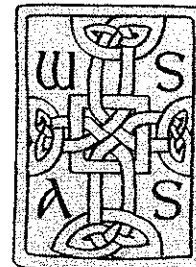


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Date: 27 August 2009
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WEST of SCOTLAND ARCHAEOLOGY SERVICE



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FAO: David Bryce

Dear Sir

Planning Application 09/0527/PP: Engineering operations comprising remediation and bulk earthworks, Royal Ordnance Factory, Station Road, Bishopton.

I write in response to your request for observations on the above application, details of which were sent on 17 August 2009, along with the Environmental Statement and associated documents and appendices submitted in support of the application.

As you know, the application boundary includes the site of the former Bishopton Royal Ordnance Factory and the earlier site of the First World War period munitions factories of Georgetown. Together, the remains of these factories are important to the history of the production of military propellants and explosives and to our understanding of the development and refinement of ammunition manufacture and filling processes. The structures associated with the factories represent an extensive complex of great interest to the study of the development of the armaments industry during the twentieth century.

In addition to the identified remains of the munitions factories, there is the possibility that other, previously unrecorded archaeological remains may survive within the application boundary. While significant sites from earlier periods have not been shown to exist within the boundary of the proposed development, the secure nature of the operations on the site has ensured that it has been under-surveyed in archaeological terms since before the establishment of modern archaeological prospection. Cartographic evidence suggests that some of the former farmsteads within the application area may have been occupied from the medieval period at least. There have also been a number of chance finds of artefacts from the application site, and the recovery of these and the identification of two crop mark sites on aerial photographs suggests that there is potential for previously unrecorded archaeological remains to survive as buried features. While the construction and operation of the Ordnance Factories will have caused major ground disturbance in many areas, the deleterious effects on buried deposits and remains are likely to be localised, so may have damaged rather than destroyed whole archaeological sites. Because of this, and due to the less intensive use of those areas within the factory boundary that were not being used for munitions purposes, there is a moderate chance of the survival of buried pre-modern remains of significance.

I note that the archaeological element of the Environmental Statement, which appears unchanged from that which was prepared in 2005, comes to the same conclusion with regard to this possibility, and that amongst other recommendations, it suggests that the issue of

previously undiscovered archaeological remains be addressed through a process of intrusive field evaluation tied in to the development programme. While I do not agree with all of the archaeological contractor's detailed assessments of the archaeological sensitivity of the known features, which has a knock-on effect on their rating of significance of the impacts on the cultural heritage, the level of disagreement would not affect the overall conclusions reached. I therefore concur with their view that none of the impacts is so severe as to warrant refusal of the application, nor so severe as to require the preservation *in situ* of the known cultural resources which the proposals would affect directly.

Consequently, I can recommend that the cultural heritage issues raised by this application can best be addressed through the attachment of a suitable condition to any consent the Council is minded to grant. I believe that this would be in accord with central government planning policy, most recently set out in Scottish Planning Policy 23, Planning and the Historic Environment (SPP 23) and elaborated on in the older Planning Advice Note 42 (PAN 42), and the Council's policies for the environment.

The only appropriate form of condition in circumstances such as these is a negative suspensive condition such as that recommended in paragraph 34 of PAN 42, although the wording in the model suggested in the PAN is now out-of-date and can be misleading to developers and their agents. Because of this, and because of the complexity of the proposed remediation programme, I recommend the following wording which reflects current best practice for the management of complex projects:

"Prior to the commencement of development the developer shall submit for the Council's approval an archaeological mitigation strategy. Thereafter the developer shall ensure that the approved strategy is fully implemented and that all recording and recovery of archaeological resources within the development site is undertaken to the satisfaction of the Planning Authority in agreement with the West of Scotland Archaeology Service."

The use of this condition would allow the Council to ensure that the correct level of mitigation fieldwork is undertaken and reported on throughout the remediation and earthmoving programme should consent be granted.

However, I wish to make you aware of two points of concern which I have noted from my review of the Environmental Statement and its associated appendices and reports.

Firstly, specimen programmes for different elements of the proposed works have been presented where the cultural heritage concerns and mitigation measures proposed in section 15 of the Environmental Statement have not been included. For example, the proposed programme for Building Decontamination Burn of former ordnance factory structures includes no provision for assessment of the need for, nor does it identify a timeframe and the resources which would be necessary to carry out archaeological building recording before the stripping of fittings and the preparation of the building for burning. This is a clear omission, as the programme does include a risk assessment phase to establish whether safe access can be made to the structure before works commences. I would have expected the archaeological recording phase to follow immediately after this, before any work to ready the building for burn and demolition. The absence of a historic building recording phase of work in the draft demolition programme is a major concern which reflects poorly on the integration of the cultural heritage requirements of the project into the substantive work programme.

Secondly, the archaeological contractor's section 15.51 of the Environmental Statement draws attention to the highly significant and rare narrow-gauge railway within the Royal Ordnance Factory as an archaeological feature, additionally stating that "The tracks remain *in situ* in many places". This statement, written in 2005, seems to be contradicted by the applicant's final Remediation Strategy (2009), where it is stated in the Site Conditions - Built

Infrastructure section of the Executive Summary that "Formerly, a rail network was also present, but has been removed." This Service received no advance notification from the applicant's archaeological contractors of recording work having taken place prior to the removal of the rail system, nor has a report on any such work been submitted in retrospect to the Sites and Monuments Record which we maintain on behalf of the Council. I must therefore conclude that the removal of the elements of this highly significant industrial archaeological feature was carried out without archaeological mitigation, against the spirit of the stated intentions in the documentation supporting past and current applications

While I accept that the Council may be without a locus to control such action prior to determining in favour of an application for planning consent, I would wish to remark that the applicants' apparent failure during their decommissioning works to give any consideration to cultural heritage matters referred to in their own statement of intent again reflects poorly on their treatment of this matter at the pre-determination stage.

I would be most grateful if this apparent omission could be communicated to the applicants and their agents to ensure that their stated aspirations of successfully managing the archaeological mitigation of the adverse cultural heritage effects of their proposals can be achieved without further unrecorded losses.

Lastly, I would recommend that you insist that the provisions for archaeological recording measures referred to in the applicant's own documentation should be fully integrated into the revised drafts of work programmes covering the site remediation and earthmoving operations, including preparatory work elements, so that similar, presumably accidental omissions in the proposed recording scheme can be avoided during future decommissioning or remediation work. To this end, it would be useful if the applicants were to produce their archaeological mitigation strategy as soon as possible in support of the application. Furthermore, it would increase confidence in the applicants' project management provisions and cultural heritage *bona fides* if the methodologies to be used in their archaeological mitigation strategy and the relevant internal project communication mechanisms were agreed as a matter of urgency and voluntarily implemented immediately, even if prior to determination of this application.

As always, if there is any point made above on which you require further discussion or clarification, or if you would like me to meet or advise the applicants or their agents directly on your behalf, please contact me by telephone on 0141 287 8332, or by email at hugh.mcbrien@wosas.glasgow.gov.uk

Yours faithfully



West of Scotland Archaeology Service