

Our Ref: S13/21  
Your Ref: 09/0527/PP



Aronis  
DXB

## Forestry Commission Scotland

### Central Scotland Conservancy

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Conservator  
Keith D Wishart

<b>RENFREWSHIRE COUNCIL</b>									
DEPARTMENT OF PLANNING & TRANSPORT									
- 7 SEP 2009									
DIR	HR	HP	HED	DM	CM	CSM	URT	M+L	
TRA	RA	PA	BC	DC	PI	RE	FILE	OTHER	
COPIED TO:									

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

2<sup>nd</sup> September 2009

Dear Mr Russell

**RE. THE ENVIRONMENTAL IMPACT ASSESSMENT (SCOTLAND)  
REGULATIONS 1999  
CONSULTATION ON PLANNING APPLICATION ACCOMPANIED BY AN  
ENVIRONMENTAL STATEMENT  
Engineering Operations Comprising Remediation and Bulk Earthworks at  
Royal Ordnance, Station Road, Bishopton**

**Planning Application Reference: 09/0527/PP**

Thank you for the opportunity to comment on the above.

I have reviewed the various documents and whilst it is clear that tree felling/removal appears to be a significant part of the overall remediation of the site it is unclear in area terms what the net loss of woodland (hectares) is likely to be. Given this it would be useful to have these figures (approximate if not definitive) for established woodland to be felled as a result of these proposals in relation to the proposed woodland creation required to mitigate and complement the remediation of the site.

I have a few additional comments to make further to our previous correspondence dated 10/8/06, 11/12/06, 10/10/08, 22/10/08 and 6/8/09. These are particularly relevant to this application and I would ask that due consideration is given as part of the formal consultation process.

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 impacts this application has within the Bishopton development area and wider environs. Specifically the woodlands and the consequences tree felling/deforestation would have on the ecology and landscape of the area. 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*. Existing mature and well established woodland forms a significant proportion of the development area.

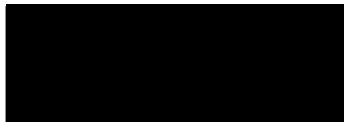


The fifth paragraph is of particular relevance:

"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". The community woodland park element is certainly welcomed but at this stage it is difficult to gauge whether there will be a long-term net loss or indeed gain in woodland cover as a result of any woodland creation proposals as part of this development.

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 McGroary  
Woodland Officer