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From: [Redacted]
Sent: 22 May 2018 08:58
To: Claire McArthur
Subject: FW: Woodland Trust Scotland response to the Aberdeen City and Shire MIR, May 2018
Attachments: WTS response to Aberdeen SDP MIR May 2018.pdf

From: Arina Nagy-Vizitiu [Redacted]
Sent: 21 May 2018 12:21
To: [Redacted]
Subject: Woodland Trust Scotland response to the Aberdeen City and Shire MIR, May 2018

Dear Sir/Madam

Please see attached Woodland Trust Scotland's response to the Aberdeen City and Shire Main Issues Report 2018 consultation.

Kind regards

Arina

Arina Nagy-Vizitiu
Public Affairs Officer

[Redacted]

[Redacted]

www.woodlandtrust.org.uk



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Stand up for trees

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**Woodland Trust Scotland response to the Aberdeen City and Shire Main Issues Report
2018 consultation, May 2018**

Woodland Trust Scotland (WTS) is pleased to be able to comment on the Aberdeen City and Shire Main Issues Report 2018 and values the opportunity to have its comments taken into account.

The comments that follow are delivered on behalf of the United Kingdom's leading woodland conservation charity. We achieve our purposes through acquiring woodland and sites for woodland regeneration, and wider advocacy of the importance of protecting ancient woodland, enhancing its biodiversity, expanding native woodland cover and increasing public enjoyment. We own over 1,000 sites across the UK, covering approximately 26,000 hectares (ha). In Scotland we own and manage over 60 sites across 10,000 ha, including the 5,000ha Glen Finglas estate. We have three main aims:

- To enable the creation of more native woods and places rich in trees
- To protect native woods, trees and their wildlife for the future
- To inspire everyone to enjoy and value woods and trees.

Main Issue 1 – The Vision

Q1 – Do you agree with the updated Vision, as set out in the Preferred Option?

Yes, we agree with this updated vision and we welcome the addition that Aberdeenshire and City will be recognised for the unique qualities of its environment, and sustainable development which takes into account climate change. To achieve this vision it is important that the SDPA integrates appropriate environmental protection and climate change adaptation and mitigation measures into the new plan. Throughout this representation we will suggest ways in which the SDPA can do this to ensure this vision can be achieved.

Main Issue 4 – Regeneration Priorities

Q4 – Do you agree that the Preferred Option for the new plan should focus on the towns of Banff, Macduff, Fraserburgh and Peterhead for regeneration?

We neither agree nor disagree with this preferred option, however, we would like to take this

opportunity to emphasise that enhancing and developing green infrastructure can support regeneration in these areas. Greenspace and connection to nature are important for high quality of life. As a practical way to help with regeneration of these areas we would suggest increasing native tree cover specifically, through the addition of street trees and hedges, community woodlands, and integrating trees into the development process where new housing is proposed. Such an approach can bring social, environmental and economic benefits. The presence of trees is perceived as indicating a more cared for neighbourhood and is associated with a decreased incidence of crime. Woodland Trust research shows that only 22.1% of people living in Aberdeenshire have access to at least 2ha of woodland within 500m of where they live. Woodland Trust's vision is for a UK rich in woods and trees which can be enjoyed by everyone, therefore we would like to see an increase in the percentage of population who live within walking distance of an accessible area of woodland. As well as helping with regeneration efforts in the focus areas identified, setting a target in the SDP to increase native tree cover would be a firm commitment from the SDPA towards increasing the native tree cover for the whole of Scotland. This would also be in line with Scottish Government targets for woodland creation which have been increased to achieving 15,000ha per year by 2025.

We strongly agree with clause 4.17 on helping to encourage development on brown field land. This is in line with SPP provision '*considering the re-use or re-development of brownfield land before new development takes place on greenfield sites*' and can help protect greenfield and other land of high nature conservation value from development.

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 tourism development?

When developing the tourist industry, a balance must always be sought between environmental protection and social and economic benefits. We agree that the new plan needs to '*recognise that long-term proposals for tourism need to be dealt with sympathetically through the planning system*'. A high quality environment is very important for tourism, and as outlined in the proposed vision '*Aberdeenshire and City will be recognised for the unique qualities of its environment*'. For this to happen it is vital that the current natural environment is protected and enhanced, and no further development is allocated

directly adjacent to or on high value for nature areas, such as ancient woodland.

Q8 – Is there anything more the planning system should do to support sustainable economic growth?

Yes, the planning system could safeguard and enhance the natural environment at a stronger level than it is now. According to the SPP definition of sustainable economic growth ‘ensuring quality of life for the next generation’ is part of this concept. Environmental protection is a large part of this and growth at the expense of nature is not a business scenario for the future.

Main Issue 11 – Housing Land Allowances

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

We neither agree nor disagree with this preferred option, however, we want this strategic plan to ensure that in making any site allocations, these are not allocated on or adjacent to any ancient woodland sites. The current SDP, adopted in March 2014, includes the following provision in clause 4.7 *‘All new developments must be designed and built to use resources more efficiently and be located in places where they have as little an effect on the environment as possible.’* WTS would like to see this provision taken forward to the next SDP to guide any further housing and other development allocations in places where they have a minimal impact on the environment. To strengthen this provision, we would like to also see the following in the next SDP:

‘Developments likely to cause disturbance should be located away from ancient or semi-natural woodland, particularly those likely to modify local hydrological function. Where development is located near to ancient or highly bio-diverse woodland, buffer zones should be retained to reduce the distance that disturbance penetrates. If possible, access to the woodland should be limited or managed.’ This strategic provision can then be respected by both council areas and help ensure that we see no further loss of ancient woodland, a precious and irreplaceable habitat.

Q14 – Do you agree that any new greenfield allocations should preferably be under 100

houses in size?

Greenfield should be protected and enhanced as much as possible. With increasing housing targets all across Scotland, greenfield land is under pressure from development and this could mean that there could be a risk to see a significant decrease in this type of land. We believe that greenfield has tremendous potential for delivering a wide range of vital benefits such as better habitat connectivity, spaces for woodland creation, wildlife habitats, space for people and clean air. WTS would not support any development likely to cause disturbance on greenfield land which has ancient woodland areas, however, in a situation where development is being considered on greenfield, the impact on greenfield would be less negative if smaller housing allocations were considered, as the SDPA proposes in this section. In addition, the SDPA can include provisions for the greenfield areas to be integrated early into the development process, and to include landscaping features such as native trees. Brownfield land of no natural and cultural heritage should be prioritised and exhausted before any new greenfield land is allocated for development, and developers encouraged to develop brownfield sites. This would also be in line with provisions in SPP clause 40: *'considering the re-use or re-development of brownfield land before new development takes place on greenfield sites.'*

Section 9 – Transport

Q16 – Do you agree that the next Strategic Development Plan should continue to identify regionally significant long-term transport projects and cumulative transport interventions?

We do not agree nor disagree with this, but would like to ask that any future transport project routes are located away from any ancient woodland sites. WTS would be delighted to work with the SDPA to help identify any ancient woodland sites which could be at risk from further development. Further to this, to ensure that no development proposals are allocated on land directly adjacent to or on ancient woodland sites which are very important for biodiversity, we recommend that current SDP objectives in the 'Quality of the environment' section are taken forward to the new SDP. We are disappointed with the following section in the 'How to meet the targets' section: *'Both councils will take account of biodiversity, wildlife habitats, landscape, green networks and other sensitive areas in identifying land for*

development, preparing masterplans and assessing development proposals.' According to SPP clause 195 *'Planning authorities, and all public bodies, have a duty under the Nature Conservation (Scotland) Act 2004 to further the conservation of biodiversity. This duty must be reflected in development plans and development management decisions. They also have a duty under the Water Environment and Water Services (Scotland) Act 2003 to protect and improve Scotland's water environment. The Scottish Government expects public bodies to apply the Principles for Sustainable Land Use, as set out in the Land Use Strategy, when taking significant decisions affecting the use of land.'* Wording currently used in the SDP 'will take account' does not accurately reflect the aforementioned clause and we would like to see this strengthened with clearer wording such as **'Both councils will protect and enhance biodiversity, wildlife habitats, landscape, green networks and other sensitive areas in identifying land for development, preparing masterplans and assessing development proposals.'**

Contact details:

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