

Our Ref: S13/21  
Your Ref: 09/0456/PP



**Central Scotland Conservancy**

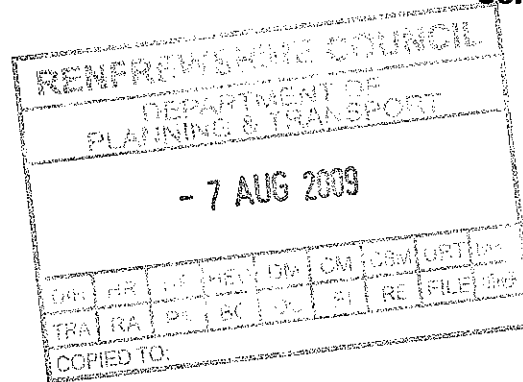
Bothwell House  
Hamilton Business Park  
Caird Park  
Hamilton  
ML3 0QA

Tel: 01698 368530  
Fax: 01698 368531

Conservator  
Keith D Wishart

GC Russell  
Head of Planning  
Renfrewshire Council  
South Building  
Cotton Street  
PAISLEY  
PA1 1LL

6<sup>th</sup> August 2009



Dear Mr Russell

**RE. THE ENVIRONMENTAL IMPACT ASSESSMENT (SCOTLAND)  
REGULATIONS 1999  
CONSULTATION ON PLANNING APPLICATION ACCOMPANIED BY AN  
ENVIRONMENTAL STATEMENT  
Construction of a landfill facility at western edge (east of Turningshaw Road)  
of the former Royal Ordnance Factory site, Station Road, Bishopton  
Planning Application Reference: 09/0456/PP**

Thank you for the opportunity to comment on the above.

It is good to note that no trees or woodland cover will be lost as a result of this planning application. I have a few additional comments to make further to our previous correspondence dated 10/8/06, 11/12/06, 10/10/08 and 22/10/08 copies of which are enclosed for your information. These are particularly relevant to the wider Bishopton ROF development area than specific to this application, however they should be considered and addressed as appropriate.

FCS acts as the Scottish Government's Forestry Directorate. It has a statutory duty to promote sustainable forestry in Scotland, endeavouring to achieve a balance between environmental, social and economic sustainability.

An issue of concern to FCS would be the potential effects the wider Bishopton development proposal may have on the woodlands and specifically the consequences that tree felling/deforestation would have on the ecology and landscape of the area and environs. From our records it is clear that a number of woodlands within this area have been identified as Ancient and/or Semi-natural in character. It is unclear how this proposal may impact on these woodland areas given their fragmented nature and location. National Forestry Policy includes a presumption against clearance of any woodland for conversion to other land uses, and in particular seeks to maintain the special interest of ancient and semi-natural woodland.

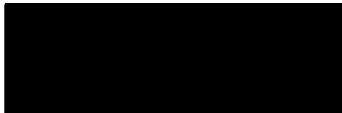
The fifth paragraph is of particular relevance:



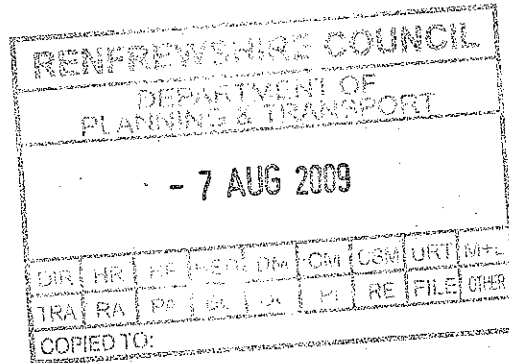
"Internationally there is now a strong presumption against deforestation (which accounts for 18% of the world's greenhouse gas emissions). Reflecting this, Scottish Ministers have now approved a **Policy on Control of Woodland Removal**, which seeks to protect the existing forest resource in Scotland and supports woodland removal only where it would achieve significant and clearly defined additional public benefits. In some cases, including those associated with the development, a proposal for compensatory planting may form part of this balance".

FCS would welcome further opportunities to contribute towards future consultation with this and other development proposals in the wider Bishopton ROF development area.

Yours sincerely



Tommy McGrory  
Woodland Officer



GC Russell  
Head of Planning  
Renfrewshire Council  
South Building  
Cotton Street  
PAISLEY  
PA1 1LL

22nd October 2008

Dear Mr Russell

**RE. The Environmental Impact Assessment (Scotland) Regulations 1999 planning application accompanied by an Environmental Statement  
Redevelopment of Royal Ordnance Factory, Bishopton, Outline Planning  
Application reference: 06/0602/PP**

Thank you for the opportunity to comment on the above. Further to our letter dated 10<sup>th</sup> October 2008 we wish to make a number of recommendations. We focus our comments on the Community Woodland Park Management Strategy however we also make comment on issues which are relevant to the outline application more widely.

We **welcome the development of the woodland strategy** and see it as an important document in ensuring the establishment of a high quality woodland which realises its potential in the redevelopment of Bishopton. We emphasise however the importance of ensuring that woodland is addressed and integrated throughout the overall development proposals. We feel it is only in this way that its potential in the regeneration process will be fully realised.

Broadly, we **strongly recommend that the woodland is seen as a key resource at the heart of the regeneration process for Bishopton**. We feel the woodland strategy and the wider integration of woodland in the redevelopment plans should **more strongly reflect the 2006 Scottish Forestry Strategy objectives** and issues set out in other relevant national and regional strategies. As such we make the following specific comments on the woodland strategy (with reference to the broader outline application where relevant):

1. P. 3. 1.10 i) Adjust this point so as to reflect the broad role of the woodland park in the social, economic and environmental regeneration of the area.
2. P. 3. v) The park and wider development area should be designed and managed to ensure they maximise the opportunity to enhance or create Integrated Habitat Networks as identified within the recent study on the subject by Glasgow Clyde Valley Green Network Partnership. This might include addressing hedgerow and watercourse management within the park and adjoining areas.

3. P. 8. v) Waterside planting. Trees can form important components of sustainable urban drainage systems by helping reduce and delay run-off thus reducing the risk and severity of flooding. We ask that the potential role of woodland in flood mitigation be taken into account when considering watercourse management within the woodland park and wider development area.
4. P. 11. 3.8 Scottish Forestry Strategy (2000) has been superseded by Scottish Forestry Strategy (2006). The latter identifies 3 key outcomes relating to promoting 1) public health and well-being, 2) innovative business, 3) a high quality, robust and adaptable environment. Objectives under these outcomes are to:
  - Assist community participation;
  - Enhance opportunities for health and enjoyment;
  - Contribute to growth in learning and skills development;
  - More efficient timber supply chain
  - Develop markets for forest products
  - Facilitate rural business diversification
  - Increase contribution of forestry to tourism
  - Tackle climate change;
  - Contribute to soil, air and water quality;
  - Contribute to landscape quality;
  - Protect and promote historic environment and cultural heritage;
  - Protect and enhance biodiversity.

The WIAT Programme 2005-2008 has now be superseded by WIAT 2008-2011. It aims to ensure:

- A greater proportion of people living in towns and cities reach recommended daily physical activity levels
- More people living in towns and cities feel an increased level of satisfaction with the quality of their local environment
- A more equitable distribution of high quality green infrastructure
- Management of woodland and other green infrastructure will be secure in the long-term

We strongly recommend that the Scottish Forestry Strategy 2006 and WIAT 2008-11 be scoped to assess the potential for the woodland park strategy and wider outline application to more fully reflect their objectives and desired outcomes.

5. P. 14. 4.1 and P. 15 5.1 Following on from the above point, we suggest the vision and aims for the woodland park are more strongly linked to strategic issues identified in documents such as Glasgow Clyde Valley Joint Structure Plan and the 2006 Scottish Forestry Strategy. As such they should reflect the broad regenerative potential of the woodland park in terms of contributing to quality of life and sustainable place-making. The importance of maximising opportunities for public access for a broad range of user groups should also be highlighted. In relation to this last point we would stress that the relevance of the needs of a range of diversity groups other than disabled people should also be considered in the woodland strategy.
6. P. 18. 7.5 This should refer to the importance of maximising access with educational and health establishments. It should also stress the importance of

ensuring the woodland park is developed so that it complements and supports existing greenspaces within the surrounding area.

7. P. 19. Table 7.1. Potential recreational activities in Zone 4 'Existing Agriculture' do not appear consistent with current access legislation as set out in the Land Reform (Scotland) Act 2003.
8. Figure 1.3 is stated to be indicative, but does not appear to fit with the analysis of the features on the site and the figures of what will remain of woodland within the development area and the park appear to need checking for accuracy.
9. P. 23. 10. We suggest a wider range of organisations and establishments, such as those from the educational and health sector, who will play a role in helping the woodland achieve its potential in the regeneration of the area are referred to here.

We also stress again our comments made to the outline planning application in our letter dated 10 August 2006 (enclosed for your reference).

Please do not hesitate to contact me if you wish to discuss these comments further.

Yours sincerely

Suzanne Martin  
Development Officer



## Forestry Commission Scotland

Our Ref: S13/21

Your Ref: 06/1065/PP

10<sup>th</sup> October 2008

Mr G. Russell  
Head of Planning  
Department of Planning and Transport  
Renfrewshire Council HQ  
South Building  
Cotton Street  
Paisley  
PA1 1LL

Central Scotland Conservancy  
Bothwell House  
Hamilton Business Park  
Caird Park  
Hamilton  
ML3 0QA

keith.wishart@forestry.gsi.gov.uk  
Tel: 01698 368530  
Fax: 01698 368531

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Conservator  
Keith Wishart

Dear Mr Russell

**THE ENVIRONMENTAL IMPACT ASSESSMENT (SCOTLAND) REGULATIONS 1999 PLANNING APPLICATION ACCOMPANIED BY AN ENVIRONMENTAL STATEMENT  
CONSTRUCTION OF A MOTORWAY JUNCTION ON LAND AT INTERSECTION OF M8  
MOTORWAY/A8 GREENOCK ROAD, SOUTH OF CRAIGMUIR FARM AND EAST OF BISHOPTON  
PLANNING APPLICATION REFERENCE: 06/1065/PP**

Thank you for the opportunity to comment on the amended planning application for a proposed new motorway junction at the intersection of M8/A8 Greenock Road.

Forestry Commission Scotland (FCS) have no further comments to make following our original response dated 11<sup>th</sup> December 2006 a copy of which I have attached for your information.

Yours sincerely

**Keith Wishart**  
Conservator





## Forestry Commission Scotland

Our Ref: S13/21

Your Ref: 06/1154/PP

11 December 2006

Mr G. Russell  
Head of Planning  
Department of Planning and Transport  
Renfrewshire Council HQ  
South Building  
Cotton Street  
Paisley  
PA1 1LL

Central Scotland Conservancy  
Bothwell House  
Hamilton Business Park  
Caird Park  
Hamilton  
ML3 0QA

keith.wishart@forestry.gsi.gov.uk  
Tel: 01698 368530  
Fax: 01698 368531

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Conservator  
Keith Wishart

Dear Mr Russell

### CONSULTATION ON CONSTRUCTION OF LANDFILL FACILITY ON ROYAL ORDNANCE SITE, BISHOPTON PLANNING APPLICATION REFERENCE: 06/1154/PP

Thank you for the opportunity to comment on the planning application for a proposed landfill facility on the Royal Ordnance Site, Bishopton. Forestry Commission Scotland (FCS) comments will concentrate on any impacts of the development on existing woodland and any proposed mitigation, remediation measures.

#### Comments:

1. The scope of the works associated with the proposed development does not appear to have a significant impact on existing woodland, therefore, Forestry Commission Scotland has no objection to the proposal on those grounds;
2. However, we **strongly recommend** that the landscape proposals, post-landfill, relating to the establishment of woodland meet the **sustainable woodland management standards stated in the UK Forestry Standard (2004)**. The design and creation of these woodlands should refer to the guidance provided in Forestry Research Best Practice Guidance for Land Regeneration and Forestry Commission Bulletin 110: Reclaiming Disturbed Land for Forestry; and
3. We also recommend that management and establishment of woodland and other habitats should contribute where possible towards the protection, enhancement and expansion of the Glasgow and



the Clyde Valley Green Network - outlined in the Alteration to the Glasgow and the Clyde Valley Structure Plan (2005).

Please contact me if you would like to discuss these comments further.

Yours sincerely

**Keith Wishart**  
**Conservator**



## Forestry Commission Scotland

Our Ref: S13/21

Your Ref: 06/0602/PP

10 August 2006

Mr G. Russell  
Head of Planning  
Department of Planning and Transport  
Renfrewshire Council HQ  
South Building  
Cotton Street  
Paisley  
PA1 1LL

Central Scotland Conservancy  
Bothwell House  
Hamilton Business Park  
Caird Park  
Hamilton  
ML3 0QA

keith.wishart@forestry.gsi.gov.uk  
Tel: 01698 368530  
Fax: 01698 368531

Conservator  
Keith Wishart

Dear Mr Russell

### **CONSULTATION ON OUTLINE PLANNING APPLICATION: REDEVELOPMENT OF ROYAL ORDNANCE FACTORY, BISHOPTON 06/0602/PP**

Thank you for the opportunity to comment on the outline planning application for the redevelopment of the Royal Ordnance Factory, Bishopton. Central Scotland Conservancy, carries out the regulatory and grant support functions, for the Forestry Commission Scotland (FCS) across central Scotland, and provides advice and information on forestry to woodland owners. This is distinct from the role of the Forest Enterprise's Scottish Lowlands Forest District that has responsibility for managing the national forest estate in Central Scotland.

The Conservancy also represents the FCS as a Board member of the Glasgow and the Clyde Valley Green Network Partnership, which has been established to promote and support the implementation of the Green Network Policy proposed in the Consultative Draft Structure Plan (TR5/05).

Our comments will concentrate on the outline proposals for works affecting the existing trees and woodlands on the redevelopment site, the "Community Woodland Management Strategy" and the application's contribution to delivering the Glasgow and the Clyde Valley Forestry and Woodland Framework and Green Network.

#### **Comments:**

1. We are **supportive in principle of the proposal to develop a Community Woodland Park** at the site. However, we would need to reserve our unconditional support until the detailed Strategy and implementation plan have been developed.
2. We would **encourage Renfrewshire Council, if they deemed it appropriate, to clarify the detail of the Community Woodland Management Strategy and associated Action Plan to deliver the Community Woodland Park by legal agreement.** Bishopton is a significant component of the



metropolitan Green Network and therefore, the developer should be encouraged to maximise its contribution for the benefit of local people and the metropolitan area as a whole. The site should become an exemplar for how the Green Network can be delivered as an integral part of regeneration, supporting the principles of the Structure Plan's 'Agenda for Growth';

3. **Our main concern with the outline proposals relates to the level of integration between the different elements of the development** both internally, and the links between the site's green infrastructure and the neighbouring Green Network components and communities. We would be concerned if more attempts weren't made to further integrate the various aspects (e.g. housing, formal greenspace/parks, woodland etc) ensuring that the vision for the site is achieved and the site becomes more than the 'sum of its parts'. There is obviously a need to phase the works due to the scale and challenge facing the developer at this site.

However, detailed master planning should ensure these phases genuinely complement each other. For example, the Community Woodland Park and internal greenspace need to link with each other and with the housing, community facilities and school. Paths and trails from and to the housing should be planned to provide the greatest opportunity for residents to access this resource. The housing should not be designed with its 'back' to the greenspaces/woodland but as an extension of residents' immediate recreational space. The development also provides an opportunity to design and plan the school to take advantage of its proximity to large areas of woodland and greenspace encouraging their use as an educational resource by teachers and pupils, as 'safe routes to school' and helping deliver the Active Schools agenda.

4. Whilst zoning areas using primary management objectives, reflecting the potential biodiversity and ecological benefits, maybe a useful planning tool, we would be cautious of promoting this approach exclusively, as segregating the site strictly into preferred uses can have a divisive affect on the overall management. Where practicable and appropriate the greenspace and woodland should be managed as multi-functional spaces delivering a range of benefits for people and wildlife.
5. We **support the need to undertake a detailed survey of the existing trees and woodlands** on the site and develop management prescriptions that minimise the reduction of mature tree cover. The retention of mature trees and woodlands will ensure the development's landscape character remains as "essentially wooded". Special consideration should be made for the retention of areas of Semi-natural and Ancient Woodland due to their ecological, cultural and historic importance. We would encourage the consultant team, developing the master plan, to refer to the Glasgow and the Clyde Valley Forestry and Woodland Framework for guidance on the general objectives for woodland in the area. Furthermore, the consultants can refer to the Forest Habitat Network Model, that has recently been developed for South west Scotland, which should help identify woodland that can contribute to the wider habitat network (refer to: <http://www.forestresearch.gov.uk/habitatnetworks>).

Given the length of time the development will be delivered over, we would recommend that greater **consideration be given to planting trees as early as possible in areas** more closely associated with the built development. This will help mitigate any detrimental impacts on the landscape, as these trees will have had time to establish and provide better screening; and

6. We strongly recommend that all proposals for the establishment and management of woodlands on the site meets the **sustainable woodland management standards stated in the UK Forestry Standard (2004)**. In addition all woodland operations should be carried out using best practice techniques illustrated in Forestry Commission Guidelines, Guidance Notes and Forestry Practice Guides and Notes (refer to: <http://www.forestry.gov.uk/publications>). A specific example is Forestry Research's (Forestry Commission's Research Agency) series of Best Practice Guidance for Land Regeneration (refer to: <http://www.forestresearch.gov.uk/fr/infid-5suk5s>).

**Conclusion**

As stated in our first comment, Forestry Commission Scotland are supportive, in principle, of the outline proposals for the Community Woodland Park, but encourage the developer to address our concerns and recommendations to ensure this site fulfils its potential to become an exemplar development.

Please contact me if you would like to discuss these comments further.

Yours sincerely

**Keith Wishart**  
**Conservator**