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RENFREWSHIRE COUNCIL
DEPARTMENT OF
PLANNING & TRANSPORT

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Please quote our reference number on all correspondence

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Your Ref: 06/0602/PP

Ref: CNS/EIA/R

13 November 2008

For the attention of David Bryce

Dear Sirs

THE ENVIRONMENTAL IMPACT ASSESSMENT (SCOTLAND) REGULATIONS 1999

**OUTLINE APPLICATION FOR THE REDEVELOPMENT OF THE ROYAL ORDNANCE
FACTORY, BISHOPTON, RENFREWSHIRE**

Thank you for consulting Scottish Natural Heritage (SNH) over the amendments and additions to the Environmental Statement (ES) and associated documents relating to the above proposal. I hope that you will find the following comment to be of use.

1. BACKGROUND

SNH were originally consulted during 2006 over an outline application and associated ES for the decontamination and redevelopment of a 923ha area of the old Bishopton Royal Ordnance Factory (ROF) site. Our consultation response dated 18 December 2006 gave a full appraisal of the likely natural heritage impacts of the proposal as then detailed, as well as listing a number of conditions and recommendations that we believed would be required in order to ensure that these impacts were made acceptable.

The material currently submitted to us for consultation includes a number of documents associated with the overall ES which have been updated to take account of subsequent changes to the proposal. It is SNH's understanding that these changes include (though are not strictly limited to):

- Changes to the phasing of the remediation and redevelopment of the site, with many elements apparently brought forward to some degree.

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- Changes to the Access Strategy for the project, including the decision to bring the proposed eastern (often described as "southern" in the ES and associated documents) access road into operation as an initial phase of development, prior to the development itself becoming occupied, and the deletion of the proposed pedestrian bridge over the railway line.
- Changes to the site drainage strategy. Many of the previously proposed water bodies will either be removed, reduced in extent, or replaced by reed beds. A new foul water drainage strategic pumping station is also proposed.

In addition to these amended and updated documents, material has also been provided in response to some of the points raised and recommendations made in our earlier consultation response with regard to the likely landscape and visual impacts of the proposal. In particular, a paper has been provided as requested considering alternative options for the provision of a northern access road.

3. SNH APPRAISAL OF THE LIKELY NATURAL HERITAGE IMPACTS OF THE PROPOSAL IN LIGHT OF THE PROPOSED AMMENDMENTS AND ADDITIONAL INFORMATION PROVIDED

3.1 Ecological

The proposed alterations to the site drainage scheme may have some minor natural heritage implications – e.g. the provision of reed bed habitat in place of previously proposed open water – however as a whole, the proposed changes will make minimal difference to the identified ecological impacts of this proposal as a whole. SNH's position with regard to these impacts, and the ways in which they should be managed and mitigated, therefore remains exactly as stated in our consultation response of December 2006.

3.2 Landscape & Visual

In addition to the planning conditions which SNH believe will be required to ensure that any negative landscape and visual impacts arising from detailed proposals which eventually come forward are minimised, our consultation response of December 2006 also detailed our concerns relating to impacts that are likely to arise from the proposed northern access road linking the new development to the A8 Greenock Road. We therefore recommended that prior to any decision being reached in terms of the outline application, the applicants should be required to provide a more detailed consideration of alternative solutions and mitigation options for this new access link – to be agreed by the Planning Authority in consultation with SNH. Such a consideration has now been provided as an appendix to the paper *Response to Comments on the Environmental Statement Relating to the Landscape and Visual Resource*. The paper itself also contains information addressing some of the other points relating to landscape and visual impacts which were raised by SNH in our previous consultation response.

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Full SNH comment on this paper can be found as an appendix to this response. I can confirm however, that in SNH's view the appendix on alternative route alignment options for the new road does indeed demonstrate that the applicant's preferred option will lead to the least landscape and visual impacts of the alternatives considered. We do however, have outstanding concerns that the analysis did not proceed to a consideration of the means by which the impacts arising from the various options could be mitigated. Thus it may be that the impacts of one of the rejected options could in fact be better mitigated than those of the selected route. We would therefore advise that the applicants be required to add a consideration of the means by which the landscape and visual impacts of the northern access road could be mitigated to their consideration of the options.

SNH's position with regard to the wider landscape and visual impacts of the rehabilitation and redevelopment proposal as a whole however, remain largely as stated in our original consultation response. Namely that any outline permission for the proposal should be made subject to conditions that both a woodland clearance and retention plan for the full application site, and a structural landscape elements plan for the development area of the site, be produced and agreed prior to any relevant works commencing.

3.3 Recreation & Access

The only aspect of the amendments to this proposal with the potential to notably impact on recreation and access is the deletion of the proposed pedestrian bridge over the existing railway. However, as some traffic linkages will no longer be required (e.g. along Newton Road), these links will now be promoted as a key pedestrian and cycle routes. As such, SNHH believes that the net impacts on recreation and access will be negligible.

SNH notes that BAE System's Environmental Test Facility area has been removed from the area covered by the applicant's Community Woodland Management Strategy, however as public access to this area was always going to be extremely limited, this will not materially affect the recreation and access improvements that the Community Woodland will eventually provide. As a result, our views with regard to the recreation and access implications of the proposal as a whole remain as detailed in our earlier consultation response.

I hope that the above is sufficient to your requirements, however please do not hesitate to contact me if there is any aspect of the above which you would wish to discuss further.

Yours faithfully

DAVE LANG
Area Officer
Strathclyde and Ayrshire

Encs

SNH COMMENT ON THE APPLICANT'S PAPER RESPONSE TO COMMENTS ON THE ENVIRONMENTAL STATEMENT RELATING TO THE LANDSCAPE AND VISUAL RESOURCE

Chapter 2. Landscape Character Types

Section 2.1 of the applicant's paper states that, "SNH requested that reference was made to the 'Rugged Upland Farmland' landscape character type as identified in the Glasgow and Clyde Valley Landscape Assessment". The paper then goes on to demonstrate how the proposals for the site are in keeping with the Planning and Management Guidelines for that landscape character type found within that document.

SNH did indeed point out in our consultation response that the northern and western fringes of the application site edge into this landscape character type, and that this did not appear to have been recognised in the Environmental Assessment. However this was largely to illustrate that the consideration of landscape character appeared to have been very much secondary to the consideration of visual impacts. In particular, there had been no attempt to further subdivide the application site itself into local detailed landscape character areas which could then be used to help determine the most appropriate designs for localised elements of the development.

While the applicants have now satisfactorily demonstrated that the broad proposals will not be significantly out of keeping with the wider landscape character, the material provided does not actually address the above concern.

SNH has accepted however that the outline nature of the application means that it is not strictly necessary to address this issue in detail at this stage. We do however continue to advise that any outline permission for the proposal as a whole should be conditional on the applicants producing a woodland clearance and retention plan for the full application site, and a structural landscape elements plan for the development area – both prior to any relevant works commencing on site. The detailed proposals in these plans should be guided by an identification and consideration of the local landscape character areas within the application site.

Chapter 3. The Formakin Estate

In SNH's consultation response to the ES for this proposal we noted our concern that a detailed consideration of landscape and visual impacts on the Formakin Estate and associated Historic Garden & Designed Landscape Inventory Site had not been included. From the material provided, it was not possible to determine the likely impacts on the full area covered by the Inventory listing, however as it was our view that there would be relatively little landscape and visual impact on the core part of the Formakin Estate itself, this lack of analysis was not considered significant enough to give rise to a point of objection.

The additional material submitted by the applicants does now provide fuller details of the likely landscape character and visual impacts relating to the Formakin site. I should advise your Council however that as a result of changes to Government policy, SNH no longer retains a remit for the protection and enhancement of Historic Garden & Designed Landscape Inventory Sites. Our previous responsibilities for such sites have been transferred to another government agency, Historic Scotland, and it will now fall to them to advise on the impacts to the Formakin Estate Inventory site - as discussed in the applicant's paper - should they consider it to be required.

Chapter 4. Northern Access Road Route Alignment Options

SNH's view with regard to the proposed northern access road to the new development site - as stated in our consultation response to the ES - was that the design appeared out of keeping with the character of existing roads in the area and the local landscape character. Other routes in the locality tend to be either narrow and winding, or very straight where they run across the floodplain or along ridgelines. However the northern access road proposed in the outline application followed a smooth geometric curve, using a combination of cuttings and embankments to negotiate the underlying topography. It was felt that this new road would extend the influence of the development north into the 'buffer' of retained agricultural land, and would therefore comprise a relatively significant urbanising feature. Furthermore, the ES did not provide a discussion of alternatives that had been considered (if any) - either in terms of the access provision itself, or of the mitigation options that were available.

At the request of SNH, some further justification of the routing of this access road had been provided by the applicants in November 2006. While the paper submitted at that time did go some way to explaining the preferred choice of route, it still did not constitute a full consideration of alternatives and mitigation options. Though not of sufficient concern to constitute a point of objection in principle, SNH therefore suggested in our response to the outline application consultation that the applicants be required to undertake further consideration of the full range of routing and mitigation options for this access - including the possibility of creating alternative access into the northern part of the existing town of Bishopton, and/or the adoption of a less engineered alignment along the preferred route to the north. At the least, it was hoped that this might lead to optimal mitigation being put in place for the eventual option pursued.

Chapter 4 of the paper now submitted by the applicants refers to an appendix intended to address this request. This paper describes three potential routing options that were considered to link the Greenock Road / A8 with a point at the northern end of the proposed new development area and discusses their relative landscape and visual impacts.

While it could be argued that the options described in this paper do not really represent genuinely significant alternative solutions to the requirement for access provision to the new development, SNH does agree with the main conclusions drawn in this paper and with the selection of Option C as the route which will have the least impact of the three prior to any mitigation being provided.

In terms of mitigation however, there is still very little detail or discussion of alternatives provided, and SNH would have preferred this analysis to have been taken a stage further. In addition to identifying the likely impacts of each option, the possibility of mitigating these impacts through screening or other management should also have been considered. It is conceivable that had this been done, a different option might have arisen as the one resulting in the least impacts post-mitigation.

Tree planting is proposed to screen all three options, but this is simply intended to follow the full route of the new road, rather than as an attempt to mitigate the specific impacts of any particular option. It is also suggested by the applicants that screen mounding could be used to assist with screening and integration, however this has unfortunately not been considered in any detail.

It is suggested in Section 1.7 of the appendix however, that mitigation details could be provided by the applicant at a later stage. SNH continues to believe that the provision of this access road has the potential to be one of the most significant elements of the wider development in terms of visual and, in particular, landscape impacts, and we would therefore strongly advise that detailed proposals to mitigate these impacts are indeed provided.