

**Report To: Safe, Sustainable Communities Committee**

**Date: 6 March 2012**

**Report By: Corporate Director,  
Regeneration and Environment**

**Report No: R&E/R&P/SSC/  
03/12/FJM/RG/003**

**Contact Officer: Stuart W Jamieson**

**Contact No: 712404**

**Subject: Inverclyde Local Development Plan: Post 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: Post Main Issues Report Additional Suggested Development Sites consultation and authorise continued engagement with stakeholders in order to inform the Proposed Plan.

## **2.0 SUMMARY**

- 2.1 The Committee approved publication of the Inverclyde Local Development Plan: Main Issues Report for consultation in May 2011. This concluded on 22 July, and the representations received were reported to Committee on 25 October 2011. This Committee also authorised a further public consultation exercise to be undertaken for those new suggested development sites which were submitted after the publication of the Main Issues Report (MIR).
- 2.2 The Post MIR Additional Suggested Development Sites document was published in November 2011 for a six week period. A total of 101 representations were received from individuals and organisations during this period, although many concerned the three suggested development sites in Quarrier's Village which were included in the MIR itself. It appeared that many residents in Quarriers were not aware of the original MIR and took the opportunity of this latest consultation to express their views. The new sites identified in the Post MIR document (13 in total) and the comments submitted on them are incorporated within Annex 1, attached to this report.
- 2.3 The majority of the representations on the new sites were opposed to further Green Belt release around Kilmacolm, Inverkip, Greenock and Port Glasgow. There was however a limited support for further release of Green Belt land at Smithy Brae, Kilmacolm which was linked to the development of the adjacent brownfield site in the centre of the village.

## **3.0 RECOMMENDATIONS**

- 3.1 That the Committee:
- (a) notes the representations received during the consultation on the Post MIR Suggested Development Sites document (Annex 1); and
  - (b) authorise the continued engagement with Key Agencies, selected other stakeholders and those organisations, developers and individuals who request further discussion, in advance of drafting the Proposed Plan.

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

## 4.0 BACKGROUND

- 4.1 Public consultation on Inverclyde Council's first MIR was undertaken between 27 May and 22 July 2011. 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 (see accompanying Committee report on DPS and PS). The MIR public consultation generated a total of 62 responses.
- 4.2 Members will recall that, Committee authorised a further public consultation exercise in October 2011 to be undertaken for those new suggested development sites which were submitted after the publication of the MIR.
- 4.3 The Post MIR Additional Suggested Development Sites document was published in November 2011 for a six week period (4 November – 16 December 2011). The publication of this document is not a statutory requirement, but was intended to demonstrate that the Council was being completely open and transparent in its consideration of all suggested development sites by seeking public comments on them. The majority of these sites are located within the Green Belt, and the Council has been asked to consider their suitability for housing. The consultation was advertised by way of a public notice in the Greenock Telegraph, articles in the press, letters sent to all stakeholders, the distribution of leaflets and posters and the document being deposited in all libraries and in the main Council offices.
- 4.4 In parallel with the publication of the Post MIR consultation, 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 published Addendum to the SEA have been identified at the end of Annex 1, outlining the post MIR consultation responses.

Min Ref:  
25/10/11,  
Para 696

Annex 1

## 5.0 PROPOSALS

- 5.1 A total of 101 representations were received from individuals and organisations on the Post MIR document, making comment on 8 of the 13 additional sites. Some submitted comments on more than one site, while the majority were concerned with the three suggested development sites in Quarrier's Village, which were included in the MIR itself, published last summer. It appeared that many residents in Quarriers were not aware of the original MIR and took the opportunity of this latest consultation to express their views. The representations on the sites in Quarrier's Village have been included in this report and all comments will be given full consideration in the preparation of the Proposed Plan.
- 5.2 Most of the representations on the new suggested development sites focused on those around Kilmacolm, with the majority of comments being opposed to further Green Belt release. The main exception to this was a limited support for further release of Green Belt land at Smithy Brae which is linked to the development of the adjacent brownfield site in the centre of Kilmacolm. A few representations were also received for the Green Belt sites near Inverkip and Greenock, all opposed to development, and a significant opposition to any development on the site at Dougliehill, Port Glasgow.
- 5.3 Annex 1 to this report records all the individual representations to the consultation and those submitted by a range of statutory and Key agencies and national and local bodies. Among the responses it is worth noting the following:
- (1) Quarrier's Village – 46 representations, including one on behalf of 54 residents of The Grange, objecting to the re-zoning of the three fields at Quarrier's Village (identified in the MIR) from Green Belt to housing.
  - (2) Smithy Brae, Kilmacolm – 16 representations opposed to housing development on that part of the site in the Green Belt, and 5 representations supportive of

Min Ref:  
03/05/11,  
para 305

development, including housing, on the entire site.

- (3) Hazelmere Road, Kilmacolm – 12 representations opposed to the rezoning of the site from Green Belt to housing, including one which sought a partial change to the Green Belt boundary.
- (4) For West Glen Road, Kilmacolm; Dougliehill Road, Port Glasgow; Finnock Bog Farm East, Inverkip; Berfern, Inverkip; and Flatterton Farm, Greenock, the number of representations opposed to the rezoning of the sites from Green Belt to housing ranged between 1 and 9.
- (5) Kilmacolm Community Council opposes all suggested development sites in the Green Belt, and welcomes the removal of two sites from consideration for development.
- (6) Kilmacolm Civic Trust opposes all suggested development sites in the Green Belt, welcomes the removal of two sites in Duchal Estate from consideration for development and supports the development of the remainder of the Smithy Brae site.
- (7) Clyde Muirshiel Park Authority is opposed to certain suggested development sites that could impact upon the Regional Park.
- (8) The Scottish Government (Transport Scotland and Historic Scotland) are concerned over the impact of new development on certain listed buildings associated with the suggested development sites, and over the impact of the sites on the trunk roads.
- (9) Network Rail, Strathclyde Partnership for Transport (SPT) and Scottish Environment Protection Agency (SEPA) are supportive of sustainable locations for new developments, including good accessibility in relation to public transport; support the development of brownfield sites over greenfield; and seek the inclusion of a developer's contribution policy in the LDP.
- (10) Sanmina SCI – re-affirms support for the spatial strategy and opposes development on all Green Belt sites.

5.4 In response to these representations promoting land releases in the Green Belt for housing development, it is worth reiterating my comments on those similar representations submitted at the MIR consultative stage. The position remains that while the Glasgow and the Clyde Valley SDP Proposed Plan concludes that there is no strategic requirement to expand the supply of land for private sector housing, to either 2020 or 2025, the GCV Housing Need and Demand Assessment (HNDA) indicates there is a requirement for affordable housing and this has been further confirmed in the Council's approved Local Housing Strategy 2011-16. Min Ref: 25/10/11, para 698

5.5 The LDP: Main Issues Report indicated that consideration would be given to augmenting the housing land supply to meet this affordable housing requirement, including potentially through selected release of smaller sites in the Green Belt. The GCVSDP Proposed Plan supports this approach through the flexibility given to local planning authorities in Strategy Support Measure No. 10 in the Proposed Plan. Min Ref: 30/08/11, para 516

## 6.0 IMPLICATIONS

### 6.1 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	Budget Year	Proposed	Virement	Other
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	Heading		Spend this Report	From	Comments
n/a	n/a	n/a	n/a	n/a	n/a

6.2 **Legal:** none

6.3 **Personnel:** none

6.4 **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 All of the representations received during this consultation and that undertaken for the MIR itself will be given full consideration in the preparation of the next stage in the process, the Proposed Plan. In parallel with these consultations, discussion has been ongoing with a number of national and local bodies, including Key Agencies, developers and land owners on a variety of issues that require to be addressed in the new Plan. Internal consultation has been, and will continue to be an important part of Plan preparation, particularly with colleagues in Safer and Inclusive Communities (Housing Team), Property Assets and Facilities Management and Development Management within the Service.

8.2 These discussions will continue throughout the coming months, with the information and opinions that these discussions generate, contributing to the policies and proposals that will be contained within the Proposed Plan.

## 9.0 BACKGROUND PAPERS

- 9.1
- (1) The Planning etc (Scotland) Act 2006
  - (2) Inverclyde Local Plan 2005 (plus additions, 2007 – 2011)
  - (3) Inverclyde Local Development Plan: Main Issues Report, Monitoring Statement, SEA and accompanying Background Reports (May 2011)
  - (4) Inverclyde Local Development Plan: Post Main Issues Report Additional Suggested Development Sites (November 2011)
  - (5) Inverclyde Local Development Plan: Post Main Issues Report SEA – Addendum to the Interim Environmental Report (November 2011)

## ATTACHMENT

### **Annex 1: Inverclyde Local Development Plan – Post MIR Consultation Responses**

Head of Regeneration and Planning  
 Cathcart House  
 6 Cathcart Square  
 Greenock  
 PA15 1LS

20<sup>th</sup> February 2012

SSC Cmtee 2012 LDP Post MIR Reps (March 2012)

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# Post MIR Consultation responses

## Individual Representations

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### Post MIR Site BERFERN

Title	Second Name	Organisation
Mr	Clark	Private Individual
Mr & Mrs	MacKenzie	Private Individual
Mr & Mrs	McGuigan	Private Individual

**Response** Opposition to the re-zoning of the land at Berfern, Inverkip from Green Belt to housing in the Inverclyde Local Development Plan for the following reasons:

- there is no demonstrable need for new housing in the Inverkip/Wemyss Bay area
- due diligence needs to be carried out in respect of sewerage, water supply pressure, school places, road safety and refuse collection
- insufficient capacity for the potential size of development
- potential danger of living close to high voltage sources
- difficulty of development because of the presence of rock
- the GCVJSP 2006 requires the designation and safeguarding of the Green Belt with a presumption against development in the countryside
- the Green Belt policy in the Inverclyde Local Plan 2005 presumes against development in such locations
- release of this site for housing would further exacerbate the traffic problems on the A78
- there would be an impact on wildlife if housing is developed on this site
- there is no bus route to accommodate non drivers
- Spey Road cannot accommodate the traffic from building works
- new housing will impact on the views

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### Post MIR Site DOUGLIEHILL

Title	Second Name	Organisation
Councillor	Wilson	Inverclyde Council
Ms	Agnew	Private Individual
Mr & Mrs	Barnes	Private Individual
Ms	Canning	Private Individual
Mr & Mrs	Duncan	Private Individual
Mr	McArthur	Private Individual
Mr	McEachran	Private Individual
Mr	Park	Private Individual
Mr	Pettigrew	Private Individual

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**Response** Opposition to the re-zoning of the land at Dougliehill, Port Glasgow from Green Belt to housing in the Inverclyde Local Development Plan for the following reasons:

- there is no shortage of houses for sale within the area and there is no need to increase housing further and reduce the Green Belt
- development on this site would effect the privacy of existing houses and block sunlight
- there is already an existing drainage problem from this land which floods into the gardens of adjacent houses
- building on this land could put property and residents at risk of injury or damage
- an unsympathetic development may decrease the value of existing houses
- inadequate access as the existing road is single track and congested
- there is no safe access for pedestrians
- access to the site would require the removal of recently planted trees
- noise and dust pollution would result if this site was developed
- insufficient information has been provided

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**Post MIR Site FINNOCK BOG FARM EAST**

<b>Title</b>	<b>Second Name</b>	<b>Organisation</b>
Mr	Clark	Private Individual
Mr & Mrs	MacKenzie	Private Individual
Mr & Mrs	McGuigan	Private Individual

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**Response** Opposition to the re-zoning of the land at Finnock Bog Farm East, Inverkip from Green Belt to housing in the Inverclyde Local Development Plan for the following reasons:

- there is no demonstrable need for new housing in the Inverkip/Wemyss Bay area
- due diligence needs to be carried out in respect of sewerage, water supply pressure, school places, road safety and refuse collection
- insufficient capacity for the potential size of development
- potential danger of living close to high voltage sources
- difficulty of development because of the presence of rock
- the GCVJSP 2006 requires the designation and safeguarding of the Green Belt with a presumption against development in the countryside
- the Green Belt policy in the Inverclyde Local Plan 2005 presumes against development in such locations
- release of this site for housing would further exacerbate the traffic problems on the A78- the site has no direct access to a public road
- the site is subject to flooding at the north part of the field
- there would be a loss of the Green Belt buffer between existing housing and Clyde Muirshiel Regional Park
- there would be an impact on wildlife if housing is developed on this site
- there is no bus route to accommodate non drivers
- Spey Road cannot accommodate the traffic from building works
- new housing will impact on the views

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**Post MIR Site HAZELMERE ROAD**

<b>Title</b>	<b>Second Name</b>	<b>Organisation</b>
Ms	Beck	Private Individual
Mr	Donaldson	Private Individual
Ms	Edmundson	Private Individual
Mr	Hamilton	Private Individual
Mr	Hardie	Private Individual
Ms	Jackson-Boyd	Private Individual

Mr	Kelly	Private Individual
Ms	Kerr	Private Individual
Mr	Marr	Private Individual
Mr	Mercer	Private Individual
Ms	Muir	Private Individual
Mr	Watson	Private Individual

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**Response** Opposition to the re-zoning of the land at Hazelmere Road (East and West) in Kilmacolm from Green Belt to housing in the Inverclyde Local Development Plan for the following reasons:

- no need to develop additional new housing in Kilmacolm
- the negative impact upon biodiversity
- the negative impact on amenity, human health and well being
- the site acts as a natural flood retention area
- climatic factors
- the existing sewer which serves the immediate area frequently discharges into nearby gardens
- the loss of trees would have a damaging effect upon the setting and values of the nearby houses
- building on this site would prevent any public access to the river

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### Post MIR Site QUARRIERS VILLAGE

<b>Title</b>	<b>Second Name</b>	<b>Organisation</b>
Councillor	Wilson	Inverclyde Council
Mr	Davie	Private Consultant on behalf of 54 residents from The Grange
Mr	Adair	Private Individual
Mr	Adam	Private Individual
Ms	Adam	Private Individual
Mr	Bird	Private Individual
Mr	Burns	Private Individual
Ms	Burry	Private Individual
Mr	Carruth	Private Individual
Mr	Cracknell	Private Individual
Mr	Donaldson	Private Individual
Mr	Dornan	Private Individual
Mr & Mrs	Gauld	Private Individual
Ms	Hewitt	Private Individual
Mr	Holmes	Private Individual
Ms	Hotiana	Private Individual
Ms	Jackson-Boyd	Private Individual
Mr	Keith	Private Individual
Mr & Mrs	Kennett	Private Individual

Dr & Mrs	Knott	Private Individual
Mr & Mrs	Loudon	Private Individual
Mr & Mrs	MacCrimmon	Private Individual
Mr	Marshall	Private Individual
Ms	Martin-Wright	Private Individual
Mr & Mrs	McCardie	Private Individual
Mr	McColl	Private Individual
Mrs	McInally	Private Individual
Ms	McLundie	Private Individual
Mr	McLundie	Private Individual
Ms	McMillan	Private Individual
Mr	McMillan	Private Individual
Mr & Mrs	Miller	Private Individual
Mr	Milligan	Private Individual
Mr	Murray	Private Individual
Mr & Mrs	Rentoul	Private Individual
Mr & Mrs	Ross	Private Individual
Mr	Russell	Private Individual
Mr & Mrs	Sobolewski	Private Individual
Ms	Taher	Private Individual
Ms	Taylor	Private Individual
Mr	Tiffoney	Private Individual
Ms	Wallace	Private Individual
Mr	Watson	Private Individual
Ms	Welsh	Private Individual
Mr	Wright	Private Individual
Mr	Wright	Private Individual



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**Response** Quarriers Village

Opposition to the re-zoning of the three fields at Quarriers Village (identified in the MIR) from Green Belt to housing in the Inverclyde Local Development Plan for the following reasons:

- there is no need to develop additional new housing in the LDP area, including Quarriers
- the inadequacy of the existing roads within the village to cope with the anticipated increase in volume of traffic
- development would be detrimental to the landscaping of the area
- safety concern to pedestrians on narrow roads and ones that have no footpath
- flooding problems on two of the sites
- infrastructure capacity strains to meet existing needs
- public transport in the village is practically non-existent
- lack of local amenities in the village, including shops and schools
- the character, built heritage and social history of the village would be ruined
- the threat to wildlife and trees if housing were developed
- coalescence of the village with the former Bridge of Weir Hospital site
- there would be a detrimental effect on the value of the existing houses

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**Post MIR Site SMITHY BRAE (OPPOSE)**

<b>Title</b>	<b>Second Name</b>	<b>Organisation</b>
Mrs	Beverstock	Private Individual
Mr	Beverstock	Private Individual
Mrs	Boyland	Private Individual
Mr	Davidson	Private Individual
Mr	Drummond	Private Individual
Mr	Eagle	Private Individual
Ms	Erasmus	Private Individual
Miss	Lochhead	Private Individual
Mr & Mrs	MacConnacher	Private Individual
Mr	McKerrell	Private Individual
Ms	McKerrell	Private Individual
Ms	Murricane	Private Individual
Mr	Newton	Private Individual
Ms	Parton	Private Individual
Ms	Richardson	Private Individual
Mr	Watson	Private Individual

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**Response** Opposition to the re-zoning of the land at Smithy Brae in Kilmacolm from Green Belt to housing in the Inverclyde Local Development Plan for the following reasons:

- there is no need to develop additional new housing in Kilmacolm
- the loss of the views of open fields would change the character of the approach to the village
- dangerous access and egress to and from Smithy Brae
- there would be a visual impact locally
- the site is overlooked by over 50 properties
- the land is used by dog walkers and is a good amenity for the village
- the lower part of the land is a flood plain
- the loss of wildlife if the land is developed
- the character of the village would be damaged
- limited Scottish Water capacity for additional houses in the village
- this site does not meet the 'enabling' development criteria, as there is no listed building on the site
- the contamination of the ground should not be disturbed

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**Post MIR Site SMITHY BRAE (SUPPORT)**

<b>Title</b>	<b>Second Name</b>	<b>Organisation</b>
Mr	Gallacher	Private Individual
Mr	Gash	Private Individual
Mr	Hall	Private Individual
Ms	Russell	Private Individual
Ms	Wood	Private Individual

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**Response** Support for the re-zoning of the land at Smithy Brae in Kilmacolm from Green Belt to housing in the Inverclyde Local Development Plan for the following reasons:

- a meaningful improvement will be made to the village in a coordinated manner
- a careful and sympathetic development could match the outstanding development in the village centre (library and community centre)
- an effective way to achieve the most appropriate regeneration of the central part of the village
- the Smithy Brae area urgently needs to be addressed in a vigorous and positive way
- will benefit the village in upgrading an unsightly neglected area which has significant contamination and causes flooding problems

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**Post MIR Site WEST GLEN ROAD**

<b>Title</b>	<b>Second Name</b>	<b>Organisation</b>
Mr	Chandler	Private Individual
Mr & Mrs	Monaghan	Private Individual
Mr	Watson	Private Individual

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**Response** Opposition to the re-zoning of the land at West Glen Road in Kilmacolm from Green Belt to housing in the Inverclyde Local Development Plan for the following reasons:

- there is no need to deliver additional housing in Kilmacolm
- the site is on the Green Belt within the Kilmacolm boundary
- the development of the site will be detrimental to the village
- it is undesirable to string development around the sharp corner and up the brae
- the elevation of the site would have the effect of replacing the pleasing horizon of trees and shrubs with bricks and mortar
- potential problems with the drainage during periods of heavy rainfall
- the potential risks of buildings close to the large reservoir situated above this site
- to grant permission on this site could lead to much larger and more obtrusive developments in the future
- the site is visually separate from the dwellings which form the existing village boundary
- the existing trees that surround the site are in poor condition and have a limited life. Any felling would make the houses more visible

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# Representations from National and Local Bodies

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<b>Title</b>	<b>Second Name</b>	<b>Organisation</b>	<b>Representing</b>
Mr	Woodrow	CB Richard Ellis	Sanmina SCI
<p>-supports the proposed spatial strategy, optimising brownfield developments in the built up area -opposes sites put forward which are within the Greenbelt</p>			
Mr	Woodward	Clyde Muirshiel Regional Park	
<p>-it is considered that the part of the Ravensraig Hospital site outwith the hospital area is not suitable for housing development -the Park does not think that the Dunrod West site is suitable for development -the Park does not think that the Site 44 (Cloch Road) is suitable for housing development, but supports the proposed changes to the Green belt at Faulds Park.</p>			
Mr	Cahill	East Renfrewshire Council	
<p>- supportive of the broad strategy in the MIR</p>			
Mr	Cameron	Kilmacolm Civic Trust	
<p>-note and are pleased that sites at North Denniston Farm and Bridge of Weir Road have been withdrawn from consideration for development -there is no need to develop additional housing at Park Road and Hazelmere Road, consider that the Green Belt boundary should reflect the SINC boundary, views from Birkmyre Park would be lost, the site is prone to flooding and the water supply and effluent disposal capacity is limited -there is no need to develop additional housing at West Glen Road, the site is large enough to accommodate one large or several houses of moderate size, its development would constitute ribbon development setting a precedent for development on the opposite side of the road and the water supply and effluent disposal capacity is limited -there is no need to develop additional housing on the Green Belt land at Smithy Brae, enabling policy is specifically for historic and listed buildings, a precedent would be created if development were permitted on this field and access and egress problems at Smithy Brae would result -support is given for the development of the remainder of Smithy Brae within the settlement boundary</p>			
Mrs	Calvert	Kilmacolm Community Council	
<p>-supports the proposal that the two sites at Hazelmere Road should be re-classified as Green Belt because of their susceptibility to flooding, their nature conservation value, their landscape importance and there is no present need for additional housing -it would not be desirable to extend the settlement boundary to include West Glen Road as it would amount to ribbon development, the existing trees that surround the site are likely to be lost in a short time and housing requirements can be met from within the defined settlement boundaries -opposes the re-classification of that part of the Smithy Brae site which is currently Green Belt as it would mean partially infilling one of the sensitive Green Belt wedges, because of the access problems and that housing requirements can be met from within the defined settlement boundaries -welcomes the deletion of the of the sites at North Denniston Farm and Bridge of Weir Road from consideration for development</p>			
Mr	McCallum	Millpond Development (Kilmacolm) Ltd.	
<p>- corrects the ownership details of sites KC011 and KC008 and notes that the company is content with the new designation.</p>			

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<b>Title</b>	<b>Second Name</b>	<b>Organisation</b>	<b>Representing</b>
Ms	Mitchell	Network Rail	<p>-supportive of the approach which places a strong emphasis on sustainable locations for new developments which have good access to public transport, provided that consideration is given to the impact on the existing rail network (Ravenscraig Hospital). Developer contributions may be required in accordance with Circular 1/2010.</p> <p>-recommend that the developer's contributions policy in the LDP and any Supplementary Planning Guidance includes provision for rail</p>
Mr	Darracott	Renfrewshire Council	<p>- offered no comments on the LDP consultation</p>
Mr	Fotheringham	Scottish Environmental Protection Agency	<p>-preference should be given to the development/regeneration of brownfield sites over the release of greenfield sites</p> <p>-generic advice has been given on matters of Flood Risk, Water Environment (Controlled Activities) Scotland Regulations and general drainage issues.</p>
Mr	Pallant	Scottish Government (Historic Scotland & Transport Scotland)	<p>-any development on the Hazelmere Road site may affect the setting of the B listed building at Nether Knockbuckle</p> <p>-any development at Smithy Brae would need to consider the impact on the nearby listed buildings</p> <p>-any development at Ravenscraig Hospital should reuse the listed buildings, and consideration should be given to the impact upon the setting of the listed buildings and scheduled monument</p> <p>-consideration should be given to the impact of any development at Bankfoot Farm on the setting of the Ardgowan Inventory designed landscape</p> <p>-the cumulative impact of the development of sites on the trunk road needs to be considered</p> <p>-consideration of the impact of development on the access onto the A8(T) at Bogston Lane and the impact upon trunk road drainage would need to be addressed</p> <p>-consideration of the impact of development on the access onto the A78(T) at Ravenscraig Hospital and the impact upon trunk road drainage would need to be addressed</p> <p>-consideration of the impact of development on the access onto the A78(T) at Flatterton Farm would need to be addressed</p> <p>-access to the site at Dunrod West should not be taken directly from the strategic road</p> <p>-consideration of the impact of development on the access onto the A78(T) at Berfern and Finnock Bog Farm East would need to be addressed</p> <p>-consideration of the impact of development on the A78(T)/A770 roundabout at Bankfoot Farm would need to be addressed</p>

<b>Title</b>	<b>Second Name</b>	<b>Organisation</b>	<b>Representing</b>
Mr	Keller	Scottish Natural Heritage	
<p>-Sites 35 and 36 (Park Road and Hazelmere Road, Kilmacolm) – object to a housing allocation on the site, unless it did not affect the integrity of the SINC.</p> <p>-Site 37 (West Glen Road, Kilmacolm) – considers that the site may be within the hydrological catchment of the nearby Glen Moss SSSI, and any proposal for housing should be supported by a detailed assessment to ensure that there were no negative consequences in terms of hydrology or contamination.</p> <p>-Site 38 (Smithy Brae, Kilmacolm) – No comments.</p> <p>-Site 39 (Dougliehill, Port Glasgow) – No comments.</p> <p>-Site 40 (Bogston Lane, Greenock) – No comments.</p> <p>-Site 41 (Ravenscraig Hospital, Greenock) – the site is fringed by access routes that are part of the Core Paths Plan, resulting in potential significant impacts on the landscape and visual amenity and recreational amenity of the area.</p> <p>-Site 42 (Flatterton Farm, Greenock) – No comments.</p> <p>-Site 43 (Dunrod West, Greenock) – potential negative impact for the Regional Park's landscape and visual amenity and its recreational access potential.</p> <p>-Site 44 (Cloch Road, Gourrock) – potential negative impact for the Regional Park's landscape and visual amenity and its recreational access potential.</p> <p>-Site 45 (Berfern, Inverkip) – No comments.</p> <p>-Site 46 (Finnock Bog Farm East, Inverkip) – No comments.</p> <p>-Site 47 (Bankfoot Farm, Greenock) – Potential negative consequences due to part of the Core Paths network running through the site and potentially restricting recreational access.</p>			
Ms	MacKay	Strathclyde Partnership for Transport	
<p>-are willing to provide an analysis of bus service provision for all of the additional suggested development sites</p> <p>-agree with assessment for Drumfrochar Road, but note that the site is 800m from the railway station</p> <p>-agree with bus service frequency for Hazelmere Road East and West and West Glen Road, but considers that the services are too remote and could result in unsustainable travel patterns to access basic services</p> <p>-the site at Smithy Brae is within easy reach of bus services</p> <p>-agree with the bus service frequency for Dougliehill, but considers that the services will be unattractive due to the gradient and walk distance</p> <p>-the location of the sites at Bogston Lane and Ravenscraig Hospital will make public transport use an attractive mode of travel</p> <p>-agree with bus service frequency for Flatterton Farm, but note that services operate on Braeside Road rather than Flatterton Road</p> <p>-the site at Dunrod West is remote from existing public transport networks. Also note previous comments on this site in MIR response.</p> <p>-agree with assessment for Cloch Road</p> <p>-agree with bus service frequency for Berfern and Finnock Bog Farm East, but considers that the services are too remote and could result in unsustainable travel patterns to access basic services</p> <p>-the nearest bus stops are some distance away from the site at Bankfoot Farm, although if it is possible to provide bus stops in the vicinity of the site, there are services operating on the A78/A770</p>			
Ms	Streater	The Coal Authority	
<p>- no specific comments to make</p>			
Ms	Freeman	The Theatre Trust	
<p>- offered no comments on the LDP consultation</p>			

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# Responses from the Consultation Authorities on the SEA

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**Organisation** Historic Scotland

- No additional comments on the methodology or approach taken within the assessment itself.
- Welcome the inclusion of the Constraints Maps, but note that they do not include the designation of Inventory designed landscapes.
- Content with the findings of the assessment for cultural heritage.
- Site 36 (Hazelmere Road, Kilmacolm – reference could be made to the need to consider impacts on the setting of the B listed building on the adjacent site to the north.
- Site 38 (Smithy Brae, Kilmacolm) – clarification of the reference to the 'loss of prominent central building' as it is not a listed building and is not in a conservation area.
- Site 41 (Ravenscraig Hospital) – further clarification on the predicted impact would be useful, and suggest that the reuse of the listed building and conservation of its setting would have a positive impact. There is no reference to the existence of the Loch Thom-Overton water cut scheduled monument.

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**Organisation** Scottish Environment Protection Agency (SEPA)

- This ER addendum concisely and consistently identifies potential environmental issues associated with the potential developments.
- In regard to flood risk management, clarity could be improved if the principle of avoidance of flood risk for any potential development site is recognised in the first instance.
- Consider that potential flood risk should be identified in the constraints maps as it would identify potential limitations with regard to site layout and design.

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**Organisation** Scottish Natural Heritage (SNH)

- Sites 35 and 36 (Park Road and Hazelmere Road, Kilmacolm) - Considers that, in terms of Climatic Factors, the building of houses would be likely to have negative consequences for carbon capture and storage potential of the habitat currently present.
  - Site 37 (West Glen Road, Kilmacolm) – agree with most of the conclusions reached in the SEA. However considers that the site may be within the hydrological catchment of the nearby Glen Moss SSSI, and it could therefore have negative consequences for the ability of the site's fen habitat to capture and store carbon. Suggest that the Climatic Factors and Inter-Relationship impacts should be assessed as being potentially negative.
  - Site 38 (Smithy Brae, Kilmacolm) – No comments.
  - Site 39 (Dougliehill, Port Glasgow) – No comments.
  - Site 40 (Bogston Lane, Greenock) – No comments.
  - Site 41 (Ravenscraig Hospital, Greenock) – Generally agree with the Council's assessment, but if recreational access was to be negatively affected by a housing development, impacts on Population, Human and Health factors may not be entirely positive.
  - Site 42 (Flatterton Farm, Greenock) – No comments.
  - Site 43 (Dunrod West, Greenock) – Notes that the reference to the Regional Park is only identified with respect to potential impact on Biodiversity, Flora and Fauna. However SNH would agree with the conclusions reached in the other environmental issues.
  - Site 44 (Cloch Road, Gourrock) - Notes that the reference to the Regional Park is only identified with respect to potential impact on Biodiversity, Flora and Fauna. SNH question whether the impacts on Population, Human and Health would be entirely positive.
  - Site 45 (Berfern, Inverkip) – No comments.
  - Site 46 (Finnock Bog Farm East, Inverkip) – No comments.
  - Site 47 (Bankfoot Farm, Greenock) – Potential negative consequences for Population, Human and Health due to part of the Core Paths network running through the site and potentially restricting recreational access.
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