

Head of Regeneration and Planning  
Council

Inverclyde Council

Municipal Buildings

Clyde Square

Greenock

PA15 1LY

Kilmacolm Community

Cargill Centre

Lochwinnoch Road

Kilmacolm

PA13 4LE

10th January 2018

Dear Sir,

**17/0403/IC Land at Knapps and North Denniston, Bridge of Weir Road, Kilmacolm**

Kilmacolm Community Council provides its response to the Gladman Developments Limited application for Planning Permission in Principle for a substantial residential development at the Knapps and North Denniston, Bridge of Weir 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 Inverclyde Council Local Development Plan - Main Issues Report dated March 2017). Of special concern is the applicant's disregard for the Green Belt designation, which was stated in the Local Development Plan 2014 in Policy RES7 on page 48.

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 fell over the Christmas Holidays and recess of the community council, has imposed tremendous additional effort on community members.

The application will be discussed under the following headings:

- Local Development Plan
- Green Belt
- Landscape and visual impact
- Sustainable development
- Social and physical infrastructure - Waste Water (Sewage)
- Roads and Public Transport
- Biodiversity
- Housing supply/Effective housing site

## 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 proposed site.

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 proposed Local Development Plan - Main Issues Report of March 2017, has taken consideration of the local needs, and of local communities' comments. At each stage, the LDP process has evaluated the housing needs and options and has repeatedly considered and rejected the sites presently proposed.

The Local Development Plan - Main Issues report already identifies adequate plots for "controlled but limited expansion" of the village. Within the proposed Local Development Plan there have been areas identified for housing developments within Kilmacolm to meet the needs of the community and protect the Green Belt. These were proposed and discussed in the Local Development Plan - Main Issues report 2017 and the Call for Sites Assessment (March 2017).

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 area.

We agree with the Spatial Strategy of the current Local Development Plan 2014 and the Local Development Plan - Main Issues Report (March 2017), such that significant expansion of Kilmacolm and similar rural villages is undesirable. Minor expansion to meet the needs of the community itself is all that should be allowed. Without doubt, the present application is designed primarily to meet the needs of the landowner and Gladman Developments Limited. We believe strongly that the Local Development Plan 2014 be respected, and not disregarded for the present proposal.

Gladman Developments Limited are promoting this site as a possible windfall site in accordance with the Local Development Plan 2014 windfall definition but they have only quoted a part of the definition. The full definition of a windfall site is: -

"Windfall sites arise unexpectedly and are by definition not part of the planned housing supply. These are opportunities for new housing involving the reuse or redevelopment of previously developed sites, i.e. brownfield sites which were not included within the development plan and are not counted towards meeting the housing land requirement. They might be included as part of the established supply in the audit as a result of an urban capacity study where the site is considered to have potential for housing development. These sites should count towards meeting the housing land requirement only once planning permission has been granted for residential development and it is considered to be effective or is being

developed. To allow planning authorities to monitor the contribution of windfall sites to the housing land supply in their area, these sites should be differentiated in the audit. “

In this instance the area in North Denniston and the Knapps do not fall within the definition.

### **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 LDP, more applications would follow.

### **Landscape and visual impact**

The visual impact of the proposed housing development on the approach to the village and on leaving the village, as well as the visual impact from further afield would be completely out of character. Residents believe that the proposed development threatens the identity and setting of the village.

In the applicant’s Landscape and Visual Impact assessment consideration is given to the landscape and views. Several references to policies the Local Development Plan 2014 are quoted, including SDS8, ENV1, ENV2, ENV3, ENV4, ENV6, ENV7, HER1, HER5, HER7 and HER8 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.

This policy states:

#### **“Policy RES7 - Residential Development in the Green Belt and Countryside**

**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.**

**In addition, all proposals must fall within one of the following categories:**

- (a) demolition and replacement of habitable dwellings which cannot otherwise be brought up to acceptable building standards and where the proposed building reflects the scale of the existing building and is sympathetic to the character, pattern of development and appearance of the area; or**
- (b) sub-division of an existing dwelling house(s) for the provision of one or more additional units where any new build element is clearly ancillary to the completed building; or**
- (c) conversion of redundant non-residential buildings, where the proposal requires to be supported by proof of the building's redundancy to demonstrate that it no longer meets its original purpose, as well as a structural survey indicating that the building may be utilised for the proposed use substantially in its current form, and that any proposed extensions to existing building(s) or ancillary new build element will need to be proven to be required to make the development financially viable, with details of costs to be submitted; or**
- (d) is justified by the operational needs of farms or other businesses or activities which are inherently rural in nature and where the applicant will be required to make a land management or business case to the satisfaction of the Council: or**
- (e) is part of an integrated project with significant employment and/or economic benefits which is in accordance with other policies of the Local Development Plan and where the Council is satisfied that the dwelling(s) are essential to ensure the implementation of the whole development and that such considerations are of sufficient weight to merit support."**

The Landscape and Visual Impact Assessment has completely ignored this policy and the application is not compliant with the laid down policies of the Local Development Plan 2014.

## **Sustainable development**

We support the Local Development Plan 2014 aims of sustainable development, in all aspects. We reject the present proposal, as it disregards those aims, and will only create longer term problems for the community, and the wider infrastructure. In particular, a large number of additional large private market houses is not required, and will only perpetuate the legacy of imbalance in housing types and tenure types, which we believe is already causing difficulties for this community.

## **Social and physical infrastructure - Waste Water (Sewage)**

The Waste Water provision in the area of the North Denniston East development is a source of concern. The three properties on the east end of Gryffe Road are not connected to mains sewerage but have septic tanks. We have not investigated the reasons for this but it is a concern. Anecdotal evidence suggests that people living in the area of North Denniston North have complained that overflows of foul water from the Milton Wood Tank area.

## **Roads and Public Transport**

Residents are concerned about an increase in traffic if this development were to go ahead.

With regard to public transport (buses), paragraph 4.27 of the Transport Assessment states that there is a bus every 20 minutes. This is not correct and it is in fact every 40 minutes up to 18:30 in the evening when it then reverts to hourly. The Design and Access Statement paragraph 7.3 Table 4 indicates that there is a bus 530 every 20 minutes from and to Greenock. This bus has been discontinued and no longer runs because the X7 has been changed to run every 40 minutes into the late evening. McGill's buses do not support the 530 any longer. There is also a bus every 1.5 hours from Kilmacolm to Johnstone Station.

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 Infirmary 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 0.365 vehicle trips in the morning rush-hour and 0.365 vehicle trips in the evening. Anyone considering the pattern of commuting to/from work and school in Glasgow or elsewhere knows that this figure is 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 double or more, those assumed in the applicant's Transport Assessment.

### **Biodiversity**

Many residents have been concerned about the impact on birdlife especially, if this development were to proceed. The biodiversity survey was carried out by the EnviroCentre Limited on behalf of Gladman Scotland Ltd in July 2017 at a time when the migrating birds who regularly visit the site were not present.

### **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. We know that the present applicant, and other parties such as Homes for Scotland have challenged the Local Development Plan process as to the total allocation of housing land for the Inverclyde planning area, and all parties await the decision of the Reporter, following the hearing in 2018. However, for reasons explained above, the site is unsuitable under so many of the other policies of the Local Development Plan 2014, that the application must be refused, regardless of any increase in the total allocation.

The community council is not against the provision of additional housing, of appropriate types and in appropriate locations. This is confirmed in our responses throughout the Local Development Plan process.

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.

Among the demand for affordable housing, some specific pleas have been made for larger houses (3 to 4 bedrooms). In other words, affordable housing for growing families is needed, but the illustrative masterplan indicates that the affordable houses would only be 2-3 bedroom units. Units of "2 to 5" bedrooms are reserved for market pricing.

With regard to the appearance of the development itself, the Design Statement suggests it is based on typical houses of the area. However, in the immediate vicinity of the Knapps site, houses are diverse, large country houses in individual settings. The residents are clear that the development threatens the character and setting of the village.

## **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.

The development is promoted against the wishes of the local community and the planning authority, 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