

Aberdeenshire Local Development Plan
Woodhill House
Westburn Road
Aberdeen
AB16 5GB



September 26 2010

Dear Sir/Madam,

Re: ABERDEENSHIRE COUNCIL LOCAL DEVELOPMENT PLAN – PROPOSED PLAN 2010

The Scottish Wildlife Trust (SWT)¹ welcomes the opportunity to comment on the Aberdeenshire Council proposed Local development Plan (LDP).

The Scottish Wildlife Trust believes that inappropriately located and badly designed developments can have significant, detrimental impacts on Scotland's biodiversity and on people's quality of life. We believe that the planning and design of new places could and should in the future *enhance* biodiversity, particularly if new developments are designed to improve habitat connectivity and avoid the destruction of valuable biodiversity hotspots (e.g. Local Nature Conservation Sites). To achieve this SWT recommends the application of an ecosystem-based approach² to at least the natural heritage aspects of the planning system.

The Scottish Wildlife Trust is pleased to see that the principles of sustainable development are guiding the report and *have been considered in every policy*. We support Aberdeenshire Council's belief that there are *opportunities to enhance biodiversity in every development* and we welcome the reference to *maintaining and restoring habitat networks*. Such ecological networks allow species to move from their current location and will become increasingly important in the face of climate change.

We believe that our comments, if taken on board in the Local Development Plan, will add value to Aberdeenshire's natural heritage and, at the same time, be beneficial to the people of Aberdeenshire and the local economy.

Specific comments regarding the LDP and Supplementary Guidance are detailed below. We have commented on two specific sites that have been identified for development (Saltire Woods and Cauldhame Plantation). Both sites are ancient woodland (long-established of plantation origin) and benefit the local community because of their high biodiversity value. Destruction of them would be contrary to Aberdeenshire Council's natural heritage supplementary guidance and indeed the principles of sustainable development.

SPECIFIC POINTS

Local Development Plan

Page 12 - Policy 8 Layout, siting and design of new development

There should be reference to new development 'working with the grain of nature' such that the sensitive environmental features of a site are retained in the layout, siting and design of any new development. (This would avoid the common practice of developers working with a 'clean slate' i.e. on a site which has been bulldozed to remove the vestiges of wildlife, which are then reintroduced *after* development)

¹ The Scottish Wildlife Trust's central aim is to advance the conservation of Scotland's biodiversity for the benefit of present and future generations. With over 35,000 members, several hundred of whom are actively involved in conservation activities locally, we are proud to say we are now the largest voluntary body working for all the wildlife of Scotland. The Trust owns or manages 123 wildlife reserves and campaigns at local and national levels to ensure wildlife is protected and enhanced for future generations to enjoy.

² See Hughes J., Brooks S. (2009) Living Landscapes: towards ecosystems-based conservation in Scotland. Scottish Wildlife Trust, Edinburgh

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States: *The Climate Change (Scotland) Act (2009) introduces a requirement for the plan to include policies which say that all developments in the local development plan area must contribute to reducing greenhouse gases. While we can largely deal with this issue using SG LSD 11, the statement in the policy ensures compliance with the legislation.* SGLSD1 and SGLSD2 should be referenced here as greenhouse gas emission reduction can also be achieved by careful masterplanning and through ensuring the layout, siting and design of a new development is not car dependent (e.g. development that is designed to maximise the use of public transport - *transit-orientated development*).

Page 15 – Policy 11 Natural heritage

States: *The UK has signed up to a commitment to stop the reduction of biodiversity by 2012 - the date should be 2010. The commitment has not been met.*

This section should set natural heritage in the context of the Nature Conservation (Scotland) Act 2004, which places a duty on public bodies to further the conservation of biodiversity - *the biodiversity duty*.

Page 18 -24 The proposals maps

With references to sensitive wildlife sites (under Policy 11), all international, national and locally designated site (which includes local nature conservation sites [LNCS]) should be included in the maps and their boundaries clearly marked to ensure they are protected from inappropriate development.

Page 28 Table 6 New housing land – Kincardine and Mearns

The Scottish Wildlife Trust notes that Luthermuir is an area identified for housing - the LDP has identified development of houses on Cauldhame Plantation, a small wooded area at Luthermuir in the Mearns. Cauldhame Plantation is ancient woodland - long established of plantation origin, and supports a very diverse wildlife community including red squirrel (which is a UK priority species) and bat species such as pipistrelle spp. (which is a European protected species). The site also provides connectivity for wildlife to other scattered safe havens for wildlife (i.e. the woodland is part of the local green ecological network).

The Scottish Wildlife Trust strongly recommends that the wooded area is left undisturbed and an alternative site, which would have less negative impacts on local biodiversity, should be identified for developed instead. This would ensure that a sensitive environment is protected (thus allowing Aberdeenshire council to adhere to its biodiversity duty and comply with its own natural heritage supplementary guidance) and would allow the local community to continue to enjoy the wildlife present.

Supplementary Guidance

SG Natural Environment 1 (SGNE1): Protection of nature conservation sites

Section C includes raised bogs - of note, raised bogs are a European protected habitat and they are also a UK priority habitat. As such, they are of more than 'local importance.' Conservation and restoration of raised bogs can also help offset greenhouse gas emissions because an active bog will continue to store and sequester carbon.

Reasoned Justification (page 2)

This section should refer to Nature Conservation (Scotland) Act 2004 which places a duty on all public bodies to further the conservation of biodiversity.

All nature conservation sites should be mapped with their boundaries clearly marked in the LDP and not just listed.

SG Rural Development 2: Wind farms and large wind turbines

The first box states the applicant must demonstrate that: *the proposal will not compromise public health or safety* etc. For clarity and in keeping with SGNE1 and SGNE2, the list should include wording to the effect that *the proposal will not have a significant adverse impact on the environment or notable fauna and flora*.

SG LSD1: Masterplanning

This supplementary guidance should also recognise the importance of community engagement from the outset as part of the masterplanning process. Such engagement would take the form of a 'charrette' as advocated by the Scottish Government in their Scottish Sustainable Communities Initiative.

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SG Safeguarding 3: Protection and conservation of trees and woodland

Point 2 in the first Box does not make sense (in relation to the first sentence) and gives no protection to woodland e.g. *when required, an evaluation of the biodiversity and amenity value of the woodland and habitat, including current and future benefits of the existing woodland, has been undertaken;*

Paragraph 2 (under Reasoned Justification) should recognise that ancient woodland, by its very nature, is not easily recreated by compensatory planting and destruction of ancient woodland should be avoided for this reason.

SG Safeguarding 7: Areas of search for minerals

We note that Saltire Wood, Edzell (no. 69) has been identified in Table 1 as an area of search for minerals. This woodland is ancient woodland (long-established of plantation origin) and contains, *inter alia*, notable wildlife such as red squirrel (UK priority species) and bats (European protected species). For this reason we would like the search area removed from the LDP (i.e. to protect the wildlife therein). This would be in accordance with SGNE2 and section 1 of the Nature Conservation (Scotland) Act 2004.

The Scottish Wildlife Trust would like to be kept informed of the progress of the LDP and we would be grateful for the opportunity to comment further if required.

Yours faithfully,



Dr Maggie Keegan
National Planning Co-ordinator