

Marine Policy Assessment



The following table provides an assessment of the proposal against the relevant policies of Scotland’s National Marine Plan (SNMP)¹ as required by Section 10 of the Marine Licence Application Form for Construction Projects.

SNMP Policy	Assessment of Compliance
<p>GEN 1 General planning principle</p> <p><i>There is a presumption in favour of sustainable development and use of the marine environment when consistent with the policies and objectives of this Plan.</i></p>	<p>The principle of the proposed works seek to maintain the existing structure through essential maintenance and will contribute to the long-term use of the existing Erskine Bridge structure within the marine environment. This will ensure its safety and continued operation.</p> <p>Overall, it is considered that the proposed works are consistent with the policies and objectives of SNMP and as such is considered to be compliant/not conflicting with Policy GEN 1 of the SNMP.</p>
<p>GEN 5 Climate change</p> <p><i>Marine planners and decision makers must act in the way best calculated to mitigate, and adapt to, climate change.</i></p>	<p>The proposed works will not necessarily reduce greenhouse gas (GHG) emissions during construction, however, will not result in an increase in vehicular movement post construction and when compared with relevant UK Carbon budgets and Scottish Carbon reduction targets no significant effect is assessed in relation to climate.</p> <p>In addition, the principle of the proposed works in refurbishing an existing asset to ensure its long-term use, is consistent with the objectives for climate change mitigation and adaptation identified at a national scale with respect to using existing assets.</p> <p>As such, the proposed works are considered to be compliant/not conflicting with Policy GEN 5 of the SNMP.</p>
<p>GEN 6 Historic environment</p> <p><i>Development and use of the marine environment should protect and, where appropriate, enhance heritage assets in a manner proportionate to their significance.</i></p>	<p>Erskine Bridge is a Category A listed structure; however, the proposed works comprise of necessary maintenance works to maintain its function and largely consist of like-for-like replacements and repairs.</p> <p>As proposed works seek to maintain the existing structure and its cultural integrity, they will contribute to the long-term use of the existing Erskine Bridge structure, therefore protecting and maintaining a statutory heritage asset.</p> <p>Consultation has been undertaken with Historic Environment Scotland (HES) and the relevant departments of West Dunbartonshire Council and Renfrewshire Council. Renfrewshire Council and HES had no comments to make with regard to listed building consent and the historic environment in relation to the proposed works, however, no response has been received to date from West Dunbartonshire Council, with consultation therefore ongoing (Appendix C of the Non-Statutory Review).</p>

¹ [Contents - Scotland's National Marine Plan - gov.scot \(www.gov.scot\)](http://www.gov.scot)

	<p>As such the proposed works are considered to be compliant/not conflicting with Policy GEN 6 of the SNMP.</p>
<p>GEN 7 Landscape/seascape</p> <p><i>Marine planners and decision makers should ensure that development and use of the marine environment take seascape, landscape, and visual impacts into account.</i></p>	<p>Proposed works comprise of maintenance of the existing structure, largely with like-for-like replacements of existing features and therefore there are no anticipated significant effects upon the seascape/landscape.</p> <p>As such the proposed works are considered to be compliant/not conflicting with Policy GEN 7 of the SNMP.</p>
<p>GEN 8 Coastal process and flooding</p> <p><i>Developments and activities in the marine environment should be resilient to coastal change and flooding, and not have unacceptable adverse impact on coastal processes or contribute to coastal flooding.</i></p>	<p>Proposed works comprise of maintenance of the existing structure therefore not giving rise to potential impacts on coastal processes, with the continued free movement of tidal waters in the surrounding water environment, and with no anticipated effects and contribution to flood risk.</p> <p>As such the proposed works are considered to be compliant/not conflicting with Policy GEN 8 of the SNMP.</p>
<p>GEN 9 Natural heritage</p> <p><i>Development and use of the marine environment must: (a) Comply with legal requirements for protected areas and protected species; (b) Not result in significant impact on the national status of Priority Marine Features; and (c) Protect and, where appropriate, enhance the health of the marine area.</i></p>	<p>A detailed consideration of the potential for any likely significant effects on the following European sites, as required under the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) has been undertaken within the Habitats Regulations Stage 1 Screening Assessment for the proposed works on the Erskine Bridge (as seen in the supporting document to the Marine Licence Application):</p> <ul style="list-style-type: none"> ▪ Inner Clyde Ramsar; and ▪ Inner Clyde Special Protection Area (SPA). <p>Mitigation measures to reduce potential significant effects upon designated sites are detailed within the Habitats Regulations Stage 1 Screening Assessment and the Non-Statutory Environmental Review, and with such mitigation measures in place it is concluded that there will be no likely significant effects upon the Inner Clyde Ramsar and SPA over the duration of the proposed works.</p> <p>With regard to Priority Marine Features, the nature of the maintenance works are unlikely to result in underwater noise and therefore not anticipated to impact marine species, such as fish, mammals, shellfish, and other invertebrates.</p> <p>As such the proposed works are considered to be compliant/not conflicting with Policy GEN 9 of the SNMP.</p>
<p>GEN 10 Invasive non-native species</p> <p><i>Opportunities to reduce the introduction of invasive non-native species to a minimum or proactively improve the practice of existing activity should be taken when decisions are being made.</i></p>	<p>No records of Invasive Non-Native Species (INNS) have been identified within 1km of Erskine Bridge (as per section 4.5 <i>Biodiversity</i> of the Non-Statutory Environmental Review).</p> <p>Access to the structure will be from the existing road network with no requirement for marine vessels/equipment, thus reducing potential pathways for transfer of INNS and non-native marine species.</p>

	<p>As such the proposed works are considered to be compliant/not conflicting with Policy GEN 10 of the SNMP.</p>
<p>GEN 11 Marine litter</p> <p><i>Developers, users and those accessing the marine environment must take measures to address marine litter where appropriate. Reduction of litter must be taken into account by decision makers.</i></p>	<p>Appropriate, full containment and other pollution prevention and control measures will be implemented to prevent pollution or debris from entering the water environment (for example where a temporary platform will be required for works grit-blasting).</p> <p>As such the proposed works are considered to be compliant/not conflicting with Policy GEN 11 of the SNMP.</p>
<p>GEN 12 Water quality and resource</p> <p><i>Developments and activities should not result in a deterioration of the quality of waters to which the Water Framework Directive, Marine Strategy Framework Directive or other related Directives apply.</i></p>	<p>There is potential for changes in water quality from pollution events, for example from grit-blasting or accidental spillage and runoff, which have the potential to have indirect effects on the River Clyde. Deterioration of intertidal habitat could degrade the feeding resource for bird species, however, full containment and best practice construction methods including those to protect the water, and natural environment will be implemented including the use of appropriate pollution controls (i.e. SEPAs Guidance for Pollution Prevention (GPPs)), and appropriate mitigation measures as outlined in the Non-Statutory Environmental Review. Such measures will be strictly in place to minimise the impact on the water environment, irrespective of the European designation.</p> <p>Furthermore, the Habitats Regulations Stage 1 Screening Assessment revealed no likely significant effects anticipated on the European designated sites and its qualifying features, as standard mitigation measures sufficiently control noise, vibration, and pollution and potential impacts arising from these elements.</p> <p>As such the proposed works are considered to be compliant/not conflicting with Policy GEN 12 of the SNMP.</p>
<p>GEN 13 Noise</p> <p><i>Development and use in the marine environment should avoid significant adverse effects of man-made noise and vibration, especially on species sensitive to such effects.</i></p>	<p>Following best practice and mitigation measures outlined within the Non-Statutory Environmental Review and Habitats Regulations Stage 1 Screening Assessment it is considered that any adverse noise or vibration effects associated with construction of the proposed works are unlikely to be significant.</p> <p>As such the proposed works are considered to be compliant/not conflicting with Policy GEN 13 of the SNMP.</p>
<p>GEN 14 Air quality</p> <p><i>Development and use of the marine environment should not result in the deterioration of air quality and should not breach any statutory air quality limits.</i></p>	<p>Vehicle traffic along the A898 and surrounding local roads is anticipated to be the dominant impact to local air quality, with the potential for congestion with traffic management in place during various works stages. Operationally, there will be no significant air quality effects as traffic flow, speed and composition of vehicles on the carriageway is not anticipated to change, thus increased vehicle emissions and pollutant release is unlikely.</p> <p>Following best practice and mitigation measures outlined within the Non-Statutory Environmental Review, which includes best practice measures outlined by the Institute of Air Quality Management</p>

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(IAQM) (2024), there are no significant impacts anticipated on air quality during, or as a result of the proposed works.

As such the proposed works are considered to be compliant/not conflicting with Policy GEN 14 of the SNMP.