marinescotland

Scottish Government
Riaghaltas na h-Alba
gov.scot

T: +44 (0)300 244 5046
E: ms.marinelicensing@gov.scot

Ms B McLean
Sweco 2nd Floor Quay 2
139 Fountainbridge
Edinburgh
EH3 9QG

Date: 26 November 2020

Dear Ms McLean,

SCREENING OPINION UNDER THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (AS AMENDED)

Thank you for your screening opinion request dated 31 August 2020 in regards to the proposed reclamation of land, through the construction of a steel sheet piled barrier wall within the River Clyde, at Lobnitz Dock, Renfrew, Renfrewshire ("the Proposed Works").

It is the Scottish Ministers' understanding that the Proposed Works are to be undertaken as part of the wider Clyde Waterfront & Renfrew Riverside ("CWRR") project, for which two marine licences were granted in August 2019, and that the Proposed Works were not included in the proposals that were previously assessed.

The CWRR project is an Environmental Impact Assessment ("EIA") project therefore the Scottish Ministers consider the Proposed Works to fall under paragraph 13 of schedule 2 of The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended) ("the 2017 MW Regulations"), on the basis that they constitute an extension of schedule 2 works already authorised. The Scottish Ministers are therefore obliged to adopt a screening opinion in regards to the Proposed Works. The screening opinion request submitted included an assessment of the potential additional impacts associated with the Proposed Works. This assessment has been taken into account by the Scottish Ministers in adopting a screening opinion.

Under regulation 10(5) of the 2017 MW Regulations, the Scottish Ministers have consulted with NatureScot (formerly Scottish Natural Heritage), the Scottish Environment Protection Agency ("SEPA"), Renfrewshire Council and Historic Environment Scotland ("HES") as to their view on whether the Proposed Works are an EIA project. Copies of the consultation responses received are attached for your review (at Appendix I).

When making a determination as to whether schedule 2 works are an EIA project, the Scottish Ministers must take into account such of the selection criteria set out in schedule 3 of the 2017 MW Regulations as are relevant to the Proposed Works. In this regard, the Scottish Ministers have considered the following:

Characteristics of the works

The CWRR project currently has two valid marine licences, one authorising construction works associated with a new opening bridge over the River Clyde and another authorising dredging to be undertaken to enable the formation of a layby berth to the west of the proposed bridge. The Proposed Works (which are to be undertaken to the immediate east of the proposed bridge) are additional to these activities and involve the construction of an impermeable, approximately 40 metre long, steel sheet piled barrier wall across the seawards entrance to Lobnitz Dock forming a dry area to the landward side of the wall. This will then be filled with dredge material generated by the layby berth works and other additional material if required. In total, approximately 3,200 square metres, or 40,000 cubic metres, of land is to be reclaimed from the River Clyde through the infilling of the disused dock. The purpose of the Proposed Works is to stabilise the failing dock and prevent erosion of the adjacent land, on which CWRR project infrastructure is to be built. Depending on ground conditions, it is anticipated that the Proposed Works can be completed over a period of two weeks. A plan of the Proposed Works is provided in Appendix II.

The Proposed Works are not anticipated to generate any significant amounts of waste or pollution. The Proposed Works will reuse (as infill) the waste dredge material produced by the wider CWRR project thereby removing any requirement to dispose of this material at a sea deposit site or through landfill and therefore eliminating the associated material storage and transportation implications. It is intended for an appropriate construction methodology to be employed to ensure there are no pollution releases into the River Clyde during the piling activities. In addition, best practice measures are to be employed to ensure that potential nuisance from dust and noise during construction are reduced sufficiently to avoid any significant impacts.

SEPA advised that it did not consider the Proposed Works to require an EIA.

Location of the works

The Proposed Works are located within the River Clyde at the disused Lobnitz Dock, situated in the former Christies Metal Recycling facility in Renfrew, Renfrewshire. Renfrewshire Council agreed with the assessment provided by the applicant and confirmed that it did not consider the Proposed Works to require EIA.

The Proposed Works are not located within or in close proximity to any sensitive areas as defined by the 2017 MW Regulations. NatureScot did not provide any specific comments in regards to potential impacts on natural heritage interests but did advise that it did not consider the Proposed Works to require an EIA.

There is the potential for noisy activities associated with the Proposed Works, such as the sheet piling, to impact upon the smolt migration period. The applicant will schedule noisy activities to be undertaken outwith the sensitive period for the migration of salmon smolts (March to May) therefore no significant impacts are anticipated.

HES confirmed there are no assets of historic environment interest within the site or in its immediate vicinity and therefore advised it does not consider the Proposed Works to require an EIA.

Characteristics of the potential impact

The Scottish Ministers agree with the applicant's assessment that the impact of the Proposed Works will be minor and localised due to their nature.

Based on the information provided and advice received, the Scottish Ministers are content that the Proposed Works do not alter the significance of any of the environmental effects which have previously been assessed in regards to the CWRR project, and do not introduce any additional significant environmental effects, in relation to the potential impact of the Proposed Works.

Conclusion

In view of the findings above, the Scottish Ministers are of the opinion that an EIA is not required to be carried out in respect of the Proposed Works.

If you increase, alter or extend the Proposed Works, you are advised to contact Marine Scotland - Licensing Operations Team again to confirm if the screening opinion is still valid.

A copy of the screening opinion has been forwarded to Renfrewshire Council planning department. The screening opinion has also been made publicly available through the Marine Scotland Information website.

If you require any further assistance or advice on this matter, please do not hesitate to contact me.

Yours sincerely

Anni Mäkelä
Marine Scotland - Licensing Operations Team

Appendix I – Consultation Responses

Marine Laboratory, 375 Victoria Road, Aberdeen, AB11 9DB
ms.marinelicensing@gov.scot
http://www.gov.scot/Topics/marine/Licensing/marine

MacLeod N (Neil) (MARLAB)

From: Dave Lang [redacted]
Sent: 13 October 2020 15:34
To: MacLeod N (Neil) (MARLAB)
Cc: [redacted] Makela A (Anni)
Subject: RE: Renfrewshire Council (Per Sweco) - Infilling of Lobnitz Dock, Clyde Waterfront Renfrew Riverside (CWRR)- Consultation on Request for Screening Opinion

Dear Mr MacLeod,

Having reviewed the project under consideration I can advise that NatureScot is of the opinion that, for the infilling of Lobnitz Dock specifically (i.e. that aspect of the wider Clyde Waterfront Renfrew Riverside project that is subject to Marine Licensing), **an EIA will not be required**. This advice is given without prejudice to any view we may subsequently take on the requirement for the wider CWRR project to be made subject to EIA through Town & Country Planning or similar.

I hope that the above is sufficient to your requirements, however please do not hesitate to get in touch if there is anything further that you wish to discuss.

Yours,

Dave Lang
Operations Officer
Strathclyde & Ayrshire

From: [redacted]
Sent: 11 September 2020 17:59
To: consultations ; STRATHCLYDE_AYRSHIRE ; [redacted]
Subject: Renfrewshire Council (Per Sweco) - Infilling of Lobnitz Dock, Clyde Waterfront Renfrew Riverside (CWRR)- Consultation on Request for Screening Opinion

Dear Sir/Madam,

THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (AS AMENDED) ("the EIA Regulations")

CONSULTATION UNDER PART 2, REGULATION 10(5) OF THE EIA REGULATIONS

Renfrewshire Council (Per Sweco) - Infilling of Lobnitz Dock, Clyde Waterfront Renfrew Riverside (CWRR)

Renfrewshire Council have requested a screening opinion for upcoming works to infill Lobnitz dock in relation to the ongoing CWRR project under regulation 10(1) of the EIA regulations.

SEPA
Scottish Environment Protection Agency
Buidheann Dìon Àrainneachd na h-Alba

Our ref: PCS/172993
Your ref:

If telephoning ask for:
Julie Gerc

22 September 2020

Neil Macleod
Scottish Government
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

By email only to: [redacted]

Dear Sir

The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017
Infilling of Lobnitz Dock, Clyde Waterfront Renfrew Riverside (CWRR)- Consultation on Request for Screening Opinion
Lobnitz Dock, Clyde Waterfront Renfrew Riverside

Thank you for consulting SEPA on the screening opinion for the above development proposal by way of your letter which we received on 14 September 2020. We would welcome engagement with the applicant at an early stage to discuss any of the issues raised in this letter.

SEPA has no strong views on the requirement for an Environmental Impact Assessment and we would defer to the determining authority for their views on the matter. Whether or not an Environmental Impact Assessment is required, to **avoid delay and potential objection** the following key issues must be addressed and information submitted in support of the application.

1. Water Framework Directive and River Basin Management Planning

1.1 The Water Framework Directive (2000/60/EC) was implemented in Scotland through the Water Environment and Water Services (Scotland) Act 2003 (WEWS). This legislation requires SEPA to lead and co-ordinate in the Scotland and Solway Tweed river basin districts to protect and improve Scotland's water environment. Further information is available from the River Basin Management Planning section of our website. The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) (CAR) provide controls over activities affecting the water environment.

1.2 Engineering works in transitional (estuaries) and coastal waters are not regulated by SEPA under CAR. Such works below the Mean High Water Springs mark or in any tidal river up to the tidal influence will require a marine licence from Marine Scotland Licensing Operations Team, designated a Responsible Authority under The Water Environment (Relevant Enactments and Designation of Responsible Authorities and Functions) (Scotland) Order 2011 made under Section 2(8) of WEWS. By this designation Marine Scotland is required to ensure that marine licensing assists in the delivery of River Basin Management Planning objectives. Similarly, planning authorities are designated Responsible Authorities by the Water Environment and Water Services (Designation of Responsible Authorities and Functions) Order 2006. In order to meet the requirements of the Water Framework Directive Responsible Authorities must carry out their statutory functions in a manner that secures compliance with the objectives of the Water Framework Directive (i) preventing deterioration and (ii) promoting improvements in the water environment in order that all water bodies achieve "good" ecological status by 2015.

1.3 River basins comprise all surface waters, including transitional (estuaries) and coastal waters extending to 3 nautical miles seaward from the territorial baseline. Within the River Basin Management context, the supporting documentation should identify if the impacts of the proposal are likely to lead to deterioration of the marine environment or present opportunities for improving the marine environment. Marine Scotland and, where applicable, the planning authority, must take this into account in considering the application due to their designation as Responsible Authorities.

1.4 The Water Framework Directive (WFD) requires considerations of Scotland's water bodies in terms of their chemical, biological and hydromorphological parameters and combines these parameters to score each water body in terms of it's status, ranging from bad, through poor, moderate, good to high. A system of River Basin Planning has been put in place to ensure delivery of the WFD and manages the current targets set for each water body in support of Directive targets.

1.5 Water body data collated in support of the WFD is available on the Scottish Environment website and should be used in assessing any development proposal. The website provides data on the overall status of all Scotland's water bodies, with the options of filtering by local authority, catchment or water body name or alternatively just panning across the map. A summary table of the 'overall status' and an indication of whether there has been 'change' or 'no change' in status in the last year is provided for each water body in the search results, below the spotfire map. This table can be exported if required. Classification results are updated annually (following any necessary verification requiring to be completed post-publication). If you require further information for a water body which has undergone a change in status in the last year you can request verification of the change by emailing the RBMP Unit (rbmp@sepa.org.uk.) entitling your email "Urgent request for data verification". Detailed information on the pressures affecting an individual water body and the measures (actions) set against it to address the pressures are available by accessing the individual water body datasheet via the relevant hyperlink. This data should form part of the baseline characterisation in the supporting documentation.

2.6 In order to meet the objectives of the Water Framework Directive, coastal development should be designed wherever possible to avoid engineering activities in the marine environment.

2.7 We recommend that it be demonstrated in the supporting documentation that every effort has been made to leave the marine environment in its natural state. There is a need to protect the remaining areas of intertidal zone along some stretches of the developed coastline as these areas have become fragmented and degraded by the coalescence of development in the past.

2.8 As responsible authorities, planning authorities should promote measures already agreed in respect of relevant water bodies as well as considering other enhancement opportunities to contribute to River Basin Management Plan, Nature Conservation (Scotland) Act 2004 and sustainability development objectives. Examples may include restoration, coastal realignment, soft engineering or the incorporation of naturalistic features in the design of shoreline works, or planting with salt tolerant species. Guidance that may be drawn upon includes:

- Water Framework Directive Mitigation Measures Manual
- Estuary Edges: Ecological Design Guidance

2. Site layout and nature of construction for marine developments

2.1 The supporting documentation should contain site plans and cross sections showing the location, footprint, type and design of all the engineering structures, including temporary works, in the marine environment. Information for onshore elements such as access tracks, buildings, temporary works etc. should also be included. Access routes and working compounds for vehicles should be specified during construction. This information will allow us to screen the proposals and determine whether they are likely to present a risk to ecological status.

2.2 For development projects involving **dredging** works, the supporting documentation should include information on the dredge footprint area, dredging method, quantities of material to be dredged and a description of the substrate type/habitats and species within the area. Although by its nature dredging is a destructive activity, adverse effects can be minimised (e.g. timing, dredging technique). Options for the subsequent disposal and beneficial reuse of the material should also be considered.

2.3 For **coastal protection and flood defence** the supporting documentation should include a section on the appraisal process and justification for the preferred defence option. The feasibility of soft engineering and natural flood management techniques should always be considered in the appraisal process. Any coastal defence scheme should be appropriate in scale and type for the area.

2.4 The applicant should consider if the nature of the proposal or the nature of the location could result in disturbance of contaminated sediments. The supporting documentation should demonstrate that this issue has been addressed, and, if a significant issue, then measures to minimise disturbance and subsequent relocation of such contamination, and to monitor impacts, should be set out within the supporting documentation. If it is suspected that such sediments may be contaminated with radioactive substances, further advice should be sought from SEPA as disturbance and movement of radioactively contaminated sediments may require authorisation under the Radioactive Substances Act 1993.

2.5 Should the proposal involve the disposal of radioactive waste, this will need to be undertaken in accordance with an authorisation issued by SEPA under the Radioactive Substances Act 1993. The applicant will need to give further consideration to how these wastes will be managed and details of the proposed methods will need to be submitted to SEPA as part of their application for authorisation under the Radioactive Substances Act 1993. As this information relates to potential significant environmental effects, SEPA's advice is that such information should also be included within the ES.

2.6 Please note that Oil Spill Contingency Plans should be sent directly to SEPA's Emergency Planning Unit to co-ordinate a response.

3. Marine ecological interests

3.1 Advice on designated sites and European Protected Species should be sought from Scottish Natural Heritage. Marine and transitional Special Areas of Conservation (SAC) and Special Protected Areas (SPA) and Marine Protected Areas (MPA) are also Water Framework Directive Protected Areas. Therefore, their objectives are also River Basin Management Plan objectives which should be taken into account when developing the supporting documentation. In such situations, Scottish Natural Heritage may contact SEPA for input on the consultation.

3.2 The Nature Conservation (Scotland) Act 2004 gives all public bodies, including SEPA and planning authorities, a duty to further the conservation of biodiversity. The developer is recommended to consult both the UK Biodiversity Action Plan and Local Biodiversity Action Plan lists for marine and coastal features found within the proposed areas of development, and consider mitigation measures, as appropriate. During the construction, operation and maintenance phases, it is important that good working practice is adopted and that wider habitat damage is mitigated against or kept to a minimum within defined acceptable limits. These should be controlled through a Construction Environmental Management Plan (see section 6 below).

3.3 Given that the accidental introduction of Marine Non-Native Species (MNNS) has been highlighted as a risk for water body degradation, we recommend that controls should be included in development planning and marine licensing for MNNS in line with Water Framework Directive and Marine Strategy Framework Directive objectives, and EU Biodiversity Strategy targets. Under the Water Framework Directive the presence of MNNS within a water body can constitute a significant pressure on the biological elements. Good status is usually the maximum a water body can achieve if MNNS are detected and this can fall to moderate status if MNNS are present above certain thresholds. Once well established, efforts to eliminate MNNS species have proven to be extremely expensive and so far, no non-native species have been successfully eradicated from the marine environment. Therefore, in view of these difficulties, we support the GB Non-Native Species Secretariat recommendation to put into place effective biosecurity measures to prevent introduction and to stop their spread.

Accidental introduction of MNNS can also occur via attachment to construction plant, specialised equipment and moorings as these are moved from one area to another. Please detail the measures to minimise the risks of introducing of MNNS into the adjacent water bodies within the supporting documentation and draft Construction Environmental Management Plan. Guidance that may be drawn upon includes:

- The alien invasive species and the oil and gas industry guidance produced by the Oil and Gas industry;
- SNH web-based advice on Marine non-native species;
- Marine non-native guidance from the GreenBlue (recreation advice).

4. Coastal processes

4.1 Depending upon the nature, scale and location of the proposed development the potential exists for there to be changes to coastal and sediment transport processes in the adjacent water body on completion of the development. The supporting documentation should assess the significance of such alterations and discuss the implications of these with respect to shoreline and seabed morphology, and wider ecosystem health in line with RBMP objectives. Marine Scotland is the responsible authority for licensing coastal development under the Marine Scotland Act 2010, and therefore we recommend that they be consulted with respect to the scope of any assessments.

5. Pollution prevention and environmental management

5.1 One of SEPA's 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, temporary storage areas and any other site infrastructure.

5.2 We advise that the applicant should, through the EIA process, 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. Other pollution prevention and environmental best practice guidance that may be drawn upon includes that produced by CIRIA .

6.3 Any application involving large scale beach replenishment and/or dredging works should be cross checked as to whether the proposals lie within or close to a designated bathing water or shellfish growing water. Ideally all physical works should be done outwith the Bathing Water Season (1 June to 15 September) and spatfall periods. Please refer to the Bathing waters section of our website for further guidance on the Bathing Waters Directive (2006/7/EC).

6.4 A Construction Environmental Management Plan is a key management tool to implement the Schedule of Mitigation. We recommend that the principles of this document are set out in the supporting documentation 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. Best practice advice developed by The Highland Council (in conjunction with industry and other key agencies) on the Construction Environmental Management Process is available in the guidance note Construction Environmental Management Process for Large Scale Projects.

6. Flood risk

6.1 Any coastal development 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 the planning and flood risk section of our website, which also contains information on SEPA's role in flood risk.

6.2 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.

6.3 Climate change is placing increasing pressures on coastal marine environments. SEPA's guidance within this document helps to demonstrate SEPA's commitment to its public body duties under Section 44 of the Climate Change (Scotland) Act 2009, by assisting in ensuring that a consistent and proportionate approach is taken to maintaining the resilience of our coast to changes in our climate.

7. Onshore engineering activities in the water environment

7.1 In order to meet the objectives of the Water Framework Directive, the onshore components of the development should be designed wherever possible to avoid engineering activities in the water environment. 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 Scottish Planning Policy 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.

7.2 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.

7.3 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 supporting documentation . 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.

7.4 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.

8. Onshore water abstraction

8.1 Where water abstraction is proposed we request that the supporting documentation 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 CAR, the following information is required at the planning stage to advise on the acceptability of the abstraction at this location:

- Source e.g. ground water, the sea or surface water;
- Location e.g. grid reference 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.

8.2 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 supporting documentation should also contain a justification for the approach taken.

9. Existing groundwater abstractions

9.1 Roads, foundations and other construction works associated with large scale developments can disrupt groundwater flow and impact on groundwater abstractions. To address this risk a list of groundwater abstractions both within and outwith the site boundary, within a radius of i)100 m from roads, tracks and trenches and ii) 250 m from borrow pits and foundations) should be provided.

9.2 If groundwater abstractions are identified within the 100 m radius of roads, tracks and trenches or 250 m radius from borrow pits and foundations, then either the applicant should ensure that the route or location of engineering operations avoid this buffer area or further information and investigations will be required to show that impacts on abstractions are acceptable. Further details can be found in Appendix 2 (which is also applicable to other types of developments) of our Planning guidance on windfarm developments.

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 They can 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.

Regulatory advice for the applicant

11. Regulatory requirements

11.1 Authorisation is required under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) to carry out engineering works in or in the vicinity of inland surface waters (other than groundwater) or wetlands. Inland water means all standing or flowing water on the surface of the land (e.g. rivers, lochs, canals, reservoirs).

11.2 Management of surplus peat or soils may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011. Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012. Consider if other environmental licences may be required for any installations or processes.

11.3 A Controlled Activities Regulations (CAR) construction site licence will be required for management of surface water run-off from a construction site, including access tracks, which:

- is more than 4 hectares,
- is in excess of 5km, or
- includes an area of more than 1 hectare or length of more than 500m on ground with a slope in excess of 25˚

See SEPA's Sector Specific Guidance: Construction Sites (WAT-SG-75) for details. Site design may be affected by pollution prevention requirements and hence we strongly encourage the applicant to engage in pre-CAR application discussions with a member of the regulatory services team in your local SEPA office.

11.4 Below these thresholds you will need to comply with CAR General Binding Rule 10 which requires, amongst other things, that all reasonable steps must be taken to ensure that the discharge does not result in pollution of the water environment. The detail of how this is achieved may be required through a planning condition.

11.5 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 regulatory services team in your local SEPA office at:GGCE@sepa.org.uk

If you have any queries relating to this letter, please contact me by e-mail at planning.sw@sepa.org.uk

Yours faithfully

Julie Gerc
Senior Planning Officer
Planning Service

HISTORIC ENVIRONMENT SCOTLAND | ÀRAINNEACHD EACHDRAIDHEIL ALBA

By email to: [redacted]

Mr Neil Macleod
Marine Licensing Casework Officer
Marine Scotland (Aberdeen Office)

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131-668-8716
[redacted]

Our case ID: 300046431

29 September 2020

Dear Mr Macleod

The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017
Marine License - Renfrewshire Council (Per Sweco) - Infilling of Lobnitz Dock, Clyde Waterfront Renfrew Riverside (CWRR)
Request for Screening Opinion for the infilling of Lobnitz Dock

Thank you for your consultation which we received on 14 September 2020 seeking our comments on an Environmental Impact Assessment (EIA) screening opinion for the above proposed development. This letter contains our comments for our historic environment interests. That is world heritage sites, scheduled monuments and their setting, category A-listed buildings and their setting, gardens and designed landscapes and battlefields on their respective Inventories.

Your archaeological and conservation advisors will also be able to offer advice for their interests. This may include unscheduled archaeology, category B- and C-listed buildings and conservation areas.

Our Screening opinion

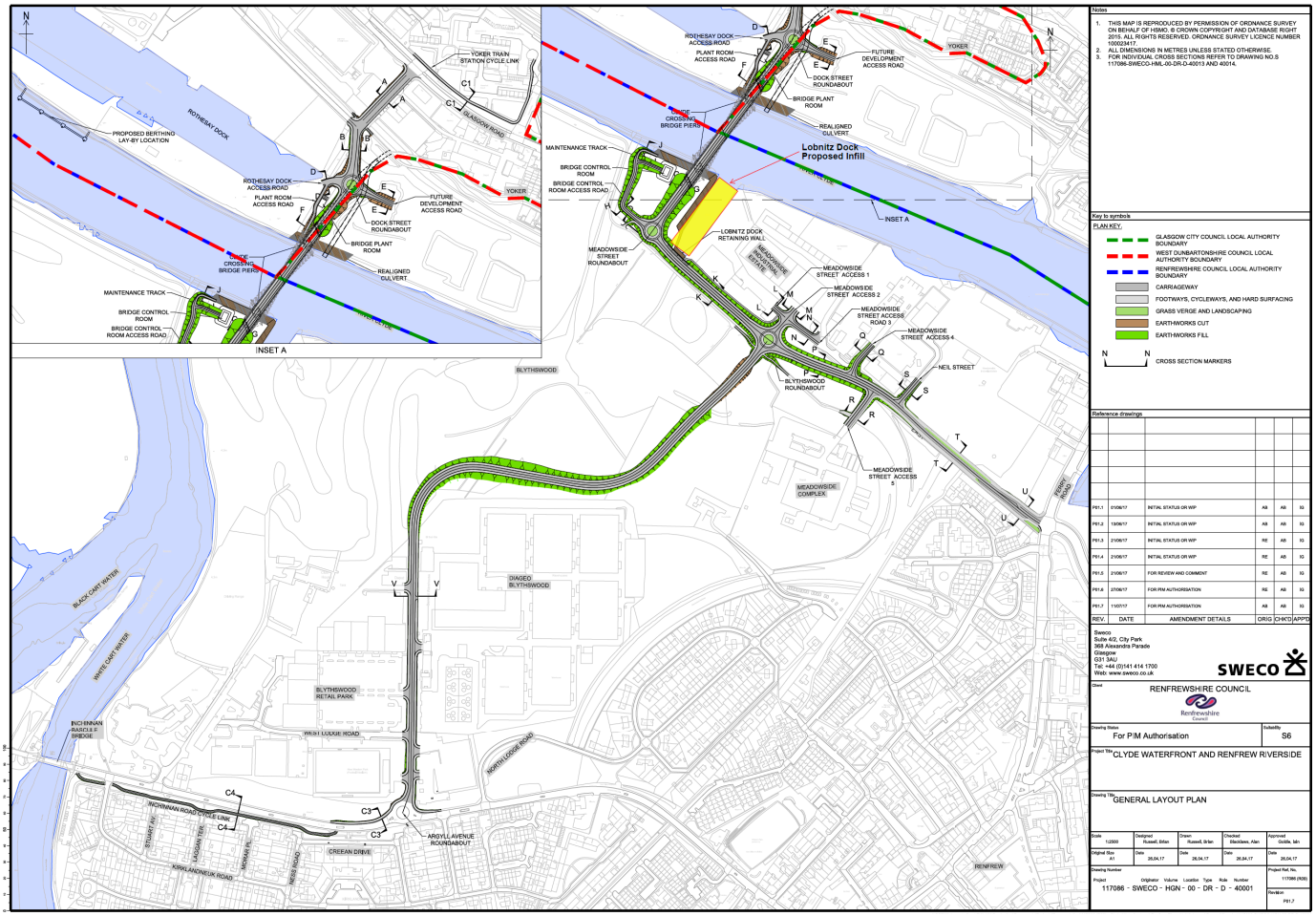
An EIA is not required for this proposed development. This is because there are no assets for our interests within the site or in its immediate vicinity.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Chloe Porter and they can be contacted by phone on [redacted] or by email on [redacted]

Yours sincerely

Historic Environment Scotland

Appendix II – Plan of the Proposed Works



Marine Laboratory, 375 Victoria Road, Aberdeen, AB11 9DB
ms.marinelicensing@gov.scot
http://www.gov.scot/Topics/marine/Licensing/marine