



From:

Mr R.N. Cameron
Chairman Kilmacolm Civic Trust

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To:

Mr Alan Williamson
Planning Policy Team Leader
Regeneration and Planning
Inverclyde Council
Municipal Buildings
Greenock PA15 1LY

1st July 2021

Dear Mr Williamson

Inverclyde Proposed Local Development Plan 2021 (Proposed Plan and Draft Supplementary Guidance) – Kilmacolm Civic trust Comments

Thank you for giving us the opportunity to comment on the Proposed Local Development Plan 2021.

Kilmacolm Civic Trust Comment

Summary

We re-assert our position that you have not adequately demonstrated a robust housing demand for Kilmacolm and Quarriers Villages as demanded by Scottish Government Guidelines, and our view is contrary to yours: we agree with your Housing Demand Tool that predicts a decreasing population, but we do not accept that precious Greenbelt land in and around our villages should be released to possibly meet a political “aspiration”.

We thus strongly oppose the release of any Greenbelt in and around Kilmacolm and Quarriers villages, especially as Scottish Government Reporters have consistently stated, there are more appropriate places in the Renfrewshire Submarket in which to build.

We do not support the Council’s plan to designate the areas R61 (West of Quarry Drive) and the enlarged area R62 (Smithy Brae), both in designated Green Belt land, for housing developments.

Detail

Housing Need/Supply

It has been the clear view of several Reporters who have reviewed recent applications by Gladman Developments Ltd to seek approval for housing in Quarriers Village (Carsemeadow) and Kilmacolm (Knapps and North Denniston); and then North Denniston only) that



- They would not meet Clydeplan stipulations on Sustainability.
- Major housing development should be focused on the Clyde Corridor where there would be easy access to major road and rail transport networks.
- There is no proven need.

In 2018 when a Scottish Government appointed Reporter considered an Appeal by Gladman Developments Ltd against REFUSAL by Inverclyde Council to grant planning permission for 100 houses on Greenbelt Land at Knapps/North Denniston, which is on the Southern edge of Kilmacolm, he **dismissed** the Appeal. When he issued his decision he made a number of key points with regard to that proposal's compliance with spatial strategy for new development:

With regard to Sustainability he said "I find it unlikely that existing public transport serving Kilmacolm would be so attractive to residents in the proposed development as to reduce their use of private cars for making journeys. There is a lack of sustainable public transport in the Kilmacolm area"

He was right. The nearest train stations are 4.7 miles and 7.2 miles from the centre of the village. Bus services to Port Glasgow are infrequent. The bus ride is a 15 minute meandering journey followed by a 10 min walk (depending on age) from the Port Glasgow bus stop to the Port Glasgow station platforms, where there is a train service in either direction approximately every 15 minutes. The train journey from there into Glasgow takes 26 or 35 minutes, dependent upon whether it is the fast service stopping only at main stations, or the slow service stopping at all stations. Parking spaces at the station are limited and the walk to the platforms takes 10 minutes for fit people. Trains at Johnstone railway station are every 15 – 20 minutes. However, the bus service to Johnstone station is every 2 hours, and that bus journey takes 40 – 50 minutes !! Even with the new parking deck, it is difficult to find a parking space at the station, at any time of the normal working day.

In either case, most people living in, but working outside Kilmacolm – in Glasgow, Paisley, Greenock or elsewhere, use the car to get to their work place. *The Reporter in his ruling on the Gladman Appeal pointed out that there is a lack of local employment opportunities in Kilmacolm and said "I find that the proposed development would be highly car-dependent"*

Clydeplan seeks to focus new Development in the most sustainable locations. It sets out a vision for a compact city region that focuses on developing **Brownfield** land to meet the region's housing needs and seeks to limit extension of the built up areas. It sets out 13 Community Growth Areas (CGAs) which are a focus for new development in the region. Kilmacolm and Quarriers are **not in a CGA** and are not suitable for new large-scale development .

The Reporter examining the Gladman Knapps/North Denniston Appeal against REFUSAL of their 100 house proposal said that "Allowing housing development on Greenfield sites that have not been identified for new housing would be contrary to the vision of the compact city region and would make it more difficult to attract development to brownfield and regeneration sites. The proposed development would not accord with development plan strategy"



He went on to say *“Clydeplan sets out that in strategic terms, development should take place within specific areas, and Bishopton, a Community Growth Area, is a much more sustainable location for new development to be directed to”*

The Reporter handling the appeal regarding **Carsemeadow in Quarriers Village** had this to say:

“not persuaded that there is a shortfall in the effective supply within this area. In any event, when the evidence suggests a very healthy supply of land for housing across the Renfrewshire HSMA as a whole, it does not seem logical to seek to justify a housing development proposal on the basis that it could meet a demand arising from a small and relatively inaccessible corner of that HSMA.....”

Green Belt

Clydeplan sets out specific guidelines that any development in the Green Belt should comply with, and states that if a development should fail on any of these criteria any application should be refused. These criteria are:

- Directing planned growth to the most appropriate locations.
- Supporting regeneration.
- Creating and safeguarding identity through place-setting and protecting the separation between communities.
- Protecting and enhancing the quality, character, landscape setting and identity of settlements.
- Supporting the farming economy of the city region.
- Meeting requirements for the sustainable location of rural industries.

The Council’s Spatial Development Plan aims to limit development in the Green Belt and Countryside.

Balrossie

We note that Balrossie is excluded from the proposed Plan.

Why?

It is a Brownfield site with planning permission for 64 Dwellings.

What effort is Inverclyde Council making to identify and encourage a reliable Developer to commit to doing something there?



The Uncompleted former Kilmacolm Institute Site

We note that this uncompleted site is included in the figures for the proposed Local Development Plan. It is becoming more and more dilapidated externally and internally as the days go by, with leaks from the roof and the unsealed rear walls, and easy access for small-size wildlife.

What pressure is Inverclyde Council placing on the Developer to either complete it or sell it to a reputable Developer who will complete it? The only occupants at present are :

- The Co-op (a much needed and appreciated business). However they have to get all their electricity and water services from an adjacent functioning building that is linked to electricity and water supplies.
- A resident juvenile Jackdaw. This unfortunate bird hatched recently from a jackdaw nest in the vacant, still uncompleted ground-floor commercial premises next to the Co-op, and cannot get out. It will soon be dead.

Smithy Brae

We acknowledge that the area at the foot of Smithy Brae has been a housing development site in the Inverclyde LDP for many years. We object to the further extension of this area into the Greenbelt, which effectively eradicates one of the Greenbelt lungs into the village.

We object because:

- It is a material new encroachment into the Greenbelt.
- The extension has been added without proper consultation or inclusion in the MIRS process.
- It does not tackle the effective use of the “Brownfield” site.
- It does not in itself overcome the multiple ownership issues that are blocking the current area.

We ask that the area be reverted to the extant 2014 LDP location and that the Council consider what interventions they might make to transform the deliverability of the site.

The images below are included for clarity on the creeping incursions into the Greenbelt that have been proposed.

- **Prior to the 2014 Adopted LDP** The designated area constituted only of the land of the former Gas Works ([see image 1](#)).
- **The 2014 LDP**. When the 2014 LDP was adopted, the area was increased - as a consequence of the Reporter who examined the proposed 2014 LDP having directed that a portion of Green Belt land beyond the fence line just to the North the two (since demolished) cottages, should be released from Green Belt status to provide sufficient land for an Enabling Development of 42 dwellings to compensate a developer for the requirement to decontaminate the site of the former Gasworks ([see image 2](#)).



- **The Proposed LDP (2021).** We note that the area described as R62 is designated as a site for 42 dwellings, but [\(see image 3\)](#)
 - **The area has increased in size markedly.**
 - **It now encroaches a great deal further into the Green Belt – Northwards.**
 - **It no longer incorporates the site of the old Gas Works.**
 - **Why has this piece of land been increased in size without prior MIR consultation?**
 - **What is the intended use of the former Gasworks land?**
 - **It is Brownfield Land.**
 - **It is contaminated land.**
 - **Who is going to decontaminate it?**
 - **Is it going to be forcibly converted to a Temporary Greening site ?**
 - **Who is going to undertake the decontamination and conversion to a Greening site?**

[Image 1](#)

Site Details

Site name	Smithy Brae 3
Settlement	Kilmacolm
Call for Sites reference	054
Site size (ha)	0.37
Current use	Vacant
Existing LDP allocation	Residential Development Opportunity





[Image 2](#)

R65 – Smithy Brae, Kilmacolm



[Image 3](#)

(See page 7)



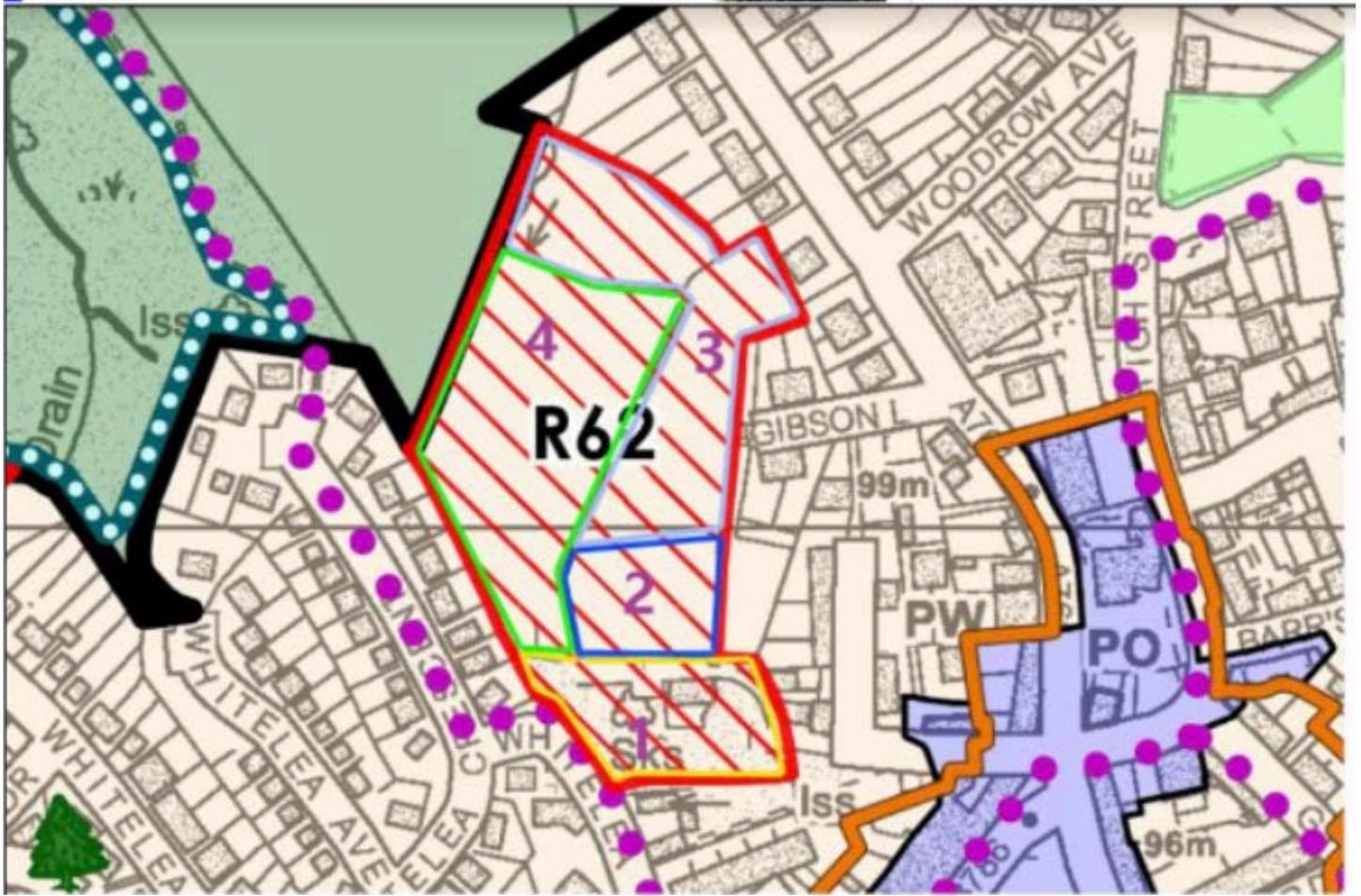
[Image 3](#)

Site Details

Site name	Smithy Brae
Settlement	Kilmacolm
Call for Sites reference	CFS09
Site size (ha)	1.91
Current use	Rough ground
Existing LDP allocation	Green belt



[We understand that Kilmacolm Estates Ltd put forward the enlarged area as a potential development site in response to the Inverclyde Council 'Call for Sites' last year \(2020\). We further understand that there are multiple affected parties with ownership interests. Is it seriously believed that 42 dwellings will ever be built on the cross-hatched land? - see the image immediately below.](#)



(Code for ownership interests)

1. = Kilmacolm Regeneration Co Ltd.
2. = A known resident of the village.
3. = A known resident of the village.
4. = Several unknown owners (present-day heirs of a deceased former owner)

Developer Contributions

We stated in our comment on Issue 22 in the Main Issues Report published in December 2020 that we have very strong views that Housing Developers must make meaningful contributions which will be of Material Benefit to Kilmacolm/Quarriers if large scale housing development is ever permitted. We trust that Inverclyde Council has taken this on board and will insist that it happens:

ISSUE 22 – DEVELOPER CONTRIBUTIONS

Question: Should the Council seek contributions from housing developers towards delivery of new community infrastructure? What other ways should the Council seek to address impacts on community infrastructure arising from new developments? Are there other infrastructure types the Council should seek developers to contribute towards?

See page 9 for our KCT Response:



KCT Response:

- We have VERY strong views on the THIRD question (Are there other infrastructure types the Council should seek Developers to contribute towards).
- If it is proved conclusively, beyond any doubt, that land has to be allocated for housing development on Green Belt land round Kilmacolm, then it must be stipulated clearly in the MIR, and the replacement Chapter 7, that it will be incumbent on any/all Housing Developers submitting formal applications to create large housing schemes, that Inverclyde Council will require such Developers to commit to a Material Benefit to Kilmacolm, and that that Benefit will be a **formal planning** requirement to commit money and to contract to:
- Creating an architecturally distinctive and high-quality **central area** in the village by:
 - Upgrading the poor-grade pavements in the heart of Kilmacolm to a standard that will complement its status as a Conservation Area, i.e. upgrade the pavements with 'natural stone' paving. The pavements to be upgraded are:
 - (1) From 'The Cross' down both sides of Lochwinnoch Rd as far as the Elphinstone Court/Cairns Cafe turning on the one side, and on the other, to the turning into Duchal Rd;
 - (2) From 'The Cross' up both sides of Port Glasgow Road as far as the steps to 'The Old Kirk' on the one side, and 'Lairds Gate' on the other;
 - (3) From 'The Cross' up both sides of Bridge of Weir Road as far as 'Moss Road'; and
 - (4) From 'The Cross' on both sides of the road named 'Market Place' as far as and including the pavement outside the shop 'Etoile'.
 - Replacing the lamp standards in the heart of the village with energy efficient, sleek modern lamp standards that are fitting for its Conservation Area designation.
 - Rationalising, removing and restyling the plethora of signage in the centre of the village.
- Outwith the centre of the village, create a maintainable substantial recreational space **within any new** major developments, for the incoming children to use, such as all-weather playing surfaces etc.
- Developers of any large scale housing in Kilmacolm and Quarriers must contribute to enhancing the facilities provided by Kilmacolm Primary School which serves both communities.

Conclusion

1. The Greenbelt around and penetrating the village is an asset that must be protected.
2. The governing principles for considering Greenbelt allocation for housing are enshrined in the Clydeplan.
3. Kilmacolm and Quarriers do not stand alone as a Sub-Market **Area**, and land supply calculations can only be carried out in the context of the whole of the Renfrewshire Sub-Market Area.
4. The whole of the RHSMA has a surplus of land supply.
5. Allocating land for large-scale housing development in the Kilmacolm or Quarriers regions is therefore unwarranted and not mathematically necessary according to the overall numbers.

Yours Sincerely,

Nicol Cameron

(Mr R.N. Cameron – Chairman Kilmacolm Civic Trust)