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18th December 2018

Dear Sir,

18/0322/IC Land at Planetreeyetts, Kilmacolm – Proposed residential development of circa 100 units including 25% affordable and associated infrastructure, landscaping, and open space

Kilmacolm Community Council provides its response to the Taylor-Wimpey application for Planning Permission in Principle for a substantial residential development at Planetreeyetts, Finlaystone Road, Kilmacolm and the moving of the existing green belt boundary.

Introduction

The Kilmacolm Community Council having reviewed the application and giving consideration to the views of the community it represents are opposed to the planning application.

We note that the proposal is contrary to the Inverclyde Council Local Development Plan 2014 and the 2018 proposed Inverclyde Local Development Plan). Of special concern is the applicant's disregard for the Green Belt designation, which was stated in the Local Development Plan 2014 in Policies ENV2, RES7 and SDS8 and Policy 14 of the 2018 Proposed Local Development Plan.

We have studied the applicant's submissions and supporting evidence in detail, and have observations which are set out below.

Many Kilmacolm residents thought that the pre-application consultation was deliberately timed to frustrate genuine engagement. The timing of this planning application, which falls over the Christmas Holidays and recess of the community council, has imposed tremendous additional effort on community council members and the various community organisations which are also opposed to the development.

The application is discussed under the following headings:

- Local Development Plan
- Housing supply/Effective housing site
- Green Belt
- Roads and Public Transport
- Biodiversity

Local Development Plan

Inverclyde Council, after extensive consultation with the community and with developers and landowners, published a Local Development Plan in 2014 that considered and rejected the site proposed for development in this application.

Kilmacolm Community Council and others from the local area made extensive contributions to the Local Development Plan process carried out by Inverclyde Council. We believe that the current Local Development Plan 2014 and the 2018 Proposed Local Development Plan have taken consideration of the local needs, and of local communities' comments. At each stage the Local Development Plan process has evaluated the housing needs and options and has repeatedly considered and rejected the site presently proposed.

The community council does not oppose developments without particular reasons. Brownfield and infill sites have, in the past, been proposed and granted permission, within the settlement boundary and in the wider Kilmacolm area.

There are currently some 137 housing units for which planning permission has been granted with two more sites in the village which are in the public consultation stage and awaiting the submission of planning applications. Additionally, there are currently 41 houses for sale on the open market in Kilmacolm the uptake of which has been very sluggish with many of the sellers having to lower their prices in order to gain a sale. The applicants view, that this a highly marketable area, is not borne out by the sales figures.

Housing supply/Effective housing site

We strongly support the Local Development Plan in directing the bulk of the housing allocation for the Inverclyde area to the "core area" where infrastructure such as schools can be provided efficiently, and where sustainability goals can be met, for example by avoiding reliance on private cars and road transport generally.

The types of housing needed by the community, according to the Local Development Plan are very specific:

- affordable housing,
- shared ownership housing and
- housing adapted or adaptable for the elderly/disabled.

With regard to elderly/disabled housing, this should be bungalows and other accessible units adapted to the elderly and infirm, and to changing requirements. The provision of such units to which existing residents can "downsize" would free up the existing housing stock over time, and contribute greatly to sustainability.

The application for "planning permission in principle" is in no position to address these needs, and certainly does not have these needs as a priority. Any promises that would be made in connection with this application would be worthless, being given only in the interests of breaking Green Belt and opening the door to whatever development is most profitable on this and other sites.

The community council is not against the provision of additional housing, of appropriate types and in appropriate locations if it is deemed necessary to meet the 5-year effective supply. However, we believe that we do have an effective 5-year supply in Kilmacolm and Quarriers and even the applicant has stated in paragraph 2.3 of their Design Statement **“Whilst there is not a shortfall in the 5-year effective supply within the Renfrewshire Sub Market Area”** and then go on to try to justify the building of 100+ units at this site because there is a shortfall in the Inverclyde Council area.

There are currently two other planning applications that are in advanced stages of consultation. The site at the Knapps and North Denniston is with the Scottish Government appointed Reporter awaiting a decision and the Site at Carsemeadow in Quarriers is awaiting a pre-determination meeting in January. In addition, an application for 64 units in the Old School at Balrossie has been granted planning permission.

The community feels that it is under attack from developers even though there is not a shortfall in the 5-year housing supply in Kilmacolm and Quarriers. It seems that it is easier to try to get Greenbelt land than it is to develop Brownfield sites available in Inverclyde.

Green Belt

The proposed housing development is in the Kilmacolm Green Belt, which should be sufficient to ensure that the application is rejected without further discussion. Development within Green Belt should be allowed only under exceptional circumstances. None of the exemptions associated with Green Belt policy applies in this case. Neither can a landowner’s desire for profit be considered exceptional. The community council is adamant that the Green Belt must be respected at all costs.

To allow such an application against the Green Belt designation would set a dangerous precedent. Only by rigorous defence of the Green Belt have the aims of the plan and the character of the local area been protected from rabid development. If one development such as this were to be allowed, in violation of the Green Belt and the Local Development Plan, more applications will follow.

Several policies in the Local Development Plan 2014 are associated protecting the Green Belt and these include SDS8, ENV2, RES7 also Policy 14 of the 2018 Proposed Local Development Plan.

SDS8 states that There will be a presumption against the spread of the built-up area into the designated Green Belt and careful management to prevent sporadic development in the designated countryside.

As this application is for a development in the currently designated Green Belt it should be refused.

ENV2 states that “Developments in the Green Belt will only be considered favourably in exceptional or mitigating circumstances, while developments in the countryside will only

be considered favourably where it can be supported with reference to the following criteria:

- (a) it is required for the purposes of agriculture, forestry or, where appropriate, renewable energy (refer Policy INF1); or
- (b) it is a recreation, leisure or tourism proposal which is appropriate for the countryside and has an economic, social and community benefit (refer to Policy ECN6); or
- (c) there is a specific locational requirement for the use and it cannot be accommodated on an alternative site (refer Policies INF3 and INF7); or
- (d) it entails appropriate re-use of redundant habitable buildings, the retention of which is desirable for either their historic interest or architectural character or which form part of an establishment or institution standing in extensive grounds (refer to Policy RES7); and
- (e) it does not adversely impact on the natural and built heritage, and environmental resources;
- (f) it does not adversely impact on landscape character;
- (g) it does not adversely impact on prime quality agricultural land;
- (h) it does not adversely impact on peat land with a high value as a carbon store;
- (i) it does not adversely affect the visual amenity of the area and is capable of satisfactory mitigation;
- (j) there is a need for additional land for development purposes, provided it takes account of the requirements of the Strategic Development Plan; and
- (k) it has regard to Supplementary Guidance on Planning Application Advice Notes.

We feel that this application does not meet criteria (a) to (f) and (i) and (j).

Policy RES7 – Residential Development in the Green Belt and Countryside States “The development of new dwellings in the Greenbelt and countryside, as identified on the Proposals map, will only be supported if the proposal is for either:

- 1. A single or small group of dwellings not adjoining the urban area;
or**
- 2. The conversion of redundant non-residential buildings, that are for the most part intact and capable of conversion for residential use without recourse to substantial demolition and rebuilding.**

This proposal has does not meet the requirements of Policy RES7 in any way whatsoever and as such we feel very strongly that permission should be refused.

In the 2018 Proposed Local Development Plan **POLICY 14 – GREEN BELT AND COUNTRYSIDE** states “**Development in the Green Belt and Countryside will only be permitted if it is appropriately designed, located, and landscaped, and is associated with:**

- a) agriculture, horticulture, woodland or forestry;**
- b) a tourism or recreational use that requires a countryside location;**
- c) infrastructure with a specific locational need;**
- d) the appropriate re-use of a redundant stone or brick building, the retention of which is desirable for its historic interest or architectural character, subject to that interest or character being retained; or**
- e) intensification (including extensions and outbuildings) of an existing use, which is within the curtilage of the associated use and is of an appropriate scale and form.**

Proposals associated with the uses set out in criteria a)-c) must provide justification as to why the development is required at the proposed location.

We believe that this application fails to meet all of the criteria listed in the above policies and as such should be refused.

In the applicant’s, Design and Access statement, several references to policies in the Local Development Plan 2014 are quoted, including SDS2, SDS3, SDS4, SDS8, ENV2, ENV6, ENV7, INF4, INF5 but they have not referenced Policy RES7 which explains very clearly and firmly the conditions under which development in the Greenbelt and Countryside will be supported.

The Design and Access Statement has completely ignored this policy and the application is therefore not compliant with the laid down policies of the Local Development Plan 2014 with regard to the Greenbelt.

Roads and Public Transport

Residents are concerned about an increase in traffic if this development were to go ahead. The roads in the area of Planetreeyetts are narrow and extremely congested. This has been borne out recently with the local bus being terminated at the Wateryetts Roundabout instead of travelling up to Finlaystone Road because it was unable to get past the parked cars on the side of the road. The High Street also has parking on both sides of the road which effectively makes it single track in many places. A further 200 or so cars in the area will only exacerbate the problems.

As local residents know, there is not an adequate bus service to support and encourage commuting by public transport, whether for workers, school children, shoppers or students. The only bus routes, with limited frequency and hours, are between Kilmacolm and Glasgow, Kilmacolm and Greenock and Kilmacolm and Johnstone Station. There is no realistic bus service, for example, to our main hospital, at Inverclyde Royal Hospital nor Alexandra Royal Hospital at Paisley.

Concerning private car transport, residents in a development of the type proposed are likely to have a large number of commuters to Glasgow and highly dependent on private car transport.

The vehicle "trip rate" estimates that are used in the Transport Assessment are considered to be too low. They assume as an "inflated worst case" scenario that each house will generate 0.323 vehicle trips in the morning rush-hour and 0.368 vehicle trips in the evening. These figures seem to be based on people living in towns where there is reasonable public transport options but here we are dealing with a village scenario where there is limited public transport and the tendency is towards private car journeys. Anyone considering the pattern of commuting to/from work and school in Glasgow or elsewhere knows that these figures are unrealistically low. Most of the houses will be family houses, and most of them could generate at least one car trip per rush-hour.

We would suggest that the additional traffic flows generated by this site will likely be many times more than those assumed in the applicant's Transport Assessment.

Biodiversity

There was an assessment carried out in 2017 on behalf of Inverclyde Council by Starling Learning that looked at Planetreeyetts as a potential Local Nature Conservation Site (LNCS). This assessment looked at the flora and fauna of the area and the results were published. With regard to the Flora the assessment stated:

"The bulk of the eastern section of the site comprises a rather uniform low diversity grassland, contrasted with the more diverse marsh on the western side. In total over 100 species were recorded during the current visit; 40 species were noted in the brief visit to the fen. Together with other marginal land there is a good total of species recorded, several of local rarity, and a good array of mire species many being indicators of a less enriched water table: lesser-tussock sedge (*Carex diandra*), bog bean (*Menyanthes trifoliata*), marsh pennywort (*Hydrocotyle vulgare*), white sedge (*Carex canescens*), whorled caraway (*Carum vertillatum*), and the bay and purple willows."

With regard to the Fauna the assessment stated:

"The site has a variety of bird habitats including mature hedgerows, woodland and marsh. There is a directly adjacent marsh with good potential for breeding marsh species. There is a rookery in the trees adjacent to the farm."

In addition, the assessor found a variety of bird species on site including Buzzard, Woodpigeon, Barn Owl, Jackdaw, Rook, Swallow, Grasshopper Warbler, Wren, Starling, Song Thrush, Mistle Thrush, Robin, Dunnock, Chaffinch and Goldfinch.

On this bird list, there are 3 that are on the UK BAP list, 3 on the Scottish Biodiversity List, 4 are Red Listed, 1 is Amber Listed and 3 are Priority species. **This makes them of national interest for nature Conservation.**

The assessment also found evidence of Badger, Bats (Soprano, Pipistrelle and Brown Long-eared), Roe Deer, Field Vole, Frog, Peacock Butterfly.

Of these Badgers are nationally protected under The Protection of badgers Act 1992 and Roe Deer are on the Scottish Biodiversity list. **This makes them of national interest for nature conservation.**

The assessment conclusion states

“ The eastern part of the site is of low nature conservation value as the pasture has long been improved and heavily grazed. The western side by contrast is of high interest, notably the area of the fen and carr in the extreme south. If this section is considered along with the marsh within the West Quarry survey area and acid grassland north to the large basin mire, then a block of high nature conservation value is formed. Several bat species have been recorded and there is good roost potential in both trees and building.”

This assessment is totally at odds with the ecological survey commissioned by Taylor Wimpey and carried out by Karen Findlay which states in the opening paragraph of the executive summary on page 3

“No part of the Planetreeyetts (PTY) site has been identified as internationally or nationally important for nature conservation reasons.”

It seems that the survey commissioned by Taylor Wimpey has down played the importance of the nature conservation elements of the site.

Although the nature conservation area is on the western side of the site, the proximity of it to the proposed housing scheme means that it will be affected by that scheme and very careful monitoring would have to be in place to ensure that habitats are not destroyed or disturbed by the building work.

Infrastructure

Long term parking within the village is woefully inadequate and a further 100 or so homes will only add to the problem especially at peak times in the morning and at afternoon pick up for school children.

The resources of the doctors and dental surgeries are already stretched and this will exacerbate the problem even further.

Conclusion

The applicant claims to have paid attention to the results of the pre-application consultation, but the community view is that they have not addressed the main concern raised of building on the Greenbelt and Countryside.

Likewise, the Kilmacolm Community Council has paid attention to the submissions of the applicant, but finds nothing in the application that qualifies under Policy RES7 in the Local Development Plan 2014 to build on Greenbelt and Countryside so again we feel that this application should be refused.

The application is for Planning Permission in Principle which means that any plans or assurances given in the 17 or so documents associated with this application are totally meaningless as this site could be sold on to any builder to develop it the way they see fit and which makes the maximum profit for them. For this reason, we feel that Inverclyde Council should refuse this application.

The development is promoted against the wishes of the local community and against the considerations and policies of the Local Development Plan 2014.

The Kilmacolm Community Council is opposed to this application and ask that it be rejected by the Inverclyde Council.

Yours faithfully,

Mike Jefferis
Chair
Kilmacolm Community Council