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By email to:
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Our ref: A20907130
28 June 2018

Dear Fiona Milne

RE: Inverclyde Council – Local Development Plan – Proposed Plan

I refer to your correspondence of 30 April 2018, inviting comments on the above document. Following the commencement of the general consultation period, Scottish Government would like to make the following comments:

1. Section 7 - Our Homes and Communities

Proposed change – The Housing Supply Target (split into affordable and market sector) should be set out for the plan area reflective of the requirements defined in Clydeplan SDP.

Reason – To demonstrate consistency with Clydeplan SDP and to comply with the expectations of SPP paragraph 115. It is insufficient to refer the reader of the plan to the technical paper as is currently outlined. Consideration should be given to the tables used in other recently prepared LDPs in city regions.

2. Section 7 - Our Homes and Communities

Proposed change – The Council should identify and explain the generosity allowance added to the housing supply target and identify the Housing Land Requirement for the area over the plan period reflective of the requirements defined in Clydeplan SDP.

Reason - To demonstrate consistency with Clydeplan SDP and to comply with the expectations of SPP paragraph 116. It is insufficient to refer the reader of the plan to the technical paper as is currently outlined. Consideration should be given to the tables used in other recently prepared LDPs in city regions.

3. Section 7 - Our Homes and Communities

Proposed change – Where a need is identified, planning authorities should prepare policies to support the delivery of appropriate specialist and other specific needs housing and consider allocating specific sites.

Reason – To comply with the expectations of paragraphs 132 - 134 in SPP. At present there is no provision within the plan to address any specialist or other specific needs housing that may be required for the area. If there are no needs, this should be explained in the plan.

4. Section 9 - Our Jobs and Business

Proposed change – The plan should encourage opportunities for home-working, live-work units, micro-businesses and community hubs.

Reason – To comply with para 95 in SPP.

5. Section 9 - Our Jobs and Business

Proposed change – The plan should support opportunities for integrating efficient energy and waste innovations within business environments. Industry stakeholders should engage with planning authorities to help facilitate co-location.

Reason – To comply with SPP para 96.

6. Page 10, Para 4.2 – Tackling Climate Change

Proposed change - The final bullet of para 4.2 should read:

‘70% of non-domestic buildings’ heat and cooling to be supplied using low or zero carbon generating technologies by 2032.’

Reason – The figure in the proposed plan is from the draft Climate Change Plan (January 2017), which has been updated in the final version (February 2018). The proposed plan should be updated to reflect this change.

7. Spatial Framework for onshore wind farms

Proposed change - The Spatial framework for onshore wind farms should be presented in the local development plan.

Reason – To accord with paragraph 161 of Scottish Planning Policy.

8. Policy 5 – Heat Networks

Proposed change - The plan should refer to heat mapping to inform proposals as to where the opportunities for making use of heat sources might be. District heating need not be restricted to only major development or areas where there is a heat source or existing network. Taking that approach means that smaller developments more isolated from existing heat sources or networks are not encouraged to also consider the potential for district heating.

Reason – To accord with paragraphs 158 and 159 of Scottish Planning Policy.

9. Policy 6 – Low and Zero Carbon Generating Technology

Proposed change - Policy 6 should specify a proportion of greenhouse gas emissions to be saved through the use of low and zero-carbon generating technology as well as specifying when that proportion will increase (even if not going so far as to say what the increase will be). Examples of the policy Approach include the Dundee City Local Development Plan.

Reason – To accord with Section 3F of the Town and Country Planning (Scotland) Act 1997.

10. Policy 10 – Promoting Sustainable and Active travel

Proposed change - Policy 10 should clearly promote travel in the following order of priority: walking, cycling, public transport, cars. Taking the approach set out in Scottish Planning Policy principal policy on Placemaking, development that is easy to move around and beyond should consider place and the needs of people before the movement of motor vehicles. As currently worded the policy sounds like active travel is something to add into a design rather forming the basis of it.

Reason – The policy needs to more clearly prioritise the movement of people by sustainable means to accord with Scottish Planning Policy paragraph 46 and 273.

11. Policy 38 – Path Network

Proposed change - Policy 38 requires new paths only where applicable. This does not go as far as Scottish Planning Policy paragraph 273 would suggest in terms of promoting opportunities for active travel. The policy should be more clear about when new paths will and will not be needed.

Reason – To better align with paragraph 273 of Scottish Planning Policy.

12. Action Programme - Town Centre Strategies

Proposed change – The Action Programme should contain a commitment that town centre strategies will be prepared.

Reason – To align with SPP para 65.

13. Policy 31 & Para 10.9 – Scheduled Monuments and Archaeological Sites

Proposed change – Policy 31, first sentence, should instead read “Development that would potentially have an adverse effect on the setting of a Scheduled Monument will only be permitted in exceptional circumstances”. Further, amend paragraph 10.9 to state: “Scheduled monuments are of national importance and, as such, have a high level of protection with a separate consent system being administered by Historic Environment Scotland (HES). Any works directly affecting a designated scheduled monument requires Scheduled Monument Consent (SMC) which is obtained from HES. Advice on the SMC process and requirements should be sought at an early stage from the Heritage Directorate, Historic Environment Scotland, Longmore House, Salisbury Place, Edinburgh, EH9 1SH. Telephone: 0131 668 8716 or email: hmenquiries@hes.scot”

Reason – The policy issues here are conflated. Local planning authorities have no remit over direct impacts on scheduled monuments as Historic Environment Scotland are the consenting authority for Scheduled Monument Consent. The local planning authority only have a remit over unscheduled archaeology and the setting of scheduled monuments as this is a material consideration in the assessment of planning applications.

14. Page 33, Para 9.9 - Minerals Extraction

Proposed change – Whilst there are no mineral extraction sites identified in Inverclyde, the reference to mineral extraction in the proposed plan makes no reference to safeguarding all workable mineral resources as required by SPP para 237. It should be updated to do so.

Reason – To ensure it aligns with SPP para 237 and that future workable resources are not sterilised by other development. This commitment to minerals is reflected in the Clydeplan SDP.

I trust these comments are of use.

Yours sincerely

Matthew Shepherd
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