

Ref: AMacN / JJ / 87097
Date: 31st May 2011

Inverclyde Council
Regeneration and Planning
Cathcart House
6 Cathcart Square
Greenock
PA15 1LS

Dear Sirs,

87097 – Gourock Pierhead Regeneration

Proposed alterations and environmental improvements to existing car parks and construction of new public realm areas, open space, public realm link with associated car parking and associated engineering works at Gourock.

The Environmental Impact Assessment (Scotland) Regulations 1999

Introduction

W.A. Fairhurst & Partners (Fairhurst) have been appointed by Riverside Inverclyde (Ri) to request a Screening Opinion from Inverclyde Council (the Council) under the Environmental Impact Assessment (Scotland) Regulations 1999 (the Regulations) for the above development (the Proposals).

In accordance with Regulation 5(1) of the Regulations and in advance of a formal detailed planning application being submitted, Fairhurst request that the Council provide a formal screening opinion. This is in order to establish whether or not a formal Environmental Impact Assessment (EIA) of the Proposals is required to accompany the forthcoming planning application.

In line with the Regulations and to enable the Council to adopt a screening opinion, please find enclosed an indicative masterplan / phasing drawing showing the nature and location of the Proposals (Drawing 1194-31-A) and a drawing which provides additional detail regarding the proposed road link / build out (Drawing 1194-05-C). Additionally, a description of the nature and purpose of the Proposals and their likely significant effects on the environment have been set out below as required by the Regulations.

The Site, Surroundings and Designations

Please refer to Drawing 1194-31-A which shows the location of the Proposals and an indicative site layout.

The mains components of the site are two areas of car parking (the first at the train station and the second between the buildings on the north side of Kempock Street and the Firth of Clyde). There is an area of rough, apparently previously developed land to the north of the station car park, between the car park itself and the Firth of Clyde.

The station car park is currently accessed via a junction with Shore Street, and the western car park is currently accessed via a junction with Albert Road, at the western end of Kempock Street.

Separating these two areas is a stretch of rough ground and intertidal foreshore / beach, situated on the Firth of Clyde below buildings at the east end of Kempock Street.

The site's surroundings are a combination of established residential areas, commercial floor space along Kempock Street and the train station.

Albert Road, Kempock Street and Shore Street provide the main arterial routeways to, from and through Gourrock.

Having accessed Scottish Natural Heritage's (SNH) website (SiteLink), Fairhurst note that there are no national designations in, adjacent or in close proximity to the site which have the potential to be affected by the Proposals.

Proposed Development

Ri intend to apply for detailed planning permission to develop Phases I, II, III and IV as shown on Drawing 1194-31-A, and the combination of these Phases constitutes the following Proposals:

- Alterations to the configuration of car parking and new public realm at the existing car park to the north of Kempock Street;
- A new public realm link and car parking between car parks (involving build out across the existing beach / intertidal area);
- Alterations to the configuration of the car parking, with new public realm and open space at the existing car park at the station; and
- Associated development, such as landscaping etc.

As part of the Proposals, the level of the ground will be raised to form a platform for the public realm link between the existing car parks. The platform will be supported by a sloped embankment with revetment protection into the existing beach / intertidal area. Full detail of this aspect of the Proposals is provided in drawing 1194-05-Rev C.

Detailed planning permission will be sought for the above development, which forms the basis for this request for the Council's screening opinion.

Possible Effects on the Environment

Fairhurst consider that the proposals fall under Schedule 2 of the Regulations by virtue of the following aspects of the Proposals: Section 1(e) "reclamation of land from the sea" and 10(b) "urban development projects where the area of the development exceeds 0.5 hectare".

In accordance with Schedule 3 of the Regulations, Fairhurst do not consider that the Proposals will raise any significant environmental effects, having regard to the following selection criteria for Schedule 2 development:

- Characteristics of the development;
- Location of the development; or
- Characteristics of the potential impact.

As such, based on the reasoning set out below under specific sub-headings, Fairhurst consider that an EIA of the Proposals is not required.

Terrestrial and marine **ecology** has been considered, and a Phase 1 Habitat and Expert Eye Survey has already been undertaken, which will be submitted along with the planning application. The survey concludes that “ecologically, the site area is relatively poor”. Although it is noted that this is largely based on the land portion of the site and not the intertidal area, Fairhurst consider that there will be minimal loss of marine habitat, and the area in question is not protected by any designations or considered to be unique or especially unusual for the area.

The site is not protected by any environmental designations and the majority of the site is covered in hardstanding. Overall, Fairhurst consider that none of the development site has any specific special value in terms of ecology and biodiversity.

More specifically, in terms of otters, the rocks on the site “do not appear to provide any good opportunities for holts or resting-up places”. Opportunities for roosting bats and nesting birds are also limited.

Overall, Fairhurst consider that the potential effects on ecology will not be significant and mitigation measures (such as avoiding construction during sensitive times of the year) will negate any negative impacts. Additionally, the need for further surveying will be agreed with the Council and consultees and undertaken at the appropriate time to inform the planning application determination process, including the discussion of mitigation measures, conditions etc.

Fairhurst consider that it is unlikely that the Proposals will have any significant negative effect on **coastal processes** such as currents. This is because the proposed public realm link is parallel to the existing coast, and does not extend into the main body of the sea in this location. The Proposals do not have a large development footprint in the marine environment, and are unlikely to significantly affect existing coastal processes and tidal movements etc.

The potential for disturbance of **contaminated materials** on land and in the marine environment is noted. Fairhurst have already undertaken a desk study report in order to identify any potential geotechnical and geo-environmental constraints which should be taken into consideration during the design process. Ground conditions in the area are expected to comprise mainly granular, post glacial marine or beach deposits, with some made ground. No contamination issues were identified. This report concluded that there are no specific Geotechnical or Geoenvironmental constraints which would preclude development of the nature that has been indicated, although consideration of certain specific issues will be required. The report recommended that an intrusive investigation and further analysis be undertaken when the overall development layout has been finalised

In light of the above, Fairhurst consider that careful investigation, combined with full consultation with the Council’s contaminated land officer, SEPA and other stakeholders, will facilitate a design solution which does not result in any significant negative impact with regards to ground conditions or contamination.

In terms of **flooding**, a CIRIA Level 2 Flood Risk Assessment (FRA) may be prepared to accompany the planning application. This would include mitigation measures such as appropriate finished levels for the public realm link. At this stage, it is not anticipated that the Proposals will be at risk of flooding (provided that recommended finished levels are complied with) or increase the risk of flooding

elsewhere. Due to the Proposals' coastal location and the minor nature of the proposed additional footprint (only the public realm link), it is not considered that compensatory flood storage is required. Water resistant materials and construction will be used where appropriate.

In terms of **landscape and visual impact**, it is noted that the site is not located within a National Scenic Area and there are no other landscape designations covering the site. Fairhurst consider that the Proposals will not detract from views of the site from local receptors (such as from the rear of commercial and residential properties along Kempock Street or from the pierhead area) as the Proposals will improve the amenity and appearance of the site.

In terms of longer views (over the Firth of Clyde and from ferries etc), it is considered that the limited vertical scale of the Proposals will not result in any significant change to the overall view. The public realm link will reflect the appearance of existing nearby sea wall / retaining structures and will not detract from the setting of the wider area.

In terms of **transport and access** issues, Fairhurst anticipate that there will be no likely significant effects on the environment as a result of the proposals. Fairhurst consider that there will be no significant impact on the surrounding road network as a result of construction traffic. This is due to the temporary nature of the (construction) works and the likelihood of being able to manage construction traffic by containing it within the site and avoiding movements at peak and sensitive periods. It should also be noted that a Transport Statement will be provided in support of the planning application.

In terms of car parking provision, there will be no net loss of space once the Proposals are completed, as additional spaces will be provided on the public realm link. This will improve access to the train station, encouraging park and ride usage activity, reducing car dependence. Additionally, pedestrian access along the sea front at Gourrock will be greatly improved as a result of the Proposals, which will create a continuous walkway along the sea front.

In terms of **noise and vibration**, it is recognised that there is the possibility of a negative effect on sensitive receptors such as nearby properties and ecological receptors during the construction phase. However, this impact will be temporary in nature and can be mitigated by the use of time restrictions on construction activities to ensure that there is no significant negative impact on nearby dwellings.

With regards to **cultural heritage**, Fairhurst note that there are no listed buildings within the site itself and the site is not located within a Conservation Area. From online records, it is noted that there was archaeological investigation in 1999 of the area around the railway pier. Overall, Fairhurst consider that the site is unlikely to be of special archaeological value. From online records, Fairhurst note that there is a B Listed building overlooking the site from Kempock Street, however it is not considered that the Proposals will have any adverse effect on the setting of this building.

Fairhurst consider that the Proposals will have no significant impact on **air quality**, although the proximity of sensitive receptors such as the Firth of Clyde and nearby residential properties are noted. It is considered that adherence to best practice and mitigation measures such as damping down of stockpiled materials will mitigate the potential negative effects appropriately.

Fairhurst consider that the anticipated levels of traffic associated with the use of the road are unlikely to have a significant negative impact on the air quality of the surrounding area.

Conclusion

The environmental considerations detailed above have been carefully considered and any future planning application will be submitted along with the accompanying information identified in this letter. All other environmental aspects of the proposals will be suitably addressed through the planning application process and detailed design.

Fairhurst also consider that, in due course, information relating to construction methods can be provided to control and mitigate any potential effects on the marine environment.

Fairhurst consider that the Proposals, do not, when determined against the Regulations, require that a planning application be accompanied by an EIA.

Fairhurst would therefore be grateful if the Council would provide a screening opinion and:

- (a) make a formal determination as to whether or not an Environmental Statement is required in this instance; and
- (b) formally record this decision on the statutory planning register.

Fairhurst also request that the Council let Fairhurst know as soon as possible if any further information is required to enable a decision to be made on this matter.

Should you require any further information other than that supplied above please do not hesitate to contact me via the means detailed above.

Yours sincerely,

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Planning & Development

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Encl: Drawing 1194-31-A
Drawing 1194-05-C

cc Garry Williamson, Riverside Inverclyde
Phil Gane, Parsons Brinckerhoff
Paul Miller, Hirsts Landscape Architects