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**From:** Bell V (Victoria) on behalf of ms.majorprojects@gov.scot  
**Sent:** 31 October 2016 10:33  
**To:** citydeal@renfrewshire.gov.uk  
**Cc:** McLean, Rebecca (Rebecca.McLean@sweco.co.uk)  
**Subject:** CWRR City Deal – Scoping Response

Dear Rebecca,

Having sought advice from our Marine Scotland Science (MSS) colleagues, MS-LOT request that the following points be included in the scoping opinion:

### **Marine mammals**

Whilst the River Clyde at Yoker/Blythswood is distant from the estuarine environment of the Firth of Clyde where seals and porpoises are frequently observed, it is possible that these animals may sometimes occur in the river. Indeed, the scoping report mentions historic sightings of harbour seals, grey seals and harbour porpoises in the vicinity of the proposed development. As seals and porpoises are protected in Scottish waters under Scottish and EU legislation, we encourage the applicant to include measures to avoid disturbance or injury to these animals in the full Environmental Statement. The primary impact pathway for effects on marine mammals here would be from loud underwater noise, e.g. from pile driving. We would anticipate the applicant to delay pile driving if seals or cetaceans are sighted close to the site of construction.

### **Physical environment**

The plan is to build a new opening bridge across the river Clyde, a swing bridge of twin leaf design. It is stated that new bridge designs will be designed wherever possible to avoid in channel structures. But it also states that the new bridge will be supported on piled reinforced concrete piers and abutments. The design is likely to require construction of in river piers to support the swing bridge leafs although these would be located close to the river banks. In that case the crossing structure will impact the physical environment both during construction and operational phase. An assessment of the effects of the Clyde crossing design on water level will already be included in the detailed FRA but all aspects of impacts on the physical environment should be taken into account.

### **Diadromous fish**

This request refers to the Clyde Waterfront and Renfrew Riverside Scoping Report which is one of a pair of scoping reports, the other being the Glasgow Airport Investment Area Scoping Report. MSS provided fairly detailed comments to MS-LOT at an earlier stage on 5 February and, as the scoping report correctly notes, a pre-scoping meeting of MSS with Sweco in relation to diadromous fish took place on 2 June. A useful minute for the meeting was provided by Sweco which we amended and returned. MS-LOT also received a copy.

It is already known that under some conditions large numbers of returning adult salmon or sea trout can be present in these tidal reaches and lower reaches of the rivers and may already be stressed there by poor water quality / high temperatures / low river flows. Large numbers of salmon and sea trout smolts can also pass through these areas in spring and these are also likely to be stressed and vulnerable to further disturbance in similar river conditions as affect adult salmon. Fish kills have occurred in this area, particularly in summer. Particularly under conditions when salmon or sea trout are or are likely to be in these reaches, it will be very important that

how work which could impact on salmon or sea trout is scheduled and carried minimises the possibility of any impact.

Regarding whether specific survey effort in relation to migratory salmonids would be required in support of the ecological assessment, this report does not appear to make any definite statement. MSS would accept that detailed pre-construction site characterisation work, for example involving catching and tracking salmon or sea trout adults or smolts through the reaches could be expensive, although it would provide useful information. MSS would like to see what advice the Clyde River Foundation, SEPA and SNH give or have given on this topic before it gives a final view.

MSS notes that the Clyde River Foundation is included in the main consultation list in this report, which is good.

## **Aquaculture**

There are currently no marine aquaculture sites registered with Marine Scotland Science located in the vicinity of the proposed Clyde Waterfront Renfrew Riverside development. There is one freshwater land based tank site located approximately 8km south east of the proposed development which is authorised to hold a variety of freshwater finfish species. This facility uses mains water therefore it is not expected that it would be impacted by the proposed development.

The nearest marine finfish site is situated ~50km west of the proposed development and is an active Atlantic salmon site operated by The Scottish Salmon Company.

## **Navigation**

Please refer to comments received from the Maritime and Coastguard Agency, Northern Lighthouse Board and Peel Ports.

Kind regards,

Vikki

Victoria Bell  
Marine Licensing Casework Manager

**Marine Scotland** - Marine Planning & Policy – Licensing Operations Team – Major Projects  
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

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Email: [ms.majorprojects@gov.scot](mailto:ms.majorprojects@gov.scot)  
Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



# Northern Lighthouse Board

**CAPTAIN PHILLIP DAY**  
**DIRECTOR OF MARINE OPERATIONS**

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Your Ref: Email – EIA – CWRR Scoping Report  
Our Ref: GB/OPS/ML/R8\_01\_016

City Deal Team (Renfrewshire)  
Development and Housing Services  
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Cotton Street  
PAISLEY  
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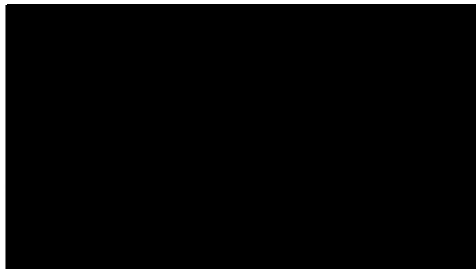
06 October 2016

Dear City Deal Team (Renfrewshire)

**MARINE WORKS (EIA) REGULATIONS (SCOTLAND) 2007**  
**CITY DEAL RENFREWSHIRE – SCOPING REPORT – CLYDE WATERFRONT**  
**AND RENFREW RIVERSIDE PROJECT**

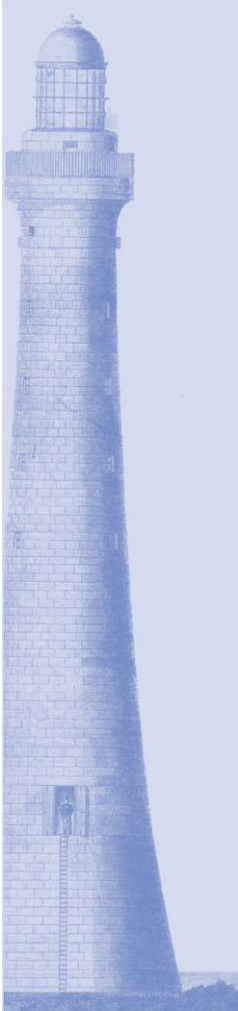
Thank you for your e-mail correspondence dated 22 September 2016 regarding the Scoping Report submitted by **City Deals Renfrewshire** in support of a planning consent for a new opening bridge and associated road infrastructure across the River Clyde near Dock Street, Yoker and Blythswood, Renfrew.

Northern Lighthouse Board has no objections in principle to the proposed development, and will reply formally in response to the required Marine Licence application, however we would advise City Deals Renfrewshire to liaise with Peel Ports (Clydeport) to ensure they are content with the proposals.



For the safety of

Certified to: ISO 9001:2000 · The International Safety Management Code (ISM) · OHSAS



Our ref: PCS/149166  
Your ref:

If telephoning ask for:  
Julie Gerc

24 October 2016

Renfrewshire Council  
Planning & Transport  
Renfrewshire House  
Cotton Street  
Paisley  
PA1 1LL

By email only to: [citydeal@renfrewshire.gov.uk](mailto:citydeal@renfrewshire.gov.uk)

Dear Sir

## **Clyde Waterfront and Renfrew Riverside project Scoping Report City Deal Renfrewshire**

Thank you for consulting SEPA on the scoping opinion for the above development proposal by way of your email which SEPA received on 23 September 2016. We would welcome engagement with the applicant at an early stage to discuss any of the issues raised in this letter.

We consider that the following key issues must be addressed in the Environmental Impact Assessment process. To **avoid delay and potential objection** the following information must be submitted in support of the application.

While all of the issues below should be addressed in the Environmental Statement (ES), there may be opportunities for several of these to be scoped out of detailed consideration. The justification for this approach in relation to specific issues should be set out within the ES. We would welcome the opportunity to comment on the draft ES. Please note that we can process files only of a maximum size of 25MB and therefore, when the ES is submitted, it should be divided into appropriately sized and identified sections.

### **1 Flood Risk**

- 1.1 The site should be assessed for flood risk from all sources in line with Scottish Planning Policy (Paragraphs 254-268). The [Flood Maps for Scotland](#) are available to view online and further information and advice can be sought from your local authority technical or engineering services department and from our [website](#).
- 1.2 If a flood risk is identified then a Flood Risk Assessment should be carried out following the guidance set out in the document [Technical flood risk guidance for stakeholders](#).

## 2 Waste Water Drainage

- 2.1 Details of the waste water provision for your development should be provided in the ES or planning submission, including consideration of options for waste water treatment facilities. Drainage is a material planning consideration and will be assessed as part of your planning application in line with [PAN 79 Water and Drainage](#) and your Local Plan. Where there is a public sewerage system, waste water drainage from development should be directed to that system. If the system has insufficient capacity, then early dialogue with Scottish Water will be required to determine if works are planned to overcome this problem, or what developer pro-rata contributions will be necessary to remove the constraint.
- 2.2 If there is no or limited public sewerage infrastructure, given the scale of development we would still expect the development of strategic infrastructure to adoptable standards. Contact should be made with Scottish Water to determine the standards required to ensure adoption of new infrastructure. Please note that we are not likely to support proposals for private foul drainage systems for significant development (e.g. more than 25 houses) where development of public infrastructure is the sustainable long-term solution. An interim solution may be acceptable provided an appropriate upgrade has been agreed with Scottish Water and there will be no unacceptable impact on the water environment. For further guidance please refer to our [Policy and Supporting Guidance on Provision of Waste Water Drainage in Settlements](#)

## 3 Surface Water Drainage

- 3.1 The treatment of surface water runoff by sustainable drainage systems (SUDS) is a [legal requirement](#) for most forms of development, however the location, design and type of SUDS are largely controlled through planning. We encourage surface water runoff from all developments to be treated by SUDS in line with Scottish Planning Policy (Paragraphs 255 and 268), [PAN 61 Planning and Sustainable Urban Drainage Systems](#), [PAN 79 Water and Drainage](#). SUDS help to protect water quality, reduce potential for flood risk and release capacity in the public sewerage network where the alternative is use of combined systems. Discharges to combined sewers should be avoided to free up capacity for waste water discharges.
- 3.2 It is important to ensure that adequate space to accommodate SUDS is incorporated within development. Consideration should be given to this matter early in the planning process when proposals are at their most fluid and modifications to layout can be easily made with less expense to the developer. Each individual type of SUDS facility, such as a filter drain, detention basin, permeable paving or swale, provides one level of surface water treatment. The level of SUDS required is dependant on the nature of the proposed development, for example residential or non residential, the size of development, and the environmental risk posed by the development which is principally determined by the available dilution of the receiving waterbody. Best practice requires the following levels of treatment
- Industrial developments require three levels of treatment for hard standing areas and two levels of treatment for roads. An exception is run-off from roofs which requires only one level of treatment. We recommend, as best practice, the second level of treatment to be a basin or pond designed in accordance with Sewers for Scotland Second Edition. Please also refer to section 3.3 below;
  - All roads schemes typically require two levels of treatment, except for residential developments of 50 houses or less and retail/commercial/business parks with car parks of 50 spaces or less. For technical guidance on SUDS techniques and treatment for roads please refer to the [SUDS for Roads](#) manual.

- 3.3 For all developments, run-off from areas subject to particularly high pollution risk (e.g. yard areas, service bays, fuelling areas, pressure washing areas, oil or chemical storage, handling and delivery areas) should be minimised and directed to the foul sewer. Where run-off from high risk areas cannot be directed to the foul sewer we can, on request, provide further site specific advice on what would be the best environmental solution.
- 3.4 The SUDS treatment train should be followed which uses a logical sequence of SUDS facilities in series allowing run-off to pass through several different SUDS before reaching the receiving waterbody. Further guidance on the design of SUDS systems and appropriate levels of treatment can be found in the CIRIA C753 manual entitled [The SUDS Manual](#). Advice can also be found in the SEPA Guidance Note [Planning advice on sustainable drainage systems \(SUDS\)](#). Please refer to the [Regulations section](#) of our website for details of regulatory requirements for surface water and SUDS. Comments should be sought from the local authority roads department and the local authority flood prevention unit on the acceptability of post-development runoff rates for flood control.
- 3.5 Comments from Scottish Water should be sought where the SUDS proposals would be adopted by them. We encourage the design of SUDS to Sewers for Scotland Second Edition standards and the adoption of SUDS features by Scottish Water as we are of the view that this leads to best standards and maintenance.
- 3.6 SUDS must be used on all sites, including those with elevated levels of contaminants. SUDS which use infiltration will not be suitable where infiltration is through land containing contaminants which are likely to be mobilised into surface water or groundwater. This can be overcome by restricting infiltration to areas which are not affected by contamination, or constructing SUDS with an impermeable base layer to separate the surface water drainage system from the contaminated area. SUDS which do not use infiltration are still effective at treating and attenuating surface water. Please refer to the advice note on [SUDS and brownfield sites](#) for further information.
- 3.7 SEPA has no major concerns with proposals to scope out water quality modelling for routine run off as any road discharges will be taken to transitional waters. Such discharges will only require one level of at source treatment.
- 3.8 As there are no additional point source discharges with no anticipated impact on existing water quality, it is our opinion that water quality surveys are not required
- 3.9 SEPA's document WAT - SG -11 is not applicable, as there are no sewage, trade effluent or other point source discharges proposed to transitional waters as part of the development.

#### **4 Pollution Prevention and Environmental Management**

- 4.1 One of our key interests in relation to major developments is pollution prevention measures during the periods of construction, operation, maintenance, demolition and restoration. The construction phase includes construction of access roads, borrow pits and any other site infrastructure.
- 4.2 We advise that the applicant should, through the EIA process or planning submission, systematically identify all aspects of site work that might impact upon the environment, potential pollution risks associated with the proposals and identify the principles of preventative measures and mitigation. This will establish a robust environmental management process for the development. A draft Schedule of Mitigation should be produced as part of this process. This should cover all the environmental sensitivities, pollution prevention and mitigation measures identified to avoid or minimise environmental effects. Please refer to the [Pollution prevention guidelines](#).

- 4.3 A Construction Environmental Management Document is a key management tool to implement the Schedule of Mitigation. We recommend that the principles of this document are set out in the ES outlining how the draft Schedule of Mitigation will be implemented. This document should form the basis of more detailed site specific Construction Environmental Management Plans which, along with detailed method statements, may be required by planning condition or, in certain cases, through environmental regulation. This approach provides a useful link between the principles of development which need to be outlined at the early stages of the project and the method statements which are usually produced following award of contract (just before development commences).

## **5 Engineering Activities in the Water Environment**

- 5.1 In order to meet the objectives of the [Water Framework Directive](#) of preventing any deterioration and improving the water environment, developments should be designed to avoid engineering activities in the water environment wherever possible. The water environment includes burns, rivers, lochs, wetlands, groundwater and reservoirs. We require it to be demonstrated that every effort has been made to leave the water environment in its natural state. Engineering activities such as culverts, bridges, watercourse diversions, bank modifications or dams should be avoided unless there is no practicable alternative. Paragraph 255 of SPP deters unnecessary culverting. Where a watercourse crossing cannot be avoided, bridging solutions or bottomless or arched culverts which do not affect the bed and banks of the watercourse should be used. Further guidance on the design and implementation of crossings can be found in our [Construction of River Crossings Good Practice Guide](#). Other best practice guidance is also available within the water [engineering](#) section of our website.
- 5.2 If the engineering works proposed are likely to result in increased flood risk to people or property then a flood risk assessment should be submitted in support of the planning application and we should be consulted as detailed below.
- 5.3 A site survey of existing water features and a map of the location of all proposed engineering activities in the water environment should be included in the ES or planning submission. A systematic table detailing the justification for the activity and how any adverse impact will be mitigated should also be included. The table should be accompanied by a photograph of each affected water body along with its dimensions. Justification for the location of any proposed activity is a key issue for us to assess at the planning stage.
- 5.4 Where developments cover a large area, there will usually be opportunities to incorporate improvements in the water environment required by the Water Framework Directive within and/or immediately adjacent to the site either as part of mitigation measures for proposed works or as compensation for environmental impact. We encourage applicants to seek such opportunities to avoid or offset environmental impacts. Improvements which might be considered could include the removal of redundant weirs, the creation of buffer strips and provision of fencing along watercourses. Fencing off watercourses and creating buffer strips both helps reduce the risk of diffuse water pollution and affords protection to the riparian habitat.

## **6 National Vegetation Classification (NVC) Assessment.**

- 6.1 It is noted that it has been proposed to scope out an NVC assessment, but SEPA believes that this data should be provided in relation to the application proposal. Three wetland sites fall within the application boundary according to the Scottish Wetland inventory and further details to determine if these habitats are valuable or indicate groundwater flows, should be provided.

## **7 Water abstraction**

- 7.1 Where water abstraction is proposed we request that the ES, or planning submission, details if a public or private source will be used. If a private source is to be used the information below should be included. Whilst we regulate water abstractions under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended), we require the following information to determine if the abstraction is feasible in this location;

- Source e.g. ground water or surface water;
- Location e.g. grid ref and description of site;
- Volume e.g. quantity of water to be extracted;
- Timing of abstraction e.g. will there be a continuous abstraction;
- Nature of abstraction e.g. sump or impoundment;
- Proposed operating regime e.g. details of abstraction limits and hands off flow;
- Survey of existing water environment including any existing water features;
- Impacts of the proposed abstraction upon the surrounding water environment.

7.2 If other development projects are present or proposed within the same water catchment then we advise that the applicant considers whether the cumulative impact upon the water environment needs to be assessed. The ES or planning submission should also contain a justification for the approach taken.

## **8 Space for Waste Management Provision within Site Layout**

8.1 In accordance with Scottish Planning Policy (Paragraph 190), space for collection, segregation, storage and possibly treatment of waste (e.g. individual and/or communal bin stores, composting facilities, and waste treatment facilities) should be allocated within the planning application site layout. Please consult with your local council's waste management team to determine what space requirements are required within the application site layout. Some local authorities have an information sheet setting out space requirements.

## **9 Borrow pits**

9.1 Scottish Planning Policy (SPP) states (Paragraph 243) that "Borrow pits should only be permitted if there are significant environmental or economic benefits compared to obtaining material from local quarries, they are time-limited; tied to a particular project and appropriate reclamation measures are in place." The ES or planning submission should provide sufficient information to address this policy statement.

9.2 Additionally, a map of all proposed borrow pits must be submitted along with a site specific plan of each borrow pit detailing the:

- a) Location, size, depths and dimensions of each borrow pit;
- b) Existing water table and volumes of all dewatering;
- c) Proposed drainage and settlement traps, turf and overburden removal and storage areas;
- d) Restoration profile, nature and volume of infill materials, and, if wetland features form part of the restoration, management proposals.

9.3 The impact of such facilities (including dust, blasting and impact on water) must be assessed in accordance with [Planning Advice Note PAN 50 Controlling the Environmental Effects of Surface Mineral Workings](#) (Paragraph 53). In relation to groundwater, information (Paragraph 52 of PAN 50) only needs to be provided where there is an existing abstraction or GWDTE within 250 m of the borrow pit.

## **10 Air quality**

10.1 The local authority is the responsible authority for local air quality management under the Environment Act 1995, and therefore we recommend that Environmental Health within the local authority be consulted.



- 10.2 Environmental Health should advise on the need for this development proposal to be assessed alongside other developments that could contribute to an increase in road traffic. They can also advise on potential impacts such as exacerbation of local air pollution, noise and nuisance issues and cumulative impacts of all development in the local area. Further guidance regarding these issues is provided in Scottish Planning Specific Advice (2004) available on the Scottish Government's Planning website entitled [Air Quality and Land Use Planning](#).

## 11 Regulatory advice for the applicant

- 11.1 There should be consideration if any of the installations or processes proposed within this development are likely to require authorisation under the Pollution Prevention and Control Regulations 2000 or other environmental regulations. Details of regulatory requirements and good practice advice for the applicant can be found on the [Regulations section](#) of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the operations team in your local SEPA office at:

SEPA ASB,  
Angus Smith Building,  
6 Parklands Avenue  
Eurocentral,  
Holytown,  
North Lanarkshire  
ML1 4WQ

Tel: 01698 839000

If you have any queries relating to this letter, please contact me by telephone on 01698 839337 or e-mail at [planning.sw@sepa.org.uk](mailto:planning.sw@sepa.org.uk)

Yours faithfully

Julie Gerc  
Senior Planning Officer  
Planning Service

### *Disclaimer*

*This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at the planning stage. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. If you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found in [How and when to consult SEPA](#), and on flood risk specifically in the [SEPA-Planning Authority Protocol](#).*

FAO Kevin Waters  
Renfrewshire Council  
By Email

27<sup>th</sup> October 2016

Dear Ian

**Re: City Deal Renfrewshire - CWRR Scoping Report**  
**Our reference: GLA3329**

I refer to your request for scoping opinion received in this office on 22<sup>nd</sup> September 2016.

The scoping report submitted has been examined from an aerodrome safeguarding perspective and we would make the following observations:

- The site is located within the safeguarding area for Glasgow Airport. Given the size of the site it is beneath a number of our protected surfaces where structures above ground level may be subject to height restrictions. These restrictions will vary across the site. Structures, including the proposed bridge, will also require detailed technical safeguarding assessment. Early consultation with Glasgow Airport is recommended.
- The site is also within the 13km bird circle in close proximity to the airport and beneath approach and take off surfaces. Bird attractants should be considered and minimised in design of planting schedules and SUDS. It is recommended that berry bearing species be restricted to 5% of planting. Trees may also be subject to height restrictions in some areas.

Our position with regard to this proposal will only be confirmed once the design details are finalized and we have been consulted on a full planning application. At that time we will carry out full safeguarding assessments and will consider our position in light of, inter alia, operational impact and cumulative effects.

Yours sincerely



Kirsteen MacDonald

Safeguarding Manager  
Glasgow Airport



[Kirsteen\\_MacDonald@glasgowairport.com](mailto:Kirsteen_MacDonald@glasgowairport.com)



## Scottish Natural Heritage

All of nature for all of Scotland

By e-mail only to [citydeal@renfrewshire.gov.uk](mailto:citydeal@renfrewshire.gov.uk)

Mr Kevin Waters  
City Deal  
Development and Housing Services  
Fourth Floor (South Wing)  
Renfrewshire House  
Cotton Street  
Paisley  
PA1 1JD

Date: 27 October 2016  
Our ref: CNS/EIA/REN – CEA143024  
Your ref: CWRR

Dear Mr Waters,

**PROPOSAL: CLYDE WATERFRONT AND RENFREWSHIRE RIVERSIDE PROJECT –  
REQUEST FOR SCOPING OPINION IN ACCORDANCE WITH THE ENVIRONMENTAL  
IMPACT ASSESSMENT (SCOTLAND) REGULATIONS 2011  
LOCATION: CLYDE WATERFRONT AND RENFREWSHIRE RIVERSIDE**

Many thanks for your consultation to Scottish Natural Heritage (SNH) dated 22<sup>nd</sup> September 2016 requesting a scoping opinion for the above development.

### **Description of the Proposal**

The Clyde Waterfront and Renfrewshire River Project is part of the wider Glasgow and Clyde Valley City Deal which includes 20 projects across eight council areas. The Clyde Waterfront and Renfrewshire River Project is one of three City Deal Projects within Renfrewshire council area. This project will comprise of a new opening vehicular/pedestrian bridge across the River Clyde, associated road connections and a new combined cycleway and footway. The proposed development would be situated within three local authority areas adjacent to the River Clyde including Glasgow City and West Dunbartonshire council north of the River Clyde and Renfrewshire council south of the River Clyde, close to Renfrew town approximately 9km west of Glasgow City centre.

### **SNH's comments on Issue to Include in Environmental Impact Assessment**

#### **Statutory designated Sites**

There are no statutory designated sites within the development footprint of the site. However, the proposal lies within 2km of the Inner Clyde Special Protection Area (SPA), Ramsar Site and Site of Special Scientific Interest (SSSI) and the Black Cart SPA and SSSI.

Further information on these notified sites (including the site conservation objectives) can be found on the SiteLink pages of our website: <http://gateway.snh.gov.uk/sitelink/index.jsp>



### Inner Clyde SPA/SSSI and Ramsar site

The proposed development is located approximately 1.3km east of the Inner Clyde Special Protection Area (SPA) which supports a wintering non-breeding population of European importance Annex 1 bird species; Redshank.

The Inner Clyde Ramsar Site which shares the same boundary as the SPA is also designated internationally for non-breeding Redshank and the interests of this designation will be addressed as part of the consideration for the above European site.

The Inner Clyde Site of Special Scientific Interest (SSSI) is of national importance and also shares the same boundary as the SPA. Its designated features include saltmarsh habitat and a range of non-breeding birds including; Cormorant, Eider, Goldeneye, Oystercatcher, Red-breasted merganser, Red-throated diver and Redshank.

The site's status means that the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended the "Habitats Regulations" apply. Consequently, Renfrewshire Council will be required to consider the effect of the proposal on the SPA before it can be consented (commonly known as the Habitats Regulations Appraisal). The SNH website has a summary of the legislative requirements (<http://www.snh.gov.uk/docs/A423286.pdf>)

Given the separation distance between the development site and the SPA (around 1.3km) and the nature of the existing habitats within/adjacent to the development site, we are content that it is unlikely that the proposal will have a significant effect on the qualifying interest of the SPA either directly or indirectly. As a consequence, an appropriate assessment is not required for the Inner Clyde SPA.

### Black Cart SPA/SSSI

The proposed development footprint is located around 0.7km the Black Cart SPA which supports a non-breeding population of European Importance Annex 1 bird species; Whooper swan.

The Black Cart SSSI which is of national importance, shares the same boundary as the SPA and is also designated for non-breeding Whooper swan.

The site's status means that the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended the "Habitats Regulations" apply. Consequently, Renfrewshire Council will be required to consider the effect of the proposal on the SPA before it can be consented (commonly known as the Habitats Regulations Appraisal). The SNH website has a summary of the legislative requirements (<http://www.snh.gov.uk/docs/A423286.pdf>)

In our view, we do not consider that this proposal is likely to affect the availability of feeding resource or roosting habitat for the whooper swans given the wooded/urban nature of the development site and this is reflected in the historical survey data for the swans. In addition, as the proposed development would be situated within an urban area around 0.7km from the SPA/SSSI, we are also satisfied there would be no significant disturbance to whooper swans as a result of construction and operation of this proposal. As a consequence, we are content that it is unlikely that the proposal will have a significant effect on the qualifying interest of the SPA either directly or indirectly. An appropriate assessment is therefore not required for the Black Cart SPA.

## Endrick Water Special Area of Conservation (SAC) and SSSI

The Endrick Water Special Area of Conservation (SAC) is listed in table 7.3 Statutory Designated Sites of the scoping report and is of European importance for supporting populations of Annex 2 fish species; Brook lamprey, River lamprey and Atlantic Salmon.

The Endrick Water SSSI is of national importance and shares the same boundary as the SAC. Its designated features include Scottish dock, fish species Brook & River lamprey as well as earth science interests Fluvial Geomorphology of Scotland and Quaternary of Scotland.

The site's status means that the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended the "Habitats Regulations" apply. Consequently, Renfrewshire Council will be required to consider the effect of the proposal on the SAC before it can be consented (commonly known as the Habitats Regulations Appraisal). The SNH website has a summary of the legislative requirements (<http://www.snh.gov.uk/docs/A423286.pdf>)

The above designated sites are situated over 10km to the north of the proposed development. In our view, we do not consider that the integrity or notified features of these sites will be affected by the proposal. Therefore we are satisfied that these sites do not require further consideration and can be "scoped" out of the EIA.

### **Statutory Protected Species**

A number of protected species may be present and impacted by the development proposals and we therefore support the proposals to carry out badger, otter, water vole and bat surveys. Details of these species and associated legislation can be found on our website at <http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/protected-animals/>.

We have discussed proposed survey methodologies with the applicant at a meeting held on the 11 May 2016 and via follow up e-mail correspondence, however full details of survey methodologies, areas surveyed and details of any limitations to survey efforts should be included within the Environmental Statement (ES).

The ES should also report the survey results, evaluate impacts predicted to arise as a result of the development proposals, assess the significance of these impacts and recommend mitigation and/or compensation measures as is necessary and appropriate.

Species surveys should have been completed no more than 18 months prior to submission of the application, to ensure that the survey results are a contemporary reflection of species activity at and around the site.

Where survey methods or other work deviates from published guidance, deviations should have been agreed in writing with SNH in advance of carrying out survey work. A full description of the methodology used should be provided in the ES (technical appendices should be used for this where appropriate), along with an explanation of why any deviations are considered appropriate.

### Otters

As detailed in Appendix 7:1 of the scoping report all watercourses and water features within 250m upstream and downstream of the proposed development/infrastructure locations were surveyed for otter in June 2016 following methods as detailed in "Ecology of European

Otter: Conserving Natura 2000 Rivers Ecology Series No. 10 (Chanin, 2003"). As confirmed in our e-mail dated 26 May 2016, we support this survey methodology and we also support the proposals to repeat this survey in autumn 2016 to account for seasonal variation in use of the River Clyde, White and Black Cart Waters.

We refer the applicant to our recently published species guidance note for otters that brings together all the latest information and advice, including legal protection, survey methods, mitigation measures and licensing requirements - <http://www.snh.gov.uk/docs/A1959316.pdf>.

### Water vole

We recommended that any suitable water vole habitat should be surveyed for water vole activity in conjunction with the otter survey work in our 26 May 2016 email. Appendix 7:1 of the scoping report states that all suitable watercourses and water features within the proposed project and 100-200m zone of influence (up and downstream of identified watercourses) will have been surveyed in accordance with Strachan & Moorhouse (2006) and Dean et al. (2016). We support the completion of this survey work and refer the applicant to our recently published species guidance note for water voles - <http://www.snh.gov.uk/docs/A1959339.pdf>

### Badger

We support the proposal to undertake survey work for badgers as detailed in the scoping report.

### Bats

We have reviewed the bat survey methods as detailed in the scoping report including Technical Appendix 7.1 and following previous discussions with the applicant we are satisfied with the bat survey methods which follow Collins, J. (ed.) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (3<sup>rd</sup> edn). The Bat Conservation Trust, London - <http://www.bats.org.uk/pages/batsurveyguide.html>

With regard to tree roost surveys, where trees cannot be climbed and not all features can be seen from the ground, we support the proposed methods to carry out soft-felling of these trees under direct supervision of a licensed bat worker, however consideration should also be given to the use of a MEWP to survey unsafe trees at the pre-construction stage.

### Great crested newts

SNH confirmed in an e-mail dated 20<sup>th</sup> June 2016 that we are content for further great crested newt surveys to be scoped out the assessment given the absence of confirmed great crested newt records in the area, the low suitability of waterbodies within the study area for great crested newts and the isolated nature of these waterbodies.

### **Habitats**

We note from the Scoping report and discussions with the applicant that a phase 1 habitat survey has been carried out and it is considered that NVC surveys are not required.

However, we reiterate our pre-application advice that NVC surveys should be undertaken if any habitats listed on Annex 1 of the EC Habitats Directive and UKBAP Priority Habitats are identified during the phase 1 habitat surveys. It is unclear from the scoping report whether any such habitats have been identified. This should be clarified in the ES and an appropriate level of survey work undertaken.

The presentation of survey results is important and should be presented clearly and transparently in the ES. It would also be helpful if the maps that present vegetation recorded on-site are marked with the finalised layout of the proposal. This information should be used to inform any necessary mitigation.

As tree felling/woodland clearance will be required as part of the proposed development, we recommend that the developer/their consultants contact Forestry Commission Scotland at as early a stage as possible to discuss the Control of Woodland Removal Policy and the implications it may have on the development.

### Invasive non-native species

The ES should provide details of the measures that will be taken to prevent the spread of any invasive non-native species that have been identified on site as part of the Phase 1 habitat survey.

### **Landscape character and visual amenity**

We support the proposal to undertake a Landscape and Visual Impact Assessment (LVIA) in accordance with the *Guidelines for Landscape and Visual Impact Assessment (GLVIA)*, 3<sup>rd</sup> Edition (Landscape Institute, 2013).

Given the location of the development on the boundary of three local authority areas, we recommend that the list of viewpoints for the LVIA is agreed with each of the local authorities.

We recommend that the LVIA should include consideration of impacts on the landscape setting of the site and the surrounding area and how this may affect the enjoyment of existing outdoor recreational users. Consideration must also be given to the existing and potential use of the area for recreation by the general public, with reference to Scottish access rights under the Land Reform (Scotland) Act 2003 and rights of way.

The proposal should be successfully integrated into the surrounding area and it is imperative that the ES establishes a sufficient landscape and visual context to facilitate an understanding of the wider landscape and visual setting and how the development may influence and 'fit' into the landscape and visual character of the area.

The development would be located within urban, alluvial plain and green corridor landscape character types as informed by the Glasgow and Clyde Valley Landscape Character Assessment and the proposal should take cognisance of the advice and guidelines therein.

High-quality design of the development, and in particular the incorporation of well-planned green infrastructure, will be a key component of this development. There is potential for the development to form part of a wider City Deal green infrastructure network in conjunction with adjacent proposals. We recommend that such opportunities are maximised.

### **Water management and pollution prevention**

Due to the riverside location of the proposed development, if not already done so, we advise that the applicant should liaise with SEPA regarding water management and pollution prevention measures to ensure there will be no negative impacts on the River Clyde.

## **Collecting and presenting information – general advice**


We recommend that the ecological chapters are split into topics, e.g. protected areas, species (birds, bats, otter, etc.), habitats (terrestrial, freshwater), etc. Information and assessment of which activities associated with the construction and operation of the development are likely to have direct and indirect (including cumulative) significant environmental effects on the relevant natural heritage receptors, along with clear details of any mitigation, should be presented.

A schedule of environmental mitigation should be provided in an annex for developments with impacts on multiple natural heritage interests. The schedule should compile all the environmental mitigation/enhancement measures into one list/table, for ease of reference.

The information provided in this response is given without prejudice to any views that we may wish to express at a later date and is based upon our understanding of the project at this time.

I hope these comments are useful to you at this stage. If you require any further information please don't hesitate to contact me.

Kind Regards



Natalie Ward  
Operations Officer  
Strathclyde & Ayrshire





HISTORIC  
ENVIRONMENT  
SCOTLAND

ÀRAINNEACHD  
EACHDRAIDHEIL  
ALBA

Sent by email: [citydeal@renfrewshire.gov.uk](mailto:citydeal@renfrewshire.gov.uk)

Development and Housing Services  
Renfrewshire Council  
Fourth Floor (south Wing)  
Renfrewshire House  
Cotton Street  
PAISLEY  
PA1 1JD

Longmore House  
Salisbury Place  
Edinburgh  
EH9 1SH

Enquiry Line: 0131-668-8716  
[HMConsultations@hes.scot](mailto:HMConsultations@hes.scot)

Our ref: AMN/16/SU  
Our Case ID: 201603758  
27 October 2016

Dear Sirs,

**Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2011**  
**City Deal Renfrewshire – Clyde Waterfront and Renfrew Riverside (CWRR)**  
**EIA Scoping Report**

Thank you for your consultation which we received on 22 September about the scoping report for the Clyde Waterfront and Renfrew Riverside (CWRR) City Deal project. We have reviewed the details in terms of our historic environment interests. This covers world heritage sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, Inventory battlefields, and historic marine protected areas (HMPAs)

The relevant local authorities' archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings.

**Proposed Development**

I understand that the proposed development comprises the development of a new bridge crossing over the River Clyde, access roads to and from the new bridge, and a road between Ferry Road and Inchinnan Road. The project also proposes the creation of a new cycleway linking with the infrastructure proposed as part of the Glasgow Airport Investment Area (GAIA) City Deal project.

**Scope of assessment**

We note that the new cycleway linking to the Glasgow Airport Investment Area (GAIA) City Deal project extends towards the Category A listed bridges over White Cart Water (LB40425/LB40424). We can confirm, however, that the development proposed as part of the Clyde Waterfront and Renfrew Riverside (CWRR) project is unlikely to give rise to significant impacts on our historic environment interests.

Understanding that potential impacts generated by the proposed cycleway on the Category A listed bridges will be assessed as part of the EIA undertaken for the Glasgow Airport Investment Area (GAIA) City Deal project, we are content for our historic environment interests to be scoped out of full assessment as indicated in the EIA Scoping Report. We would be happy to comment on any desk-based assessment produced in support of the proposals.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is and they can be contacted by phone on 0131 668 8575 or by email on [Alison.Baisden@hes.scot](mailto:Alison.Baisden@hes.scot).

Yours faithfully,

**Historic Environment Scotland**

**Your Ref:**  
**Contact:** David X Bryce  
**Telephone:** 0141 618 7892  
**Email:** dc@renfrewshire.gov.uk  
**Date:** 28/10/2016



Renfrewshire Council  
City Deal Team  
Cotton Street  
Paisley  
PA1 1JD

**Proposal:** Request for a scoping opinion  
**Location:** Clyde Waterfront and Renfrew Riverside  
**Application No.** 16/0680/SC

Dear Sir/Madam,

Your request for a scoping opinion in respect of the above proposal has been assessed and has been determined as follows:-

The Council is of the opinion that the scope of the Environmental Statement, to accompany an application for planning permission for the implementation of a number of inter-linked infrastructure projects as detailed above, should concentrate on primarily assessing the potential impacts arising from matters described in the main body of the Sweco report titled 'Clyde Waterfront and Renfrew Riverside Scoping Report 2016' Issue P01.1 dated 7 September, 2016. An assessment of those matters set out in Table 14.1 should be scoped out of the Environmental Technical Assessments.

We would like to hear from you, let us know how satisfied you are with the service received from our Development Standards Section (Building Standards & Development Management) by completing our customer survey at <https://www.surveymonkey.com/s/DevelopmentStandards>

Yours faithfully,

  
David X Bryce  
Development Standards Manager

---

**From:** Kevin Waters <kevin.waters@renfrewshire.gcsx.gov.uk> on behalf of City Deal (Renfrewshire) <citydeal@renfrewshire.gov.uk>  
**Sent:** 28 October 2016 10:38  
**Subject:** Fw: City Deal Renfrewshire - CWRR Scoping Report  
**Attachments:** image001.jpg

Please find attached response from West of Scotland Archaeology Service to the CWRR City Deal Project - EIA Scoping document.

Regards,

Kevin Waters

City Deal Team (Renfrewshire)  
Development and Housing Services

[www.renfrewshire.gov.uk/citydeal](http://www.renfrewshire.gov.uk/citydeal)

[citydeal@renfrewshire.gov.uk](mailto:citydeal@renfrewshire.gov.uk)

City Deal, Development and Housing Services, Fourth Floor (South Wing), Renfrewshire House, Cotton Street, Paisley, PA1 1JD

----- Forwarded by City Deal on 28/10/2016 10:34 -----

"O'Hare, Martin (DRS)" <Martin.O'Hare@glasgow.gov.uk>

27/10/2016 12:08

To"citydeal@renfrewshire.gov.uk"  
<citydeal@renfrewshire.gov.uk>

cc

SubjectRE: City Deal Renfrewshire - CWRR Scoping Report

Dear Sir or Madam,

I have considered chapter 8 of the scoping document prepared in relation to the above City Deal project, which considers the potential impact of the proposals on archaeology and cultural heritage, and would like to make the following comments. In general terms, I would agree that the proposals of to identify and assess these effects through a combination of desk-based research and walkover survey is likely to be appropriate. Similarly, proposals to mitigate any impacts either through avoidance or archaeological investigation also appear to be suitable. I would, however, make a number of specific minor points, as follows:

- Table 8.1 says that no data has been provided by WoSAS during the course of the consultation exercise. This is incorrect, as we provided extracts from the Historic Environment Record database to Headland Archaeology Ltd, working as a subcontractor to SWECO, in January and July of this year.
- Figures 8.1 and 8.2 appear to focus predominantly on designated assets, which are shown individually, while undesignated features have been amalgamated into a number of areas of archaeological sensitivity. I can appreciate why this approach has been adopted, as it makes the maps more easily legible, but it does mean that a number of undesignated archaeological features are not represented.
- Section 8.3.2.2 says that the area of archaeological sensitivity defined in relation to Renfrew town centre and represented on figure 8.2 was defined by WoSAS to correspond to the extent of the town as shown on the 1<sup>st</sup> edition OS map of 1857. This is not technically correct, though I would agree that there is a high degree of concurrence. However, the polygon was actually an attempt to define the area of the town with some potential to produce buried material relating to early occupation in the burgh, and it is also the case that the settlement shown on

the 1<sup>st</sup> edition was already (marginally) larger than this.

- I would also say that this section possibly underplays the potential significance of industrial sites, in particular those along the banks of the river. These are not identified in the scoping document, particularly given the industrial and shipbuilding heritage of the Clyde.
- Section 8.4 .1 states that none of the archaeologically sensitive areas or historic buildings identified in the high-level baseline study would be affected by construction impacts, and I would agree that this appears to be the case, at least in terms of the features identified in the scoping document. However, I would also agree with the statement that currently unknown archaeological material may be affected by this work; however, I would accept that it is likely that these impacts could be mitigated by archaeological investigation (most likely monitoring or excavation) and recording.
- As noted above, I would agree that the range of sources to be consulted in the desk-based assessment phase of the study appears likely to be sufficient to give a reasonable understanding of baseline conditions. I would also agree that this should be supplemented by a walkover survey, though I would stress that the nature of the ground in the study area means that this may not be sufficient to demonstrate that the proposal would have no impact on the historic environment; it is possible, for example, that significant archaeological material may survive only in the form of buried sub-surface deposits that would not be identifiable from surface inspection alone.

Regards,

Martin O'Hare



Martin O'Hare  
Historic Environment Records Officer  
West of Scotland Archaeology Service  
231 George Street, Glasgow, G1 1RX  
Tel: 0141 287 8333 email: [Martin.O'Hare@wosas.glasgow.gov.uk](mailto:Martin.O'Hare@wosas.glasgow.gov.uk)

**Peter Hessett**  
**Strategic Lead, Regulatory**



**Development Management**, Aurora House, 3 Aurora Avenue,  
Clydebank, G81 1BF  
Tel: (0141) 951 7930 [development.management@west-dunbarton.gov.uk](mailto:development.management@west-dunbarton.gov.uk)

Our Ref: PREAPP16/104  
Your Ref:  
Date: 19 December, 2016

If calling or telephoning please ask for:- Karen McChesney, ext.7943

For the attention of Rebecca McLean

Sweco  
Spectrum House  
2 Powderhall Road  
Edinburgh  
EH7 4GB

Dear Madam,

**Scoping Opinion – CWRR City Deal Project**  
**The Town and Country Planning (Environmental Impact Assessment)**  
**(Scotland) Regulations 2011**

I refer to the proposal at the above site and your request to provide a scoping opinion.

This letter constitutes West Dunbartonshire Council's Scoping Opinion and seeks to identify those matters that should be considered in an Environmental Statement (ES) accompanying a planning application for the proposed development at the Renfrew Bridge site. The Scoping Opinion also includes a copy of the scoping matrix (attached).

In addition to the statutory and non-statutory consultees consulted on the proposal as part of the joint arrangement with Glasgow City Council and Renfrewshire Council, I have also consulted the following:

- Access Officer, Greenspace, West Dunbartonshire Council
- Environmental Health, West Dunbartonshire Council
- Road Services, West Dunbartonshire Council

Where recommendations or advice has been given generally for the whole site (i.e. across the three Council areas) I would expect these matters to be taken into account in the forthcoming ES. With particular reference to any potential effects of the project within the West Dunbartonshire Council area, I require the following to be addressed:

**Chapter 2 The City Deal Proposals and Context**

Chapter 2 includes a short section on the relevant planning policies at strategic and local levels. The adopted plan for West Dunbartonshire Council is the *West Dunbartonshire Local Plan 2010*. The policies set out in table 2.2 relate to the *West Dunbartonshire Local Development Plan (Proposed Plan 2015)*. The policies contained in the adopted local plan should therefore be included in the ES as this is the development plan for the determination of any future applications, whilst the

Proposed Plan is a material consideration in the determination of planning applications.

#### **Chapter 4 Geology, Hydrogeology, Soils and Contaminated land**

Environmental Health advise that north of the River Clyde was also subject to extensive bombing during World War II and that the potential unexploded ordinance (UXO) risk assessment should be extended across the river. Any additional precautions proposed for the Renfrew and Abbotsinch Airfields should be considered for north of the river also. The ES should be updated to take account of this. Environmental Health hold reports for some historic site investigations within the Rothesay Dock area that may be of interest. These are available for review within our office at Aurora House, Clydebank.

#### **Chapter 6 Landscape, Townscape and Visual Impact**

I note from Scottish Natural Heritage's response (dated 27 October, 2016) that they support the proposal to undertake a Landscape and Visual Impact Assessment (LVIA) and I agree that the list of viewpoints should be agreed with officers from this Council.

#### **Chapter 7 Ecology and Nature Conservation**

Scottish Natural Heritage consider that the proposal is unlikely to have a significant effect on the qualifying interest of the SPA either directly or indirectly (letter from SNH dated 27 October, 2016, page 2, para 4). Please be advised that West Dunbartonshire Council will also require to carry out a Habitats Regulations Appraisal, in addition to Renfrewshire Council, as part of any planning application.

#### **Chapter 8 Archaeology and Cultural Heritage**

The sites of known potential archaeological interest are located on the south bank of the river. However, I note from West of Scotland Archaeology Service response dated 27 October, 2016 that this chapter underplays the potential significance of industrial sites, in particular those along the banks of the river. These are not identified in the scoping document despite the industrial and shipbuilding heritage of the Clyde. Given that unknown archaeological material may be affected by construction work, any impacts due to construction works on the south bank of the river should also be mitigated by archaeological investigation (most likely monitoring or excavation) and recording. The ES should be updated to reflect these comments.

#### **Chapter 9 Traffic and Transport**

The Council's Road Services advise that whilst it is recognised that option C is the preferred option for the bridge, the following issues will require further assessment and analysis:

- More information is required re: the forecast increase in traffic across all our road network and the impact that would arise if it were proposed to introduce quality bus corridors on the road network;
- Details of existing conflict which will arise from parked or service vehicles on the road network needs to be developed;
- More information is needed regarding the effect on journey times / reliability of buses travelling along the Dumbarton Road Corridor and the corridors from Kilbowie Road to Glasgow Road with the bridge in place;
- Analysis is required regarding the expected spike in congestion and its effect on journey times just prior to bridge closing caused by motorists who have decided that this is the preferred route to cross the Clyde. This is a major concern to this Council;

- It is noted that induced traffic caused by the Bridge has not been accounted for to date and that this may be a significant factor with traffic travelling to Braehead, especially at weekends; and
- It is noted that Saturday modelling is limited to date. Experience informs us that this will be a major concern and this needs to be developed and addressed.

The ES should include these matters. This Council's Road Services also request sight of the scenario testing report and audit report that is currently being produced by Sweco at the earliest possible opportunity.

### **Chapter 10 Noise and vibration**

Environmental Health advise that para 10.4.1 seems dismissive of noise affecting existing noise sensitive receptors as being only "short-term". They consider that the development has the potential to cause disruption for a considerable period of time during the construction phase, particularly piling operations over water. I therefore request that the ES ensures these potential noise impacts are more carefully taken into account.

### **Issues to be Scoped Out**

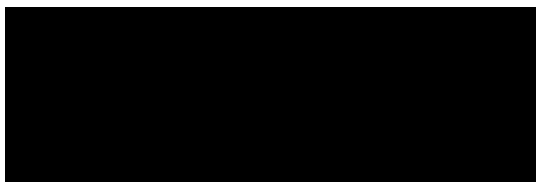
I note in Table 14.1 the issues proposed to be scoped out. Under the headings Ecology and Nature Conservation, Archaeology and Cultural Heritage, and Noise and Vibration the table should be updated to reflect the comments above.

The attached scoping matrix identifies the need for the Human Environment receptor to be considered. Nuisance and archaeological heritage issues are already covered in chapters 8 and 10. There should also be a chapter in the ES which addresses the socio-economic, health and safety, and amenity impacts of the proposal. This should be in addition to any economic benefit analysis reports to be submitted as part of the planning application.

I look forward to the above matters being addressed in the ES.

Please contact Karen McChesney on 0141 951 7943 should you wish to discuss any of these matters further.

Yours faithfully,



Pamela Clifford  
Planning and Building Services Manager



Potential receptors of impact		Activities and Potential Impacts		
		Construction Phase	Operation phase/ongoing site maintenance	Post-operation/decommissioning phase
Water	Surface water hydrology and channel morphology	✓	✓	n/a
	Surface water quality	✓	✓	n/a
	Groundwater hydrology	✓	✓	n/a
	Groundwater quality	✓	✓	n/a
	Marine Interests (sea, sedimentation, marine ecology)	✗	✗	n/a
Land	Landscape	✓	✓	n/a
	Soils	✓	✓	n/a
	Geology	✓	✓	n/a
Air	Local air quality	✓	✓	n/a
	Regional/Global air quality	✗	✗	n/a
Flora and Fauna	Aquatic ecology	✓	✓	n/a
	Terrestrial ecology	✓	✓	n/a
Human Environment	Socio-economic	✓	✓	n/a
	Health and Safety	✓	✓	n/a
	Amenity	✓	✓	n/a
	Nuisance	✓	✓	n/a
	Architectural and archaeological heritage	✓	✓	n/a

SCOPING MATRIX – WEST DUNBARTONSHIRE COUNCIL