise than would otherwise have been the case. Under the former system, a consultative draft plan would have been published at this equivalent stage, where *all* proposed new policies and proposals would have been aired in advance of the publication of a finalised plan. Under the new system, the potential exists for an increased level of representations coming forward at the proposed plan stage, being the first opportunity that stakeholders will have to comment upon the more detailed, but nevertheless significant policies and proposals. This in turn could lead to further delays with more issues requiring to be considered at the examination stage, in spite of the intention of the new system to avoid this by being more 'front loaded'.

### **Further Public Consultation**

- 5.14 The not entirely unexpected late submission of further sites for development also necessitates a further round of public consultation, to allow the public and other interested stakeholders the opportunity to view and comment upon these additions. The 'front-end loading' of the new development plan process also required all sites included in the MIR to be the subject of a SEA. For consistency and comparability across all submitted proposals for development, these additional sites will also require a SEA. This can only lengthen the process but is a necessary requirement under the 2006 Planning, etc. (Scotland) Act.

## 6.0 IMPLICATIONS

6.1 There are no financial, legal or personnel implications arising from this report, nor any implications for other services of the Council at this stage of the Plan preparation. It should be noted however, that close liaison continues with Safer and Inclusive Communities, Housing Team, to ensure the outcomes and conclusions being reached on the HNDA for the finalised Local Housing Strategy 2011-2016 (item xx on this agenda) are relevant to, and consistent with, responses to the representations made on housing issues in the MIR. This applies particularly to those being made for strategic release of Green Belt land for housing.

### 6.2 Finance:

Financial implications – one-off costs

Cost Centre	Budget Heading	Budget Year	Proposed Spend this Report	Virement From	Other Comments
n/a	n/a	n/a	n/a	n/a	n/a

Financial implications – annually recurring costs/(savings)

Cost Centre	Budget Heading	Budget Year	Proposed Spend this Report	Virement From	Other Comments
n/a	n/a	n/a	n/a	n/a	n/a

6.3 **Legal:** none

6.4 **Personnel:** none

6.5 **Equalities:** the report has no impact on the Council's Equalities policy.

## 7.0 CONSULTATION

7.1 **Chief Financial Officer:** no requirement to comment.

7.2 **Head of Legal and Democratic Services:** no requirement to comment.

7.3 **Head of Organisational Development and Human Resources:** no requirement to comment.

## 8.0 CONCLUSIONS

8.1 The 62 representations received during the consultation on the MIR were largely concerned with the very specific 'main issues' identified in the document, being areas where the forthcoming Local Development Plan will differ from the adopted Local Plan. The potential exists therefore for an increased number of representations to be received during the publication of the Proposed Plan, as this will be the first opportunity that stakeholders will have to make their views known on the detailed policies and proposals within the Plan.

8.2 As the SDP and the LDPs of the constituent planning authorities together form the Development Plan, a 'twin tracking' approach is required, whereby the SDP needs to be approved by Scottish Ministers before a LDP is published. The publication of the LDP for Inverclyde will therefore be influenced by the approval date of the GCV SDP, which is not anticipated to be before the summer of 2012.

## 9.0 BACKGROUND PAPERS (pto)

- 9.1 The Inverclyde Local Development Plan: Main Issues Report (2011) is supported by a suite of documents, as outlined below. The MIR, SEA, Monitoring Statement and Background Reports are available as downloads from the Inverclyde Council web site – [www.inverclyde.gov.uk](http://www.inverclyde.gov.uk)

## **MIR Background Reports**

### Economy

- Economic Outlook and Scenarios for the Glasgow and Clyde Valley City Region (Oxford Economics, 2010 & 2011)
- National Renewables Infrastructure Plan – Scottish Enterprise & Highlands and Islands Enterprise (2010)
- Inverclyde Renewable Energy Hub – Brochure (ri, IC, Clydeport (Peel Ports)) (2010)
- Industrial and Business Land Supply (2010)
- Business/Industrial Floorspace Monitoring (2010)

### Town Centres

- Central Gourock Development Strategy (January 1999)
- Former East Glen/Scott Lithgow Yard Planning Applications
- Retail Trends (2010)

### Environment

- Area Under Peat in Inverclyde (British Geological Survey, 2008)
- PAN 65 – Planning and Open Space (2008)
- Open Space Survey Methodology (2010)
- Map of Open Spaces in Inverclyde (2010)
- Area Renewal and the Inverclyde Green Network : Integrated Masterplanning of New Neighbourhoods – Report by consultants erz (December 2010)
- PAN 71 – Conservation Area Management (2004)
- Inverkip Conservation Area Appraisal (Scottish Civic Trust, Draft Report, 2006)
- Proposed Conservation at Area West Bay, Gourock – Report to Planning and Development Committee (February 1991)
- Enabling Development and the Conservation of Significant Places – English Heritage (2008)

### Housing

- Housing Need and Demand Assessment – Glasgow and Clyde Valley Housing Market Partnership (Working Draft Report, November 2010)
- 'GCV HNDA – Working Draft Background Report for Consultation' (SSC Committee Report, January 2011)
- Report by consultants S&P Architects on Central East Greenock (March 2011)
- Clune Park Regeneration Strategy (2007, and subsequent updates)
- Housing Land Supply 2010
- Local Housing Strategy 2011-2016 Final Draft Version (October 2011)

### Other Relevant Documents

- The Planning etc (Scotland) Act 2006
- National Planning Framework for Scotland 2 (2009)
- Scottish Planning Policy 2010
- Glasgow and the Clyde Valley Joint Structure Plan 2006
- Glasgow and the Clyde Valley Strategic Development Plan: Main Issues Report 2010
- Inverclyde Local Plan 2005 (plus additions, 2007 – 2011)
- Inverclyde Local Development Plan – Development Plan Scheme (March 2011)
- Inverclyde Local Development Plan – Participation Statement (March 2011)
- Inverclyde Green Belt Review (2010)
- Pre-Main Issues Report Engagement Report (March 2010) Update 2010-2011
- Suggested Development Sites (2011)
- Equality Impact Assessment (2011)

## **ATTACHMENT**

### **Annex 1: Representations Received on the Inverclyde Local Development Plan: Main Issues Report**

Head of Regeneration and Planning  
Cathcart House  
6 Cathcart Square  
Greenock

10<sup>th</sup> October 2011

SSC Cmtee 2011 LDP MIR – Reps Received (Oct '11)

# Annex 1: Representations Received on the Inverclyde Local Development Plan: Main Issues Report

ID MR001

**Organisation** Rail Freight Group

**MIR Issues** **Responses**

Other  
Considers that rail freight would be relevant at Ocean Terminal. Unsure if attempts have been made to protect the line of the route for possible future use. Grangemouth still has an active rail link which gives the port an extra degree of flexibility.

## Planning Comments

Noted. The Development Plan (approved Glasgow and the Clyde Valley Joint Structure Plan and adopted Inverclyde Local Plan) provide policy protection for the solum of the former rail line. However, the owners, Peel Port Holdings (Clydeport) have investigated the costs in reinstating the railway line, including the Newton Tunnel and the area of land for loco-shunting at the Terminal, and concluded it is not economically viable to do so. Discussions on this matter with relevant parties in the context of national and strategic planning policy will be taken into account in deciding whether to retain a similar policy in the Local Development Plan. It should be noted that the SDP Proposed Plan identifies Ocean Terminal as one of five Strategic Freight Transport Hubs in the Glasgow City Region, with only the 'sea' noted as its mode of transport.

**ID** MR002

**Organisation** Gourock Business Club

**MIR Issues** **Responses**

NC Note the consultation and will be in contact if there are matters to be taken up.

**Planning Comments**

Noted.



**ID** MR003

**Organisation** Kilmacolm Regeneration Trust

**MIR Issues** **Responses**

SDS Smithy Brae, Kilmacolm

Request release of a portion of green belt land north of old gas works site to accommodate mixed residential development and enable other local facilities to be provided as well as a range of houses - starter homes, retirement homes and for those who wish to trade down from larger houses. This request is founded on the need to redevelop the area with a 'looser fit' than the consented scheme.

Increased land area would facilitate proper removal of contaminated material and allow proposals to deal with the local flooding issue in an appropriate way. Rights of way would be maintained and the car parking envisaged could include amenity landscaping to add to the creation of a 'sense of place'. The overall scheme includes the redevelopment of the old library to a retail unit, with flats above.

**Planning Comments**

Noted. The southern section of the site is within the settlement boundary of Kilmacolm. Two separate planning consents have been issued in the recent past for a total of 27 dwellings on this land, but the sites remain undeveloped.

Noted.

**ID** MR004

**Organisation** Nathaniel Litchfield & Partners

**Representing** JJ Gallagher Ltd

**MIR Issues** **Responses**

MI 6 Support Option 1.

It is clear Tesco already functions as part of extended town centre, wider site has potential to do the same.

It is critical flexibility is provided to re-ignite operator interest and ensure new development attracts a genuine mix of town centre functions. Particularly important given prominent location of site and contribution it can make towards regeneration of both Port Glasgow Town Centre and wider Inverclyde riverside corridor. Inclusion of site in town centre would provide this flexibility. Designation as a Commercial Centre would be inappropriate as it would relegate site to lower status than other town centre sites, and potentially edge of centre sites. This would ignore the reality of how the site functions, and have harmful side-effects, by restricting new development, and changes of use over time, required to ensure that local needs are met.

**Planning Comments**

Noted.

Agree that Tesco functions as part of the town centre.

Noted. The role of the site and the uses that will help achieve this will be given full consideration in the preparation of the Proposed Plan.

**ID** MR005

**Organisation** Alliance Planning

**Representing** Church of Scotland General Trustees

**MIR Issues** **Responses**

SDS The Glebe, Inverkip

Propose that the land south of Millhouse Road, Inverkip continues to be identified as a housing allocation with addition of land north of Millhouse Road as a further separate allocation in the forthcoming Inverclyde LDP.

The MIR suggests further land will be required in future and therefore request that all the church land be identified as suitable for housing and 'effective' as it is considered that it meets all the requirements in the PAN on Affordable Housing and Housing Land Audits (2010). Intend to carry out surveys where there are any potential problems.

**Planning Comments**

The land to the south of Millhouse Road is identified in the adopted Local Plan as a Housing Development Opportunity site (Policy H5). The land to the north of Millhouse Road is also within a residential policy area, Safeguarding the Character and Amenity of Residential Areas (Policy H1). It is also within the Inverkip Conservation Area.

Noted.

**ID** MR006

**Organisation** Neill, Clerk and Murray

**Representing** Millpond Development (Kilmacolm ) Ltd.

**MIR Issues Responses**

GBR Object to proposed boundary changes in Kilmacolm (KC011 and KC008).

Millpond Developments own the ground where boundary changes are proposed and consider that its value would be significantly reduced if these changes were effected.

Both areas have potential for limited housing development since they are adjacent to well established and recent housing developments, services and access. Both are within the Settlement Boundary and outwith the Green Belt. Although the company has not made any planning applications for these sites, it wishes to retain the option for the future which would become much more difficult if the proposed Green Belt boundary was introduced.

The current Green Belt boundary is very clearly defined, both on the ground and on the map, by the original Mill Lade (shown as 'drain' on the plan) and the edge of the old Mill Dam. For the reasons given the company requests Inverclyde Council to remove KC011 and KC008 from the Proposed Green Belt Boundary Changes in the Local Development Plan.

**Planning Comments**

Noted.

Land values are not a matter which can be taken into consideration in the determination of potential boundary changes.

Noted.

Noted. Discussion on this matter would be welcomed.

**ID** MR007

**Organisation** The Coal Authority

**MIR Issues** **Responses**

NC No specific comments to make at this point.

**Planning Comments**

Noted.

ID MR008

Organisation Clyde Muirshiel Regional Park

MIR Issues	Responses	Planning Comments
SS	Reference should be made to the Central Scotland Green Network which is partly in Inverclyde and is a national development commitment in the NPF2.	Agreed.
MI 8	Support guiding principles of sustainability in MIR which underlie the Development Strategy. Also support the Council's preferred approach of continuing the strategy identified in the current Local Plan.	Noted and welcome.
MI 9	As well as listing the benefits, more could be made of the key role of the natural environment in each chapter.	Noted.
	The content on peat is welcomed, particularly recognition of the importance of good moorland management for active peat formation.	Noted.
	Clarification required on the definition of open space, distinguishing between urban and rural areas. Suggestion of policies to apply to each.	Agreed.
	Would like to see the geographical area of the Area Renewal Strategy extended to west and east Inverclyde to take in Clyde Muirshiel Regional Park which is a major environmental asset. Agree with the Council's preferred option to take the study forward but suggest policies are developed for similar objectives outwith this area.	Noted.

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ID MR009

Organisation Homes for Scotland

**MIR Issues**

**Responses**

<b>MIR Issues</b>	<b>Responses</b>	<b>Planning Comments</b>
SS HNDA MI 8 MI 14 MI 15	<p>Raises relatively few new issues for the home building industry. LDP should demonstrate, at the point of adoption, it will have 10 years of effective/potentially effective housing land identified.</p> <p>Assertion that Kilmacolm/Quarriers and Inverkip/Wemyss Bay have no additional capacity for environmental, landscape and transportation reasons needs to be supported by technical evidence. Refers to SPP and a need for a suitable range and choice of sites.</p> <p>HNDA identification of backlog of affordable need raises the question as to whether these existing issues would have any relationship to market housing in policy terms, although recognise it concludes it will disappear in the medium term.</p> <p>Suggests that the Council needs to be open about its corporate aims and to discuss in the preparation of the proposed LDP whether a continuation of the current strategy, accompanied by diminishing opportunities for development in areas of potential high demand, will deliver those aims.</p> <p>Issue 8 - Commends the implementation of the requirements in SPP11 and PAN 65 by conducting a proper audit and assessment of open spaces and green space. These documents are clear that the outcome should be a strategy for local open space standards and provision in relation to local needs and the qualities/quantity/distribution of existing spaces.</p> <p>Feel that option 1 seems contrary to SPP in that it seeks to protect all existing spaces regardless of quality and function, surpluses, alternative approaches to rationalising or improving provision and maintenance issues. Feel option 2 is more in line with SPP and would support this.</p> <p>Issue 14 - Agree that a more site-specific approach rather than a percentage target affordable housing policy is appropriate.</p> <p>Concern remains to what extent identifying privately-owned land as suitable exclusively for affordable housing will work. There may be potential for challenge if private owners consider their ability to realise the value of their assets is being constrained by planning policy. May be a role for SG to set out circumstances and perhaps locations where a mix of tenures and house types will be sought within developments.</p> <p>Option 1 generally sets out the correct approach to identifying the overall scale of need, but needs to be amended to state that, within that overall need, preferred areas/locations which are most suitable for further affordable housing provision beyond that planned for the regeneration areas will be identified.</p> <p>Issue 15 - While preferred option sits well with the approach discussed under Issue 14, it would be important firstly to identify who has interest in these sites and explore the reasons for lack of development activity. As discussed, Inverclyde should be seeking to retain and improve a range and choice of housing sites to create the opportunities to promote growth in the future. The majority of sites identified under this issue are edge of settlement rather than brownfield/regeneration sites, and as such could contribute well to that wider range and choice of sites.</p> <p>Proposed Plan therefore needs to consider the individual circumstances of these sites in more detail before deciding whether to retain them as general housing allocations or look at their potential specifically for affordable housing.</p>	<p>Noted and agreed.</p> <p>Noted, and will provide further background technical information to support the reasoned justification in advance of the recommended housing development strategy in the Proposed Plan.</p> <p>Noted, an element of the existing backlog need has been incorporated in the projection of market and 'intermediate' housing.</p> <p>Noted, and will provide further background technical information to support the reasoned justification in advance of the recommended housing development strategy in the Proposed Plan.</p> <p>Noted.</p> <p>Noted and will examine further in advance of concluding on this issue for the Proposed Plan.</p> <p>Noted and welcome.</p> <p>Noted and agreed, but the intention would be to look at the issues on a site-specific basis, include a policy in the LDP, and incorporate more fully in SPG.</p> <p>Noted and agreed.</p> <p>Noted and agreed.</p> <p>Noted and agreed.</p>

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**ID** MR010

**Organisation** James Barr

**Representing** Duchal Estate

**MIR Issues** **Responses**

MI 8  
SS  
SDS

Main Issue 8 - Disagree with the Structure Plan assessment suggesting no additional housing is required.

It is unlikely that large complicated housing sites will be developed within the next 10 years.

Very little land release in Kilmacolm in the last 10-15 years therefore there should be a strategic release for housing.

There has been no growth in Kilmacolm for 2-3 plan periods.

Scottish Government guidance emphasises consideration of effective smaller sites where larger sites are unviable and infrastructure is prohibitive.

Advocate the release of Site 4 Milton Wood as it has a sustainable location; good accessibility; limited impact on the landscape and services in the proximity.

**Planning Comments**

Noted. The GCV SDPA in their Proposed Plan (June 2011) has concluded that there is no strategic requirement to expand the supply of land for private sector housing, to either 2020 or 2025.

Noted. The Housing Land Supply Audit 2011 demonstrates that this is not so for all 'large housing sites', Evidence to substantiate this claim would be welcomed.

Disagree. Further to the strategic position noted above, with reference to the situation in Kilmacolm, the HNDA indicates there could be a problem of housing provision for the affordable sector and this is being considered through the Council's forthcoming Local Housing Strategy and will be addressed in the forthcoming Proposed Plan.

Disagree. There have been 125 completions since 1990, the most notable one being on Port Glasgow Road between 2001 and 2004.

Noted. The MIR has indicated consideration will be given to augmenting the HLS with some selected release of smaller sites, as does the GCV SDP:Proposed Plan through the flexibility afforded local planning authorities in Strategy Support Measure No.10 in the Proposed Plan.

Noted.



**ID** MR011

**Organisation** Inverclyde Council Property Assets and Facilities

**MIR Issues** **Responses**

MI 2 Figure 4: Inchgreen is to be the new depot for Environmental & Commercial Services, it will incorporate a civic amenity site but this will only be part of the development.

Para 4.2: Adult Training Centre is now used as Building Services Depot. There is also a community facility in the building.

**Planning Comments**

Noted. The use and proposals for this area have been reassessed by Inverclyde Council and the outcome of this reassessment will be reflected in the Proposed Plan.

Noted and any reference to the premises will be as the Building Services Depot.

**ID** MR012

**Organisation** The Theatres Trust

**MIR Issues** **Responses**

MI 5 Disappointed that despite the MIR stating shopping and leisure uses are fundamental to town centres,  
MI 6 the chapter, including the questions and options, focuses only on retail. Expect LDP to also deal with the  
MI 7 leisure component for successful town centres and the evening economy in all three towns.

**Planning Comments**

Noted. Retail was the focus of the Main Issues Report as this was felt to be an area of potential change moving from the adopted Local Plan to the Local Development Plan. The Proposed Plan will address town centres in their wider sense, including the role of leisure facilities and the evening economy.

ID MR013

Organisation CB Richard Ellis Ltd

Representing Sanmina SCI

**MIR Issues Responses**

SS Welcomes preferred strategy (para 2.25) with the key aspect affecting Sanmina being the 're-use of brownfield land'. The 19.4ha site is considered appropriate for a housing-led mixed use development.  
MI 1  
MI 14  
MI 15  
SDS Welcome council's approach to negative population growth figures and marginal household increases (para 3.12) and agree that a key approach is through housing led regeneration. The projected household increase should be seen as a guideline rather than a strict figure to be adhered to.

Suggest the Council over allocate land for housing to ensure delivery with possible development problems caused by the present economic climate.

Fully supportive of utilising Spango Valley for housing and community uses and will be willing to work alongside the council to carry out the necessary work to assess this suitability.

Fully support the preferred guiding principles identified in para 3.10 and are of the view that the Sanmina site at Spango Valley will provide an exceptional opportunity to meet many of these principles in one site.

Welcome the identification of the Spango Valley site as a proposed area of change in figure 2B.

Issue 1 - Welcome the recognition of the flexible approach advocated in SPP in relation to employment sites that are no longer found to be appropriate or marketable. The Sanmina site falls into this bracket and we are confident that Inverclyde Council are approaching it in an appropriate way.

Supportive of the council's preferred approach of a comprehensive masterplan covering the whole site including the prison development on the former high school location.

Sanmina are willing to work with the council to address the requirement for further investigation and assessments of the suitability of the site for certain uses. Considers that an initial meeting should be held in terms of how this should be delivered in the long term and who should lead the process. Given the status of the economy, suggest that a broad brush masterplan be put in place to allow a flexible approach to future development and ensuring the most appropriate result is achieved to suit market conditions at the time.

Issue 14 - Disagree with the preferred option and propose that the council does not fully separate affordable from mainstream housing sites. As per PAN 2/2010, of the view that affordable housing should be integrated where possible into the same sites as the mainstream houses. Quote SPP quota approach and national benchmark of 25%. State the figure in Inverclyde should be driven by need and demand in different areas. Highlight Chief Planner's letter to Local Authorities identifying that a flexible approach should be taken which recognises the issues of viability and the availability of funding in the

**Planning Comments**

Noted.

Noted. It is important that the forthcoming LDP continues with the Council and it's Partners' objective of addressing the depopulation of Inverclyde through a policy of housing-led regeneration. The development strategy should remain to meet not only the Authority-generated housing demand but also to provide the conditions for a pleasing environment to attract house buyers from a wider market area. However, projected household formation for Inverclyde and for the wider Glasgow City Region market area are an important element in considering likely housing demand in Inverclyde and to ensure that the housing provision is adequate.

Noted. The Council has consistently over-allocated through the annual housing land supply audit since the adoption of the current Local Plan. There is a more than adequate effective and established land supply to meet the full range of housing demands over the next 10 years in a wide range of sites and locations to cater for different market sectors.

Noted and welcome Sanmina's support in this regard.

Noted.

Noted.

Noted.

Noted.

Noted and would welcome a meeting.

Noted. It is not the intention of the Council to separate affordable housing from mainstream owner-occupied housing. The preferred option is, rather, to identify sites that are best suited for Affordable Housing (comprising social rented, low cost shared ownership and shared equity, and mid market rent), but not to the exclusion of mainstream private sector

current market. Propose therefore that a quota approach be adopted, whilst perhaps considering some council owned land for the potential of delivering affordable housing, but sites identified solely for affordable housing should be small scale and in close proximity to mainstream housing sites.

Issue 15 - This issue considers what action to take on housing sites identified in the 2005 Inverclyde Local Plan which have as yet not been developed. The reason for these sites not yet being developed needs to be considered before deciding what to do with them. If the reason severely affects the future effectiveness of the site, then there is little benefit to be gained from keeping the site designated as a housing development opportunity. If there is still potential for the site to be developed in the next 5 to 10 years, suggest the overarching housing policy across all housing sites with a quota per site for affordable housing. This quota should reflect need and demand and a degree of flexibility recognising potential market driven viability issues.

Chapter 8 - the identification of the Sanmina site as a 'Suggested Area for Change within the Settlement Boundary' in figure 20 (sic.- actually figure 21) is welcomed. It is hoped to work with the Council and other landowners at Spango Valley to ensure that the site becomes effective in a reasonable period of time.

housing. One way of providing affordable homes would be through the quota approach: this and other matters concerning affordable housing provision would be set out in Supplementary Planning Guidance (SPG).

Agreed.

Noted.

**ID** MR014

**Organisation** Inverclyde Council - Environment and Safety

**MIR Issues** **Responses**

SEA

Air quality issues.

Currently 2 locations showing exceedences in NO2 and extra monitoring will be carried out. If the levels continue or increase they will be declared Air Quality Management Areas and a strategy would have to be put in place to reduce them.

Concerned that air has been scoped out of the SEA. Would prefer if air quality could be scoped back in to reflect the slight exceedence currently being experienced. Wording in table 2 should be changed to reflect that certain air quality objectives are not being met.

Suggest Appendix B Environmental Baseline data sources should include a column for Air Quality, with Inverclyde Council as the source.

Suggest Appendix E, Plans, Programmes and Strategies, should include reference at the national level to the Environment Act 1995 Part IV, the Air Quality (Scotland) Regulations 2000, the Air Quality (Scotland) (Amendment) Regulations 2002. At the local level should reference the 2011 Progress Report (once ratified by Scottish Government).

**Planning Comments**

Noted.

Agree that air should be considered in the Environmental Report to accompany the Proposed Plan. Meeting to be arranged to discuss further.

As above.

These documents will be added to Appendix E to acknowledge that air is to be considered in the Environmental Report to accompany the Proposed Plan.

**ID** MR015

**Organisation** Inverkip and Wemyss Bay Community Council

**MIR Issues**

**Responses**

MI 10

Agree with Conservation Area boundary amendments & request affected properties are informed.  
Query population figures used.

**Planning Comments**

Noted and agreed.  
Population figures will be checked.

ID MR016

Organisation Scottish Natural Heritage

MIR Issues	Responses	Planning Comments	
SS	Spatial Strategy - Strongly support preferred approach of sustainability, guiding principles which underlie the Development Strategy and no major release of greenfield for housing. Believe green networks have an important role to play in achieving this aim. Agree Kilmacolm and Quarrier's Village have capacity limits to growth due to landscape character. Welcome safeguarding of coastal location and countryside as assets.	Noted and agreed.	
MI 1			
MI 2			
MI 3			
MI 8			
MI 9		Issue 1 - Agree with preferred approach (Option 2). Recommend local green network is identified as part of masterplan.	Noted.
MI 15			
MI 16		Issue 2 - Proximity of Inchgreen is unlikely to have significant effect on Inner Clyde Estuary SPA.	Agreed.
SDS		Issue 3 - Agree with Preferred Option 2; recommend identification of local green network as initial part of masterplan.	Noted.
MS		Issue 8 - Recommend taking Open Space audit a step further to take account of quality, community value and accessibility.	Agreed. It is proposed to assess each individual site further.
		Issue 9 - Welcome Area Renewal Strategy – suggest extending mapping of green network outside renewal areas.	Noted.
		Reference should be made to the Central Scotland Green Network.	Noted and agreed.
		Issue 15 - Suggest a reduction in the number and/or size of the housing development opportunity sites. Would likely yield environmental benefits particularly when they impact upon SINC's.	Noted.
	Issue 16 - Support Option 1 and suggest a masterplan which first maps the existing green network and then looks for opportunities for linkages.	Noted.	
	Suggested Development Sites - Concern over the impact of a number of development sites on SINC's.	Noted. Will give consideration to nature conservation matters in the Proposed Plan.	
	Monitoring Report - Suggested rewording of Policy UT6.	Agreed.	
	West Renfrew Hills Scenic Area - suggested rewording of Policy HR5.	Noted for Proposed Plan.	

**ID** MR017

**Organisation** Lambert Smith Hampton

**Representing** The Joint Administrators of GWM Balrossie Ltd

**MIR Issues** **Responses**

MI 13 Issue 13 - support the preferred option, option 1.

The emerging plan should consider the codification of criteria against which the assessment of an application for enabling development may be considered. The significance of the heritage asset and the cost of securing a viable and sustainable future against the harm caused by allowing development which would normally be contrary to policy needs to be balanced. The enabling development needs to be commercially viable.

The criteria which needs to be included in the emerging plan relates to the need for planning applications to be supplemented by an assessment of the heritage asset's significance, a condition survey of the asset and a financial development appraisal.

**Planning Comments**

Noted.

Noted.

Noted.



**ID** MR018

**Organisation** Mr Allan Craig

**MIR Issues**      **Responses**

Other

What plans are there for the Hector McNeil baths site and the Murdieston Park area? Both lack investment/maintenance. Understand the baths site is to be used for the people of Greenock and suggest a community learning/sports centre as the Nelson St sport centre severely lacks parking.

West Station area needs tidying up and the pedestrian crossings are dangerous. Propose a peace statue for the Inverkip St/Roxburgh St meeting point in remembrance of the victims of knife crime and to honour John Muirs, whose son was a victim and who has worked in the community to highlight the issue.

What are the plans for the Highlanders Academy and the old Wellington Academy buildings?

**Planning Comments**

Land use policies for each site will be considered in the preparation of the Proposed Plan, and any future proposals will need to accord with them.

The LDP deals with land use policies and does not consider matters of this level of detail.

Land use policies for each site will be considered in the preparation of the Proposed Plan, and any future proposals will need to accord with them.

ID MR019

Organisation Lambert Smith Hampton

Representing Quarriers

**MIR Issues Responses**

SS Concerned LDP MIR does not reference options for delivery of new land for additional mainstream private housing. Cannot simply rely on brownfield regeneration opportunities and ignore delivery of new land for private housing in context of –  
SDS  
HNDA  
MI 14  
MI 15

1. no apparent comprehensive assessment of deliverability of existing supply as per Government requirements set out in SPP to provide range and choice of housing sites and tenures.

2. singular reliance on brownfield development

3. theoretical oversupply of market housing identified in GCVSDP HNDA

4. identified and measurable major backlog in affordable housing provision

5. need to deliver land for affordable housing and the role private housing plays as enabling development in that

Quarriers own land they are prepared to release adjacent to Quarriers Village. This is bounded on three sides by existing development and on the fourth abuts a highway, is in a sustainable and developable location and would accordingly add to the deliverable supply of housing land in Inverclyde.

In terms of Inverclyde Council the HNDA notes "There is a more than sufficient (private) supply in a wide range of localities throughout the urban areas to satisfy private sector requirements".

This policy approach does not preclude identification of local scale housing sites in rural areas to meet local demand and provide a range and choice of housing locations.

In this context, clear that Quarriers Village site is well placed to meet local demand in a sustainable manner.

HNDA also states "The outlook for the owner occupied market at 2020 and 2025 under both scenarios and affordability assumptions is one of modest or no growth" and notes the low rate of household formation coupled with the inability of households to purchase their own homes are the reasons for this conclusion. This analysis is flawed and depends upon an artificially downgraded economic forecast. Provision of housing local residents can afford would, to a great degree, address this issue. This is a fundamental flaw in the LDP MIR document that must be addressed through a policy approach that identifies land for private housing development subject to limitations such as scale and environmental impact.

The land which Quarriers are willing to release would address this particular issue.

LDP identifies a number of housing sites allocated through the adopted Local Plan that have not come forward and MIR expressed a view why. Such sites should be flagged up through the Housing Land Audit process and be identified as constrained as a result. In the same way. SPP supports reallocation of employment land where there is no prospect of take-up the LDP should further examine the deliverability of these housing sites.

**Planning Comments**

Noted. The existing HLS has a mix of brownfield and greenfield housing development opportunities and overall, an adequate effective and established HLS to meet estimated demand for the next 10 years, in accordance with SPP and PAN 2/2010.

Disagree. The most recent HLS Audit (2011) has been undertaken and concluded, as noted above, subject to concluding dialogue with HFS.

Disagree, as above.

Disagree, as above, it is not theoretical, but according to recommended Scottish Government advice, in PAN 2/2010.

Noted.

Noted. This matter is being addressed through the Council's Local Housing Strategy Housing Supply Targets (HSTs) and will find expression in the LDP: Proposed Plan.

Noted. However, while there is no requirement for strategic release, local planning authorities have flexibility through the application of Strategy Support Measure No.10 in the GCVSDP:Proposed Plan.

Noted, as above.

Agreed.

Noted. It would be helpful to have evidence presented to substantiate this claim.

Disagree. Evidence to substantiate this claim would be welcomed.

Noted.

Noted. The role of the HLS Audit assists in this annual examination and that is why it has been raised as an issue in the MIR.

MIR does not provide enough detail or allow discussion on options available for Green Belt Development. Whilst clearly little support for Green Belt development, acknowledges is a Council wide affordable housing shortfall that should be met locally. Delivery of affordable housing as part of a mixed development including private housing would be a sustainable solution in the case of the Quarriers Village. MIR notes strategic policy position would allow limited incursions into Green Belt to meet that shortfall, albeit in part, but does not discuss or promote options that would address that. Green Belt is a land use planning policy designation, not fundamentally an environmental protection tool. Accordingly, should Councils need or wish to allocate land for development in the Green Belt then, subject to caveats in SPP, they are entitled to do so.

Noted. The preferred option in terms of the overall Development (or Spatial) Strategy is set out in the MIR, with a reasoned justification. That does not preclude some adjustments to the inner Green Belt boundary to allow for local needs and demands, an approach now formalised through SSM No.10 in the SDP:Proposed Plan.

Note: representations received are in large part, identical to MR024 (see below).

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**ID** MR020

**Organisation**

Savills

**Representing**

Ardgowan Estate

**MIR Issues**

**Responses**

MI 1  
MI 8  
MI 9  
MI 13  
SDS

Support for policy which provides for a wide range and scale of renewable energy.

Issue 1 - request masterplan area is extended to include land to SW of the site (Dunrod West, Spango Valley).

Issue 8 - Support Preferred Option 2.

Issue 9 - Support Preferred Option 1.

Issue 13 - Support Option 2; would welcome discussion on Policy.

Potential development sites - Whilst it is acknowledged that the MIR states that there is no requirement for major greenfield release, small scale adjustments to meet local demands and needs form part of the overall settlement strategy. Ardgowan Estate therefore wish to take the opportunity of the MIR to propose the following sites for development. It is considered that these sites would meet the tests of effective housing sites as set out in paragraph 55 of Planning Advice Note 2/2010 'Affordable Housing and Housing Land Audits. The Estate would welcome further discussion with the Council regarding the following sites: Berfern, Inverkip; Finnock Bog Farm East, Inverkip; Flatterton; Dougliehill, Greenock.

Land at Bankfoot Farm near Inverkip should be considered for a development allocation in the forthcoming Plan. An opportunity exists for a mixed retail and commercial development, whilst retaining the residential element. The retail and commercial element could incorporate a Scottish Rural and Farm Produce visitor centre, with an associated tourism retail and food development.

**Planning Comments**

Noted.

Noted. The site submitted will be given full consideration and consultation in the preparation of the Proposed Plan.

Noted.

Noted.

Noted. Would welcome further discussions.

Agreed. The MIR has indicated consideration will be given to augmenting the HLS with some selected release of smaller sites, as does the GCV SDP:Proposed Plan through the flexibility afforded local planning authorities in Strategy Support Measure No.10 in the Proposed Plan. The sites submitted will be given full consideration and consultation in the preparation of the Proposed Plan.

Noted.

ID MR021

Organisation SPT

MIR Issues	Responses	Planning Comments
SS	Support Council's preferred approach to the development strategy.	Noted.
MI 1	Serious concerns regarding some suggested development sites in alternative strategy.	
MI 3	Main Issue 1 - agree with preferred option. Masterplan must consider sustainable access issues, particularly in relation to residential development proposals.	Noted.
MI 4		
MI 5	Main Issue 3 - support either of the Council's preferred options.	Noted.
MI 6		
MI 7	Main Issue 4 - Support preferred option, would suggest there be a presumption against development that will result in large scale trip generation by car.	Noted.
MI 8		
MI 9	Seek clarification regarding site to be designated for general and those for flexible business and industry as not clearly identified in figure 6.	Noted. Will be clarified in Proposed Plan.
MI 15		
MI 16	Essential the LDP provides safeguarding for future operational needs of Ocean Terminal.	Noted.
MI 17	Town Centres - suggest issues identified could have usefully provided reference to the wider role of town centres in terms of commercial uses and transport hubs.	Noted. The wider role and function of Town Centres beyond retailing will be discussed in the Proposed Plan.
SDS	Main Issue 5 - Support Council's preferred options for the Central Shopping Area and the Primary Shopping Area boundaries.	Noted.
SEA	Suggest mechanisms are taken forward to integrate the West Station area into the wider Town Centre area. The improved bus station and train station mean this area enjoys good transport accessibility and provides a gateway to the Town Centre.	Noted and agreed.
	Main Issue 6 - Some concerns about the preferred options. Feel inclusion of part or all of the site within the Town Centre boundary would be detrimental to the existing town centre and would be likely to encourage unsustainable travel patterns given the limited pedestrian access to the rail and bus stations.	Noted.
	Main Issue 7 - Would seem prudent to protect the proposed relief road route from potential development that could prohibit future construction.	Noted.
	Main Issue 8 - Support option 2, provided a full assessment of the role and quality of the sites as well as alternative uses is carried out. The role of open spaces in the urban area to provide pedestrian and cycle ways must also be carefully considered.	Noted and agreed.
	Main Issue 9 -Would welcome proposals that would apply the principles of the 'erz' report in terms of accessibility, to all new development.	Noted.
	Main Issue 15 - Significant concerns regarding sustainable access to some of the housing opportunity sites identified as are remote from bus corridors. Would welcome the opportunity to further review these sites and discuss concerns.	Noted. Offer of further discussions welcomed.
	Main Issue 16 - Support Council's preferred option.	Noted.
	Main Issue 17 - Support Council's preferred option.	Noted.
	Suggested Development Sites - as above concerns with accessibility of some sites and would welcome the opportunity to discuss this further in terms of the likelihood of bus access for each, should the Council consider including any within the Proposed Plan.	Noted. Offer of further discussions welcomed.
	Monitoring Statement - suggest removal of Glasgow Central to Kilmacolm Railway line from schedule of opportunities.	Noted.

Request new bus interchange in Greenock and bus station at Port Glasgow are safeguarded as transport infrastructure. Would also like further engagement on the opportunity to safeguard other key interchange points, bus turning circles and bus depots and park and ride opportunities.

Noted. Offer of further engagement welcomed.

SEA - Strathclyde Passenger Transport should be amended to Strathclyde Partnership for Transport.

Noted. Will amend for Proposed Plan and SEA.

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**ID** MR022

**Organisation** GVA Grimley

**Representing** Aldi Stores Ltd

**MIR Issues** **Responses**

MI 5 October 2010 pre-MIR submission remains Aldi's position and should be read alongside this submission.

Would like to engage in dialogue about the tiered town centre policy and the inclusion of predominantly residential areas within the town centre boundary. Feel that the inner/outer distinction, with sub-areas subject to different policies runs counter to the guidance set out in SPP. An alternative approach, with a town centre boundary better reflecting the functional nature of the town centre and treated holistically from a policy perspective, would provide a more appropriate basis for town centre policy in Greenock. Thereafter, the town centre boundary should be revised to include the area identified as sub division G in the MIR, or any of the three options (a, b or c of Option 3). This would provide a more accurate town centre boundary within which investment in town centre uses and functions could be directed.

Aldi's site at Ker Street should be identified as a retail development opportunity site within a consolidated town centre boundary. If the council continues with a tiered town centre with sub-areas, the Central Shopping Area boundary should be amended to include the Ker Street site, as per Option 3.

Other comments from 2010 submission: Should recognise the SDP MIR's identification of Greenock as a strategic town centre, place it at the top of the retail hierarchy, and adopt a qualitative approach to assessing proposals for new retail development in Greenock town centre in accordance with that strategic role.

**Planning Comments**

Pre-MIR submission comments will be taken into account - see below.

Noted. Development of town centre policy for the LDP will be undertaken in light of representations and in the context of national and strategic policy.

Noted. See above.

The LDP will be developed within the framework of the SDP. As above, town centre policy will be developed in the context of national and strategic policy.

**ID** MR023

**Organisation** Montagu Evans LLP

**Representing** NHS GG&CV (Ravenscraig Hospital)

**MIR Issues** **Responses**

SDS It is anticipated that Ravenscraig Hospital will close around the end of 2013 and will then be surplus to requirements. It is considered suitable for redevelopment and should be allocated for residential development in the emerging LDP.

In addition to contributing to housing supply, site represents a classic urban brownfield opportunity which, if allocated for housing, will help relieve pressure on less sustainable or sequentially preferable greenfield sites.

**Planning Comments**

The site is mainly within the settlement boundary and is currently identified in the adopted Inverclyde Local Plan under Policy H1 'Safeguarding the Character and Amenity of Residential Areas' and Policy H5 'Housing Development Opportunities'.

Noted and agreed.

ID MR024

Organisation PPCA Ltd

Representing Mactaggart & Mickel Homes Ltd

**MIR Issues Responses**

SS Land requires to be allocated for new housing supply.

MI 8  
MI 14  
MI 15  
HNDA

Spatial strategy accepts population decrease will mean existing allocations are sufficient to meet demand, and sites suggested are greenfield and inherently unsustainable. This is considered to be an unnecessarily negative view.

Support for brownfield development in principle acceptable but, to the complete exclusion of greenfield opportunities is wholly unacceptable given requirement in SPP to provide a full range and choice of housing sites and tenures.

Wrong for MIR to state Kilmacolm has insufficient infrastructure to deal with further allocations. If this is a reference to public transport only, new development will help resolve that issue. There are no other restrictions that would prevent new housing development.

Issue 8 - support option 2

Chapter 7 - Housing:  
Significant concerns the MIR does not make any reference to options for delivery of new land for additional mainstream private housing. Cannot simply rely on brownfield regeneration opportunities in the context of: SPP requirements; a singular reliance on brownfield development; a theoretical oversupply of market housing identified in the HNDA; an identified and measurable major backlog in affordable housing provision; the need to deliver land for affordable housing and the role that private housing plays as enabling development in that; no apparent comprehensive assessment of the deliverability of the existing supply and; disappointed sites identified on page 57 have shown little indication of being delivered.

HNDA notes there is enough land to meet private sector requirements across the urban area. This does not preclude identification of local scale housing sites in rural areas to meet local demand and provide a range and choice of housing locations. HNDA also states that, for both scenarios, the outlook for the owner occupied market is modest of no growth, due to low rate of household formation and the inability of households to purchase their own homes. This misses the point, provision of housing that local residents can afford would address this issue. This is a fundamental flaw in the LDP MIR that must be addressed through a policy approach that identifies land for private housing development subject to limitations such as scale and environmental impact.

Issue 14 - meeting SPP commitment to increase supply of new homes will necessitate release of greenfield land for development that can be achieved in a sustainable manner. Support preferred option to meet the affordable housing requirement in full. However, it must be recognised that market housing can often act as enabling development to fund new affordable housing. To fully achieve the target set in the LDP for delivery of affordable housing, the Plan must allocate land for market housing to support this.

Issue 15 - Simply re-allocating problem sites for affordable housing does not necessarily address the deliverability issues associated with the sites.

**Planning Comments**

Noted. The GCV SDPA in their Proposed Plan (June 2011) has concluded that there is no strategic requirement to expand the supply of land for private sector housing, to either 2020 or 2025.

Noted.

Noted. However, the Housing Land Supply Audit 2011 demonstrates that there are greenfield development opportunities and in the Council's opinion, there is a full range and choice of housing sites in accordance with SPP.

Noted, and will provide further background technical information to support the reasoned justification in advance of the recommended housing development strategy in the Proposed Plan.

Noted.

Representations made are in large part identical to MR019. See Planning Comments above.

Representations made are in large part identical to MR019. See Planning Comments above.

Noted, but refer to 2006 JSP SP 9(A)(iii), where exceptional release from the Green Belt can be made for the sole purpose of meeting an identifiable need through the provision of affordable homes.

Noted. This is not suggested: rather that each of these sites should be reviewed in the light of existing and projected demand/need in the housing market, otherwise there is little likelihood of development in the next 10 years.

Green Belt - MIR does not provide enough detail or allow discussion on options available for Green Belt development. Clear there is little support for development in the Green Belt and acknowledges there is a Council wide affordable housing shortfall that should be met locally. Notes there is a strategic policy position that would allow limited incursions into Green Belt to meet that shortfall, albeit in part, but does not discuss or promote options that would address that. Considered to be a failing of the document.

Representations made are in large part identical to MR019. See Planning Comments above.

Sites for development 8, 9 & 10 - Landscape analysis, opportunities and constraints plan and an overall indicative development structure have been provided for sites to be developed together in a phased approach or as stand alone proposals.

Noted.

Development of sites creates a natural extension to Kilmacolm and provides the opportunity to establish a long term defensible boundary without having a negative impact on the landscape or visual setting. Residential development will also have minimal impact on Green Belt objectives by forming a natural extension to the development fingers while not effecting the green wedges that come into the heart of the village, maintaining green links.

Noted.

Sites are wholly effective and deliverable for both mainstream and affordable housing.

Disagree. Further to the strategic position noted above, with reference to the situation in Kilmacolm, the HNDA indicates there could be a problem of housing provision for the affordable sector and this is being considered through the Council's forthcoming Local Housing Strategy and will be addressed in the forthcoming Proposed Plan.



ID MR025

Organisation The Scottish Government

MIR Issues	Responses	Planning Comments
MS	Includes responses from Transport Scotland and Historic Scotland.	Noted.
MI 1	Monitoring Statement - could have referred to the Zero Waste Plan, The Flood Risk Management (Scotland) Act 2009, the National Renewables Infrastructure Plan and the Scottish Renewables Action Plan alongside the implications they have upon Inverclyde.	Noted, but these documents are referred to in the MIR and relevant Background Reports.
MI 2		
MI 3		
MI 4		
MI 5	The LDP should not be submitted to Ministers until the GCVSDP has been approved.	Noted and agreed in relation to the Proposed Plan.
MI 6		
MI 7	Note the Government has increased its target for renewable sources to generate the equivalent of 100% of gross annual electricity consumption and 11% of heat consumption by 2020.	Noted.
MI 8		
MI 9	Encourage continued engagement with the Government and its agencies as the plan progresses.	Agreed.
MI 11		
MI 12	Note issues 3, 6 & 8 have no preferred option but instead 2 preferred alternatives. The reasoning for this is not made clear and would welcome further discussion on the matter.	Noted and would welcome further discussion.
MI 13		
MI 14		
MI 15	Issue 1 - Transport Scotland wishes to provide input to any masterplan process.	Noted.
MI 16		
MI 17	Issue 2 - Should be continued engagement with Transport Scotland on trunk road access.	Noted and agreed.
HNDA		
SDS	Issue 4 - Transport Scotland wish to continue engagement on the potential impact of the identified developments along the A8 corridor.	Noted.
	Issues - 5, 6 & 7 welcome reference to SPP and the intention of the LDP to support and enhance Inverclyde's town centres.	Noted.
	Issues - 8 & 9 In taking forward the Proposed Plan and the green network strategy the Council should be aware of the full range of benefits that green networks, green infrastructure and open spaces provide.	Noted and agreed.
	Issues 11 & 12 - Proposed designations are welcomed. Consideration should be given to establishing a Conservation Area around the high quality 19th century villa developments in Kilmacolm, particularly those in the vicinity of Park Road and St Columba's School. Ongoing work in relation to Conservation Area Appraisals is encouraged in order to identify the special interest and changing needs of Conservation Areas and provide a basis for development which is sensitive to the historic area and avoids deterioration.	Noted.
	Issue 13 - Principle of a policy applied in exceptional circumstances would be welcomed. Further consideration should be given to option 2 because buildings at risk are the most likely to require some enabling developments.	Noted.
	Historic Scotland would welcome the opportunity to provide advice on the wording of any drafted policy prior to the PP.	Noted and welcome.
	Issue 14 - would have benefited from greater reference to the key outcomes and figures from the HNDA and how these relate to issues 14 & 15. Not clear that a generous supply of housing land exists, and would welcome further discussion with the Council on this aspect.	The HNDA outcomes of relevance to Inverclyde are fully outlined in Chapter 2. Background Report on the 'Housing Land Supply Audit 2010' provides the evidence for this statement.
	Consideration should be given to whether a quota style affordable housing policy would be beneficial in Kilmacolm and Quarriers HMAs.	Noted and agreed.
	Preferred option to distinguish affordable sites from mainstream private sites in the LDP may conflict with the Government's objective of creating successful places and achieving quality residential environments, which is based on an integrated mix of land uses including well designed homes of	Noted. It is not our intention to have single tenure development on different sites, but to proceed on the basis of mixed communities as per SPP. However, the provision of

different types and tenures.

Issue 15 - Advise the Council to carefully consider sites with little development interest and the actions they could take to remove barriers to their development. References Chief Planners letter of Oct 2010.

As these sites have been in the established supply for some time, and considering the current economic climate, consideration should be given to de-allocating or removing the least attractive and unsustainable sites in the LDP and releasing alternative sites that may be of greater interest to the market.

Suggest the Council consider a mixture of options 1, 3 and 4 as imposing an affordable housing requirement may not increase the likelihood of the sites being developed.

Issues 16 & 17 - PP should identify the potential nature and scale of impact of development upon the strategic road network, including the A8 and the A8/A761 roundabout.

Housing comments: Issues 3, 7 and 16 - potential impact of housing development as part of these sites on overall housing supply or need figures needs to be considered if these sites are taken forward in the PP.

Should consider whether the findings of the HNDA require the housing needs of gypsies, travellers and travelling showpeople to be addressed in the PP.

Waste - PP should seek to address all waste management infrastructure and waste within all new developments in accordance with SPP and Annex B of the Zero Waste Plan.

Minerals - should be considered in greater detail in the PP.

Renewables - interim statement and SPG should be incorporated into the LDP.

In taking forward the PP should refer to the '2020 routemap for renewable energy in Scotland.

Heat Mapping - points to resources to assist in spatial planning for renewable heat.

LDPs are required to contain policies on greenhouse gas emissions which require low and zero-carbon generating technology to provide a specified and rising proportion of greenhouse gas emissions avoidance from buildings in use. Greater clarification is required in relation to the Council's approach.

Historic Scotland comments on suggested sites:

East of Former BoW Hospital (housing) - Development on this site may affect the setting of Hope Lodge, therefore consideration should be given as to how this might best be mitigated.

Milton Wood, Lochwinnoch Road (housing and school extension) - Agree should not be a preferred option site as have concerns about impact on Duchal House designed landscape. If considered further, potential impacts should be considered in detail.

Balrossie (enabling development) - welcome proposals to find a sustainable reuse of buildings. Development should be located sensitively in relation to the historic building.

Fort Matilda Industrial Estate (redevelopment opportunity) - Content provided there is a presumption in favour of protecting listed buildings.

land for affordable housing is predominantly a matter of scale and importantly, it has to relate to what is on the ground and to sites that are available and/or allocated in the Plan.

Noted and agreed.

Noted and agreed.

Noted and agreed.

Noted and agreed.

Noted.

The HNDA outcomes with respect to the needs of gypsies, travellers and travelling showpeople are being considered by the Council through the LHS, and will, if required, be addressed in the forthcoming Proposed Plan.

Noted.

Noted.

Noted.

Noted.

Noted.

Noted.

Noted.

Noted.

Noted.

**ID** MR026

**Organisation** McInally Associates

**Representing** Peel Ports

**MIR Issues Responses**

MI 2 The importance of Greenock Ocean Terminal should be recognised within the emerging LDP as a  
MI 5 generator of economic growth and employment as well as its potential, as benefits are likely to increase as the number of ships and passengers increase. The LP should highlight the need for an improved embarkation point for cruise ships. In this regard seek the assistance of the LP in encouraging new opportunities for investment which would assist improvements to the Cruise Ship facilities.

Issue 2 - In broad agreement with the Council's preferred option. However, it is considered important that the designation at Inchgreen should not exclusively be reliant upon green technologies and allow for a wider range of uses to be accommodated. Envisage the site would complement and operate together with the site at Hunterston promoting green and renewable technologies.

Issue 5 - In broad agreement with the Council's preferred option. Central Shopping Area should be extended to include Morrisons to the east. Combined with the extension of the boundary west to include Campbell Street would widen the primary shopping designation and support retailing on Brougham Street. Suggest the CSA should also be extended to include the area to the north of the A8, to include Custom House and Harbour areas, therefore helping to promote the continued regeneration of the riverside and encourage activity on the waterfront. Inclusion would assist in improving the waterfront as a destination for residents and visitors alike.

**Planning Comments**

Noted. While this matter was not considered as a new 'main issue', it will be addressed in the Proposed Plan. The current adopted Inverclyde Local Plan 2005 recognises Greenock Ocean Terminal as a Strategic Employment Location and its recognition as such and protection given to it will continue in the new Local Development Plan (LDP). In line with the Glasgow and the Clyde Valley Strategic Development Plan (GCVSDP), with which the Local Development Plan has to comply, Greenock Ocean Terminal is designated as a Strategic Freight Transport Hub and its status as a strategic employment location remains.

Noted and agreed. The Council's preference is for green and renewable technology businesses to be located at Inchgreen, but this should not be to the exclusion of other suitable business and industrial uses. Would welcome further discussion with Peel Ports and other interested parties in advance of the Proposed Plan.

Noted. The role and function of the sub areas within the existing town centre will be given full consideration in the preparation of the Proposed Plan.

ID MR027

Organisation Tesco Stores Limited

**MIR Issues**

**Responses**

**Planning Comments**

MI 6	<p>The Tesco store in Port Glasgow Town Centre functions as part of the Town Centre, the linkages are well used to the benefit of the vitality and viability of the shops and services in the area and it has been successful in retaining activity and spending within Port Glasgow.</p> <p>Issue 6 - prefer option 2 as the area north of Ardgowan Street is characteristic of a commercial centre designation, in that it is restricted in the range of goods that can be sold.</p> <p>Allocation of the site as town centre would facilitate expansion of a wider range of retailing, including food, on the site when there has been no assessment provided on whether there is a qualitative or quantitative deficiency in food retailing within the Port Glasgow area or other sequentially preferable sites, as required by Scottish Planning Policy. Therefore believe there is insufficient justification for the allocation as town centre.</p> <p>Allocation as town centre would increase the area that can then be classed as edge-of-centre, which is afforded status in the sequential approach.</p> <p>In addition, the area in question does not benefit from strong pedestrian linkages to the historic core of the town centre.</p> <p>Allocation as a commercial centre reflects the characteristics of the extant consent and will protect the vitality and viability of Port Glasgow.</p> <p>A commercial centre allocation provides the policy framework to allow the development of the site to proceed when market conditions improve and the realisation of the resultant investment and jobs, while at the same time protecting the existing investment and jobs within the town centre.</p>	<p>Agree that the store functions as part of the Town Centre</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
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ID MR028

Organisation SportScotland

MIR Issues	Responses	Planning Comments
MI 1	Suggest stronger worded policy for protection of CMRP	Noted.
MI 8	Issue 1 - Support Preferred Option 2. Any masterplan should encourage sport and physical recreation.	Noted.
MI 9	New development should integrate with access rights and core paths networks.	
SDS	New development will have implications for the demand for sports facilities and could potentially create the need for new ones. LDP should assess this, sportscotland's Facility Planning Model can assist. Relevant to sites in Greenock Central East Study Area.	Noted.
	Issue 8 - Clarification of definition of Open Space required; and recognition of importance of rural outdoor resources and need for justification for loss of pitches/ formal areas.	Agreed.
	School open space should be included.	Agreed.
	Issue 9 - Support Preferred Option 1 subject to justification of loss of areas.	Noted.
	Chapter 8: Suggested Development Sites - Concerned impact upon opportunities for sport and recreation has not been used as an assessment criterion. Recommend sites reviewed to ensure potential impacts on existing sport and recreation interests in the green belt and opportunities for further provision are considered.	Noted.
	Comments from Pre-MIR submission still stand.	Noted.

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**ID** MR029

**Organisation** DPP LLP

**Representing** Ashcap (CNC) LLP

**MIR Issues** **Responses**

SDS Wish to continue to promote site at Fort Matilda Industrial Estate as a potential redevelopment opportunity within the emerging LDP.

Request that the range of uses considered appropriate is widened in order to enable greater diversification.

**Planning Comments**

Noted.

Noted.

**ID** MR030

**Organisation** DPP LLP

**Representing** Highcross Strategic Advisors

**MIR Issues** **Responses**

MI 1

Issue 1 - Support identification of Spango Valley as a 'Proposed Area of Change' in the MIR. Also support Council's acknowledgement that it should be considered for mixed use development including business, housing and commercial uses. Therefore recommend Highcross' development site is allocated for such development purposes in the forthcoming PP.

Support option 2 that the area as a whole be subject of a masterplan to address the proposed prison site, remaining business uses and vacant land within the site.

Site accessible and well connected by both road network and public transport as well as a network of cycle routes and pedestrian footpaths.

Propose to make appropriate provision of affordable housing on the site, contributing to meeting established need.

Housing development will act as enabling development to allow for the continued investment into the rest of Valley Park.

It is Highcross' intention to submit a planning application for development within their site at the appropriate stage of the LDP.

**Planning Comments**

Noted and welcome support.

Noted.

Noted.

Noted.

Noted.

Noted.

**ID** MR031

**Organisation** 2020 Renewables

**MIR Issues**

**Responses**

MI 2

Renewable energy - LDP should address promotion and development of strategic, commercial scale renewable projects.

Unambiguous criteria and clear planning & development guidelines are required.

There are no details in the MIR of the role of renewables in Inverclyde.

Despite promoting Inverclyde as a renewable energy hub there are no details in the MIR or SEA of potential strategic development plans for the deployment of renewable businesses and projects; suggested inclusions.

The MIR and LDP should actively promote and deliver strategic objectives in relation to the renewable sector.

The wording of the criteria in Policies DS10 and UT6 should be less ambiguous to be less restrictive on measurements of impact. Criteria to be amended & suggested wording are provided.

**Planning Comments**

Noted.

Noted.

This will be addressed in the Proposed Plan as renewables were not considered to be a new 'main issue' for the MIR.

Noted. These matters will be addressed within the Proposed Plan.

Noted.

Agreed. Will consider for inclusion in the Proposed Plan.



**ID** MR032

**Organisation** West of Scotland Archaeology Service

**MIR Issues**

**Responses**

SDS

No specific comments to make.

Chapter 8 - suggested development sites were assessed and a list provided where there may be potential archaeological issues.

**Planning Comments**

Noted.

Noted and welcome information provided.

**ID** MR033

**Organisation** Turley Associates

**Representing** ScottishPower Generation Ltd (Inverkip Power Stn)

**MIR Issues** **Responses**

Other Inverkip Power Station site should continue to be safeguarded for mixed use development within the emerging LDP. The current planning application has been prepared in response to current Plan policy and through engagement with the local community and other key stakeholders.

**Planning Comments**

Noted. The site is within a mixed use policy area in the adopted Local Plan and is the subject of a current planning in principle application for a mixed use 'Urban Village' development including residential, business, community use and small scale retail.

**ID** MR034

**Organisation** Ms Claire Duffy

**MIR Issues** **Responses**

Other Question cost of providing dog waste/litter bins in Drumfrochar Road, Greenock rather than money being spent on public art for tourists.

**Planning Comments**

The LDP deals with land use policy and not matters of this level of detail.

**ID** MR035

**Organisation** Scottish Water

<b>MIR Issues</b>	<b>Responses</b>	<b>Planning Comments</b>
SDS	Broadly welcome the concepts and goals referred to within the document.	Noted.
	Insufficient network capacity should not be seen as a barrier to development. Can provide new strategic infrastructure where development meets certain rules/criteria. Developers should be aware of this and encouraged to engage at their earliest opportunity. Developers will be required to fund this.	Noted.
	Reiterate support for use of SUDS and encourage all developers to incorporate such systems wherever possible within their designs.	Noted.

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**ID** MR036

**Organisation** Savills

**Representing** Cloch Caravans

**MIR Issues**

**Responses**

**Planning Comments**

SDS

Cloch Road, Gourock

GBR

Suggest site for inclusion in LDP for medium density residential development. Map attached.

Noted.

Planning history of site exhibits intention of landowner to effectively develop the land. With expansion of Gourock to include Faulds Park, site should now be considered as an appropriate gap site in the expansion of Gourock.

Noted.

Site would not currently be considered a defensible boundary of the settlement in landscape terms. Appropriate defined boundary would be raised land and woodland at Cloch Caravans, development of site would bring settlement boundary of the site up to this point.

Noted.

No archaeological or flooding issues have been identified on the site.

Noted.

ID MR037

Organisation RSPB Scotland

**MIR Issues**

**Responses**

**Planning Comments**

SS	Ch.2 & Ch. 3 contents welcomed.	Noted.
SEA	Issue 2 - Impact of development on biodiversity & birds has not been noted in the MIR or SEA.	Noted.
MI 7	Issue 7 - Concern over adverse impact of route on intertidal habitat therefore support Option 2.	Noted.
MI 8	Ch. 6 Omission of policies on biodiversity, Natura 2000 sites, local designations.	Noted. These policies will be considered in the Proposed Plan.
MI 9	Recommend a policy on peat protection.	Noted.
	Biodiversity should be added as a criterion for protection of open space.	Agreed.
	The importance of rural parts of Inverclyde for biodiversity should be included.	Noted.
	Issue 9 - Reference should be made to the Central Scotland Green Network and its benefits.	Agreed.
	A Green Network Policy and Map for Inverclyde should be included.	Noted.
	Main Issue 7 and Main Issue 9 have not been fully informed by the SEA process.	Noted.
	More detail could have been provided on the impact of development on the SPA but this can be carried out through the HRA of the LDP.	Noted.
	SEA - Birds Directive and Habitats Directive would be best listed under European as opposed to National.	Agreed.
	Concern is likely over suggested development sites containing SINCs.	Noted.

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ID MR038

Organisation Renfrewshire Council

MIR Issues	Responses	Planning Comments
SS HNDA GBR MI 2	Agree policies in the adopted LP to support the land use strategy for Inverclyde remain relevant and valid.	Noted.
	Welcome approach of no strategic release of Greenfield land for housing. In particular, the HNDA indicated no justification for major new housing development within the Inverclyde part of the Renfrewshire Sub Market Area.	Noted and welcome.
	No concerns over greenbelt adjustments.	Noted.
	Welcome further partnership working to protect, maintain and enhance the Clyde Muirshiel Regional Park and Renfrewshire Heights areas.	Noted and welcome.
	Issue 2 - support option 1. Given the new green energy employment opportunities announced earlier this year at Doosan and Westway in Renfrew, consider the joined-up approach would help deliver Strategy Support Measure 15 in the SDP PP. SEIL at Glasgow International Airport Zone would also be able to support Inverclyde's role within the renewable industry.	Noted.
	Disagree Bishopton CGA has been 'seriously' curtailed, preparatory work commended at the beginning of the year and a revised phasing plan indicates the commencement of phase 1 in 2012.	Noted.

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**ID** MR039

**Organisation** GVA

**Representing** Wm Morrison Supermarkets Plc

**MIR Issues** **Responses**

MI 5 Support the preferred option to extend the central shopping area to include the Morrisons store.

**Planning Comments**

Noted.



**ID** MR040

**Organisation** Mr Jim Madden

**MIR Issues** **Responses**

SDS

Former Quarry, Port Glasgow Road, Kilmacolm

The statement in the Suggested Development Sites Background Report on landscape is taken from the Scottish Executive Reporters reports of 2002 and 2004. The landscape is now different and such statements should be reviewed and revised in line with these.

2002 and 2004 Reporters reports are in conflict over site being classed as ribbon development. Why is this site classed as ribbon development when the 'plots' site is not?

Where does limited visibility statement in background report come from? Roads department fully support and have no objections to proposed site access as all legal and statutory requirements can be met.

The site's merits need to be independently evaluated, and this would identify that the site does not contribute to the greenbelt, it is not suitable for agriculture, forestry or recreational requirements.

A note from the Kilmacolm Community Council minutes stated that it would not oppose the erection of three dwelling houses at the disused quarry site.

**Planning Comments**

Noted.

The former quarry site would be classed as 'ribbon development' because it further extends the settlement boundary along a road, while the 'plots' site is located between existing houses,

The statement in the Suggested Development Sites report makes it clear that, even though the site has limited visibility, access to the site is acceptable. This information was obtained in discussion with the Council's Environment and Commercial Services (Roads).

Should this matter not be resolved in advance of the publication of the Proposed Plan, in accordance with planning legislation, Scottish Ministers will appoint a person to conduct an Examination into the Plan.

Noted.

ID MR041

Organisation SEPA

Representing N/A

**MIR Issues**

**Responses**

SS  
MI 1  
MI 2  
MI 4  
MI 5  
MI 6  
MI 7  
MI 8  
MI 9  
MI 15  
MI 17

Emerging LDP needs to recognise and take cognisance of the changes to national policy regarding waste and, in particular the objectives of the Zero Waste Plan and how this will impact on the existing waste management strategy for Inverclyde. This is likely to create significant changes. We would be happy to advise further on this matter following any supplementary advice from the Scottish Government.

Waste and water management is not a standalone issue - it is linked to climate change, economic, energy and infrastructure issues, and links between these topics should be made within the new Development Plan. The opportunity to link energy, heat and waste should be taken when developing policy. It is crucial to the delivery of the Zero Waste Plan to ensure that sustainable waste management is fully considered in all new development and it is important for waste management and recycling to be 'built in' to development as early as possible.

Encourage a link to be made between flooding and climate change and that a policy on planning for flooding and climate change may be worthy of further consideration.

Highlight that hydro schemes potentially have implications with regard to the consentability regime of The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR). The construction of engineering structures in the water environment also have the potential to downgrade the status of the waterbody and therefore may be contrary to the aims of the Clyde Area Management Plan 2010-2015.

Flooding section should be split into Flooding and 'The Water Environment'. Recommend some changes in, and additional, wording for the flooding and water environment sections.

Supportive of the rationale behind the preferred development strategy and agree green belt release should be minimised.

Keen to support the appropriate locations selected for Business and Industrial premises, particularly if this relates to the construction of new waste infrastructure facilities.

Main Issue 1 - supportive of preferred option (2), however, would request assurances that all potential infrastructure constraints will be fully investigated as part of the comprehensive masterplan process.

Main Issue 2 - Supportive of preferred approach (Option 1) provided that the developments along the waterfront are not in conflict with aims of Water Framework Directive.

Main Issue 4 - happy to support Option 1, however highlight the 'Use Class' can have implications to the interests of some of the statutory consultees.

Main Issues 5-7 - Not within SEPA's remit so no comments on preferred options. Reiterate that any new roads constructed would require to comply with the terms of The Water Environment (Controlled Activities) (Scotland) Regulations 2011.

Expansion or reconfiguration of the town centres may require to give some consideration of other environmental factors, such as air quality. This may require further discussion if traffic patterns are likely to change as this may have implications for air quality, emissions and climate change etc.

Request in 6.2 Natural Environment that add: reference to protection of water environment overall, including, but not solely restricted to designated sites; wording to reflect requirement to protect and enhance the water environment, including water dependent protected areas, etc and; reference to the presence of aquatic and riparian invasive non-native species (INNS) and the requirement to protect and improve water bodies at risk or impacted by them.

**Planning Comments**

Noted. Waste will be addressed in the Proposed Plan. Would welcome further discussions.

Noted, will be taken forward in the Proposed Plan.

Noted.

Noted.

Noted. Will be taken forward through the Proposed Plan.

Noted.

Noted.

Noted. Agree infrastructure issues should be considered in the masterplan process and will consult throughout.

Noted. The aims of the WFD will be taken into account.

Noted.

Noted.

Noted. The implications of changes to the town centres will be consulted upon.

Noted. The water environment and its protection will be dealt with in more depth at the Proposed Plan stage, where these comments will be considered.

Supportive of the recognition that areas of peatland need to be given added level of protection, particularly where not covered by other designations.

Noted.

Main Issue 8 - some concerns with Option 2 as often these open spaces may provide other benefits. The overall benefits need to be considered before changing the use of existing open areas. Should consider developing open spaces which serve multiple benefits especially along watercourses, should also maintain open spaces for other values apart from visual or recreational use. Requirement to ensure no deterioration of watercourse in open areas, protect any open spaces which are put forward for development including up and downstream impacts on the watercourses. Option 3 could therefore be considered with a view to the future.

Noted and welcome comments.

Main Issue 9 - Supportive of Option 1. Advise that the LDP should also encourage networks along watercourses "blue networks" including taking opportunities for habitat enhancement along watercourses – amenity value, etc.

Noted.

Main Issue 15 - Provided greenbelt expansion is minimised, satisfied with Preferred Option.

Noted.

Main Issue 17 - Content to let matters rest with Inverclyde Council, however would expect all relevant environmental considerations to be a fundamental aspect of any ensuing materplanning process for all of the sites being studied further.

Noted Masterplans will be subject to EIA and will take all relevant environmental considerations into account.

Suggest that under Environment a reference should be made to the River Basin Management Plan for the Scotland River Basin District and to the Clyde Area Management Plan.

Noted. The Scotland RBMP and the Clyde Area RBMP will be taken into account in the development of the Proposed Plan.

Provide background information on the ecological status of baseline water bodies.

Noted. Information provided welcomed.

State that opportunities should be taken to enhance water body ecological status, biodiversity and habitat as part of all developments which impinge directly or indirectly on neighbouring water bodies and provides list of opportunities that should be taken.

Noted. The impact of development on water body status will be considered and the provision of information on available opportunities welcomed.

Gives information on any water bodies that may be affected by each issue and any objectives that are in place for them.

Noted. Provision of water body information welcomed.

**ID** MR042

**Organisation** Mr & Mrs Hammond

**MIR Issues** **Responses**

SDS Plots site, Port Glasgow Road, Kilmacolm

Site designated as Green Belt although own plot as part of gardens. Permission was given at time of sale (1928) to build on the plot, and was taken up by some owners. Feel should be removed from greenbelt to allow rest of plots to be developed.

Would like development to be considered. There is no flood risk and hedge at roadside means there is no view at this site. Any view from further up Port Glasgow Road would not be affected by development on this site.

Shortage of smaller homes suitable for elderly and young families in Kilmacolm. Plots site is accessible to village centre and as elderly population is recognised as likely to increase in near future this should be addressed.

**Planning Comments**

Permission given at the time of sale to build on the plot has now lapsed, and is not a consideration in the assessment of the development potential of this site.

Noted.

Noted.

**ID** MR043

**Organisation** HM Explosives Inspectorate

**MIR Issues**

**Responses**

**Planning Comments**

Other Explosive sites are subject to land use planning arrangements and HSE will advise as required through the recognised channels.

Noted.

ID MR044

Organisation Cllr David Wilson

**MIR Issues**

**Responses**

MI 3 Endorse need to combat climate change and contribute toward Government targets.

MI 6 Endorse supporting a range of renewable energy technologies. Interim renewables policy requires to be amended with regard to microrenewables.

MI 11

MI 13 Endorse approach to Inner Lower Port Glasgow study area.

MI 16

SDS

Issue 3 - agree with Inchgreen. Clydeport and RI need to take lead.

Economy - no mention of SMEs who are important to economic growth, needs to be policy guidance on the release of land assets at recession prices to encourage small builders.

Chapter 4 - feel there should be more mention of local shopping centres.

Issue 6 - all shops owned by IC should be transferred to RI as with industrial estates.

Issue 11 - support option 1 plus St Columba's Church

Issue 13 - Support option 1

Issue 16 - support option 1

Chapter 7 - small number of anomalous small sites in the green belt in Kilmacolm should be released for housing. No need to release major sites. In favour of no. 5 for extension to St Columba's school and no. 4 for enabling at Duchal House. Against 22 and feel no need for 18 and 19.

Oppose development on suggested development sites 2 and 3 due to potential flooding of the plain of the Gotter Burn and its effect on Torr Road.

Sites 11 and 13 in Kilmacolm need to be tidied up.

**Planning Comments**

Noted.

Noted and agree that policies will be incorporated into the forthcoming Proposed Plan.

Noted.

Noted.

Noted. The LDP will ensure that an adequate supply of land is available to meet all development requirements, for all businesses, including SMEs. A flexible land supply in a variety of locations should enable the planning system to play its part in stimulating economic recovery and growth.

Noted. The Proposed Plan will, like the current adopted Local Plan, be comprehensive in its coverage of Inverclyde's local centres.

Noted. This is not a matter for consideration in the Proposed Plan, and is a decision that needs to be made by the full Council.

Noted.

Noted.

Noted.

Noted.

Noted.

Noted.

**ID** MR045

**Organisation** Mrs P Crighton

**MIR Issues Responses**

SDS Valley View Farm, Dougliehill Road, Port Glasgow

SEA The site is brownfield and was on the Council's brownfield register in 2001.

Heritage Scotland also consider that the site does not conform to greenbelt.

The SEA report does not use the site name of Valley View Farm when addressing the site.

The map in the background report not accurate.

The MIR states the site is isolated when it is surrounded by private houses on one side and on the opposite side of the road, and a Scottish Water tank on the side. Can gain access to the site from Greenock and Kilmacolm.

Development would not impact on the landscape as land to the front is surrounded by forest planted in 2008 that will take 50 years to mature before being removed.

Question assessment of accessibility, there is a bus stop on Dubbs Road, how close does one have to be to signify nearby?

Site does not flood and has no run off. A flood assessment was done before development started on site. Explain comment on flooding in site assessment.

Claim that if site 19 (Mill Dam, Port Glasgow) were developed it would be the only development on the south of Dougliehill is incorrect.

Believe the assessment of the site was skewed or not judged in accordance with the criteria set out.

**Planning Comments**

The site was recorded on the Council's Vacant and Derelict Land Survey until 2004 after which planning permission was granted for its use for 'Free Range Egg Production' and owners accommodation, and the site was developed.

Noted. The relevant agency of Scottish Government is Scottish Natural Heritage.

Agreed. The site will be referred to in future as Valley View Farm, Dougliehill Road, Port Glasgow.

The base map reflects the latest Ordnance Survey maps that the Council has a licence to reproduce.

The term 'isolated' is used to indicate that the site, if developed, would be separate and would not connect to the defined settlement boundary of Port Glasgow. It is not intended to suggest that the site cannot be accessed by road.

Noted.

The closer a new development site is located to a bus stop, the less reliance there is likely to be on car usage.

Should there be a flooding incident relating to the reservoir, any run off from the reservoir would pass through this site.

The statement refers to any potential development on the Mill Dam site being the only development within the settlement boundary on the south side of Dougliehill Road.

Noted.

ID MR046

Organisation River Clyde Homes

**MIR Issues**

**Responses**

MI 3 Issue 3 - Would consider option 1 as a minimum would be of benefit in increasing the supply of housing in upper Port Glasgow and that option 3 should also be considered in all or part.

MI 8

MI 9 There is now very limited scope for building in Port Glasgow without accessing green belt or open park land/amenity open space and this release would be beneficial. It also borders existing stock owned by River Clyde Homes which makes the release and change of use attractive from a housing management perspective

MI 10

MI 14

MI 15

MI 16 Issue 8 - Consider option 1 is not workable. Option 2 is more suited to allowing flexibility for landowners and developers to apply to develop sites. Think the consideration of open space should identify key areas which will not be permitted for development and all others should have flexibility applied to facilitate opportunities.

MI 17 Issue 9 - Agree with option 2. The principles of the green network should offer some flexibility where not technically or financially viable so as not to prejudice development completely.

Issue 10 - Concerns about the boundary as own stock in Main Street that is 1960s build, of traditional construction with no architectural features that merit conservation. What is the position with newer build in the boundary of the conservation area?

Issue 14 - Whilst would welcome the protection of housing development opportunity sites for affordable housing, we would not wish to see the situation where affordable housing sites are identified as being those remaining after more popular sites have been selected for the private market. In addition, would not wish to see the situation where affordable housing can only be provided in these pre-identified sites as this may impede speculative partnership ventures with local developers.

Concerned that sites which were identified at transfer for mixed tenure estates could be impeded from development by being prescriptive on the type of tenure which could be developed in that area. This appears to go against the principles of the Area Renewal Strategy.

Issue 15 - Given concerns on designating land for affordable housing, also concerned about applying a quota within sites identified as this is very prescriptive and could stifle developer interest. Consider that each site could be looked at on its own merit with a suggestion that some affordable housing could be desirable. This then facilitates developer engagement with affordable housing providers.

Issue 16 - RCH have no properties at Glasgow Road as they have been demolished. Stock at Fyfe Park Terrace is very popular, as is stock at Wilson and Montgomery Street. Bouverie Street should be demolished, any policy to protect it may jeopardise the position of owner occupiers unable to dispose of their properties. Recommend that such a policy designation is not sought. Further consider that the housing strategy for linked new build for residents of the Clune Park area cannot promote the merit of assisting and supporting a proactive housing policy in this area, whilst considering that Bouverie Street should remain to provide poor amenity and house conditions where no demand for this type of property can be evidenced.

**Planning Comments**

Noted

Noted

Noted.

Noted.

Noted. There is a misunderstanding here over the aims and functions of a Conservation Area. Further discussion would be welcomed.

Noted. This is not the intention, for either the identification of sites or on 'pre-identified' sites. The rationale in raising these issues and the need for policy in the new LDP will need to be clarified in light of the representations received. Would welcome dialogue on these matters.

Noted. This is not the intention. The rationale in raising these issues and the need for policy in the new LDP will need to be clarified in light of the representations received. Would welcome dialogue on these matters.

Noted. The quota approach need not be prescriptive as the percentage can be conditioned on the granting of planning permission for each site, but on the basis of a policy 'benchmark' figure of say 20-25%.

Noted.

Noted.

The decision taken by RCH to demolish solely on the current condition of the properties, the poor living conditions of the residents and on housing management grounds is noted. However, no consideration appears to have been given to other important matters, in particular the townscape value of the building to the wider community. Extensive enquiries should be made by RCH (assisted by the Council) to ascertain whether any building firms would be interested in acquiring the properties for redevelopment, before any final instruction is given to demolish. This is all the more important given the steeply-sloping site is unlikely to re-



Issue 17 - In some areas of Drumfrochar and Broomhill demand is high and properties popular. Currently conducting a feasibility study with residents of Drumfrochar and Peat Road to identify a master plan for housing in their ownership, but would welcome the opportunity to feed this into a wider discussion on a new neighbourhood in the area. Stock in Drumfrochar has high demand, but the quality of the housing has been poor and believe with investment, the area can become significantly popular again. Believe a more flexible land use for the former Tate & Lyle works would assist in the plan for the greater area.

There are circa 700 families resident in Broomhill/Peat Road, would welcome the opportunity to reconsider the requirement for circa 33% and 20% private provision at Peat Road and Broomhill in order that the community can be preserved.

In considering a new neighbourhood for this area, it is critical that transport links are considered to facilitate residential traffic from Strone and KGV/Wellington Park to be able to access onto Drumfrochar Road. Infrastructure costs are unlikely to be able to be borne by the developer and the funding of this is critical to the successful development of this area.

At Belville Street, the design for a community garden is well developed. This is a significant area of greening which was identified in the green network. Would appreciate a discussion regarding which other areas within the Belville area are being considered for designation as open space, as this could prejudice ad-hoc infill development of demolition sites to meet reprovisioning need within this area or prevent development opportunities arising within the private sector.

used and built upon, leaving what would be another extremely visible vacant site adjoining the centre of Port Glasgow.

Noted and would welcome further discussions; and also in relation to former Tate & Lyle works.

Noted and would welcome further discussions.

Noted and would welcome further discussions.

Noted and would welcome further discussions.

**ID** MR047

**Organisation** Kilmacolm Civic Trust

**MIR Issues**

**Responses**

MI 11 Issue 11 - Support for the potential to increase the amount of Kilmacolm in a conservation area but not  
MI 13 sure the boundary is correct; Support Option 3.  
MI 14 Suggest a new conservation area at Birkmyre Park.  
MI 15  
SDS

Question the Council's expertise and resources to manage a further Conservation Area and enabling applications.

Query no reference to Quarriers Village Conservation Area & recommend a detailed statement on the evolution of the village.

Issue 13 - The policy should relate to buildings and not just Gardens & Designed Landscapes.

Issue 14 - Support Preferred Option 1.

Issue 15 - Support Option 1.

Support the refurbishment of housing association houses in Corlic Way and community centre site at The Cross.

Ch. 8 Suggested development sites - against development of sites 1-14; support site 5 for education but not housing provided there is community benefit i.e. parking and playing fields.

Do not accept enabling development at Balrossie.

**Planning Comments**

Noted.

Noted. Would welcome clarification of the merits of designating Birkmyre Park as a new Conservation Area for consideration in the Proposed Plan.

Noted.

Noted. It is not the purpose of an MIR to cover all issues, only those that are considered 'Main Issues'. Quarriers Village will be fully considered in the forthcoming Proposed Plan.

Noted. Clarification will be provided if the decision is taken to include an enabling policy in the forthcoming Proposed Plan.

Noted.

Noted.

Noted.

Noted.

Noted.

**ID** MR048

**Organisation** West Dunbartonshire Council

**MIR Issues** **Responses**

NC Raises no issues of concern for West Dunbartonshire Council.

**Planning Comments**

Noted

ID MR049

Organisation Cllr Innes Nelson

**MIR Issues Responses**

SS  
MI 1  
Object to lack of inclusion of Inverclyde bypass road. In order to stimulate industrial growth within Inverclyde a future by-pass needs to be an essential part of our development plan. Without the aspiration in the Development Plan it will never happen. Therefore ask that an additional policy be added for a three towns by-pass with feeder roads around the towns of Gourrock, Greenock and Port Glasgow.

Object to lack of policy for a bridge across the Clyde from Gourrock to Dunoon. In order to stimulate industrial and tourist growth within Inverclyde and Argyll a future Clyde Bridge needs to be an essential part of our development plan. Without the aspiration for a Clyde Bridge in the Development Plan it will never happen. Therefore ask that an additional policy be added for a Clyde Bridge from Gourrock to Dunoon. Furthermore their (sic) needs to be future dialogue between Inverclyde Council, Argyll and Bute Council and the Scottish Government in planning a future Clyde Bridge.

Issue 1 - object to change of use from industrial to mixed use and most strongly object to any housing being proposed for these areas due to: A78 overcapacity; Satellite Development - compared to the many areas available for housing in Inverclyde any housing would be of a satellite nature and would not be served locally by schools or shops. This would lead to unnecessary journeys by car, which in turn would have a negative effect on the environment; Industrial Regeneration of Inverclyde - the site is currently a secure site for industry and can easily be monitored. The introduction of housing would change access to these, which would have a negative effect on industrial security. This in turn would lead to the sites being less attractive to industry and would have a negative effect on the regeneration of the area; Subsidence on Peat - much of these sites are known to be a former lakebed, which has major implications for subsidence. This could lead to insurance difficulties for any housing built; SEPA Flood Plain - the SEPA Indicative River and Coastal Flood map clearly indicates that about 50% of this site being in a river valley flood plan is liable to flooding. There have been major mistakes made by planners in recent years in granting planning permission on unsuitable flood plains in Scotland. To allow building of housing on this flood plain would not only lead to the flooding of houses but would in turn lead to them

**Planning Comments**

Consideration of a 'three towns' bypass, as described, was undertaken as part of the preliminary investigation of potential new issues for the new LDP. The Council's Roads Service investigated four potential route options, with fully-costed assumptions for each. These were discussed at the LDP Members/Officers Group and it was agreed not to pursue this initiative in this LDP, primarily on cost grounds but also practical difficulties associated with the engineering challenges involved in such a major scheme. Also considered that the disbenefits for the towns of Gourrock, Greenock and Port Glasgow would far out-way the benefits, from reductions in travelling times between the central and west of the authority, and Glasgow.

In considering a major strategic scheme such as this, the proper course for the Council to take would be to make representations first with the Scottish Government, and through this, potentially securing agreement in principle, to the project. If this were to be secured, it could then be included in the NPF, which in turn would be taken forward in the GCV SDP. For a major project such as this, the LDP would take its lead from both the NPF and SDP, the rightful place to set out the vision, not what is being asked of the LDP.

In considering a major strategic scheme such as this, the proper course for the Council to take would be to make representations and seek agreement first with the relevant neighbouring authority(s), then the Scottish Government, and through this, potentially securing agreement in principle, to the project. If this were to be secured, it could then be included in the NPF, which in turn would be taken forward in the GCV SDP. For a major project such as this, the LDP would take its lead from both the NPF and SDP, the rightful place to set out the vision, not what is being asked of the LDP.

Noted. The consideration of how to take forward the future planning of Spango Valley has been fully debated in the LDP Members/Officers Group in the context of the now lengthy and ongoing consultation Council officers have had with the respective owners of the sites. It was agreed by the Group that it would be on this basis that a number of potential futures for Spango Valley would be outlined, all of which would likely require a consolidation of the business/industrial use on the site, but not to the exclusion of the consideration other uses. It is on this basis that Spango Valley was identified as a 'Proposed Area of Change' in the MIR.

The Preferred Option (No 2), provides the Council with the opportunity to consider the future of Spango Valley through a comprehensive master-planning approach, something that the

being uninsurable; Neighbourhood Nuisance - the industrial areas within the sites and farms in the area could become victims of nuisance and vandalism from youths living in the proposed housing areas. There are also problems with agricultural fences and walls being extensively damaged which in turn allows livestock to exit onto roads causing danger.

current owners are in agreement and on which they have made representations. There is little likelihood that the entire area currently in business/industrial land use will be required for this same use. The planning of the area lies in finding the most appropriate balance of new uses, including possibly housing, and it is on this basis that we will continue to engage with the owners and their planning consultants.

With respect to the separate matters raised – road capacity, risk of flooding, security of industrial premises – these are issues that will be addressed and assessed in the normal way through pre-application discussions and in the determination of any planning application that emerges. With respect to the description of Spango Valley as 'satellite development', it is agreed that there are better located housing development opportunities in Inverclyde. However, if proposals do come forward, regard will be had through the masterplan referred to above, to ensuring the provision of improved links (footpaths, roads and rail), are addressed, to better connect Spango Valley with the rest of south west Greenock and the centre of Greenock. With regard to local shops, schools and other community facilities, the site is not that removed from these facilities and in any event, additional housing could bring additional community benefits of that kind.

**ID** MR050

**Organisation** Mrs Elizabeth Fisher

**MIR Issues** **Responses**

SDS Plots site, Port Glasgow Road, Kilmacolm.

Ground in question is part of garden ground of house. Was not notified it had been designated as Green Belt and therefore raises legality of designation.

Always intended to build a smaller house on site and sell current home to house a family.

Construction on site would effectively block access to the field behind, where there is some local opposition to planning permission being granted for housing.

Site is infill and accordingly should be considered suitable for appropriate housing.

**Planning Comments**

There is not a legal requirement to notify residents of a change in designation in a Local Plan.

Noted.

Noted.

Noted.

**ID** MR051

**Organisation** Mr Donald Shearer

**MIR Issues** Responses

Other

Industrial estates - most are real eyesores, badly signposted and maintained.

Housing estates - does not seem to be any plans for improving these and many are deteriorating.

Town centres - what real interest is being shown in these? Access issues for delivery vehicles. Will the improvement works (Westburn underpass and Cathcart Square) be maintained and question money being spent on public art rather than addressing e.g. traffic issues.

Greenock Cemetery - should be a centrepiece attraction for the town, but has been sadly neglected.

Tourism - best viewpoints are neglected e.g. Tower Hill, Lyle Hill and Kilmacolm Road.

Sugar Sheds - concerned at lack of visible progress for money spent and lack of regard for flooding issues when approach road laid out.

French Memorial Cross - one of the main tourist attractions but is an eyesore and needs maintenance.

If we cannot look after what we have at present how will proposed projects fare in the future.

### Planning Comments

Noted. The LDP deals with land use policy and not matters of this level of detail.

The Local Housing Strategy sets out the Council's strategy for housing and Registered Social Landlords also have plans in place for their estates. These will inform housing policy in the LDP.

Noted. The LDP deals with land use policy and not matters of this level of detail.

Noted. The LDP deals with land use policy and not matters of this level of detail.

Noted. The LDP deals with land use policy and not matters of this level of detail.

The Council does not own the former Sugar Warehouse. Flooding issues would have been taken into account in the development of the road network.

Noted. The LDP deals with land use policy and not matters of this level of detail.

Noted. The LDP deals with land use policy and not matters of this level of detail.

**ID** MR052

**Organisation** James Barr

**Representing** Duchal Estate

**MIR Issues** **Responses**

MI 13 Issue 13 - support option 1. It is considered that the adoption of an enabling policy will secure the future of important listed buildings within Inverclyde Council. This enabling policy has been successfully utilised elsewhere in Scotland and is a recognised method of securing fundraising for important listed buildings, their curtilages et al and is supported by Historic Scotland.

**Planning Comments**

Noted.



**ID** MR053

**Organisation** James Barr

**Representing** Duchal Estate

**MIR Issues**

**Responses**

**Planning Comments**

SDS	Advise that sites 6 and 7, previously promoted for development by Duchal Estate, should be withdrawn.	Noted.
	Object to sites 1,2,3 as they are not sustainable.	Noted.
	Object to site 8 as it would be an unacceptable intrusion into the northern Kilmacolm Green Belt and visible in landscape terms.	Noted.
	Object to site 9 as there would be an unacceptable impact on the outer Green Belt of Kilmacolm and would not comply with landscape criteria. Sites 8,9 and 10 would not be an acceptable size of release.	Noted.
	Object to site 10 as it would be backland' development relying on the development of sites 8 and 9 and an unacceptable impact on the landscape.	Noted.
	Object to site 11 as it would be ribbon development and possibly require a new access causing visual intrusion.	Noted.
	There is a need for housing in Kilmacolm, including affordable, and site 4 is an appropriate, sustainable location.	See response to MR010 above.

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**ID** MR054

**Organisation** Mr & Mrs Reid

**MIR Issues**

**Responses**

**Planning Comments**

SDS

Port Glasgow Road Plots, Kilmacolm

The Planning Department were in agreement to the planning of the plots and then did not support the reported enquiry. This has been ongoing for the last 20-25 years.

Noted.

ID MR055

Organisation Kilmacolm Community Council

MIR Issues	Responses	Planning Comments
MI 15 SDS MI 11 MI 13	<p>Note that the Council's preferred option under Main Issue 15 proposes protection of 3 sites in Kilmacolm with the possible inclusion of a quota of affordable housing when/if they are developed. Have no principled objection to development of these sites and well disposed to inclusion of a proportion of affordable homes. However would attach some importance in case of Whitelea Road proposal to protecting safe and sufficient access to cycle track.</p> <p>For sites suggested for development in the Green Belt, glad to note view that majority are unnecessary and inherently in unsustainable locations. See major problems with most sites concerned and would hope the Green Belt is not adjusted to exclude them. Nevertheless, can envisage specific circumstances where certain development of site 5 would be in wider social and economic interests of the area. Equally, if demand for housing develops and an extension of built up area of the two settlements becomes necessary, consider that sensitive development of part of site 2 currently open field (but not part which is woodland) or site 4 would be less intrusive than most of the others.</p> <p>KCC note the proposal for a new Conservation Area around the Cross and are surprised that it would not include St Columba's Church. KCC note the likely impact of Conservation Area status on a substantial number of people living in the area as well as the importance of not imposing onerous burdens on shop keepers. Conversely, KCC accept the possibility that measures to make the shopping area more visually attractive could be beneficial. Overall, KCC feel that the case has not been made. Would be useful to have a statement of likely benefits and drawbacks and feel direct consultation essential. Offer services to this end.</p> <p>Puzzled by the exclusive emphasis on Gardens and Designed Landscapes for enabling development. Would lean toward Option 2.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted. Further consideration of the merits of a conservation area in Kilmacolm will be given.</p> <p>Noted.</p>

**ID** MR056

**Organisation** Lambert Smith Hampton

**Representing** Scottish Water

**MIR Issues** **Responses**

SDS Land to the south of cemetery, Kilmacolm - Scottish Water own this land and, given early stage of preparation of MIR, are not seeking to make a formal representation at this point, but support proposals (see MR024) and would be prepared to make land available to support development.

**Planning Comments**

Noted.

ID MR057

Organisation Smiths Gore

Representing Mr & Mrs Rowan-Hamilton

**MIR Issues Responses**

SDS Submitted 2 sites adjacent to Port Glasgow for inclusion in the LDP.

GBR

Sites are greenfield and so preferred option is not to include them. Assessment of sites was generally positive, particularly site A and this should be considered further despite the wider decision not to allocate any further greenfield land. Have proved that site A is of no particular nature conservation or scenic value and when the site to the south is developed will create an anomalous situation of no benefit to the regeneration of the wider east Port Glasgow area.

Site B can create follow-on development from the Muir Homes scheme and offers the opportunity for a high value development to help raise the image of this side of Port Glasgow.

Site A should not be included in the Green Belt as once the site to the south is developed, it will be surrounded on 3 sides by development. Wish to have sites A and B removed from the Green Belt to rationalise it at this location as opportunities to review Green Belt designations are few and the Council should give themselves enough scope to take forward these sites during the next Plan period without the difficulties of having to address a Green Belt release. Even if the Council do not feel they can as yet allocate the sites, they should recognise that these are logical extensions to Port Glasgow which should come forward in time and therefore should be taken out of the Green Belt.

Also asked that the SINC be rationalised and reiterate this request to have the SINC reduced in this area to form a more manageable and valuable site and facilitate the development of housing in this area over time.

**Planning Comments**

Noted.

The MIR has indicated consideration will be given to augmenting the HLS with some selected release of smaller sites, as does the GCV SDP: Proposed Plan through the flexibility afforded local planning authorities in Strategy Support Measure No.10 in the Proposed Plan.

Noted.

Noted: the decision not to make any strategic releases for housing development is based on the outcomes and findings of the HNDA in the GCV SDP Proposed Plan (June 2011). However, while the SDP states that there is no requirement for strategic release, local planning authorities have flexibility through the application of Strategy Support Measure No.10 in the GCV SDP:Proposed Plan.

Noted.

**ID** MR058

**Organisation** Ms Katrina Vine

**MIR Issues**

**Responses**

**Planning Comments**

SDS

The approach to Quarriers Village from Bridge of Weir is not improved by the recent Gotter Bank and Torr Avenue developments. Adding another patchwork development on the approach to the Village would further detract from its character.

Noted.

There is a chance that Quarriers Village could be Inverclyde's New Lanark, it would be a pity to spoil this opportunity for the sake of a few dozen houses.

Noted.

**ID** MR059

**Organisation** Ms Helena Jackson-Boyd

<b>MIR Issues</b>	<b>Responses</b>	<b>Planning Comments</b>
SDS	At present the Village is lacking in any real facilities at all, a matter which would need to be addressed in unison with any possible residential developments.	Noted.
	Do not see how the current road or public transport facilities would sustain any new development, and not sure there is market demand for it.	Noted.
	Would appreciate any involvement for residents should the Quarriers Charity sites be considered in the LDP.	Noted.

**ID** MR060

**Organisation** Thomson Architects

**Representing** Julie Romani

**MIR Issues** **Responses**

SDS  
MI 17 Would like to submit site - Former Sugar Refinery, Drumfrochar Road, Greenock - for change of use from Special Area to residential.

**Planning Comments**

Noted.



**ID** MR061

**Organisation** Sir David Mason

**MIR Issues** **Responses**

SDS Land at Misty Law, West Glen Road, Kilmacolm - would like Green Belt boundary to be reviewed to remove this site, which previously had permission for development of a dwelling, from the Green Belt.

**Planning Comments**

Noted.

**ID** MR062

**Organisation** The Morrison Partnership

**Representing** Mr Angus Macmillan

**MIR Issues** **Responses**

SDS  
MI 4

Agrees that there is an over-supply of industrial brownfield land in Greenock, and some should be considered for other uses. Recommends that the land at Bogston Lane in Greenock be re-categorised as commercial and residential. This would include a budget hotel at the eastern end of the site, with the remainder developed for flatted residential puposes.

**Planning Comments**

Noted.

ID SEA Gateway

Organisation Directorate for the Built Environment

**MIR Issues Responses**

SEA Historic Scotland

Historic Scotland advise that it was content that the comments provided at the scoping stage had largely been taken into account during the preparation of the interim Environmental Report (ER) and that the interim Environmental Report provides a clear explanation of how the environmental assessment of the Main Issues Report was undertaken.

**Main Issue 13**

Historic Scotland note that a 'significant positive impact' has been predicted for cultural heritage as a result of the proposed enabling development policy for Gardens and Designed Landscapes. Within the commentary section, this positive impact is identified as being as a result of the retention of the listed buildings. The predicted 'significant positive impact' does not reflect the potential for a negative direct / indirect impact on the Inventory Gardens and Designed Landscapes themselves, as a result of an enabling policy.

**Suggested Development Site: Milton Wood, Lochwinnoch Road (Site 4)**

The assessment predicts 'no significant environmental effects' on cultural heritage. It is not clear how the potential for any negative direct / indirect impacts on Duchal House Garden and Designed Landscape have been reflected in this assessment.

**Suggested Development Site: Fort Matilda Industrial Estate (Site 30)**

There are 'no significant environment effects' predicted within the Environmental Report. The category B-listed Former Torpedo Works (HB no. 50579) is within the development site. It is noted the potential for a negative impact on this asset depending on any proposed redevelopment, for example, if it was to involve significant alteration or demolition of the listed building.

**SEPA**

SEPA consider that the MIR Interim ER provides a concise assessment of work carried out to date on the preparation of the Inverclyde Local Development Plan.

Paragraph 2.4 highlights that the Main Issues Report deals with areas of change in policy direction and land use and, where no substantive changes are proposed, these matters will not be dealt with in the Environmental Report. While we would generally agree with this approach there have been a number of recent legislative changes with respect to the water environment and you may therefore wish to assess whether the existing policies etc. are appropriately aligned with these changes.

Advised to include the Water Environment (Controlled Activities) (Scotland) Regulations 2011 in Appendix E. These regulations relate directly to activities which may affect the water environment and therefore have the potential to influence the overall design of a development proposal.

While there are a number of references to waste legislation in Appendix E, it is not clear that the issue is dealt with in any detail by either this interim ER or the MIR. This position should be clarified.

To improve clarity in the Environmental Report, include some discussion on the expected impacts on air quality from proposed regeneration proposals.

Appendices F and G provide concise easy to follow environmental information which should aid transparency in decision making as the local development plan progresses. Once decisions have been

**Planning Comments**

Noted

Noted. Further comments on the matter will be included in the ER to accompany the Proposed Plan.

Noted and will be further analysed, if development site is included in the Proposed Plan.

Noted and will be further analysed, if development site is included in the Proposed Plan.

Noted.

Noted and changes in legislation, with regard to the water environment, will be considered, where appropriate, in the Environmental Report to accompany the Proposed Plan.

The document will be included as one of the plans, programmes and strategies to be considered in the Environmental Report to accompany the Proposed Plan.

The issue of waste will be dealt with further in the Proposed Plan and the Environmental Report to accompany it.

Further information on air quality has been made available since the publication of the Main Issues Report Interim Environmental Report. It is the intention of the Council to scope air quality in and the issue will be considered in the Environmental Report to accompany the Proposed Plan.

Noted.

made these tables could be expanded to include the finalised reasoning for the option selected.	
Appendices F and G refer to potential mitigation. It would be useful if they also identified the body responsible for providing it.	Noted.
The provision of adequate drainage infrastructure to support new development is a key consideration for the assessment of potential adverse effects of development on the water environment. SEPA would consider any allocations which do not connect to the public sewage system as having a significant negative effect against the water environmental receptor and would ask that this is taken into account as plan preparation progresses.	Noted and agreed.
Scottish Natural Heritage (SNH)	
SNH consider that the Environmental Report (ER) provides a detailed assessment of the Main Issues Report (MIR).	Noted.
Where mitigation has been suggested it should be dealt with within the Proposed Plan. Where it is difficult to define specific measures at this stage it should be included in the revised Environmental Report and also included within the Proposed Plan.	Noted.
Reference is made within Section 6: 'Next Steps' to the Habitats Regulations Appraisal. SNH have produced guidance to help plan makers carry out Habitats Regulations Appraisal (HRA) of their plans and ensure these meet the requirements of the Habitats Regulations.	Noted and guidance will be referred to.
Main Issues Chapter 4 – Main Issue 3: Port Glasgow	
Agree with the suggested mitigation for Option 1, particularly that green networks should be retained or strengthened where possible. We would also suggest that a masterplan is brought forward for the development of the site.	Noted.

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**MIR Issues Key**

**MI - Main Issue**

**SDS - Suggested Development Sites**

**NC - No Comments**

**SS - Spatial Strategy**

**GBR - Green Belt Review**

**SEA - Strategic Environmental Assessment**

**MS - Monitoring Statement**

**Other - Matter not raised in MIR**

**HNDA - Housing Needs and Demand Assessment**