

Proposed Aberdeen City & Shire Strategic Development Plan Representation Form

Please use this form to make comments on the Proposed Aberdeen City & Shire Strategic Development Plan, ensuring that your comments relate to a specific issue in either the Proposed Plan, Proposed Action Programme or Strategic Environmental Assessment Environmental Report. Please include the relevant paragraph(s) and use a separate form for each issue you wish to raise.

The period for representations will run between Monday 8 October - Monday 17 December 2018

Name	██████████
Organisation (optional)	Woodland Trust Scotland
On behalf of (if relevant)	
Address	Studio 3 10 Queensferry St Edinburgh
Postcode	EH2 4PG
Telephone (optional)	
E-mail (optional)	██

What is your preferred method of communication: email

What document are you commenting on?	Proposed Strategic Development Plan	<input checked="" type="checkbox"/>	
	Proposed Action Programme	<input type="checkbox"/>	
	Strategic Environmental Assessment Environmental Report	<input type="checkbox"/>	
Issue		Paragraph(s)	

What would you like to say about the issue?

(if you would like to write more than the box allows then please attach this form to any additional papers)

Woodland Trust Scotland (WTS) welcomes the opportunity to give its views on this consultation. We also provided a response to the Main Issues Report in May 2018 and are very pleased some of our comments were incorporated in the new Proposed Strategic Development Plan (PSDP)

The comments that follow are delivered on behalf of the United Kingdom's leading woodland conservation charity. We have four main aims:

- No further loss of ancient woodland
- Restoring and improving woodland biodiversity
- Increasing new native woodland creation
- Increasing people's understanding and enjoyment of woodland.

We own over 1,000 sites across the UK, covering approximately 26,000 hectares (ha). In Scotland we own and care for around 60 sites covering in excess of 9,500ha which include the 5,000ha Glen Finglas estate and significant urban forestry holdings in Glenrothes and Livingston. The Woodland Trust has 500,000 members and supporters.

What change would you like to see made?

(if you would like to write more than the box allows then please attach this form to any additional papers)

In forms 2,3 and 4 we will provide further comments giving constructive feedback on specific issues and supporting some of the views already stated. Generally, WTS welcomes this PSDP.

Please return the completed form and any additional papers:

- **By Post :**
Aberdeen City and Shire Strategic Development Planning Authority, Woodhill House, Westburn Road, Aberdeen, AB16 5GB
- **By Email :** team@aberdeencityandshire-sdpa.gov.uk

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Please ensure all representations are with us by midnight Monday 17 December 2018.

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Issue	The vision	Paragraph(s)	

What would you like to say about the issue?

(if you would like to write more than the box allows then please attach this form to any additional papers)

We welcome this vision and aims, particularly the mentions to protecting and, where appropriate, enhancing the environment, dealing with climate change, and also sustainable use of natural resources.

What change would you like to see made?

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Issue	Spatial Strategy	Paragraph(s)	3.11, 3.20, 3.26, 3.48

What would you like to say about the issue?

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3. Spatial Strategy Clause 3.11 states that it is important that the two local authorities collaborate on green networks and green infrastructure. We are unsure what is meant by 'appropriate new planting will play an important role.' We would assume that this refers to tree planting, but this should be clarified in the final version of the SDP. Of course, Woodland Trust Scotland wants to see native tree planting specifically mentioned, while at the same time recognising that sustainable commercial forestry also plays an important role.

We welcome the statement that proposals which are not allocated through the local development plans will not be supported.

There are significant areas identified for economic development throughout Aberdeenshire; we are particularly concerned that some of the development can have direct or indirect impacts on ancient woodland present in those areas. WTS would like to see a provision added here to ensure no further loss of ancient woodland. We appreciate that this is just a strategic plan and that it identifies strategic development areas, but we believe that ensuring no further loss of this irreplaceable habitat should be a strategic priority. Ancient woodlands could be identified on maps included in this plan. We welcome that green network opportunities have been mapped, but mapping the woodlands in the strategic development areas can help inform where development should not take place, as well as landscape connectivity policy and action.

In paragraph 3.20 We are pleased that '[...] creating more "liveable" environments to ensure that City Centre living is an attractive choice' and 'Striving to become a technologically advanced and environmentally responsible City' are included as part of the Aberdeen City Centre Masterplan. Native tree planting, with appropriate species where planting is discussed in urban environments, could play an important part in achieving these objectives and we believe that efforts should be made in Aberdeen City to increase the tree canopy around the city to at least 20% (Forest Research and i-Tree Eco recommendation). Currently Aberdeen is at 10% tree canopy cover, according to data from <http://www.urbantreecover.org/>. By comparison, Edinburgh is at 17%, Glasgow 15%, Stirling 20%, Perth 22.2%, Dundee 17.8% and Inverness 21%. Increasing the canopy cover can provide many benefits and contribute to the aims of this SDP and also to the objectives set within the City Centre Masterplan which we identified above.

We welcome the inclusion of '3.48 Increasing tree cover (both community and commercial) can bring significant environmental, economic, social and community benefits, particularly if new planting respects the different functions of the land concerned and its role in a wider green network. There is clear potential to increase tree cover across Aberdeenshire while respecting the competing interests for land. This will contribute to a wider Scottish Government target of increasing tree cover and timber production, and recognising the role of woodland in mitigating climate change.' However, it is not specified how this will be achieved on the ground, at the two local authority levels. We are aware that Aberdeenshire has a Forest and Woodland Strategy; this should be specifically mentioned here.

In clause 3.48 include the wording 'Proposals for forestry planting and woodland creation should be in line with the Aberdeenshire Forest and Woodland Strategy which can be found here.' We

suggest that targets related to this clause are added in the targets section in Chapter 6. Our Resources. WTS favours the creation of native woodlands, as only 4% of Scotland's woodland is native woodland, there is a need to increase and enhance this habitat.

What change would you like to see made?

(if you would like to write more than the box allows then please attach this form to any additional papers)

Paragraph 3.11 - specify what is meant by 'appropriate new planting'. If this is tree planting, this should be specified. Woodland Trust Scotland would like to see native tree planting specifically mentioned.

Include a provision in this section to ensure no further loss of ancient woodland. We appreciate that this is just a strategic plan and that it identifies strategic development areas, but we believe that ensuring no further loss of this irreplaceable habitat should be a strategic priority.

Identify ancient woodlands identified on maps included in this plan, to help inform where development cannot take place. Development on area of ancient woodland is inappropriate; these habitats are irreplaceable and should be protected and enhanced. Include the wording 'Increasing the canopy cover across the city to at least 20%' as an objective, or as part of one of the existing objectives. This data is from a survey produced through i-Tree Eco (this is a methodology which allows to make assessments of canopy cover, economic and environmental benefits of trees in a given area). Such survey data can be used to inform future Forestry, Woodland and Tree strategies for both Aberdeenshire and Aberdeen City. However, from the data available now, it is clear that Aberdeen City is lacking in urban tree cover, which is unfortunate, as this strategic plan points out green infrastructure which includes trees, can help tackle road congestion (this is also recognised in clause 3.26).

In clause 3.48 include the wording 'Proposals for forestry planting and woodland creation should be in line with the Aberdeenshire Forest and Woodland Strategy which can be found here: <https://www.aberdeenshire.gov.uk/planning/plans-and-policies/aberdeenshire-local-development->

plan-2017/ldp-sg-8-the-forest-and-woodland-strategy/.' We suggest that targets related to this clause are added in the targets section in Chapter 6. Our Resources. WTS favours the creation of native woodlands, as only 4% of Scotland's woodland is native woodland, there is a need to increase and enhance this habitat.

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Issue	Chapter 6. Our resources	Paragraph(s)	6.2, 6.8, Targets section and How to meet the targets section

What would you like to say about the issue?

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Chapter 6. Our Resources gives great consideration to biodiversity protection and enhancement, and to the need to adapt to the effects of climate change, and ensure appropriate mitigation measure are put in place.

We also welcome the inclusion of clause '6.2 The important contribution that trees make, whether as natural landscape features, designed landscapes or recreational facilities, cannot be underestimated. Trees provide a valuable ecological resource, as well as a significant contribution to the City Region economy. Trees, forest and woodland cover should be protected and increased where possible. It is particularly important to protect native and semi-natural woodlands and support their restoration.'

In the 'How to meet the targets section', WTS very much welcome the provision that both Councils will protect and enhance biodiversity.

What change would you like to see made?

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In clause 6.8 the wording '[...] we need to make sure there are no possible effects from proposed development [...]', should be changed to '[...] we need to make sure there are no negative effects from proposed development [...]

In the Targets section, in the first target the word 'natural' should be added so that the target says '[...] City Region's historic and natural environment [...]

In the targets section include 'To ensure there will be no further loss of ancient woodland. Development likely to have a negative impact on ancient woodland should be located away from this irreplaceable habitat.'

The important contribution of tree planting is well recognised throughout this SDP, this needs to be specifically listed in the targets section. The Scottish Government has ambitious tree planting targets set to reach 15,000 ha per year by 2025 in a staged approach, so WTS would encourage this SDP to set a target for the whole area, or ensure that a provision is included requiring both local authorities to set tree planting targets through their Local Development Plans. WTS supports native tree planting in particular, and would encourage local authorities to set native woodland creation targets to be at least 40% of the overall target.

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