

# RHU & SHANDON COMMUNITY COUNCIL

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## 21/02614/PNWAY Highlandman's And Torr Forest, Helensburgh, Argyll And Bute Formation of forest track Prior Notification of a Private Way

Applicant: Maaike Felstead, Scottish Woodlands Ltd Sandpiper House Ruthvenfield Road Inveralmond Industrial Estate Perth PH1 2PB. Acting as agents for Mr Edward Latter, Gresham House, Glebe Barn, Great Barrington, Burford, OX18 4US.

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### Description of works on planning application form:

860m of full spec forest road will be formed to FC specification and be constructed of the same material as the existing forest road, using up to 300mm rock for the base, with a running cap formed of harder wearing stone. A further 2,950m of road will be a formation with up to 300mm base rock where required. All base material will be won on site, with capping stone being bought in from nearby.

### Planning Notes:

Argyll and Bute Council state in their acknowledgment of the application on 14 December 2021 that the Council may determine that prior approval is required before these roads may be constructed. *(If you are advised by the Council that prior approval is required for the above proposal, then work cannot begin until the written approval of the Council is given. Should this be the outcome, further information on the Prior Approval process and any action you are required to take will be provided)*

Submission of application date: 8 December 2021.

Determination deadline 5 January 2022.

### Rhu and Shandon Community Council comments:

Rhu and Shandon Community Council have assessed the proposals submitted by Scottish Woodlands Ltd for creating 3.810 km of roads at Letrault and Stuckenduff to enable the forestry plantation and our comments are made below.

In summary the key issues are:

- Watercourse protection
- Ecological habitat protection (including water crossing arrangements and protection of otters)
- Damage to archaeological sites
- Potential damage to native woodlands

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- Increased heavy and large vehicles using roads in Rhu that are classed as dangerous and unsuitable by Argyll and Bute Council and Police Scotland.

It is the view of Rhu and Shandon Community Council that conditions to mitigate the adverse impact of the proposed roads are required in advance of and during development.

These are:

- Secure an alternative main access route to Highlandman's, Torr, Letrault and Stuckenduff forestry operations that avoids Rhu Village. In April 2019, in a letter to the Community Council, Iain Catterwell, the Project Officer of Argyll Transport Group, said "Felling, extraction and haulage of timber from Highlandman's Wood will continue in perpetuity. In the shorter term however, I understand that the Forest Agent is considering alternate forest access/egress and subsequent road haulage options which would alleviate/remove pressure on Pier and Station Roads". The tenant of the land that such a route would cross advises the Community Council that no approach has been made to him on this matter.. The Community Council would like to know why this alternate route was not pursued. It is important that this matter is progressed urgently to ensure public safety.
- Micro -siting of all road routes by an ecologist and archaeologist to ensure sensitive habitats and archaeological sites are avoided.
- Watching briefs by ecologist and archaeologist during construction in sensitive areas.
- Archaeological excavation in advance of development if the archaeological sites on the formed road route cannot be avoided.

## Conclusion:

Rhu and Shandon Community Council object to the proposed road development on the basis that we have already represented the clear view of the community (April 2020 and January 2021) in objecting to this afforestation scheme on the grounds of increased timber related traffic on a road determined to be dangerous by Police Scotland and Argyll and Bute Council Roads Officer. There are numerous other grounds of objection / mitigation suggestions in our previous submissions on this forestry scheme. However, the progress of the scheme as a whole in the long term, and bringing in of capping stone aggregate in the short term, will occasion increased use of unsuitable roads (Station and Pier Roads) in Rhu village by large and heavy vehicles giving rise to safety concerns. Our further concerns on historic and natural environment matters may be addressed by appropriate mitigation.

## Comments

The full specification forest road meets Scottish Forestry requirements.

Little information is provided on the 2.950km of 'New formed forest roads' which are more extensive throughout the plantation area and are also substantial 3.4m wide tracks with stone construction if necessary. These do not appear to be included in the application.

A 3.4m wide road with drainage ditches on either side and general topsoil stripping covers a wider area of approximately 10m or more.

The full specification road crosses 5 watercourses. It is appreciated that the track cannot be moved further uphill into area which is to be left as open ground (peat depths) in the approved woodland planting plan. Culverts measuring 0.30m to 1.50m are identified in the Method Statement but there is no information on bridges. Further information on crossing of water courses is required.

Despite the absence of a wildlife survey as part of the afforestation proposals otters are known to be present in Aldonwick Glen, as well as the smaller burns downslope that will also be crossed by the

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formed roads and ATV tracks. What mitigation measures are in place to protect their habitat and breeding cycles?

The upgrading of the forest roads in preparation for the felling of Highlandman's Wood caused severe silt issues in Rhu Burn and felling operations caused silt and pollution issues in Glennan Burn. The installation of silt traps had to be specifically requested by Rhu and Shandon Community Council to mitigate the pollution. It was disappointing that silt traps were not installed as a matter of course. It is noted that silt traps are advised in the Method Statement, and we hope that they will be installed and maintained. SEPA had occasion to visit the Highlandman's Wood felling operations and advise Scottish Woodlands of a number of improvements and mitigation measures required due to pollution of watercourses, most significantly dumping of brash into watercourses. Based on the operation performance of Scottish Woodlands during Highlandman's Wood felling operations we request that evidence of the installation and maintenance of silt traps to protect the watercourses is provided and a monthly report is provided.

We would expect to see a clear statement that adherence to the various SEPA Good Practice guides will be implemented.

See: <https://www.sepa.org.uk/media/151036/wat-sg-25.pdf> <https://www.sepa.org.uk/media/151049/wat-sg-26.pdf> [https://www.sepa.org.uk/media/150997/wat\\_sg\\_29.pdf](https://www.sepa.org.uk/media/150997/wat_sg_29.pdf) [https://www.sepa.org.uk/media/151010/wat\\_sg\\_44.pdf](https://www.sepa.org.uk/media/151010/wat_sg_44.pdf)

There is no mention of an Ecological Clerk of Works (ECOW) being present to advise on the impact of the road on flushes and sensitive habitats. Good practice for upland development should include an ECOW assessment of all the proposed road routes and flagging off on the ground of sensitive areas that should be avoided by the road and the forestry plantation. The roads should be micro-sited to avoid damaging sensitive ecological habitats.

The inclusion of the **SNH Constructed Tracks in the Scottish Uplands** document in the application is welcome as it infers that the recommendations and guidelines contained in it will be applied. However, the important **SNH Landscape Character Assessment** was completely ignored by Scottish Woodlands, Scottish Forestry and Argyll and Bute Council in granting approval for this afforestation scheme.

## Archaeology

The fully formed road is in close proximity to two identified archaeological sites. These may be damaged or destroyed by the road development.

### **Site 8 lies immediately N of the wayleave**

CHS No: 8

Name:

BNG: NS 2753 8595

NRHE No: HER No: Significance:

Description: A possible circular earthen bank feature located in heathland on a SSW aspect and to the north-west of a stream. A 0.75 m wide gap in the earthen banks is visible in the south-west. The feature measure 5 m in diameter, the banks are circa 1 m wide and 0.5 m high. The interior of the feature is very wet, which continues through the southwest break in the banks downhill in a southwest direction. This is possibly a naturally formed feature and may be the site of a dried-up spring.

### **Site 7 is within the wayleave**

CHS No: 7

Name:

BNG: NS 2745 8611

NRHE No: HER No: Significance:



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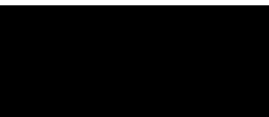
Description: Three stone features were found 5 m above the western banks of a stream on a gentle southern aspect, on a plateau cleared from heather that is flatter than the surrounding landscape. It has clear views down to Gare Loch to the south-west. The features are aligned SW-NE, and their total length is 14.5 m. The features are much overgrown by moss and grass, which makes their full extent and shape unclear. The easternmost and westernmost features seem to be oval in shape, while the central feature forms a C- shape. The westernmost feature measures 4.6 m in length and 4 m in width, the central feature measures 8 m in length and 0.9 m in width, while the easternmost feature measures 6.4 m in length and 3.8 m in width. They all measure circa 0.4 m in height. They might represent the remains of cairns, as suggested by their size, shape and upland location. They are located less than 1 km east of Aldonwick Glen cup marked boulder. Unknown date.

The sheepfold at NS 27041 85302 is a landscape feature and is also on the line of a formed track suggesting it will be damaged / destroyed.

Extract from **7 April 2020 Letrault and Stuckenduff Afforestation Preliminary Comment by Rhu and Shandon Community Council**: *Site CHS07 is described as a level grassy area with three cairns. No explanation is given for the difference in vegetation, grassy areas in upland heath located close to watercourses are often shieling sites (Tom na h'Airigh does mean 'Hill of the Shielings') and the description of the central C shaped stone cairn, along with the topography, suggests it might actually be a burnt mound (usually Bronze Age). Site CHS08 should also be considered as a potential burnt mound. No field boundaries, dykes or tracks are recorded although these exist within the survey area including a major head dyke and infield and outfield boundaries. As these boundary features have not been recorded or assessed for date no mitigation is currently recommended.'*

All archaeological and historic environment features should be avoided. The roads should be micro-sited in order to avoid archaeological features. A professional archaeologist (Archaeological Clerk of Works, ACOW) should be present on site during the road construction following an advance site visit to flag off the archaeological features and micro-site the roads. If the archaeological sites cannot be avoided, they should be subjected to professional archaeological excavation and recording in advance of development.

There is no information on the impact of the new fully formed road on the native woodlands that line Aldonwick Glen. This designated Ancient Woodlands and Nature Conservation Area will already be subjected to damage and degradation by the new forestry plantation. An ATV (All-Terrain Vehicle Track) is also shown crossing riparian native woodland at the S side of the scheme. There is already a track here, will it be followed? Will any native trees be felled to create these new roads and tracks? If so, will there be compensatory planting?



Jean Cook  
Secretary, Rhu & Shandon Community Council

**Copied by**  
**email to** Members of the Rhu & Shandon CC  
Councillor George Freeman  
Councillor Iain Paterson  
Jackie Baillie MSP

**This document was prepared by Fiona Baker** Director at Firat Archaeological Services Ltd  
and Convener of Rhu and Shandon Community Council