
Report To:	Environment and Regeneration Committee	Date:	31 October 2013
Report By:	Corporate Director Environment, Regeneration & Resources	Report No:	E&R/13/10 SJ/FJM/05
Contact Officer:	F J Macleod, Planning Policy & Property Manager	Contact No:	01475 712404
Subject:	Inverclyde Local Development Plan: Proposed Plan – Representations Made to the Plan and Issues for Examination		

1.0 PURPOSE

- 1.1 To inform Committee of representations received on the Inverclyde Local Development Plan: Proposed Plan following public consultation and to seek approval for the next stages of Plan preparation, including issues for Examination.

2.0 SUMMARY

- 2.1 The Inverclyde Local Development Plan: Proposed Plan was published for public consultation on 31 May and following the eight-week period which ended on 26 July, a total of 81 representations were received on the Plan, raising over 300 separate issues.
- 2.2 Having considered and categorised the issues, one third are in support of the Plan's strategy and/or policies and another third are of a more minor kind which can be readily handled internally. That leaves around 100 issues raising matters and indeed objections that cannot be resolved by negotiation and will be required to be resolved through the Examination.
- 2.3 The Planning system (2006 Act and 2009 Regulations) and the Scottish Government's Department for Planning and Environmental Appeals (DPEA) prescribe the next stages of Plan preparation. To assist the Reporter who will conduct the Examination, the outstanding unresolved issues require to be presented as Schedule 4s. Schedule 4s bring together linked representations through summarising the issues raised and outline the Council's response to those representations, including recommendations to assist the Reporter appointed to hold the Examination.
- 2.4 The most substantive issues relate to the Plan's housing development strategy and to linked issues around the effectiveness of the land supply, its overall adequacy, preference for brownfield development and the submission of alternative Green Belt release sites, particularly around Kilmacolm. The latter are few in number, while the largest number of representations relate to the proposed residential site at Smithy Brae in Kilmacolm.

3.0 RECOMMENDATIONS

- 3.1 That Committee:-
- note the scale and range of issues raised through representations received on the Proposed Plan, including the level of support for the Plan;
 - endorse the approach taken to summarising the substantive issues raised through the public consultation; and
 - approve the Schedule 4s (drafted in Annex 5) for the forthcoming Examination.

Aubrey Fawcett, Corporate Director Environment, Regeneration and Resources

4.0 BACKGROUND

- 4.1 The Inverclyde Local Development Plan: Proposed Plan was approved at the May committee for publication and public consultation. Consultation commenced on the 31st May for an eight-week period, concluding on 26 July. A total of 81 parties made representations on the Plan raising over 300 separate issues. **Min Ref: 02.05.13 para**
- 4.2 The number of representations received is to be welcomed, being considerably lower than previous levels at the finalised draft stage of a Plan. Two main reasons are suggested for this level of response: firstly, a reflection of the long and extensive engagement and consultation undertaken since 2009 through 2012 (before and after the Main Issues Report stage of Plan preparation) - the 'front-end loading' promoted by the new Planning system bearing fruit – with over 50 meetings held with different parties between MIR publication and April 2013 alone. During this time, agreement was reached with many of the key agencies over the content of the Plan, with the result that few are seeking changes. Secondly, without question the continuing flat economic situation and depressed housing market conditions are a factor influencing forward investment and development decisions.
- 4.3 In relation to the second reason above, it is significant that few representations were received from the business community, local traders and landowners, and most notably, no submission from 'Homes for Scotland', the house builders' representative body.
- 4.4 Summarizing the representations (refer to Annex 1), the issues raised range across many aspects of the Proposed Plan, including town centre policy and boundary changes; the proposed conservation areas at Kilmacolm and Gourrock; the promotion of additional Tree Preservation Orders; views on enabling development; and parking provision in Kilmacolm. **Annex 1**
- 4.5 The most substantive issues relate to the Plan's housing development strategy and to linked issues around the effectiveness of the land supply, its overall adequacy and the preference for brownfield development, with numerous comments on potential issues arising over the development of sites included in the Plan. More significantly, there are eight objections over the omission of housing development sites, four within the urban area and four requesting Green Belt release sites, three on the edge of Kilmacolm. The issue attracting the largest number of representations relates to the proposed adjustment to the Green Belt for residential development at Smithy Brae in Kilmacolm.
- 4.6 In addition to the low number of responses on the Plan, it is worth noting and welcoming that around one third of the issues raised are in support of the Plan's strategy and/or policies and another third are of a more minor kind which can be readily handled internally (refer to Annex 3). A number of responses make comment on the Plan's supporting documentation – Action Programme, Supplementary Guidance and Strategic Environmental Assessment (SEA) – which are recorded in Annex 4. That leaves around 100 issues raising matters and indeed objections that cannot be resolved by negotiation and will be required to be resolved through the Examination. **Annexes 2, 3 & 4**

5.0 PROPOSALS

- 5.1 The Planning system (2006 Act and 2009 Regulations) and the Scottish Government's Department of Planning and Environmental Appeals (DPEA) prescribe the next stages of development plan preparation. To assist the Independent Reporter, who will be appointed by the DPEA to conduct the Examination, the outstanding unresolved issues require to be presented as Schedule 4s.
- 5.2 Schedule 4s bring together linked representations through summarising the issues raised and outline the Council's response to those representations, including recommendations where appropriate, to assist the Reporter. The proposed Schedule 4s are in Annex 5 but it should be noted that these are still in *draft* as the DPEA still has a considerable say over how they are presented and packaged for the Reporter; the important point however is that the substantive responses to the issues and objections submitted should not change. If a change is required to a **Annex 5**

Schedule 4 following discussion with the DPEA, the Committee is asked to delegate authority to the Head of Regeneration and Planning to make any necessary amendments before submission to the appointed Reporter(s).

Issues in Schedule 4s for the Examination

- 5.3 A total of 20 Schedule 4s are outlined in Annex 5, organized according to the chapter structure of the Proposed Plan. As indicated, the most substantive issues are around housing development, with 6 Schedule 4s. Two of these are further sub-divided, those relating to representations made on Housing Sites in the Proposed Plan (Issue 7) are categorised by settlement; while Issue 9, Housing Sites **not** included in the Proposed Plan, are treated separately, comprising four submissions for Green Belt release and a grouping of four separate sites within the urban area where a case has been presented for their inclusion in the Plan.
- 5.4 The representations made criticising the LDP's Spatial Strategy, Housing Development Strategy, Housing Land Supply and the Council's approach to Affordable Housing Provision are all robustly defended, with no modifications proposed (refer to Issues 2, 4, 5 and 6). Similarly, the cases presented for release of the Green Belt for housing development, at Milton Wood; Old Hall, Quarry Drive; the Plots, Port Glasgow Road (all Kilmacolm); and Valley View Farm, Dougliehill Road, Port Glasgow, are rejected, largely on the grounds that there is either no strategic requirement for large scale release, or the specific proposals would have adverse environmental and landscape impacts. It is also recommended that the Council's position relating to the adjustment of the Green Belt to enable housing development at Smithy Brae is defended (refer to Issue 8).
- 5.5 Four proposals have been submitted for sites to be included as Residential Development Opportunities within the urban area, three of which are within the general residential policy area. The case presented to the Reporter for each site is to defend the policy in the Proposed Plan, which would allow for housing to be built if the amenity of the area is safeguarded. The fourth proposed site is within an Open Space policy area where the Local Review Body recently took a decision to refuse planning permission for residential development.
- 5.6 With respect to the other issues raised, these include the Plan's proposed changes to the Greenock town centre boundary, the proposed 'sequential approach' to assessing town centre/retail applications (under Issue 10), and a number of open space and tree preservation/woodland issues (refer Issues 14 and 15).
- 5.7 In conclusion, and having taken the advice of the Department of Planning and Environmental Appeals (DPEA), it is not proposed to make any changes to the LDP other than those minor (i.e. non-notifiable textual modifications) noted in Annex 3.
- 5.8 It is anticipated that the Examination will formally commence before the end of November. A public notice will be placed in the local press and placed on the Council's web site announcing the start of the Examination and all relevant parties who made representations to the Plan will be informed at that time.

Annex 3

6.0 IMPLICATIONS

- 6.1 **Legal:** at this stage there are none but this could change depending on whether the Reporter decides to have a Hearing (at which an objector and the Council make their case in public) and an objector decides to have legal representation. This potential outcome will not be known until the Examination is underway, sometime either later this year or early in 2014.
- 6.2 **Finance:** there are none as the costs of the Examination will be contained within the Service budget. As above, the actual cost will not be known until the size and scope of the Examination is concluded, however, an estimate will be sought at the time of the commencement of the Examination when the Schedule 4s are finally concluded and sent to the DEPA.

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 **Personnel:** there are none arising directly from this report.

6.4 **Equalities and diversity:** the Council's Equalities Policy has been taken fully into account in the preparation of the Proposed Plan and will continue to be so in the consideration of the issues arising through representations on the Plan and the Council's response to these issues.

6.5 **Repopulation:** the responses to the representations made on the Proposed Plan has had the SOA Repopulation Outcome Delivery Group's objectives and evolving Action Plans at the forefront in considering their potential implications for Inverclyde and any recommendations proposed for consideration by the Reporter at the Examination.

7.0 CONSULTATION

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

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

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

8.0 CONCLUSIONS

8.1 The public consultation held on the Proposed Plan has been generally successful in terms of the level of representations received, with broad support for much of the Plan and few significant objections. This is to be welcomed.

8.2 Two main reasons are suggested for the level of response. Firstly, the extensive engagement and consultation undertaken, including the large number of meetings held with different parties, during which agreement was reached with the key agencies and other parties over the content of the Plan. Secondly, the continuing flat economic situation and depressed housing market conditions are a factor influencing forward investment and development decisions, the latter perhaps explaining the number of surprising omissions from those parties making representations.

8.3 Despite the low numbers of representations, there are a number of not unexpected objections from those presenting a case for housing release in the Green Belt around Kilmacolm. However, these are fewer compared to the previous Local Plan and the Inquiry held in 2004. Representations have also been made for the Plan to have a more relaxed, generous land supply, with criticism of the scale of the effective housing land supply. Other issues raised include the Plan's proposed changes to the boundary of Greenock town centre and on a number of open space and tree preservation/woodland issues.

8.4 Subject to forthcoming meeting(s) with the DPEA, it is proposed that 20 Schedule 4s are presented to the appointed Reporter(s) for the Examination. It is expected that this next stage will conclude by the end of November, by which time the Examination will formally start. It is not proposed to make any significant (notifiable) modifications to the LDP in advance of the

Examination, but to leave that for the appointed Reporter(s). A public notice will be placed in the local press and placed on the Council's web site announcing the start of the Examination and all relevant parties who made representations to the Plan will be informed.

- 8.5 It is still uncertain what the timescale of the Examination will be, but the DPEA has indicated, from start to conclusion, including the Reporters' Report on the Examination, it should be no longer than 9 months and in our case, more likely to be less than 6 months. With a start date at the end of November, we should expect to be in a position to report back to Committee in May 2014, and I remain confident that we are still on target to adopt the first Inverclyde LDP in summer 2014, as set out in our first Development Plan Scheme (DPS), back in March 2009.

9.0 BACKGROUND PAPERS

- 9.1
- (1) Inverclyde Local Development Plan: Proposed Plan (May 2013)**
 - (2) Action Programme**
 - (3) Supplementary Guidance (5 documents)**
 - (4) Strategic Environmental Assessment (SEA)**
 - (5) Habitats Regulation Assessment (HRA)**
 - (6) Equality Impact Assessment (EiA)**

ATTACHMENTS

Annex 1: List of Respondents making Representations on the Proposed Plan and Issues Raised

Annex 2: Supporting Submissions and Other Comments Made on the Plan.

Annex 3: Non-notifiable Changes to Written Statement Text

Annex 4: Submissions Made to Supplementary Guidance, Action Programme, SEA and other Supporting Documentation

Annex 5: Schedule 4s for submission to the Examination (in draft, subject to final agreement with the DPEA)

Head of Regeneration and Planning
Municipal Buildings
Clyde Square
Greenock
PA15 1LY

File Ref: IC LDP-PP Reps and Sch 4 rpt (Oct '13) - 8 Oct. 2013

Annex 1: List of Respondents making Representations on the Proposed Plan and Issues Raised

1 Scottish Water

Development Strategy

Infrastructure

2 Asda Stores Ltd

Town Centres

3 Alan Connell

Housing Development Strategy

4 NHS Greater Glasgow and Clyde Valley

Housing site - Ravenscraig Hospital, Greenock

5 Alda Clark

Housing site - Smithy Brae, Kilmacolm

6 Belville Community Association

Housing site - Garvald St, Greenock

7 Alison Clark

Sustainable Access

8 North Ayrshire Council

Cross boundary policy areas

9 Inverclyde Tourist Group

Action Programme

Listed Buildings, Glebe Sugar Refinery, Greenock

Public Realm Ocean Terminal, Greenock

Tourism

10 Sanmina SCI

Development Strategy

Housing Policy

Major Areas of Change (Spango Valley, Greenock)

Major Areas of Change Policy MAC1-7

Supplementary Guidance: Local Development Frameworks - Spango Valley, Greenock

11 Ann Ferris

Development Strategy

Green Belt Boundary

12 Archibald Brown (Friends of Milton Wood)

Designation of Tree Preservation Order

Development Strategy

Green Belt Boundary

13 Barry MacPhail

Housing sites - Cloch Road & Levan Farm, Gourock

14 Billy Pickett

Designation of Tree Preservation Order

Development Strategy

Gardens and Designed Landscapes

Green Belt Boundary

15 Scottish Environmental Protection Agency

Infrastructure

16 Shaun Law

Housing site - Dunvegan Avenue, Gourock

17 Bryon Evans (Friends of Milton Woods)

Development Strategy

Green Belt Boundary

18 Gallagher Developments

Town Centres

19 Catherine Harbon

Housing sites - Former Kilmacolm Institute & Smithy Brae, Kilmacolm

20 Persimmon Homes

Affordable Housing

Development Strategy

Energy Efficiency Policy

Housing in the Green Belt

Housing Land Supply

Supplementary Guidance: Affordable Housing, Green Network & Planning Application Advice Notes

21 Cllr Ciano Rebecchi

Housing sites - Inverkip Power Station, Former Ravenscraig School & Former St Gabriel's School, Greenock

Major Areas of Change (Spango Valley, Greenock)

22 Inverclyde Renewables LLP

Development Strategy

Environmental Designations

Infrastructure

Supplementary Guidance: Renewable Energy

23 Scottish Power

Major Areas of Change (Inverkip Power Station)

Supplementary Guidance: Local Development Frameworks

24 David Eagle

Housing sites - Kilmacolm (inc Smithy Brae & Former Quarry)

Private and Affordable Housing Kilmacolm

25 Clydeport

Affordable Housing

Housing sites - Kingston Dock, Port Glasgow & Union Street, Greenock

Major Areas of Change (James Watt Dock & The Harbours, Greenock)

Strategic Economic Locations

Supplementary Guidance: Local Development Frameworks

26 Glasgow City Council

Miscellaneous

27 David Walker

Designation of Tree Preservation Order

Development Strategy

Enabling Development

Green Belt Boundary

28 Cllr David Wilson

Conservation Areas

Development Strategy

Economy and Employment

Gardens and Designed Landscapes

Housing sites - Leperstone Avenue, Whitelea Road, Lochwinnoch Road, Balrossie, Former Quarry, The Plots, & Smithy Brae, Kilmacolm & Woodside Care Home, Quarriers Village

Major Areas of Change

Miscellaneous

29 Diane Rebecchi

Housing site - Former St Gabriel's School, Greenock

30 Donna Pickett (Friends of Milton Wood)

Designation of Tree Preservation Order

Development Strategy

Gardens and Designed Landscapes

Green Belt Boundary

31 Inverkip and Wemyss Bay Community Council

Community Opportunities

Major Areas of Change (Inverkip Power Station)

Miscellaneous

Renewable Energy

32 Graham Biggart

Designation of Tree Preservation Order

Development Strategy

Enabling Development

Green Belt Boundary

33 Helen Spragg

Brownfield Sites

34 Henry Craig

Housing site - Kirn Drive, Gourrock

35 Ian McCallum

Green Belt Boundary

36 Cllr Innes Nelson

Major Areas of Change (Inverkip Power Station & Spango Valley, Greenock)

37 Cardwell Bay & Greenock West Community Council

Business and Industrial opportunities

Conservation Areas

Environmental Designations

Housing sites - Former Greenock Academy, Former Holy Cross School, Union Street, Greenock. Riverside Gardens & Cove Road, Gourrock

Major Areas of Change (Gourrock Bay)

Transport and Connectivity

Tree Preservation Orders

38 Isobel Evans (Friends of Milton Woods)

Development Strategy

Green Belt Boundary

39 James Delaney

Housing site - Lower Mary Street, Port Glasgow

40 James Fraser-Campbell

Housing site - Milton Wood, Kilmacolm

41 Johanna Iannetta

Housing site - Smithy Brae, Kilmacolm

42 Save Your Regional Park

Infrastructure

Renewable Energy Developments

43 Greenock Unit Trust

Action Programme

Major Areas of Change (Spango Valley, Greenock)

Supplementary Guidance: Local Development Frameworks - Spango Valley, Greenock

44 Kelvinside Developments (Aberdeen) Limited

Local Centres

45 Mr & Mrs Crighton

Development Strategy

Green Belt Boundary

Housing Policy

Housing site - Valley View Farm, by Port Glasgow

Residential Development in the Green Belt and Countryside

46 John Watson

Affordable Housing

Green Belt Boundary

Housing sites - Former Kilmacolm Institute, Smithy Brae, & Former Quarry, Kilmacolm

47 Julian Barr

Housing site - Leperstone Avenue, Kilmacolm

48 Katrin Eagle

Housing sites - Former Kilmacolm Institute & Smithy Brae, Kilmacolm

49 Owners of Plots sites, Kilmacolm

Housing site - The Plots, Kilmacolm

50 Scottish Government

Development Strategy

Energy Efficiency Policy

Housing Policy

Housing sites - Broadfield Hospital, Port Glasgow, Ravenscraig Hospital, Greenock. The Glebe & Kip Marina, Inverkip

Infrastructure

Major Areas of Change and Potential Change

Purpose, Process and Policy Contexts

Transport and Connectivity

51 Lilian Newman

Consultation Process

Housing site - Garvald St, Greenock

52 Lynda Connell

Development Strategy

Green Belt Boundary

53 Mark Beverstock

Housing site - Smithy Brae, Kilmacolm

54 Mary McCully

Housing site - Broadstone Hospital, Port Glasgow

55 Mactaggart & Mickel Homes Ltd

Development Strategy

Green Belt Boundary

Housing Land Supply

Housing site - Old Hall, Kilmacolm

Housing sites

Housing Strategy

Open Space

56 Mr & Mrs Perry

Housing site - Balrossie, by Kilmacolm

57 Mr & Mrs Stevenson

Housing site - Smithy Brae, Kilmacolm

58 Patricia Mulholland

Housing site - Kirn Drive, Gourrock

59 Mr Timoney

Housing site - Barrs Brae, Port Glasgow

60 Merchant Homes

Housing site - Cloch Road, Gourrock

61 Braeside Residents and Tenants

Housing sites - Former St Gabriel's School & Former Ravenscraig School, Greenock

62 Ralph Leishman

Development Strategy

Gardens and Designed Landscapes

Green Belt Boundary

63 Kilmacolm Civic Trust

Archaeology

Conservation Areas

Enabling Development

Gardens and Designed Landscapes

Green Belt Boundary

Housing Development Strategy

Housing sites - Gillburn Road, Leperstone Avenue, Whitelea Road, Smithy Brae, Lochwinnoch Road, Balrossie & Former Quarry, Kilmacolm & Woodside Care Home, Quarriers Village

Renewable Energy Developments

Residential Development in the Green Belt and Countryside

Transport and Connectivity

64 The Theatres Trust

Town Centres

65 Rosemary Biggart

Designation of Tree Preservation Order

Development Strategy

Gardens and Designed Landscapes

Green Belt Boundary

66 Scottish Natural Heritage

Action Programme

Biodiversity

Development Strategy

Environmental Designations

Green Network, including Figure 8.2

Supplementary Guidance: Green Network & Renewable Energy

67 Ross Wood

Housing site - Smithy Brae, Kilmacolm

68 SportScotland

Open Space

Supplementary Guidance: Green Network

Sustainable Access

69 Sharon Lyon

Major Areas of Change and Potential Change

70 Simon Hutton

Consultation Process

Housing site - Lower Mary Street, Port Glasgow

71 Kilmacolm Community Council

Conservation Areas

Enabling Development

Housing sites (including Balrossie & Smithy Brae, Kilmacolm)

Transport and Connectivity

72 Aldi Stores Ltd.

Town Centres

73 Duchal Estate

Development Strategy

Gardens and Designed Landscapes

Green Belt Boundary

Housing site - Milton Wood, Kilmacolm

74 Renfrewshire Council

Development Strategy

75 Stuart McMillan MSP

Green Network

Major Areas of Change (Inverkip Power Station & Spango Valley & John Street, Greenock)

76 Susan Biggart

Designation of Tree Preservation Order

Development Strategy

Gardens and Designed Landscapes

Green Belt Boundary

77 Thomas Owen

Housing site - Leperstone Avenue, Kilmacolm

78 RSPB Scotland

Biodiversity

Development Strategy

Environmental Designations

Infrastructure

Supplementary Guidance: Green Network, Local Development Frameworks & Renewable Energy

Tourism

Water policy

79 Tom Fyfe

Housing sites - The Plots & Smithy Brae, Kilmacolm

80 Mr & Mrs Ramsay

Housing site - Kirn Drive, Gourrock

81 SPT

Action Programme

Supplementary Guidance: Green Network, Local Development Frameworks & Planning Application Advice Notes

Tourism

Transport and Connectivity

ANNEX 2: SUPPORTING SUBMISSIONS AND OTHER COMMENTS MADE ON THE PLAN

NUMBER	ORGANISATION	ISSUE TOPIC	REPRESENTATION	COMMENT
1	Scottish Water	Redevelopment of Brownfield Land and Flooding and Flood Risk Management	<p>Remain fully committed to working with the Council to deliver an effective planning system that stimulates and delivers sustainable economic growth.</p> <p>Funded to provide strategic capacity for domestic growth within Scotland. Will continue to work with the Council to ensure development is in the right place and can be supported at the right time. Encourage early pre-engagement consultations with developers to discuss their needs and the consideration of surface water management at an early stage in the process.</p> <p>There are clear benefits from utilising existing gap and brown-field sites, including quicker access to existing infrastructure, however appreciate this is not always appropriate or practical and emphasise that, while strongly support the maximum utilisation of existing infrastructure capacity, also fully committed to providing strategic capacity to meet the needs of domestic growth.</p> <p>The provision of new or upgraded treatment capacity can present significant challenges in terms of timescales. To minimise this will continue to work with Developers, SEPA and the Council to accommodate development needs wherever practical until additional capacity and infrastructure comes on line.</p> <p>Would like to emphasise the importance of an effective surface water management plan at site level which developers should ensure is a primary consideration at an early point in the planning process.</p>	Noted

NUMBER	ORGANISATION	ISSUE TOPIC	REPRESENTATION	COMMENT
4	NHS Greater Glasgow and Clyde Valley	Residential Development Opportunities	Welcome the inclusion of Ravenscraig Hospital, Greenock in Schedule 6.1: Residential Development Opportunities, including the 25% affordable housing contribution 'quota' of 50 units.	Support
8	North Ayrshire Council	Green Network	There is a need for greater partnership working between the two Councils on CSGN within CMRP	Noted
8	North Ayrshire Council	Renewable Energy	There is a need for greater partnership between the two Councils on wind turbine development in CMRP	Noted
9	Inverclyde Tourist Group	Listed Buildings	Efforts should be redoubled to improve the appearance of the Glebe Sugar Refinery to ensure it doesn't become dangerous and require to be demolished, losing part of the heritage fabric which is increasingly important to tourism. Suggestion that the building could be converted into a museum complex.	Noted
9	Inverclyde Tourist Group	Tourism	Recommend that the Council invite Aldi to partner them in the enhancement of the area around the former Glebe sugar refinery building to improve the experience of visitors to Greenock Ocean Terminal.	Noted
9	Inverclyde Tourist Group	Tourism	The LDP should note the aspiration for a custom built passenger terminal at Greenock Ocean Terminal and an extended dock area to accommodate more visiting cruise liners.	Noted
9	Inverclyde Tourist Group	Tourism	Appreciates all the developments that have taken place in the sailing and boating activity and hopes that further growth will continue.	Support
9	Inverclyde	Transport	Supports the safeguarding and enhancement of the transport network and	Support and

NUMBER	ORGANISATION	ISSUE TOPIC	REPRESENTATION	COMMENT
	Tourist Group		routes for sustainable access. Recommends improvement to signage, taxi ranks and car parks.	Noted
9	Inverclyde Tourist Group	Tourism	In addition to the siting of caravan parks, all other building projects require to consider the implications for visitors to the area.	Noted
9	Inverclyde Tourist Group	Tourism	Other tourism opportunities should be given consideration by the Council, including creation of local viewpoints, celebrations of Inverclyde's heritage, the development of a 'one stop shop' and improvements to the Esplanade for tourists.	Noted
10	Sanmina SCI	A Sustainable Development Strategy	Page 10, Para 2.11 – welcome the promotion of the regeneration and re-use of brownfield land within the urban areas. The site in Spango Valley is an ideal brownfield site ready for future development and offers a significant opportunity for the development of a mix of uses. It has existing transport infrastructure in the form of a major road junction and access to the IBM train station which gives access to Greenock, Wemyss Bay, Paisley and Glasgow.	Support
10	Sanmina SCI	A Sustainable Development Strategy	Policy SDS2 – welcome the inclusion of the policy, as it confirms the support given to retaining the IBM train station which will serve the entire Spango Valley Major Area of Change. This will provide a significant sustainable mode of transport from this peripheral site to the main conurbation.	Support
10	Sanmina SCI	Major Areas of Change	Page 21, Para 3.4 – welcomes the designation of Spango Valley as one of the 7 Major Areas of Change. Our client's site, and indeed the remainder of the Spango Valley designation, offers a fantastic opportunity for new development with the potential for a mix of uses that will benefit the wider	Support

NUMBER	ORGANISATION	ISSUE TOPIC	REPRESENTATION	COMMENT
			area through future investment and the potential to provide new jobs and/or homes to the people of Inverclyde.	
15	SEPA	Waste	Policy INF3 – acknowledge the plan does not see the need for the creation of additional waste management facilities in the area and any proposed sites will be assessed against criteria of this policy. Highlight that point (b) may be disputed as the proximity principle is no longer deemed an essential consideration.	Noted
15	SEPA	Flooding and Flood Risk Management	Policy INF4 – Reiterate that the ‘avoidance principle’ should be at the forefront of any flood risk policy and mitigation measures would only be acceptable on sites identified by the Planning Authority as ‘brownfield’ and/or located within the developed floodplain’.	Noted
18	Gallagher Developments	Town Centres	It is not entirely clear from the Proposals Map, that the Port Glasgow Waterfront (West) site falls within the Port Glasgow town centre boundary.	Noted
25	Clydeport Operations Limited	Residential Development Opportunities	Supports the inclusion of Kingston Dock as a Residential Development Opportunity site	Support
25	Clydeport Operations Limited	Strategic Economic Location	Supports the designation of the site at Inchgreen, Greenock as a Strategic Economic Location and states that the site has potential to be utilised for marine engineering purposes and renewable uses.	Support and Noted
26	Glasgow City Council	LDP	LDP does not raise issues that would potentially adversely impact on Glasgow.	Noted

NUMBER	ORGANISATION	ISSUE TOPIC	REPRESENTATION	COMMENT
28	Cllr David Wilson	Residential Development Opportunities	Supports Residential Development Opportunities at sites 61 (Whitelea Road, Kilmacolm) and site 62 (Lochwinnoch Road, Kilmacolm)	Support
28	Cllr David Wilson	Sustainable Development Strategy	The Council's Green Charter should be updated.	Noted
28	Cllr David Wilson	Sustainable Development Strategy	Agree with all the Major Area of Change sites.	Support
28	Cllr David Wilson	Business and Industry	Concentration should be on the private sector. Employment will only increase by making the private sector feel welcome.	Noted
31	Inverkip and Wemyss Bay Community Council	Major Area of Change	Support the capacity of 600 houses, and a mix of private and affordable houses on the former Inverkip Power Station site, being a reduction from the previous Plan, in addition to the urban village proposal with public access to the coastal path.	Support
31	Inverkip and Wemyss Bay Community Council	Community Facilities	Support the proposed new community facility.	Support
31	Inverkip and Wemyss Bay Community Council	Transport	There is limited access to public transport along certain stretches of the A78, with Hill Farm currently having no public transport provision. There is no pavement at Bridgend Cottages, nor along the shore side of the A78 from the marina, contrary to the principles in the Transport section of the LDP.	Noted

NUMBER	ORGANISATION	ISSUE TOPIC	REPRESENTATION	COMMENT
31	Inverkip and Wemyss Bay Community Council	Transport	Seek reduction of the speed limit on the A78 past the villages to extend the 40mph zone from Wemyss Bay to beyond Bridgend Cottages.	Noted
31	Inverkip and Wemyss Bay Community Council	Education	Concerned about the impact on schools provision for both primary and secondary schools.	Noted
31	Inverkip and Wemyss Bay Community Council	Health Care	Recommend that the Inverkip Power Station development include provision for health care.	Noted
31	Inverkip and Wemyss Bay Community Council		Support the proposal to extend the coastal path to Wemyss Bay and note the plans for the Power Station site to allow public access to this route.	Support and Noted
31	Inverkip and Wemyss Bay Community Council		Affordable housing has not happened at Langhouse Road, Inverkip, as identified in the previous plan and question whether the land is still designated as such, and if there are plans to extend the cemetery.	Noted
37	Cardwell Bay & Greenock West Community	Environmental Designations	Support proposal to review SINCs in Policy ENV1	Support

NUMBER	ORGANISATION	ISSUE TOPIC	REPRESENTATION	COMMENT
	Council			
37	Cardwell Bay & Greenock West Community Council	Conservation Areas	Support the extension of the Gourock Conservation Area.	Support
37	Cardwell Bay & Greenock West Community Council	Business and Industrial Areas	Support the designation of Fort Matilda Industrial Estate for small commercial units.	Support
37	Cardwell Bay & Greenock West Community Council	Tourism	In principle support tourism development, provided it does not impact upon the Gourock Bay areas itself. Support also for a hotel on condition that housing site r47 is reduced in numbers.	Support and Noted
50	Scottish Government	Listed Buildings	Ravenscraig Hospital - Historic Scotland welcome the redrawing of the boundary of the allocation, and note that there should be a presumption to retain and reuse the listed buildings. The impact on the setting of the listed building should be considered.	Noted
50	Scottish Government	Gardens & Designed Landscape	Former Broadfield Hospital - Historic Scotland note that a very small part of this development site is within the Finlaystone House Inventory GDL. The Proposals Map should be amended.	Noted
50	Scottish Government	Gardens & Designed Landscape	Kip Marina - the proposed development site is located within the boundary of the Ardgowan Inventory GDL. The Proposals Map should be amended. HS is aware of need for boundary review. Visual impact of the development	Noted

NUMBER	ORGANISATION	ISSUE TOPIC	REPRESENTATION	COMMENT
			should be reduced through screen planting.	
50	Scottish Government	Renewable Energy	Policy INF1 - Woodland Removal Policy, mentioned in ENV6, could also be referred to in INF1.	Noted
50	Scottish Government	Listed Buildings	The Glebe - The setting of Kirkbrae House, burial vault, should be considered.	Noted
50	Scottish Government	LDP	Note that Circular 1/2009 is being replaced and the new SPP and NPF3 are to be published in 2014. The adopted LDP should refer to the current documents.	Noted
50	Scottish Government	LDP	References to the "proposed" plan should be removed once the Plan has been adopted, and suggest that the timetable could be deleted.	Noted
50	Scottish Government	Housing and Communities	Note that there is no mention of Gypsies, Travellers, Show People or housing for older people in the Plan, and assume this was because the HNDA confirmed that there was no need.	Noted
63	Kilmacolm Civic Trust	Archaeology	Support inclusion of Policy HER6 'Development Affecting Archaeological Sites	Support
63	Kilmacolm Civic Trust	Residential Development Opportunities	No objection to the inclusion of site 61 (Whitelea Road, Kilmacolm) as a Residential Development Opportunity	Support
66	SNH	Environmental Designations	Support Policy ENV1 Designated Environmental Resources	Support

NUMBER	ORGANISATION	ISSUE TOPIC	REPRESENTATION	COMMENT
66	SNH	Environmental Designations	Welcome the inclusion of Policy ENV7 and that the policy makes strong safeguards for protected species	Support
66	SNH	Open Space	Welcome Policy ENV3. Support emphasis on safeguarding and seeking to enhance the green network. Particularly welcome that the policy highlights that the green network should be a core competent of any masterplan or local development framework. Would welcome opportunity to input to the development of these documents which will help ensure the green network is considered at an early stage in the design process, aiding delivery on the ground.	Support & Noted
66	SNH	Open Space	Policy SDS3 - particularly pleased that policy emphasises that Green Network principles should be embedded in all new development	Support
66	SNH	Open Space	Support Policy SDS4, particularly the safeguarding of existing routes and that renewal and regeneration areas are identified as a primary objective of Green Network planning.	Support
66	SNH	Figure 2.2	Recommend that the terms on the plan and key are clarified.	Noted
69	Ms Sharon Lyon	Economic Development and Tourism	The Cathcart Centre in Greenock should be moved to another more appropriate location as its presence may be detrimental to tourism.	Noted
71	Kilmacolm Community Council	Conservation Areas	Welcomes the principle of a proposed new conservation area for the Cross in Kilmacolm, with detailed consultation to follow.	Noted

ANNEX 3: NON-NOTIFIABLE CHANGES TO WRITTEN STATEMENT TEXT

NUMBER	ORGANISATION	ISSUE TOPIC	REPRESENTATION	COMMENT
9	Inverclyde Tourist Group	Tourism	Paragraph 4.19 - Request that the LDP acknowledges the 'Local Area Tourism Partnership'.	Agree
50	Scottish Government	Renewable Energy	Para 2.8 - Insert "the equivalent of" regarding the government's renewable energy target. This section should also refer to the target for Community Renewables.	Agree
50	Transport Scotland	Major Areas of Change	Extra paragraph inserted after 3.2 in the written statement and 2.2 in the Supplementary Guidance on Local Development Frameworks: "Many of the Major Areas of Change are located on the strategic road network and could therefore have an impact on the operation of these roads. This may require changes to, or provision of new infrastructure to support their development. Where this is an issue, early consultation with Transport Scotland should be undertaken to reach agreement on individual cumulative impact assessments and mitigation where required."	Agree
50	Transport Scotland	Managing the Transport Network	Paragraph 5.7 – reword to read: "5.7 SPP states that the strategic transport network – trunk roads, motorways and the rail network – is crucial to sustainable economic growth. Developments that could potentially affect its performance or safety should be appraised and, following early consultation with Transport Scotland and Network Rail if appropriate, mitigation measures put in place where necessary to ensure it continues to operate efficiently."	Agree

66	SNH	Environmental Designations	Figure 8.2 - believe there is an error; recommend that in the key the labels are the wrong way round.	Agree
68	SportScotland	Sustainable Access	Paragraph 5.9 – reword to read: “5.9 Sustainable outdoor access (primarily walking and cycling) requires good networks, in particular off-road routes, to move with relative ease around the area. Routes are used for both active travel and recreational pursuits, and therefore a dense network in and around settlements which link to the wider countryside is promoted to provide for both active travel and sport and recreation. The Core Paths Plan and in particular the promotion of the strategic linkages (National Routes 75 and 753 of the National Cycle Network and the completion of the Inverclyde Coastal Route), are at the heart of such a network, and have helped to encourage more active travel within, and increased associated tourism (day and short stay) to, Inverclyde. The enhancement and extension of this network will assist those who want to be more active in their travel, either in their leisure time or for their journey-to-work, to do so.”	Agree
68	SportScotland	Open Space	Paragraph 8.16 – reword to read: “8.16 Open spaces can often be difficult to define as they include everything from road verges to large public parks within towns and villages, but all contribute to a quality environment. Playing fields are included within this definition of open space, although their use differs from that of other forms of opens space, as they provide for the particular needs of sports including venues for training and matches. There will be a presumption against the redevelopment of playing fields unless proposals satisfy the particular requirements of paragraph 156 of SPP, as well as policies ENV4 and ENV5. Two open space audits have recently been completed for the settlements within Inverclyde, with the Proposals Map identifying open spaces over 0.1ha, as well as certain smaller areas considered to be of local importance and other significant parts of the Green Network. All other open spaces are also protected through policy, but are too numerous to identify on the Proposals Map .”	Agree

78	RSPB Scotland	Designated Environmental Resources	Paragraph 8.4 – reword to read: “8.11 Scotland’s obligations to comply with international agreements and protocols, is of particular significance in the protection of our natural heritage and safeguarding environmental quality. Sites classified as Special Protection Areas (SPAs) (under the Birds Directive) and Special Areas of Conservation (SACs) (under the Habitats Directive) are strictly protected. These sites are of European importance and are also referred to as Natura 2000 sites. Where a development plan could have an impact upon a Natura site, a Habitats Regulation Appraisal (HRA) needs to be prepared in accordance with the Conservation (Natural Habitats, &c.) Regulations 1994 as amended. Inverclyde Council has two such sites, Renfrewshire Heights SPA and the Inner Clyde Estuary, a SPA/Ramsar site.”	Agree

ANNEX 4: SUBMISSIONS MADE TO SUPPLEMENTARY GUIDANCE, ACTION PROGRAMME AND OTHER SUPPORTING DOCUMENTATION

NUMBER	ORGANISATION	REPRESENTATION	COMMENT
10	Sanmina SCI	<p>SG ‘Local Development Frameworks’ – Policy MAC7 ‘Spango Valley, south west Greenock (New Development Opportunity), pages 19-21: welcomes the inclusion of the site as a Major Area of Change in the LDP and as detailed in the SG. Under ‘Current Planning Status’, seek the removal of the reference (3rd paragraph) to the Sanmina site being more similar to areas designated as ‘Areas of Potential Change’. Do not agree that the SG should have any reference to it being so designated, as this is contradictory and could lead to confusion as to the actual position of the site in the LDP. Suggest rewording in the final paragraph on page 19 as follows: “The vacant land to the south west, owned by Sanmina, offers an opportunity for a mix of development proposals, although no active proposals are currently under detailed consideration. The landowner is however in discussion with the council and potential developers in relation to future development opportunities on the site in this regard.”</p>	Consider and discuss
10	Sanmina SCI	<p>SG ‘Local Development Frameworks’ - Page 20: welcome the reference associated with the site identifying it as the balance of the site, and offering a range of options for development. However, it is considered that the uses identified in the brackets under the designation are misleading and that text should be removed from the framework image. Providing text in the brackets indicates that the uses suggested have been discussed with the council and are the preferred uses for the site.</p> <p>It is considered that as there has been no significant detailed investigation into potential land uses, the text should refer to simply ‘a mix of uses will be considered, and that they should complement the existing land uses on adjacent sites.’ Sanmina is of the view that discussions on potential uses are at such an early stage, it would</p>	Consider and discuss

		be misleading to identify any uses at this stage in the development of the site. In view of this, the text alongside reference 'D' for the plan should only read – 'Balance of Site – Range of Options for Development'.	
20	Persimmon Homes	SG 'Green Network' - pg 14: the GN SG is not an appropriate location to communicate the requirements for a Design Statement. Should it differ from PAN 68 an additional document should be produced to provide clear advice on what is to be included in a Design Statement.	Disagree
20	Persimmon Homes	SG 'Affordable Housing Provision' – Policy RES4, page 9: this submission is directly linked to the Proposed Plan, with a change recommended to Policy RES4 (refer to Schedule 4 'Affordable Housing') to read that the 'quota approach' should state 'a maximum of 25% Affordable Housing Contribution', not 'a benchmark of 25%', to accord with Scottish Government Consultation Draft SPP 2013. It is submitted that this would better reflect "ongoing market conditions".	Disagree
20	Persimmon Homes	SG 'Planning Application Advice Note' (PAAN), No. 3, pages 9-10: based on guidance from other local authorities, along with Scottish Government Policies 'Designing Streets' and 'Designing Places', a number of changes with explanations are recommended, in relation to (i) 'Large Scale (Infill) or Greenfield / Edge of Settlement Site'; and (ii) 'Location of Play Areas'.	Consider and discuss
22	Inverclyde Renewables LLP	SG 'Renewable Energy' , Page 4 and diagrams: would like diagrams showing where there is significant protection, constraint and where development could be supported. Suggest changes to INF1. Suggest changed wording on page 6. Suggest changes to wording on page 7 and diagram 4. Object to inclusion of CMRP guidance in SG. Suggest changed wording on page 8. On page 9 the SG should not prejudice the development of large scale wind energy.	Disagree

23	Scottish Power	<p>SG ‘Local Development Framework’ – Policy MAC4 ‘Former Inverkip Power Station’, pages 11-13: acknowledge the policy support which is established for the Inverkip Power Station site and the range of uses which are established in the SG and which were established through the development framework. Are currently working towards resolving land ownership issues and we anticipate that this will happen prior to the adoption of the LDP. As such, request that the final line on page 11 is deleted and the paragraph amended to state:</p> <p>“Extensive community consultation and pre-application discussion with the owners, Scottish Power, led to the Development Framework/Masterplan and the submission of a planning application in principle in 2009, consent for which has now been granted.”</p>	Disagree
25	Clydeport Operations Ltd	<p>SG ‘Affordable Housing Provision’ – Annex 3, pages 21-23, (Policy RES4, Schedule 6.1): this submission is directly linked to the Proposed Plan, with two changes recommended under Policy RES4 to Schedule 6.1, which would require consequential changes in the SG to Annex 1, Section B, Tables 1(a) & 1(b), and Table 2; and Annex 3, Table 1. For site reference ‘r15’ James Watt Dock/Garvel Island, delete the affordable housing contribution (‘the quota’) of 125 – this should be ‘0’; and for site reference ‘r33’, Victoria/East India Harbour, delete the affordable housing contribution (‘the quota’) of 60 – this should be ‘0’.</p>	Disagree
25	Clydeport Operations Ltd	<p>SG ‘Local Development Frameworks’ – Major Areas of Change, MAC1 ‘The Harbours, Greenock’ (page 4) and MAC2 ‘James Watt Dock/Garvel Island, Greenock’ (page 8): under ‘Area Policy and Preferred Land Uses’, in terms of permitted land use (a) ‘Residential Flats’ in each MAC area, amend to read “residential”, thus ensuring that flexibility is promoted at every opportunity in an effort to encourage development at the earliest opportunity.</p>	Agree

43	Greenock Unit Trust	SG 'Local Development Frameworks' – Support the allocation of the client's site at Spango Valley as part of a Major Area of Change.	Support
43	Greenock Unit Trust	Action Programme – Support for the reference of the Spango Valley site in the Action Programme.	Support
66	Scottish Natural Heritage	SG 'Green Networks' - Overall support and welcome all changes made since first draft. Believe it will be a useful tool. Only query on evaluation of proposals submitted – recommend the inclusion of a sentence at the end of the appraisal sections to provide additional clarity for developers on the use of the site appraisal information; suggest text such as: “developers should demonstrate in their planning application submission how their proposals have responded to the findings of the site and context appraisal.”	Consider and discuss
66	Scottish Natural Heritage	SG 'Renewable Energy' : Welcome and recommend that on page 8 the reference to a "3km buffer." is removed. Do not agree turbines merge with the landscape at this distance but do agree topography can assist with visual containment of wind farms.	Consider and discuss
68	SportScotland	SG 'Green Network' - Support protection and enhancement of access routes. However, no specific policy exists which outlines the protection of playing fields as recommended in SPP and this should be addressed. Role of playing fields in delivery of formal sport is not considered. Recommend the addition of a policy for protection of playing fields as per SPP with reference to council's pitches strategy. Offer of financial assistance and partnership working to develop a Pitches Strategy.	Consider and discuss
78	RSPB	SG 'Green Network' – Support	Note

78	RSPB	SG 'Renewable Energy' - noting that biomass feedstocks are locally sourced, otherwise the negative impacts of this form of renewable energy on international forests can be significant.	Note
78	RSPB	SG 'Local Development Frameworks' – MAC4: Former Inverkip Power Station – this project would appear to destroy a SIMC. It is important that any Masterplan for the site should be consistent with Policy ENV1 (b) and include measures to compensate for the damage to the SINC.	Consider and discuss
81	Strathclyde Partnership for Transport	SG 'Green Network' - Support terms of the SG but suggest further emphasis is given to the connectivity aspect of the Green Network. Text suggested – “and to public transport hubs” at the end of bullet point 1.	Agree
81	Strathclyde Partnership for Transport	SG 'Local Development Frameworks' – MAC1 – add reference to existing public transport, to the need to facilitate pedestrian access to bus stops and the station and to the need to improve bus infrastructure at stops serving the site. MAC2 – supports the identification of pedestrian links to public transport services and include the need to the need to improve bus infrastructure at stops serving the site. MAC3 – add reference to the need to facilitate pedestrian access to bus stops and the station and to the need to improve bus infrastructure at stops serving the site. MAC4 - add reference to existing public transport, to the need to facilitate pedestrian access to bus stops and the station and to the need to improve bus infrastructure at stops serving the site. MAC7 – should include a requirement that the development addresses the limitations of public transport access. APC1 – support the need to improve pedestrian and cycling access routes and to the need to improve bus infrastructure at stops serving the site. APC2 – should include a requirement for developments to address the limitations of	Consider and discuss

		public transport access. DOS1 – notes the possible use as a park and ride facility and would be pleased to assist in consideration of this.	
81	Strathclyde Partnership for Transport	SG ‘Planning Application Advice Notes 1-11’ – no adverse representations, but would suggest that it would be useful to develop a PAAN to cover roads guidelines for development sites, taking account of ‘Designing Streets’.	Consider and discuss
81	Strathclyde Partnership for Transport	Action Programme – Page 2 (SDS2) – add SPT as a partner in providing advice and financial support for sustainable transport and the operation of bus services and infrastructure. Page 5 (SDS6) – add public sector agencies as partners. Page 10 (APC1-2) – SPT is committed to supporting the development frameworks. Page 14 (TRA2) – add SPT as a partner in providing advice and financial support. Page 15 (TRA3) – update timescale. The works were completed in April 2013.	Agree

Annex 5: Schedule 4s for Submission to the Examination

(in draft, subject to final agreement with the DPEA)

Issue Number, by LDP: Proposed Plan Chapter

Chapter 2 – A Sustainable Development Strategy

1. Climate Change
2. A Sustainable Spatial Strategy

Chapter 5 – Transport and Connectivity

3. Transport

Chapter 6 – Housing and Communities

4. Housing Development Strategy
5. Housing Land Supply and Residential Development Opportunities
6. Affordable Housing
7. Housing Sites in Proposed Plan:
 - (.1) Kilmacolm & Quarrier's Village
 - (.2) Port Glasgow
 - (.3) Greenock
 - (.4) Gourock & Wemyss Bay
8. Smithy Brae, Kilmacolm
9. Housing Sites not included in Proposed Plan:
 - (.1) Milton Wood (Police House Field site), Kilmacolm
 - (.2) Old Hall, off Quarry Drive, Kilmacolm
 - (.3) The Plots, Port Glasgow Road, Kilmacolm
 - (.4) Valley View Farm, Dougliehill Road, by Port Glasgow
 - (.5) Urban Sites: Barr's Brae, Port Glasgow; Dunvegan Avenue, Gourock; fmr Kilmacolm Institute, The Cross, Kilmacolm; and Gillburn Road, Kilmacolm

Chapter 7 - Town Centres and Retailing

10. Town Centres
11. Local Centres

Chapter 8 - Natural Heritage and Environmental Resources

12. Environmental Designations
13. Green Network
14. Open Space
15. Tree Preservation Orders

Chapter 9 - Built Environment and Townscape

16. Conservation Areas
17. Gardens and Designed Landscapes (Enabling Development)

Chapter 10 - Energy and Infrastructure

18. Renewable Energy
19. Energy Efficiency

Other Matters

20. Miscellaneous

Issue 1	Climate Change	
Development plan reference:	Chapter 2, Policy SDS1 (Climate Mitigation and Adaptation – Reducing Carbon and Energy Use)	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Persimmon Homes (20) Inverclyde Renewables LLP (22)		
Provision of the development plan to which the issue relates:	Policy SDS1 - Purpose and Scope	
Planning authority's summary of the representation(s):		
<p>Persimmon Homes (20) The development plan is not the right place for policies which relate to Buildings Standards matters. Energy efficiency and carbon reduction can be dealt with entirely through Building Standards, however the development plan should rightly concern itself with matters relating to site planning.</p> <p>Inverclyde Renewables LLP (22) The sustainability theme which underpins the LDP is noted and the desire to contribute towards the Scottish Government's climate change targets. There is also recognition that there are technologies which can make a positive contribution to the aims and objectives of the policy. There is an opportunity for the Council to show their full support for development which mitigates climate change by setting out a presumption in favour of such development in the policy in order to underpin the remainder of the LDP, and demonstrate the commitment to tackling climate change.</p>		
Modifications sought by those submitting representations:		
<p>Persimmon Homes (20) Policy SDS1 should be removed from this policy (sic) along with any related text.</p> <p>Inverclyde Renewables LLP (22) Policy SDS1 should be reworded, with text being inserted into the policy following "assisting in achieving renewable energy targets". The text to be inserted is "by establishing a positive planning policy framework for renewable energy developments".</p>		
Summary of responses (including reasons) by planning authority:		
<p>Persimmon Homes (20)</p> <ul style="list-style-type: none"> - the intention of the SDS policies is to set the context within which all development proposals will be considered - policy SDS1 is the highest level policy in the Plan - the policy links in to other policies in the Plan 		

- policy SDS1 supports a range of renewable energy technologies by guiding them to the right places

Inverclyde Renewables LLP (22)

- the policy is very clear in its aim to support renewable energy targets in line statutory requirements
- it is considered that the LDP policy framework is a positive one which balances development with protection/conservation
- to single out renewable energy developments as being within a 'positive planning policy framework' would suggest that other developments are secondary
- policy INF1 expresses support for renewable energy development in the appropriate locations

In accordance with the proposed LDP, the Council does not propose to amend Policy SDS1.

Reporter's conclusions:

Reporter's recommendations:

Issue 2	A Sustainable Spatial Strategy	
Development plan reference:	Chapter 2, Policies SDS5 & SDS8, paragraphs 2.44, 2.50 and 2.56	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Mr Alan Connell (3) Sanmina SCI (10) Ms Ann Ferris (11) Mr Archibald Brown (12) & Friends of Milton Wood (FoMW) * Mr Billy Pickett (14) * Mr Bryon Evans (17) & FoMW * Mr David Eagle (24) Mr David Walker (27) Mrs Donna Pickett (30) & FoMW Mr Graham Biggart (32) ** Mrs Isobel Evans (38) & FoMW * Mr & Mrs Crighton (45) Mrs Lynda Connell (52) * Mactaggart & Mickel Homes Ltd (55) Mr Ralph Leishman (62) * Ms Rosemary Biggart (65) Duchal Estate (73) Ms Susan Biggart (76)</p>		
Provision of the development plan to which the issue relates:	Policy of urban containment and defining the inner Green Belt boundary, with particular reference to the settlement of Kilmacolm.	
Planning authority's summary of the representation(s):		
<p><u>Mr Alan Connell</u> (3) <u>Ms Ann Ferris</u> (11) <u>Mr Archibald Brown</u> (12) & FoMW * <u>Mr Billy Pickett</u> (14) * <u>Mr Bryon Evans</u> (17) & FoMW * <u>Mr David Walker</u> (27) <u>Mrs Donna Pickett</u> (30) & FoMW <u>Mr Graham Biggart</u> (32) ** <u>Mrs Isobel Evans</u> (38) & FoMW * <u>Mrs Lynda Connell</u> (52) * <u>Mr Ralph Leishman</u> (62) * <u>Ms Rosemary Biggart</u> (65) <u>Ms Susan Biggart</u> (76)</p> <p>All the above submitted support for paragraphs 2.44 and 2.50 (in full).</p>		

Mr Graham Biggart (32)

The continuing protection of Kilmacolm's Greenbelt, as evidenced by the rejection earlier this year of a planning proposal that included a substantial school building, community car park and two-lane, paved road accessing these developments, and which threatened a distinctive Greenbelt wedge, has been welcomed by the community.

Delighted and relieved to note the continued protection of Green Belt in Kilmacolm and of Milton/Duchal Woods and its immediate surroundings. I find it particularly heartening, bearing in mind the history of continual pressure on this area and its surrounding environs for development.

Sanmina SCI (10)

Urban containment is the most appropriate way for the Council to approach their spatial strategy when there are so many sites such as the Spango Valley site which can be brought forward to meet the requirements of issues such as housing land supply.

Mr David Eagle (24)

The current LDP draft as it relates to Kilmacolm greenbelt is inconsistent with the council's own policies and does a poor job of balancing the needs of our village community with the financial desires of the developers and the various landowners. The council should do much more to ensure the protection of our valuable greenbelt and produce a revised plan which takes on board the opinions and ideas expressed in my submission (refer **Issues 5 & 6**), and better adheres to its own and Scottish Government planning policies.

Mr & Mrs Crighton (45)

In relation to representations submitted under **Issue 4** relating to Policy RES7 and Policy ENV2, it is submitted that there are consequential changes required to Policy SDS5, noting the caveat in the Scottish Government definition on 'Brownfield Land' in the Green Belt and Countryside areas, is suitable for development, while it is suggested Policy SDS5 is narrowly concerned with brownfield land within urban settlements only.

Mactaggart & Mickel Homes Ltd (55)

In relation to paragraph 2.44: If, through the LDP, economic growth throughout the LA area is promoted as well as regeneration of waterfront areas this will require a mix of economic and housing growth through support for existing sites and the re-allocation of sites no longer considered effective through the HLS Audit and LDP preparation process.

There is a clear and direct two-way relationship between housing growth and increasing employment opportunities. To maintain a prosperous economy the Council must encourage both. House building creates both direct and indirect

short term employment in terms of construction and longer term employment in terms of increasing the local labour supply and the need to provide services to meet the needs of the additional households. A successful house building industry helps to strengthen local economies and reduces unemployment. As an example Mactaggart & Mickel Homes Ltd has an excellent record of appointing apprentices and retaining them within the Firm.

Land will have to be allocated to meet the affordable housing shortfalls identified through the *Glasgow and the Clyde Valley Strategic Development Plan (2012)* and *Glasgow and the Clyde Valley Housing Need and Demand Assessment (HNDA)* (June 2011).

In relation to paragraph 2.50 (in relation to Kilmacolm & Quarrier's Village): as written, paragraph 2.50 creates a circular conflict. Affordable housing need is localised by nature and Kilmacolm is highlighted as a problem area for such housing and affordability in general. Well designed and laid out housing and associated uses could overcome landscape setting issues identified in the paragraph. However, without further housing growth – whether it be private or affordable – there will continue to be a lack of demand for public transport infrastructure and services and vice versa. It is wrong for the Proposed Plan to state that Kilmacolm has insufficient infrastructure to deal with further allocations. If this is a reference to public transport only, as stated above, new development will help to resolve that issue. Infrastructure covers a much wider range of matters and there are no other restrictions highlighted in Kilmacolm that would prevent new housing development.

Objection to Figure 2.3 'Spatial Strategy and Place Making' : this strategy actively encourages development to be restricted in Kilmacolm, this is unacceptable in a plan led system.

In relation to paragraph 2.56: Residential development of (Old Hall site) will have a minimal impact on Green Belt objectives at this location, development will form a natural extension to development fingers while not effecting (sic) the green wedges that come into the heart of the village allowing the village to maintain its green links. The opportunity for Brownfield development is severely limited in communities such as Kilmacolm; therefore, land is required to be removed from the Green Belt to allow development. As stated in SPP paragraph 159, "Green Belt designation should be used to direct development to suitable locations, not to prevent development from happening."

SPP further states that green belt boundaries in LDPs should reflect long term settlement strategy and ensure that settlements are able to accommodate planned growth. Inner boundaries should not be drawn too tightly around the urban edge, but where appropriate should create an area suitable for planned development between the existing settlement edge and green belt boundary. Boundaries should also take into account the need for development in smaller settlements within the green belt, and where appropriate leave room for expansion.

Duchal Estate (73)

Whilst acknowledging the provision in the Plan of a wide range of sustainable locations for new investment and development, including the seven 'MAC' policy areas, and that the Council considers with regards to small or new opportunities for investment, that these are in place too, it is stated that Kilmacolm, as one of the settlements within Inverclyde set aside from the Clyde Coast, it should be identified also for growth and investment. It is claimed that Kilmacolm, for the third Local Plan review, is not identified for development or investment. This, despite the population being some 5% of the overall population of Inverclyde. Kilmacolm is an attractive area and a desirable place to live. It is also evident that there is an immediate requirement for affordable housing and indeed, smaller retirement properties.

A case is made for Kilmacolm, like other settlements within the Renfrewshire Rural Area, where sites that are considered sustainable and effective and can be developed, should be released from the Green Belt. The example of Shillingworth in Renfrewshire is noted in this respect, as is Quarrier's Village in Inverclyde, where it is stated the latter has benefitted from residential development releases over recent Local Plan reviews.

Modifications sought by those submitting representations:

Mr David Eagle (24)

No need for any Green Belt release around Kilmacolm: remove sites 'r60' and 'r64' from Schedule 6.1 and reinstate the Green Belt to its current position (refer also to **Issues 7(.1)** and **8**).

Mr & Mrs Crighton (45)

Amend Policy SDS5 to accord with recommended changes to policies RES7 and ENV2, so that it is not solely concerned with brownfield land within the urban area (refer also to **Issue 9(.4)**).

Mactaggart & Mickel Homes Ltd (55)

Duchal Estate (73)

Need to increase the housing land supply, including the number of Effective Sites, and particularly in the Kilmacolm/Quarrier's Village part of the Renfrewshire SHMA (refer also to **Issue 5**).

Mactaggart & Mickel Homes Ltd (55)

Remove the label 'Restrict Development Footprint' in Figure 2.3, page 20.

Include the Old Hall site, off Quarry Drive, Kilmacolm in Schedule 6.1 and release as a housing development opportunity, to contribute to an increase in the Effective land supply (refer to **Issue 9(.2)**).

Duchal Estate (73)

Include the Police House Field, Milton Wood, off Lochwinnoch Road, Kilmacolm in

Schedule 6.1 and release as a housing development opportunity, to contribute to an increase in the Effective land supply (refer to **Issue 9(1)**).

Summary of responses (including reasons) by planning authority:

Mr & Mrs Crighton (45)

Policy SDS5: the purpose and intent of the SDS policies is to establish the 'big picture' spatial or development strategy for the LDP, one of its central aims being a preference for all appropriate development to be within the designated urban area, in sustainable locations after having conducted a Green Belt review (refer to Background Report). It is therefore inappropriate in such a 'higher-level' policy to include those special and indeed exceptional circumstances where development will be found to be permissible in the Green Belt and/or Countryside. Policies for dealing with these circumstances are covered in the relevant chapters of the LDP, sitting under and expanding in more detail on the Spatial Strategy chapter, for example Policies RES7 and ENV2 in chapters 6 and 8 respectively.

Mactaggart & Mickel Homes Ltd (55)

Figure 2.3: similarly, the purpose of this figure is to set out in graphic form (as encouraged by the 2006 Act), the main elements of the Spatial Strategy. Inevitably in such a diagram, a short hand is required with the labels to describe the main dimensions of Spatial Strategy.

Mr David Eagle (24)

Mactaggart & Mickel Homes Ltd (55)

Duchal Estate (73)

A spatial strategy is the 'higher-level' land use planning and development framework expected in the emerging new LDPs. Its purpose is, in the Scottish Government's well-quoted phrase, to indicate "where development should take place and identify where those areas that should not be developed." In doing so, a whole range of social, economic and in particular, environmental factors are taken into consideration, in coming to a final, balanced view, of where development land should be allocated to meet stated objectives.

It is the view of the Council that the overwhelming preference for development remains within those areas where there is both a need for development, primarily in terms of regeneration and urban renewal, and where there is the (wasted) land resource that is vacant, derelict and underused land. The LDP's Spatial Strategy describes these sustainable development aims and the MAC and APC policy areas give further spatial expression to the Strategy. The Reporter's conclusions from the 2004 LPI are relevant in this respect, referring to the settlement strategy then, as it relates to Kilmacolm, that while "there is a need to sustain a balance between the containment and growth of urban development on a long term basis (this) relates to the stability and endurance of green belt policies and not necessarily to each individual settlement" (Volume 2: Housing, page 98, para 7.158A).

A small number of adjustments to the adopted Local Plan Green Belt around Kilmacolm have been considered sufficient to accommodate the anticipated build rate in this area over the Plan Period, without adversely impacting on the landscape setting and in particular, undermining the sensitive green wedges that penetrate into the heart of Kilmacolm (refer also to **Issues 4 & 5**).

Mactaggart & Mickel Homes Ltd (55)

Duchal Estate (73)

It is inappropriate in terms of overall assessed demands and needs for housing, to have an equality of land release to meet these requirements: that would be the antithesis of development planning and the first principle of the Scottish Government's objective for development plans. The planning system and this Council through this LDP is as much concerned with safeguarding and protecting, where necessary, the best of its natural and built heritage, and valued landscapes, as it is making provision in the right locations for development. It is the Council's view that Kilmacolm and Quarrier's Village within their landscape and countryside settings are more important to protect than making adjustments and releasing land for development, when importantly there is no strategic and incontrovertible requirement to do so.

The 'green wedges' are vital to retaining the setting of Kilmacolm, including the Old Hall site and the proposed extensive development in Milton Wood. The full responses to the representations made on Milton Wood and Old Hall are covered under **Issue 9(1) & (.2)**, respectively.

The scale of affordable housing need identified in the *Glasgow and the Clyde Valley Housing Need and Demand Assessment* (GCV HNDA), June 2011, translated into Housing Supply Targets (HSTs) and expressed as a land requirement in the LDP, is outlined under **Issue 4** (refer to Background Report: Inverclyde LHS 2011-2016, Part 3, Chapter 8). Suffice to say here, both the limited scale of that requirement in the sub area 'Kilmacolm & Quarrier's Village' and the absence of any recognised mechanism to deliver it in accordance with other policy objectives, i.e. to provide land sufficient for affordable homes alone, necessitates a land supply solely to support that need. The introduction of Policy RES4 'Affordable Housing Provision' is designed to remove this impediment, together with the land supply identified in the LDP. Given the landscape and environmental factors noted above, this relatively marginal scale of need does not justify the scale of greenfield release that would be necessary and advocated by a number of representees, since this would be out of all proportion to the outcome of the GCV HNDA, in relation to both private and affordable housing requirements in this SHMA and the Inverclyde HMA.

Duchal Estate (73)

Kilmacolm has not been 'devoid of development': over the last 10 years to 2012/13, an average of 14 dwellings per annum has been completed (and before the downturn in 2008 over a similar period, it was 24 per annum). These house completions represent 8% of the Inverclyde total, while Kilmacolm and Quarrier's Village account for 5% of total population/households, and all but **xx** per cent

have been within the settlement boundaries.

Mactaggart & Mickel Homes Ltd (55)

Duchal Estate (73)

The level of housing development required to encourage the necessary investment in the public transport infrastructure would be of such a scale that it would undermine the landscape setting of Kilmacolm, with releases for development required on some if not all of the green wedges. This is completely unacceptable and unnecessary, given there is no strategic requirement for this scale of housing development at this time.

The foundation of the settlement strategy in this locality requires what has been presented in this LDP: a tightly drawn Green Belt boundary that was found to have merit and purpose at the 2004 LPI (refer to Volume 2: Housing, page 98, para 7.158). Insofar as the overall housing land requirement has not changed significantly since, there is no case for amending the Green Belt in such a radical way when there is no need to find 'room for expansion', at least under the current *Glasgow and the Clyde Valley Housing Need and Demand Assessment (GCV HNDA)*, June 2011, until 2025. Given there is no such requirement it would be inappropriate and without precedent to release such a scale of land in such a location for what is, effectively, an unrealistic view of future housing demand.

No modifications recommended.

Reporter's conclusions:

Reporter's recommendations:

Issue 3	Transport	
Development plan reference:	Chapter 5 pages 33-35 Trunk Road – Policy MAC1-7, Policy TRA1 & Policy TRA4 Sustainable Access - Policy TRA2 Car Parking - Policy TRA3 Proposals Map B	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Ms Alison Clark (7) Councillor David Wilson (28) Cardwell Bay & Greenock West Community Council (37) Kilmacolm Civic Trust (63) SportScotland (68) Kilmacolm Community Council (71) Stuart McMillan MSP (75)</p>		
Provision of the development plan to which the issue relates:	Transport and Connectivity	
Planning authority's summary of the representation(s):		
<p>Sustainable Access</p> <p><u>Ms Alison Clark (7)</u> Object to the Proposed and Potential Sustainable Access road, which runs through Ardgowan Road, Wemyss Bay and along Brueacre Road into the development site at Inverkip Power Station. There is a primary school on Ardgowan Road and fear for the safety of the children attending this school if it is used as an access for the development.</p> <p><u>Stuart McMillan MSP (75)</u> Concerned with the limited number of access points to the river from within Inverclyde. There is significant development potential of using the river for tourism that would be enhanced by better access points. It would be worth stressing the opportunities for such developments within the Local Development Plan to encourage their establishment.</p> <p>Car Parking</p> <p><u>Kilmacolm Civic Trust (63)</u> The civic trust identified the need for more long-term car parking in Kilmacolm in 2010 to help maintain the economic viability of the centre of the village in line with SD3 Place Making of Sustainable Communities and Environmental Heritage. The Council should therefore commit to finding and funding such a site under Policy TRA3.</p>		

Kilmacolm Community Council (71)

Policy TRA3 states the Council will 'safeguard the land necessary for ... the Council's Parking Strategy' but there is no suggestion of such safeguarding in Kilmacolm. Current parking opportunities are already under pressure and this is likely to become worse and have an adverse effect on the viability of the Village centre. Extra pressure will be due to: any development at Balrossie being heavily car dependent for access to the Village; residential development in the replacement Institute Building will increase demand for residential parking at the centre; and more regular enforcement of the existing regulations. The application for development by St Columba's would have helped resolve the problem but was rejected.

Cardwell Bay & Greenock West Community Council (37)

Object to residential development opportunity site r46 'Cove Road (Tarbet Street)'. Site should be designated for car parking, particularly in light of the proposals for a marina, which would cause serious parking issues.

Councillor David Wilson (28)

Long term parking in Kilmacolm will come under pressure due to:

- The 2 hour limit in the Lochwinnoch Road car park
- Potential new residential development in the old Institute building in centre
- Change of use of flats to offices in centre
- Potential new residential development at Balrossie

The 2 hour limit is necessary to maintain turnover and encourage the vitality and viability of the centre. Car parking could be provided behind the old police station as part of the community benefit of releasing the site.

Traffic implications of residential sites

Cardwell Bay & Greenock West Community Council (37)

Note that little account is taken of the traffic situation where housing sites are allocated, for example there is no indication of infrastructure improvements to support the development at Levan Farm.

Modifications sought by those submitting representations:

Sustainable Access

Ms Alison Clark (7)

Remove access road to Inverkip Power Station from Ardgowan Road/Brueacre Road.

Stuart McMillan MSP (75)

Stress opportunities for access points to the Clyde for small crafts within the Local Development Plan. Infer from this wants access points identified through the plan.

Car Parking

Kilmacolm Civic Trust (63)

Include an additional parking action in Policy TRA3 to finding and funding a site for long term parking in Kilmacolm.

Kilmacolm Community Council (71)

The plan should identify and safeguard a site for a long term car parking in Kilmacolm.

Cardwell Bay & Greenock West Community Council (37)

Residential development opportunity site r46 Cove Road (Tarbet St) deleted and the site designated for car parking.

Councillor David Wilson (28)

Release site behind the old police station under an 'enabling' policy, to provide a car park as the associated community benefit (see Issue x).

Traffic implications of residential sites

Cardwell Bay & Greenock West Community Council (37)

None

Summary of responses (including reasons) by planning authority:

Sustainable Access

Ms Alison Clark (7)

The proposed access to Inverkip Power Station from Ardgowan Road/Brueacre Road is for pedestrians/cyclists only and so will have no safety implications for the pupils of the Primary School on Ardgowan Road. Do not propose to make any changes to the Plan.

Stuart McMillan MSP (75)

Understand desire to have access points promoted through the plan, but do not propose to make changes to identify specific points through Policy TRA2, an associated Schedule or on the Proposals Map. Rather recommend changes to the introductory text in paragraph 5.9 to include reference to water based pursuits and the promotion of suitable access points.

Car Parking

Kilmacolm Civic Trust (63), Kilmacolm Community Council (71) & Cardwell Bay, Greenock West Community Council (37) & Councillor David Wilson (28)

The Council is updating its parking strategy as indicated in the Local Transport Strategy (2009) (SDxx). Any requirement for new car parks identified from this will be taken forward through revisions to the Action Programme that accompanies the Local Development Plan. Do not propose to change the Plan at this stage to identify any parking sites in Kilmacolm or at Cove Road.

It is not proposed to release the site behind the old police house for housing,

therefore a car park will not be provided at this location.

Traffic implications of residential sites

Cardwell Bay & Greenock West Community Council (37)

All the sites included in the Proposed Plan were considered by the Council's Roads Service who indicated they were satisfied with the sites in principle. Any further requirements will be considered once an application has been submitted with details of the number of dwellings and parking provision etc. It is not proposed to change the Plan.

Reporter's conclusions:

Reporter's recommendations:

Issue 4	Housing Development Strategy	
Development plan reference:	Chapter 2, Policies SDS5, SDS7 & SDS8; and Chapter 6, Policies RES2 & RES7; Policy MAC1-7	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Scottish Water (1) Sanmina SCI (10) Cllr David Wilson (28) Ms Helen Spragg (33) Persimmon Homes (20) Mr & Mrs Crighton (45) Mactaggart & Mickel Homes Ltd (55) Kilmacolm Civic Trust (63) Duchal Estate (73)</p>		
Provision of the development plan to which the issue relates:	Preference for brownfield development and sustainable locations for regeneration and renewal	
Planning authority's summary of the representation(s):		
<p><u>Scottish Water</u> (1)</p> <p>Para 6.23: there are clear benefits to be realised from utilising existing gap and brownfield sites, the most obvious being quicker access to existing infrastructure provision; however, we appreciate that this is not always appropriate or practical and to emphasise that Scottish Water strongly support the maximum utilisation of existing infrastructure capacity; however, Scottish Water is also fully committed to providing strategic capacity to meet the needs of domestic growth within Scotland, with a Ministerially approved mechanism for triggering such investment being in place.</p> <p><u>Sanmina SCI</u> (10)</p> <p>Policy SDS5 & Policy SDS7: Sanmina SCI welcomes the promotion of the regeneration and re-use of brownfield land within the urban area. Our client agrees that this promotes a sustainable pattern of development for the area. Also welcomes the fact that appropriate new investment and development will be directed towards the Major Areas of Change.</p> <p>Urban containment is the most appropriate way for the Council to approach their spatial strategy when there are so many sites such as the Spango Valley site which can be brought forward to meet the requirements of issues such as housing land supply.</p> <p>Welcome the identification of Spango Valley when referring to the use of</p>		

brownfield land for housing renewal and urban consolidation. The use of this previously developed land to enhance the amenity of the local area with new development, including the much needed housing development that is required for the area.

Persimmon Homes (20)

Policy RES7 (and in association, Policy ENV2): Whilst understanding the principles of greenbelt and its importance to controlling settlement growth and spatial planning, the greenbelt can also be utilised for development if excessive pressure is being placed on settlements for growth.

Cllr David Wilson (28)

Contamination is such on brownfield sites that in the main they are uneconomic to develop. Recent initiated Inverclyde Council reports on Riverside Inverclyde have 'holed the Waterfront initiative below the line'.

Policy MAC1-7: agree to the inclusion in the Plan of all MAC locations.

Ms Helen Spragg (33)

There are so many brown sites throughout Inverclyde now that so many houses have been pulled down that there is no need to spoil a beautiful green area (*unspecified*). No new homes are needed, Inverclyde has a falling population.

Mr & Mrs Crighton (45)

Policy RES7 (and in association, Policy ENV2): the Proposed Plan states in paragraph 6.19 that it aims to provide a good range, choice and distribution of housing sites, mostly in sustainable brownfield locations and is also supportive of small groups of houses in the Green Belt. The most relevant policy for the representation is RES7, which seems to support small groups of dwellings in the Green Belt but this is not clear due to the way the policy is written. It would be helpful if the word or after "...dwellings not adjoining the urban area" were made bold in order to distinguish between small groups of dwellings and the redevelopment of large redundant buildings. To make the policy more clear recommend this addition:

"Small groups of dwellings on brownfield land in the Green Belt will be acceptable provided that –

- (a) The proposal does not detract from the openness of the Green Belt
- (b) The proposal serves the purposes of the Green Belt by bringing a net benefit by, for example, clearing up dereliction and/or improving the appearance of a site."

This will not lead to large amounts of development in the Green Belt as there is a limited amount of brownfield land within it. This is a development of H4 and H17 in the current adopted Plan, which likewise permit small groups of dwellings in the

Green Belt under certain circumstances, including the redevelopment of large redundant institutions, including derelict sites. There are few such institutions in the Green Belt, so it must be that this policy envisaged such institutions to include former waterworks.

Likewise, **Policy ENV2** refers to development in the Green Belt. The representation site would be compatible with this policy and RES7 as we have proposed to clarify it. Further to the above policies, there will be consequential changes to other policies e.g. RES2, where part of the opening paragraph would require to be removed to make clear that it applies to all brownfield land. The end of this policy should cross-refer to policies RES7 and ENV2 to make clear that brownfield development is supported subject to the criteria in these policies. A similar amendment is required for **Policy SDS5** (refer to **Issue 2**).

Mactaggart & Mickel Homes Ltd (55)

Para 6.18: Support for brownfield development in principle is acceptable but, to the complete exclusion of greenfield opportunities is wholly unacceptable given the Scottish Government requirement, through Scottish Planning Policy, to provide a full range and choice of housing sites and tenures and to meet housing requirements in full.

Kilmacolm Civic Trust (63)

Paragraphs 6.14, 6.17 & 6.48, Schedule 6.1 and Proposals Map, under the title 'Housing Needs': KCT is pleased to see from the Proposals Map that the great majority of the proposals by housing developers for release of land in the Green Belt surrounding Kilmacolm and within Quarriers village has been disallowed. The Civic Trust has fought very hard over many years, including those leading up to the adoption of the current and still extant Inverclyde LDP (*sic*), against attempts by developers to have the boundaries of the two villages enlarged. We have also fought very hard to ensure that the two Green Belt lungs that extend into the heart of Kilmacolm from the north and the south are preserved. We shall continue to fight any attempts by developers to have their Main Issues Report and Post-Main Issues Report aspirations reinstated.

Policy RES7: KCT welcomes the continued support of the policy of presumption **against** residential development beyond the settlement boundaries (Green Belt in the case of Kilmacolm). That said, achieving a development that is in keeping with the rural environment, is appropriate. Policy RES7 is brought into sharp focus in the case of the various developments that have taken place over the last few years on the site of North Dennistoun Farm, Kilmacolm, where the footprint of the new buildings bears no resemblance to that of the buildings which comprised the original farm. The case of the former ARP station on Lochwinnoch Road is also mentioned as an example (planning permission having been granted in December 2010 for the site, LDP ref. 'r62), where the policy of replication through replacement is too restrictive, and gives rise to a total lack of flexibility.

In light of the above KCT feel that there should be more scope for a more general interpretation along the lines of Policy HER1, and in light of this, KCT suggest a change of wording in Policy RES7, criterion (a). It is considered that the

suggested change would allow the design of something traditionally rural in feel and more in character with the countryside setting (refer to detailed comments in the KCT submission in relation to the housing proposal granted planning permission on LDP site ref. 'r62' noted above).

Duchal Estate (73)

Referring to the Council's conclusion that there is no requirement for strategic release of greenfield land for housing on the edge of settlement boundaries to accommodate the assessed land requirement, it is stated that this observation is contrary to Scottish Government guidance in para 47 under the Housing Land Audits, which concentrates on effective development land, clearly suggesting that large brownfield sites that are contaminated or have prohibitive upfront development costs, should be supported by the release of greenfield sites where there is demand for housing, which are effective and which can be constructed within a short time period.

In order to comply with the SPP and to take account of the economic climate and opportunities to encourage investment and development, introduction of new greenfield sites for housing across Inverclyde has the potential to bring additional people into the area, help sustain and potentially increase the population within Inverclyde in compliance with the key objectives of the GCV SDP. It is the case that certain greenfield sites which are suitable locations (inner greenbelt) can supply effective development sites and be policy compliant.

Modifications sought by those submitting representations:

Persimmon Homes (20)

Policy RES7: point (f) should be replaced with: "(f) is justified as a sustainable location for development and is a logical extension to an existing settlement where there is an identified need for development or a shortfall in the 5 year effective land supply."

Policy ENV2: point (j) should be replaced with: "(j) is justified as a sustainable location for development and is a logical extension to an existing settlement where there is an identified need for development or a shortfall in the 5 year effective land supply."

Mr & Mrs Crighton (45)

Valley View Farm site to be taken out of the Green Belt and identified as a residential development opportunity, or

propose changes to **Policy RES7** to read:

"Small groups of dwellings on brownfield land in the Green Belt will be acceptable provided that –

- (a) The proposal does not detract from the openness of the Green Belt
- (b) The proposal serves the purposes of the Green Belt by bringing a net

benefit by, for example, clearing up dereliction and/or improving the appearance of a site.

Development of new dwellings within the Countryside will be supported if the proposal is for the redevelopment of large habitable redundant buildings...” and

Changes to **Policy RES2** to read:

“Development on brownfield sites for housing and community use, will be supported where it accords with Policy RES1 and RES5, except where:

- (a) an alternative use of greater priority or significant social and/or economic/employment benefit is identified; or
- (b) an alternative use is identified through an agreed area renewal initiative (refer Policy SDS7); or
- (c) it would result in an unacceptable loss of designated and locally valued open space (refer Policy ENV4)

Proposals should also accord with Policies RES7 and ENV2...” and

Amend **Policy SDS5**, to be consistent with the above, which is narrowly concerned with brownfield land within urban settlements.

Kilmacolm Civic Trust (63)

Policy RES7: point (a) delete ‘character of the existing one to be replaced’, to read: “..... where the proposed building is sympathetic to the character, pattern of development and appearance of the area.”

Summary of responses (including reasons) by planning authority:

Persimmon Homes (20)

Ms Helen Spragg (33)

Mactaggart & Mickel Homes Ltd (55)

The housing requirements presented in the approved *Glasgow and the Clyde Valley Strategic Development Plan* (May 2012), are based on the *Glasgow and the Clyde Valley Housing Need and Demand Assessment* (June 2011). Following the Examination on the SDP, modifications were introduced, primarily in this respect with the introduction of the caveat ‘Preliminary and Indicative’ against the relevant Schedules (8, 9 & 11a), and a new paragraph 4.86a inserted, to provide advice to the eight constituent local authorities in the determination of their respective Housing Supply Targets (HSTs). Following other relevant guidance, Local Housing Strategy (2008), SPP (2010) and PAN 2/2010, these HSTs were in turn set against the most recent annual housing land supply audit and a final Housing Land Requirement (split by tenure - Private and Affordable sectors), was presented in the LDP: Proposed Plan. Reference should be made to Table 6.1 for a summary, with more details provided in Affordable Housing Provision Supplementary Guidance, Inverclyde Local Housing Strategy 2011-2016, Part 3, Chapter 8 and Background Report ‘Updated 2012 Housing Land Supply Audit’.

Persimmon Homes (20)

Mactaggart & Mickel Homes Ltd (55)

Duchal Estate (73)

The housing land supply, summarised in Tables 6.1 and 6.2 of the LDP, demonstrates clearly that there is a generous land supply (the Established Land Supply), with land allocated more than adequate to meet the assessed HSTs and well above-trend historic build rates in Inverclyde. The assessed Effective Land Supply is also more than sufficient to meet anticipated build rates over the 7-year Plan Period, 2012/13 to 2019/20 (Note: liaison with Homes for Scotland (HfS) on the draft 2012 HLS Audit occurred over October/November 2012, but HfS was unable to conclude on the number of disputed sites and the exercise was finally 'agreed by default' in March 2013. Through this audit a considerable number of sites were reviewed and removed from the land supply, while it is only the new additional sites introduced post March 2012 into the LDP that have not been audited.)

There is no question therefore that this land supply audit was carried out fully in accordance with SPP guidance and PAN 2/2010 requirements, and in the Council's view, there is a wide range, choice, distribution and location of sites across the Inverclyde HMA, and in consultation with Renfrewshire Council, a similar adequacy for the Renfrewshire SHMA. Moreover, it is maintained that given the scale of housing development opportunities allocated in the LDP, there will be no land supply constraint when the economy and the housing market improves, to the Council and its Partners' objective of arresting and reversing population decline from Inverclyde.

Persimmon Homes (20)

Agree with representation made and the course of action the Council should take if there were 'excessive pressures' but there is not (i.e. outcome of the GCV HNDA and the conclusion that there is a more than sufficient land supply to meet the assessed HSTs). What is critical to the position in Inverclyde in the anticipated continuing difficult economic and housing market conditions, is the qualifier (after PAN 2/2010), that there is a 'sufficient land supply which is effective, or likely to be capable of becoming effective', (refer to paragraph 6.26 of the LDP), and which also accords with our agreed position with Homes for Scotland over the last few year's HLS Audits, that while the challenging market conditions prevail, it is sensible to take a 10 year view of the land supply.

Mactaggart & Mickel Homes Ltd (55)

It is incorrect to say that the land supply is all brownfield to the complete exclusion of green field opportunities, with a good distribution of large sites available to cater for a wide range of house types and market sectors across the Inverclyde HMA, at Levan Farm and Cloch Road, west Gourock, Strone Farm in Greenock, and Park Farm on the eastern edge of Port Glasgow.

As indicated above in relation to the relationship between the HNDA housing requirement outcomes, the derived HSTs and the HLS (refer to the summary of this position in Table 6.1 of the LDP), it is neither appropriate nor necessary to

meet the SDP 'preliminary and indicative' housing requirements in full, as these are not the relevant figures against which to judge whether the LDP has an adequate effective, and established land supply, to meet anticipated and programmed completions, over the Plan Period, and beyond (refer to summary in Table 6.2 of the LDP).

The anticipated longevity of the current economic situation, agreed with Homes for Scotland (HfS), has been taken into account in the programming of the land supply, and in assessing that supply beyond the 7-year time horizon to 10. On this basis, it is concluded that there is more than sufficient sites that are currently effective, or capable of becoming effective (to quote PAN 2/2010) from the Established Land Supply, to meet anticipated demand and need in full. As the most recent response from HfS on the draft Inverclyde Housing Land Audit 2013 states, "There has been no fundamental change in market conditions in the last 12 months (The) broader economy remains sluggish, with very slow growth in Scotland other than the North-East (and) In that context, the programming in Housing Land Audits should continue to be conservative." (Source: *Inverclyde Draft HLA 2013, (Homes for Scotland), September 2013*).

In relation to the objections submitted above, no modifications are recommended.

Cllr David Wilson (28)

Duchal Estate (73)

There is no evidence to substantiate the claim that, in the main most large brownfield sites are contaminated or have prohibitive upfront costs and are uneconomic to develop. The 2012 HLS Audit, after liaison with Homes for Scotland, includes many such sites over many years have been agreed as being effective. The major turnaround in the redevelopment of the Inverclyde Waterfront over the years 2004-08, and in many large sites within Greenock and Port Glasgow where the Area Renewal Strategy has been implemented for over 10 years, has been on what initially were considered to be 'difficult and uneconomic' brownfield sites.

The response to the continuing downturn in the economy and housing market is not to release what would be in the main less sustainable sites in the Green Belt, since such sites are just as likely to remain undeveloped while the main constraint is not land, but development finance on the supply side and mortgage finance on the demand side.

Mr & Mrs Crighton (45)

Recommend no modifications be made under these representations.

Kilmacolm Civic Trust (63)

Regarding the recommended change to the wording of Policy RES7, while it is agreed that this change has merit, it would not adequately change the meaning and intention of the policy sufficiently to justify the change, so with that in mind, for the policy in our view remains effective as proposed. However, if the Reporter

was minded to recommend a change to the policy to that suggested by Kilmacolm Civic Trust, the Council would not be adverse to comply with such a recommendation.

Reporter's conclusions:

Reporter's recommendations:

Issue 5	Housing Land Supply and Residential Development Opportunities	
Development plan reference:	Chapter 6, Policy RES3, paras 6.14-6.29; and Schedule 6.1	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Samina SCI (10) Persimmon Homes (20) Mr David Eagle (24) Cllr David Wilson (28) Mactaggart & Mickel Homes Ltd (55) Duchal Estate (73)</p>		
Provision of the development plan to which the issue relates:	Housing Land Supply: its effectiveness, generosity and All-tenure Housing Supply Targets	
Planning authority's summary of the representation(s):		
<p><u>Samina SCI (10)</u></p> <p>Policy RES3: welcomes the proposal in the policy for an annual housing land audit to monitor, review, and where necessary augment the housing land supply.</p> <p><u>Persimmon Homes (20)</u></p> <p>Policy RES3: reference is made first to the <i>Glasgow and the Clyde Valley Strategic Development Plan (GCV SDP)</i>, approved by Scottish Ministers in May 2012, after the publication of the Inverclyde LDP Main Issues Report a year earlier. While the <i>GCV SDP</i> Reporter noted that the land requirement within the SDPA area to 2025 was reasonable, in terms of the housing land supply to meet that requirement, the modification to the SDP (paragraph 4.86a, page 50) is relevant and quoted in full: "Such variations could be demonstrated from further analysis to meet some of the identified needs or demands."</p> <p>Turning to the situation in Inverclyde, it is stated that there is a total land requirement of 5,400 homes (private and affordable housing) to 2025, identified in the SDP which equates to an annual housing land requirement of 337 homes. However, it is stated the Council has not demonstrated any analysis in relation to their reasoning for deviating from the targets set within the SDP, as required in accordance with the approved SDP (referring to para 4.86a).</p> <p>Referring to <i>Affordable Housing Provision Supplementary Guidance</i>, page 19, Table 2 (refer also Issue 6), the Council has confirmed that the existing supply, inclusive of the new LDP sites, will be capable of delivering 240 all tenure units per annum (1,670), for the period 2012-2019. In comparison, the SDP requirement of 337 units per annum is stated (2,359 units), which it is claimed would result in a shortfall of 97 units per annum (689 units), between 2012-2019.</p>		

Evidence is presented from the *Supplementary Guidance* document on completions over the past 3 years to suggest the Council have not sought to allocate sufficient units to sustain the level of housing completions achieved over this 3 year period and therefore not 'planning for growth'. SPP is referred to in relation to the planning system identifying a "generous supply of land for the provision of a range of housing in the right places." It is concluded that by planning for 240 units per annum, the Council are effectively planning for a reduction in the rate of house building within their area.

It is claimed that Inverclyde has not got, as stated in the LDP, 'a sufficient land supply which is effective, or likely to be capable of becoming effective, to meet the assessed Housing Supply Targets (HSTs) to 2020, and a more than generous supply to meet the estimated all-tenure housing requirement over the longer term planning horizon, to 2025.' Nor has the Council illustrated the provision of a generosity allowance, as required in SPP.

It is also claimed that having stated that 'sites in the audit are predominantly brownfield in accordance with SPP' that this not in accordance with SPP, which "advocates the release of a range and choice of housing sites in sustainable locations."

Policy RES3: contrary to the policy, the Council will not maintain a five year supply of housing land based on the existing land supply and the new LDP releases. It is stated "to suggest that (the Council) will seek to 'maintain' the five years supply is somewhat contradictory to the level of housing which has been released" concluding, should the Plan be adopted in its current form there will not be a five year supply of housing land.

It is also noted that a Draft Housing Land Supply Audit has been used as part of the review of the existing land supply, and having not been reviewed by Homes for Scotland, means there is unconfirmed market data and potentially an inaccurate HLS Audit.

Mr David Eagle (24)

Private Housing: given the LDP states there is 'no need for large scale strategic release to meet Inverclyde's housing requirements', and (i) there are vast areas of non-greenbelt land that could be used for housing; (ii) Renfrewshire is projecting a declining population; and (iii) with 2,500 planned for the former Royal Ordnance Factory at Bishopton (just five miles from Kilmacolm), there is no pressure for green belt release coming from Renfrewshire HMA. Any need in Kilmacolm would hence be of a strictly local nature.

The LDP projects a need for 65 new private homes in Kilmacolm. This requirement is highly questionable given that (i) there is ample provision for new, typically lower priced private housing elsewhere in Inverclyde and Renfrewshire; (ii) the village's overall population is static and (iii) the LDP plan for 'affordable housing' is based on a premise that many people currently in private housing in Kilmacolm will move to new, smaller properties in the village, thus freeing up a ready supply of larger private homes.

It is contended that Kilmacolm has a very low population density (30-50% lower than Gourrock, Houston, Lochwinnoch or Kilbarchan) and there remains ample opportunity for development in large gardens in the village (i.e. within the existing settlement boundaries) without affecting its character by destroying the surrounding greenbelt. Relaxing the council's rules on infill development (e.g. regarding access) would help facilitate the building of between 50-65 new private homes without developing in the green belt.

Cllr David Wilson (28)

Policy RES3, Schedule 6.1(b): agrees to the inclusion of all the sites identified in Schedule 6.1(b), with the exception of Smithy Brae (site ref. no. 60).

Mactaggart & Mickel Homes Ltd (55)

Chapter 6, paragraph 2.50 (Kilmacolm & Quarrier's Village): referring to affordable housing need, it is claimed this is localised by nature and Kilmacolm is highlighted as a problem area for such housing and affordability in general. Well designed and laid out housing and associated uses could overcome landscape setting issues identified in the paragraph. However, without further housing growth – whether it be private or affordable – there will continue to be a lack of demand for public transport infrastructure and services and vice versa. It is wrong for the Proposed Plan to state that Kilmacolm has insufficient infrastructure to deal with further allocations. If this is a reference to public transport only, as stated above, new development will help to resolve that issue. Infrastructure covers a much wider range of matters and there are no other restrictions highlighted in Kilmacolm that would prevent new housing development. Refer also to **Issue 6**.

Chapter 6, Table 6.1: it is stated that the LDP as expressed in Table 6.1 does not meet the requirement to maintain a five year land supply at all times. Whilst the overall supply may, in theory, balance out at the end of the 15 year period under consideration there is a clear shortfall in provision of new affordable housing in the first and second LDP period (2011-16 and 2016-20) – in excess of 1,000 units depending on output and land supply.

There is a clear failure to provide sufficient housing overall to meet need in these two periods. It is stated there are no significant environmental constraints in the area that would prevent the housing land requirement being met in full. For clarification, it is stated "Green Belt is a policy and not an environmental designation."

It is claimed the land supply is 'back to front' in that the LDP would appear to be relying on large scale land release coming later in the LDP period to compensate for early supply failures. This does not comply with SPP requirements to maintain a five year supply at all times. The LDP is failing to deliver the scale of housing required by tenure, numbers and locations from day one and that this is unacceptable in a plan-led system where the LDP in this case provides the vehicle to address housing land supply problems. Further land must be identified on deliverable sites in marketable locations such as Kilmacolm to provide for local

housing need.

Chapter 6, Schedule 6.1: it does not appear that the Council has carried out a full assessment of every residential allocation made in the LDP against the requirements set out in paragraph 55 of PAN 2/2010.

Chapter 6, Table 6.2: it is claimed in relation to the Renfrewshire SHMA that an effective land supply of only 42% of the total established supply, and only 20% of the affordable housing supply of 50 units, and 57% of a private supply of only 70, is wholly unacceptable in a plan-led system. In such a system land identified for residential development must be effective and deliverable.

This is wholly unacceptable in the context of Kilmacolm where the LDP acknowledges a housing supply and affordability issue.

The LDP requires to de-allocate land that has little or no prospect of development and allocate land that is deliverable to make up the shortfall arising. This will result in a balancing out of the figures and percentages in Table 6.2 of the LDP.

Release of the Old Hall site for approx 70-80 units, and associated uses would contribute, in part, to meeting the overall housing requirement in a sustainable and accessible location. This site alone would represent up to a 53% increase in affordable housing provision based on the figures for the Renfrewshire SHMA alone, according to Table 6.2.

Chapter 6, Schedule 6.1(b): it is claimed that none of the housing figures add up correctly. Total capacity is 117 units and not 120 as stated. The affordable housing supply adds up to 45 and not 50 as stated. 35 of the 72 private sector sites identified are non-effective, representing 49% non-effective. It is also claimed that the seven year timescale, 2012/13 to 2019/20 does not comply with SPP and PAN requirements to maintain a five year housing land supply at all times in the HMA or LDP area. It is contended that all sites in the schedule be reviewed and assessed properly against the criteria set out in paragraph 55 of PAN 2/2010. Sites that have little prospect of coming forward must be deleted and land such as that at Old Hall, Kilmacolm be brought forward as a replacement to ensure a marketable and deliverable five year housing land supply is maintained for the local area.

Chapter 6, para 6.30: states that residential development opportunities are identified for some 120 dwelling units, of which around 40% are suitable to address the affordable need identified in the LHS. The correct figure identified is 117 and not 120 units, furthermore, of the 120 units, 49% are non-effective.

Chapter 6, para 6.31: it is considered unacceptable that the Council expect affordable housing needs in Kilmacolm to be met through 'windfall' development, rather the Council should be properly planning for the needs of Kilmacolm through the LDP.

Duchal Estate (73)

It is stated that there is no (Council) strategic plan to cater for the requirement for

an increasing number of elderly households, certainly not in Kilmacolm. If Inverclyde Council is to move towards a sustainable development strategy, then areas such as Kilmacolm, which have been devoid of investment over many years, require allocated development sites, including affordable housing and retirement properties. This will comply with the overall objectives of the LDP by encouraging growth and investment, stemming population decline and safeguarding and enhancing the local environment.

Modifications sought by those submitting representations:

Persimmon Homes (20)

Policy RES3: in order for the Council to take action and identify additional allocations capable of meeting the housing need requirement in full and that contribute to maintaining a 5 year supply at all times, Policy RES3 should have an additional sentence: "Where a shortfall in the effective five year land supply emerges, actions should be taken to rectify this by approving appropriate planning applications on sustainable unallocated sites."

Revisit the Housing Land Supply Audit and determine the effectiveness of sites with Homes for Scotland (HfS).

Mr David Eagle (24)

No releases in the Green Belt for housing development (private or affordable), but relax planning controls for infill and backland development (within large garden grounds) to meet any forecast housing demand.

Cllr David Wilson (28)

Removal of Smithy Brae site (r60) – refer **Issue 8**.

Mactaggart & Mickel Homes Ltd (55)

Revisit the Housing Land Supply Audit and determine the effectiveness of sites with Homes for Scotland (HfS).

Addition of Old Hall site for housing development, with a capacity for between 70 and 80 homes, with unspecified Affordable Housing Contribution.

Duchal Estate (73)

Include a 'Strategic Plan' (sic) for Elderly Housing Requirements in the LDP.

Summary of responses (including reasons) by planning authority:

Persimmon Homes (20)

The criticism of the Council concerning its ability to take action through Policy RES3, which states "Where a shortfall in the effective five year land supply emerges, actions should be taken to rectify this by approving appropriate planning

applications on sustainable unallocated sites”, is considered to be misplaced. Policy RES3 is quite clear in its intentions in this respect, building on the approved *Glasgow and the Clyde Valley Strategic Development Plan*, Strategic Support Measure No. 10 and Scottish Government guidance and advice in SPP 2010 and PAN 2/2010, stating “An annual audit of the housing land supply will monitor and review, and where necessary, augment the Effective Land Supply, to maintain a minimum five year’s supply in accordance with the GCV SDP and SPP guidance.” Therefore, it is considered Policy RES3 deals with this specific objection about what action should be taken by the Council to address an inadequate effective land supply. Moreover, the policy is in place so that when required, there should be no land supply constraint in assisting with the Council and Partners’ objective of arresting and reversing population decline from Inverclyde.

Past completions over the 3 years noted was distorted by the historically high RSL’s re-provisioning programme, which will not be repeated. It is more appropriate to consider a longer time period to ascertain the trend rate of build in this sector, and therefore the overall total.

Persimmon Homes (20)

Mactaggart & Mickel Homes Ltd (55)

With reference to the Draft Updated 2012 HLS Audit, the majority of sites have been audited by HfS (October/November 2012, but not concluded until March 2013); it is only the new LDP sites that are not, but have been now in advance of the Examination and therefore will be before the adoption of the LDP. Almost all of these new LDP sites are not programmed as Effective, but have been added to the Established Supply. If economic and housing market conditions were to improve, these together with other sites will be brought forward and most likely programmed as Effective, pre 2019/20. It is considered more appropriate and relevant to move the position forward in this way, to use the publication of a LDP to bring forward new sites and at the same time reflect better the changes in effectiveness and deliverability under current depressed housing market conditions. This also better aligns the base year of the new LDP with its anticipated adoption date of summer 2014. Therefore, criticism that our Audit is not in accordance with paragraph 55 of PAN 2/2010 is rejected.

The housing land requirement in the LDP is filtered through the derivation of Housing Supply Targets (HSTs) (applying the aforementioned para 4.86a of the approved 2012 *Glasgow and the Clyde Valley Strategic Development Plan (GCV SDP)*, so would not expect it to be the same as the outcome figures (not ‘targets’) presented in the SDP as a ‘preliminary and indicative’ housing requirement.

Regarding evidence for the derivation of the HSTs, it is accepted the source of the calculations should have been made more explicit, but they are available in the Background Report referenced along with the publication of the Proposed Plan – *Inverclyde Local Housing Strategy 2011-2016, Part 3, Chapter 8 ‘Housing Supply Targets’*.

Mr David Eagle (24)

Criticism of the projected need for 65 new private homes is misplaced, since no

projection is presented, rather the figure refers to the estimated capacity of the land supply. The suggestion that more capacity should be found through infill, including within the large gardens of the large houses in Kilmacolm is not an acceptable way in itself to plan for more new private homes. The LDP and its supporting SG on PAANs provides policy guidance on this type of development and while historically, this type of development is acceptable and has made a contribution and will continue to do so, it is by its very nature 'windfall' development and could not provide a reliable source of supply alone.

Mactaggart & Mickel Homes Ltd (55)

Criticism of the 7-year plan period not being in accordance with SPP and PAN 2/2010 5-year timeframe is unfounded; this is the well-practised procedure of discounting the first two years ahead of the expected adoption date of the Local Plan (now LDP), in order to have a genuine five year supply at that stage, and to accord with the timeframe of the relevant Strategic Plan (now 2012 GCV SDP).

Table 6.1 and the relative balance of land supply/provision across the three time periods reflects prevailing housing market conditions and the expectation that these conditions are not likely to improve over the early part of the effective plan period, to 2019/20. Given this generally accepted position, over the last 3-4 years, it has been agreed with Homes for Scotland (HfS), that there is value in having a longer, 10 year horizon of land supply. As the most recent response from HfS on the draft Inverclyde Housing Land Audit 2013 states, "There has been no fundamental change in market conditions in the last 12 months (The) broader economy remains sluggish, with very slow growth in Scotland other than the North-East (and) In that context, the programming in Housing Land Audits should continue to be conservative." (Source: *Inverclyde Draft HLA 2013, (Homes for Scotland), September 2013*).

The main constraint on house building is not land supply, but the economic and financial circumstances affecting both the supply and demand sides of the housing market.

The LDP's Housing Supply Targets (HSTs) as noted above, reflect the reality of the current economic situation and poor housing market conditions, but land is available, with both extant sites and new LDP allocations: it is our view that the former will return as effective once the housing market picks-up, i.e. there is a more than adequate supply of established land to bring forward when the economy and the financial position improves and finance and funding are made available to both developers to build and householders to get a mortgage, to meet both needs and demands.

The low level of house completions has little to do with 'supply failures', rather the prevailing economic downturn and poor housing market conditions are the reason for the so called 'back to front' land supply. The judgements made for the HSTs and the programming of the land supply is a realistic attempt to deal with the current depressed conditions but at the same time, outlining a future pick-up in demand towards the latter part of the 7-year Plan Period. To quote "identifying 'deliverable' sites in 'marketable' locations such as Kilmacolm to provide for local needs" (sic) would be counter-productive and extremely damaging not only to the

settlement, but also do little to assist a return to the significant regeneration and renewal benefits that were underway over the rest of Inverclyde before the economic recession in 2008.

In addition to the above, SPP or PAN2/2010 does not state that it is a requirement to release land on an individual settlement level. Kilmacolm and Quarrier's Village are but one small part of the larger Renfrewshire SHMA, which has an adequate surplus of land to meet forecast housing requirements.

The claim that it is 'wholly unacceptable' that more land within the K&QV part of the Renfrewshire SHMA should be effective is unsupported in policy guidance, and that 'the LDP requires to de-allocate land that has little or no prospect of development and allocate land that is deliverable to make up the shortfall arising', would do little to overcome the much greater constraint facing the house building industry and potential house buyers currently: an absence of development funding and mortgage finance, respectively.

Comments on the figures presented in Schedule 6.1(b), and associated paragraphs that they do not add up ignore the footnote (page 51 of LDP), clearly stating that the figures are rounded-up for ease of reference. It is inappropriate in any case to present dwelling capacities to the last digit, given that many of the sites across the authority have indicative capacities and on some sites, the stated capacity will be subject to some revision. To submit representations on this level of detail suggests a misunderstanding of the planning for housing, especially over the three time frames presented. Having said that, if looking solely at the position in one/two small settlements, as is the case here, it is perhaps understandable that small differences may matter, but that brings us back to the appropriate market scale that housing should be planned for, i.e. HMA/SHMA, not individual settlement level.

It is claimed to be unacceptable that the Council expect affordable housing needs in Kilmacolm to be met through 'windfall' development. This is not the case. The LDP statement simply reflects actual development history in the settlement, where a considerable number of new completions have come through windfall and there is no reason to expect this to change. That is not to suggest the Council expects this to be to the exclusion of allocated sites in a plan-led system. It is perhaps worth noting that the Scottish Government in its draft consultation on SPP (2013), has asked whether 'windfall' should be counted towards achieving a 'generous' land supply, given the experience of this contribution across the country, ranging from 20-30% in different authorities.

Duchal Estate (73)

The most appropriate document for a 'Strategic Plan' to deal specifically with elderly housing requirements is the Inverclyde Local Housing Strategy 2011-2016, which indeed deals with the particular needs of this age group. The LHS 2011-2016, in its assessment of these needs, as outcomes from the GCV HNDA and in the Council's determination of its HSTs, has been taken fully into account in the conclusions reached on the adequacy of the land supply and in the extent to which it provides a full range of choice of sites for different household sizes and types.

Recommend no modifications be made under these representations.

Reporter's conclusions:

Reporter's recommendations:

Issue 6	Affordable Housing	
Development plan reference:	Chapter 6, Policy RES4, paras 6.31-6.40; and Schedule 6.1	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Persimmon Homes (20) Mr David Eagle (24) Clydeport Operations Ltd. (25) Mr John Watson (46) Mactaggart & Mickel Homes Ltd (55)		
Provision of the development plan to which the issue relates:	Affordable Housing Policy and Provision	
Planning authority's summary of the representation(s):		
<p><u>Persimmon Homes (20)</u></p> <p>Policy RES4: advocating an affordable housing contribution of greater than 25% of the total capacity will not serve to attract house builders to Inverclyde and will hinder the economic growth of the area. The revised SPP is proposing a maximum contribution of 25% Affordable Housing and it is proposed that this is implemented within Inverclyde to reflect ongoing market conditions unless sites are allocated solely for the purpose of affordable housing.</p> <p><u>Mr David Eagle (24)</u></p> <p>Affordable Housing: commenting on the LDP's conclusion that the need for affordable housing is low and comes from smaller households, largely in the 60+ age range, it is questioned whether 'affordable housing' is necessary for this cohort: rather those households choosing to 'down-size' will have the means to buy in the local market and not need such housing.</p> <p>Referring to the LDP (Affordable Housing Provision SG), the lower quartile value for housing in Kilmacolm is £102,000. Land Registry data indicates that 38% of Kilmacolm sales in the last year have been at a figure below the Scottish average. Kilmacolm is expensive in Inverclyde terms, but the averages are skewed by a small number of extremely expensive houses – it is claimed affordable homes are already available in reasonable quantities.</p> <p>Questions the need for 45 new 'affordable' homes in Kilmacolm, especially as the LDP confirms there is negligible 'net migration'. Believes the true need is minimal and definitely not large enough or certain enough to warrant "sacrificing our precious greenbelt. Nobody should be left in any doubt that once land has been removed from the greenbelt it will be fully developed, irrespective of whether the council's assumptions on the need for affordable housing turn out to be correct or</p>		

not.”

Assuming there is a need for 45 new affordable homes in Kilmacolm, it is suggested they could be accommodated without impacting on the greenbelt, as follows, by:

- (i) adding the housing use in the Institute redevelopment to the LDP and ensuring that it is all ‘affordable’, providing c. 10 units;
- (ii) ensuring the Balrossie site takes its fair share of affordable housing (10 homes, based on council policy). In the event this is not practical, levy a charge on each house in order to subsidise affordable housing at Smithy Brae (again in line with policy); and
- (iii) using the Gasworks site (Smithy Brae) to accommodate 10-20 affordable homes plus a number of private homes. Given the ‘affordable’ balance in the LDP of 30:12, a smaller scheme could equally have a mix of say, 14:5 and be economically viable. If the ‘levy’ approach is used at Balrossie, this mix could be changed to (say) 20:2, or even 25 affordable homes. (Refer to **Issue 8** for further comments in relation to the development of the Smithy Brae site).

Clydeport Operations Ltd (25)

Policy RES4, Schedule 6.1: objection submitted to the application of this policy as it relates to two MAC policy areas (MAC1 and MAC2), and to residential development opportunity sites within these areas, listed in Schedule 6.1 as: ‘Victoria/East India Harbour’ (r33), and ‘James Watt Dock (East) (r14) and James Watt Dock/Garvel Island (r15).

In relation to **Victoria/East India Harbour**, it is stated that because the site was granted outline planning permission in January 2006, for mixed use including residential, and a detailed permission for 88 residential units was subsequently approved, that under the conditions specified in Policy RES4 (and Supplementary Guidance on ‘Affordable Housing Provision’), that the site is exempt from the policy. The grant of planning permission in both cases was for open market private housing, with no provision to be made for affordable housing. The affordable housing quota of 60 units (25 % of the indicative total of 240), for site r33 in Schedule 6.1 is therefore objected to and should be ‘0’.

Turning to **James Watt Dock (East) and James Watt Dock/Garvel Island**, a similar case is presented, with outline planning permission granted in 2010, which included a Masterplan / Urban Design Framework for a mixed use development comprising housing and a range of other uses. A detailed permission also exists for residential flats to the west of the Sugar Warehouses. In both cases, no reference was made specifically to affordable housing.

Concern is raised over the affordable housing quota introduced through Policy RES4 (and Supplementary Guidance on ‘Affordable Housing Provision’), to the two sites in the LDP that apply to the Policy MAC2 area: sites r14 and r15. With regard to site ‘r14’, this is identified as a housing site providing for 86 affordable homes, representing 100% of the indicative capacity. It is important to note however, that site ‘r14’ was included in the planning consent granted in 2010 and

it is therefore submitted that the 86 affordable units contribute to the overall affordable housing provision required at the James Watt Dock site.

In relation to site 'r15', with an indicative capacity of 500 units, it is submitted that no affordable housing provision should be required. Taking the two sites together, 86 of the total 586 would represent an affordable housing contribution of some 15%. This level is considered to be acceptable given the significant amount of investment put in to remediate the former industrial area and for the regeneration of the area. It is submitted that the higher affordable contribution will render the development unviable and will place serious doubts on its continued regeneration.

Inverclyde currently has an abundance of affordable housing and as such ongoing development and infrastructure works at James Watt Dock 'should not be further burdened' by a requirement to provide affordable housing.

In view of the above, the affordable housing contribution of site 'r15' should be '0' and Schedule 6.1 should be amended to being a private tenure (effective) site with no affordable housing provision.

Mr John Watson (46)

Affordable Housing: the only definition of affordable housing demand in relation to Kilmacolm is in the footnote to Schedule 6.1(b) (in AHP SG), "Households in need are small in size and are aged 35 years+, in particular 60 years+." This does not identify where these people currently live and what tenure of house they occupy, but if they are owner occupiers moving to a smaller house, then affordability is not the main issue but one of supply of particular type of houses.

Referring to the needs of older people, SPP3, HNDA Guidance (2008) and draft SPP (2013) are quoted to maintain 'specialist housing requirements' and other particular needs (e.g. sheltered housing), should not pursued through affordable housing policies, these being an inappropriate and too insensitive an approach. This is shown by the Council failing to apply its own policy on affordable housing in a consistent and coherent way.

Policy RES4: it is claimed that the Council does not apply the policy on its own and other sites, and (i) there is no evidence presented as to what the level of affordable housing demand is, and therefore why more than 25% is required; (ii) the policy is not pursued with any consistency; (iii) the Council does not apply it to its own sites (e.g. former library/institute building); concluding (iv) that meeting the affordable target is not so important and or the Council wants to maximise the sale of its asset without "any pesky affordable housing policy to adhere to. Either way the policy is not being practised by the very Council promoting it."

The Council should include the former library/institute building in its *Updated 2012 HLS Audit,(Background Report, April 2013)*, and apply its affordable housing policy to it, especially as this site is ideally located for 'households small in size and aged 35 years +, in particular 60 years +.'

The Council does not apply its Policy RES4 to Balrossie or the former Quarry sites (site refs r63 & r64) – for more detail, refer to **Issue 7(.1)**.

The conclusion drawn is that the Council is not prepared to support development and promote its Affordable Housing Policy on its own sites, but instead wishes to see more green belt developed to achieve an unquantified need that should in any event be better met by defining it more accurately and meeting it more appropriately.

Green Belt Release for Affordable Housing (and Policy RES4): referring back to the Main Issues Report and the then approved *Glasgow and the Clyde Valley Joint Structure Plan (2006)*, it is stated that there is no evidence given as to why the new Policy RES4 should be more successful than previous attempts, and as to why the release of green belt is no longer solely for affordable housing.

It is claimed the main reason for sites having not been developed would be the economic crash with loss of borrowing capacity for developers and house buyers. Indeed, some of the developers of other sites within Kilmacolm are now in receivership since gaining planning permission. The revival of the housing market should be the prerequisite to test the developability of existing sites before adding extra greenbelt land to make them more commercially attractive.

Mactaggart & Mickel Homes Ltd (55)

Affordable Housing: (in relation to paragraph 2.50 and to Kilmacolm & Quarrier's Village): affordable housing need is localised by nature and Kilmacolm is highlighted as a problem area for such housing and affordability in general. Well designed and laid out housing and associated uses could overcome landscape setting issues identified in the paragraph. However, without further housing growth – whether it be private or affordable – there will continue to be a lack of demand for public transport infrastructure and services and vice versa. It is wrong for the Proposed Plan to state that Kilmacolm has insufficient infrastructure to deal with further allocations. If this is a reference to public transport only, new development will help to resolve that issue. Infrastructure covers a much wider range of matters and there are no other restrictions highlighted in Kilmacolm that would prevent new housing development.

Modifications sought by those submitting representations:

Persimmon Homes (20)

Policy RES4: wording should be changed throughout the document (referring to Supplementary Guidance ' Affordable Housing Provision', page 9, Policy RES4), and in the LDP (in Policy RES4, criterion (a)), to reflect a maximum contribution of 25% Affordable Housing on sites of over 20 units.

Mr David Eagle (24)

Addition of the former library/institute building in the centre of Kilmacolm as a housing development opportunity, in Schedule 6.1, and solely for affordable housing; changes in the affordable housing contributions on other sites, including Balrossie and Smithy Brae; and no release of housing sites in the Green Belt.

Clydeport Operations Ltd. (25)

RES4, Schedule 6.1: the affordable housing contribution, 'the quota' for 'Victoria/East India Harbour' (site ref. 'r33'), and for James Watt Dock/Garvel Island (site ref. 'r15'), should be removed and the Schedule amended to reflect this position.

Mr John Watson (46)

Addition of the former library/institute building in the centre of Kilmacolm as a housing development opportunity, in Schedule 6.1; request that Council applies its affordable housing policy to the Balrossie site (r63) and the former Quarry (r64); and no release of sites in the Green Belt for housing.

Mactaggart & Mickel Homes Ltd (55)

Addition of Old Hall site for housing development, with unspecified Affordable housing contribution (refer to **Issue 9(2)**).

Summary of responses (including reasons) by planning authority:

Persimmon Homes (20)

Criticism of the approach and policy on affordable housing needs is wanting to have it both ways: on the one hand the Council is criticised for not meeting needs in full (our derived HSTs), yet on the other, having promoted a new policy response, it is claimed this will hamper development.

The development of policy for the LDP pre-dates the Scottish Government's Consultation Draft SPP 2013. The existing benchmark level of 25% contribution for affordable housing provision in SPP 2010 is a reasonable one, so stipulation as outlined in the Draft 2013 SPP of 'up to 25%' is neither helpful nor appropriate. Because circumstances do vary greatly over the country, across city regions and indeed within an area the size of Inverclyde, there should be an acceptance of variation around the benchmark level, with local authorities having the scope to negotiate with developers a higher or lower contribution, depending on the prevailing economic circumstances, housing market conditions and levels of identified need. Negotiation on a site-by-site basis should be the accepted approach and there is a good case for having affordable housing policies to allow for this flexibility. It cannot be emphasised enough that the 2013 SPP is still at the draft consultation stage and may not be confirmed in the finalised version.

The approach to addressing the affordable housing needs in Inverclyde is considered to both promotional and pragmatic, in light of ongoing market conditions, with the introduction of the benchmark 25% quota policy **and** the allocation of sites solely for the RSLs to build affordable homes. For the latter, the allocated sites are in the main surplus Council land and approved by the Council to do so.

Mr David Eagle (24)

Criticism of the evaluation of the need for affordable housing in Kilmacolm and the view that 'true need' is minimal and because of this, the adjustments made to the Green Belt are considered unacceptable: the Green Belt adjustments made are minor, comprising only two in Kilmacolm, and while it is accepted that the scale of need is small, uncertain in its make-up and not easily quantified, this representation provides no evidence to support the view that 'true need' is even less or 'minimal'.

Mr David Eagle (24)

Mr John Watson (46)

Comments on 'down-sizing' have been taken out of context and presented as if that were the only reason for promoting sites in Kilmacolm for affordable housing. Only a very small part of the assessed need for affordable homes in Kilmacolm is estimated to arise from owner-occupiers, rather it arises largely from the private rented sector (sources: *Glasgow and Clyde Valley Housing Need and Demand Assessment* (June 2011), and *Inverclyde Local Housing Strategy 2011-2016* (November 2011)). As this is a small part of the housing 'market' in Kilmacolm, this is the reason numbers are small.

The relevance of 'down-sizing' to housing provision is in the way this could free-up larger family houses to enable those that can afford it, to move and stay in Kilmacolm, or attract new residents in. Where these predominantly elderly householders down-size, that need not be within Kilmacolm, as like other households moving, their first choice in relocating to a new home will be within the Renfrewshire SHMA, or indeed further afield, depending on their own particular circumstances. A part of the land supply and therefore expected provision being made in the LDP for Kilmacolm would provide opportunities for such households to remain in Kilmacolm.

Presenting alternative sites and the means to provide for the 'assumed need for affordable housing', it is acknowledged that a different balance of 'Affordable: Private Tenure' could be negotiated on the Smithy Brae site (with Green Belt adjustment or not), and while acknowledging the inclusion of the former Kilmacolm Institute building as a housing development opportunity into the LDP, it is also accepted this could provide for up to 100% affordable dwellings. With regard to the Balrossie site, it is clearly stated in *Affordable Housing Provision Supplementary Guidance*, page 10, para 4.8, that allocated 2005 Local Plan sites with the benefit of planning permission, including those lapsed, do not qualify under the quota policy. A retrospective change to the planning status of a site such as this would be a breach of an owner/developers' rights and expose the Council to likely legal challenge and considerable costs.

Mr John Watson (46)

It is incorrect to state that the only definition of affordable housing is as quoted from the *Affordable Housing Provision Supplementary Guidance*. Affordable housing need is evidenced from those households in need within the private and some extent, social rented sectors, not from those currently occupying houses too large for their own needs. Under-occupancy is not a criterion, despite the wishes

of some (sic).

It is also inaccurate to suggest that there is no overlap between older people and affordability issues and that particular and/or specialist housing requirements should be assessed separately from affordable housing policy in general. In that respect the Council is not failing to apply its own policy in a consistent and coherent way. In referring to sites where it is claimed this is so, e.g. the former Kilmacolm Institute, former Quarry site and Balrossie (as above), there is a misunderstanding of the degree to which the policy can be applied (refer above). At the same time, the Leperstone Avenue site is ignored in this submission, as are the Council's intentions at Smithy Brae and many other Council sites earmarked for 100% affordable homes in the rest of Inverclyde. (Refer to Council Committee Reports)

Criticism of the Green Belt releases to make provision for affordable homes – there is only one, comprising an additional estimated capacity of less than 20 dwellings – it is claimed that there is no evidence to suggest this will be any more successful than the previous policy in the *Glasgow and the Clyde Valley Joint Structure Plan (2006)*, of releasing land in the Green Belt solely for this need: this point is made with particular reference to Smithy Brae, which has been released for a very particular reason.

The criticism made of the Council releases, that the main issue facing undeveloped sites is the economic situation, with loss of borrowing capacity for developers and house buyers, is not disputed. What is disputed is the opportunity presented with a new LDP to look afresh at some sites and in some cases longstanding constraints over their development (e.g. Smithy Brae, refer to **Issue 8**), and present a new set of circumstances under which they can be brought forward beyond the current economic downturn, planning further ahead than the next 5 years.

Mactaggart & Mickel Homes Ltd (55)

Affordable housing need, like any other need, may be local in origin but need not be addressed locally. According to SPP 2010 and PAN02/2010, the relevant geography for provision is the Housing Market Area (HMA) /Sub-housing Market Area (SHMA) level, or over a wider local authority sub-area, where appropriate. This 'market area' is dependant on what type of housing / tenure is being provided. The suggestion that the level of affordable housing required in Kilmacolm would resolve the issue of insufficient demand to make improvements to public transport belies the proposal being put forward. This is little different from the 2004 proposals for this site and where in the 2004 LPI Reporter's words, "the Trojan Horse of mainstream private development" is the main reason for developer interest in Kilmacolm, not meeting the affordable needs of the local population.

Throughout the Old Hall submission there is considerable ambiguity in the proposed housing development, with a lack of clarity over whether and how much 'affordable housing' is part of the mix, this extending to the overall numbers proposed for the site (between 70 to 80 unit capacity). This is all the more noticeable given the criticism of the Council and its lack of exact numbers, and

mention too of 'associated uses', unspecified. (Refer also to **Issue 4 and 9(2)**).

Clydeport Operations Ltd. (25)

It is acknowledged that Policy RES4 and the specification of sites eligible under the policy (outlined in full in the Supplementary Guidance 'Affordable Housing Provision', page 10, paragraphs 4.8 & 4.9) excludes "... sites with the benefit of an extant planning permission for residential development," . However, the Supplementary Guidance goes on to state, " ... although where a permission is revised or renewed resulting in an increase in the number of dwelling units of 20 or more, the policy will apply and relate to the additional number of units on the site."

In light of this Supplementary Guidance, looking at each site in turn, the following is maintained.

(1) Victoria/East India Harbour: both the planning permissions are now lapsed and no progress has been made with the construction of residential units on the site since 2006. Over recent years, discussions have continued between the Council and the owners on the prospects for the site in light of the economic climate for investment in such a site and the likely timing of residential development with an improvement in the housing market. Meanwhile, pre-application discussions around potential changes to the consented masterplan have been underway, with the possibility of amendments being made in the development mix, to reflect the prevailing investment climate.

There is clearly a case to be made in view of this time lag, during which time the Council has acted on more up-to-date evidence on the scale of housing need and demand (source: *Glasgow and the Clyde Valley Housing Need and Demand Assessment* (June 2011) and *Inverclyde Local Housing Strategy 2011-2016*, November 2011), for the site and its contribution to meeting the housing requirements outlined in the LDP to be re-assessed.

(2) James Watt Dock/Garvel Island: the planning permissions in this case are extant due to investment made on access roads and other infrastructure related to the use of the dock as a marina. Therefore, according to Policy RES4 the larger master-planned site 'r15' should not be eligible for the 'quota approach' to the delivery of affordable homes. However, like the Harbours site, the more up-to-date *GCV HNSA* and Council's *LHS* applies. Contrary to the submission made, there is no good reason why a site of this scale and significance in an inner urban waterfront locality should have as little as a 15% affordable housing contribution, and concentrated on one small site, when the overall development framework lends itself to a mixed use / mixed tenure site, in accordance with aims expressed in SPP.

It is also highly likely that the development framework/masterplan for the site will be revised and amended over the coming years, particularly given the scale and complexity of the site and the expectation that it will be developed in a number of phases over a period of some 10-15 years. Depending on the final mix of house types, densities and the market that the site is promoted to, there is considerable potential for the indicative dwelling capacity assigned to the site to be over-

conservative. There is a distinct possibility that revised housing numbers could be as high as 800, possibly even more. If that were to be the case, and mindful that the 500 figure is indicative, the working 'benchmark' of 25% should remain in place, until at least the next stage when detailed applications will come through and when decisions on tenure can be negotiated and confirmed.

Looked at this way, the indicative affordable housing contribution of 125 units is also conservative, and over time such a benchmark should not undermine the economic viability of the development. To the contrary, the marketing of this exciting waterfront development at this location as a genuine mixed use, mixed tenure (including potentially mid-market rented accommodation), should only enhance its chances of success, attracting households into Inverclyde from the wider Greater Glasgow HMA, while at the same time assisting the Council address the housing requirements of Inverclyde. Promoted in this way, the site has potentially a major part to play in assisting the Council and its Partners objective of arresting and reversing the population decline from Inverclyde.

In response to the claim that 'Inverclyde currently has an abundance of affordable housing', there may very well be an above average proportion of low to lower-middle market properties in the owner occupied sector, but the sector as a whole in Inverclyde is above the Glasgow City Region average, with over 65% of all households owner-occupiers. Moreover, the new LDP is concerned with the future and the fact that there is a backlog of housing need now, and forecast to increase over the next 10 years, as evidence by the *GCV HNDA* (June 2011).

It is considered that the application of a 'benchmark 25% affordable contribution' under the above circumstances is reasonable, bearing in mind also that it is clear in the LDP (and expanded upon in the Supplementary Guidance), that the affordable housing contribution will be open to negotiation on a site-by-site basis at the time of the submission of detailed planning applications.

Recommend no modifications be made under these representations.

Reporter's conclusions:

--

Reporter's recommendations:

--

Issue 7(.1)	Housing Sites in Proposed Plan – Kilmacolm and Quarrier’s Village	
Development plan reference:	Chapter 6, Policy RES3, Schedule 6.1	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Mr David Eagle (24) Cllr David Wilson (28) Mr John Watson (46) Mr Julian Barr (47) Mr & Mrs Perry (56) Kilmacolm Civic Trust (63) Kilmacolm Community Council (71) Mr & Mrs Owen (77)</p>		
Provision of the development plan to which the issue relates:	Residential Development Opportunities	
Planning authority’s summary of the representation(s):		
<p>Leperstone Avenue, Kilmacolm (r59) Cllr David Wilson (28), Kilmacolm Civic Trust (63)</p> <ul style="list-style-type: none"> - supports the identification of the site as a residential development opportunity <p>Mr Julian Barr (47), Mr & Mrs Owen (77)</p> <ul style="list-style-type: none"> - comments that the proposed development blocks off farm access to the fields at the back of the garages, as well as a well used pathway for walkers - the proposed development builds over the turning space on Leperstone Avenue, and is only wide enough for parking on one side of the street - questions whether a feasibility study has been done into the impact of increased traffic on this road, because of the state of potholes - young children have a safe place to play - there are well established trees with a rookery to the east of the substation - will strongly object to any building which overlooks or blocks out sunlight to his property - additional demand on water and sewerage systems <p>Former Balrossie School, Kilmacolm (r63) Cllr David Wilson (28)</p> <ul style="list-style-type: none"> - supports the identification of the site as a residential development opportunity <p>Mr & Mrs Perry (56), Kilmacolm Civic Trust (63), Kilmacolm Community Council (71)</p> <ul style="list-style-type: none"> - the infrastructure of Kilmacolm cannot cope with additional housing, with current problems of traffic congestion and parking 		

- unfair to those living in the village and the occupiers of new housing to build at Balrossie
- while KCT has consistently supported the repair and retention of Balrossie House itself, it objects to the manner in which the developer is proposing to achieve this ie through 'enabling' development
- the proposed layout of the housing is suburban, and combined with the scale of the new proposal and car parking, means that the heritage values of the place and its setting will be materially harmed
- the development proposal does not accord with English Heritage Guidance on enabling development, as it fragments the management of those aspects of the place that are crucial to sustaining its significance
- the planning application does not provide details of a financial nature which are required to assess an 'enabling' development of this nature, including costs associated with the repair work
- the site is in the Green Belt and inappropriate for development, as a case for enablement has not been made
- KCC does recognise the desirability for some development at Balrossie, while recognising that the development of this site for housing is hard to square with other policies in the Plan

Former Quarry, Port Glasgow Road, Kilmacolm (r64)

Cllr David Wilson (28)

- supports the identification of the site as a residential development opportunity

Mr David Eagle (24), Mr John Watson (46), Kilmacolm Civic Trust (63)

- questions why the site has been removed from the Green Belt contrary to policies, why has the assumption been made that only a part of the site will be developed and why has the Council changed its historical position on this development
- the reasons for including the house in the Green Belt has not changed, including avoiding ribbon development, clearly defined boundary and the difficulty of road access
- will encourage the owners of the 'Plots' to apply to develop their sites
- the impact of developing three houses outweighs the benefits
- if the access is taken from the Cemetery Road it would be open for the developer to build more than three houses
- the ability to build individual houses can continue within the large gardens of the many large established houses
- the site has been the subject of four previous attempts to develop the site, and each have been refused
- there is no clear, proven need to utilise Green Belt land for private housing development, with plenty of houses in the village on the market, in addition to those with planning permission
- development of this site would change one of the key gateways to Kilmacolm in a detrimental manner
- it would constitute ribbon development and lead to renewed attempts to develop the 'Plots'

Modifications sought by those submitting representations:

Leperstone Avenue, Kilmacolm (r59)

Cllr David Wilson (28), Kilmacolm Civic Trust (63)

- proposes no change to the LDP

Mr Julian Barr (47), Mr & Mrs Owen (77)

- require all concerns to be addressed in the proposed development

Former Balrossie School, Kilmacolm (r63)

Cllr David Wilson (28)

- proposes no change to the LDP

Mr & Mrs Perry (56)

- the Council should give up this plan as unworkable

Kilmacolm Civic Trust (63)

- none specified

Kilmacolm Community Council (71)

- none specified

Former Quarry, Port Glasgow Road, Kilmacolm (r64)

Cllr David Wilson (28)

- proposes no change to the LDP

Mr David Eagle (24)

- produce a revised plan which takes on board opinions and ideas expressed above and adheres to its own and Scottish Government policies

Mr John Watson (46)

- the Council should review the supplementary guidance on back plot development

Kilmacolm Civic Trust (63)

- none specified, but assume that KCT feel the site should be removed from the listed Residential Development Opportunities

Summary of responses (including reasons) by planning authority:**Leperstone Avenue, Kilmacolm (r59)**

Cllr David Wilson (28), Kilmacolm Civic Trust (63)

Mr Julian Barr (47), Mr & Mrs Owen (77)

Background – the site is owned by Inverclyde Council and is surplus to requirements. It was identified in the adopted Inverclyde Local Plan as a Housing Opportunity site (ho77). There is no known developer interest in the site.

- the site is within the village boundary
- the site has no environmental protection designations
- consideration of the planning application will address the existing farm access, the turning head, parking matters, issues of privacy and the existing trees and wildlife
- the development will adhere to building standards in regard to issues of daylighting
- consultation with Scottish Water and SEPA will be undertaken in regard to demand on water and sewerage systems
- objections will be addressed during the consideration of the planning application

Former Balrossie School, Kilmacolm (r63)

Cllr David Wilson (28)

Mr & Mrs Perry (56), Kilmacolm Civic Trust (63), Kilmacolm Community Council (71)

Background – the site was identified in the adopted Inverclyde Local Plan as a Housing Opportunity site (ho78). The planning permission for 40 dwellings on the site (approved September 2007) has now lapsed and a new application, also for 40 dwellings, but on a larger site, has yet to be determined.

- the proposal was considered acceptable in the past as a means of saving the 'B' listed Balrossie House
- infrastructure, traffic and parking matters will be considered at the planning application stage
- consideration of this development has previously been undertaken without the benefit of enabling policies or guidance (example of other similar developments – Auchinbothie, etc)
- the heritage values will be determined at the planning application stage

Former Quarry, Port Glasgow Road, Kilmacolm (r64)

Cllr David Wilson (28)

Mr David Eagle (24), Mr John Watson (46), Kilmacolm Civic Trust (63)

Background – the site was refused planning permission in November 2001, and dismissed on appeal in May 2002. It was again refused planning permission in January 2004, and again in March 2010.

- a Green Belt Review was undertaken for the LDP, and the most appropriate long term, defensible boundary identified
- creates an end stop for development in the village
- reflects the character of the village
- the situation at the 'Plots' site is quite different and any proposed development there would be considered on its merits
- It is acknowledged that the proposed policy for this site has changed from that of the adopted Local Plan. The intention of a Local Plan review is to give consideration to the current circumstances and opinions relating to each site, with the decision being taken not always consistent with previous decisions. In this particular instance the decision taken has been a marginal one, where a reasonable case can be made for both the inclusion of the site within the settlement boundary and its retention in the Green Belt.

In conclusion, the Council does not propose to remove or change the sites at Leperstone Avenue, Kilmacolm (r59), the Former Balrossie School, Kilmacolm (r63) and the Former Quarry, Port Glasgow Road, Kilmacolm (r64) in Schedule 6.1 of the LDP.

Reporter's conclusions:

Reporter's recommendations:

Issue 7(.2)	Housing Sites in Proposed Plan – Port Glasgow	
Development plan reference:	Chapter 6, Policy RES3, Schedule 6.1	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Clydeport Operations Limited (25) Mr James Delaney (39) Ms Mary McCully (54) Mr Simon Hutton (70)		
Provision of the development plan to which the issue relates:	Residential Development Opportunities	
Planning authority's summary of the representation(s):		
<p>Lower Mary Street, Port Glasgow (r10) Mr James Delaney (39), Mr Simon Hutton (70)</p> <ul style="list-style-type: none"> - objects to the Ardgowan Street part of the site for the development of housing as it contains a sewage works and a heavily wooded area, with paths providing easy access for school children to local amenities, access to bus stops and to Port Glasgow town centre, as well as dog walkers. - there are hundreds of houses in the Kingston Dock area and this is the only piece of woodland in the central area. - the site also contains a burn and local wildlife, including owls, bats, squirrels and foxes - the site should benefit from a TPO (reference Schedule on TPOs) <p>Former Broadstone Hospital, Port Glasgow (r11) Ms Mary McCully (54)</p> <ul style="list-style-type: none"> - the site is unsuitable for building, especially at the present time - the area has been a permanent building site for the past twenty years as a result of various developments, redevelopments and renovations - it is a danger to passers by with trees and plants growing on the wall - the road is narrow and has suffered from contractor's traffic - the road was originally intended to be closed off - unsuitable corner with Mackie Avenue for the traffic that uses it - (Reference to TPO Schedule 4) 		
Modifications sought by those submitting representations:		
<p>Lower Mary Street, Port Glasgow (r10) Mr James Delaney (39)</p> <ul style="list-style-type: none"> - reclassification of the site as Green Belt with tree protection orders <p>Mr Simon Hutton (70)</p> <ul style="list-style-type: none"> - the site is unsuitable for any form of development and should benefit from tree preservation orders 		

Former Broadstone Hospital, Port Glasgow (r11)

Ms Mary McCully (54)

- the site is unsuitable for building and the green space aspect should be considered in its future planning

Summary of responses (including reasons) by planning authority:

Lower Mary Street, Port Glasgow (r10)

Mr James Delaney (39), Mr Simon Hutton (70)

Background – the site is the subject of pre-application discussions with an RSL for the construction of social rented houses.

- site is within the urban area and is part of a Major Area of Potential Change (Special Area) in the adopted Plan (2005)
- the site currently has no environmental protection designations
- consideration of the planning application will address the existing sewage works, access to the town centre and other facilities and the significance of the existing trees and wildlife
- objections will be addressed during the consideration of the planning application

Former Broadstone Hospital, Port Glasgow (r11)

Ms Mary McCully (54)

Background – the site is owned by Inverclyde Council and is surplus to requirements. There is currently no known developer interest in this site.

- the site is within the urban area
- the site currently has no environmental protection designations
- when a planning application is received, consideration will be given to matters relating to traffic, access and the suitability of surrounding roads
- objections will be addressed during the consideration of the planning application

In conclusion, the Council does not propose to remove or change the sites at Lower Mary Street (r10) and the Former Broadstone Hospital, Port Glasgow (r11) in Schedule 6.1 of the LDP.

Reporter’s conclusions:

Reporter’s recommendations:

Issue 7(.3)	Housing Sites in the Proposed Plan - Greenock	
Development plan reference:	Chapter 6, Policy RES3, Schedule 6.1	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>NHS Greater Glasgow and Clyde Valley (4) Belville Community Association (6) Cllr Ciano Rebecchi (21) Clydeport Operations Limited (25) Ms Diane Rebecchi (29) Cllr Innes Nelson (36) Cardwell Bay & Greenock West Community Council (37) Greenock Unit Trust (43) Mrs Lilian Newman (51) Braeside Resident and Tenant's (61) Stuart McMillan MSP (75)</p>		
Provision of the development plan to which the issue relates:	Residential Development Opportunities	
Planning authority's summary of the representation(s):		
<p>James Watt Dock/Garvel Island, Greenock (r15) Clydeport Operations Limited (25)</p> <ul style="list-style-type: none"> - supports the continued identification of James Watt Dock as a Major Area of Change, suitable for a mix of uses - objects to the reference the word 'flats' in the permitted land uses (identified in the Supplementary Guidance on Local Development Frameworks), and considers that it should be amended to read 'residential' - objects to the inclusion of Policy RES4 and the associated Supplementary Guidance on the provision of affordable housing as it relates to this site, on the basis that James Watt Dock should be considered against the outline planning consent which was granted in 2010, where sites r14 and r15 were included. Site r14 is identified as a housing site with 86 affordable housing units, which represents 100% of the indicative capacity of the site. No affordable housing provision should be required for site r15, which has a capacity of 500. This would therefore represent an affordable housing provision for the James Watt Dock site (total of 586 residential units) of some 15%. - given that the site in question is a former industrial area and has required a significant amount of investment in remediation and resources committed to the site, there should be no further requirement to provide affordable housing, over and above affordable provision on site r14 <p>Garvald Street, Greenock (r18) Belville Community Association (6), Mrs Lilian Newman (51)</p> <ul style="list-style-type: none"> - concerns about the proposed density and loss of greenspace 		

- it would appear that there is already an agreement for the development of housing on this site
- the 45 proposed houses will be built on the green space of Burnhill Street and in Lauriston Park, and this is not in the local plan
- an opportunity should be taken to have private or mixed development on the site
- the decision has been taken to cram as many affordable houses as possible on the site

Victoria/East India Harbour, Greenock (r33)

Clydeport Operations Limited (25)

- supports the continued identification of this site as a Major Area of Change, suitable for a mix of uses including residential, retail, tourism, heritage and leisure uses (reference to Housing Land Supply Schedule 4)
- objects to the inclusion of Policy RES4 and the associated Supplementary Guidance on the provision of affordable housing as it relates to this site on the basis that the investment in remediation and infrastructure works already completed on the site should be taken into consideration when seeking affordable housing contributions

Union Street, Greenock (r37)

Clydeport Operations Limited (25)

- seeks the identification of this site as a mixed use development site, including residential, commercial and a major element of retail. Given the prevailing economic and market conditions, this will allow for flexibility at this key location, and encourage development to come forward at the earliest opportunity (reference to Town Centre Schedule 4)

Cardwell Bay & Greenock West Community Council (37)

- concerned that the housing planned for the area is too dense

Former Greenock Academy, Greenock (r38)

Cardwell Bay & Greenock West Community Council (37)

- concerned that the housing planned for the area is too dense

Former Holy Cross School, Greenock (r39)

Cardwell Bay & Greenock West Community Council (37)

- the site should not be developed as there are drainage issues on the site which affect properties further down

Former Ravensraig School, Greenock (43)

Cllr Ciano Rebecchi (21)

- site should be used for one bedroom houses or an old people's residential home

Former St Gabriel's School, Greenock (r44)

Cllr Ciano Rebecchi (21), Ms Diane Rebecchi (29)

- part of the site should be used for sheltered housing and part for a play area

Braeside Resident and Tenant's (61)

- concerns over the loss of open and green spaces, as well as play areas and recreational facilities in the Braeside area

- the Council has done nothing to protect or enhance open spaces over the past 10 years, including the loss of football parks, swing parks and grassed areas
- (Reference to Open Space Shedule 4)

Valley Park, Spango Valley, Greenock (r45)

Greenock Unit Trust

- support for the mixed use allocation at Spango valley
- Cllr Ciano Rebecchi (21), Cllr Innes Nelson (36), Mr Stuart McMillan MSP (75)
- the recession is stopping companies from expanding
 - houses on the site would be liable to flooding
 - traffic would increase on the A78, which is already at capacity
 - there are road safety issues regarding access to buses on the opposite side of the road and there is a history of accidents on the road
 - housing on this site would be of a satellite nature, leading to increased journeys by car
 - the industrial area would become less secure with the introduction of housing, and be less attractive to industry
 - being a former lakebed, subsidence issues could lead to insurance difficulties for new housing
 - residential properties in close proximity to industrial development could suffer from noise and other industrial activity
 - the industrial areas and the farms in the area could become victims of nuisance and vandalism from the housing areas

Modifications sought by those submitting representations:

James Watt Dock/Garvel Island, Greenock (r15)

Clydeport Operations Limited (25)

- schedule 6.1 should be altered to state that the number of affordable housing units applicable to site r15 is 0

Garvald Street, Greenock (r18)

Belville Community Association (6), Mrs Lilian Newman (51)

- prefer to keep some of the greenspace which has proved an amenity to the area since the original demolition
- an opportunity exists for this area to have private or mixed (housing) development

Victoria/East India Harbour, Greenock (r33)

Clydeport Operations Limited (25)

- request that the LDP acknowledges the site as an effective housing site which does not require to contribute to the provision of affordable housing

Union Street, Greenock (r37)

Clydeport Operations Limited (25)

- the site should be designated as a mixed use development site, with uses to include residential, commercial and a major element of retail, in addition to being identified within the Greenock Town Centre designation within the emerging LDP

Cardwell Bay & Greenock West Community Council (37)

- the density of the housing site should reflect nearby areas

Former Greenock Academy, Greenock (r38)

Cardwell Bay & Greenock West Community Council (37)

- the density of the housing site should reflect nearby areas and should adopt a similar topography to existing buildings ie no high flats bordering the roads and only permitted where the existing school building is

Former Holy Cross School, Greenock (r39)

Cardwell Bay & Greenock West Community Council (37)

- the site should be landscaped as a community area and viewpoint, complementing the Lyle Hill monument

Former Ravensraig School, Greenock (43)

Cllr Ciano Rebecchi (21)

- identify site for one bedroom houses or an old people's residential home

Former St Gabriel's School, Greenock (r44)

Cllr Ciano Rebecchi (21), Ms Diane Rebecchi (29)

- identify part of the site for sheltered housing and part for a play area

Braeside Resident and Tenant's (61)

- removal of site from the Plan and kept as an open space or used for community play area/garden

Valley Park, Spango Valley, Greenock (r45)

Greenock Unit Trust

- no change is proposed

Cllr Ciano Rebecchi (21)

- retain site as an industrial site until the next review of the local plan

Cllr Innes Nelson (36), Mr Stuart McMillan MSP (75)

- retain site as an industrial site

Summary of responses (including reasons) by planning authority:

James Watt Dock/Garvel Island, Greenock (r15)

Clydeport Operations Limited (25)

Background – planning permission in principle for a mixed use development comprising housing, commercial, business, hotel, marina, landscaped public open space, access roads and off street car parking at James Watt Dock was granted in January 2010, with work having commenced on the site.

- welcome the support of this site as a Major Area of Change in the LDP
- acknowledge that the site has had some investment, but little different to other urban brownfield sites where some investment/remediation is also required
- the central location of the James Watt Dock site makes it particularly suitable for the development of affordable housing
- refer to Issue 6 on Affordable Housing

Garvald Street, Greenock (r18)

Belville Community Association (6), Mrs Lilian Newman (51)

Background – pre-application discussions have taken place for the development of the site by an RSL, although a planning application has not yet been received.

- site is a brownfield one within the urban area and has previously been developed for residential use
- the planning application will address the matters of open space and density
- the development of the site will require to accord with Supplementary Guidance on PAANs in regard to Open Space Provision

Victoria/East India Harbour, Greenock (r33)

Background – the detailed planning permission (2006) for the Victoria/East India Harbour site for 88 flats has now expired and no outstanding planning permission exists.

Clydeport Operations Limited (25)

- welcome the support of this site as a Major Area of Change in the LDP
- acknowledge that the site has had some investment, but little different to other urban brownfield sites where some investment/remediation is also required
- the detailed planning permission for 88 flats was not renewed and has now expired
- the central location of the Victoria/East India Harbours site makes it particularly suitable for the development of affordable housing
- refer to Issue 6 on Affordable Housing

Union Street, Greenock (r37)

Clydeport Operations Limited (25)

Background – On 2 October 2013 Clydeport Operations Limited submitted for planning permission in principle for the erection of a supermarket, associated car parking, access roads and landscaping following the demolition of existing buildings on this site. The application has not yet been determined.

- part of this site was identified as a housing opportunity site in the adopted Local Plan (2005), with the remainder being within the Town Centre – Outer Mixed/Commercial Area
- the town centre boundary has been consolidated in the LDP, drawn further away from this site, with the nature of this area being more akin to residential than town centre (refer to town centre boundary review)
- no requirement to identify any retail sites in this area (refer to Issue 10 on Town Centres)
- the site presents an excellent opportunity for a centrally located, sustainable quality residential development

Cardwell Bay & Greenock West Community Council (37)

- the planning application would address matters relating to density

Former Greenock Academy, Greenock (r38)

Cardwell Bay & Greenock West Community Council (37)

Background – the site is owned by Inverclyde Council and has been declared surplus to requirements. The site has not been marketed.

- the figures contained within Schedule 6.1 of the Plan are indicative
- the planning application would address matters relating to density

Former Holy Cross School, Greenock (r39)

Cardwell Bay & Greenock West Community Council (37)

Background – the site is owned by Inverclyde Council and has been declared

surplus to requirements. The site has not been marketed.

- drainage issues would be addressed during the consideration of a planning application

Former Ravensraig School, Greenock (43)

Cllr Ciano Rebecchi (21)

Background – the site is owned by Inverclyde Council and has been declared surplus to requirements. The site is currently being marketed for development.

- the type of housing developed on the site will be addressed during consideration of a planning application

Former St Gabriel's School, Greenock (r44)

Cllr Ciano Rebecchi (21), Ms Diane Rebecchi (29)

Braeside Resident and Tenant's (61)

Background – the site is owned by Inverclyde Council and has been declared surplus to requirements. The site has not been marketed.

- the type of housing developed on the site will be considered at the time of marketing and will be addressed during consideration of a planning application
- the amount of open space required and inclusion of play areas will be addressed in the marketing/planning brief and will require to accord with Supplementary Guidance on PAANs (no 3 on Private and Public Open Space Provision in New Residential Development)

Valley Park, Spango Valley, Greenock (r45)

Background – the site has been the subject of pre-application discussions with the owner and a draft masterplan has been produced. A planning application is expected to be submitted in the first quarter of 2014.

Greenock Unit Trust

- welcome support for the mixed use proposal at Spango Valley

Cllr Ciano Rebecchi (21), Cllr Innes Nelson (36), Mr Stuart McMillan MSP (75)

- the Spango Valley area has an over abundance of business/industrial land, which is more than sufficient to accommodate the expansion of existing business or new business wishing to locate in the area
- flooding, traffic and road safety matters will be addressed at the planning application stage
- the relative scale of the existing business and proposed residential areas are such that they would be self sustaining
- sufficient separation/buffer areas would ensure both uses would be compatible
- acknowledge the satellite nature of housing in this area, but good transport links, including a railway station

In conclusion, the Council does not propose to remove or change the sites at James Watt Dock/Garvel Island, Greenock (r15), Garvald Street, Greenock (r18), Victoria/East India Harbour, Greenock (r33), Union Street, Greenock (r37), Former Greenock Academy, Greenock (r38), Former Holy Cross School, Greenock (r39), Former Ravensraig School, Greenock (43), Former St Gabriel's School, Greenock (r44) and Valley Park, Spango Valley, Greenock (r45) in Schedule 6.1 of the LDP.

Reporter's conclusions:

Reporter's recommendations:

Issue 7(.4)	Housing Sites in the Proposed Plan – Gourock and Wemyss Bay	
Development plan reference:	Chapter 6, Policy RES3, Schedule 6.1	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Mr Barry MacPhail (13) Cllr Ciano Rebecchi (21) Scottish Power (23) Inverkip and Wemyss Bay Community Council (31) Mr Henry Craig (34) Cllr Innes Nelson (36) Cardwell Bay & Greenock West Community Council (37) Mrs Patricia Mulholland (58) Merchant Homes (60) Stuart McMillan MSP (75) Mr & Mrs Ramsay (80)</p>		
Provision of the development plan to which the issue relates:	Residential Development Opportunities	
Planning authority's summary of the representation(s):		
<p>Cove Road (Tarbet Street), Gourock (r46) Cardwell Bay & Greenock West Community Council (37)</p> <ul style="list-style-type: none"> - object to the site being designated as residential. Believe it should be designated as car parking for residents and visitors to alleviate problems of illegal parking, congestion and social decline. It will complement the neighbouring area identified for marina facilities <p>Riverside Gardens, Gourock Bay (r47) Cardwell Bay & Greenock West Community Council (37)</p> <ul style="list-style-type: none"> - the scale of the development is out of character with the waterside landscape, is a gross overdevelopment and will contribute to further road and parking issues. Recommend a significant reduction in the number of dwellings planned <p>Kempock House, Kirn Drive, Gourock (r50) Mr Henry Craig (34), Mrs Patricia Mulholland (58)</p> <ul style="list-style-type: none"> - no objections to the development of this site, but have reservations regarding the type and scale of the development. The new development would be ideal for retirement cottages, but should be similar and in keeping with the surrounding area, and take account of the problem of heavy traffic in an already congested road system - the site is marshy and drainage may be a problem for nearby households - there will be a loss of trees and wildlife 		

- there could be a loss of privacy because the area is slightly raised
- Kirn Drive is very busy and traffic jams could occur during construction
- Questions whether the schools in the catchment area will be able to accommodate new families

Mr & Mrs Ramsay (80)

- welcome the new project on this site, although have questions regarding a mutual hawthorn hedge, and the accuracy of the location of the Ash Burn on the plan

Cloch Road, Gourock (r51)

Mr Barry MacPhail (13)

- concerns about extra traffic generated by the development of this site

Merchant Homes (60)

- the designated residential development opportunity boundary should be expanded westwards to reflect the land ownership of the developer. The boundary identified on the LDP would seriously compromise the viability of the Phase 2 proposals and removes an area which was to be utilised for landscaping and the creation of an appropriate setting at this gateway approach to Gourock.

Levan Farm, Gourock (r52)

Mr Barry MacPhail (13)

- concerns about extra traffic generated by the development of this site

Former Inverkip Power Station (r57)

Cllr Ciano Rebecchi (21), Inverkip and Wemyss Bay Community Council (31),

Cllr Innes Nelson (36), Stuart McMillan MSP (75)

- the increased capacity of the site to 600 would cause a safety problem on the A78, with only one access road increasing congestion
- it would lead to overdevelopment in an area which lacks local services. The previous Local Plan capacity of 400 should not be exceeded
- support the mixed use potential of the site, but have some concerns with the residential development increasing from 400 to 600 – too big
- development would create problems with local services and transport connections with the A78

Scottish Power (23)

- supports the continued allocation of the site as a major area of change

Modifications sought by those submitting representations:

Cove Road (Tarbet Street), Gourock (r46)

Cardwell Bay & Greenock West Community Council (37)

- the site should be designated as car parking for residents and visitors

Riverside Gardens, Gourock Bay (r47)

Cardwell Bay & Greenock West Community Council (37)

- there should be a significant reduction in the number of dwellings planned

Kempock House, Kirn Drive, Gourock (r50)

Mr Henry Craig (34), Mrs Patricia Mulholland (58)

- all the relevant issues raised at the previous consultation must be taken

into consideration, particularly the additional heavy traffic
Mr & Mrs Ramsay (80)
- none specified

Cloch Road, Gourock (r51)

Mr Barry MacPhail (13)

- further traffic studies should be undertaken after completion of the new road development to establish what effect the works have had on congestion, and if not significantly reduced, there should be no new development that increases traffic on the A770

Merchant Homes (60)

- give consideration to extending the boundary of site r51 westwards to reflect land ownership

Levan Farm, Gourock (r52)

Mr Barry MacPhail (13)

- further traffic studies should be undertaken after completion of the new road development to establish what effect the works have had on congestion, and if not significantly reduced, there should be no new development that increases traffic on the A770

Former Inverkip Power Station (r57)

Cllr Ciano Rebecchi (21), Stuart McMillan MSP (75)

- a reduction from 600 to 400 houses, in line with the adopted Plan, is sought

Cllr Innes Nelson (36)

- a reduction from 600 to 400 houses, in line with the adopted Plan, is sought, or less if changes can be made, or returned to the Green Belt

Inverkip and Wemyss Bay Community Council (31)

- seeking developer contributions to cover a new roundabout or traffic lights

Scottish Power (23)

- proposes no change to the LDP

Summary of responses (including reasons) by planning authority:

Cove Road (Tarbet Street), Gourock (r46)

The site is owned by Inverclyde Council but has not yet been marketed.

Cardwell Bay & Greenock West Community Council (37)

- has been a housing land supply site since the previous Plan – check
- site would be better to be developed from a urban design perspective
- illegal parking and congestion are matters to be addressed through traffic management and, where appropriate, enforcement

Riverside Gardens, Gourock Bay (r47)

Cardwell Bay & Greenock West Community Council (37)

- the numbers identified on Schedule 6.1 are indicative
- a higher density proposal in this the central location would contribute towards a more sustainable approach to development
- a planning application would address roads and parking matters

Kempock House, Kirn Drive, Gourock (r50)

Mr Henry Craig (34), Mrs Patricia Mulholland (58)

Mr & Mrs Ramsay (80)

Background – the site is owned by Inverclyde Council and is currently on the market.

- welcome the support for the principle of development on this site
- the nature of the housing to be developed on the site has yet to be determined, but note that Schedule 6.1 identifies it as a 'quota' site
- matters of drainage, traffic, trees, wildlife and privacy will be addressed at the planning application stage
- the schools within the area have capacity to accommodate the number of pupils that a development of this scale would produce (info required from Education)

Cloch Road, Gourock (r51)

Mr Barry MacPhail (13)

Merchant Homes (60)

Background – planning permission granted for phase 1 (38 flats) in December 2012, and construction is underway. Pre application discussions have been held for development of the larger site.

- the generation of traffic is addressed at the planning application stage, approval having been granted for phase 1
- the full ownership of the site has not been identified as a Residential Development Opportunity site because part of the site needs to be retained for a suitable landscaped entrance (check what discussions have taken place with DA)

Levan Farm, Gourock (r52)

Mr Barry MacPhail (13)

Background - the site was included as a Housing Opportunity site (ho57) in the adopted Local Plan by the reporter following the Local Plan Inquiry in 2004. The site currently has planning permission in principle for a residential development, a permission which has been renewed every three years since October 2006.

- while there is no indication when the site will be developed, a planning application will address all matters relating to traffic

Former Inverkip Power Station (r57)

Cllr Ciano Rebecchi (21), Inverkip and Wemyss Bay Community Council (31),

Cllr Innes Nelson (36), Stuart McMillan MSP (75)

Scottish Power (23)

Background – a planning application in outline for a mixed use 'Urban Village' development was submitted in June 2009, and has not been determined.

- the ILP identified 400 as being the indicative capacity of the site
- the 'urban village' design led approach to the development of this site in pre application discussions has concluded that the capacity can be increased to 600, a figure that has been accepted by both Transport Scotland and the Council's Environmental and Commercial Services (Roads)
- the masterplan identifies the opportunity for uses other than housing, including local retail, hotel, marina, as well as a coastal path and access network
- new and existing woodland and improvements to watercourses

- any new access that is required to be provided will be the responsibility of, and at the cost to the developer of the site

In conclusion, the Council does not propose to remove or change the sites at Cove Road (Tarbet Street), Gourock (r46), Riverside Gardens, Gourock Bay (r47), Kempock House, Kirn Drive, Gourock (r50), Cloch Road, Gourock (r51), Levan Farm, Gourock (r52), Former Inverkip Power Station (r57) in Schedule 6.1 of the LDP.

Reporter's conclusions:

Reporter's recommendations:

Issue 8	Smithy Brae, Kilmacolm	
Development plan reference:	Chapter 6, Policy RES3, Schedule 6.1 (b), Policy RES4, Policy SDS8 and Policy ENV2	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Ms Alda Clark (5) Ms Catherine Harbon (19) Mr David Eagle (24) Cllr David Wilson (28) Mr James Fraser-Campbell (40) Ms Johanna Iannetta (41) Mr John Watson (46) Ms Katrin Eagle (48) Mr Mark Beverstock (53) Mr & Mrs Stevenson (57) Kilmacolm Civic Trust (63) Mr Ross Wood (67) Kilmacolm Community Council (71) Dr Tom Fyfe (79)</p>		
Provision of the development plan to which the issue relates:	Green Belt boundary adjustment to enable housing development opportunity site, Smithy Brae (LDP ref. r60) to be developed with a mix of dwelling types and tenure, including provision for affordable housing.	
Planning authority's summary of the representation(s):		
<p>Traffic, Access and Parking Ms Alda Clark (5), Ms Catherine Harbon (19), Mr James Fraser-Campbell (40), Ms Johanna Iannetta (41), Mr John Watson (46), Ms Katrin Eagle (48), Mr & Mrs Stevenson (57), Kilmacolm Civic Trust (63), Mr Ross Wood (67), Kilmacolm Community Council (71), Dr Tom Fyfe (79)</p> <p>Concern that the proposed increase in houses at Smithy Brae would not be able to take the traffic produced by the development as it is too steep and narrow. The traffic problems, including construction traffic, created by the proposed development would be a danger to both pedestrians and motorists. The road itself is in disrepair from the 31 homes that use it, and with the burn and services that run under the road, it cannot accommodate heavy traffic. Other users of Smithy Brae include BT (telephone exchange), the chapel on a Sunday, and possibly parking and delivery required as part of the redevelopment of the Institute site.</p> <p>Kilmacolm is already congested and parking is a daily problem. The exit and entry to the proposed site are problematic due to traffic flow, the number of converging junctions and poor road marking, and causes problems during the winter months. Development on the Smithy Brae site could also lead to potential further demands to allow traffic to exit onto Whitelea Crescent and Gibson Lane.</p>		

Flooding

Ms Alda Clark (5), Mr David Eagle (24), Mr & Mrs Stevenson (57)

Smithy Brae has a burn running under it and flooding is a problem. The Green Belt part of the proposed development site is a flood plain which acts as an overflow for water from two streams, with the situation being much worse if the land was developed.

Wildlife and Amenity

Mr David Eagle (24), Ms Katrin Eagle (48), Mr & Mrs Stevenson (57), Kilmacolm Community Council (71),

While the site of the former gasworks would be improved by development, it is not bad enough to warrant the destruction of the Green Belt to achieve this. The site is swiftly reverting to nature. This area of Green Belt is an attractive strip of countryside extending into the heart of the village, allowing wildlife close to houses, children exploring and sledging in the winter and people walking their dogs. Concern about the impact on wildlife, the loss of a recreation area and the impact on access to the cycle track.

Substantial development at this location would be detrimental to the attractive rural character of the area, Smithy Brae being one of the attractive green wedges leading into the village. There would also be a loss of outlook and views towards village centre.

Precedent

Mr James Fraser-Campbell (40), Mr & Mrs Stevenson (57), Kilmacolm Civic Trust (63), Dr Tom Fyfe (79)

Green Belt release here would establish a dangerous precedent, lead to renewed attempts to have land released in this area and threaten the green wedge of countryside extending to the heart of the village.

Green Belt

Ms Catherine Harbon (19), Mr David Eagle (24), Ms Katrin Eagle (48), Mr Mark Beverstock (53), Mr Ross Wood (67),

Objection to the proposals to build on Green Belt land around Kilmacolm, the Smithy Brae site in particular, as it goes against SDP and LDP guidelines and policy for Green Belt land specifically, including RES7. The nature of the village would be permanently damaged and goes against policy SDS8 which states that there is a presumption against the spread of the built up area into the designated green belt.

Scottish Executive SPP 21 states that there is a strong presumption against inappropriate development in the green belt. Appropriate uses include agriculture, woodland and forestry, horticulture and recreational use. Other uses may still be considered appropriate if a national priority or to meet an established need, on the basis that no other suitable site being available. It has not been demonstrated that no other suitable sites are available.

The proposed change to the Green Belt boundary has not been made clear, or

properly justified.

Financial Considerations

Mr David Eagle (24), Kilmacolm Civic Trust (63), Kilmacolm Community Council (71)

Since the financial crash, development in the village has massively slowed down, and the developer of the approved part of the Smithy Brae site has gone into liquidation. There is an extant planning permission for 23 dwellings on part of the site, and the fact that this development has not yet started is due to the economic situation rather than the flawed nature of the existing permission. Very little other development has taken place in the village over the same period.

The case the developer has made for lopping off a proportion of the southern tip of the Green Belt lung is unconvincing – the costs need to be scrutinised. In addition the contamination issues on the site require remediation and this cost should be reflected in the land price.

The proposed development is predicated on the release of Green Belt land for no good reason, apart from commercial gain for the developer.

Housing Supply/Affordable

Ms Catherine Harbon (19), Mr David Eagle (24), Mr John Watson (46), Ms Katrin Eagle (48), Mr Mark Beverstock (53)

There is no need for further housing in Kilmacolm, with various brownfield sites offering a significant number of new homes. The LDP states that there is no justification for major housing development. It also states that there is no requirement for strategic release of Greenfield land for housing on the edge of the urban settlement boundaries. A large proportion of new housing in Kilmacolm has also been omitted from the LDP, the former Institute building being an example.

Affordable housing does not meet the definition of appropriate uses in the Green Belt, and the exceptional need for affordable housing in Kilmacolm has not been established. Neither has it been demonstrated that no other suitable sites are available.

The target market for the proposed development is adequately catered for within the local area.

The use of affordable housing to meet the needs of the elderly is inappropriate and too insensitive an approach to a very particular need. The Council's use of data in the Supplementary Guidance on Affordable Housing is contradictory, paragraph 3.5 suggesting high rental levels in Kilmacolm, with table 1 showing otherwise.

The Council does not apply the affordable housing policy on its own or other sites, examples being the former library site (former Institute building), Balrossie and the former Quarry site.

Miscellaneous

Mr Mark Beverstock (53)

Notes that the LDP Working Group meeting of 7 March 2013 agreed to the release of Smithy Brae, but does not have the authority to do so. No basis for this decision was given. The overall context of the meeting was that there was no need for strategic release of housing land, but Kilmacolm required some flexibility of supply – not an exceptional reason.

Kilmacolm Civic Trust (63)

There will be negligible community benefit.

The concept of development at Smithy Brae is ill thought through as it does not take into account the redevelopment of the old Community Centre with which this site was originally linked in the Post-Main Issues Report

Mr David Eagle (24), Mr John Watson (46)

The need to release Green Belt to enable development is inappropriate, and it is not clear what policy framework permits this other than for historical estates.

All previous attempts to develop this site and adjacent areas have been rejected by the government's Inquiry Reporter, in support of the Council's position.

Cllr David Wilson (28)

Disagrees with the identification of Smithy Brae (site r60) as a residential development opportunity site.

Ms Catherine Harbon (19)

Any traffic control measures put in place on Smithy Brae would be in opposition to the Council's conservation area plans.

Sustainable transport links (Chapter 5 of the LDP) are not in place, with no provision to put them in place, especially considering the targeted market of Renfrewshire's SHM.

Modifications sought by those submitting representations:

Ms Alda Clark (5), Mr David Eagle (24), Cllr David Wilson (28), Mr James Fraser-Campbell (40), Ms Johanna Iannetta (41), Ms Katrin Eagle (48), Mr & Mrs Stevenson (57), Kilmacolm Civic Trust (63), Mr Ross Wood (67), Dr Tom Fyfe (79)

No specific modifications stated, but assume the removal of the Green Belt part of the proposed Smithy Brae site is sought.

Ms Catherine Harbon (19)

The release of Green Belt land at the Smithy Brae site is dropped from the LDP and the housing stock is reviewed.

Mr John Watson (46)

Delete extension of site r60 into the Green Belt. Retain as 23 houses. Identify whether this should be reserved in all or part for the elderly as a specialist housing group but not as affordable.

Mr Mark Beverstock (53)

The change in designation of Green Belt land for the site at Smithy Brae should be removed from the development plan.

Kilmacolm Community Council (71)

The residential development opportunity at Smithy Brae should be limited to the area and the number of new dwellings envisaged in the existing permission.

Summary of responses (including reasons) by planning authority:

General Statement

- the part of the site currently within the settlement boundary has been the subject of two planning applications, one for 4 mews cottages (approved in May 2007) and one for 2 semi detached houses and 21 flats (refused in October 2007 and approved on appeal in May 2008)
- neither has been developed because of the significant difficulties relating to the area despite the planning approvals, and the extension to the overall development footprint will enable the site to be developed in a comprehensive manner
- opportunity to remove a problematic site (contamination, flooding, poor access, derelict building) with only a relatively minor incursion into the Green Belt
- brings together multi ownership site to result in a single cohesive development
- opportunity to provide a significant proportion of affordable housing for starters and downsizing for the elderly
- most sustainable location for new housing in Kilmacolm being very close to the village centre and all its facilities

Traffic, Access and Parking

- comments from Roads at Post-MIR stage stated that junction improvements would be required and that other potential access points would need to be investigated further
- traffic matters and the capacity of the road and junction would be dealt with at the planning application stage, and would influence the number of units
- all users would benefit from an improved and safer road
- car parking for new housing would meet the standards required by the roads authority
- with the construction of a new road, parking would be formalised

Flooding

- a flood risk assessment would be required – see Post-MIR document
- opportunity to remove existing flooding problem

Wildlife and Amenity

- there are no nature conservation designations on the site
- the opportunity to access the countryside for recreation purposes would remain
- access to the cycle track would be retained as part of any approved development – would be addressed in the planning application
- most of the green wedge at this location would be retained

Precedent

- this release is for a very specific purpose – to remove a blighted site – and does not set a precedent
- letter from landowner gifting remaining Green Belt land to the community

Green Belt

- the principle of Green Belt release remains
- this release is for a very specific purpose – to remove a blighted site
- a significant green wedge would be retained
- justification for release is to address very specific problems associated with the site – contamination, flooding, poor access, derelict building

Financial Considerations

- acknowledge that the current financial situation has not helped matters, but the non development of the site is primarily down to the piecemeal nature of the previous proposals, the multi ownership and an underestimation of the costs associated with the removal of contamination
- opportunity here to bring the site together as one single, cohesive development

Housing Supply/Affordable

- refer to other schedule 4

Miscellaneous

- the LDP working group were set up as a sounding board, with the decisions taken by the full committee
- the community will benefit by the removal of an unsightly and problematic site, in addition to the provision of affordable housing and housing for downsizing. Local residents and users of Smithy Brae will also benefit by improved access
- the Council was obliged to market the former Institute building to achieve the best financial return
- the term 'enable' is not only associated with historic estates.....
- a larger site has been rejected by the Council and Reporter previously, but change in circumstances.....
- proposed conservation area has yet to be approved and if a controlled junction is needed it should not detract from the status of the area
- most sustainable site in Kilmacolm – see Post-MIR (169m to village centre, and bus stop information)

In conclusion, the Council does not propose to remove or change the site at Smithy Brae, Kilmacolm (r60) in Schedule 6.1 of the LDP.

--

Reporter's conclusions:

--

Reporter's recommendations:

--

Issue 9 (.1)	Housing Sites Not Included in the Proposed Plan: Milton Wood (Police House Field site), Kilmacolm	
Development plan reference:	Chapter 6, Policy RES3, Schedule 6.1(b) and Policy RES7	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Duchal Estate (73)</p> <p>Mr Alan Connell (3) Ms Ann Ferris (11) Mr Archibald Brown (12) & Friends of Milton Wood (FoMW) * Mr Billy Pickett (14) * Mr Bryon Evans (17) & FoMW * Mr David Walker (27) Mrs Donna Pickett (30) & FoMW Mr Graham Biggart (32) ** Mrs Isobel Evans (38) & FoMW * Mrs Lynda Connell (52) * Mr Ralph Leishman (62) * Ms Rosemary Biggart (65) Ms Susan Biggart (76)</p>		
Provision of the development plan to which the issue relates:	Objection to the omission of housing development opportunity at Milton Wood, Kilmacolm	
Planning authority's summary of the representation(s):		
<p><u>Duchal Estate</u> (73)</p> <p>Policy RES3: representation is made against this policy as it does not identify the proposed residential development on the former police house field, within Milton Wood, off Lochwinnoch Road, Kilmacolm.</p> <p>Schedule 6.1: requested that the 'police house field' site be identified in the Schedule and indicated on the Proposals Map. This requires the release of the 'police house field' from the Green Belt (under Policy ENV2), as it is stated that this field is the 'optimum site for development', as it is in close proximity to Kilmacolm service centre.</p> <p>Policy RES7: the case is presented (in a supporting Planning Statement), that the police house field, part of Duchal Estate, is not considered an area of land that constitutes the character of greenbelt. An area to the south of the proposed field is brownfield due to its former use as a sewage treatment works, and a Landscape Assessment is submitted demonstrating that the area (in part), is suitable for development purposes.</p> <p>The site is considered effective and acceptable in terms of landscape setting,</p>		

traffic, ground conditions, habitat surveys, and free from environmental and site constraints.

The majority of the site has previously been tested through a planning application, albeit for different uses (a substantial school development, with new access and community car park), where Inverclyde Council Planning Department recommended approval of development at this location. There were no objections from any statutory consultees, including Scottish Natural Heritage.

In summary, the proposal is considered to be of lesser impact despite being spread over a wider area. In detail (but still indicative), the residential part of the proposal is for some 42 houses, comprising 20 general needs 'family housing' (3, 4 & 5 bedrooms, the latter numbering five and described as 'high end'); 30% affordable housing (12 homes); and a number (10) 'barrier-free' retirement properties/bungalows for local needs.

The development footprint is largely confined to the 'open' field of rough pasture land, avoiding the woodlands to the west, which coincides with the designated SINCC. The Planning Statement also refers to the previous school application and its proposal for a community car park, which this proposal also includes, and a network of footpaths and the 'opportunity to include playing fields' to the south, a use acceptable as a greenbelt use. The latter is lacking detail at this stage, but can be 'dealt with at any future application stage'.

Mr Alan Connell (3)

Ms Ann Ferris (11)

Mr Archibald Brown (12) FoMW *

Mr Billy Pickett (14) *

Mr Bryon Evans (17) & FoMW *

Mr David Walker (27)

Mrs Donna Pickett (30) & FoMW

Mr Graham Biggart (32) **

Mrs Isobel Evans (38) & FoMW *

Mrs Lynda Connell (52) *

Mr Ralph Leishman (62) *

Ms Rosemary Biggart (65)

Ms Susan Biggart (76)

All of the above have signed a supporting statement on the Sustainable Spatial Strategy of the LDP and in particular the defining of the inner Green Belt boundary around Kilmacolm (summarized in their support for paragraphs 2.44 and 2.50 (in full)). It is therefore inferred that those representees not members of Friends of Milton Wood are also against the release of Green Belt at Milton Wood.

The continuing protection of Kilmacolm's Greenbelt, as evidenced by the rejection earlier this year of a planning proposal that included a substantial school building, community car park and two-lane, paved road accessing these developments, and which threatened a distinctive Greenbelt wedge, has been welcomed by the community. This Green belt wedge within Milton woods has been a continual target of planning proposals over the last 25 years. This distinctive, well-loved landmark is visible from the majority of the village and carries a number of levels

of protection, including SINC and Green Belt status. It is part of the Core Path Scheme and is included in Historic Scotland's Gardens and Designed Landscapes inventory.

In January this year, a Tree Preservation Order (TPO) was drafted and submitted by the group known as "Friends of Milton Woods", to ensure the ongoing protection of the area known as Milton/Duchal Woods. Refer to **Issue 15**.

Delighted and relieved to note the continued protection of Green Belt in Kilmacolm and of Milton/Duchal Woods and its immediate surroundings. I find it particularly heartening, bearing in mind the history of continual pressure on this area and its surrounding environs for development.

It is a unique landscape within the heart of the village, used by the local and wider community on a regular basis for recreation, while supporting a safe environment for local children, giving them access to the countryside and promoting recreational and educational use.

The Council supported Core Path gives access to a wildlife corridor through the centre of the village; the entrance alone is a well-known historic landmark, and 'anyone that visits or has lived in the village recognises the distinctive nature of the entrance.' The Woods are a tourist attraction and the walkers and recreational visitors bring trade to the village. Also, with the historic centre of the village under consideration for a Conservation Area within its heart, why just protect the centre when the woods are the background of the village and provide the community with its distinctive rural ambiance.

Modifications sought by those submitting representations:

Duchal Estate (73)

Remove the Police House Field, Lochwinnoch Road, by Milton Wood, part of Duchal Estate from the Green Belt and allocate the site as a residential development opportunity in Schedule 6.1, under Policy RES3, and amend the Proposals Map accordingly.

All other representations listed above (14): no modifications sought.

Summary of responses (including reasons) by planning authority:

The response to this objection to the LDP by Duchal Estate is informed by the planning history of the site, including the most recent planning application for a school development for St. Columba's School, and associated car park and access off Lochwinnoch Road (refused in January 2013). The following Background Reports are of relevance:

- * Planning Appeal 1993
- * LPI 2004
- * Head of Regeneration and Planning's Report on the St. Columba School proposals to the Planning Board, January 2013 and Council decision

The proposal submitted is considered to be "of lesser impact despite being spread

over a wider area.” This is a curious statement since the potential extent of the proposed development extends the full length of the Green Belt wedge from the centre of Kilmacolm to the boundary of the SINC, south of the corresponding residential area to the west. This is the main reason for those in support of the LDP objecting to any development on Milton Wood. It is inappropriate therefore, to compare this housing development proposal with the school proposals that were refused by the Council in January 2013, in terms of both scale and use.

The claims of lesser impact presumably relate to the proposed development footprint being largely confined to the ‘open’ field of rough pasture land, avoiding the woodlands to the west, which coincides with the designated SINC. However, by developing the ‘police house field’, the entire amenity and landscape value of this sensitive wedge will be compromised, especially when viewed from the north and the Lochwinnoch Road entrance, and the full length of the Sustrans (walking/cycling) route running along the east of the site.

It is acknowledged that some of the residential components of the proposal, in particular the 30% affordable housing contribution of 12 homes and the estimated 10 ‘barrier-free’ retirement properties/bungalows for local needs, would contribute to the affordable housing requirements in the *Glasgow and the Clyde Valley Housing Need and Demand Assessment* (June 2011) and subsequently identified for this Sub Area in the Inverclyde LHS 2011-2016. However, it is considered that there is adequate provision identified in the LDP.

Reflecting on both the Planning Appeal decision of 1993 and the Reporter’s conclusions following the 2004 LPI, and noting too the Reporter’s comment that ‘very little has changed since 1993’, and indeed again since, Milton Wood remains ‘important to the landscape setting of Kilmacolm’. Having said that, it is acknowledged that the conclusions reached on the affordable housing element of the proposal at that time for Milton Wood (refer to Volume 2: Housing, page 150, paragraphs 7.363-364), was that the north eastern part of the site had potential capacity without adverse effect on the landscape.

Since the LPI, the Council has brought forward Policy RES4 to allow for exceptional release of the Green Belt for the sole purpose of meeting local affordable housing requirements, without the need for a much larger and unnecessary level of development, such as the full 42 site capacity being proposed. Policy RES4 should sit alongside Strategy Support Measure No.10 in the *Glasgow and the Clyde Valley Strategic Development Plan (2012)*, and is intended to provide a similar, but arguably more robust basis for ensuring land release solely for affordable housing needs where considered necessary, to that in the former *Glasgow and the Clyde Valley Joint Structure Plan (2006)*, and in accordance with Scottish Government SPP (2010) and PAN 2/2010. However, the proposed affordable housing provision in the LDP is considered adequate (refer to **Issue 6**).

In a similar way that very little had changed in terms of the importance of this Green Belt wedge between 1993 and 2004, little has changed with respect to the need to develop a much larger site than would be necessary to meet the actual needs identified, i.e. for more affordable homes, not ‘high end’ general needs housing. The Reporter for the 2004 LPI made specific reference to this approach,

stating “no secret is made of the fact that any such need (for affordable housing) can only reasonably be funded by the provision of a substantially greater number of mainstream private houses – a sort of ‘Trojan Horse’ situation, often described as ‘enabling development’” [refer to Volume 2: Housing, page 82, para 7.87]. The potential adverse environmental and landscape implications of planning for affordable housing in smaller settlements such as Kilmacolm explains why Policy RES4 has been drafted in the way it has, to obviate such an outcome. Taking this into account and in terms of land release, the development proposed would be considerable in terms of impact, compared to the school proposal.

As the proposed development stands currently, extending over an extensive area of Milton Wood to accommodate up to 42 dwellings, it is recommended no modifications be made in relation to this objection to the omission of the ‘police house field’, Milton Wood, Kilmacolm.

Reporter’s conclusions:

Reporter’s recommendations:

Issue 9(.2)	Housing Sites Not Included in the Proposed Plan: Old Hall, off Quarry Drive, Kilmacolm																	
Development plan reference:	Chapter 6, Policy RES3, Schedule 6.1(b) and Policy ENV1	Reporter:																
Body or person(s) submitting a representation raising the issue (including reference number):																		
<table border="0"> <tr> <td>Alan Connell (3)</td> <td>Friends of Milton Woods (Isobel Evans) (38)</td> </tr> <tr> <td>Ann Ferris (11)</td> <td></td> </tr> <tr> <td>Friends of Milton Wood (Archibald Brown) (12)</td> <td>Lynda Connell (52)</td> </tr> <tr> <td>Billy Pickett (14)</td> <td>Mactaggart & Mickel Homes Ltd. (55)</td> </tr> <tr> <td>Friends of Milton Woods (Bryon Evans) (17)</td> <td>Ralph Leishman (62)</td> </tr> <tr> <td>David Walker (27)</td> <td>Rosemary Biggart (65)</td> </tr> <tr> <td>Friends of Milton Wood (Donna Pickett) (30)</td> <td>Susan Biggart (76)</td> </tr> <tr> <td>Graham Biggart (32)</td> <td></td> </tr> </table>			Alan Connell (3)	Friends of Milton Woods (Isobel Evans) (38)	Ann Ferris (11)		Friends of Milton Wood (Archibald Brown) (12)	Lynda Connell (52)	Billy Pickett (14)	Mactaggart & Mickel Homes Ltd. (55)	Friends of Milton Woods (Bryon Evans) (17)	Ralph Leishman (62)	David Walker (27)	Rosemary Biggart (65)	Friends of Milton Wood (Donna Pickett) (30)	Susan Biggart (76)	Graham Biggart (32)	
Alan Connell (3)	Friends of Milton Woods (Isobel Evans) (38)																	
Ann Ferris (11)																		
Friends of Milton Wood (Archibald Brown) (12)	Lynda Connell (52)																	
Billy Pickett (14)	Mactaggart & Mickel Homes Ltd. (55)																	
Friends of Milton Woods (Bryon Evans) (17)	Ralph Leishman (62)																	
David Walker (27)	Rosemary Biggart (65)																	
Friends of Milton Wood (Donna Pickett) (30)	Susan Biggart (76)																	
Graham Biggart (32)																		
Provision of the development plan to which the issue relates:	Objection to the omission of housing development opportunity at Old Hall, off Quarry Drive, Kilmacolm.																	
Planning authority's summary of the representation(s):																		
<p><u>Mactaggart & Mickel Homes Ltd.</u> (55)</p> <p>Representation is lodged to Policy RES3 and Policy ENV1 in relation to the Green Belt boundary at Old Hall, Kilmacolm, and objection submitted to the non allocation of the site as a residential development opportunity in the LDP: Proposals Map B.</p> <p>The Old Hall site should be included as a residential development opportunity in Schedule 6.1, as it is 'wholly effective and deliverable'. The site extends to 3.9 hectares and has 'the capacity to accommodate mainstream and affordable housing', of approximately 70-80 houses. It is virtually flat or gently sloping and an almost self-contained pair of fields, 'that give onto the roundabout on Wateryetts Drive'. A planning statement and full landscape analysis of the site in a supporting document is included in the submission.</p> <p>The supporting document makes reference to housing need assessments in 2004 and 2008 and referring to the LDP: Proposed Plan states that it "rightly recognises that housing affordability remains a problem in Kilmacolm." It is maintained, "Given the various constraints on the delivery of affordable housing, market housing, can, and often does, act as enabling development to fund the development of new affordable housing. In order to achieve delivery of affordable housing, the LDP must allocate land for both affordable and market housing. Land for affordable housing, plus enabling development, is most likely to be found within the Green Belt, as there are no other locations available in communities</p>																		

such as Kilmacolm.”

In relation to **paragraph 2.56** (and **Policy SDS8**), the Old Hall site should be removed from the Green Belt. Residential development on this site will have minimal impact on the Green Belt, forming a natural extension to the development fingers while not affecting the green wedges, allowing the village to maintain its green links. The opportunity for brownfield development is severely limited in Kilmacolm, therefore land is required to be removed from the Green Belt to allow development. As stated in SPP, Green Belt designation should direct development to suitable locations, not prevent it.

SPP further states that green belt boundaries in LDPs should reflect long term settlement strategy and ensure that settlements are able to accommodate planned growth. Inner boundaries should not be drawn too tightly around the urban edge, but where appropriate should create an area suitable for planned development between the existing settlement edge and green belt boundary (SPP, para 162). Boundaries should also take into account the need for development in smaller settlements within the green belt, and where appropriate leave room for expansion.

The Old Hall site’s designated Green Belt boundary follows the rear gardens of the houses along Port Glasgow Road and Springwood Drive. The site fulfils neither the green belt purpose of protecting the landscape setting of the town: ‘it is an almost hidden site’; nor that of protecting and giving access to open space: ‘there is no public access to the site’.

SPP suggests that green belt boundaries should follow strong visual or physical features such as rivers, tree belts and main roads, and hedges and field boundaries (such as the green belt around this site), rarely provide a robust boundary.

There is a natural strong boundary along the line of the mature tree belt past the cemetery, and along the tree belt to Planetreeyetts Farm that meets the criteria set out in SPP. Realigning the boundary to here would provide a natural long term defensible boundary rounding off the form of the village and reducing ribbon development, It would release an effective and sustainable development site and provide an area of ‘white land’ between Old Hall and the cemetery (outwith the green belt but protected by countryside policies) which would leave room for expansion in a future plan period without revisiting the green belt boundaries.

Alan Connell (3)

Ann Ferris (11)

Friends of Milton Wood (Archibald Brown) (12)

Billy Pickett (14)

Friends of Milton Woods (Bryon Evans) (17)

David Walker (27)

Friends of Milton Wood (Donna Pickett) (30)

Graham Biggart (32)

Friends of Milton Woods (Isobel Evans) (38)

Lynda Connell (52)

Ralph Leishman (62)

Rosemary Biggart (65)

Susan Biggart (76)

All of the above submitted support for the retention of the current Green Belt boundary of Kilmacolm and Quarrier's Village, to ensure the nature of the area whilst protecting the heritage and feel of the villages. It is inferred therefore that these representations are against any release of Green Belt at Old Hall.

Modifications sought by those submitting representations:

Mactaggart & Mickel Homes Ltd. (55)

Remove site at 'Old Hall' from the Green Belt and allocate it as a residential development opportunity in Schedule 6.1 and on the Proposals Map.

Alan Connell (3)	Friends of Milton Wood (Donna Pickett) (30)	Rosemary Biggart (65)
Ann Ferris (11)	Graham Biggart (32)	Susan Biggart (76)
Friends of Milton Wood (Archibald Brown) (12)	Friends of Milton Woods (Isobel Evans) (38)	
Billy Pickett (14)		
Friends of Milton Woods (Bryon Evans) (17)	Lynda Connell (52)	
David Walker (27)	Ralph Leishman (62)	

All of the representations listed above (13): no modification sought.

Summary of responses (including reasons) by planning authority:

The response to this objection to the LDP by Mactaggart & Mickel Homes Ltd is informed by the planning history of the site, including the LPI of 2004 and a more recent planning application for the same site (which was refused in September 2004).

The following Planning History and Background Reports are of relevance:

- * Planning Application and Council decisions: 2004
- * LPI 2004

Reflecting on the history of proposals for housing development on this site and the Reporter's conclusions following the 2004 LPI, and noting too that the strategic requirement for housing land release remains unchanged [source: *Glasgow and the Clyde Valley Housing Need and Demand Assessment* (June 2011)], there is no justification for the release of this site for between 70-80 dwellings to accommodate general needs (private sector) housing and an unspecified number of 'affordable homes' in the Renfrewshire SHMA.

The supporting document, having rehearsed out of date housing need studies between 2004 and 2008, suggests, because of "various constraints on the delivery of affordable housing, market housing, can, and often does, act as enabling development to fund the development of new affordable housing." It is claimed that in order to achieve delivery of affordable housing, the LDP must allocate land for both affordable and market housing and that this land "is most

likely to be found within the Green Belt, as there are no other locations available in communities such as Kilmacolm.” In this regard, it is incorrect to state that no other locations (sites) are available in Kilmacolm and other communities within the relevant SHMA, Renfrewshire, to provide for such demands, and in the Inverclyde HMA, for such needs.

Since the LPI, the Council has brought forward Policy RES4 to allow for, among other initiatives to assist affordable housing provision across the authority, a policy for targeted sites for development by RSLs and for exceptional land release from the Green Belt for the sole purpose of meeting local affordable housing requirements. The latter aspect above of Policy RES4 is designed expressly for this type of situation where it would be quite unjustified and inappropriate to develop a much larger and unnecessary amount of land, such as the full 70-80 site capacity being proposed, to deliver a much smaller requirement for affordable homes. The Reporter for the 2004 LPI made specific reference to this possibility, stating “no secret is made of the fact that any such need (for affordable housing) can only reasonably be funded by the provision of a substantially greater number of mainstream private houses – a sort of ‘Trojan Horse’ situation, often described as ‘enabling development’” [refer to Volume 2: Housing, page 82, para 7.87]. The potential adverse environmental and landscape implications of planning for affordable housing in smaller settlements such as Kilmacolm explains why Policy RES4 has been drafted in the way it has, to avoid such an outcome.

It is in this context of release specifically for affordable housing requirements, that another conclusion of the 2004 LPI Reporter on the affordable housing element of the proposal at that time for Old Hall (refer to Volume 2: Housing, pages 156-158, paragraphs 7.389-397), expressed the opinion ‘that only if a greenfield site is required for affordable housing and the north eastern part of the Milton Wood site is considered unsuitable, should consideration be given to Old Hall’.

Policy RES4, together with the supporting Supplementary Guidance, is intended to work alongside Strategy Support Measure No.10 in the *Glasgow and the Clyde Valley Strategic Development Plan (2012)*, to provide a similar basis, but arguably more robust policy for ensuring land release solely for affordable housing needs where considered necessary, to that in the former *Glasgow and the Clyde Valley Joint Structure Plan (2006)*. Taken together, these policy levers are in accord with Scottish Government SPP (2010) and PAN 2/2010 and should obviate under most circumstances any need for such ‘enabling development’. Irrespective of this, the proposed affordable housing provision in the LDP is considered adequate (refer to **Issue 6**).

Little has changed with respect to the claim that, to provide for affordable homes in Kilmacolm a much larger release of Green Belt land is necessary to meet the actual needs identified, i.e. for more affordable homes, not open market private sector housing. In terms of the latter, the conclusion of the *Glasgow and the Clyde Valley Strategic Development Plan (2012)* is that there is more than adequate land to provide for assessed private sector requirements, to 2025, within the relevant SHMA – Renfrewshire.

Little has changed also since 2004 in terms of the importance of the Green Belt boundary in this locality to suggest that the development of Old Hall would lead to

a more sustainable and permanent boundary. It is not accepted that the site, because it is 'almost hidden' would have less landscape impact than the two principle green wedges. The two fields comprising the site cover a fairly large area, so the suggestion that this is some 'natural extension of a gap site' is incorrect. For those residents living adjacent on Port Glasgow Road and Springwood Drive, there would be a similar level of impact to those residents affected by any development of the green wedges.

There is no clear justification presented for establishing what is claimed to be a more permanent, defensible Green Belt boundary further out to the cemetery to accommodate this development. Mention is made of there being no public access to this part of the Green Belt, but SPP does not say that this is a necessary function of green belts. However, it was clear at the time of the 2004 LPI that this underused farmland is used by local residents to walk their dogs and ride horses. And in relation to the accesses shown to the proposed site in the supporting document, it should be noted that the land immediately to the north west of the roundabout on Wateryetts Drive adjacent to the site, is designated Open Space in the Proposed Plan, with ready access to the fields now.

The Green Belt Review undertaken for the LDP made clear in its guiding principles the inappropriate 'blanket approach' outlined in SPP to defining green belts around settlements, and in particular smaller settlements surrounded by green belt. The identification of 'white land' is relevant and appropriate as a general principle in defining green belt boundaries where for example, there is pressure for development and in areas of growth. But, this is not so for all settlements. In settlements such as Kilmacolm and Quarrier's Village, the view taken by the Council is that the environment and landscape setting is of great value in the determination of those matters relevant to the LDP's settlement strategy and in any case, areas of 'white land' are not appropriate while there is no strategic requirement for release for housing. For further justification for the validity of the Council's approach to defining the inner Green Belt boundary in the way it has, refer to the Reporter's Report on the 2004 LPI, Volume 2: Housing, page 98, para 7.158/158A.

The case presented for an even more extensive area of 'white land', including the countryside out to what is claimed to be "a natural strong boundary along the line of the mature tree belt past the cemetery, and along the tree belt to Planetreeyetts Farm (to) leave room for expansion in a future plan period without revisiting the green belt boundaries", is contrary therefore, to the underlying principle considered appropriate and necessary to safeguard the landscape setting of Kilmacolm. The foundation of the settlement strategy in this locality requires what has been presented in the LDP: a tightly drawn Green Belt boundary that was found to have merit and purpose at the 2004 LPI. Insofar as the housing land requirement has not changed significantly since, there is no case for amending the Green Belt in such a radical way when there is no need to find 'room for expansion', at least under the current *Glasgow and the Clyde Valley Housing Need and Demand Assessment's* timeframe, to 2025. With no requirement for strategic release, it would be inappropriate and without precedent to release such a scale of land in such a location for what is, effectively, an unrealistic view of future housing demand.

As the proposed development currently stands, extending over an area at Old Hall considerably more extensive than that which could be appropriate to contribute to any affordable housing provision for Kilmacolm, it is recommended no modifications be made in relation to this objection to the omission of the Old Hall site, Kilmacolm.

Reporter's conclusions:

--

Reporter's recommendations:

--

smaller accommodation closer to facilities, which the 'plots' is ideally placed to meet, as indicated by the stated desire of 2 of the owners to move there if they were released for development.

The effectiveness of sites is critical to the deliverability of the land supply and a range of sites require to be provided if the aims and objectives of the LDP are to be achieved. A number of recent examinations for other authorities have concluded that additional short term sites are required to augment the land supply, to deliver a 5 year supply and deliver land in the short term. The 'Plots' site is considered to be effective in terms of Government advice in PAN 2/2010 and is a more appropriate location for release than the former Quarry site on Port Glasgow Road (r64). Each Suggested Development Site in the MIR was assessed against a set of criteria to establish their suitability for inclusion in the Proposed Plan, the 'Plots' site satisfies all these criteria.

The co-owners have indicated that, if successful, they intend to construct houses individually or through the sale of the site to a small house builder and these houses would be compatible with the character and amenity of the area in terms of Policy RES1. An attached photo montage shows how the development would fit comfortably within the street scene.

Support Policy RES3, but object to the lack of reference in Schedule 6.1 to the 'Plots' site for self build plots and accordingly seek its inclusion along with an amendment to the Proposals Map to show the site as a residential development opportunity, cross-referenced to Schedule 6.1.

Against the inclusion of the 'Plots' site as a residential development opportunity

Dr Tom Fyfe (79)

Glad to note the Council has maintained the current Green Belt edge along Port Glasgow Road. Release of any of the plots would create a dangerous precedent with a risk of ribbon development all the way up Port Glasgow Road, as all the houses on the east side of the road have plots on the west side that could be released.

In favour of the current Green Belt boundary at Kilmacolm

Alan Connell (3)	Friends of Milton Woods (Bryon Evans) (17)	Friends of Milton Woods (Isobel Evans) (38)
Ann Ferris (11)	David Walker (27)	Lynda Connell (52)
Friends of Milton Wood (Archibald Brown) (12)	Friends of Milton Wood (Donna Pickett) (30)	Ralph Leishman (62) Rosemary Biggart (65)
Billy Pickett (14)	Graham Biggart (32)	Susan Biggart (76)

All of the above submitted support for the retention of the current Green Belt boundary of Kilmacolm and Quarrier' Village, to ensure the nature of the area whilst protecting the heritage and feel of the villages. It is inferred therefore that these representations are against any release of the 'Plots' site.

Modifications sought by those submitting representations:

Cllr David Wilson (28)

Add 'Plots' site, Port Glasgow Road to the land supply.

Mr Kenneth Davie, on behalf of 6 owners of 'the Plots' (49)

The inclusion of the 'Plots' site in Schedule 6.1, along with an amendment to the Proposals Map to show the site as a residential development opportunity, cross-referenced to Schedule 6.1.

Alan Connell (3)	Friends of Milton Woods (Bryon Evans) (17)	Friends of Milton Woods (Isobel Evans) (38)
Ann Ferris (11)	David Walker (27)	Lynda Connell (52)
Friends of Milton Wood (Archibald Brown) (12)	Friends of Milton Wood (Donna Pickett) (30)	Ralph Leishman (62)
Billy Pickett (14)	Graham Biggart (32)	Rosemary Biggart (65)
		Susan Biggart (76)
		Dr Tom Fyfe (79)

All of the above named individuals, request no modification.

Summary of responses (including reasons) by planning authority:

The response to this objection to the LDP by Mr Kenneth Davie on behalf of 6 owners of the 'Plots' site is informed by the planning history of the site, including the LPI in 2004 and a recent planning application for the erection of a bungalow by Mr & Mrs Hammond (refused in February 2010). The following Background Reports are of relevance:

- * Planning Applications and Council decisions on the site (2009/10)
- * LPI 2004

Note: *it is still to be confirmed if the representation on behalf of the 6 co-owners relates to the owners covering all 8 original plots.*

Cllr David Wilson (28)

It is not intended to include the 'Plots' site as a residential development opportunity in the Local Development Plan, for the reasons outlined below.

Mr Kenneth Davie on behalf of 6 owners of the 'Plots' (49)

A review of a development plan provides an opportunity to give consideration to the current circumstances and opinions relating to each site submitted for development, with the decision being taken not always consistent with previous decisions. In some instances the decision taken has been a marginal one, where a case can be made for both the development of a site and its retention in the Green Belt.

In this instance, it is acknowledged that the proposed policy for the 'Plots' site,

retaining its Green Belt status, differs from that of the Council's planning officials some 10 years ago. However, the settled view of the Council for this LDP remains consistent with the Council's decision taken in advance of the Local Plan Inquiry in 2004, to retain the 'Plots' site in the Green Belt and this position was upheld by the Reporter at the LPI, recommending that the 'Plots' remain in the Green Belt.

Given the above, the circumstances under which the Council's planning officials recommended the removal of the 'Plots' from the Green Belt and identified it as a housing site 10 years ago, is not particularly relevant to the current proposal.

The representation to remove the 'Plots' site from the Green Belt and identify it as a residential development opportunity (in Schedule 6.1(b) of the LDP), places considerable emphasis on claiming to represent all the owners of the 'Plots', and this is something that will be confirmed through a title search (*details to follow*). Reflecting on what would be required of the owners (and most likely all of them), to secure a successful quality development at this sensitive location, it is highly unlikely that the proposal submitted could be achieved without the agreement of all owners. It is therefore unlikely that a development could be done in such a way that would enhance the site and justify the removal of this singularly attractive 'gap' on the west side of Port Glasgow Road. It would not therefore be considered an effective site in terms of PAN 2/2010, due to this issue of ownership.

Having undertaken a Green Belt review for the preparation of the LDP (refer to Background Report), it was concluded that this site does perform a particularly valuable role in its current open condition. It allows the presence of the wider green wedge to be viewed from the road, in addition to that stretch of Port Glasgow Road further north towards the entrance of Kilmacolm, so that the countryside and 'rural feel' that penetrates into Kilmacolm is enhanced greatly at this location, by having this 'gap' in the built-up west side of the road.

The *Glasgow and the Clyde Valley Housing Need and Demand Assessment* (GCV HNDA), June 2011 did conclude that there is a small requirement for homes suitable to house elderly +60 years age households (refer **Issue 6**), but that 'housing need' need not be accommodated within the settlement of Kilmacolm, rather the appropriate market geography is either the Renfrewshire SHMA or the rest of Inverclyde, depending on the housing provider and tenure of provision. Given the site is in the form of individual plots in separate ownerships, it is not well-suited to provide a site to meet wider housing needs, as it is unlikely that it could be developed as one, to contribute to meeting such a need. Without a clear indication that the whole site, including the agreement of all the plot owners, can be brought together as one development opportunity and built-out as one, there is no case to be made that this site could contribute to meeting the assessed housing requirements in any meaningful way.

As the name suggests, the site could be developed as individual plots, but the likelihood of that being able to be done on a consistent design/architectural manner is remote, and so any development on this basis is likely not only to be undertaken over a relatively long period but also by virtue of such a time-lag, would also likely have an adverse impact on the landscape setting of this part of Kilmacolm.

As indicated above, decisions on such sites are often finely balanced and this is the case once again with this submission. However, the determining factor in this case is the importance of retaining the open gap at this location at the entrance to Kilmacolm. A secondary factor is the absence of a firm commitment that the site does have the agreement of all its respective plot owners to its development for housing. In the absence of this agreement across all owners and the view that that would undermine the prospect of a quality, integrated development, the Council retains its current position, that Kilmacolm is best served by retaining the 'Plots' site in the Green Belt.

Reporter's conclusions:

Reporter's recommendations:

Issue 9(.4)	Housing Sites Not Included in the Proposed Plan: Valley View Farm, Dougliehill Road, by Port Glasgow	
Development plan reference:	Chapter 6, Policy RES3, Schedule 6.1(a) and Policy RES7	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Mr & Mrs Crighton (45)		
Provision of the development plan to which the issue relates:	Objection to the omission of housing development opportunity at Valley View Farm, Dougliehill Road, by Port Glasgow	
Planning authority's summary of the representation(s):		
<p><u>Mr & Mrs Crighton</u> (45)</p> <p>Objection relates to a vacant and derelict brownfield site on the site of the Dougliehill Waterworks to the south of Port Glasgow.</p> <p>The objectors are seeking the removal of the site from the Green Belt and identification as a residential development opportunity in the Plan to allow them to gain planning permission for a small housing development in their grounds, and/or the clarification/amendment of the LDP policies so that such an application would be in accord with policy. Feel that the development is already in accord with policy, but if the Council disagree, suggest amendments to Policies RES7 and RES2.</p> <p>The site is in the Green Belt, close to but detached from Port Glasgow, and has been a waterworks since the 19th century. More recently, the tank reservoir was moved, and its former site and associated buildings are now occupied by the objector's houses. The remainder of the site was used as a poultry farm and egg production unit by the objectors, but this business failed leaving the site with a poor appearance that detracts from the amenities of the Green Belt. The Scottish Agricultural College has since concluded such as business is not viable on the site, nor is it suitable for agriculture. It is also too large to be a garden for the objectors. The site is on the Council's Contamination Register⁽¹⁾ and meets the definition of derelict land in the current local plan.</p> <p>The proposal is for infill development between these houses and the new tank that will form a group with the existing buildings and fit into the landscape. It has been designed in line with the Council's Design Guidance for Rural Housing and the new PAAN on New Houses in the Countryside. The proposed development will clear up the derelict appearance and, with peripheral planting, will provide a benefit to the amenity of the surrounding Green Belt while not being very visible from outside the site and not visible at all from the Port Glasgow Riverside.</p> <p>Do not agree with the analysis of the site in the SEA accompanying the MIR. The</p>		

site is largely contained and not visible in the main from outwith the site (although the existing houses is visible from the riverside); it is not subject to flooding (report attached); the site is brownfield with no conservation interest, therefore there is no impact on flora and fauna⁽²⁾.

Agree the proposed housing will be positive for population and human health and that sympathetic development and landscaping will make it acceptable. The number of houses that can be accommodated on the site is limited by Dougliehill Road and a bus service is available within a 14 minute walk. The negative impacts identified have not stopped sites being allocated for housing elsewhere.

Recognise that, as per SPP, brownfield land in the Green Belt is not always acceptable for development, however both the draft and current SPPs state that brownfield development is preferable to greenfield in both urban and rural settings. SPP also states that the supply of housing land should be generous and provide choice, encourages small scale housing in rural areas, and directs local authorities to apply 'proportionate' standards to access roads in order to enable small developments. Similarly, the draft SPP and NPF both encourage the redevelopment or reuse of derelict and vacant land⁽³⁾.

Guidance contained in the Coalition Government's NPPF on brownfield development in the Green Belt, along with a supporting statement from the Secretary of State, is referenced⁽⁴⁾. Examples of Scottish appeals where development was allowed on brownfield sites in the Green Belt are also attached.

The SDP encourages the re-use of brownfield land in the Clyde Corridor, including Inverclyde⁽⁵⁾, and Schedule 10 identifies a shortfall of affordable housing in Inverclyde⁽⁶⁾.

The Adopted Local Plan identifies the large amount of derelict land as a major weakness for Inverclyde. While paragraph 3.33 states that unnecessary development in the Green Belt should be prevented, this implies that necessary development is acceptable. This development is necessary in that it will provide a desirable planning outcome by improving the appearance of the former waterworks and remedying the dereliction⁽⁷⁾. Policy DS9 identifies degraded urban fringe land in the Green Belt, like the representation site, as a problem and recommends 'greening'⁽⁸⁾. The implementation of this policy will require cross-subsidy from development, such as that proposed.

The Proposed Plan aims to provide a good range, choice and distribution of housing sites, mostly in sustainable brownfield locations and is also supportive of small groups of houses in the Green Belt (paragraph 6.19). Policy RES7 seems to support small groups of dwellings in the Green Belt but this is not clear due to the way the policy is written. It would be helpful if the word or after "...dwellings not adjoining the urban area" were made bold in order to distinguish between small groups of dwellings and the redevelopment of large redundant buildings⁽⁹⁾.

Recommend a further addition to make it clearer when small groups of dwellings on brownfield land in the Green Belt will be acceptable. This is a development of H4 and H17 in the Adopted Plan and its effect will be limited by the small amount of brownfield land available within the Green Belt. Policy H4 refers to the re-use or

redevelopment of large redundant institutions in the Greenbelt and Countryside, but as there are few such institutions, this must include former waterworks⁽¹⁰⁾.

Policy ENV2 also refers to development in the Green Belt. The representation site would be compatible with this policy and RES7 with the proposed clarifications. There would also be consequential changes to other policies e.g. RES2, where it would need to be made clear that it applies to all brownfield land and RES7 and ENV2 should be cross-referred at the end to make clear that brownfield development is supported subject to the criteria in these policies. A similar amendment is required for SDS5⁽¹¹⁾.

Modifications sought by those submitting representations:

Site and surrounding development taken out of the Green Belt and identified as a residential development opportunity, or

changes to **Policy RES7** to read:

“Small groups of dwellings on brownfield land in the Green Belt will be acceptable provided that –

- (a) The proposal does not detract from the openness of the Green Belt
- (b) The proposal serves the purposes of the Green Belt by bringing a net benefit by, for example, clearing up dereliction and/or improving the appearance of a site.

Development of new dwellings within the Countryside will be supported if the proposal is for the redevelopment of large habitable redundant buildings...” and

Changes to **Policy RES2** to read:

“Development on brownfield sites for housing and community use, will be supported where it accords with Policy RES1 and RES5, except where:

- (a) an alternative use of greater priority or significant social and/or economic/employment benefit is identified; or
- (b) an alternative use is identified through an agreed area renewal initiative (refer Policy SDS7); or
- (c) it would result in an unacceptable loss of designated and locally valued open space (refer Policy ENV4)

Proposals should also accord with Policies RES7 and ENV2...” and

Amend **Policy SDS5**, which is narrowly concerned with brownfield land within urban settlements.

Summary of responses (including reasons) by planning authority:

The response to this objection to the LDP by Mr and Mrs Crighton is informed by the planning history of the site, including the most recent planning application for residential development at Valley View Farm, Dougliehill Road, by Port Glasgow (. The following Background Reports are of relevance:

* Council Planning decisions: *details to be included*

Taking each of the substantive points in turn.

(1) There are currently no sites on the 'Inverclyde Register for Determined Contaminated Land Sites'.

(2) The SEA analysis identifying potential flooding issues was based on advice from the Council's Roads Service, who is responsible for flooding within Inverclyde. The assessment of impact on the landscape is based on the visibility of the current house from the Inverclyde waterfront, where it is highly visible for continuous stretches along the A8 trunk road, when travelling from Greenock east into Port Glasgow. As stated, all sites that were previously undeveloped or fall within the Green Belt were assessed as having a negative impact on biodiversity, flora and fauna even where they are not covered by an environmental designation, as they are more likely to be used as a habitat or corridor by wildlife.

(3) Responding to the claim the site is 'rural brownfield' and the use of SPP to make a case for its development for housing, SPP guidance on location and design of new development states that:

- (a) development should be directed to sites within existing settlements where possible;
- (b) sites should contribute to the Spatial Strategy and policies of the development plan; and
- (c) be relatively accessible.

This site meets none of these criteria. The rural development section of SPP is not relevant as it is concerned with settlements detached from the urban area and its aim is to maintain the viability of communities and support rural businesses. This site does not qualify as rural in the terms of this section of SPP as the relevant nearest community is urban Port Glasgow, the site being only slightly detached from the edge of this settlement. Curiously, the submission also identifies the site as 'urban fringe', which is an accurate description.

(4) It is maintained that planning legislation from other parts of the country is superfluous in relation to this objection and is not relevant.

(5) The *Glasgow and the Clyde Valley Strategic Development Plan's* (GCV SDP) support of brownfield development is supported by Inverclyde Council in its sustainable spatial strategy of the LDP. The spatial strategy makes clear the preference for all appropriate development to be on brownfield land within the built-up area of the defined settlements of the authority, and that a number of key locations – the MAC policy areas, of which a number are in the strategic 'Clyde Corridor' – are also defined in the LDP's spatial strategy. Under no logical reading of this strategy could the objection site be included.

(6) The reference to the *GCV SDP's* Schedule 10 and the need for affordable housing is not relevant, as there is no suggestion in the submission that the housing development proposed is for anything other than for private sale. Moreover, the location of the site on the urban fringe would be unsuited for most households seeking an affordable home.

(7) The development proposed is not necessary either for the stated purpose of 'tidying a large garden', as it is not the purpose of planning to permit development for this reason. It is perfectly possible to improve the appearance of the site without the development proposed and through related environmental improvements. It is suggested that it is entirely in the interests of the owner's own residential amenity to remove surplus buildings and structures associated with the former poultry business, without requiring assistance for formal landscaping.

(8) Reference to Policy DS9 in the adopted Local Plan is not relevant as it recommends greening and access initiatives to be taken forward by the Lower Clyde Greenspace partnership, the Joint Authority for the Clyde Muirshiel Regional Park and the Inverclyde Access Strategy. Moreover, it states in the supporting text (paragraph 4.25) that those initiatives that have been carried out, and new ones, are expected to be done in such a way as to have the 'additional benefit of focusing development activity on existing urban areas, thereby assisting urban regeneration and protecting the Green Belt from unwarranted development.' This clearly indicates that this policy is not designed to promote development in the Green Belt in order to 'enable' greening to take place for its own sake.

(9) The representation site is not a sustainable brownfield location. It is not accessible by a range of means of transport and it is not within easy reach of local facilities. However, paragraph 6.48 of the Proposed Plan recognises there may be exceptional circumstances where a departure from the general principle against new housing development outwith the settlement boundaries could be appropriate for small land releases, and these would be assessed through Policy RES7.

(10) Reference is made to policies H4 and H17 of the adopted Local Plan, commenting that Policy RES7 is a development of these policies. This is correct however, Policy H17 (and paragraph 7.101 of the adopted Local Plan) clearly states that this policy applies to large institutions and other buildings in the Green Belt such as schools, hospitals and hotels. Many of these buildings have been redeveloped and converted since the adopted Local Plan was published so there are now few such institutions remaining in the Green Belt. This does not mean that other former uses in the Green Belt and Countryside, such as necessary infrastructure including waterworks, should now be considered under this policy, or its proposed equivalent, Policy RES7. There is clearly a distinction to be drawn between utilities infrastructure that had/have a locational requirement to be sited in specific locations, and former large residential and other institutions, which generally had/have built structures with the potential for refurbishment and conversion to new uses, including residential.

(11) It is considered that policies RES2 and RES7 are perfectly clear and unambiguous, and similarly Policy SDS5, which is clear in its intention in being an authority-wide, 'strategic' statement, without need for any qualification.

Recommend no modifications be made under these representations.

Reporter's conclusions:

Reporter's recommendations:

Issue 9(.5)	Housing Sites Not Included in the Proposed Plan: Urban Sites: Dunvegan Avenue, Gourock Barr's Brae, Port Glasgow Gillburn Road, Kilmacolm Former Kilmacolm Institute, The Cross, Kilmacolm	
Development plan reference:	Chapter 6, Policy RES3 (Residential Development Opportunities), Schedule 6.1	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Mr Shaun Law (16) Ms Catherine Harbon (19) Mr David Eagle (24) Mr John Watson (46) Ms Katrin Eagle (48) Mr Timoney (59) Kilmacolm Civic Trust (63) Kilmacolm Community Council (71)</p>		
Provision of the development plan to which the issue relates:	Housing sites not included in the Plan at: Dunvegan Avenue, Gourock Barr's Brae, Port Glasgow Gillburn Road, Kilmacolm Former Kilmacolm Institute, The Cross, Kilmacolm	
Planning authority's summary of the representation(s):		
<p>Dunvegan Avenue, Gourock Mr Shaun Law (16)</p> <p>The site is currently a vacant area of ground in Dunvegan Avenue, Gourock. The site has been refused planning permission in principle twice in the past four years, once for three dwellings and once for two, and both on the basis that the loss of open space would be detrimental to the area. The site was originally proposed as an area of public open space when the houses were constructed in 1977, although no details were submitted, nor conditioned. The site has never been laid out as an area of open space, nor was a maintenance or management agreement sought by the Council. It is understood that Inverclyde Council cut the grass on this land until recently, but that practice has now ceased.</p> <p>The site provides no useful value to the community, having no play facilities and not being maintained. Since acquiring the site in 2009, the owner has been served a notice by the Council requiring the proper maintenance of the land. The retention of this site as public open space is an anomaly on the part of the Planning Authority, and the public have no legal rights to enter onto the land. It is therefore absurd for the Planning Authority to indicate that the site cannot be developed as it "would remove an area where children can play safely".</p> <p>Barr's Brae, Port Glasgow</p>		

Mr Timoney (59)

The site has been the subject of two separate planning applications, the first dismissed at appeal in February 2012, and the second currently subject to a local review by the Council.

The site is considered to be an effective housing site and should be included as a housing allocation in the LDP. The reasons for the dismissal of the appeal on this site in February 2012, have been addressed by the most recent scheme through the reduction of the visual impact, and represents a materially different scheme to the one considered by the reporter. However the application was still refused planning permission on the basis of the loss of an area of open space and the perceived adverse visual impact the proposed development might have on a SUSTRANS cycle way. The planning case officer was satisfied by all other technical matters.

The attached Planning Statement (reference ??) explains the background, context and concept of the proposal. The 14 dwellings shown on the application are indicative only, as is the number of storeys.

The land is defined as open space, but not used as such. It is unmanaged scrubland with little or no amenity interest. The owner is willing to give ownership of the area adjoining Dougliehill Terrace to the residents for communal open space or private rear gardens, in addition to providing a financial contribution for future management.

It is accepted that the new development will be visible from the cycle way, but is doubtful whether users will consider that their experience has been significantly impaired. The impact for cyclists will be limited, and walkers will have a view filtered by retained landscape.

The site is considered to be effective in relation to the seven requirements set out in the PAN on Affordable Housing and Housing Land Audits (2/2010). There is market interest in this site, and development could be delivered in the near future assisting Inverclyde to meet its five year housing land requirement.

Gillburn Road, Kilmacolm

Kilmacolm Civic Trust (63)

The plot of land at the intersection of Moss Lane and Gillburn Road would be an ideal site for meeting the affordable housing requirement for small households of 35 years plus and 60 years plus (for downsizing).

Former Kilmacolm Institute, The Cross, Kilmacolm

Ms Catherine Harbon (19)

Mr David Eagle (24)

Mr John Watson (46)

Ms Katrin Eagle (48)

Kilmacolm Community Council (71)

The old institute building on the corner of Lochwinnoch Road and Port Glasgow

Road has been omitted from the LDP. It was owned by Inverclyde Council, sold to a developer and 10/11 dwellings are expected to be developed. The timing and precise form of the redevelopment remains uncertain, but it should be taken into consideration, as it accounts for a major proportion of the suggested housing – proposed number of dwellings in the Renfrewshire SHM over the duration of the LDP is 120. Ensuring that this proposed development includes affordable housing would eliminate the need for greenbelt release.

Although the site is relatively small, the HLS Audit, paragraph 7 (reference??) refers to the different approach taken for small sites in Kilmacolm and Quarriers Village due to each site, however small, being of greater significance in these settlements.

Modifications sought by those submitting representations:

Dunvegan Avenue, Gourock

Mr Shaun Law (16)

The area of ground at Dunvegan Avenue, Gourock should be included within Policy RES3 as a Residential Development Opportunity and included in Schedule 6.1 as a site to provide two residential units.

Barr's Brae, Port Glasgow

Mr Timoney (59)

The site should be included as a housing allocation in the LDP.

Gillburn Road, Kilmacolm

Kilmacolm Civic Trust (63)

This site should be added to the Plan.

Former Kilmacolm Institute, The Cross, Kilmacolm

Ms Catherine Harbon (19)

Mr David Eagle (24)

Mr John Watson (46)

Ms Katrin Eagle (48)

Kilmacolm Community Council (71)

The housing stock should be reviewed and the site should be counted and scored against the total of 120 new dwellings in the HLS.

Summary of responses (including reasons) by planning authority:

Dunvegan Avenue, Gourock

Mr Shaun Law (16)

Background – a planning application for 1 house was refused planning permission in September 2000, an outline application for 3 houses was refused in March 2009 and an application in principle was refused for 2 houses in November 2010.

- the capacity of the site is at a low level and would not normally be incorporated into the list of residential development opportunities identified in Schedule 6.1
- the site is within a residential policy area in the LDP, being covered by Policy RES1 (Safeguarding the Character and Amenity of Residential Areas). The principle of housing on the site is therefore acceptable, subject to the criteria laid out in the policy, including the compatibility with the

character and amenity of the area

- consideration of appropriate development on the site should be addressed at the planning application stage

Barr's Brae, Port Glasgow

Background – planning permission in principle was refused in October 2011 and dismissed on appeal in February 2012. Another application was refused in October 2012 and dismissed at the Local Review Body in August 2013.

Mr Timoney (59)

- the most recent planning decision was upheld at the LRB meeting of 7 August 2013
- the site has been identified as open space in the LDP following an open space review/audit
- the two recent planning decisions were upheld by appeals – nothing has changed to alter decisions
- amenity and visual case

Gillburn Road, Kilmacolm

Kilmacolm Civic Trust (63)

- the site has not been submitted to the Council by its owner or an interested developer as a site to be included as a Residential Opportunity site in the Plan
- the site is included within policy RES1 (Safeguarding the Character and Amenity of Residential Areas) and could be developed for housing purposes

Former Kilmacolm Institute, The Cross, Kilmacolm

Ms Catherine Harbon (19)

Mr David Eagle (24)

Mr John Watson (46)

Ms Katrin Eagle (48)

Kilmacolm Community Council (71)

Background – Inverclyde Council site which has been marketed. (Update needed)

- site is a town centre site which has been market unsuccessfully in the past – no certainty that the site would be developed for residential purposes in the plan period
- site should be considered as windfall, however if Reporter is so minded, this could be included in Schedule 6.1

In conclusion, the Council does not propose to include the sites at Dunvegan Avenue, Gourrock, Barr's Brae, Port Glasgow, Gillburn Road, Kilmacolm and the Former Kilmacolm Institute, The Cross, Kilmacolm in Schedule 6.1 of the LDP.

Reporter's conclusions:

Reporter's recommendations:

Issue 10	Town Centre Policy	
Development plan reference:	Greenock Town Centre boundary (paragraph 7.17, Proposals Map C) Subdivision of Greenock Town Centre (Policies TCR1 & TCR5) The sequential approach (Policies TCR2 & TCR6) Retail floorspace supply and development opportunities (Schedule 7.1) Retail Policy (Policy TCR7, paragraph 7.33, Policy TCR8)	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Asda Stores Limited (2) Clydeport Operations Limited (25) Gallagher Developments (18) Aldi Stores Ltd. (72)		
Provision of the development plan to which the issue relates:	Town Centres and Retailing	
Planning authority's summary of the representation(s):		
<p>Greenock Town Centre Boundaries</p> <p><u>Asda Stores Limited (2)</u></p> <p>Policy TCR1 shows Greenock Town Centre, including the Central and Outer Areas, as the strategic priority at the top of the hierarchy of centres. The identification of sub-divisions within Greenock Town Centre and the restriction of uses that might be acceptable in them are contrary to Scottish Planning Policy and its overall aims and objectives. It is inappropriate for the Plan to contain policies that oppose legitimate town centre uses in certain sub-divisions of a strategic town centre, particularly for Policy TCR5 to specifically exclude Class 1 retail use from any part of Greenock Outer Area. This is inconsistent with Scottish Planning Policy and the policy of the Strategic Development Plan.</p> <p><u>Clydeport Operations Limited (25)</u></p> <p>The extension of Greenock Town Centre boundary is sought to include the residential development opportunity site r37, and for this site to be designated for mixed use including residential, commercial and a major element of retail, to promote and encourage investment and development in a similar approach to the extension at Port Glasgow Town Centre. The site was identified within Greenock</p>		

town centre as a residential development site within an Outer Mixed/Commercial Area in the existing Inverclyde Local Plan (adopted 2006).

The site is a key location in close proximity to Greenock Ocean Terminal, where 40 cruise ships are scheduled to visit in 2013 bringing a large number of tourists to Greenock. Given the prevailing economic and market conditions, a flexible approach to development must be adopted to encourage development to come forward at the earliest opportunity and return a disused former industrial site to an active and beneficial use, enhancing the local area and resulting in environmental improvements helping create a destination welcoming to tourists and residents.

The sequential approach

Asda Stores Limited (2)

The proposed Plan fails to adequately reflect the identification of the whole of Greenock Town Centre as a Strategic Centre in the Strategic Development Plan and Policy TCR2 does not properly reflect the sequential approach as set out in Scottish Planning Policy. There is no sound basis for identifying Greenock Central Area as the preferred location for retail development while relegating Greenock Outer Area to third place. This splitting of the town centre can be seen to undermine Greenock Town Centre's strategic role. National and strategic policy indicate major retail developments are appropriate first and foremost in or on the edge of strategic centres, it is therefore illogical for TCR2 to indicate that such development should take place in Gourock or Port Glasgow Town Centres ahead of the Outer Area of Greenock Town Centre.

Gallagher Developments (18)

Policy TCR2 is not consistent with draft national policy contained in Scottish Planning Policy. TCR2 states that priority should first be given to sites in Greenock Central Area with the effect that any development proposals in Port Glasgow Town Centre would need to be accompanied by a sequential site assessment demonstrating there are no available or suitable sites in Greenock Central Area. The draft SPP does not seek to distinguish between the levels of centres in applying the sequential approach and there is not requirement for development proposals within town centres to be assessed against the sequential approach.

To avoid inconsistency with draft Scottish Planning Policy while continuing to ensure the current role of Greenock Town Centre and other existing centres are protected, TCR2 should be amended to define Port Glasgow and Gourock Town Centres within the same category as Greenock Central Area for the purposes of the application of the sequential approach and TCR6 should be amended to ensure the role of the centres within Inverclyde are not undermined.

Retail floorspace supply and Schedule 7.1

Asda Stores Limited (2)

None of the sites identified within Greenock Town Centre in Schedule 7.1 are

suitable or available for major retail development. Part of the Ker Street town centre/retail opportunity site (tc1) has been granted planning permission for a small foodstore and is no longer available and even if it is not developed it is not an appropriate site for major development, and the Port Glasgow Waterfront (West) town centre/retail opportunity site (tc7) has planning permission which is now being implemented so scope for alternative retail development on the balance of the site is limited. Representations have been made to the Council in the recent past to the effect that there are qualitative and quantitative deficiencies in the supply of retail floorspace and a requirement for a further superstore to stimulate competition and increase consumer choice in line with Scottish Government Policy.

Aldi Stores Ltd. (72)

It is requested that the note accompanying site 'tc1' in Schedule 7.1 is amended to reflect the fact that planning permission has now been granted for a store.

Retail Policy

Asda Stores Limited (2)

Criteria (g) of Policy TCR7, requires evidence that no "appropriate" sequentially preferable site exists. This wording does not adequately reflect the provisions of Scottish Planning Policy, which requires that "sequential preferable options have been assessed and discounted as unsuitable or unavailable".

Criteria (h) of Policy TCR7 requires evidence of capacity for the development in terms of expenditure compared to turnover in the appropriate catchment, however there is no requirement for this in Scottish Planning Policy, which states that development should be of an appropriate scale.

Paragraph 7.33 indicates that conditions will be used to control certain new retail developments outwith designated town centres, including sub-units within large foodstores, however the Local Development Plan sets out no evidence to justify the use of such conditions. There is no sound planning basis for suggesting that the lack of restrictions on net floorspace or the type of goods sold will lead to adverse effects on the vitality and viability of town centres.

While the text accompanying Policy TCR8 says restrictions 'may' apply, there is no such flexibility in the policy itself.

Modifications sought by those submitting representations:

Greenock Town Centre Boundaries

Asda Stores Limited (2)

Amend Policy TCR5 to include use class 1 (shops) in each of the sub areas.

Clydeport Operations Limited (25)

Seek the extension of Greenock Town Centre boundary so as to include the site identified as residential development opportunity site r37 at 32 Union Street, Greenock and for this site to be designated for mixed use including residential, commercial and a major element of retail.

The sequential approach

Asda Stores Limited (2)

Amend Policy TCR2 to show the Outer Area of Greenock Town Centre as the second preference in the sequential approach.

Gallagher Developments (18)

Amend Policy TCR2 to define Port Glasgow and Gourock Town Centres within the same category as Greenock Central Area for the purposes of the application of the sequential approach.

Amend Policy TCR6 to read “The development of town centre uses on the sites included in Schedule 7.1 and as identified on the Proposals Map, will be encouraged and supported provided that the proposals would not undermine the role of Greenock Town Centre or any other existing centres in the retail hierarchy”

Retail floorspace supply and Schedule 7.1

Asda Stores Limited (2)

Identify an appropriate location for major convenience retail development.

Aldi Stores Ltd. (72)

Reword note accompanying site ‘tc1’ in Schedule 7.1 to read: ‘vacant site and former industrial building with planning permission for Class 1 convenience retail.’

Retail Policy

Asda Stores Limited (2)

Change wording of Policy TCR7 criteria (g) to include the words “suitable and available” after “appropriate”.

Change criteria (h) of Policy TCR7 by deleting existing wording and replacing with “that the scale of development proposed is appropriate”.

Change wording of Policy TCR8 to state that planning conditions “where appropriate may” to imposed rather than “will” be imposed.

Delete criteria (a), (d) and (e) of Policy TCR8.

Summary of responses (including reasons) by planning authority:

Background – a planning application was received in October 2013 from Clydeport Operations Limited for the erection of a supermarket, associated car parking, access roads and landscaping in principle on a site in Brougham Street, Greenock.

Greenock Town Centre Boundaries and The Sequential Approach

Asda Stores Limited (2)

Clydeport Operations Limited (25)

The boundary of Greenock Town Centre was reviewed as part of the preparation for the LDP. This was undertaken through a land use survey of the Outer/Mixed Commercial Area designated in the adopted Local Plan (2005), to determine the extent to which land use and floorspace had changed over the 10 years, from 2002 to 2012. This survey showed, among other findings, that the amount of Use Class 1 retail floorspace had more than halved between 2006 and 2012 within the West End sub division, from 3,500 to 1,600 square metres, and during this time Use Classes 2 and 3 had also dropped significantly. The ‘town centre uses’ that remain are predominantly small scale and it was concluded these could be considered under Policy RES10 dealing with ‘shops to meet local needs’.

Taking this evidence into account, and mindful of the need to re-focus the predominant uses that stimulate footfall and linked trips, and therefore add most to the vitality and viability of a town centre, it was concluded that both the Central Shopping Area and the Outer/Mixed Area boundaries be amended in several ways. One of these changes (using the evidence from the land use survey) included the exclusion from the Town Centre of a large, predominantly residential area covering the inner West End beyond Nelson Street and Patrick Street. Apart from the Union Street Housing Opportunity site, the area also has very limited land available for new development that would not have an adverse impact on residential amenity. This change and the others made to Greenock Town Centre’s boundaries will serve to consolidate the Town Centre and better protect its sub regional status as well as its function as a Strategic Centre in Inverclyde and the Glasgow City Region.

Greenock Town Centre, Central Area is the first sequential choice, followed by Port Glasgow and Gourock Town Centres, and then by Greenock Town Centre, Outer Area. This sequential approach was adopted in order to protect and enhance the vitality and viability of Greenock as a Strategic Centre, whilst recognising the importance of Port Glasgow and Gourock Town Centres and the complementary role they have in providing access to services for their respective catchments. The Central Area of Greenock is first and foremost the foundation of the centre’s ‘strategic status.’ The Outer Area is sub-divided according to character and function where amenity considerations need to be taken into account. This means that although the Outer Area is appropriate for a range of town centre uses, including retail, they are not equally suitable in each division.

This approach and the other changes made between the adopted Local Plan and this Proposed LDP, are designed to safeguard and confirm the status of

Greenock while at the same time promoting complementarity between the centres, in particular the evolving enhanced role of an expanded Port Glasgow Town Centre. This planning policy framework should help make provision for a full range of retail formats within Inverclyde, help to retain local expenditure and provide sustainable access to retail, service and leisure uses for residents, while helping to better protect residential amenity in the area of transition immediately outwith the designated town centre of Greenock.

Asda Stores Limited (2)

Policy TCR5 encourages and supports certain uses in the sub-divisions of Greenock Town Centre, Outer Area. It does not exclude other uses, but seeks to encourage developments that are appropriate to the roles and functions of the different sub divisions of the Outer Area, while keeping with the character and amenity of each. It is through this policy that the Central Area will maintain its strategic town centre status, its vitality and viability and its primary function as the main area for retailing in Inverclyde.

SPP states that the role and function of centres can be specified and that integration with residential areas is important. This is one among a number of functions the Outer Area designation is designed to achieve. SPP also states that the development plan can identify exceptions to the sequential approach, as in Policy TCR2. SPP does not provide direction on the place of strategic centres in the sequential approach, and the *Glasgow and the Clyde Valley SDP* leaves it to the Councils through their LDPs to determine this matter based on their own local circumstances. In addition, the *Glasgow and the Clyde Valley SDP* does not preclude differentiating areas within a town centre. Doing so in Greenock should assist in fulfilling the SDP aim of safeguarding and developing its diverse functions (as a Strategic Centre) for the community, while helping to implement identified future actions for Greenock (Policy TCR12). Amending the sequential approach promotes the important complementary role Port Glasgow will have when fully developed alongside Greenock, in providing Inverclyde with a full range of retail formats for its residents.

The principle of having divisions within Greenock Town Centre in the Proposed LDP is carried over from the Adopted 2005 Local Plan and has been tested at appeal. It is not considered that this approach will undermine Greenock's strategic role in the future, and indeed is considered to have been successful in ensuring a low level of vacancies during the recent period of recession. The Central Area of Greenock remains the first location for town centre uses in Inverclyde. The Outer Area allows for some flexibility and a wider area where certain specified town centre uses are preferred, in locations that are easily accessible.

Gallagher Developments (18)

The development of policy for the LDP pre-dates the Scottish Government's Consultation Draft SPP 2013, the Proposed Plan's policies being based on SPP 2010, not on a draft policy document that may not be retained in its current form for the finalised version. SPP 2010 allows the development plan to make exceptions to the sequential approach, stating that proposals for 'town centre uses' within town centres do not need to be assessed against their impact on

similar uses within *that* centre. The LDP approach assesses such proposals against the primary centre, i.e. Greenock Central Area. This is not inconsistent with SPP.

The changes proposed to Policy TCR6 would only apply in specific locations and circumstances, whilst the proposed sequential approach is to have application to all retail and commercial leisure developments.

Clydeport Operations Limited (25)

Comparing the Union Street site with Port Glasgow Town Centre is misplaced. The extension to Port Glasgow Town Centre has been promoted by the Council in partnership with the site owner and developer since 1998. The development opportunity was first identified in the *Glasgow and the Clyde Valley Joint Structure Plan 2000*, following a Called-in Inquiry in that year, and carried forward through the allocation of a site in the adopted Inverclyde Local Plan 2005. The site's development has included the re-alignment of the A8 trunk road to accommodate its physical extension to the existing centre.

The purpose of the development was to address a retail capacity deficiency in Inverclyde. It was acknowledged that there was insufficient land to accommodate the scale of convenience and comparison retailing required within Greenock town centre and recognition that such a development could provide a major stimulus to the regeneration of Port Glasgow, while providing Inverclyde with a full range of retailing options in a new, suitable location. By locating this development on a site with a direct physical extension to the existing town centre, easily accessible from the trunk road network and remote from residential areas, it accorded with policy on a number of levels. Port Glasgow Town Centre (including the Waterfront (west) Area), has been, and will continue to be, promoted as a complementary centre to Greenock Town Centre, offering between them, when the former is fully developed, a full range of retail formats for the residents of Inverclyde.

None of the above is applicable to the Union Street site, which was promoted through the adopted Local Plan 2005 as a housing opportunity site and remains a good residential opportunity within a predominantly residential area, adjacent to Greenock West End Conservation Area.

Neither is the site on the 'tourist route', as people arriving at Ocean Terminal on the cruise ships, if walking into town, exit via Patrick Street and by Grey Place/West Blackhall Street, bypassing the Union Street site entirely. There is no reason to suggest that the addition of commercial development would alter this desire line into Greenock town centre.

Asda Stores Limited (2)

Clydeport Operations Limited (25)

Gallagher Developments (18)

Aldi Stores Ltd. (72)

To conclude, the Town Centres and Retailing Policies noted above provide a clear framework to guide development in a way that should protect Greenock Central Area and its strategic role as the primary location for town centre and

particularly, retail uses within Inverclyde. Representations submitted to change the policies would introduce an unnecessary level of interpretation and uncertainty.

No modifications recommended.

Retail floorspace supply and Schedule 7.1

Asda Stores Limited (2)

There is no requirement for new large scale comparison floorspace in Inverclyde according to the evidence base provided for the LDP through the Capacity Study (dated 2012) undertaken by the GCV SDPA team on behalf of the constituent local authorities. It has not been demonstrated in the submission that new major convenience floorspace is required, indeed Asda's recent proposal, despite extensive pre-application discussions by this retailer, was not submitted for planning permission. This indicates that there is considerable uncertainty on the part of this retailer and highly likely that there is no market for a new large scale convenience development. (The submission by Clydeport in October this year for a supermarket on the same, but smaller site, reaffirms that there is little interest for large scale comparison floorspace by the supermarket operators.) Therefore, there is no need to identify any new town centre/retail development opportunity sites in Schedule 7.1.

It is also worth mentioning the uncertain and inconsistent approach by this retailer to pursuing a large scale convenience store in Greenock, having not submitted any proposals at the Main Issues Report stage of Plan preparation, and in addition to the above withdrawal, stated at that time (early 2013), that such a store would no longer be viable.

Currently, there is approximately 10,000 sq.m. of vacant floorspace in the Central Area of Greenock Town Centre that could be utilised for convenience retailing.

The Scottish Government's economic strategy aims to promote competition but this is within the context of the published growth sectors, companies and markets, and small scale and domestic businesses, not retail provision. The Strategy states:

'The ability of our businesses to grow and be successful will depend upon: effective and efficient public services that promote competition and help businesses thrive'; (p38) and

'We are focussed on streamlining the public sector's dealings with business, removing the barriers to growth and adopting more efficient procurement practices that encourage competition.' (p87)

These aims and objectives, in terms of the contribution that development plans and this LDP can make to help achieve them, are dealt with in the Economy and Employment policies in Chapter 4. Competition in the sense presented in this submission is not a planning matter.

Aldi Stores Ltd. (72)

It is not considered necessary to change the wording in Schedule 7.1 relating to the Ker Street site. However, an alternative wording could be, if the Reporter were so minded to make a change, as follows:

‘Vacant site and former industrial buildings, part of which has planning permission for Class 1 convenience retail’, to reflect the fact that the planning permission does not cover the entire site designated ‘tc1’.

Retail Policy

Asda Stores Limited (2)

It is unnecessary to repeat the exact wording from SPP in the policy, and it is considered that the existing wording in the policy is satisfactory. However if the Reporter were so minded to change the wording in Policy TCR7 criterion (g), the recommended wording in the representation would be an acceptable alternative.

As well as being of an appropriate scale, SPP also states that where proposals support a centre’s role and function there is no requirement to provide a detailed assessment of need. Therefore, where a proposal does not support the role and functions of a centre (which out-of-centre proposals automatically do not), an assessment of need (i.e. capacity) is required. In paragraph 63 of SPP, the need for development to be of an appropriate scale is discussed, but this is only one of three criteria in the consideration of out-of-centre locations. The third criterion states that ‘there will be no significant adverse effect on the vitality and viability of existing centres’. An impact assessment, based on a capacity assessment would be required to demonstrate this and fulfil criteria (i) of TCR7.

The sequential approach applies to changes to developments that are of a scale or form sufficient to change a centre’s role and function, in order to protect the vitality and viability of the designated centres. Sub-units within existing stores may not require planning permission so the sequential approach would not be applied. In order to protect centres and ensure such developments are assessed in terms of their potential impact, conditions are appropriate to ensure that such changes are monitored and controlled.

There is no need to change the wording of Policy TCR8 or the preceding text. The text relates to how, generally, conditions may be appropriate under certain circumstances. The policy sets out the specific cases where conditions will be appropriate.

Reporter’s conclusions:

Reporter’s recommendations:

Issue 11	Local Centres and Neighbourhood Shops	
Development plan reference:	Local Centres (Policy TCR1) Shopping Facilities to meet local needs (Policy TCR10)	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Kelvinside Developments (Aberdeen) Limited (44)		
Provision of the development plan to which the issue relates:	Local Centres and Neighbourhood Shops	
Planning authority's summary of the representation(s):		
<p>Local Centres and Neighbourhood Shop</p> <p><u>Kelvinside Developments (Aberdeen) Limited (44)</u></p> <p>Object to only one of the two local centres identified in the Adopted Inverclyde Local Plan in Wemyss Bay being included in the Local Development Plan Proposed Plan Policy TCR1. No justification is given and given the facilities at each, it is difficult to see why one would be included but not the other, therefore either both should be included or neither.</p> <p>There is no justification for the inclusion of the figure of 250 square metres within Policy TCR10, it is an arbitrary figure with no credibility. It is not appropriate for the planning system to place such arbitrary restrictions on proposed local shops.</p>		
Modifications sought by those submitting representations:		
<p><u>Kelvinside Developments (Aberdeen) Limited (44)</u></p> <p>Change Policy TCR1 to either: include the Pier/Station, Wemyss Bay as a local centre or delete sub-section (i) Ardgowan Road, Wemyss Bay to have no local centres in Wemyss Bay.</p> <p>Change Policy TCR10 by deleting "up to 250 square metres gross" and replace with "appropriate in scale to the relevant local catchment area."</p>		
Summary of responses (including reasons) by planning authority:		

Local Centres and Neighbourhood Shop

Kelvinside Developments (Aberdeen) Limited (44)

The Pierhead local centre was removed from the plan as it was felt to cater primarily for people using the station and pier and not the local population, as half of the units in the centre are within the station building. Therefore, it does not merit designation as a local centre, there being very few local households. The centre at Ardgowan Road is a purpose built centre with the adjoining community facilities and dedicated parking and is centrally located within Wemyss Bay. Another local centre is also proposed as part of the redevelopment of the Inverkip Power Station site to serve the new residential population there, as well as the existing population in Wemyss Bay.

The 250 square metres is based on the assessment of out of centre shops. There are 164 units classified as 'shops' outwith the designated centres as at March 2013 (from Valuation Roll, includes e.g. hot food takeaways), with an average size of 148 square metres. Only 5 units are over 250 square metres and these include Cardwell Garden Centre and Nursery and LIDL in Port Glasgow. All existing units of the scale proposed are found within Greenock and Port Glasgow town centres with the exception of the Sainsbury's Local in Inverkip local centre. The 250 square metres therefore reflects this scale, but allows considerable flexibility and provides continuity with the adopted plan.

It is not therefore proposed to change the LDP.

Reporter's conclusions:

Reporter's recommendations:

Issue 12	Environmental Designations	
Development plan reference:	Chapter 8, p.65 Policy ENV1 (b) (i) Designated Environmental Resources	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Inverclyde Renewables LLP(22)		
Provision of the development plan to which the issue relates:	The weight given to strategic and local environmental designations	
Planning authority's summary of the representation(s):		
<p><u>Policy ENV1</u></p> <p>Inverclyde Renewables LLP(22)</p> <ul style="list-style-type: none"> • Acknowledges the protection Policy ENV1 gives to designated environmental resources. • Believes that section (b) of Policy ENV1 does not recognise where there is an economic or social reason for a development to proceed that is of greater importance than a strategic or local designation. 		
Modifications sought by those submitting representations:		
<p><u>Policy ENV1</u></p> <p>Inverclyde Renewables LLP(22)</p> <ul style="list-style-type: none"> • Amend Policy ENV1(b) (i) to state “there will be no unacceptable effects upon visual amenity”. 		
Summary of responses (including reasons) by planning authority:		
<p><u>Policy ENV1</u></p> <p>Inverclyde Renewables LLP(22)</p> <ul style="list-style-type: none"> • Policy ENV1 (b) (i) is worded to ensure that the visual amenity is protected where there is a strategic or local designation. An amendment to the wording would lessen the strength of that protection which is not required to provide for economic and social reasons for development which are covered in (b) (iii). 		

In accordance with the proposed LDP, the Council does not propose to amend Policy ENV1.

Reporter's conclusions:

Reporter's recommendations:

Issue 13	Green Network	
Development plan reference:	Chapter 2, p.12 Policy SDS4 – Green Network	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Inverclyde Renewables LLP(22)		
Provision of the development plan to which the issue relates:	The contribution of large scale renewal and regeneration projects to strategic and local green network	
Planning authority's summary of the representation(s):		
<p><u>Policy SDS4</u></p> <p>Inverclyde Renewables LLP(22)</p> <ul style="list-style-type: none"> • supports Policy SDS4, but believes there are additional circumstances where development may create improvements in the green network or facilitate improved access to the green network and contribute to achieving the goals specified in the Active Living strategy. 		
Modifications sought by those submitting representations:		
<p><u>Policy SDS4</u></p> <p>Inverclyde Renewables LLP(22)</p> <ul style="list-style-type: none"> • inclusion of the following wording in Policy SDS4: “Opportunities which enhance the green network and access to it will be considered in a positive manner.” 		
Summary of responses (including reasons) by planning authority:		
<p><u>Policy SDS4</u></p> <p>Inverclyde Renewables LLP(22)</p> <ul style="list-style-type: none"> • this policy clearly states the aim to safeguard the existing green network of routes and integral green spaces and the benefits to be obtained from embedding green principles in renewal and regeneration projects. • When determining whether a development is suitable or not, it would not be appropriate to place a greater emphasis on the opportunities a development provides for embedding greening principles compared to 		

other criteria. The development proposal would have to be looked at as a whole.

In accordance with the proposed LDP, the Council does not propose to alter the wording of Policy SDS4.

Reporter's conclusions:

Reporter's recommendations:

Issue 14	Open Space	
Development plan reference:	Chapter 8, Policy ENV4 – Safeguarding and Enhancing Open Space;	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Mactaggart & Mickel (55) Braeside Residents and Tenants (61)		
Provision of the development plan to which the issue relates:	The safeguarding and enhancement of open space, including playing fields, and the securing of open space through planning agreements.	
Planning authority's summary of the representation(s):		
<p><u>Open Space - General</u></p> <p>Mactaggart & Mickel (55)</p> <ul style="list-style-type: none"> • Cites Policy ENV4 and states that not all areas identified in the current local plan serve a useful purpose and/or have been overtaken by change in the surrounding area. <p><u>Open Space – Former St Gabriel's School, Greenock (r44)</u></p> <p>Braeside Residents and Tenants (61)</p> <ul style="list-style-type: none"> • Believe there has been a gradual loss of open and green space in the Braeside Road area. • State nothing has been done by the Council in the last 10 years to protect or enhance the open space • Are concerned there will be the loss of the last two open spaces in the area if the housing sites at the former Ravenscraig primary school and St Gabriel's primary school are developed. <p>Representations on this site are also dealt with in the Schedule 4 on Housing Sites in the Proposed Plan.</p>		
Modifications sought by those submitting representations:		
<p><u>Open Space - General</u></p> <p>Mactaggart & Mickel (55)</p> <ul style="list-style-type: none"> • Review open spaces within urban areas in line with SPP to assess their suitability for purpose and to identify alternative appropriate uses, including housing, and replacements found elsewhere. 		

Open Space – Former St Gabriel’s School, Greenock (r44)

Braeside Residents and Tenants (61)

- Remove the St Gabriel's primary school site from the LDP and retain it for open space.

Summary of responses (including reasons) by planning authority:

Open Space - General

Mactaggart and Mickel (55)

- An open space audit was carried out in 2011 to identify the amount of open space throughout Inverclyde which is shown on the Proposals Map. The next stage will be to assess the quality of the open space to determine where it can be enhanced or, if after consultation with the relevant communities, it is deemed surplus to requirement in its current use, examine how it can be put to better use.

This survey will be considered when the Local Development Plan Action Programme is updated.

Open Space – Former St Gabriel’s School, Greenock (r44)

Braeside Residents and Tenants (61)

- The St Gabriel’s site was not identified in the 2011 Open Space Audit. Any retention of open space within this area would have to be determined through the planning application and in accordance with Supplementary Guidance Planning Application Advice Note No. 3: Private and Public Open Space in Residential Development.
- The area of open space to the east of the St Gabriel’s site on Braeside Road will be retained as open space and is identified as such on the LDP Proposals Map.

Reporter’s conclusions:

Rporter’s recommendations:

Issue 15	Tree Preservation Orders	
Development plan reference:	Chapter 8, p. 63 , paragraph 8.3; Policy ENV6 Trees and Woodland	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Archibald Brown: Friends of Milton Wood (12) Billy Pickett (14) David Walker (27) Donna Pickett: Friends of Milton Wood (30) Graham Biggart (32) Rosemary Biggart (65) Susan Biggart (76) Cardwell Bay and Greenock West Community Council (37) Mary Isobel McCully (54) James Delaney (39) Simon Hutton (71)</p>		
Provision of the development plan to which the issue relates:	Protection of trees and woodland	
Planning authority's summary of the representation(s):		
<p><u>Milton/Duchal Wood, Kilmacolm</u></p> <p>Archibald Brown (12) Donna Pickett (30) Billy Pickett (14) Graham Biggart (32) David Walker (27) Rosemary Biggart (65) Susan Biggart (76)</p> <ul style="list-style-type: none"> • Cite Paragraph 8.3 of the Plan • Note that other parts of Kilmacolm have been protected by TPOs • State that the Wood is used as an educational resource. <p>The above comments are accompanied by a Report 'Tree Preservation Order – Milton Woods' (attached) describing the area, defining the area they would wish covered by the TPO, and detailing designations and policies covering the area.</p> <p>Donna Pickett (30)</p> <ul style="list-style-type: none"> • Cites Policy ENV6 Trees and Woodland (a) Tree Preservation Orders • Notes there have been no recent additions to Inverclyde's TPO list. • States the Wood has been under threat from planning proposals. • Believes the area is of importance for nature conservation and existing designations. • Contends there is a publicised need to protect the entrances to older estates such as Duchal. 		

Cardwell Bay and Greenock West End

Cardwell Bay and Greenock West Community Council (37)

- States there is a distinct lack of TPOs in Cardwell Bay and Greenock West.
- Believes the Council should take the opportunity to assign more TPOs.

Broadstone Avenue, Port Glasgow (r11)

Mary Isobel McCully (54)

- Believes an area in Broadstone Avenue, Port Glasgow, which is identified for housing development and was part of the old Broadstone Hospital and contained a market garden and orchard, has some interesting trees.

Representations on this site are also dealt with in the Schedule 4 on Housing Sites in the Proposed Plan – Port Glasgow.

Lower Mary Street, Port Glasgow (r10)

James Delaney (39)

Simon Hutton (71)

- The land on the proposed site at Lower Mary Street, Port Glasgow contains a significant number of mature trees, a burn and local wildlife, including owls, bats, squirrels and foxes.
- The woodland paths provide access to local amenities

Representations on this site are also dealt with in the Schedule 4 on: Housing Sites in the Proposed Plan – Port Glasgow.

Modifications sought by those submitting representations:

Milton/ Duchal Wood, Kilmacolm

Archibald Brown (12)

Billy Pickett (14)

David Walker (27)

Donna Pickett (30)

Graham Biggart (32)

Rosemary Biggart (65)

Susan Biggart (76)

- Designate a TPO, covering the area of Milton/ Duchal Wood specified in the submitted report, as a means of protecting this urban space for future generations.

Cardwell Bay and Greenock West End

Cardwell Bay and Greenock West Community Council (37)

- Assign TPOs to trees at the following locations:
 - Cove Road and the area between Cove Road and Battery Park,

Gourock

- Steel Street, Gourock
- Adam Street, Gourock
- Eldon Street, Greenock
- All trees in the West End Conservation Area (as outlined in the Local Plan map).

Broadstone Avenue, Port Glasgow (r11)

Mary Isobel McCully (54)

- Protect trees on the site at Broadstone Avenue through Policy ENV6.

Lower Mary Street, Port Glasgow (r10)

James Delaney (39)

Simon Hutton (71)

- Afford protection to the trees and woodland on the site for future generations through Policy ENV6 and TPOs.

-

James Delaney (39)

- Reclassify the area as Green Belt.

Summary of responses (including reasons) by planning authority:

Milton/ Duchal Wood, Kilmacolm

Archibald Brown (12)

Billy Pickett (14)

David Walker (27)

Donna Pickett (30)

Graham Biggart (32)

Rosemary Biggart (65)

Susan Biggart (76)

- Trees without a TPO such as those within Milton/Duchal Wood will have protection under Policy ENV6 Trees and Woodland, section (b) (i) – (iv).
- Milton/ Duchal Wood is currently designated as Green Belt and a Garden and Designed Landscape and has a Site of Importance for Nature Conservation and Core Path within it, affording it a great deal of protection. Any removal of trees within the wood has been carried out with a felling licence under a formal woodland management agreement with the Forestry Commission Scotland and with a requirement for replanting.
- Pressure for development within the wood, through previous applications, has been withstood using these existing designations.
- The existence of TPOs in other parts of Kilmacolm and the lack of any recent TPO designations is not justification for creating one at Milton/Duchal Wood. They are designated based on the need for protection of trees, not quota.

In accordance with the proposed LDP, it is the Council's view that the existing designations are sufficient to protect Milton/Duchal Wood for future generations as both a leisure and educational resource and it does not therefore propose to

amend the Plan to include the proposal for a TPO.

Cardwell Bay and Greenock West End

Cardwell Bay and Greenock West Community Council (37)

- None of the trees in the areas specified are in danger of deliberate damage or destruction, to make a TPO necessary. The trees in all the areas identified are on roadways, pavements or within parks and are therefore under the control of the Council. Unless they are causing problems they would be maintained or replaced and so are not under threat and requiring a TPO. TPOs should not be designated just because there are trees in existence and an area does not have as many TPOs as somewhere else.
- Trees that are not covered by a TPO are still protected by Policy ENV6 Trees and Woodlands section (b) (ii) 'protecting and promoting the positive management of hedgerows, street trees and any other trees considered to contribute to the amenity of the area'.
- Within the Greenock West End Conservation Area, trees not covered by a TPO have additional protection as it is necessary to give the Council 6 weeks notice prior to carrying out any works on a tree.

In accordance with the proposed LDP, the Council does not propose to designate any TPOs within the areas identified in the Cardwell Bay and Greenock West End area.

Broadstone Avenue, Port Glasgow (r11)

Mary Isobel McCully (54)

- The future of the trees will be determined through the planning application. There will be an opportunity at the application stage to comment on the retention of the trees. Any trees that remain on the site thereafter will be protected by Policy ENV6 (b) (ii).

In accordance with the proposed LDP, the Council does not propose to identify the trees on this site for protection.

Lower Mary Street, Port Glasgow (r10)

James Delaney (39)

Simon Hutton (71)

- This site was not identified as open space in the Open Space audit of 2011.
- The future of the trees will be determined through the planning application. There will be an opportunity at the application stage to comment on the retention of the trees. Any trees that remain on the site thereafter will be protected by Policy ENV6 (b) (ii).

James Delaney (39)

- The site lies within the urban area and would therefore not be appropriate for a Green Belt designation.
-

In accordance with the proposed LDP, the Council does not propose to identify the trees on this site for protection.

Reporter's conclusions:

--

Reporter's recommendations:

--

Issue 16	Conservation Areas	
Development plan reference:	Chapter 9, pp 73-74 Policies HER1 – Development which Affects the Character of Conservation Areas; HER2 – Demolition in Conservation Areas	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Cllr David Wilson (28) Kilmacolm Civic Trust (63)		
Provision of the development plan to which the issue relates:	Designation and protection of conservation areas	
Planning authority's summary of the representation(s):		
<p><u>Proposed Kilmacolm Conservation Area</u></p> <p>Cllr David Wilson (28)</p> <ul style="list-style-type: none"> Disagrees with the proposed conservation area at The Cross, Kilmacolm as it will be too restrictive on shops and flatted houses <p>Kilmacolm Civic Trust (63)</p> <ul style="list-style-type: none"> Fully supports the proposed conservation area at The Cross, Kilmacolm <p><u>Policy HER1 and Policy HER2</u></p> <p>Kilmacolm Civic Trust (63)</p> <ul style="list-style-type: none"> Believes Policies HER1 and HER2 need to be worded more strongly to reflect that the consideration of the environmental setting is critical, particularly in relation to the Old Community Centre in Kilmacolm 		
Modifications sought by those submitting representations:		
<p><u>Proposed Kilmacolm Conservation Area</u></p> <p>Cllr David Wilson (28)</p> <ul style="list-style-type: none"> Removal of the proposed Kilmacolm conservation area from the Local Development Plan. 		

Kilmacolm Civic Trust (63)

- Progress the proposed Kilmacolm conservation area through the Local Development Plan.

Policy HER1 and Policy HER2

Kilmacolm Civic Trust (63)

- Strengthen the wording of Policies HER1 and HER2 to afford greater protection to the environmental setting of conservation areas.

Summary of responses (including reasons) by planning authority:

Proposed Kilmacolm Conservation Area

Cllr David Wilson (28)

Kilmacolm Civic Trust (63)

- The boundary of the proposed conservation area was defined on the principles of uses/activities, history, architecture, character and setting. The significance of the area lies in the amount of the Victorian village centre which largely remains intact with little significant 20th century development. Piecemeal change, however, or unsympathetic larger development threatens to dilute the character and special interest of the village.
- During the Main Issues Report (MIR) consultation process, the proposed conservation area was welcomed by Historic Scotland as having merit. Scottish Civic Trust (SCT) was commissioned to prepare an assessment of the proposed conservation area. They carried out a further consultation with local stakeholders, businesses and the Community Council on comments submitted at the MIR stage. The benefits and implications of conservation area designation were presented and discussed and a range of views obtained.
- The burden on property/business owners from reduced Permitted Development rights were a concern but these were countered with the possibility that increased attractiveness of the village centre (from the use of appropriate materials and sympathetic redevelopment) could lead to an increase in business. The attached extract from the report on The Assessment of the Proposed Kilmacolm Cross Conservation Area contains a summary of the issues raised and how it was proposed to take them forward.
- Kilmacolm Civic Trust has now submitted a representation in favour of the proposed conservation area, while the Community Council has intimated it welcomes the principle of the conservation area but with further detailed consultation on it in future. No other objections to the proposed conservation area have been received apart from Cllr Wilson's.

In accordance with the proposed LDP, the Council proposes to progress the designation of a conservation area at The Cross, Kilmacolm.

Policy HER1 and Policy HER2

Kilmacolm Civic Trust (63)

- Policies HER1 and HER2 state that proposals within conservation areas will be assessed having regard to Historic Scotland's Scottish Historic Environment Policy (SHEP) and the series of Managing Change in the Historic Environment guidance notes. These are national policy and guidance documents written by the experts in this field. The Council is confident that they have taken account of the protection that needs to be afforded to the environmental setting in conservation areas.

In accordance with the proposed LDP, the Council does not propose to amend Policies HER1 and HER2.

Reporter's conclusions:

Reporter's recommendations:

Issue 17	Gardens and Designed Landscapes (Enabling Development)	
Development plan reference:	Chapter 9, Policy HER7 Chapter 6, Policy RES7	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Cllr David Wilson (28) Ms Donna Pickett: Friends of Milton Woods (30) Mr Ralph Leishman (62) Kilmacolm Civic Trust (63) Ms Rosemary Biggart (65) Kilmacolm Community Council (71) Duchal Estate (73) Ms Susan Biggart (76)</p>		
Provision of the development plan to which the issue relates:	Objections to the policy on Gardens and Designed Landscapes and Enabling Developments	
Planning authority's summary of the representation(s):		
<p>Cllr David Wilson (28) Supports the Gardens and Designed Landscapes for Ardgowan, Finlaystone and Duchal Estates, but believe that the criteria is too restrictive.</p> <p>Ms Donna Pickett: Friends of Milton Woods (30) Mr Ralph Leishman (62) Ms Rosemary Biggart (65) Ms Susan Biggart (76) As the current Scottish Government's "Enabling Development" approach towards 'A' listed buildings is based on the English Heritage version, more rigour should be added to the policy. Two additional criteria should be added to policy HER7, and one criterion removed.</p> <p>Kilmacolm Civic Trust (63) Welcomes the enabling policies, but they are inconsistent, not robust enough nor complete.</p> <p>Policy HER7 only allows enabling development within the Designed Landscapes, which are of greater landscape value than the surrounding Green Belt. Policy RES7 would not allow for enabling development in respect of the three grade 'A' listed buildings, nor for the restoration of any grade 'B' or 'C' properties , eg listed outbuildings in connection with the grade 'A' building.</p> <p>It is considered that enabling, and consequent loss of Green Belt land, for Grade 'C' listed buildings, is not justified at this stage.</p>		

Kilmacolm Community Council (71)

Welcomes the recognition that 'enabling' requires a specific policy and not just relying on the Green Belt policy. Considers that there are inconsistencies and ambiguities between policies RES7 and HER7, and that a clear policy for Enabling Development needs to be published and consulted upon, accompanied by supplementary guidance to cover the details, prior to the policy being implemented. The areas that are unclear are:

- whether an enabling development proposal in the Green Belt, but outside a Designed Landscape, will receive more favourable treatment than a purely profit seeking application in the Green Belt
- there is no mention of listed buildings below 'A' status
- whether the proposed policies apply to outbuildings of a lower grade of listing than the associated main building
- the interaction of the two policies is unclear, and could be read in a way as to give an incentive for the owner of a qualifying building to locate a new development in the Designated Landscape rather than elsewhere in the Green Belt

Duchal Estate (73)

Supports the principle of Policy HER7 where enabling development will be considered in a favourable manner, subject to certain criteria.

However objection is made to Policy HER7 with direct reference to the land promoted for residential development behind the former Police House field site as part of Duchal Estate in Kilmacolm. There were no statutory objections against the recent planning application for a substantial school development on the Police House field site for which the Head of Regeneration and Planning recommended approval. On the basis of consistency, the proposal for residential development on this site should be considered in the same context, and in terms of the associated specialist reports on habitat, tree survey and landscape, development on this site is considered appropriate.

Modifications sought by those submitting representations:**Cllr David Wilson (28)**

None stated.

Ms Donna Pickett: Friends of Milton Woods (30)**Mr Ralph Leishman (62)****Ms Rosemary Biggart (65)****Ms Susan Biggart (76)**

Insert the following criteria into policy HER7:

- it is necessary to resolve problems arising from the inherent needs of the place, rather than the circumstances of the present owner, or the purchase price paid. In addition, it must be shown that sufficient funds are not available from any other sources
- it will not materially harm the heritage values of the place or its setting

Remove the following criterion from policy HER7:

- it can be demonstrated that available sources of financial assistance have been investigated without success

Kilmacolm Civic Trust (63)

Would like to see an explicit enabling policy which relates to the three grade 'A' buildings, protecting the Designed Landscapes at least as much as the Green Belt. HER7 should expand to include:

- the proposals are capable of securing its long term future
- any benefit to the public/community is a new benefit and not historic. The processes for establishing and agreeing the benefit is set out in policy
- applications for planning permission for enabling development must be made in detail
- the policy should not be implemented until the Supplementary Guidance notes are consulted upon and agreed
- the development has to meet standard residential development criteria of sustainability, etc

Would also like to see a clear, strong policy on the use of enabling development for grade 'B' listed structures which should apply the same rigour as to grade 'A' premises. Where a grade 'B' listed building is associated with grade 'A' buildings, their conservation should only be permitted once the grade 'A' building was secure or not at risk for at least 20 years.

Supplementary Guidance on enabling should address all categories of listed building.

Kilmacolm Community Council (71)

A clear policy should:

- spell out the policy applying to all development intended to fund the preservation of listed buildings
- recognise that the development should not only be the minimum necessary, but also incorporate a maintenance plan to ensure that the development being considered is not part of a longer term piecemeal erosion of something (eg Green Belt) that would otherwise be retained
- expose the financial balance between development and conservation to public scrutiny. This should include market testing as the issue is about saving the building and not the owner's right to stay in it
- expose the nature and extent of public benefit

Duchal Estate (73)

It is requested that Policy HER7 is deleted as part of this development proposal.

Summary of responses (including reasons) by planning authority:

General

- Council is supportive of enabling for the three G&DL. Enabling associated with other listed buildings, A, B or C, will be considered against other relevant LDP policies on their individual merits. This is the reason why there is no general enabling policy – the policy is about G&DL, and enabling is mentioned as being appropriate in certain circumstances.
- Reason for proposal to include enabling within the G&DL policy relates to

pressure that these locations have come under – Duchal and Ardgowan. In addition Duchal asked for the inclusion of an enabling policy in the LDP.

- Previous developments that have been approved on the basis of 'enabling', eg Auchinbothie, have been considered successful – they were considered against LP policies in a satisfactory manner, without the need for an enabling policy.

Cllr David Wilson (28)

- the purpose of the policy is to only allow enabling development for the houses associated with the G&DL when all other options have been tested
- it is intended that the policy is testing

Ms Donna Pickett: Friends of Milton Woods (30)

Mr Ralph Leishman (62)

Ms Rosemary Biggart (65)

Ms Susan Biggart (76)

- the criteria is appropriate to balance the necessary protection against the benefit to the community

Kilmacolm Civic Trust (63), Kilmacolm Community Council (71)

- consider that Policy HER7 is consistent and robust
- the reason for the policy only applying to the G&DL, areas of greater landscape value than the surrounding Green Belt, is because of the importance of the 'A' listed houses to the landscape. The policy states that enabling development will only be permitted "where there is no adverse impact on the resource" – it is considered that the policy has at least as much protection as the Green Belt policy.
- the policy does not preclude enabling development on land outwith the G&DL to assist in retaining the 'A' listed buildings, and in this regard other relevant policies would apply. This policy only applies to development within the boundaries of the G&DLs.
- the policy is only designed to protect and secure the three 'A' listed houses associated with the G&DL for the future. It is not intended to be applied for other listed buildings, where each one will be considered against the relevant policies on their merits, as has been successfully achieved in the past.
- the restoration of 'B' and 'C' listed buildings associated with the G&DLs will be considered on their merits and against the relevant policies of the Plan (eg ENV2 and RES7)
- HER7 as it stands is considered to address the matters of the long term future and public benefit (new, not historic)
- planning applications will require to be made in detail, as all applications relating to listed buildings require to do
- disagree that 'B' listed buildings should be the subject of an enabling policy (see bullet point 4 above)

Duchal Estate (73)

- welcome the support for the policy
- disagree that the policy should not apply to the proposed development at the Police House field site. It should apply to all and any type of

development within the G&DL. Policy HER7 makes it clear that, for an enabling development proposal, it must be demonstrated that available sources of financial assistance have been investigated without success – this would include the ability of the owner to fund the necessary works to the ‘A’ listed building

- any proposal for residential development within the G&DL area that is not to be associated with ‘enabling’, will be considered against the relevant policies and on its merits. However if a subsequent application for an enabling development should be submitted, the financial benefits that have accrued from the previous approved residential development will be taken into account.

In accordance with the proposed LDP, the Council does not propose to amend Policies HER7.

Reporter’s conclusions:

Reporter’s recommendations:

Issue 18	Renewable Energy	
Development plan reference:	Chapter 10, pp77-78, paragraphs 10.2 - 10.5; Policy INF1- Renewable Energy Developments; Chapter 2, pp.9-10, paragraph 2.8 Policy SDS1 – Climate Mitigation and Adaptation - Reducing Carbon and Energy Use Chapter 4, p.27; Policy ECN4 – Business and Industrial Proposals Outwith Designated Areas	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Inverclyde Renewables LLP (22) Inverkip & Wemyss Bay Community Council (31) Save Your Regional Park (42) Kilmacolm Civic Trust (63)		
Provision of the development plan to which the issue relates:	Wind energy developments	
Planning authority's summary of the representation(s):		
<p><u>Wind Energy Developments – General</u></p> <p>Kilmacolm Civic Trust (63)</p> <ul style="list-style-type: none"> • Does not support wind farm construction in Inverclyde. • Sees no case for individual or small scale wind turbine developments around Kilmacolm. • The use of threshold and landscape capacity when assessing wind energy applications is important. <p>Inverkip & Wemyss Bay Community Council (31)</p> <ul style="list-style-type: none"> • Notes that national guidance on the distance for siting wind turbines from a residential area is 'up to 2km' rather than a specific distance. <p><u>Wind Energy Developments within Clyde Muirshiel Regional Park</u></p> <p>Kilmacolm Civic Trust (63)</p> <ul style="list-style-type: none"> • strongly opposes wind farm development in any part of CMRP. <p>Inverkip & Wemyss Bay Community Council (31)</p>		

- Notes the Council's intention to safeguard Clyde Muirshiel Regional Park (CMRP) and reconcile the benefits of renewable energy developments with any detrimental effects on the Park while at the same time there are increased numbers of applications for small and large scale farms.

Save Your Regional Park (42)

- Notes that a substantial part of Inverclyde is within Clyde Muirshiel Regional Park (CMRP).
- States there has been an increase in planning applications for wind turbines in the last decade and there is potential for this type of development to damage CMRP and its resources.
- Believes industrial intrusion from wind farm developments is completely incompatible with the aims and objectives of CMRP.
- Considers it is vital that CMRP is preserved from all pressures of industrialisation.

Policy INF1

Inverclyde Renewables LLP (22)

- Believes the identification of significant effects by an Environmental Impact Assessment does not mean that such effects are to be considered unacceptable or that a development should not be granted consent if such effects are identified.

Kilmacolm Civic Trust (63)

- Notes the importance of restoration and decommissioning plans for wind farms to leave as little trace as possible at the end of their operational life.

Save Your Regional Park (42)

- Maintains that noise (Including low frequency sound) is the main health hazard from wind turbines too close to habitation.

Modifications sought by those submitting representations:

Wind Energy Developments - General

Kilmacolm Civic Trust (63)

- Policy to state that no wind farm developments will be permitted within Inverclyde.
- Policy to state that no individual or small scale wind turbines will be permitted around Kilmacolm.
- The consideration of the cumulative impact of wind turbine applications in Inverclyde.

Inverkip & Wemyss Bay Community Council (31)

- Include a statement in the Local Development Plan that wind turbine developments will not be permitted within 2km of residential areas.

Wind Energy Developments within Clyde Muirshiel Regional Park

Kilmacolm Civic Trust (63)

- No wind farm development in CMRP.

Inverkip & Wemyss Bay Community Council (31)

- Include a statement in the Local Development Plan that large scale (more than 3 turbines) wind turbine developments will not be permitted within the boundaries of the Clyde Muirshiel Regional Park.

Save Your Regional Park (42)

- Include in Policy ECN4 a clear and unambiguous statement that no further 'industrial' development in the form of wind turbines will be permitted in CMRP.

Policy INF1

Inverclyde Renewables LLP (22)

- Amend the wording of Policy INF1 to state that:
 - "The Council will support development required for the generation of energy from renewable sources subject to the proposal not having **unacceptable** significant effects upon..."
 and
 - Criterion (c) - "neighbouring settlements **by virtue of visual, noise or shadow flicker effects**"
 - Add the wording at the end of the Policy: - "**In circumstances where unacceptable significant adverse effects are predicted then development proposals will be considered in terms of the associated social or economic benefits.**"

Kilmacolm Civic Trust (63)

- Build a requirement for restoration and decommissioning plans into Policy INF1.

Save Your Regional Park (42)

- Include noise when considering the list of items upon which renewable energy development can have a significant adverse effect.

Summary of responses (including reasons) by planning authority:

Wind Energy Developments – General

Kilmacolm Civic Trust (63)

- With Government targets to be met, it is not possible to rule out any wind energy developments in Inverclyde through Local Development Plan policy. Extensive criteria are in place through Policy INF1 with additional guidance in the Renewable Energy Supplementary Guidance to ensure developments go to the most appropriate locations.
- Kilmacolm cannot be singled out within Inverclyde for protection against the development of small scale or individual wind turbines. Applications will be assessed against the criteria of Policy INF1 as they will be anywhere else in Inverclyde.
- A landscape capacity study for wind turbine developments is being prepared in association with the Glasgow and the Clyde Valley authorities for use in addressing the cumulative impact of wind energy applications.

In accordance with the proposed LDP, the Council does not propose to amend Policy INF1.

Inverkip & Wemyss Bay Community Council (31)

- A distance of 'up to 2km' is given as a guide to allow for special local circumstances and geography to be taken into account, as stated in Scottish Planning Policy. The Council does not intend to change this through the Local Development Plan.

Wind Energy Developments within Clyde Muirshiel Regional Park

Kilmacolm Civic Trust (63)

Inverkip & Wemyss Bay Community Council (31)

Save Your Regional Park (42)

- It is not necessary to specifically identify Clyde Muirshiel Regional Park (CMRP) for protection from wind farm developments of 3 turbines or more. The criteria of Policy INF1 will ensure that development of an inappropriate scale will not be permitted.
There is a Framework Guidance Document in place for wind farm developments in CMRP produced in association with the three local authorities covered by the Park.
- CMRP is also protected by other policies within the Plan as it lies within the Green Belt and Countryside, and has international, national and local natural and built heritage designations within its boundary

Save Your Regional Park (42)

- Policy ECN4 could be applied to development in the Green Belt and Countryside area but generally relates to industry and business within the urban area. It is not necessary to amend this Policy to take account of pressure on Clyde Muirshiel Regional Park given the protection afforded it

by other policies in the Local Development Plan

In accordance with the proposed LDP, the Council does not propose to amend Policy INF1 or Policy ECN4.

Policy INF1

Inverclyde Renewables LLP (22)

- Significant adverse effects by virtue of being 'significant' imply that they would be unacceptable. It would be unlikely to get acceptable significant adverse effects. The addition of the word 'unacceptable' is not, therefore, required.
- The qualification of criterion (c) with the proposed additional wording is not required and could preclude other types of impact on neighbouring settlements. The preamble to Policy INV1 addresses impacts to be considered as does the Supplementary Guidance on Renewable Energy.
- Policy INF1 has a presumption in favour of renewable energy development unless it has a significant adverse impact on the listed criteria. Any proposal will also be assessed against the other relevant LDP policies where social or economic benefits will be considered as they would be for any type of development. It is not necessary to include these as an additional consideration specifically for renewable energy developments.
- Kilmacolm Civic Trust (63)
- Requirements for restoration and decommissioning will be dealt with through conditions on the planning permission which will be specific to the site.

Save Your Regional Park (42)

- Noise is mentioned in paragraph 10.3 of the Plan and will be addressed when an application is determined with reference to Scottish Planning Policy (SPP) paragraph 187 which highlights noise for consideration.

In accordance with the proposed LDP, the Council does not propose to amend Policy INF1

Reporter's conclusions:

Reporter's recommendations:

Issue 19	Energy Efficiency	
Development plan reference:	Chapter 10, p.78 paragraphs 10.6 and 10.7; Policy INF2 – Energy Efficiency	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Persimmon Homes (20) Scottish Government (50)		
Provision of the development plan to which the issue relates:	Energy Efficiency in compliance with Building Standards	
Planning authority's summary of the representation(s):		
<u>Policy INF2 –Energy Efficiency</u> Persimmon Homes (20) <ul style="list-style-type: none"> • Believe the Local Development Plan is not the right place for policies which relate to Building Standards matters but should be concerned with matters relating to site planning. Scottish Government (50) <ul style="list-style-type: none"> • Believe Policy INF2 does not expressly deal with legislative requirements regarding green house gas emissions. 		
Modifications sought by those submitting representations:		
<u>Policy INF2 – Energy Efficiency</u> Persimmon Homes (20) <ul style="list-style-type: none"> • Remove Policy INF2. Scottish Government (50) <ul style="list-style-type: none"> • Invite the Reporter to give a view on whether Policy INF2 is sufficient. 		
Summary of responses (including reasons) by planning authority:		

Policy INF2 – Energy Efficiency

Persimmon Homes (20)

- There is a legislative requirement under Section 3F of the Town and Country Planning (Scotland) Act 1997 to provide a policy on Green House Gas Emissions in the Local Development Plan.

The Council does not propose to remove Policy INF2.

Scottish Government (50)

- It is considered that policy INF2 addresses the requirements of the legislation, under the Town and Country Planning (Scotland) Act 1997, the Climate Change Act 2009 and the Building (Scotland) Regulations 2004, in a satisfactory manner and there is no requirement to amend the policy as suggested. (*This section to be expanded.*)

Reporter's conclusions:

Reporter's recommendations:

Issue 20	Miscellaneous	
Development plan reference:	Chapter 3, Policy DOS2 – Development Option Sites Chapter 4, Policy ECN1 – Business and Industrial Areas Strategic Environmental Assessment	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Clydeport Operations Ltd (25) Mr Ian McCallum (35) Stuart McMillan MSP (75) Scottish Natural Heritage (SEA) Historic Scotland (SEA) Scottish Environmental Protection Agency (SEA)		
Provision of the development plan to which the issue relates:	Development Option Sites Strategic Business Locations Environmental Report of the Strategic Environmental Assessment of Proposed Local Development Plan	
Planning authority's summary of the representation(s):		
<p><u>John Street, Greenock</u></p> <p>Stuart McMillan MSP (75)</p> <ul style="list-style-type: none"> • has concerns regarding non-residential uses such as business and industrial becoming part of the site • supports the residents' wishes to retain the site for residential use only <p><u>Green Belt Boundary</u></p> <p>Mr Ian McCallum (35)</p> <ul style="list-style-type: none"> • advises that there is no logical or practical reason to change the boundaries shown as KC008 and KC011 (in the Green Belt Review). <p><u>Ocean Container Terminal</u></p> <p>Clydeport Operations Ltd (25)</p> <ul style="list-style-type: none"> • welcomes and supports the identification of Ocean (Container) Terminal as a Strategic Business Location. • believes the Ocean Terminal should be recognised as an important tourist asset within Inverclyde, boosting the local economy and with further potential to do so. • seeks the recognition that the development and enhancement of tourist facilities should be permitted in the vicinity of Ocean Terminal. 		

Strategic Environmental Assessment

Scottish Environment Protection Agency

Welcome table in Appendix D and are satisfied that in general our comments at the scoping stage have been taken into account and an adequate assessment of the strategy has been carried out.

However, disagree that positive and negative effects will necessarily balance out, where a potential negative impact has been identified, mitigation measures should be put forward. For some sites, this is not the case.

Historic Scotland

Overall, welcome the thorough approach taken to the preparation of the report. Consider it well structured, clear and concise. Happy with the non-technical summary and the context set out in the background. Happy overall with the baseline as set out but feel it could also make reference to undesignated, as well as the designated, assets. Welcome the inclusion of the Constraints Map, consideration should be given as to how listed buildings can be included. Content with the objectives set for cultural heritage.

Overall, welcome the approach taken to the assessment of the policies against the objectives. Note the commentary on the effects predicted but question some of the conclusions drawn for policies ENV2, ENV3, HER3, HER5 and HER7 and for Ravenscraig Hospital, Greenock.

Note reference to mitigation measures in Appendix H but feel that if they were separated out it would assist identifying where measures are proposed or have been taken into account.

Welcome the acknowledgement of requirement to monitor the significant effects of the plan, but unclear as to how this is to be achieved.

Would be beneficial to consider using indicators that reflect the outcomes of the plan. This should be set out in the Post-Adoption Statement and are happy to discuss this.

Scottish Natural Heritage

Pleased to note that the additional housing development sites that gave most concern in the Main Issues Report, do not appear in the Proposed Plan. Do however have some significant concerns about the SEA as presented and the extent to which it has in fact influenced the Proposed Plan.

It seems likely that a number of alternative options considered as part of the process may not have been genuinely realistic given the frequency with which options assessed as having the best environmental outcome have not been taken forward.

The SEA of some policies, especially those intended to protect the environment,

appears to have been based on a substantial misunderstanding of what these policies are intended to achieve and be based on the assumption that policies such as ENV1 are intended to facilitate development on environmental designations, rather than restrict it. As such, unreasonable negative conclusions appear to have been reached, in turn distorting the assessment of cumulative impacts. None of this appears to have influenced the content of the Proposed Plan however, as mitigation does not seem to be clearly expressed in the Plan.

It is notable how many proposals are assessed as requiring mitigation to be acceptable, but that this does not appear to have influenced the policies in the plan itself in order to ensure this mitigation is achieved. In every case, it is stated that detailed applications will require to be supported by mitigation measures, but without any requirement in policy, it is hard to be convinced that it will be achieved in all cases. Would normally expect the LDP itself to set out in some way how impacts will be mitigated

The Council states that both the preferred options for open spaces in the urban area (Issue 8 in the Main Issues Report), to protect all areas of open space and to consider other uses for urban open space that does not contribute to recreational or visual amenity, have been taken forward to the Proposed Plan. Find it difficult to envisage how this is possible and the adoption of both 'alternatives' raises questions about the extent to which the SEA process had any influence on the development of the Proposed Plan. It might be expected that the negative impacts identified of developing some areas of open space would require mitigation measures.

Concern regarding the decision to adopt the preferred option for undeveloped housing sites on the settlement edge (Issue 15 in the MIR), despite that alternative of returning them to the greenbelt being the most environmentally positive. If returning some of these sites to the greenbelt was not a realistic option, this should not have been considered as an alternative to be assessed under SEA.

Policy APC1 is assessed as having potential negative impacts. As this includes part of a SINC and the proposals include residential development, would argue impacts will certainly be negative unless policy or mitigation measures are in place to ensure the integrity of the designation were maintained, or adequate compensatory habitat management required. At present mitigation is deferred to the development management process.

It does not appear that the Arran Avenue site has been assessed.

Modifications sought by those submitting representations:

John Street, Greenock

Stuart McMillan MSP (75)

- identification of the site for residential development only.

Green Belt Boundary

Mr Ian McCallum (35)

- remove the proposed changes from the 2013 LDP

Ocean Container Terminal

Clydeport Operations Ltd (25)

- recognition of Greenock Ocean Terminal as a Strategic Economic Resource within the LDP

Strategic Environmental Assessment

Scottish Environment Protection Agency

- Where both positive and negative impacts have been assessed to balance out, establish mitigation measures for the negative impact. Ensure all instances where negative impacts have been identified, corresponding mitigation measures are proposed.

Historic Scotland

- Make reference in Table 2 to the undesignated as well as designated historical asset types.
- Consider how listed buildings can be shown on the Constraints Map.
- Change the likely impacts on cultural heritage of Natural Heritage and Environmental Resources polices such as ENV2 and ENV3 from potentially negative to potentially negative or positive.
- Change the likely impact on cultural heritage in polices HER3 and HER5 from no significant impacts to potentially positive due to e.g. the protection afforded by Conservation Areas.
- Change the likely impact on cultural heritage in policy HER7 from significant positive to significant positive or potential negative e.g. on setting.
- Change the likely impact on cultural heritage for site 41 – Ravenscraig Hospital, Greenock from potential positive to potentially positive and negative dependent upon the development that is brought forward.
- Create a separate box or similar in Appendix H for the mitigation measures.

Scottish Natural Heritage

- The Glasgow and Clyde Valley Landscape Assessment should be used and listed as a landscape baseline resource in Appendix F.
- Include the Green Network along with the Core Paths as a material assets baseline and its protection and enhancement as an objective to assess policies and proposals against in Table 2.

- Identify and map the existing Green Network.
- Express mitigation for identified negative impacts of the plan clearly within the Plan.
- Change the likely impact on biodiversity, flora and fauna for policy ECN1(b) – Faulds Park, Gourrock to negative due to partial overlap with SINC and set out need for mitigation measures.
- Change the likely impact on biodiversity, flora and fauna for policy ECN1(e) e10 – Inverkip Power Station from potentially negative to negative.
- Include in the comments of the impact on biodiversity, flora and fauna, the impact on the TPO for RES3 r1 – Former Broadfield Hospital.
- Change the likely impact on biodiversity, flora and fauna for policy RES3 r52 – Levan Farm (Phase 3) to negative due to partial overlap with SINC and set out need for mitigation measures.
- Change the likely impact on biodiversity, flora and fauna for policy RES3 r57 – Inverkip Power Station from potentially negative to negative.
- Change the likely impact on biodiversity, flora and fauna for policy TCR6 tc12 – Inverkip Power Station to at least potentially negative.
- Change assessment of Policy ENV1, ENV2, ENV5 & HER7 to having positive effects in terms of biodiversity, flora and fauna and landscape.

Summary of responses (including reasons) by planning authority:

John Street, Greenock

Stuart McMillan MSP (75)

- Policy DOS2 is the gateway policy to the Supplementary Guidance for the Development Option Sites which includes John Street and as such does not specifically refer to business and industrial use. Details for the site are in the Supplementary Guidance on the Local Development Frameworks. Consequently, there is no reference in Policy DOS2 that could be removed.
- As stated in the Supplementary Guidance, the Registered Social Landlord has yet to decide if there is a requirement for residential use on the John Street site, and therefore all development options for the site should remain, including business and industry for which there is justification, given the close proximity of existing uses.

In accordance with the proposed LDP, the Council does not propose to alter the wording of Policy DOS2 or Supplementary Guidance on Local Development Frameworks.

Green Belt Boundary

Mr Ian McCallum (35)

- The proposed Green Belt boundary was changed from the adopted Local Plan (2005) to more accurately reflect the built up area of the village. The Green Belt boundary in the adopted Plan does not follow any visible boundary, and indeed cuts through an identified Site of Importance for Nature Conservation (SINC). The proposed boundary follows the line of the

SINC boundary on its northern side. This results in a more certain, long term, defensible Green Belt boundary.

In accordance with the proposed LDP, the Council does not propose to alter the Green Belt boundary at this location.

Ocean Container Terminal

Clydeport Operations Ltd (25)

- Policy ECN1 (a) (ii) states that favourable consideration will be given to 'new development and support for the continuation of current uses for the operation of the international Ocean Terminal Strategic Freight Transport Hub' which is how it is referred to in the Glasgow and the Clyde Valley Strategic Development Plan, Spatial Framework 1, Schedule 3. Although not named, this does include the cruise liner port which constitutes one of the current uses and which is included in Figure 2.2 of the LDP.

Clydeport Operations Ltd has proposed certain changes to the wording of Policy ENC1, and while it is agreed that these changes would adequately retain the meaning and intention of the policy, they are not considered to be necessary for the policy to remain effective. However if the Reporter was minded to recommend a change to the policy suggested by Clydeport Operations Ltd, the Council would be amenable to this recommendation.

In accordance with the proposed LDP, the Council does not propose to alter the wording of Policy.

Strategic Environmental Assessment

Scottish Environment Protection Agency

- Positive and negative impacts balancing out was only identified in the assessment of the MIR. This is not carried forward in the assessment of the Proposed Plan.
- All negative impacts identified in the assessment of the Proposed Plan have corresponding mitigation measures set out.

Historic Scotland

- Table 2 and the policies and sites highlighted will be updated in the final Environment Report, which will accompany the Adopted Local Development Plan.
- Listed buildings are too numerous to identify on the Proposals Map. However the information will be readily available on the Council's website and public mapping system.

- The mitigation measures will be incorporated into a separate text box in the final Environment Report, which will accompany the Adopted Local Development Plan.
- Grateful for offer of support in drawing up monitoring indicators for the Post Adoption Statement.

Scottish Natural Heritage

There were only 2 instances where the most environmentally positive option was not taken forward to the Proposed Plan from the MIR. Once at Port Glasgow Industrial Estate, which SNH have no in-principle objections to and the other for the edge of settlement sites. In this case, returning the sites to the greenbelt could have been a realistic option if other sites which allowed the affordable housing need to be met within the urban areas had come forward through the consultation process. As this did not happen, and in order to meet the requirement for a range of sites for housing, and to avoid having to release other sites from the greenbelt, it was decided to identify some of these sites for affordable housing with others contained within the settlement boundaries, and none returned to the greenbelt.

The assessment of the environmental protection policies was undertaken on the basis of the likely impact *if* development were to occur. This may indeed be an overly pessimistic and negative view, and as pointed out, the development would cause the environmental damage, not the policy itself which aims to limit development. The assessment of these policies will be revisited for the final Environmental Report which will accompany the Adopted Local Development Plan.

The negative impacts identified for one policy will generally be mitigated through the application of other, environmental protection policies in the plan. The issue of the mitigation for one policy not being included within that policy arises due to the fact that the policies have been assessed in isolation. However the policies will not be applied in isolation but taken together as a whole. Any development would be assessed against all the relevant policies in the plan, which is why it is stated that mitigation would be decided through the development management process when an application for development was made. This will be set out more explicitly in the final SEA.

The Glasgow and Clyde Valley Landscape Assessment, and the Green Network will be added to Table 2 as a baseline document for landscape and material assets respectively. Although the green network was not listed as a material asset in Table 2 and was not an explicit objective for the assessment of the plan, impacts on it were taken into account in the assessment of policies under the headings of biodiversity, flora and fauna and landscape.

The decision to take both preferred alternatives for open space (to protect all open spaces irrespective of size and to consider alternative development for some where appropriate) forward to the Proposed Plan, should be read in the context of the alternative to protect only urban open space over a certain size. Taking both forward means that even small pieces of valued open space will be protected, while larger pieces that are not required can be promoted for

development.

Where sites contained part of a SINC or other environmental designation, they were assessed as having a potential negative impact, as the exact layout of the development and therefore impact on this designated resource is unknown. Once a planning application was made for the site, the existence of the designation would be taken into account in the scheme layout and the designation would be protected by the relevant policies. Mitigation measures would also require to be provided if there were any likely negative impact on the resource. Where such sites have not been assessed as having a potential negative impact in relation to biodiversity, flora and fauna, this will be included in the final Environmental Report which will accompany the Adopted Local Development Plan.

The TPO at Broadfield Hospital will be included in the discussion of impact on biodiversity, flora and fauna in the final Environmental Report which will accompany the Adopted Local Development Plan.

The Arran Avenue site is included in the assessment as 'Parkhill', and is assessed along with Levan Farm which identifies negative impacts on biodiversity, flora and fauna due to the development of a Greenfield site. The SINC designation that exists on this site will be included in the discussion of this likely impact in the final Environmental Report which will accompany the Adopted Local Development Plan. It should be noted that the site has now gained planning consent for residential development.

The Cumulative Impacts table in Appendix 1 will be revised based on changes made to the individual policies in the final Environmental Report.

Reporter's conclusions:

--

Reporter's recommendations:

--