

Kilmacolm – Milton Wood

Site description

7.339 This objection site comprises 31ha of land forming what is shown in figure 3.6 of the local plan as a 'sensitive wedge' of countryside/green belt on the south side of Lochwinnoch Road. The western part of the site is an area of mature mixed woodland, while the eastern part is a series of long narrow fields of rough (horse) grazing. At the northern end there is a gatehouse and stone gate posts, with the former driveway to Duchal House running south through the woodland. To the east of the gatehouse are 2 police houses and then a small gap before the Lochwinnoch Road bridge over the former railway line, which at this point is in cutting with almost vertical rock sides. At the southern end of the site, the woodland extends east right up to the former railway line which passes from cutting on to an embankment.

7.340 The landform of the eastern part of the site is undulating, with a number of minor ridges and valleys crossing from east to west and the land generally falling south to the Gryffe Water. There are 2 knolls towards the north end of the site, the southern one having exposed rock. The southern end of the site has gentler slopes.

7.341 To the west is an area of relatively modern suburban development and a primary school. To the north are the gatehouse, the police houses and Lochwinnoch Road. To the west is the former railway line which is now part of the National Cycle Network. On the other side of the railway line is Gryffe Road which, on its east side, has large detached properties – some of which are now occupied by St Columba's School. Further south, Gryffe Road moves away east, with large houses and gardens on both sides; on the west side, at its junction with Duchal Road, an all weather playing pitch has been constructed, whose western edge encroaches on to the solum of the former railway line. South of this pitch is an area of open ground leading south to North Denniston, a recently converted farm steading.

Planning background

7.342 In the 1988 local plan, the site was included in the green belt, with much of it (excluding a narrow strip alongside the former railway line) shown as a nature conservation site. In 1992 the former Inverclyde District Council refused to grant planning permission for a residential development by CALA on the objection site, and a subsequent appeal was dismissed in September 1993 following a public local inquiry (P/PPA/SN/136). In his conclusions, the Reporter found that there was a quantitative and qualitative shortfall of housing land, but nonetheless also found that the site was correctly located in the green belt and that its development "would be likely to seriously compromise the landscape setting of Kilmacolm."

7.343 In the 1998 consultative draft local plan, the eastern strip was identified as a potential housing site (HC9 – see para 0.2 above), while the

rest of the site was shown as part of a larger SINC. In the 2000 local plan, the whole site is shown in the green belt (para 7.339 above), with most of it again forming part of a larger SINC covering Duchal Estate – designated because of its woodland and water bodies.

Objector: **CALA Homes (West) (134006)**

7.344 CALA's objection is related to its objection re the failure of the local plan to allow for any affordable housing in Kilmacolm (paras 7.42-.52 above). It reads:

"The objection site would be suitable for both types of affordable housing, through enabling development. Due to its proximity close to the village centre, the northern part of the Milton Wood site would also be suitable for special needs housing which could be integrated into other facilities associated with a new rail station."

7.345 In the latter half of 2003, representatives of CALA met with council officials to discuss the possibility of this objection being amended. In a letter of 3 September, the Head of Planning Services advised that any such amendment would require to be lodged in good time if it was to be considered at the forthcoming inquiry. CALA's Statement of Participation in early February 2003 referred *inter alia* to 'Milton Wood as now amended' and requested that the alternative case be heard at the inquiry. In essence, the 'alternative case' included the following elements:

- f On the objection site: new railway station
 - new village hall
 - shared hall and park & ride car park
 - affordable housing
 - new footpaths
 - woodland retained, managed and transferred to community ownership
 - open space
 - St Columba's School relocated, with playing pitches
 - cycle track realigned to west of railway line

- f Outwith objection site: railway line re-opened
 - site of St Columba's School redeveloped for housing
 - new footbridge over railway line
 - St Columba's all-weather pitch and open ground to south developed for housing

7.346 4 different options for achieving these elements were produced by CALA in advance of the inquiry. However, when word of this 'alternative case' got out in Kilmacolm, Kilmacolm Civic Trust and many local residents objected to the proposals and to the fact that they had had no chance to view and comment on them beforehand. At the inquiry, the council indicated that it was not prepared to consider them, and CALA agreed not to pursue them *per se* but to leave them on the table as an indication of future development possibilities (para 7.348 below). My consideration is therefore restricted to the terms of the original objection, which specifically excludes the possibility of St Columba's School and its playing fields being relocated on the objection site, of its existing site being redeveloped for housing, of its all-weather pitch and land south to North Denniston being developed for housing, and of a new community hall being built on the objection site. In that CALA also has an 'objection' re the re-opening of the former railway line, I do consider the possibility of a new railway station and car park being provided, even although CALA is not formally requesting such an allocation.

7.347 At the inquiry, evidence for **CALA** was given by Mr P Allan (planning consultant) and Ms Read (landscape architect). Much of Mr Allan's evidence was on the topic of affordable housing and is covered in the summary of Mr Smyllie's closing submission (paras 7.42-.52 above). What follows is a summary of the site-specific part of Mr Smyllie's closing submission, although I have of course taken full account of the evidence of Mr Allan and Ms Read.

7.348 What CALA is seeking is the removal from the green belt of a small part only of the site, at its northernmost end, as an appropriate location for affordable housing. The vast majority of the site would remain within the green belt. The affordable housing would have to be provided through enabling development which, although not formally within the ambit of the objection, might be provided as per one of the 4 development options. No allocations are requested re St Columba's School or infrastructure associated with the re-opening of the railway line, although again illustrative options have been made available.

7.349 In that a case has been made for the provision of some affordable housing in Kilmacolm (what para 40 of SPP 3 calls a 'demonstrable requirement for additional housing'), the question arises: where is it to be provided? The council thinks that sites other than Milton Wood might be available in due course, including its own ineffective site at Leperstone Avenue and other vague possibilities suggested by the Kilmacolm Civic Trust (para 7.74 above). However, the evidence demonstrates that there is no realistic prospect of an immediate need for affordable housing being met on sites within Kilmacolm, and it follows that the need must be met outwith the current settlement boundary on greenfield/green belt land. A review of the inner green belt boundaries should have been carried out to ensure a long-term sustainable settlement strategy.

7.350 The council's reason for not considering the objection site as a potential greenfield release is based on the 1993 appeal decision. However, since then there has been a decline in the agricultural value of the site, a lack of maintenance of the woodlands, and the impact of the construction of the floodlit all-weather pitches and the redevelopment of North Denniston. What is now proposed is the removal of a very much smaller area of land from the green belt than was the case then. There will be very significant future changes associated with the re-opening of the railway line, affordable housing was scarcely an issue in 1993, and opportunities for development within the settlement boundary have diminished, such that development of greenfield land can no longer be deemed to be simply the 'easy option'.

7.351 In any event, Ms Read has carried out an assessment of the site against current recognised landscape guidance, and has concluded that:

- f* The removal from the green belt of a small area at the northernmost part of the site (no further south than the northern knoll) would not compromise the landscape setting or character of the village;
- f* The green belt role of this small area is limited;
- f* A new defensible green belt boundary could readily be formed;
- f* Views into the site are limited; a sensitively designed development, whilst not invisible, would not have an unacceptable visual impact, given the topography and the 'urban fringe' nature of the location generally.

In the circumstances, it is at least possible that her conclusions are better informed than were the findings of the Reporter in 1993, and are to be preferred to them.

7.352 The structure plan imposes an obligation on the council to investigate and confirm the rail link to Bridge of Weir and Kilmacolm, but all the council has done is to safeguard the route. It has not taken any steps to either investigate or confirm the rail link, and therefore the local plan does not accord with the structure plan. It is obvious that a new station cannot be built on the site of the old one north of Lochwinnoch Road,

and the 4 possibilities put forward by Ms Read are the only realistic options.

7.353 For **the council**, evidence was given by Mr F Macleod, and I have taken account of this. What follows, however, is a summary of the relevant parts of Mr Collar's closing submission, which should be read in conjunction with paras 7.55-.67 above re affordable housing – particularly paras 7.59 & .63.

7.354 CALA's evidence is that 20 affordable houses can only be provided by an enabling development of 30 'normal' houses. Although the objection does not seek an allocation for the latter, the evidence shows that they are the inevitable result of any allocation for affordable housing and the objection must be assessed in that context. There is therefore justified concern that there could be an impact on the council's regeneration strategy because of the diversion of development and investment from the core areas, and because of the risk of precedent.

7.355 It is strange that CALA's witnesses should have made no reference to the 1993 planning appeal decision. That was made following a number of findings by the Reporter, which remain valid:

- f* The impact on the overall character and setting of this part of Kilmacolm is critical. He recommended refusal even although he found a good prospect of the development being successfully integrated within the site in a short period. That highlights the sensitive nature of the site.
- f* The existing green belt boundaries are well defined and well related to existing physical features.
- f* Despite what Ms Read thinks, the land retains both the character and appearance of countryside.
- f* The appearance of the countryside running into the heart of the community would disappear in important views to which the public have access in the surrounding area. It is, of course, inevitable that are urban influences in views of land on the edge of a settlement. Ms Read agreed that the affordable housing would be partially screened from one viewpoint after 10 years, and that from another a new access road and street lighting would be seen; however, perversely she said that these changes would not be substantial because the site is already 'urban fringe'.
- f* The land continues to make a significant contribution to the purposes for which this green belt was established. Ms Read accepts that only a small part can be justified for release because of the exceptional need for affordable housing.

7.356 Whereas CALA only seeks the removal of the northern part of the objection site from the green belt, Ms Read's assessment only addressed the site as a whole and provided no assessment of the consequences of building on merely the northern part. She had wrongly assumed that the gatehouse was not in the green belt, and there has been no criticism of the adequacy or defensibility of the existing green belt boundaries here. Very little has changed since 1993 when the Reporter found the site to be important to the landscape setting of Kilmacolm. It is clearly premature to use the possible re-opening of the railway line as something that will bring about landscape change. Building affordable houses on the northern part would have an unacceptable impact on Kilmacolm's landscape setting. If they were to be built, it is not clear where the new green belt boundary would be; Ms Read said that it would require planting, which highlights its weakness as a green belt boundary.

7.357 It is doubtful if a heading in a schedule can be described as a structure plan requirement, but the council has consulted with SPT – which does not see the reopening of the railway line as a priority. In these circumstances, further investigation is not required. In any event, by being recognised in local plan policy TA6 and shown on the Proposals Map, it is effectively 'confirmed'. Although re-use of the former station building is highly unlikely, CALA has produced no evidence of any investigation of alternative sites other than Milton Wood. See para 5.601 below.

7.358 **Kilmacolm Civic Trust** supports the main thrust of the local plan, but has some detailed reservations. The fact that there are no proposals for alterations to the green belt to allow for housing developments in Kilmacolm and Quarriers is welcomed. Much of the rural character of the former derives from the many sensitive wedges of green areas that project into the very heart of the village. This makes Kilmacolm very different from typically suburban areas and makes it such a pleasant place in which to live. This is also why Kilmacolm and Quarriers are such a target for developers who recognise that property there can attract premium prices.

7.359 The Trust is still concerned about the continuing endeavours of developers to have the protective green belt modified with a view to building more houses; this would be to the detriment of the existing settlement. Although having only 7% of the population of Inverclyde, the 2 villages had 25% of its planning applications in 2003. The fact there are 11 objections seeking the release of green belt land at the edge of Kilmacolm gives some idea of the development pressure. There is danger of overdevelopment and increased strain on infrastructure. The Trust is not attempting to preserve the 2 villages in aspic, but they cannot sustain many more housing developments without the quality of life for existing residents suffering. At the inquiry, Mr Houston made particular reference to the amount of additional traffic causing problems in the already congested Kilmacolm village centre.

7.360 As the population of Inverclyde continues to fall, vacated accommodation (including council houses) will become available, and there are enough brownfield sites elsewhere to satisfy any general requirement for additional housing. Moreover, the general demand for owner-occupied housing in Inverclyde is levelling off after the big increase between 1981 and 2003. The Trust has for some time been trying to involve the council in preparing an overall development plan, particularly for the brownfield village centre of Kilmacolm, dealing with the community centre, library, council-owned shops and the original village green. Unless such a comprehensive plan is prepared, the present run-down condition of part of this area will lead to redevelopment in a piecemeal and haphazard way.

7.361 Milton Wood is one of the sensitive green wedges, where development has been turned down before. In relation to the alleged need for affordable housing, see paras 7.73-.74 above. The Trust does not believe that any proof has been provided that a substantial amount of affordable housing has to be provided in the village. The council does not think there is any prospect of the railway line being reopened for 15- 20 years, but has protected the solum after consulting SPT. See para 7.598 below.

Conclusions

7.362 I have dealt with the issue of the alleged need for affordable housing in Kilmacolm in paras 7.75-.91 above. I have concluded that there appears to be a requirement for some affordable housing generated in Kilmacolm, that it should probably be provided in Kilmacolm, and that sites within the settlement boundary should be investigated before land outwith the settlement boundary. From the evidence with which I have been provided, about the only realistic option within the boundary appears to be the council-owned site at Leperstone Avenue, and I have suggested that its potential for having affordable houses built on it should be investigated as a matter of urgency (para 7.88 above). In para 7.394 above, I also suggest another possibility to the east of M&M's site at Old Hall.

7.363 However, if for any reason both of these sites prove unsuitable, I have to say that the evidence of Ms Read has persuaded me that the north east corner of the Milton Wood objection site between the police houses and the northern knoll would be a not unreasonable alternative. The provision of something that is urgently required in a situation when no other possibility within the urban area exists would represent a justifiable reason for removing this small area of land from the green belt. My consideration of the evidence and of the previous appeal decision and my site inspections have confirmed that this would not be inappropriate; the rest of the objection site would continue to be a sensitive green belt wedge, landscaping could soften the impact of the new development, and no precedent would be created. Of all the many sites being promoted for housing at the edge of the village, this seems to me to be the only one to have the potential capacity to be developed without any significant adverse effect on the landscape character of the settlement – and it is pretty central.

7.364 I reach this conclusion without giving any consideration to the possibility of the rest of the objection site being developed (which would be undesirable) or of enabling housing being provided north of North Denniston or anywhere else. Clearly, if the provision of affordable housing has to be funded by the provision of a larger number of mainstream private houses, the council will have to give careful consideration to where these are to be built. I therefore conclude that it is premature at this stage for the local plan to identify the north eastern corner of the objection site as a site for affordable housing, but that it should be seriously considered by the council in the event that the council accepts that affordable housing needs to be provided in Kilmacolm and that no suitable site exists within the settlement boundary.

7.365 As regards the former railway line, Strategic Policy 4 of the structure plan states that the sustainable development of the metropolitan area will be supported through the development of the strategic transportation network shown in schedule 4, which includes – as one of several “Public Transport Schemes to be investigated and confirmed through local plans” – “Rail link to Bridge of Weir & Kilmacolm”. In para 5.35 of the local plan there is a reference to this disused line, including the following:

“The re-opening of this line for passenger services would provide much needed public transport improvements between Kilmacolm and Glasgow, and it is therefore important to protect this line from any development that could prevent its future re-opening.”

Policy TA 6 – Safeguarding the Public Transport Network states that, in order to safeguard and develop the area’s public transport network, the council will *inter alia* safeguard land and infrastructure required for the re-opening of this line.

7.366 The issue is: is 'safeguarding' the same thing as 'investigating' and 'confirming' the light of the lack of priority given to the project by SPT, it is difficult to see what else the council could have done to meet the structure plan 'requirement'. It seems to me that the 'investigation' will in time be done by SPT, while the fact that the project is mentioned in the local plan and specifically identified on the Proposals Map is as much 'confirmation' as is currently possible.

7.367 It is presumably inevitable that, if the railway line is eventually re-opened, a station will have to be provided to serve Kilmacolm. Although the former station is now a public house, it is not altogether out of the question that it might be reincarnated, although presumably the Lochwinnoch Road bridge will have to be investigated. Other, possibly more realistic, options include the 3 possibilities put forward by Ms Read for CALA, all of which would have implications for the Milton Wood site in terms of a station building, platforms, access, car parking etc. Another option south of the village has also now been suggested by the Kilmacolm Civic Trust (para 7.598 below). However, in the light of the lack of urgency by SPT, I do not believe that it would be appropriate for the local plan Proposals Map to now show a specific site for these features, which are unlikely to materialise during the plan period. Rather, the suggestions of Ms Read and Kilmacolm Civic Trust should form part of SPT's eventual investigation, although it would be appropriate for the local plan to make some reference to them.

Recommendations

7.368 In the event that the council accepts that affordable housing needs to be provided in Kilmacolm and that no suitable site exists within the settlement boundary, serious consideration should be given to the possibility of the north eastern part of the objection site being allocated for affordable housing as part of the requisite local plan alteration relating to affordable housing (Draft Modification 21).

7.369 Para 5.35 should be modified to include a reference to the fact that, if the railway line is eventually to be re-opened, consideration will also require to be given to the provision of a new station, access and associated parking facilities ideally as close to the centre of the village as possible unless it is considered that perceived problems of congestion there make a more remote location preferable.