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From: [REDACTED]
Sent: 22 May 2018 08:53
To: Claire McArthur
Subject: FW: RSPB Scotland comments on Aberdeen City & Shire MIR
Attachments: Aberdeen City + Shire Stratgeic Dev Plan MIR_RSPB Scotland comments_May18.pdf

From: Weston, Jenny [REDACTED]
Sent: 21 May 2018 10:36
To: [REDACTED]
Subject: RSPB Scotland comments on Aberdeen City & Shire MIR

Please find attached RSPB Scotland's response to the Aberdeen City and shire Main Issues Report.

Best wishes

Jenny Weston
Conservation Officer

rspb.org.uk

Let's give nature a home in Scotland



RSPB Scotland is part of the RSPB, the UK's largest nature conservation charity, inspiring everyone to give nature a home. Together with our partners, we protect threatened birds and wildlife so our towns, coast and countryside will teem with life once again. We play a leading role in BirdLife International, a worldwide partnership of nature conservation organisations.

The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654

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Aberdeen City and Shire Strategic Development Planning Authority,
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21 May 2018

Dear Sir/Madam,

Aberdeen City and Shire Strategic Development Plan - Main Issues Report 2018

Thank you for consulting RSPB Scotland on the Main Issues report for the forthcoming Aberdeen City and Shire Strategic Development Plan. Please find below RSPB Scotland' comments on the questions asked in the consultation document.

Main Issue 7 – Tourism development

Q7 – Do you agree with the Preferred Option that the new plan should take a stronger and more flexible approach to long-term tourist development?

As VisitScotland's Tourism Development Framework states, Scotland's nature and landscapes are highly valued assets, and are the single most important factor in attracting visitors to Scotland. We note that the Framework aims to support growth in the visitor economy by providing greater access to the various protected and designated natural places in Scotland, but also emphasises that the special characteristics of those places must be preserved. We agree that the plan should encourage appropriate tourist development, but it is crucial that such development is carefully located so that it does not result in harm to the natural environment, especially in protected, designated or otherwise ecologically sensitive areas.

Main Issue 8 – Housing land allowances

Q13 – Do you agree that our Preferred Option should allow Local Development Plans to make some further housing allocations?

We have no specific comment on whether it is appropriate to allow LDPs to make some further housing allocations. However, we wish to emphasise that in determining the distribution of housing allocation, the SDP and LDPs should take into account the implications of the location and density of housing developments for the ability of new homes to be zero carbon (bearing in mind the need for all homes to be zero carbon by 2050). Research has shown that higher density housing, and housing located closer to services and where people work and shop, results in lower emissions and has the potential to increase wellbeing. Housing cannot be truly 'low carbon' for example if it is built where people have to commute long journeys by car.

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Patron: Her Majesty the Queen Chairman of Council: Kevin Cox President: Miranda Krestovnikoff
Chairman, Committee for Scotland: Professor Colin Ga braith Director, RSPB Scotland: Anne McCall
Regional Director: Martin Auld

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Q14 - Do you agree that any new greenfield allocations should preferably be under 100 houses in size?

We agree with the requirement on the councils to prioritise brownfield sites and the currently 'constrained' supply before allocating new sites, and agree that any new greenfield allocations should preferably be under 100 houses in size. This will help to ensure efficient use of land and a more compact pattern of development; and reduce the need for new infrastructure.

7. Energy

Carbon Capture and Storage (CCS)

We note that the MIR proposes to maintain support for CCS development at Peterhead. It should be recognised that the Climate Change Plan (which sets out how the Scottish Government intends to meet statutory climate targets to 2032) assumes that CCS will not be commercially deployed during the 2020s therefore is not critical to the national plan for achieving statutory climate targets, however it is still supported by Scottish government policy and in particular the potential for CCS to decarbonise industry should be supported.

We support the proposals that in expanding renewable energy, environmental effects should be avoided and mitigated as far as possible. We suggest that developers should also be required to contribute to a net gain in biodiversity, for example with regard to onshore wind through contributing to strategic habitat enhancement work as proposed in the recently published Scottish Government Onshore Wind Policy Statement (please also see our more general comments below in relation to policy on biodiversity).

Main Issue 12 – Renewable Energy

Q15 – Do you agree with the Preferred Option that the new plan should target generating 5 Gigawatt hours of renewable electricity and seek to diversify non-wind based generation by 2040, along with energy storage?

Regarding energy targets, we believe the figure of '5 Gigawatt hours' to be in error, we assume the intention was to propose a target for 5 GW installed capacity (which is the usual way of expressing renewable energy targets), not electricity generation.

Whilst we are not opposed to setting regional energy targets in principle, such targets should be based on evidence of the carrying capacity of the area for renewable energy without causing significant harm to species and habitats. RSPB carried out peer reviewed spatial analysis of the carrying capacity across the UK for major renewable technologies (including onshore wind, offshore wind and solar energy), which also took into account non-ecological planning and physical constraints, and this analysis can be found here: <http://ww2.rspb.org.uk/our-work/conservation/conservation-projects/details/350939-energy-futures-resource-constraints-and-sensitivity-mapping-for-renewable-energy-in-the-uk>. We found for example that an indicative capacity of onshore wind at low ecological risk in Aberdeenshire was approximately 730 MW based on national data sets, although a regional assessment could provide a more refined picture using more locally available information.

We would be happy to provide more information on the methodology and advise on how this exercise could be undertaken on a regional scale to provide up to date indicative capacity estimates to inform targets. Ambitious renewable energy targets (based on evidence of carrying capacity of the environment) also need to be backed up by commitment to robust assessment of environmental impacts and steering developments to the most appropriate sites.

Whilst it may be possible for a target of 5GW installed capacity to be achieved at low ecological risk, it must be stressed that based on our current understanding of the consented offshore wind sites

(approximately 1.6 GW consented and 0.85 GW in planning), we are very concerned about impacts of these sites on seabirds. We are working closely with developers and Scottish Government to advise on how wind farms may be accommodated within these sensitive locations, however based on the existing consents we are very concerned about anticipated risks of collisions and displacement from feeding grounds of breeding seabirds including puffins, guillemots, razorbills, gannets, kittiwakes, and gulls. In setting any regional targets which assume significant further deployment of offshore wind, it should be considered how cumulative impacts of this scale of development could affect protected and declining seabird species and what policies are required to prevent significant biodiversity loss.

Other Issues not covered in Main Issues Report

Biodiversity

The Nature Conservation (Scotland) Act 2004 places a 'Biodiversity Duty' on public bodies to further the conservation of biodiversity and to have regard to the Scottish Biodiversity Strategy (2004). Our obligations to stop the loss of biodiversity by 2020 are extremely challenging and it is important that the planning system plays its part in helping achieve them by preventing any additional net harm and creating additional habitat and other enhancement to replace that which has already been lost whenever possible. Scottish Planning Policy (paragraph 194) confirms that the planning system should seek benefits for biodiversity from new development where possible, including the restoration of degraded habitats and the avoidance of further fragmentation or isolation of habitats.

The mitigation hierarchy is an approach designed to achieve 'no net loss' (and if possible a 'net gain') in biodiversity, firstly through avoidance of impacts, then if impacts can exceptionally be justified, through mitigation or minimisation of impacts and finally, as a last resort only in very limited circumstances, through habitat restoration or compensation. We consider that the SDP and LDPs should emphasise a requirement to robustly apply this mitigation hierarchy when planning for and considering proposals for all developments. In cases affecting designated nature conservation sites e.g. Special Protection Areas, a more robust legal framework is already in place. Application of the mitigation hierarchy will help to halt cumulative small-scale losses of biodiversity from development and help to achieve no net loss of biodiversity.

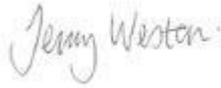
The Scottish Borders Council Local Development Plan (2016) states that any development that could impact on local biodiversity through impacts on habitats and species should (a) aim to avoid fragmentation or isolation of habitats; (b) be sites and designed to minimise adverse impacts on the biodiversity of the site; (c) compensate to ensure no net loss of biodiversity through use of biodiversity offsets as appropriate, and (d) aim to enhance the biodiversity value of the site. We suggest a similar policy approach should apply in Aberdeen City and Shire.

Specifically the Table 1.1 Assessment of affects in this document should also consider other designated sites in addition to the River Dee SAC, as are mapped in Map 4. There are a number of internationally important (Natura 200 sites including Special Protection Areas and Special Areas of Conservation), nationally designated (Sites of Special Scientific Interest) and locally important sites (Local Nature Conservation Sites) which are within the area of concern for the Aberdeen City and Shire Strategic Plan.

The plan should also consider the proposed SPA and MPAs which are within the plan area. Whilst these site have not yet been formally designated, Scottish Planning Policy states that planning authorities should afford the same level of protection to proposed SPAs (i.e. sites which have been approved by Scottish Ministers for formal consultation but which have not yet been designated) as they do to sites which have been designated.

We would welcome policy that allows contributions to be sought from new developments towards offsite biodiversity enhancements (even if they are not directly offsetting impacts on the development site). This would help to strengthen and develop Scotland's National Ecological Network. Falkirk Council Local Development Plan (2015) is an example of a LDP that includes such a policy (Policy GN01 Falkirk Green Network).

Yours sincerely,

A handwritten signature in cursive script that reads "Jenny Weston".

Jenny Weston
Conservation Officer

