

The Planning Manager  
Development Planning & Regeneration  
Development and Environment Services  
Orkney Islands Council  
School Place  
Kirkwall  
KW15 1NY

17 June 2011

Dear Sir/Madam,

**Re: ORKNEY LOCAL DEVELOPMENT PLAN - PROPOSED PLAN**

The Scottish Wildlife Trust<sup>1</sup> welcomes the opportunity to comment on the Orkney Local Development Plan (LDP) – proposed plan.

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 too. 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 approach<sup>2</sup> to at least the natural heritage aspects of the planning system.

**Main points**

The Scottish Wildlife Trust is pleased to see that the LDP has embedded the principles of sustainable development and the issue of tackling climate change within each policy. We also welcome the plan's recognition that Orkney's natural heritage is: *a key strength and is a major contributor to the quality of life enjoyed in the County* and that: *the richness of our natural heritage forms an important cornerstone of the local economy, contributing to the high quality associated with local produce, as well as attracting many visitors to the County. It also makes a positive contribution to aesthetic quality of life.* It is also refreshing to see the value of natural heritage included in the *Vision*.

**Specific points**

Local nature conservation sites

The Scottish Wildlife Trust supports the proposed LDP's inclusion of local nature conservation sites (LNCS) (Policy N2) and the mapping of the sites as part of the plan. The importance of LNCS is recognised in Scottish Planning Policy which states:

*International and national designations can be complemented by local designations which protect, enhance and encourage the enjoyment and understanding of locally important landscapes and natural heritage. Local designations should be clearly identified and protected through the development plan.*

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<sup>1</sup> 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.

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



## Protecting Scotland's wildlife for the future

The Scottish Wildlife Trust believes that the creation and maintenance of LNCS systems provides a mechanism for the identification, enhancement and protection of locally important wildlife areas. LNCSs provide important wildlife refuges and act as stepping stones and foundation sites within local ecological networks, linking different habitats and helping to maintain biodiversity. They provide an essential complement to other voluntary and statutory conservation mechanisms, which on their own are inadequate to conserve Scotland's wildlife. As the majority of Scotland's wildlife exists outwith statutory site series, the Scottish Wildlife Trust believes that LNCSs provide a valuable and essential addition to statutory sites and when combined contribute to a broader and more effective means of conserving wildlife in Scotland.

The protection and mapping of LNCS within the LDP also accords with Orkney Council's biodiversity duty under the Nature Conservation (Scotland) Act 2004 which states in Section 1:

*It is the duty of every public body and office-holder, in exercising any functions, to further the conservation of biodiversity so far as is consistent with the proper exercise of those functions.*

### Adopting an ecosystems approach

The Scottish Wildlife Trust supports the inclusion of policy N4: the wider biodiversity interest - such that the impact of a proposed development on increasing habitat fragmentation and isolation of habitat must be considered as part of the planning process.

The Scottish Wildlife Trust believes that having a thriving and biodiverse landscape is the key to Orkney delivering ecosystem goods and services upon which the people and the economy of Orkney depend. As we have stated in our Living Landscapes<sup>2</sup> policy document:

*The conservation of biodiversity is the key to ensuring ecosystem health; quite simply, without thriving biodiversity, ecosystems begin to malfunction and lose significant value.*

*To reverse continuing declines in biodiversity we need to take action not just in specially protected areas for wildlife, but also throughout the wider countryside, at the ecosystem or landscape, scale.*

The recently published UK National Ecosystems Assessment<sup>3</sup> also reiterates our policy:

*All ecological processes are the product of interactions between different groups of organisms and are dependent on there being a range of these present. In this sense, biodiversity – the variety and variability of living organisms – ultimately underpins the functioning of all ecosystems and thereby the delivery of all ecosystem services.*

Whilst the Land Use Strategy<sup>4</sup> which is intended to inform the LDP states:

*We wish to integrate the principles of an ecosystems approach to promote improved decision-making. Our ecosystems provide many services, such as food production, water and flood regulation, carbon capture and recreation. With measures to sustain these services and recognition of their value to our economy and to our health, the Land Use Strategy can help ensure long-term prosperity for Scotland and other communities across the country.*

## Conclusions

The Scottish Wildlife Trust is supportive of the recognition and high priority that the natural environment has been given in the Orkney Local Development Plan which is reflected, *inter alia*, in the inclusion of policies regarding local nature conservation sites and protection of the wider biodiversity interest.

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<sup>3</sup> Published by DEFRA on 3 June 2011 see: <http://www.defra.gov.uk/environment/natural/uknea/>

<sup>4</sup> See: <http://www.scotland.gov.uk/Topics/Environment/Countryside/Landusestrategy>

## Protecting Scotland's wildlife for the future

The Scottish Wildlife Trust is pleased the LDP has recognised the importance of protecting and enhancing Orkney's natural capital which will not only be beneficial to wildlife but will add value to making Orkney a world class destination and a place where people want to live their lives.

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,

A handwritten signature in black ink, appearing to read 'M. Keegan'.

**Dr Maggie Keegan**  
**National Planning Co-ordinator**