

**KILMACOLM CIVIC TRUST**  
(Scottish Charity No SCO 32744)

**From: Mr RN Cameron**  
**(Chairman Kilmacolm Civic Trust)**

**Kaladan**  
**Lochwinnoch Road**  
**Kilmacolm**  
**PA13 4DY**

**Tel: 01505 873699**

Mr Stuart Jamieson  
Head of Regeneration and Planning  
Inverclyde Council  
Cathcart House  
6 Cathcart Square  
Greenock  
PA15 1LS

14<sup>th</sup> December 2011

**Kilmacolm Civic Trust Comment on the Inverclyde Council “Post Main Issues Report  
Additional Suggested Development Sites Consultation” Paper**

Reference: Your L.2.3 dated 4<sup>th</sup> November 2011

Dear Mr Jamieson

The Kilmacolm Civic Trust (KCT) has considered the “Post Main Issues Report Additional Suggested Development Sites Consultation” paper.

Our comment is attached, together with two supporting documents and 4 photographs.

Yours sincerely

*Nicol Cameron*

Nicol Cameron  
(Chairman Kilmacolm Civic Trust)

Attachments:

1. KCT comment dated 14<sup>th</sup> December 2011 on the post-MIR Additional Sites (4 pages)
2. KCT paper titled ‘Kilmacolm in The Future’ dated 31<sup>st</sup> August 2010 (9 pages)
3. KCT comment on the Inverclyde Development Plan MIR, dated 20<sup>th</sup> July 2011 (2 pages)
4. 4 x photographs (2 taken from Park Road; and 2 taken from ‘Meadows’)

**KILMACOLM CIVIC TRUST**  
**(Scottish Charity No SCO 32744)**

**KILMACOLM CIVIC TRUST COMMENT**

**ON**

**INVERCLYDE DEVELOPMENT PLAN “POST MAIN ISSUES REPORT  
ADDITIONAL SUGGESTED DEVELOPMENT SITES CONSULTATION”**

The Kilmacolm Civic Trust thank you for giving us the opportunity to comment on the Post Main Issues Report. We have the following comments on the six sites in our area of interest.

**Principles**

First, we remain firm on the views that we expressed to you in our paper ‘Kilmacolm in the Future’ dated 31<sup>st</sup> August 2010 (copy attached).

**Preface to our comments**

As a preface to our comment on the six sites listed in the post-MIR report we draw your attention to what we wrote in our letter dated 20<sup>th</sup> July 2011 (copy attached), when we responded to the full MIR Report:

**Chapter 8 Suggested Development Sites - Figure 19 Suggested Development Sites in Green Belt**

The Main Issues Report clearly identifies the lack of need for additional housing in the Renfrewshire Sub Housing Market Area. We therefore see no reason to relax the policy on the Green Belt, especially as we support the policy of strengthening the quality of the built environment. We also understand from Scottish Water that there is almost no capacity for additional water supply to new houses in Kilmacolm. We would be against development of any of the sites (1-14) in Kilmacolm or Quarriers Village for Housing. We would be supportive of Lochwinnoch Road (site 5) for the educational development provided that there is clear community benefit, e.g. access to parking and playing fields and it excludes housing. We can provide arguments against each of the sites if required, but at this stage think that, as there is no proposed change to the overall policy, arguments made recently to and also by the council, for example on sites 11 and 13, stand.

**Comments**

Serial 6 (North Denniston Farm). We note, and are pleased, that Duchal Estate / James Barr have withdrawn the development proposal.

Serial 7 (Bridge of Weir Road). We note, and are pleased, that Duchal Estate / James Barr have withdrawn the development proposal.

## **KILMACOLM CIVIC TRUST** **(Scottish Charity No SCO 32744)**

### Serials 35 (Park Road) and 36 (Hazelmere Road).

The Main Issues Report makes it clear that there is no need to develop additional new housing in Kilmacolm.

We support strongly the proposal made in the MIR that the Green Belt in this area should incorporate the designated SINC which lies to the east of the river Gryfe and that it should be extended to reflect the SINC boundary.

We note that Millpond Developments (Kilmacolm) Ltd appear to wish to have the two areas designated for housing. We are aware of the long-standing history of, and reasons for the private ownership of the land in these two areas; also of the boundary lines contested by certain owners. We point out that the charter of the Civic Trust is not to attempt to preserve land values nor to act as arbiter over ownership issues.

The Civic Trust is strongly opposed to any form of housing development on either of the two sites 35 and 36. We would also strongly oppose any attempt by anyone to develop any of the land in the SINC between sites 35 and 36.

Birkmyre Park provides a much appreciated green space and recreational area in this part of Kilmacolm. A particularly attractive aspect of the park is the uninterrupted southerly and westerly views across the SINC and out to the Renfrewshire Hills from the sloping ground of the park beyond the putting green and the multi-use games area. This is enjoyed by many people who use the park, or live on the periphery of the southern part of it; and by many villagers who use the Hazelmere Road route and footpath along the edge of the SINC for walking. Building houses on the western side of Hazelmere Road would be a tragic desecration and loss of those lovely landscape views of the hills and the wetland marshes.

The land designated in sites 35 and 36 is in any case unsuited to development as it is in effect a flood plain. It is very low lying and prone to being flooded by overflow from the river Gryfe whenever it is in spate which happens often during the year after prolonged periods of rain and after snowmelt. The attached four photographs of the area were on 29<sup>th</sup> November 2011 from 'The Meadows', and in early December from Park Road . (photographs attached)

They show the extent of flooding that developed there during the latter part of November/early December this year and emphasise the point.

Finally, we are advised that the current capacity for additional water supply and effluent disposal for Kilmacolm is very limited. We understand that it is already under strain and capable of providing water for only approximately 10 more new houses in Kilmacolm.

### Serial 37 (West Glen Road)

The Kilmacolm Civic Trust has fought long and hard over many years against attempts at encroachment into designated Green Belt land. There have been repeated applications by development companies, and by individuals, to develop green field sites on land round the periphery of Kilmacolm (e.g. The Quarry site on Port Glasgow Road; The Plots on Port Glasgow Road). All have been refused by Inverclyde Council and many of the decisions have then been appealed. In each instance the appointed Inquiry Reporter has rejected the appeal and the integrity of the Green Belt round the periphery of Kilmacolm has been preserved.

## **KILMACOLM CIVIC TRUST** **(Scottish Charity No SCO 32744)**

The Civic Trust is strongly opposed to any form of housing development on this site for three key reasons. First, the Main Issues Report makes it clear that there is no need to develop additional new housing in Kilmacolm. There is therefore no need to release Green Belt land on the periphery of Kilmacolm. Second, the land identified by the applicant (Site 37) is large enough to be developed to accommodate either one large house, or several houses of moderate size. Third, if development were permitted here 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 on the opposite (southern) side of West Glen Road extending gradually northeastwards from the small bridge over the burn that comes out of the Hydro pond development, to a point opposite the proposed site (serial 37) or even beyond. When ruling on the Plots on Port Glasgow Road, and on the Quarry on Port Glasgow Road, the Inquiry Reporters have refused the appeals on several grounds of which a principle reasons were that the land is in the designated Green Belt, the loss of attractive visual amenity, and the introduction of ribbon development.

Finally, we are advised that the current capacity for additional water supply and effluent disposal for Kilmacolm is very limited. We understand that it is already under strain and capable of providing water for only approximately 10 more new houses in Kilmacolm.

### Serial 38 (Smithy Brae)

The Kilmacolm Civic Trust has fought long and hard over many years against attempts at encroachment into designated Green Belt land.

There have been repeated applications by development companies, and individuals, to develop housing on green field land round the periphery of Kilmacolm. Three such applications are:

- (1) All the farmland on the western side of Port Glasgow Road extending from opposite the entrance to Auchenbothie House down in a southerly direction to the Green Belt boundary just north of 'The Cottage' and in a westerly direction as far as the line of the fencing that runs beside the cycle track, excluding the Plots.
- (2) The Quarry site on Port Glasgow Road.
- (3) Various applications by individuals to build on The Plots on Port Glasgow Road.

All have been refused by Inverclyde Council and the decisions have then been appealed. In each instance the appointed Inquiry Reporter has rejected the appeal, and the integrity of the Green Belt round the periphery of Kilmacolm has been preserved.

The case that the Kilmacolm Regeneration Trust made to you in their letter dated 21<sup>st</sup> July 2011 regarding regeneration of Smithy Brae is predicated on being granted use of the device of 'Enablement' to achieve their aim. Paragraph 3 states:

*'The Kilmacolm Regeneration Trust would like to request the release of a portion of green belt land to the north of the old gasworks site to accommodate a mixed residential development and also enable other local facilities to be provided' .*

What the Kilmacolm Regeneration Trust has requested is release of an extensive piece (as far north as an east-west line projection from Gibson Lane) of the very attractive agricultural 'wedge' that extends into Kilmacolm from the north that makes that part of Kilmacolm so attractive and gives it so much unique character.

## **KILMACOLM CIVIC TRUST** **(Scottish Charity No SCO 32744)**

The Main Issues Report makes it clear that there is no need to develop additional new housing in Kilmacolm. There is therefore no need to release Green Belt land on the periphery of Kilmacolm.

The Kilmacolm Civic Trust is strongly opposed to any form of housing development on the piece of green field land requested:

Enabling Policy is a very carefully controlled, and very special, power created specifically for, and granted under strict rules in England and Scotland, the preservation of distressed Historic and Listed Buildings.

There is no justification for Enablement in the case of the proposed enlarged Smithy Brae development. The site does not contain a listed building and none of it is within a designated Conservation Area.

If the argument is being made (by the Kilmacolm Regeneration Trust) for Enablement, the evidence for it needs to be presented. As it has not (as per English Heritage) then there is no case. Is not the MIR about zoning and not Enablement? Therefore is Enablement a legitimate MIR gambit by the Kilmacolm Regeneration Trust and should it even be considered as part of this process? The company that applied for and was given planning authority to build on the old gasworks site undertook to build on it without recourse to Enablement.

Were planning permission to build on this green field land granted it would create a precedent and lead to renewed attempts to develop further north in this Greenfield area leading to its ultimate loss.

Were planning permission granted to build on this green field land, a housing development there would create significant additional access and egress problems to and from Smithy Brae.

Remainder of Site 38. The Kilmacolm Civic Trust does however, support development of the rest of the area. Planning permission exists already for 21 flats and 2 town houses on the land encompassing the old gasworks site and the cottage. We also support redevelopment of the old Library/KCC building, the two adjacent shops and the garage beneath. It is unfortunate that the developer that had produced plans and been granted planning permission for the former gas works site was unable to execute, with the result that the site is once again on offer. However, the market will recover, leading to incentive to develop. It is encouraging that the former library site has attracted interest. Although there are no accepted offers for it at present (i.e. there is demand), the market will recover and prices will rise.

Signed

*R.N. Cameron.*

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

14<sup>th</sup> December 2011