PROPOSED REPLACEMENT TESCO STORE, MILNGAVIE

Preliminary Appraisal of Townscape & Visual Impacts

Prepared for We Like Milngavie by Land Use Consultants

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1 Introduction

Background

- I.I In July 2009, Tesco Stores Ltd. submitted a planning application for the development of a new retail store together with deck parking on the site of the existing Tesco store and car park at Gavin's Mill Road, Milngavie in East Dunbartonshire.
- 1.2 This proposed development would replace the existing store, providing a new and larger Class I retail store with increased parking capacity.
- 1.3 The application was subject to numerous representations from the local community which included 718 objections and 25 in support.
- 1.4 East Dunbartonshire Council's recommendation to the Planning Board was 'Disposed to grant subject to a Section 75 Agreement and Conditions'. The application was subsequently refused by the Planning Board. The reasons for refusal can be summarised as follows:
 - (i) "The proposed development would by reason of scale and massing result in an intrusive form of development out of keeping with the existing buildings in the vicinity" contrary to Council policy;
 - (ii) "The proposed development by virtue of its size, siting and design would have an adverse impact on the

- adjacent Milngavie Town Centre Conservation Area and detract from the setting and established character of the area" contrary to Policy HE7 and Policy DQ2A;
- (iii) "This proposal would have an adverse effect on the setting of Gavin's Mill Listed Building by virtue of its size, scale and visual dominance" contrary to Policy HE5;
- (iv) "The proposal would be contrary to the retail policies of East Dunbartonshire Local Plan";
- (v) "The proposed development would have a detrimental impact on Bearsden Town Centre" under the terms of the SPP;
- (vi) "The proposed development would increase traffic movements in the area and will increase traffic congestion to the detriment of the local road network" and "would have an adverse effect on our quality, both locally and within the surrounding area".
- 1.5 Tesco Stores Ltd. has appealed against the refusal and the community organisation 'We Like Milngavie' (WLM) has consequently commissioned Land Use Consultants (LUC) to undertake a Preliminary Townscape and Visual Impact Appraisal. It is the intention that this appraisal will provide information to support and inform WLM's continued opposition to Tesco Stores Ltd.'s current proposals.

Scope of the appraisal

- 1.6 The planning application submitted by Tesco Stores Ltd. was not subject to an Environmental Impact Assessment (EIA) and as a result many of the potential impacts of the development were not assessed or were not addressed in detail within the application's supporting documentation. WLM has questioned why an EIA was not requested by East Dunbartonshire and has commissioned LUC to examine at a preliminary level some of the potential environmental impacts of the development. LUC's remit is, therefore, to:
 - (i) review the EIA screening process undertaken by East Dunbartonshire Council:
 - (ii) undertake a baseline landscape and townscape review:
 - (iii) undertake a preliminary townscape and visual impact appraisal.
- 1.7 The above work draws on available information in the public domain, including the Design Statement and other supporting documents prepared on behalf of Tesco Stores Ltd.

Outline of the development proposals

1.8 The proposals submitted by Tesco Stores Ltd. include for the complete redevelopment of the existing store and car parking areas at Gavin's Mill Road in Milngavie Town Centre. The proposed new store would be located on the

area currently occupied by the main car park and would be developed on several levels including:

- car park level (basement);
- service yard level;
- main sales floor level;
- mezzanine level.

The new building would be approximately 120m long and between 50m and 90m wide (widest at its north-east elevation). Its footprint area would be approximately 8500m2 compared to the footprint of the existing store which is approximately 5000m2. The retail floorspace would, however, increase substantially due to the availability of two floors (sales floor and mezzanine) instead of one.

- 1.9 The proposed store would utilise the significant change in level between Woodburn Way and the existing car park to accommodate the different levels of the building. This proposal would effectively reduce the 'apparent' height of the building from Woodburn Way (i.e. to the equivalent of 2 storeys) whilst the south-east elevation would reveal the full height and scale of the building (equivalent to 4 storeys).
- 1.10 Car parking would be provided within the lowest level of the new store, accommodating 212 spaces, including disabled and parent and child spaces.
- 1.11 A separate car parking facility is also proposed for the site of the existing store. This would be a Deck car park (i.e. 2 levels of parking) capable of accommodating approximately

- 362 spaces (194 ground floor; 168 deck level). This brings the total car parking capacity within the proposals to approximately 574 spaces (compared to approximately 320 spaces in the existing car parks.
- 1.12 The proposals would require removal of the vegetated embankment adjacent to Woodburn Way and would widen Gavin's Mill Road.
- 1.13 Access from Milngavie Town Centre is facilitated by proposals to introduce a controlled pedestrian crossing on Woodburn Way and an access ramp/walkway leading around the building to the store entrance.
- 1.14 The above dimensions and characteristics represent the basis of the following appraisal.

2 Landscape and townscape review

Historical Context

- The historical development of Milngavie was largely based 2.1 on the textile industry which utilised the Allander Water as a source of water and power. Mills were developed which produced linen, cotton and paper along with other water dependant industries including corn milling, bleaching and print works. This industrial development resulted in numerous changes along the course of the Allander as older mills were replaced. In the centre of Milngavie, prior to development of the railway, the large Allander Print Works occupied the site now occupied by Kwik Fit and the Railway Station on the north side of the River. This was subsequently cleared and in the latter part of the 19th century, the large Ellangowan Cotton Mill was developed to the north-west of the town centre. This was served by its own branch rail line which followed the route of today's Ellangowan Road, passing beneath Douglas Street.
- 2.2 The development of Glasgow to Milngavie railway in 1863 not only stimulated further industrial development but also led to the residential expansion of Milngavie. This included both houses for the industry workers but also increasing numbers of gentrified developments for the incoming population. This late Victorian period consequently saw the significant expansion of Milngavie, and by 1875 it had

- reached Burgh status. The town continued to develop thereafter with the introduction of a wider range of services and more sophisticated architecture.
- 2.3 The 19th century core of the town developed on both sides of the Allander Water, bridged by Douglas Street, but Milngavie has subsequently extended in all directions around this core area. The historic street network within the core of the town is still clearly visible today and is lined by many fine buildings and features of architectural merit.

 Consequently, the centre of Milngavie was designated a Conservation Area in 1977.
- 2.4 Throughout the 19th century, the site of the Tesco store and car park was largely undeveloped and remained as fields through which a mill lade passed between the site of the present fish ladder and the Gavin's Mill underpass. Gavin's Mill, the oldest building in Milngavie Town Centre (reputedly dating from the 12th Century), is the only historic building remaining within the site.
- 2.5 Around 1970, a dual carriageway was developed which bypassed the town centre; some years later the bypass was renamed 'Woodburn Way'. This bypass severed the original approaches from the south and east, introducing pedestrian underpasses to retain linkages to the Station and to the course of the Allander Water, including the Gavin's Mill area and subsequently the Tesco site. The bypass was constructed on a high embankment which now forms part of the north-west boundary to the Tesco site.

The Townscape of the Conservation Area

- 2.6 The town centre of Milngavie was designated a Conservation Area in 1977, defined as an 'Area of special architectural or historic interest, the character or appearance of which is desirable to preserve or enhance'.
- 2.7 In 2005, East Dunbartonshire Council carried out an updated appraisal of the Conservation Area to re-assess the boundary, the affect and degree of change since the original designation and to consider broader management issues for Milngavie based upon the Scottish Executive's Planning Advice Note no. 71.
- 2.8 A desk study and site survey identified the key features of special architectural or historic merit. It also described its spatial patterns and other environmental features of interest which contribute to its character. These include the pedestrianised town centre, the Allander Water, and the network of pathways and lanes which link up Milngavie's unique town features.
- 2.9 To the west of the Woodburn Way bypass, the historic street pattern remains intact and the pedestrianisation of the central streets (Main Street, Douglas Street and Station Road West) has left a quieter, less polluted environment. These streets are lined by modestly scaled buildings, only occasionally exceeding 2 storeys in height. Typical architectural features include warm stone colours (both

- cream and red sandstones), barrel roofed dormers, slate roofs, roof turrets and cones and sash and case windows.
- 2.10 The streets are relatively intimate in scale and views are generally enclosed by the continuity of buildings and by deviations in the alignment of the streets. The Douglas Street Station Road axis is visually enhanced by its changes in direction at each junction (i.e. with Main Street and Mugdock Road). This characteristic closes views along these streets and allows certain buildings to be viewed from a variety of angles. A number of lanes and paths run off the principal streets and provide access to the centre's hinterland and to the Allander. These lanes also allow slot views away from the enclosure of the streets which enhance the visual interest of the town.
- 2.11 The town centre layout is informal, having to respond to the local topography and the course of the Allander. The urban blocks are small in scale (most less than 70metres in any direction) and streets are defined by relatively short terraces. The latter mostly comprise a number of conjoined individual buildings rather than single large architectural units. This gives architectural variety to the town centre.
- 2.12 The location of Milngavie on the valley of the Allander Water and the underlying topography, determines that there are elevated views over the valley from properties on the valley sides. Some of the elevated properties also

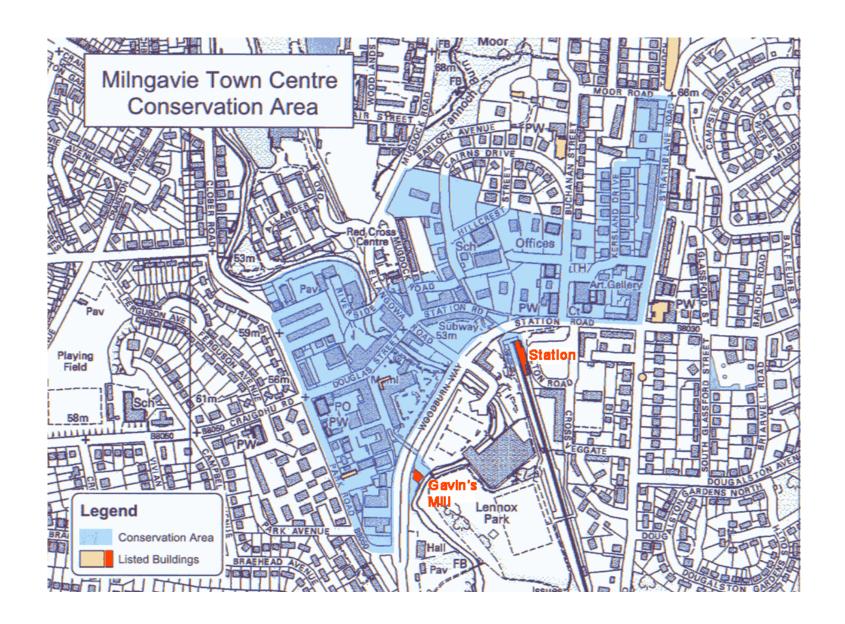
- appear as distinctive features on the skyline or as part of the backcloth to views of the town centre.
- 2.13 A number of listed buildings and other buildings of architectural or historic interest are located within the Conservation Area and further afield within the town. The Railway Station, the Blackbull Hotel, Gavin's Mill and Corbie Ha' are all listed buildings within the Conservation Area. The converted Old Parish Church also stands as a landmark, its spire being the most prominent structure in the town, visible from many vantage points and dominating views eastwards along Douglas Street.
- 2.14 Throughout Milngavie town centre and especially within proximity of the Allander Water, mature trees are significant features of the townscape. These are predominantly deciduous but many private gardens also have specimen conifers. The extent and density of the tree cover increases the intimacy of the town and creates visual / spatial containment in many areas. The belt of trees along Woodburn Way now effectively screens the large Tesco car park from most vantage points in the town centre.
- 2.15 During the latter part of the 20th century, Milngavie town centre has seen unsympathetic developments, most notably the BT tower building and the Kwik Fit building, both close to Woodburn Way. In addition, a number of buildings along Douglas Street have been introduced which while fitting in scale have little architectural merit.
- 2.16 Woodburn Way also appears incongruous in its scale, its severance has left the 'backlands' of the town centre

exposed and has necessitated long underpasses as the primary access routes for pedestrians. It appears therefore that the benefits of pedestrianisation for the core shopping streets have partially been to the detriment of other townscape considerations.

Pedestrian Access

- 2.17 The pedestrianised area of the town centre is connected into the surrounding urban fabric by roads and a number of pedestrian routes. Two strategic footpaths connect with Milngavie town centre; these are the 'West Highland Way' and the 'Allander Way'. These require passage through the long underpasses beneath the Woodburn Way dual carriageway. The West Highland Way is of international renown and draws many visitors to Milngavie, most of which arrive by train at Milngavie Railway Station then progress through the underpass to Station Road then Douglas Street. It is possible that these visitors would be able to see the proposed new Tesco store from locations on this route.
- 2.18 The Allander Way follows the course of the Allander Water through Lennox Park to the south before entering the existing Tesco site via footbridge(s). Currently it is possible to follow the river along the front elevation of the existing Tesco store and to continue past the fish ladder under Woodburn Way to the town centre. Between Lennox Park and the town centre, this walk passes through an environment of car parks and underpasses which is an unrewarding experience.

- 2.19 The Allander Way also connects with the town centre via the Gavin's Mill underpass but once again involves passage along the south-west end of the Tesco car park.
- 2.20 Minor pedestrian routes also link the shopping streets with the car park areas in their hinterland. These links include:
 - Main Street: to the Marks and Spencer car park 2 routes;
 - Douglas Street: 2 routes following the course of the Allander Water to rear car parking area;
 - Station Road: to the cark parking area behind the curved terrace of shops.
- 2.21 These are currently no crossings over Woodburn Way and the footway on its south-eastern side appears to be little used as a thoroughfare.



3 Preliminary townscape and visual impact appraisal

Potential Impacts on Townscape and the Conservation Area

- 3.1 The proposed development of a new Class I Tesco store adjacent to Woodburn Way would introduce for the first time a large footprint building on this site which is on a level with other buildings in Milngavie's town centre and Conservation Area.
- 3.2 The proposed store is approximately 120m in length and has a footprint area of 8500m², making it approximately 30-40 times the footprint of large detached residential properties in Milngavie and even larger than the footprint of typical semi-detached and terraced properties. While there is a precedent of large industrial buildings in Milngavie, none of the large mills remain today and none of the largest mills occupied the Tesco site. The existing Tesco store is a large footprint building but its deliberate siting at low level and the screening by landforms and planting significantly minimise its impact on the town centre streets from where it is invisible from most vantage points. The existing store does not therefore define urban spaces with the town centre or attempt to create a 'street' as does the proposed new store.
- 3.3 The I20m length of the Woodburn Way elevation is longer than the longest terraced developments in the town centre i.e. on Main Street, Douglas Street and Station Road.

- However, the latter comprise numerous individual properties and typically have shops on the ground floor with mixed uses above. Typical shop/business frontages are between 5m and 10m wide, each with its own doorways. This determines that the terraced developments within the town centre have considerable visual /architectural variety and general activity in the street from shoppers and visitors. There is also a dynamic quality to the numerous shop windows associated with activity inside the premises and changing window displays.
- The extensive Woodburn Way elevation of the proposed Tesco store would consequently introduce a development of incomparable scale with the present Milngavie town centre (and Conservation Area) buildings and would also create an elevation which would redefine Woodburn Way as a 'pseudo' street. However, this elevation represents the rear of the store and would consequently bring little street life or dynamism to Woodburn Way. It would create a barrier to views over the Allander valley as discussed below and would weaken or break the historic relationship between the town and the valley, including the important greenspace Lennox Park which would become less visible and potentially landlocked by the new development.
- 3.5 As discussed in Section 2, Woodburn Way has created severance which is detrimental to public access and which has exposed the backlands of Main Street, Douglas Street

- and Station Road. Urban repair of the severance, on the north side of the bypass could be contemplated if Woodburn Way were to be reduced to a single carriageway. The possibility for the future enhancement of the town centre would potentially be denied by the proposed Tesco development.
- 3.6 With regard to impacts on Conservation Area, it is evident that the proposed store would be of unsympathetic in scale to the character of typical buildings within the Conservation Area. The setting of the Conservation Area would, as discussed above, be detrimentally affected by the loss of tree cover along Woodburn Way and the closure of views over the valley of the Allander Water and Lennox Park. From further afield, especially from the south and east, the massive scale of the proposed stone would be visible in the foreground of the Conservation Area and would therefore affect its settings and perceptions of its character.
- 3.7 With specific regard to Listed Buildings within the Conservation Area, the proposed development would potentially affect the setting of Gavin's Mill and the Railway Station. It is acknowledged that the setting of these buildings is current marred by the poor environmental quality associated with the adjacent car parks, roads and underpasses. However, the proposed new store will introduce a large scale building extending to the equivalent of 4 storeys in proximity to these relatively small scale Listed Buildings. This juxtaposition of massive retail store in proximity to the listed buildings would potentially reduce their visual significance on the townscape, and make it more

- difficult to appreciate their heritage and architectural merit. Given the visual separation created by the Kwik Fit site, it is likely that the station would be less affected than Gavin's Mill.
- 3.8 Pedestrian access routes through the proposed development site would preserve all existing links to the town centre and to the Allander Way. Within the site these routes would be modified including some improvements to the public realm at the Gavin's Mill underpass. Little has been made, however of the opportunity to significantly enhance the course of Allander Water which remains within the constrained channel, partially covered by walkways and bridges.

Potential townscape impacts - summary conclusion

- 3.9 In summary, it is considered that the main impacts on townscape and on the Conservation Area would be as follows:
 - the proposed new store would introduce a building which is incomparable in scale and character with existing buildings in the Conservation Area and town centre generally;
 - spatially, the new store would define a new urban edge to Milngavie town centre along Woodburn Way and would sever the visual relationship between the town centre and the lower Allander Water valley, including Lennox Park:

- the north-west elevation of the store would be longer than the existing urban blocks and terraced developments in Milngavie town centre;
- the above elevation represents the rear of the store and would, therefore, not generate 'street life' along Woodburn Way;
- the Woodburn Way elevation would redefine the character of the bypass making it a pseudo-street rather than a tree lined road corridor:
- the length of the above elevation is equivalent to approximately 12 to 15 individual businesses/premises within the town centre streets, but lacks the mixed use activity and architectural variety of the town centre;
- the development would be seen in the foreground of the Conservation Area from vantage points to the south and east, thereby detracting from its setting and altering perceptions of the townscape character;
- the proposed development would encroach on and visually diminish Gavin's Mill Listed Building to the detriment of its setting;
- the proposed development would not significantly affect existing pedestrian links through the site but fails to achieve significant enhancements along the Allander Water;
- the severance caused by Woodburn Way and its effect on the integrity of the town centre urban blocks would

be compounded by the development of a large building which reinforces the severance effect of this road.

Potential Visual Impacts

- Assessment within Tesco's planning application, a preliminary attempt to assess these impacts has been made using available 'visualisations' of the development prepared on behalf Tesco's and by appraising the potential effects of the development from a number of viewpoints, selected by WLM as representing important and popular vantage points within the vicinity of the development.
- 3.11 It has not been possible within this study to produce an analysis of Theoretical Visibility (i.e. a Zone of Theoretical Visibility map) but from fieldwork it has been possible to identify the approximate extent of the proposed buildings visibility. Currently the numerous trees, tree lines and woodland belts within Milngavie town centre represent important visual horizons and screens. Most of these trees are, however, deciduous and consequently intervisibility will increase during the winter months or as a result of any tree losses/removals.

Viewpoint analysis

3.12 This analysis utilises 6 no. of the visualisations prepared by Tesco Stores Ltd. and provides a comparison with the closest possible representation of the views from the same viewpoints today. This allows an approximate 'before and

after' comparison of the views, enabling the main visual impacts to be described.

Viewpoint 1: Woodburn Way looking north

- 3.13 Viewpoint I is taken from the west side of Woodburn Way adjacent to the Doctors' Surgery and close to the bus stop. It is, therefore, representative of views across the site from private vehicles on Woodburn Way, from buses, from the well used surgery, from the adjacent sheltered housing and from the public footway leading to the town centre.
- 3.14 Viewpoint I encompasses the Woodburn Way corridor and the adjacent footways, verges and vegetation. The dual carriageway with its raised central reservation is, therefore, prominent in the foreground and middle ground. Tree cover on the embankment below (to the east of) Woodburn Way is a significant visual boundary which blocks views over much of the site from this vantage point. However, the gap in the trees at the underpass allows a longer view over the roof of the existing Tesco store and valley of the Allander Water to the higher ground of the Glassford Street, Barloch Road and Balfleurs Street area to the east. Numerous houses are visible on this hillside and conversely views of the site will be possible from several residential properties to the east.
- 3.15 Tree cover is a significant feature of the view. This is predominantly deciduous although specimen conifers can be seen in the gardens of properties to the east of Strathblane Road. The tree cover generally comprises a mixture of

lime, ash, horse chestnut, maples, beech and poplar with some large shrubs in localised areas. Several belts of trees exist including those along the banks of the Allander Water, beside Woodburn Way and around the existing Tesco store. Intervisibility increases during the winter months with the loss of leaves. Gaps between or under trees also allow slot views over the site, are also possible from other locations on Woodburn Way.

Viewpoint 1: Proposed development

- 3.16 The visualisation produced on Tesco Stores Ltd.'s behalf does not represent a 'photomontage' but it is assumed to be a dimensionally correct interpretation of the proposed building for the purposes of this appraisal. The visualisation clearly demonstrates how the proposed building would redefine the eastern side of Woodburn Way, removing the existing tree belt and vegetated embankment over c.120metres.
- 3.17 Views to the east from Woodburn Way and from parts of the town centre would consequently be blocked by the proposed building. This would include the loss of long views across the valley, as from Viewpoint I and from other vantage points where views are possible between or under tree canopies.
- 3.18 The long western and southern elevations of the proposed store would create a new solid barrier to views eastwards and north-eastwards. This visual barrier would be equivalent to 2 storeys in height and despite architectural

- devices to break up the mass of the building, it would lack an active frontage, e.g. it has no shop fronts or access points along Woodburn Way to generate street life activity or to provide a dynamic street scene.
- 3.19 The scale of the proposed building and its proximity to Woodburn Way determines that it will have a significant visual impact from this viewpoint, and from other viewpoints along or close to the Woodburn Way corridor due to the number of receptors moving through the area on foot, by private and public transport. The loss of mature trees and the blocking of views over the valley of the Allander Water would be a loss of amenity and by altering the visual relationship between the town centre and the Allander Water valley, would change the character of the town centre.

Viewpoint 2: Woodburn Way looking south

- 3.20 Viewpoint 2 also encompasses the Woodburn Way corridor, its roadside railings and vegetation growing on the embankment. Like Viewpoint I, this view demonstrates the importance of tree cover within the context of Milngavie generally, and its role in enclosing the existing Tesco development.
- 3.21 The change in level between Woodburn Way and the existing Tesco store and car park also determines that Woodburn Way provides a number of elevated vantage points. The latter allow passing pedestrians and motorists

- to look down and across the Allander Water valley through gaps in the tree cover and during winter months.
- 3.22 The level of Woodburn Way relative to the existing Tesco car park and store also determines that little of the car park and only the roof of the existing store are visible from the western side of the dual carriageway. The tree belt which wraps around the existing store provides a backcloth to this low level building and helps its visual integration in the valley floor, despite its large footprint.

Viewpoint 2: Proposed development

- 3.23 The Viewpoint 2 visualisation illustrates that the proposed building would remove the existing mature tree belt and would block views over and across the lower ground of the Allander Water valley.
- The architectural proposals seek to introduce visual interest to the building's rear elevation and to disguise the large scale of the building through the use of different cladding materials/colours, window/glazing panels, a line of trees and through the expression of internal uses in the articulation of the west elevation. However, these devices do not effectively disguise that this prominent elevation is the rear of the building and lacks any street front animation or activity. Viewpoint 2 visualisation, therefore, demonstrates that the development would largely enclose Woodburn Way with a blank elevation without doorways, shop fronts or other devices which might otherwise create an active street front on Woodburn Way.

Viewpoint 3: From approach road/secondary car park

- 3.25 Viewpoint 3 is taken from the south-western corner of the secondary car park (close to the north-west corner of the existing store). It is representative of the view from the approach road for the proposed store. This view aligns with the course of the Allander Water where it currently runs along the front of the store. It is a view that would be experienced by those seeking to join the Allander Way or those accessing the store from the car park or direction of the railway station.
- 3.26 This view is currently framed by the north-west elevation of the existing store and by vegetation growing along the west bank of the Allander Water. The yellow brick elevation, pyramidal slate roof of the store entrance and the cantilevered walkway above the Allander Water are key features of this view. Dense trees and shrubs screen the existing car park from this vantage point. Beyond the store is a backcloth of mature trees associated with Lennox Park and the course of the Allander Water further south.
- 3.27 The blank brick walls and intrusion of walkways into the course of the river are negative aspects of this view.

Viewpoint 3: Proposed development

3.28 The visualisation of the proposed development from Viewpoint 3 illustrates the north-east corner and eastern side of the proposed store, together with the Allander

- Water which bends around and along the 'front' of the building in a narrow channel.
- 3.29 This view portrays the highest elevation of the proposed building, incorporating the Atrium and main entrance to the store. From the low ground to the east of the store the four levels of the building can be readily appreciated by the extensive use of glazing and open views to the lower-ground parking level.
- 3.30 It is evident from this visualisation that the east elevation would be a dramatic and significant change to the townscape of Milngavie town centre, particularly when viewed from the east and south-east from where the building would become the foreground to Milngavie town centre and the Conservation Area. It is anticipated that this impact would be especially significant in winter evenings when there would be reduced screening from adjacent tree belts and when the store's illuminations would be seen through the extensive glazed walls.
- 3.31 This visualisation also illustrates that the opportunities represented by the Allander Water have not been optimised. Conversely, the watercourse has been strictly confined within an engineering channel, partially covered once again by cantilevered walkways. The visualisation indicates vegetation within the course of the river but it is unclear how this would be achieved.

Viewpoint 4: Looking towards Gavin's Mill

- 3.32 Viewpoint 4 is adjacent to the existing Tesco store entrance and the Allander Water. Due to the density of riverside vegetation, it was not possible to duplicate the visualisation viewpoint exactly but this photography captures the main elements in the vicinity of Gavin's Mill.
- 3.33 The view demonstrates that the setting of Gavin's Mill is currently dominated by the car park and by the high Woodburn Way retaining wall. The extensive bitmac surfaces parking bays and road/bay delineation devices and ranks of parked cars are prominent in the view and detract from the setting of Gavin's Mill (listed building).
- 3.34 The stone faced retaining wall to Woodburn Way dwarfs the Mill Building and reduces its prominence. However, the wall is partially obscured by mature trees which wrap around the back and sides of the Mill and extend above Woodburn Way. In the background, the squat tower of the BT building is a prominent and incongruous feature, being the only tower block in Milngavie. Its relative height (4 storeys) and elevated location make it visible from many locations in Milngavie, especially its roof-top antennae which are distinctive in silhouette.

Viewpoint 4: Proposed development

3.35 The Viewpoint 4 visualisation suggests that vegetation along the banks of the Allander Water would be thinned and managed to increase intervisibility between the Lennox Park riverside footpath and the development site. In this case,

- views of the proposed store and of Gavin's Mill would be less obstructed by trees than would be possible at present.
- 3.36 The proposals for the Gavin's Mill and underpass exit area include the formation of a vehicular turning area and improvements to the pedestrian pavements between the underpass and the Allander footbridge link to Lennox Park and the Allander Way. These proposals would remove parked cars from the vicinity of Gavin's Mill thereby improving its immediate setting as the visualisation suggests.
- 3.37 The south elevation of the proposed store would, however, be approximately 35 metres from Gavin's Mill and at ground level would be understorey parking providing no amenity to people passing through the space or following the Allander Way. The ramped access and external walkway around the south end of the proposed store would, however, provide views of Gavin's Mill over the turning/underpass exit area. The visualisation also illustrates how the scale of the proposed store would dwarf the historic mill building, i.e. being approximately 2 storeys higher and many times its footprint area.

Viewpoint 5: From Lennox Park looking north

3.38 The photograph from Viewpoint 5 is taken at the Allander Way footbridge where it connects with the car park area and underpass link paths. It is representative of a very popular walking route along the Allander Way and between Lennox Park, Milngavie town centre and the existing Tesco store.

3.39 At present, the view encompasses the existing Tesco car park with its asphalt roads, block paved parking bays, hedge divisions and treed framework. This view demonstrates how effectively the car park is currently enclosed and screened by mature trees growing on the embankment below Woodburn Way and along the course of the Allander Water. Further tree planting, hedges and shrubs within the car park help to break up the scale of parking areas and reduce the visual impact of parked cars. From this viewpoint, very little of Milngavie town centre can be seen due to the density of tree canopies; only the church spire on Station Road/Buchanan Street is visible in this direction, although more buildings may be visible during the winter months.

Viewpoint 5: Proposed development

3.40 The visualisation from Viewpoint 5, like that from Viewpoint 4, suggests the removal or thinning of vegetation on the banks of the Allander which would open up views from the riverside path in Lennox Park. This view would be partially filtered by trees but would take in much of the south-east and south-west elevations, including the Atrium and Walkway around the south end of the building. It demonstrates more clearly than Viewpoint 4 how the understorey parking level would be prominent from pedestrian vantage points at the level of the existing Allander Way. This visualisation also conveys how the space adjacent to Gavin's Mill and the underpass exit (which represents a key link to Milngavie town centre) would be

- edged by an understorey car park with no architectural contribution to that important space.
- 3.41 This visualisation conveys the large scale of the proposed building and demonstrates how it would redefine the horizon from many vantage points to the south and east. It would remove the existing tree belt which currently forms the visual boundary from these directions, and would permanently block views or glimpses of the town centre buildings to the north or west.



- before + after viewpoints
- selected views
- slot views



Viewpoint I: Woodburn Way looking North - before



Viewpoint I: Woodburn Way looking North - after



Viewpoint 2: Woodburn Way looking South - before



Viewpoint 2: Woodburn Way looking South - after



Viewpoint 3: View from Approach Road - before



Viewpoint 3: View from Approach Road - after



Viewpoint 4: View towards Gavin's Mill - before



Viewpoint 4: View towards Gavin's Mill - after



Viewpoint 5: View from Lennox Park northwards - before



Viewpoint 5: View from Lennox Park northwards - after

Selected viewpoints

- 3.42 The visualisations produced on behalf of Tesco Stores Ltd. were intended to illustrate the appearance of the proposed building rather than represent its visual impact. 'We Like Milngavie' has consequently identified a number of additional viewpoints on behalf of the community which represent popular or well used/trafficked locations. These selected viewpoints include:
 - (i) Lennox Park Flagstaff (from south);
 - (ii) Lennox Park east gate and railway footbridge (from south-east);
 - (iii) railway station (from north-east);
 - (iv) Marks & Spencer's entrance (from north-west);
 - (v) Town Hall (from north-east, more distant);
 - (vi) B8030 Glassford Street/Barloch Road area (high ground to the east).
- 3.43 These views are described in the following paragraphs and illustrated by photograph. Where possible the approximately roofline of the proposed development has been indicated. In the absence of digital design information, it is not possible to produce an accurate wireframe model or photomontage, however, this could have been produced by Tesco Stores Ltd. as part of a detailed Landscape & Visual Impact Assessment, had this been required by East Dunbartonshire Council.

Selected view: Lennox Park Flagstaff

The Flagstaff hill in Lennox Park is a popular elevated vantage point which provides views over the playing fields to the south and towards Milngavie town centre over the tree belts in the middle ground. This view demonstrates that the former church and school buildings adjacent to Cairns Drive, together with buildings on the south side of Station Road, are visible through a gap in the tree cover. The clock tower and spire is particularly prominent in this view (and in others within the town centre). The red dashed line indicates the approximate roofline of the proposed Tesco store which is judged to be parallel and just below the roofs of the Station Road properties. This determines that part of the proposed store would be visible from this viewpoint and that this part would be a glazed section of the south-east elevation. During winter months it is likely that a greater extent of the store would be visible and at night the internal lighting visible through the glazed panels, would become an obtrusive feature in this view. Any subsequent loss of tree cover would also increase the visibility of the proposed store from this viewpoint. The former church spire and school building would remain visible above the store's roofline from this viewpoint.

Selected views: Lennox Park east gate/railway footbridge

3.45 This view is taken at the east gate to Lennox Park adjacent to the railway footbridge, one of the main access routes into the park from the east. This view is also representative of

- views from within the eastern part of Lennox Park including the footpath which follows its eastern boundary.
- 3.46 The view is dominated by the red blaes football pitch in the foreground and it is notable how well the park is enclosed by tree belts, woodland and landforms. This determines that little can be seen of buildings in the neighbouring areas, a notable exception being the BT tower at the south end of the town centre. The latter is visible beyond and above the trees behind the Flagstaff hill described above.
- 3.47 At the north end of the playing field is an embankment and wooded area created to screen the existing Tesco store c.20 years ago. The woodland is now mature and creates a dense visual boundary which together with the embankment, completely disguise the presence of the existing store from this viewpoint. It is judged that the height of the trees would also screen much if not all of the proposed new store from this viewpoint in summer months. It is possible that a small section of the store's southern corner would be visible adjacent to the BT tower. The loss of leaves in winter may also allow filtered views of the store's upper level. The proposed car parking deck would be of a similar height to the existing store and would, therefore, not be visible from this viewpoint. The loss of woodland and alteration of landforms along the north edge of Lennox Park could significantly change this situation and allow more extensive views to and from the proposed store and Lennox Park.

Selected views: Railway Station

- 3.48 This view is taken from the Railway Station platform looking south east towards the site. It is representative of views taken by commuters and visitors to Milngavie, including the significant numbers who walk the West Highland Way, starting in Milngavie town centre.
- The current view is somewhat unrewarding as it is dominated by the secondary Tesco car park, service yards and roads. The main site is screened by tree cover adjacent to the Allander Water and around the Kwik Fit building which occupies the adjacent site on the corner of Gavin's Mill Road and Station Road. The top of the BT tower is just visible above the trees in the middle ground which indicates that the proposed store would not be visible from the viewpoint unless the tree belts were removed or thinned in the future. It is possible that the proposed engineering works associated with the new approach road and recycling facilities could reduce free cover adjacent to the Allander Water. These engineering works would also replace the secondary car park and service yard with roads, deck parking ramp and soft landscape islands. Of these it is likely that the ramp would be most visible from the railway line.

Selected views: Marks & Spencer's Entrance

3.50 The viewpoint is located at the entrance to the Marks & Spencer's store looking south-eastwards towards the Tesco site over the Marks & Spencer car park and Woodburn Way. This store and its car park are heavily used facilities

- and the through route from the precinct is a convenient pedestrian link to the other parts of the town centre.
- 3.51 The view is currently dominated by the car park in the foreground, the ubiquitous bitmac surfaces, white lined parking bays and ranks of parked cars. In the middle ground is Woodburn Way which is partially screened by trees and shrubs along the perimeter of the Marks & Spencer car park. The main visual horizon is formed by the tree belt along the east side of Woodburn Way although the tops of distance trees are also visible to the east (left side) of the view. No part of the existing Tesco's store or car park is visible from this view, giving the impression of a wooded valley below and beyond Woodburn Way. The extensive tree cover plays an important role in this impression and helps to provide visual containment for the town centre.
- 3.52 The dashed yellow line indicates the approximate roofline of the proposed store. This outline demonstrates that the large scale of the building would almost entirely close this view whereby the trees would be replaced by the northwest elevation of the proposed store. This would break the visual relationship between Milngavie Town Centre and the lower valley of the Allander Water. Approximately I20m of Woodburn Way would be lined by the rear elevation of the new store as discussed earlier.

Selected views: Town Hall

3.53 This view is taken from outside the Town Hall and looks south-westwards towards the Tesco site. In the foreground

is Station Road and visible through the trees is a glimpse of the listed Railway Station building and its car park. Once again, the mature tees associated with the road corridor embankments and car park margins create a screen or filter to this view. This denies distant views down the Allander Valley and prevents sight of the Tesco site, at least during the summer period. It is possible that more distant views would be possible during winter or from the upper floors of the Town Hall but in its current condition it appears that little would be visible of the proposed Tesco store from this viewpoint. The loss of trees from the Railway Station area could however open views to the proposed store.

Selected views: Baldernock Road (B8030)

This view is taken from Baldernock Road on the hill to the east of the Tesco site. This area is visible from Woodburn Way and overlooks the proposed development site from the east. This photograph demonstrates however, that while several of the residential properties overlook the valley from this are, it is not possible to obtain an unobstructed view from the public roads or footways. The combination of houses, garden walls, garages, hedgerows and trees within private gardens obstruct views from the roads. In this photograph a long view down Baldernock Road, and across the Strathblane Road junction to Station Road is possible however a wider panorama taking the Tesco site to the south-east is blocked by the dense planting of the adjacent gardens, including evergreen shrubs and tall cypress trees.

3.55 Despite the above obstructions it is evident from other viewpoints that several residential properties in this area have views over the valley, which also encompass the Tesco site. The visual impact of the proposed development during summer and winter, daytime and night time periods should ideally be assessed by the developer.



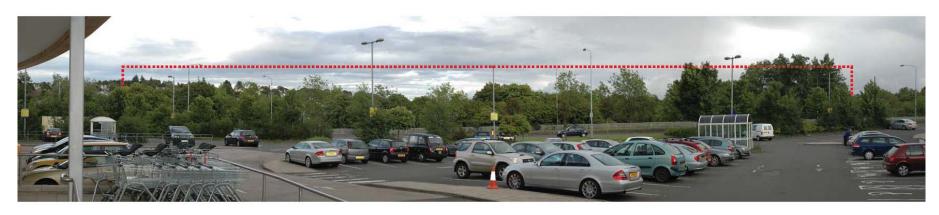
Selected View A: view from Lennox Park Flagstaff



Selected View B: view from Lennox Park East Gate



Selected View C: view from railway station



Selected View D: view from Marks & Spencer's



Selected View E: view from Town Hall



Selected View F: view from Baldernock Rd

Review of slot views

- 3.56 In addition to the above selected viewpoints, LUC has undertaken a cursory examination of slot views from the town centre towards the Tesco site. These views have been taken along access corridors which run broadly in a north-west to south-east direction. The purpose of this exercise was to determine whether the proposed development would impact on the character of the town centre streets by appearing in or dominating slot views along well used footpaths, lanes and roads.
- 3.57 The results of this appraisal are summarised as follows:
 - i) Hillhead Street to Station Road(w): characterful pedestrianised lane steeply sloping down to Station Road. The view is closely contained by historic buildings, walls and mature trees. There is no view of the Tesco site and would be no view of the proposed Tesco store unless potentially if trees were lost.
 - ii) Station Road looking south at east end of terraced shops: this view follows the line of a footpath leading to car parking behind (south of) the shops. Once again the view is curtailed by tree and shrub planting around and within the car park. It is possible that filtered views of the proposed building would be possible during the winter months and

- views from the back of the terrace would potentially overlook the car park and trees to gain a view of the Tesco store's north and west elevations (or parts thereof).
- iii) Ellangowan Road looking south-east from the Douglas Street Bridge. Ellangowan Road is framed by tree planting and self seeded vegetables which blocks views of the Tesco site in this view. The loss of trees from the foreground of this view would potentially open up a view line to the south but there are other tree belts beyond (associated with the Allander Water and Marks & Spencer car park) which could screen or partially screen the proposed Tesco store from the viewpoint.
- iv) Allander Water (east) looking south down the path adjacent to the Allander Water on its east side: from this location views are closely curtailed by vegetation growing along the edge and within the course of the Allander Water. The Tesco site is not visible and it is judged that the proposed new store would not be visible from this viewpoint unless substantial amounts of vegetation were removed from the vicinity.
- v) Allander Water (west) looking south down the well-used path leading to the rear car

park, Woodburn Way underpass, the fish ladder and Tesco's car park. This view is partially constrained by the building in the foreground and is terminated by the trees and shrubs which wrap around the northeastern corner of the car park. Views of the proposed Tesco store would be largely or wholly blocked by the building in the foreground from this viewpoint.

Main Street looking south: the vi) pedestrianised Main Street has been severed by the development of Woodburn Way and continuity southwards can only be obtained via the underpass. The south end of Main Street is now closed off by retaining walls and a soft landscape area which contains a number of large deciduous trees. The latter now terminate the view southwards down Main Street. From this viewpoint it would not be possible to see the proposed Tesco store, however, views from the rear elevations of buildings on the east side of Main Street would be dominated by the new building.







slot view ii) slot view iii) slot view iii)







slot view iv) slot view v) slot view vi)

Potential visual impacts- summary conclusions

- 3.58 The potential visual impacts of the proposed development can be summarised as follows:
 - The proposed store will redefine the south-east edge of Woodburn Way adjacent to Milngavie town centre thereby removing the existing mature tree belt and closing views from the town centre to the lower Allander Water Valley.
 - The replacement of trees with a 120m long building (equivalent of 2 storeys height c. 8 metres) will remove the perception of a wooded valley below Milngavie.
 - The proposed store will be viewed by passing motorists, public transport users and pedestrians travelling on Woodburn Way.
 - The proposed store will be overlooked from numerous properties on the higher ground to the north-west and east, and from residential properties at town centre level, notably residential apartments above shops on Station Road (south side), Main Street (east side), Main Street (west side) next to the telephone exchange and from the sheltered housing at Fairview Court.
 - The high south-east elevation of the store is the equivalent of 4 storeys in height (c. 12-15metres) and is largely glazed and giving the potential for

- sunlight reflections and night time light pollution in addition to its visual impact due to the scale and form of the building, especially when viewed from high ground to the east.
- The Woodburn Way elevation, despite architectural articulation, represents the rear of the store and is consequently a lifeless façade with regard to access or shop front interest.
- Any future loss of trees from within Milngavie's town centre area could open up views of the proposed stone from numerous vantage points. This could be to the detriment of the intimate character of the town centre and the amenity in the areas affected.
- It is recognised that the proposed location of the store has demanded an architectural solution to all four elevations which is untypical for supermarket developments. There are merits in the quality of materials proposed but the large scale of the development negates these attempts to complement the local townscape regardless of subjective views on the modern design.

Opportunities for Mitigation of Impacts

Notwithstanding the concerns regarding the potential townscape and visual impacts discussed above, there are a number of opportunities to mitigate or at least ameliorate the effects of the design proposals submitted by Tesco Stores Ltd i.e. in the event that Tesco's appeal is successful. Some of these measures would not change the fundamentals of Tesco's proposals but may enable some improvements. These opportunities are outlined below and have clearly not been subject to any design feasibility testing:

- i) Redevelopment of the existing Tesco retail store within its current footprint could provide an enhanced retail experience without a substantial enlargement of the store. A modest increase in height enabling a mezzanine level may be possible without significant townscape or visual impact;
- ii) Development of a new store which does not extend above the level of Woodburn Way could potentially incorporate a green roof / roof garden and allow views over the Allander Valley to be retained;
- iii) Modify the proposed development to create a generous and meaningful public realm / civic space area adjacent to Gavin's Mill underpass and Allander Way linkages. Ideally this would include an active façade at ground level;
- iv) Modify the proposed development to create a landscape corridor along the course of the Allander Water through the development

- site i.e. avoiding construction of the channel with extended walkways, culverts etc.;
- v) Modify the existing proposals to incorporate store entrances on Woodburn Way as well as the south-east elevation;
- vi) Modify the design to incorporate more active 'shop front' elements on the Woodburn Way elevation:
- vii) Modify the design by creating greater articulation of the Woodburn Way and south-east elevations to mitigate the appearance of a large monolithic structure in the landscape. This articulation might provide spaces for more tree planting to break up the long elevations.

4 Review of EIA screening process

- 4.1 Land Use Consultants (LUC) were commissioned by 'We Like Milngavie' (WLM) to undertake an independent review of the EIA screening process carried out by East Dunbartonshire Council in relation to the proposed Tesco Extra Development in Milngavie.
- 4.2 The proposed development falls under Schedule 2.10(b) of the Environmental Impact Assessment (Scotland)
 Regulations 1999 relating to 'Urban development projects', including the construction of shopping centres and car parks. The applicable threshold for this category of project is if the area of the development exceeds 0.5 hectares. As the proposed development site is 6.07 acres (approximately 2.5 hectares) the project exceeds this threshold. Schedule 2 projects are deemed to require an Environmental Impact Assessment (EIA) if the particular project is judged likely to give rise to significant effects.
- 4.3 According to the Planning Officers Development Quality Report to Committee dated April 2010, the application was screened in accordance with Regulation 5 of the EIA regulations and it was concluded that the proposed development is unlikely to have an overall significant environmental effect. The main reasoning cited was that:

"the proposal is a redevelopment to an existing superstore with associated parking that currently occupies the site. Given the existing use of the site for a similar development, albeit a smaller scale and in a different location within the site, any accompanying effects on the environment are likely to be limited. This forms part of a baseline or existing environment. Furthermore, the site is within the defined Town Centre and a built up urban area in which such land uses are anticipated and directed through National Policy.

Notwithstanding the above opinion, the applicant has submitted the above specialist reports to demonstrate the actual and potential effects on the environment in relation to their specific issues and how they will be mitigated."

- 4.4 (N.B. "above specialist reports" refers to planning statement, drawings, design statement, landscape concept plan, sustainability statement, noise assessment, ecological assessment, transport, drainage, construction, flood risk assessment.)
- 4.5 In preparing their screening opinion, East Dunbartonshire Council completed the checklist set out in Annex B of Circular 8/2007 which is used to assist in screening

whether an EIA is required. The Council concluded that the proposed development would not have any significant impacts in relation to any of the screening criteria albeit it was noted that the development is adjacent to Gavin's Mill (a Grade 2 listed building) and Allander Water. Overall, it was concluded that:

"the likely adverse effects generated by the operation of the proposed development will not be significantly different to the existing setting. The main reasons being the location and characteristics of development are in accordance with the designated Town Centre.

In order to determine whether an EIA should have been 4.6 submitted with the application or not, it is necessary to address the question of whether the development is likely to have significant effects on the environment. LUC have therefore undertaken a review of proposal in accordance with the checklist set out in Annex B of Circular 8/2007. Contrary to the opinion of the Council's Planning Officer, LUC are of the view that the proposed development could have a potential impact on the environment in relation to the following criteria set out in the EIA screening checklist. Please note that the criteria outlined in the table below relate to issues covered in the townscape / visual impact appraisal, WLM may want to expand this list to cover other aspects of the scheme that they believe will have a significant impact – e.g. the impact on the commercial livelihood of the town centre.

Summary of LUC review of Screening Checklist

Reference to screening criteria set out in Annex B of Circular 8/2007	Officer comments as set out in note TP/ED/09/0638	LUC Comments
Ia) Will the development be out of scale with the existing environment?	No, existing town centre	LUC consider the proposed development to be out of scale with the typical town centre buildings and urban blocks of Milngavie. It also has a considerably larger footprint area than the existing store. It is also a taller building in an elevated highly visible location which increases its impact.
2 a) Are there any existing landuses on or around the location which could be affected by the development e.g. homes, other private property, commerce, recreation, etc	No	Although outwith the remit of this study, it is considered probable that the proposed development would be detrimental to the other commercial businesses within Milngavie town centre.
2c) Are there any areas on or around the location which are protected under international or national or local legislation for their ecological, landscape, cultural or other value which could be affected by the development?	No	The proposed development is immediately adjacent to the Milngavie Town Centre Conservation Area and contains a section of the Allander Water. Gavin's Mill B Listed building is within the site and the Railway Station B Listed building is within 80metres of the proposed store. The course of the Allander Water is part of a Major Wildlife corridor as designated by East Dunbartonshire Council.
2 c) Is the development in a location which is likely to be highly visible to many people?	No	The scale and location of the proposed development would be highly visible to all users of Woodburn Way and from many residential properties in and around Milngavie town centre. It would also be experienced by people following the Allander Way, and possibly by those visiting Milngavie to walk the West Highland Way.
2 c) Are there any features of historic or cultural importance on or around the location which could be affected?	Yes the site is adjacent to Gavin's Mill	Gavin's Mill B listed building as discussed above.

- 4.7 In conclusion it is felt that due to the location, scale and massing of the retail store component of the proposed development and the relationship to the existing town centre, the project could have a significant impact on the townscape of the area.
- 4.8 As outlined above, the planning application for the proposed development did include a number of specialist reports.

 None of these reports however included an assessment of the potential impacts of the scheme on the townscape or visual amenity. It is therefore concluded that insufficient information was submitted with the application and that an Environmental Impact Assessment should have been undertaken.
- 4.9 In accordance with the EIA regulations, WLM is within their rights to submit a request to the DPEA for the Scottish Ministers to make a screening direction on whether an EIA should have been carried out. We have been informed by planning lawyers that this request can be made prior to the submission of information to the reporter as part of the appeal. As part of this request, it is important that clear information is provided on why WLM believe that an EIA is required, i.e. the reasons why the scheme has the potential to lead to significant environmental impacts (ref above table). If Scottish Ministers direct that EIA is required, the appeal will not be determined (except by refusing permission) until the appellant submits an Environmental Statement.

It should be noted however that under regulation 9 of the EIA regs, on receipt of an appeal made under section 47 of the 1997 Act which is not accompanied by an Environmental Statement, Scottish Ministers will consider whether the proposed development is a Schedule I development or a Schedule 2 development for which EIA is required. Where necessary, they should automatically make a screening direction. It is was however suggested by the planning lawyer we contacted that it may be in the interests of WLM to highlight the need for a screening direction to the Scottish Ministers to ensure that due consideration is given to the need for an EIA.