



31/07/2020

Dear Sir/Madam

The Woodland Trust Scotland appreciates the opportunity to comment on the Aberdeenshire Council's Proposed Local Development Plan 2020.

The Woodland Trust is the UK'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 and 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 manage over 60 sites across 10,000 ha which include the 4,000 ha Glen Finglas estate and significant holdings in Glenrothes and Livingston. We combine the promotion of public access with forestry, farming and conservation of the natural and cultural heritage. The Woodland Trust has 500,000 members and supporters.

The Woodland Trust believes that trees and woodland play a crucial role in place-making given their value to health and wellbeing, recreation, air and water quality, biodiversity, flood protection, climate adaptation and resilience, and amenity value. It is crucial that trees and woodland – as part of a wider approach to strategic green infrastructure – are protected, and their enhancement and expansion planned for from the earliest stage of the planning process to maximise these benefits.

The Woodland Trust considers that any woodland included in Scottish Natural Heritage's Ancient Woodland Inventory (AWI), which is present on historical maps or which exhibits a significant number of ancient woodland indicators can be considered as ancient and long-established and is therefore worthy of further study and is likely to pose a constraint on development.

We believe that ancient woodland is amongst the most precious and biodiverse habitats in the UK and is a finite resource which should be protected. As such, the Woodland Trust aims to prevent the damage, fragmentation and loss of these irreplaceable sites from any form of disruptive development. We achieve our aims 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.

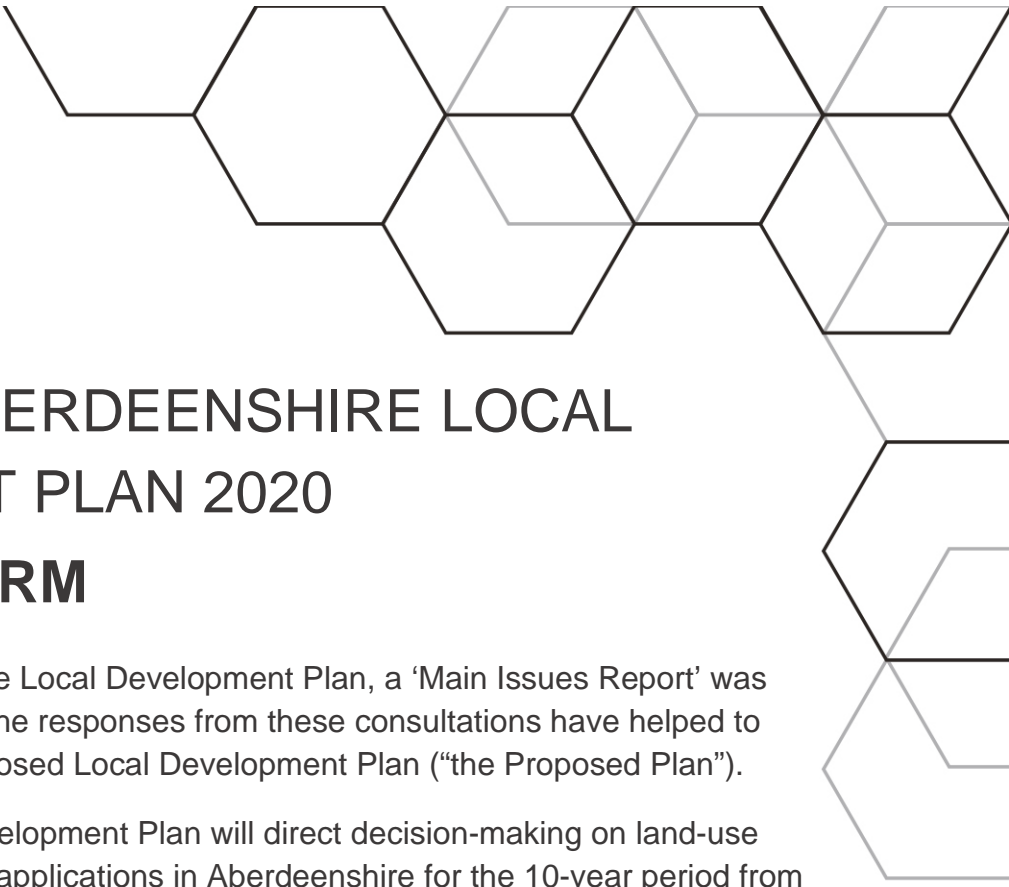
Thank you for the opportunity to comment on this planning application. We hope you find these comments of use.

We hope you find our comments to be of use to you. If you are concerned about any of the comments raised by the Woodland Trust then please do not hesitate to get in contact with us.

Yours sincerely,



Public Affairs Officer – Woodland Trust Scotland



PROPOSED ABERDEENSHIRE LOCAL DEVELOPMENT PLAN 2020 RESPONSE FORM

As part of the production of the Local Development Plan, a ‘Main Issues Report’ was published in January 2019. The responses from these consultations have helped to inform the content of the Proposed Local Development Plan (“the Proposed Plan”).

The Aberdeenshire Local Development Plan will direct decision-making on land-use planning issues and planning applications in Aberdeenshire for the 10-year period from 2021 to 2031. The Proposed Plan was agreed by Aberdeenshire Council in March 2020 as the settled view of the Council. However, the Proposed Plan will be subjected to an independent examination and is now open for public comment.

This is your opportunity to tell us if anything should be changed in the Proposed Plan, and why.

When writing a response to the Proposed Plan it is important to specifically state the modification(s) that you would wish to see to the Plan.

This is the only remaining opportunity to comment on the Proposed Plan. The reasons for any requested changes will be analysed and reported to Scottish Ministers. They will then appoint a person known as a Reporter to conduct a public examination of the Proposed Plan, focusing particularly on any unresolved issues and the changes sought.

Ministers expect representations (or responses) to be concise (no more than 2000 words) and accompanied by limited supporting documents. It is important to ensure that all of the information that you wish to be considered is submitted during this consultation period as there is no further opportunity to provide information, unless specifically asked.

Please email comments to ldp@aberdeenshire.gov.uk or send this form to reach us by 31 July 2020*.

We recommend that you keep a copy of your representation for your own records.

**UPDATE 16 June 2020: Consultation period was extended from 17 July 2020 for a further two-week period.*



ACCESSIBILITY

If you need information from this document in an alternative language or in a Large Print, Easy Read, Braille or BSL, please telephone 01467 536230.

Jeigu pageidaujate šio dokumento kita kalba arba atspausdinto stambiu šriftu, supaprastinta kalba, parašyta Brailio raštu arba britų gestų kalba, prašome skambinti 01467 536230.

Dacă aveți nevoie de informații din acest document într-o altă limbă sau într-un format cu scrisul mare, ușor de citit, tipar pentru nevăzători sau în limbajul semnelor, vă rugăm să telefonați la 01467 536230.

Jeśli potrzebowali będą Państwo informacji z niniejszego dokumentu w innym języku, pisanych dużą czcionką, w wersji łatwej do czytania, w alfabecie Braille'a lub w brytyjskim języku migowym, proszę o telefoniczny kontakt na numer 01467 536230.

Ja jums nepieciešama šai dokumentā sniegtā informācija kādā citā valodā vai lielā drukā, viegli lasāmā tekstā, Braila rakstā vai BSL (britu zīmju valodā), lūdzu, zvaniet uz 01467 536230.

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

Tel: 01467 536230
Email: ldp@aberdeenshire.gov.uk
Web: www.aberdeenshire.gov.uk/ldp
Follow us on Twitter @ShireLDP

If you wish to contact one of the area planning offices, please call 01467 534333 and ask for the relevant planning office or email planning@aberdeenshire.gov.uk.

YOUR COMMENTS

Please provide us with your comments below. We will summarise comments and in our analysis will consider every point that is made. Once we have done this we will write back to you with Aberdeenshire Council's views on the submissions made. We will publish your name as the author of the comment, but will not make your address public.

Modification that you wish to see (please make specific reference to the section of the Proposed Plan you wish to see modified if possible, for example Section 9, paragraph E1.1):

We would like to see more explicit mention at the outset of the ecological crisis. Our [Emergency Tree Plan](#) sets out the importance of an integrated response to the Climate and Nature Emergencies.

In Section 3 - Vision for the Plan and Its Purpose paragraph 3.2 – “The Purpose of a Local Development Plan” – we would like to include the following: change to "contribute to sustainable development for people and nature" in order to address the dual nature of the climate and nature Emergencies.

In Section 4 - The Purpose of the Local Development Plan and Its Outcomes, paragraph 4.3 – “To take on the challenges of sustainable development and climate change”, instead of only mentioning Climate Change, need to mention both the Climate and Nature Emergencies.

In Section 10 - Natural Heritage and Landscape, Policy E3 “Forestry and Woodland” paragraph E3.3 - Change "Promote trees and woodlands to aid Scotland in mitigating and adapting to climate change" to "Promote native trees and woodlands to aid Scotland in mitigating and adapting to climate and nature emergencies". There needs to be an acknowledgment of dual role of trees, especially native trees in the battle against both the nature and climate crisis.

In Section 13 - Climate Change, Policy C2 “Renewable Energy”, paragraph C2.7 – “On-farm Biomass Facilities” – regarding “*Appropriate on-farm biomass energy production facilities will generally be supported. These may be hazardous developments through their impact on air quality. This support is not at the expense of other policies regarding Natural Heritage, Built Heritage and Protecting Resources. In all cases a suitable method of vehicular access must be provided to the satisfaction of Aberdeenshire Council.*” Woodland Trust Scotland believes that making forestry and woodland management economically viable is important for encouraging the rate of woodland creation required to meet government aspirations and targets. A vibrant wood fuel and timber economy, based on local wood production, underpins sustainable management of existing woodland and expansion of the woodland resource. Woodland Trust Scotland supports an increase in **local timber and wood fuel production as a sustainable resource** with credible certification (such as FSC) to reduce the negative environmental impacts of long distance transport. Local wood production contributes to regional and local economies. However, the Woodland Trust Scotland **does not support** the creation of **large scale**

biomass plants, which rely heavily on timber imports, or long transport hauls. Instead we support **small-scale local heat and power biomass plants** which use **locally sourced timber**. We would like to see the above points reflected in Policy C2 “Renewable Energy”.

In Section 13 - Climate Change, Policy C3 – “Carbon Sinks and Stores”

While we agree with the overall statement "We support the development of carbon capture and storage developments, including proposals for woodland that can store carbon for long periods of time" we would like to see this changed to " We support the development of carbon capture and storage developments, including proposals for native woodland (including sustainable production focused plantations) using a mix of native and non-native tree species that can store carbon for long periods of time".

Reason for change:

Trees have an important role in adapting to Climate Change. Climate Change is one of the most serious of the threats that native woodlands face and bold action is required both to reduce carbon emissions and to help nature adapt. We can best help nature by creating sympathetically managed landscapes that allow as many species as possible to adapt and move in response to change. The majority of tree-cover expansion should be delivered with native woods and trees, due to the importance of tackling the nature and climate crises together. However, the UK needs significantly higher levels of all types of tree cover, including sustainable production- focused plantations, which will often be a mix of native and non-native tree species. A core principle for all expansion is that it should not detrimentally affect important local wildlife, and should seek to maximise future wildlife value.

The Woodland Trust Scotland believes that there is an urgent need to implement adaptation strategies to conserve and create landscapes that will be welcoming to wildlife in a time of rapid climate change. The urgency is because of the scale of action required and the timescale needed for habitats to develop to maturity. Woodlands are well placed to act as a key component of a more sympathetic, resilient and receptive landscape for wildlife in the face of climate change.

This requires landscape-scale action. In terms of woodland and wildlife this means:

- Conserving all semi-natural habitats, not just a representative sample of sites such as SSSIs;
- Restoring all woodland and semi-natural habitats planted with non-native conifers;
- Targeting habitat creation in areas where there is greatest potential to put woodland on a sustainable footing, namely in the greatest existing concentrations of Ancient or semi-natural habitats;
- Buffering native and semi-natural habitats from negative effects of intensive land use, extending their core area and reducing the intensity of the land-use practices in-between semi-natural habitats in order to increase the ability of biodiversity to move across landscapes. This in turn means:
 - Reducing air and water pollution;

- Improving soil management;
- Limiting herbicide and pesticide inputs;
- Reducing grazing pressure to deliver more sympathetic management of existing habitats;
- Re-establishing more gentle transitions from one habitat to another particularly at woodland edges and creating more natural green space within urban environments.

Making natural systems more resilient will not only benefit biodiversity. Human societies will also benefit from “environmental services” that these ecosystems provide, such as flood prevention, healthy soils, carbon sinks and future sequestration, water and air quality, and renewable and sustainable resources. Native woodland is our most important terrestrial habitat for wildlife and is crucial to helping wildlife adapt to change. Developing resilient natural systems in the face of climate change requires landscape scale action. Much of this is sound conservation practice which becomes even more relevant in the face of climate change.

Planting native woodlands in urban areas can help settlements adapt to climate change. They help reduce the urban heat island effect, improve air quality and reduce building energy budgets.

In this way landscapes can be created that are more resilient and able to absorb and respond to change, especially climate change.

This is supported by the UK Forestry Standard which sets out the UK Government’s approach to sustainable forestry. It states, [...]Ancient semi-natural woodlands have highest value for biodiversity [...]”

‘Native woodlands, and especially Ancient Woodlands, are the priority habitats of greatest relevance to forestry. They have a very high biodiversity value or potential, and support a large proportion of priority species.’

The [Scottish Forestry Strategy](#) also highlights the fact that climate change and the need to develop renewable sources of energy have become major drivers for extending woodland cover. It also draws attention to the contribution which forestry can make to urban regeneration and the benefits it can offer in terms of biodiversity, amenity, community involvement and better health.

The [National Planning Framework 3](#) recognises that an increase in the woodland cover can contribute to climate change adaptation and mitigation. Targets have now been updated to an annual tree planting target of 15,000 hectares by 2025. (Scottish Government, Climate Change Plan: The Third Report on Policies and Proposals)

PRIVACY NOTICE

LOCAL DEVELOPMENT PLAN PUBLIC COMMENT

The Data Controller of the information being collected is Aberdeenshire Council.

The Data Protection Officer can be contacted at Town House, 34 Low Street, Banff, AB45 1AY.

Email: dataprotection@aberdeenshire.gov.uk

Your information is being collected to use for the following purposes:

- To provide public comment on the Aberdeenshire Local Development Plan. The data on the form will be used to inform Scottish Ministers and individual(s) appointed to examine the Proposed Local Development Plan 2020. It will inform the content of the Aberdeenshire Local Development Plan 2021.

Your information is:

Being collected by Aberdeenshire Council	X
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The Legal Basis for collecting the information is:

Personal Data	
Legal Obligations	X

Where the Legal Basis for processing is either Performance of a Contract or Legal Obligation, please note the following consequences of failure to provide the information:

It is a Statutory Obligation under Section 18 of the Town and Country (Scotland) Act 1997, as amended, for Aberdeenshire Council to prepare and publish a Proposed Local Development plan on which representations must be made to the planning authority within a prescribed period of time. Failure to provide details requested in the 'Your Details' section of this form will result in Aberdeenshire Council being unable to accept your representation.

Your information will be shared with the following recipients or categories of recipient:

Members of the public are being given this final opportunity to comment on the Proposed Aberdeenshire Local Development Plan. The reasons for any changes that the Council receives will be analysed and reported to Scottish Ministers. They will then appoint a person to conduct a public examination of the Proposed Plan, focusing particularly on the unresolved issues raised and the changes sought.

Your name and respondent identification number (provided to you by Aberdeenshire Council on receipt of your

submission) will be published alongside a copy of your completed response on the Proposed Local Development Plan website (contact details and information that is deemed commercially sensitive will not be made available to the public).

In accordance with Regulation 22 of the Town and Country (Development Planning) (Scotland) Regulations 2008 where the appointed person determines that further representations should be made or further information should be provided by any person in connection with the examination of the Proposed Plan the appointed person may by notice request that person to make such further representations or to provide such further information.

Your information will be transferred to or stored in the following countries and the following safeguards are in place:

Not applicable.

The retention period for the data is:

Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue to retain your information for a longer period. A redacted copy of your submission will be retained for 5 years beyond the life of the Local Development Plan 2021, possibly until 2037.

The following automated decision-making, including profiling, will be undertaken:

Not applicable.

Please note that you have the following rights:

- to withdraw consent at any time, where the Legal Basis specified above is Consent;
- to lodge a complaint with the Information Commissioner's Office (after raising the issue with the Data Protection Officer first);
- to request access to your personal data;
- to data portability, where the legal basis specified above is:
 - (i) Consent; or
 - (ii) Performance of a Contract;
- to request rectification or erasure of your personal data, as so far as the legislation permits.

