

**KILMACOLM CIVIC TRUST COMMENT**  
**ON**  
**2014 INVERCLYDE LOCAL DEVELOPMENT PLAN (REVIEW)**  
**MAIN ISSUES REPORT**

**INTRODUCTION**

The Kilmacolm Civic Trust Executive Committee has reviewed the 2014 LDP (Review) Main Issues Report very carefully and thank you for giving us the opportunity to comment on it. We commend everyone involved in its production for their presentation and analysis of all the facts and issues.

We generally welcome the approach adopted, especially with regard to the Green Belt within Quarriers Village and around Kilmacolm, and rejection of the numerous developer and private landowner aspirations to encroach into it in order to build large numbers of houses. We do not offer comment on all the Issues; only those that have a direct impact on our area of interest (Kilmacolm, Quarriers and the Surrounding Countryside) and cause us concern – Issues 9, 10, 12, 15, 16, 22 and 24, or certain other issues where we feel that general comment from us might be helpful.

We submit our comment in 2 parts:

- Part 1 (Annex A) - Issues that cause us concern (9, 10, 12, 15/16, 22 and 24).
- Part 2 (Annex B) - Comment on certain of the other Issues.

**ANNEX A**

**(Comment on Issues 9, 10, 12, 15/16, 22 and 24)**

**OVERVIEW**

The Kilmacolm Civic Trust (KCT) response to the Inverclyde 2014 LDP Review, and in particular detailed comment on the Main Issues Report (MIR) is given below. In responding, we wish to make the following over-arching comments that guide our detailed views.

**The principle of retaining the green zone wherever possible and utilising brown-field sites ahead of undeveloped green-field sites.** The KCT has consistently defended the Green Belt and continues to do so. Within the Kilmacolm and Quarriers Village area, there are brown-field sites with proposals for **90** houses that have yet to be taken-up (**plus a further 25 that have been formally applied for but are not yet constructed**). If the MIR calculation is correct that the area requires one hundred and thirty new homes, then logically, existing brown-field sites should be utilised before any new green zone development. This principle reflects not only KCT views but also long-declared council and national positions.

**Demonstrating the requirement.** The MIR gives a series of requirements for housing across the Inverclyde area. The figure given for Kilmacolm and Quarriers is one hundred and thirty, but the MIR does not satisfactorily demonstrate how these figures are calculated. Arguably, since there are **115** undeveloped sites in the KCT area, the demand does not exist for further development as envisioned within the MIR and future development could be much less than proposed. Any confirmed development plan should show the factors utilised in coming to proposed figures in order to secure the confidence of the local people. We expand upon this comment within our detailed response below.

**Car-parking requirement.** The KCT is clear that there is a requirement for enhanced long-term parking within the area. This requirement will increase if further housing development takes place within the area. As stated in the sub-paragraph below, priority for car-parking should be aimed at brown-field sites.

### **ISSUE 9 – ENABLING DELIVERY OF NEW HOMES**

*Question: “Do you agree that the Housing Development Strategy set out in the current Local Development Plan remains valid and should be carried forward into the new Plan?”*

We support aspects of the current local development plan, which states: “the GCV HNDA and GCV SDP demonstrate that there is no justification for major housing development in this Sub Housing Market Area” namely, Kilmacolm and Quarriers Village. We particularly support the commitment to maximise any new building on urban brownfield sites.

However we have serious concerns about the calculation of demand, specifically the need for 130 new houses in the area in the planning period, (up from 120) and the supposed requirement for 52 houses in the first period of the plan and another 52 later. We would like to see a more robust explanation of how these figures are arrived at and how it relates to the previous plan.

We are concerned that the number of homes projected for Kilmacolm seems to be the result of a convoluted calculation which involves a demographic model, that predicts less housing is actually required, overlaid by Inverclyde Council’s aspiration for increased population in Inverclyde. It appears that the ‘required housing’ figure for the Renfrewshire Sub-Market area is the result of an accounting adjustment, i.e. simply a number to balance out allocations for the Inverclyde and Renfrewshire housing areas.

We are also very concerned that the assumed implementation rate for the projected requirement is flawed. The rate of completions in recent years has undoubtedly been slow, unsurprisingly, given political and economic uncertainty. However the calculations in tables 8, 9, and 10 of the Housing Background Report do not take into account some 20 homes that are already under construction or due to start in the near future. This means that the projected rates of completion are flawed, and these assumptions should therefore not be used as a basis to accelerate the release of Green Belt land for 52 homes under Option 1 or Option 2.

The model-based approach also fails to address the particular demographic of Kilmacolm, with its higher than average population of elderly residents, many of whom require suitable accommodation, close to the village centre. Their needs would not be addressed by 4 and 5 bedroom villas on the outskirts of the village.

It is also self-evident that the pre-emptive release of more attractive Green Belt land for housing, will further delay development of the existing sites.

The assumptions of housing need are based on data to which we don’t have direct access. However we are aware of the potential impact of such an influx on local services, particularly traffic and schools, and we would urge Inverclyde Council to prepare a village impact report and to issue a mitigation plan that the Council will commit to.

## **ISSUE 10 – HOUSING LAND SUPPLY (KILMACOLM AND QUARRIERS VILLAGE)**

*Question: Which of the listed options do you support for addressing housing land supply issues in Kilmacolm and Quarriers Village, or do you have an alternative approach to suggest? Please give reasons."*

We note that a total of 16 sites have been put forward by developers and landowners for house building; and that the vast majority are in the Green Belt.

For the reasons listed above, we dispute the Council's proposal that land should be released from the Green Belt for construction of 52 houses in the period to 2024; and that another release of Green Belt land will have to be made for a further 52 houses to be built in the period 2025 – 2029. We note that the Council's preferred option is to release Green Belt land to the west of Quarry Drive; or alternatively release land at Planetreeyetts. We object to both sites as the 'need' has not been satisfactorily demonstrated.

### **Comments on the 16 sites generated by the 'Call for Sites'**

**Site 001** (Carsemeadow, Quarriers) – proposed for 100 houses.

We oppose this proposal.

- Any development here would completely destroy the open-space character of the southern part of Quarriers village.
- This number of homes would impose a severe strain on the already limited local amenities

**Site 002** (North Denniston) – proposed for 60 houses.

- We oppose this proposal.
- Any development here would destroy the unique agricultural character of the view into Kilmacolm as seen from the old railway/now cycle track, the southern (A761) approach into the village from Bridge of Weir, and from the B788 from its junction with the A761 until it passes under the cycle track. It is also the start of the green lung of agricultural land that extends all the way into Kilmacolm on the west side of Gryffe Road right up to Lochwinnoch Road. Furthermore, it would deny all use of the field between the B788 and the old North Denniston Farm by large flocks of migrating Barnacle and Canada geese that use it every year as a staging post on their southerly and northern migration routes; flocks of 200 to 300 birds always land and graze there for several weeks each autumn and spring before moving on again, and it is a delight to see them.

**Site 003** (Knapps Loch) – proposed for 110 houses.

- We oppose this proposal.
- This is an enormous 'land-grab' which is 6 times the size of any previous proposal for land east of the A761 which has always been limited to what is known as 'the Guy Fawkes bonfire' field. A housing development here would destroy the unique character of the 'southern gateway' approach into Kilmacolm which has a very defined border – the southern boundary of the main conservation area – consisting of fine houses overlooking the agricultural land leading down to the loch. It would also deny the use of the northern part of the land for the annual Guy Fawkes bonfire night; and deny the use of an extensive part of the western half for parking and equestrian events at the annual Kilmacolm and Port Glasgow Agricultural Show. Both these events are well-attended across the community, so not only would the loss of this amenity be keenly felt, they would be difficult to restage elsewhere.

**Site 009** (The Police Station Field).

- We oppose this proposal.
- It calls for an enormous piece of ground (twice the size of all previous proposals) to be released from the Green Belt for housing (50 – 100 houses): not only ground on the east and west side of the driveway through the woods to Duchal House, much of which is mature multi-species woodland, and a SIN; but now also a considerable acreage of grassland, used for grazing, extending west from the driveway, round the southern side of the Pacemuir housing estate then upwards to an agricultural gate onto Lochwinnoch Road. We have consistently argued against any form of housing in this part of Kilmacolm and continue to do so. The proposal is philistine vandalism! The eastern half is part of the southern green lung that extends into the heart of the village and gives it such an attractive character. Developing housing here would destroy that and deny many people the pleasure that they derive from walking and meandering through the woodland or across the field to gain access to it from the St Columba's School Astroturf sports pitches. Turning the lovely pastureland which is grazed by cattle, south of the Pacemuir estate into housing would destroy the very distinctive boundary and western gateway approach into Kilmacolm. Much of that land is totally unsuited to housing: as it is very low lying, and boggy throughout most of the year, and becomes flooded frequently during extended periods of rain and snow during the winter months when the River Gryffe surges with water from its many sources running into it from the moorland further up the Gryffe valley. Finally, the two fields to the west of the road through Milton woods are much enjoyed by dog walkers from that part of the village who use it as part of a circuit.

**Site 010** (The ARP Field).

- We oppose this proposal.
- So far as we can recall no developer has ever before suggested that the grazing pastureland behind and around the old ARP station and extending up to Mount Blow, should become a housing development site. Now CALA Homes wish it to be released from the Green Belt so that they can build circa 100 houses there. It is an unacceptable and opportunistic incursion into the lovely Green Belt that surrounds Kilmacolm. It would destroy the beauty of the western B786 approach into the village from the direction of the war memorial. It would destroy the integrity of the very distinctive and attractive south west boundary of the village. It would introduce a sprawl of housing west of the river Gryffe, which would destroy the lovely and unique views towards the Renfrewshire hills, as seen and enjoyed from Birkmyre Park and by the properties along Hazelmere Road.

**Site 013** ('The Plots' on Port Glasgow Road).

- We oppose this proposal.
- This is yet another attempt to achieve release of land from the Green Belt on the west side of Port Glasgow Road for house-building. If permitted, it would result in strip development on that side of the road, initially filling the gap between the 2 detached houses opposite the junction of Wateryetts Drive/Port Glasgow Road and the line of bungalows that ends opposite the footpath that leads up to the southeast end of Hillside Avenue. That would inevitably encourage attempts to achieve release of more Green Belt land to the immediate northwest of the 2 detached houses, leading to more strip development. Furthermore, it would encourage attempts to achieve extensive release of Green Belt land between port Glasgow Road and the old railway (now cycle track) for a mass housing development. That would further destroy the characteristic green lung that extends right into the heart of Kilmacolm from the north – the southern boundary of which was moved substantially to the north in 2014 as an outcome of a Scottish Government Reporter's conclusion when he reviewed objections to the proposed 2014 LDP: the logic of which was that it would permit a development of 42

housing units to 'enable' the removal of toxicity from the site of the old Gasworks at the foot of Smithy Brae. So far, no coherent planning application has been submitted to build the 42 houses; and no toxicity has been removed! The Kilmacolm Civic Trust has consistently opposed all attempts at release of Green Belt land on the west side of Port Glasgow Road and continues to do so for the reasons given above.

**Site 016** (Stables Wood). Proposed for 10 houses.

- We oppose this proposal.
- This is opportunistic, and unjustified. The concept of the original Auchenbothie development was that it would 'enable' the saving and renovation of Auchenbothie House which is B Listed and was in a serious state of collapse. That was achieved. The Auchenbothie development is an isolated location some 500 metres from the main settlement of Kilmacolm. One of its characteristics is its multi-species woodland setting. The proposal would destroy much of the western part of the woodland. We see no reason why this should be allowed.

**Site 017** (Craigmarloch 1: proposed for 4 houses)

and

**Site 018** (Craigmarloch 2: proposed for 25 houses)

- **History:** There was a private application in 2015 to build 2 houses (Planning Application 15/0209/IC) on ground now designated as Craigmarloch 1 in the MIR. We objected to it because the existing settlement of 4 dwellings on that part of Port Glasgow Road is an isolated location in the Green Belt lying half way between Auchenbothie – which is itself isolated – and Port Glasgow; the proposal to erect 2 x 'new build' houses in the garden grounds of one of them because the owner considered the grounds to be unmanageable and expensive to maintain was not a convincing argument; there are no existing agricultural structures or remains of agricultural structures on the two proposed 'plots' to modify/develop into housing; the property is not part of any agricultural farm or estate associated with Craigmarloch, nor is there a demonstrated need to provide housing for staff/workers associated with such a business. Inverclyde Council refused the application. The applicant appealed. The Inverclyde Review Board threw out (refused) the appeal.
- **Site 017 (Craigmarloch 1).** Now a private developer proposes that 4 houses be built on the same piece of ground. We continue to object. There is no justification for enlarging the existing small, isolated, settlement.
- Taking **Site 018 (Craigmarloch 2)** into account, which proposes 25 houses to be built on countryside pastureland between the existing Craigmarloch settlement, and the isolated house and logging business 'South Craigmarloch' under the 440kV powerline 500m south of Site 017, the combined outcome would be an isolated strip development of a total of 34 houses on the west side of the A761 Port Glasgow road. That would destroy the attractive rural appearance of this piece of countryside; it would be isolated – and neither a part of Kilmacolm nor a part of Port Glasgow; and if permitted would encourage future attempts at encroachment into this part of the countryside resulting in continuous strip development ultimately linking Kilmacolm and Port Glasgow. We do not want the unique, attractive nature of the village of Kilmacolm to become a continuous sprawl of housing along the west side of the A761.

**Site 008** (Tathieknowe, West Glen Road). Proposed for construction of 1 – 2 houses.

- We support this proposal – with reservations.
- Tathieknowe is an isolated property on the eastern edge of Kilmacolm, just south of the main West Glen Road that connects with Barochan Road (B789) which leads down to Langbank. The proposed development is within the policies of Tathieknowe house, rather than conventionally recognised Green Belt land. It is set in woodland opposite the Hydro pond - the outflow of which runs through the grounds of Tathieknowe as a small stream. The property overlooks a large expanse of agricultural pastureland to the east, used for grazing and a gorse covered rocky knoll (see the lower right quarter of the image below). We do not object to this proposal **provided** that the mature trees which form a distinctive defining edge to this part of Kilmacolm are retained.



**Site 047** (North side of West Glen Road). 15 houses (Council Estimate).

- We oppose this proposal.
- **History:** This site was proposed for the 2014 LDP (it was Site 37 in the LDP “Post Main Issues Report Additional Suggested Development Sites Consultation”). We objected to it strongly on the grounds that it was large enough to accommodate either one large house, or several houses of moderate size; that if permitted it would constitute the start of ribbon development; and would set a precedent that would lead to successive applications to build on green field land in this area of the village on the opposite (southern) side of West Glen Road, extending north-eastwards from the small bridge over the burn that comes out of the Hydro pond development, to a point opposite that proposed Site 37, or even beyond.
- We continue to oppose development on what is now designated as Site 047 – for the very same reasons.
- **Correction of an error in the 2014(Review)MIR site details for Site 047.** We note that against the subheading ‘Cultural Heritage’ there is the statement ‘*Site very close to Kirkbrae House which is a scheduled monument*’. We are not aware that there is such house/monument in Kilmacolm. We believe that Kirkbrae House is in fact somewhere near or in Inverkip.

**Site 011** (South side of West Glen Road). Proposed for approximately 60 houses.

- We oppose this proposal.
- **This piece of ground was proposed by a developer many years ago.** We opposed it then. We oppose it now. It is an unnecessary encroachment into lovely countryside. The land is very attractive agricultural pastureland grazed by cattle. Many people in the village enjoy walking across this piece of land on a circular route from the gate on West Glen Road: to reach the Glen Moss SSSI (known as ‘The Moss’) and the numerous footpaths that lead outwards into the countryside from the area of the Moss, and back into the village via Houston Road or Gowkehouse Road (or in the reverse direction). The eastern boundaries of Tathieknowe and Overton (C Listed) form a clean defined border to this part of the village. Development on Site 011 would extend the eastern border of the village, spoil a walking route, create contaminated run-off from rain and snow melt into the SSSI, and in due course lead to property developer aspirations to build on green field land lying immediately to the south of the site: which again was proposed by a developer many years ago – and which we opposed.

**Site 054** (Smithy Brae 3). Proposed for a Care Home.

- We support this proposal with reservations.
- **History:** As a result of a Scottish Government Reporter’s Inquiry prior to adoption of LDP 2014, a considerable encroachment into the Green Belt lung that extends into the heart of the village from the north was authorised and the boundary was moved north from its original defined border (the edge of the old gasworks site) to a line extending horizontally westwards from Gibson Lane to a point on the eastern side of the houses on Whitelea crescent near where the cycle track enters the village. This was to be an ‘enablement’ device to encourage a development of 42 houses, which would ‘enable’ the developer to clean up the contaminated area of the old gasworks. No de-contamination has taken place (though the gas works site has been cleared) and no application for 42 houses has been submitted. Prior to that there had been an application (approved by Inverclyde Council some years ago) to construct 21 flats and 2 houses on the old gasworks Brown field site. The Kilmacolm Civic Trust supported that but it never happened because the developer became insolvent.
- We support this new proposal to construct a care home on the ground of the Brown field gasworks site. Significant conditions should be imposed:
  - (1) The ground must be decontaminated.

- (2) The developer must ensure that the project does not materially increase the parking 'load' on the village by creating sufficient capacity for the care home, employees and visitors. The developer must landscape the 'village drying green' which has become overgrown and unattractive, rather than a pleasant amenity. (See the OS 1912/1914 street plan map for Kilmacolm)

**Site 012** (Migdale, Finlaystone Road). 5 houses proposed

- We oppose this proposal.
- It would be a bizarre extension of the existing northern boundary of Kilmacolm to a point much further up Finlaystone Road. Currently there is a very well-defined, logical boundary: the road to the house 'Old Hall'. It would be an encroachment into the Green Belt. It would probably lead to subsequent aspirations to get more Green Belt land released (i.e the large pastureland grazing fields extending both east and north, with well-defined stane-dyke eastern walls) to link up with the woodland surrounding the 2 isolated houses (and the very dilapidated corrugated iron clad barn at Migdale) 500m further north of the current boundary.
- The image below illustrates the points just made (barn is the isolated pair of red-roof buildings at top of large field).



**Site 014** (Planetreeyetts – land west of Finlaystone Road). 100 – 150 houses proposed.

- We oppose this proposal.
- It is another enormous, and unjustified, 'land-grab' attempt at encroaching into the Green Belt and not a new proposition. We opposed it when it was proposed for the 2014 LDP.
- The current northern boundary of Kilmacolm on this part of the west side of Finlaystone Road is well defined.

The land proposed for housing is attractive agricultural grazing pastureland. It presents a pleasing rural aspect to the west of Finlaystone Road as one leaves the village, and a lovely 'open-space' vista between the existing edge of Kilmacolm and the distinctive isolation and peaceful appearance of the Kilmacolm Cemetery. Development here would ultimately lead to attempts at further housing development up to the boundary of the cemetery. That would be a great shame for the current generation, and for past generations, if permitted.

**Site 015** (West of Quarry Drive, Kilmacolm). 200 houses proposed.

- We oppose this proposal.
- It would be a huge encroachment into the Green Belt. It also is not a new proposition for this part of Kilmacolm. We opposed it when it was proposed for the 2014 LDP.
- This 'land-grab' for housing would envelop the Kilmacolm Cemetery, destroying its tranquil isolated position with its lovely views out to the Renfrewshire Hills and across the open agricultural grazing pastureland down to the edge of the village. Furthermore, if permitted, it would lead to subsequent attempts to extend eastwards as far as Finlaystone Road for more housing.
- A development of **any** houses on this site is totally unnecessary, and an application for 200 should not be entertained.

#### **KILMACOLM CIVIC TRUST CONCLUSION AND RECOMMENDATION (ISSUE 10)**

- The Kilmacolm Civic Trust is opposed to all the proposed releases of Green Belt land.
- As we have requested earlier in this paper, Inverclyde Council must revisit their logic and calculations which lead them to conclude that new land must be released for 52 houses.
- The Kilmacolm Civic Trust strongly urges that in the event that **any** new, multiple housing is built, there must be a benefit to the village.
- **Schools** Inverclyde Council must be aware that additional places in the local Junior and Senior Schools will be required to meet the increased number of places that will be needed for the **existing** population when Bridge of Weir ceases to accept new pupils from Kilmacolm. There will be an inevitable increase in the child population that will occur when existing development opportunities are realised (115 housing units in Kilmacolm and Quarriers Village).
- **Car Parking in the centre of Kilmacolm.** There is already a problem with short-stay and long-stay car parking in the village. Additional car parks are required in the centre of Kilmacolm, and we discuss this under Issue 24.

## **ISSUE 12 – AFFORDABLE HOUSING POLICY**

*Question: Which of the listed options do you support for the Affordable Housing policy, or do you have an alternative approach to suggest? Please give reasons.*

**The Kilmacolm Civic Trust supports Option 1** : seek a 10% affordable housing contribution from all private sector housing sites with a capacity for 20 or more dwelling (instead of the current unsuccessful 25% policy).

## **ISSUE 15 – DELIVERING HEAT AND ELECTRICITY**

*Question: Do you agree that the approach to renewable energy developments and energy efficiency in new developments in the current Local Development Plan and associated Supplementary Guidance remains valid and should be carried forward into the new Local Development Plan?*

The Kilmacolm Civic Trust agrees the approach. However we strongly resist further attempts to introduce concentrations of large industrial size wind turbines into the beautiful rural landscape of the Upper Gryffe Valley – the place for them is offshore development where landscape quality, energy infrastructure and weather make such development appropriate.

## **ISSUE 16 – HEAT NETWORKS**

*Which of the listed options do you support for Heat Networks or do you have an alternative option to suggest? Please give reasons.*

The Kilmacolm Civic Trust supports Option 1.

## **ISSUE 22 – MANAGING FLOOD RISK AND DRAINAGE**

*Do you agree that the approach to flooding set out in the current Local Development Plan remains valid and should be carried forward into the new Plan?*

The Kilmacolm Civic Trust agree that the approach set out in the current LDP should be carried forward into the new Plan.

On a local level, we ask that the appropriate department be instructed to do a detailed examination of the drainage arrangements on the stretch of Port Glasgow Road between Gibson Lane and Wateryetts Avenue. The drainage scheme is clearly inadequate. During prolonged periods of heavy rain or snow-melt that stretch of road floods frequently. The water takes the line of least resistance (downhill) until it reaches the bungalows on the south side of Port Glasgow Road just north of Gibson Lane. It then floods over the kerbside and into the grounds and cellars of the bungalows which lie at a lower level than the road surface. A similar examination is required for the stretch of road between Castlehill Road and Whitelea Road. It floods frequently with deep water extending halfway across the carriageway.

## **ISSUE 24 – KILMACOLM VILLAGE CENTRE PARKING**

*Question: Do you think that there is a need for additional long stay car parking capacity in Kilmacolm? If yes, which of the proposed sites are suitable and why? Do you have an alternative approach to suggest?*

We are pleased that Inverclyde Council have taken note of our submission (our letter dated 24<sup>th</sup> June 2016) on potential additional public car parks in Kilmacolm in response to the Local Development Plan 2014 (Review) 'Call for Sites' and have included all 4 sites as Issue 24 in the Main Issues Report

For many years there has been a demonstrable need for additional Long-Stay parking in Kilmacolm. Currently there are only 3 official parking areas:

- Market Place/Barr's Brae                      11 spaces (of which 1 is for disabled parking)
- Behind the Community Centre              59 spaces (of which 6 are for disabled parking)
- Station Road                                      10 spaces (of which 1 is for disabled parking)
- **Totals**    **80 spaces (of which 8 are for disabled parking)**

This in effect provides parking for only 72 vehicles. It is noticeable that the 8 disabled parking spaces are very seldom used.

### **KCT Parking Survey**

Long-stay parking for only 72 vehicles in the whole of the centre of the village is totally inadequate. We conducted a survey on Wednesday 10 May 2017 of all the business premises in the centre of Kilmacolm. The Chairman personally visited each manager of each business and asked how many of their staff who are on duty at any typical shift time during the course of normal working hours Monday to Friday, and Saturday mornings, have to drive to Kilmacolm to get to work because they do not live in the village. The survey revealed that 87 cars owned by business staff come into the village every working day.

The findings of the survey are in **Annex C**. It does not include the staff of St Columba's senior School, as those who have to use a car all park within the school campus, on Gryffe Road, Duchal Road and Moss Road.

### **KCT Photographic Survey of Car Parking**

The Chairman also conducted a photographic survey of the Cargill Centre and Station Road public car parks, and of the short-stay parking on Lochwinnoch Road between 0900 – 0930 hours on Monday 8<sup>th</sup>, Tuesday 9<sup>th</sup> and Wednesday 10<sup>th</sup> May. This revealed that by 0930 all parking spaces were occupied.

The photographs from the photographic survey are **at Annex D**.

By the time that non- business folk arrive who want to use the facilities in the village (e.g visit the dentist, doctor, shops, café etc) or participate in activities taking place in the Community Centre, all 3 public car parks are full. So where are these people to put their vehicles? In desperation they park wherever they can find a place to do so in the nearby streets, or if they fail to discover a place reasonably close by they give up and go away.

A summary of the activities that take place in the Community Centre each day is **at Annex E**. The Cargill Centre supervisor says that the busiest days are Tuesday and Wednesday mornings when some 80 people turn up for activities in the Centre.

### **Civic Trust Review of our Long-stay parking proposals.**

We reviewed our proposals to resolve the car parking problem at our monthly Committee Meeting on 11th May 2017. We have the following observations on them as they appear in the MIR:

#### **Parking Behind the old Police Station**

- **We withdraw this option on safety grounds.** As we stated in our letter dated 24<sup>th</sup> June 2016 *"We do not think that this is a good option because it will present a safety problem to school children (and parents with prams and/or toddlers) walking to and from Kilmacolm Primary School and St Columba's Junior School at various times of the school week. They would have to pass the entry/exit point to a car park at that location. It would be uncontrolled, and it is highly likely that a careless or thoughtless driver who is in a hurry or not looking properly would drive into somebody on the pavement, crossing or about to cross at that point"*.

#### **Smithy Brae 1 and Smithy Brae 2**

- **We withdraw these options too: on safety grounds.** The Smithy Brae un-adopted track, and the footpath that connects it with Whitelea Court is used by parents taking their children to and from Kilmacolm Primary and St Columba's Junior schools. Introducing public car parks at the foot of Smithy Brae would present a hazard to these pedestrians (by thoughtless or careless drivers). Furthermore that problem would be exacerbated when the Old Institute residential development (11 housing units) is completed, and further exacerbated when new housing (42 units) is constructed on the Brownfield site the foot of Smithy Brae - on the old gasworks and the authorised 'enabling development' encroachment into the Green Belt.

#### **Undeveloped Land at the junction of Moss Rd/Gillburn Rd**

- **This is our immediate priority site.** It will not solve the entire parking problem but it will at least be a step towards alleviating it. Once the ground is cleared of self-seeded trees and bushes, and is levelled and properly surfaced with appropriate material, there is ample space here for 24 vehicles, based on the measurements of the parking bays behind the Cargill Centre. This could be achieved at relatively low cost and quite quickly. People working in the business community would be happy to use it and walk 400 or so metres to their places of work. A sketch of a potential car park layout is contained in Annex F.
- The MIR states under the heading **SEA Topic** *"Potential to deculvert watercourse within the site. Potential flood risk from watercourse"*. **Please note that there is no watercourse running either through or under the site.** The Gill burn runs down its natural watercourse and goes unimpeded, with no channelling, past the eastern end of the proposed site and at a lower level than the ground within the site. See Annex F.

#### **NEW PROPOSAL**

**We now have a new and much better proposal. It is modelled on** The Renfrewshire Enterprise HQ on Causeyside Street, Paisley who have installed a parking deck in the courtyard behind the building façade.

**Our new proposal is to have a similar sort of parking deck installed above the existing public car park behind the Kilmacolm Community Centre.**

Please see the images below taken by a member of our committee on 16 May 2017. Also see a plan, below the images, that another member of our committee has drawn that indicates the area of parking that could be added - with an access off Bridge of Weir road. Spaces are shown as 5.5 x 2.5m and there is an access of 5.5m width for cars to travel in two directions. There is of course an opportunity to form a ramp from within the existing car park area to get between decks but this would mean losing some parking on both levels to accommodate it. A parking/roads engineer would be able to resolve the best solution to fit the space available.

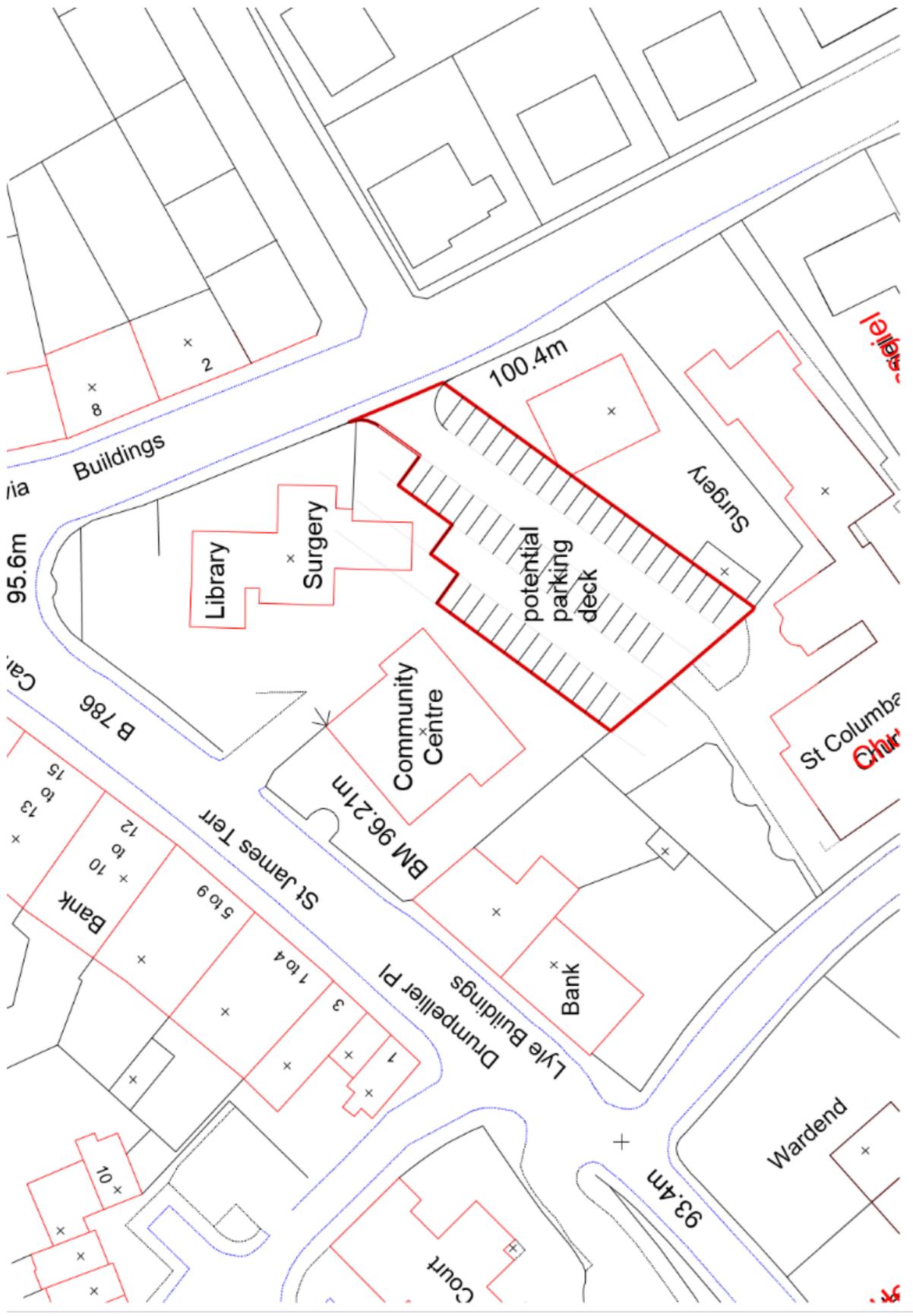
**A simple car parking deck formed in steel frame with concrete infill would be an ideal solution to add over 50 spaces to the existing council car park.** As well as being in the right location where people want to park, this area has lighting/power, drainage and is in the Council's ownership. There are no domestic properties overlooking this area. An example of this sort of deck can be seen in Paisley behind Renfrewshire Enterprise HQ. It was added to resolve a similar problem a few years back.











## ANNEX B

### Comment on other Issues in the MIR

#### ISSUE 1 – SUSTAINABLE DEVELOPMENT STRATEGY

*Question: Do you agree that the Sustainable Development Strategy set out in the current Local Development Plan (LDP) remains valid and should be carried forward into the new Plan?*

KCT response: YES

- **Policy SDS 1** – promotes reduction of greenhouse gas emissions and adaptation to climate change by improving energy efficiency of buildings; achieving renewable energy targets; assisting the move to zero waste; protecting carbon sinks; encouraging sustainable forms of travel.
  - We support this. However we strongly resist further attempts to introduce concentrations of large industrial size wind turbines into our beautiful rural landscape – the place for them is offshore development where landscape quality, energy infrastructure and weather make such development appropriate.
  
- **Policy SDS2** – promotes the safeguarding and enhancement of sustainable forms of transport; and integrated transport system; management of the road network; and directs new development to locations accessible by a choice of transport options.
  - We support this.
  
- **Policy SDS3** – promotes high quality place making in all new development by having regard to Inverclyde’s historic urban fabric, built cultural heritage and natural environment.
  - We support this. However we strongly resist all attempts by landowners and putative housing building developers to have green field land and pockets of Green Belt land released for housing development when there are existing unused Brownfield sites and unused Greenbelt releases within the existing 2014 LDP that have not been taken up yet.
  
- **Policy SDS4** - promotes the safeguarding and enhancement of green network routes, and the embedding of the green network into new development.
  - We support this.
  
- **Policy SDS5** – states a preference for all appropriate new development to be located on previously used (brown field) land within urban settlements.
  - We strongly agree. Additional Greenfield/Green Belt land should only be released if there are no viable brown field sites and there is a **proven** need for housing. There are currently several allocated Brown field/already released Green Belt sites in the current LDP not yet developed in Kilmacolm, sufficient for 90 dwellings. Incentives should be offered to entice developers to build on them – i.e Balrossie (40), Smithy Brae (42 or proposed care home), Leperstone Ave (8). Furthermore, planning permission has been granted for, but the housing is yet to be built at: The Old Institute (11), Whitelea Rd (4), Quarry on Port Glasgow Rd (1), Avenel (2); and in Quarriers Village there is 1 x site: Woodside Care Home, with an application to convert it to 7 housing units, but no work started.
  
- **Policy SDS6** – promotes and safeguards Inverclyde’s 3 town centres.
  - We support this.
  
- **Policy SDS7** – directs new investment and development to the Waterfront and the Council’s renewal areas.
  - We support this.

- **Policy SDS8** – presumes against the spread of the built-up area into the Green Belt and sporadic development in the Countryside.
- We strongly support this.

## **ISSUE 2 – MAJOR AREAS OF CHANGE, POTENTIAL CHANGE & DEVELOPMENT SITES**

- **MAPS 1 – 10.** Regeneration sites.
- Do not affect Kilmacolm/Quarriers.
- No comments offered.

## **ISSUE 3 – CENTRAL EAST GREENOCK**

- **MAPS 11 – 12.** Regeneration sites.
- Do not affect Kilmacolm/Quarriers.
- No comments offered.

## **ISSUE 4 – PROMOTING TOWN CENTRES**

*Question: Do you agree that the approach to Town Centres and Retailing set out in the current LDP remains valid and should be carried forward into the new Plan?*

**YES.** Particularly the strategy for Port Glasgow (offering large format food and non-food shopping which draws shoppers from across Inverclyde); and the strategy for promoting small-scale retailing to meet local needs in 9 Local Centres (one of which is Kilmacolm).

## **ISSUE 5 - GREENOCK TOWN CENTRE**

- Does not affect Kilmacolm/Quarriers (apart from trying to find somewhere to park).
- No comment offered.

## **ISSUE 6 – SUPPORTING BUSINESSES AND EMPLOYMENT**

*Question: Do you agree that the approach to economy and employment set out in the current LDP remains valid and should be carried forward into the new Plan?*

**YES.** We commend the achievement of support from the City Deal £1.13 billion infrastructure fund for 3 large scale projects in Inverclyde.

## **ISSUE 7 – SPANGO VALLEY**

- Does not affect Kilmacolm/Quarriers
- No comment offered.

## **ISSUE 8 – PORT GLASGOW INDUSTRIAL ESTATE**

- Does not affect Kilmacolm/Quarriers
- No comment offered.