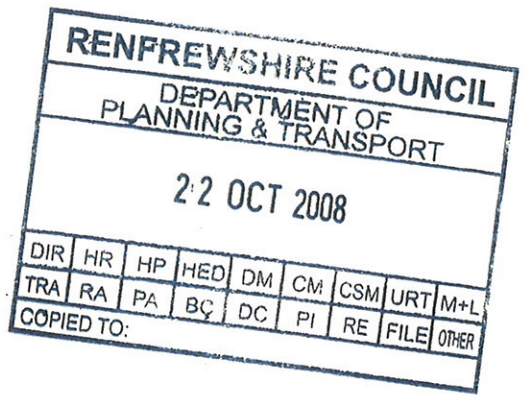


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20 October 2008

Mr Bob Darracott
Director of Planning and Transport
Renfrewshire Council HQ
South Building
Cotton Street
Paisley
PA1 1LL



Dear Sir

**The Environmental Impact Assessment (Scotland) Regulations 1999 Planning Application Accompanied By An Environmental Statement Redevelopment of Royal Ordnance Factory, Bishopton
Outline Planning Application Reference: 06/0602/PP**

I refer to the letter dated 22 September 2008 from Mr G.C. Russell, Head of Planning, my subsequent telephone conversation with him on 16 October 2008 following my late receipt of the relative documents submitted by BAE/Redrow in respect of the above matter and previous submissions thereon on behalf of Houston Community Council.

Attached hereto are comments on certain matters contained within the Environmental Statement which Houston Community Council consider should be addressed before any final decision is made on the redevelopment of the former Royal Ordnance Factory site.

As intimated in previous communications relative to this matter Houston Community Council aligns closely with all other bodies opposed to development of the site and wish to point out that comments in the attached statement should be viewed from a Houston perspective. These comments are based on the premise that all procedures relating to remediation within the proposed development area will be rigorously implemented and

properly supervised by the Regulatory Authority should planning consent be fully approved.

Yours Sincerely

A rectangular area of the document is redacted with a solid yellow background, obscuring the signature of the sender.

pp/Houston Community Council

**Houston Community Council
Responses to Environmental Statement
Royal Ordnance Factory Site, Bishopton
Planning Application Reference: 06/0602/PP**

There are three main areas related to the redevelopment of the former Royal Ordnance Factory site which are still matters of concern to Houston Community Council. These are:

1. The roads network surrounding Houston and the site
2. The development of a landfill within the site
3. Pollutants extending from the site to surrounding areas as the result of any redevelopment of the site

The Roads Network

As intimated in previous submissions relative to this application there is concern over the likely increase in HGV traffic through Houston and the adjacent settlements resulting from the proposal to construct a haul road through the site off the B789 road which is a main "feeder" road from Houston to Inchinnan/Erskine/Bishopton/Renfrew.

This road already carries a considerable volume of HGV traffic moving materials from a quarry in Reilly Road via Turningshaw Road and B789/B790. Any increase in such forms of transport is considered unacceptable given the relatively narrow width of the B789 and the continuous requirement to effect repairs to road damage caused along the full length of the road by existing HGV and other users.

In previous submissions reference has been made to the limited headroom (3.8 metres/12'6") of the Rail and M8 Motorway bridges which span the B789 towards its eastern end and the fact that the road between the bridges and the

proposed access point to the haul road within the site is serpentine. Two particularly sharp bends in the road at Netherfield Farm which is approximately 250 metres from the proposed access to the site are relatively hazardous and the most westerly bend provides limited vision to drivers proceeding in that direction into a long straight section of road which tends to encourage speed.

The entrance to Moss Road is approximately 250 metres further west of the proposed site access and although this road is closed to through traffic it carries local traffic to/from properties therein or adjacent thereto.

There are likely to be situations arising from speeding motorists within the vicinity of the site access and some consideration should be given to traffic control when this access point is created. Flashing lights similar to those used at Fire Stations and other high risk locations might be considered to alert users of the B789 to the emergence into the road by vehicles from the site. Such warning lights could be activated automatically as vehicles prepare to leave the site and function for a predetermined time thereafter.

Re-opening the Moss Road would to some extent reduce HGV usage of the B789/B790 through Houston and Crosslee by diverting it through Linwood and although likely to be a costly project should be further investigated.

The B789 is described in the Transport Assessment Report submitted by JMP Consultants Limited when they reported on the existing Local Road Network – paragraph 2.24:

“The rest of the road network in the proximity of Bishopton is of relatively low standard in road hierarchy terms. The B789 to the south provides access to the village of Houston and the south west sector of Renfrewshire. There is an unclassified road which lies to the west between the site and the Formakin Estate. In comparison to the A8, these routes have a lower

standard of geometric characteristics including road widths, vertical and horizontal alignment.”

Given that the proposed redevelopment of the site will run between 2009-2023 with the haul road within the site being operational throughout the period it is essential that serious consideration be given to the transport situation to ensure that there is limited interference in the daily business and likely effect that this will have on the resident population of Houston Village and the broader Community of Houston.

The Proposed Landfill

The development of a landfill within the site has been an issue of concern to Houston Community Council since the initial stages of the proposals to redevelop the site. This stems from the proximity of the landfill to the outer environs of Houston Village and the adjacent farming community. The landfill being planned for the duration of the redevelopment will obviously increase in size as materials from the site are deposited within and it must be managed rigidly.

The most recent documentation from the developers suggests that only non-toxic materials will be placed in the landfill and that materials previously contaminated by residues from the explosives manufacturing processes would be sanitised before disposal. Assuming that the contents of the landfill will solely originate from within the site itself and will not come from any sources outwith it is essential that the regulatory bodies, presumably the Health and Safety Executive, SEPA and Renfrewshire Council, ensure that records of materials placed in the landfill are rigorously maintained and that there is no laxity in supervision given the expected duration of the project and that they ensure the

adoption of any changes which may be made to the legislation relating to the care and maintenance of landfill sites.

We as a caring Community must be assured that the proposed landfill will not turn out to be a “ticking ecological bomb” for future generations as the result of poor management of the site. Any laxity in security by the developers or in supervision by the regulatory bodies could be used to advantage by unscrupulous individuals who might wish to gain access to the landfill to dispose of unknown and uncontrolled materials.

Pollution

The issue of pollution from within the site is something which has previously been open to discussion between the various parties involved in the proposals to redevelop the site.

Many of the issues which were originally raised appear to be explained within the procedural documents BAE/Redrow have submitted recently. However, these are very technical documents which will require close examination to satisfy specialists and the experts engaged by the various bodies of objectors to the redevelopment of the site. Taken at face value it is possible that if these proposals are considered to be viable and are fully implemented it may allay concerns about the whole matter of redevelopment.

The concerns about windblown particulate matter resulting from burning may now be of less concern as it is understood that some contaminated buildings, presumably within the primary development area, are currently being or have already been burned, without, so far as is known any adverse effects.

There are still areas of concern surrounding watercourses, surface water, the contents of the picrite lagoons and other liquid storage locations within the site.

Assurances given in the documents imply that site testing of surface and foul water drains which may/may not run into watercourses are being adequately dealt with to prevent toxic matter accessing the local rivers. Allowing for the fact that the Black Cart enters the Rivers Clyde at Renfrew and that the Clyde is affected by tidal movements it is reasonable to assume that the Black Cart with its tributary the Gryffe will also be affected by tidal movement then any toxic/noxious effluent from the site could be dispersed up-river in the Gryffe with resultant ecological damage.

It is rumoured locally that below-standard quality explosive materials were illegally disposed of in drains and sewers throughout the site by process workers in the latter years of explosives manufacture. Whilst there may be no way of proving the claims it is absolutely essential that the potential developers are made aware of such allegations to ensure that nothing of this nature occurred if for no reason other than the safety of site workers. They must also ensure that nothing exists within sewers or storage pools which is likely to filter through disused drains, the soil, or from any other sources which will pose a threat to public health or the environment through entry to the many watercourses within the site and subsequently the local rivers.

Whilst the redevelopment of the site is much more contentious within Bishopton and its environs the issues raised by Houston Community Council are those which are most likely to directly affect the broader Houston Community and the Community Council on its behalf will continue to express concern about the proposals to redevelop the site.