



**Woodland
Trust Scotland**



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.

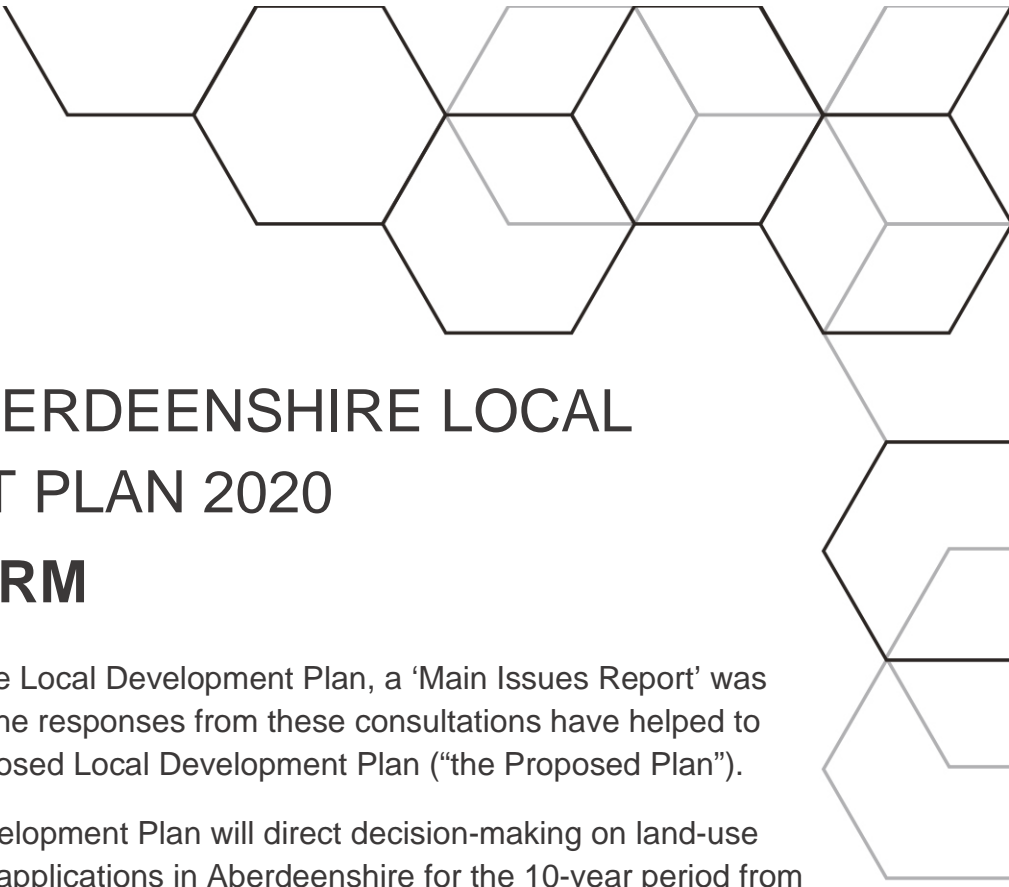
Thank you for the opportunity to comment on this planning application. We hope you find these comments of use.

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.

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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):

The Woodland Trust Scotland would like to see planning authorities encourage the inclusion of trees and woodland in open spaces in new developments. Trees, as part of integrated Green Infrastructures can play an important role in a development such as helping reduce heating bills by keeping the wind away, and tackle noise pollution by absorbing and deflecting sound.

In Section 3 - Vision for the Plan and Its Purpose, paragraph 4.2 – “To promote sustainable mixed communities with the highest standards of design” we would like to see the explicit mention of Green Infrastructure to reflect Sections 4.12 and 4.17 in the NPF3 - *"Well-designed green infrastructure can support regeneration efforts within our towns and cities, and improved attractiveness and environmental performance can act as a catalyst for economic investment. [...] in some cases greening initiatives could be the best permanent solutions for sites where built development is unrealistic for cost or other reasons."*

In Section 3, paragraph 4.4 – “To protect and improve assets and resources” we would like to see clearer wording so that the built heritage is not improved at the expense of the natural environment. This is supported by NPF3 - 4.12 *"Our spatial strategy identifies where development needs to be balanced with a strategic approach to environmental enhancement"* and 4.17 *"Well-designed green infrastructure can support regeneration efforts within our towns and cities, and improved attractiveness and environmental performance can act as a catalyst for economic investment. [...] in some cases greening initiatives could be the best permanent solutions for sites where built development is unrealistic for cost or other reasons."*

In Section 3, paragraph 4.6 – “To promote the creation of green-blue networks within and between settlements”, we would like to see much stronger wording and commit to "no further loss or damage" rather than "but is unable to promote anything other than aspiration."

In Section 7 - Shaping Development in the Countryside, policy R1 - “Special Rural Areas”, paragraph R1.2 needs as strong wording as R1.3 but for woodlands.

In Section 9 - Shaping Places, policy P1 – “Layout, Siting and Design”, paragraph P1.5 needs to add Green Infrastructure as part of definition of amenity with regards to the

qualities of "Safe and Pleasant" and "Well connected". Green infrastructure needs to be consolidated and integrated as part of the 6 principles/qualities of successful places.

In Section 9, policy P2 – “Open Space and Access” paragraph P2.1- We would like to see "adequate public open space" to "adequate public open and green space" and include "should make significant contribution to green-blue networks". This section also needs a clear definition of “open” and “green” space, which should include woodland areas, as well as the inclusion of woods in a list of green spaces that will not be granted planning permission.

In Section 9, paragraph P2.2, we would like to see "40% good quality open space" changed to "40% good quality open space, including 30% increase in native tree canopy cover". Explicit targets help ensure that good intentions are not ‘negotiated down’ during the development process. Our [Emergency Tree Plan](#) calls for Local Authorities to adopt canopy cover targets of at least 30% across all new developments.

In Section 9, paragraph P2.4 we would like to see "temporary" removed from the provision for green-blue networks. Scotland’s definition of sustainable development is *“development which secures a balance of social, economic, and environmental well-being in the impact of activities and decisions; and which seeks to meet the needs of the present without compromising the ability of future generations to meet their own needs.”* The national planning system is about far more than the promotion of economic development.

In Section 9, paragraph P2.6 we would like to see the addition of "with a provision of active community led management plans" to ensure community involvement. The Woodland Trust Scotland would like to see all local authorities set ambitious targets for woodland creation and aspire towards Woodland Trust Scotland’s [Woodland Access Standard](#). This should be clearly stated and backed up by policy in the Local Development Plan.

In Section 10 Natural Heritage and Landscape - Policy E1 “Natural Heritage”, paragraph E1.9 we are happy with this clear commitment against fragmentation. However, the Woodland Trust Scotland would welcome the acknowledgement that the loss of even individual trees and small woods, albeit gradually, has a high impact on natural heritage and biodiversity. Incremental woodland habitat fragmentation is a common issue across Scotland. We would like to see Aberdeenshire Council not only prevent further fragmentation but should also seek ways to reverse the fragmentation of habitats.

In Section 10, paragraph E1.10 - we would like to see "Policy P1 also says that all developments should identify measures that will be taken to enhance biodiversity in proportion to the potential opportunities available and the scale of the development" changed to "...developments should identify measures that will be taken to enhance biodiversity (including woodlands) in proportion to the potential opportunities available and the scale of the development. The inclusion of “Woodland” in any part of the plan that refers to biodiversity is essential.

In Section 10, Policy E3 "Forestry and Woodland" paragraph E3.1 needs to specify "native and semi-natural woodland" to reflect and recognise the importance of Ancient Woodland, Ancient trees, veteran trees, other trees of special interest and Planted Ancient Woodland Sites, including the urgent requirement to ensure they are protected from development. We would also like to see "continue to protect and enhance" changed to "be protected and enhanced" to reinforce the commitment to provide active support to the protection and enhancement of Green Infrastructure.

Section 11 The Historic Environment – Overall, we would like to see similar wording used for this section put in place for the whole of section 10, specifically for Policy E3, especially the inclusion of "ensure that [green infrastructure and woodlands] understanding and enjoyment, as well as its benefits, are secured for present and future generations."

Within Section 12 Protecting resources, Policy PR1 "Protecting Important Resources", paragraph PR1.6 "Development will not normally be permitted on any area of open space, including outdoor sports facilities and buffer strips along watercourses, unless the new use is ancillary to the use as open space." - we would like to see a clear definition of "open" and "green" space, which should include woodland areas, as well as the inclusion of woods in a list of green spaces that will not be granted planning permission.

Reason for change:

The Woodland Trust Scotland would like to see in the Local Development Plan:

- Give clear support for the role that native woodland can play in delivering green infrastructure to enhance local neighbourhoods.
- Use the NWSS to select appropriate sites for green networks, maximising opportunities for preventing further fragmentation, and for “connecting up” smaller pockets of woodland.

The National Planning Framework 3 for Scotland clause 4.17 states “*Well-designed green infrastructure can support regeneration efforts within our towns and cities, and improved attractiveness and environmental performance can act as a catalyst for economic investment. Temporary uses for vacant and derelict land, for example for community growing or supporting biodiversity, can also help to attract investment in specific sites or wider areas. Whilst re-use of vacant land remains a priority, in some cases greening initiatives could be the best permanent solutions for sites where built development is unrealistic for cost or other reasons.*”

Woodland Trust Scotland would like to see increasing recognition of woodland as an especially valuable kind of green space in green infrastructure strategies. Green infrastructure means the network of natural environmental components and green spaces that lie within and between cities, towns and villages. It includes trees, hedges, copses, shelter belts, open spaces, parks, playing fields, gardens, avenues, allotments, and so on. Such green networks serve many purposes, economic, social and environmental.

Developing a green network might involve the provision of paths or the creation of areas of open space, so that people have more opportunity to get out and about, which can improve their health and wellbeing. Many of these actions will also help to improve the economic status of an area, by making it a more attractive place to live and work.

Some of the activities involved in developing a green network will also reduce habitat fragmentation, so a green network is likely to be delivering a broader range of benefits for both people and wildlife.

The [Scottish Forestry Strategy](#) contains a commitment to expanding and improving the quality of woodlands around settlements to provide an improved landscape setting and widen recreational opportunities. Local authorities play an important role in promoting open space networks, facilitating countryside access and developing core path networks.

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.

