

29th July 2020

RESPONSE TO THE
ABERDEENSHIRE PROPOSED LOCAL DEVELOPMENT PLAN 2020

Dear Sir / Madam,

I am writing about the proposal to include the field behind my house in Echt, OP1, in the Local Development Plan, and grant permission for 25 new houses to be built there.

I do NOT think this field should be included in the Local Development Plan and I ask that it be removed.

 invited the young people of Echt to consider the proposed LDP and to participate in the LDP consultation. I understand from her that school children in Kemnay and Fraserburgh have been consulted, but no one has consulted us in Echt. Since the plans will directly affect us, I am now responding.

I have viewed your online home school lesson materials and found these very interesting and helpful. I now understand the role of a town planner better and some of the issues to be considered when making decisions about planning new houses.

<http://publications.aberdeenshire.gov.uk/dataset/3250b482-be48-4f18-bffe-5fdfed07bde3/resource/b8fce6b3-a356-4b2e-9523-34b82aa9e108/download/ldp-2020-interactive-activity---primary-schools.pdf>

I thought about the potential good and bad outcomes of 25 new houses on this site in Echt and found that the bad outcomes far outweigh the good. I have included a photo of my work. (See end of letter).

I ask that OP1, Echt, be removed from the proposed LDP for the following reasons:

1. Loss of Habitat for 38 Vulnerable Species: I am very concerned about the loss of habitat for many species of wildlife. This field is different from the surrounding fields because it is not used for grazing animals or growing crops. This allows, for example, skylarks to nest undisturbed on the ground here, rosebay willowherb to grow wild which feeds the caterpillars of the wonderful Elephant Hawkmoth, white and red clover to grow abundantly which allows many insects including bees to feed on the nectar and pollen.

I have made my own 'Ecological Survey' of the field and my back garden which joins onto this field, from my personal records. I identified **219 species**. I attach a PDF copy of this.

In total **38 species** on my survey are endangered or vulnerable and in need of conservation efforts. It is wonderful that we have such a large number of these special species here. We have a responsibility to protect this habitat and not endanger it. Many of these species cannot simply move to another field because the neighbouring fields are cultivated and grazed. Skylarks, for

example, would be disturbed if they try to nest in a cultivated field, and meadow vegetation would not be available for moth caterpillars to feed on.

Of the bird species, 6 (**Skylark, Yellowhammer, Starling, Tree Sparrow, House Sparrow, Song Thrush**) are classified as “Red” species by the RSPB and 3 (**Kestrel, Oystercatcher, House Martin**) as “Amber”. A “Red” species is a bird that is globally threatened or in severe decline. These species are **“the highest conservation priority, with species needing urgent action”**.

<https://www.rspb.org.uk/globalassets/downloads/documents/birds-and-wildlife/birds-of-conservation-concern-4--the-population-status-of-birds-in-the-united-kingdom-channel-islands-and-the-isle-of-man.pdf>

Of the bird species, 10 (**Skylark, Yellowhammer, Starling, Tree Sparrow, House Sparrow, Song Thrush, Kestrel, Red Kite, Siskin, Hooded Crow**) are on the Scottish Biodiversity List. “The Scottish Biodiversity List is a list of animals, plants and habitats that Scottish Ministers consider to be of **principal importance** for biodiversity conservation in Scotland and of **the highest priority** for biodiversity conservation.” <https://www.nature.scot/scotlands-biodiversity/scottish-biodiversity-strategy/scottish-biodiversity-list>

Of the bird species, 6 (**Skylark, Yellowhammer, Starling, Tree Sparrow, House Sparrow, Song Thrush**) are on the United Kingdom Biodiversity Action Plan List. “UK BAP priority species are those identified as being the **most threatened and requiring conservation action** under the UK Biodiversity Action Plan.” <https://jncc.gov.uk/our-work/uk-bap-priority-species/>

Of the Mammals / Reptiles / Amphibians, 4 (**European Hedgehog, Brown Hare, Red Squirrel, Common Lizard**) are on both the Scottish Biodiversity List and UK Biodiversity Action Plan List.

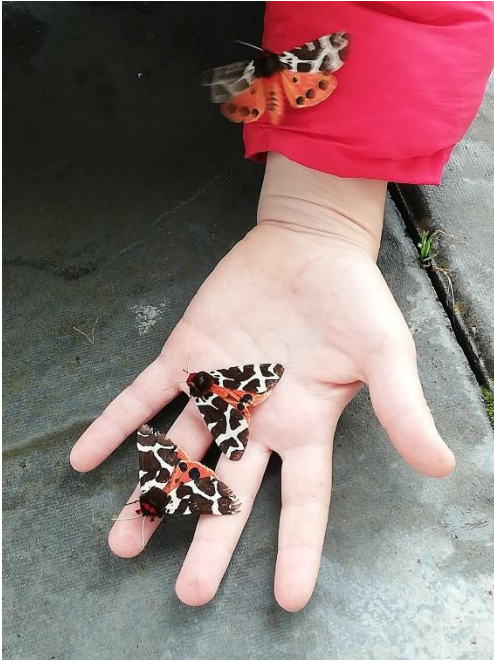
Of the Minibeasts, 1 butterfly (**Small Heath**) and 20 moths (**Autumnal Rustic, Garden Tiger, Feathered Gothic, Sallow, Rosy Rustic, Broom Moth, Knot Grass, Brown Spot Pinion, Green-brindled Crescent, Mouse Moth, Centre-barred Sallow, Latticed Heath, Ear Moth, Streak, Small Square Spot, Ghost Moth, Rustic, Shaded Broad-bar, White Ermine, Grey Dagger**) are on both the Scottish Biodiversity List and UK Biodiversity Action Plan List.

Among the Vegetation, I found 1 species (**Cornflower**) on both the Scottish Biodiversity List and UK Biodiversity Action Plan List.

I attach a few of my favourite photos of some of these vulnerable species. They are beautiful.



Latticed heath moth, Echt, June 2020.



Garden Tiger moths on my hand, Echt, July 2019.



A common lizard in my garden, Echt, July 2020.

As David Attenborough said,

"It's surely our responsibility to do everything within our power to create a planet that provides a home not just for us, but for all life on earth."

"Humanity is now standing at a crossroads. We must now decide which path we want to take. How do we want the future living conditions for all living species to be like?"

"The truth is the natural world is changing. It is the most precious thing we have and we need to defend it."

2. Loss of footpath: If you allow houses to be built here, we will all lose a much-loved path right through the middle of this field that many of us use regularly to enjoy the countryside.

3. More cars: More houses here will mean more cars in Echt. We have very few regular bus services here and no bicycle lanes so most people living in the village are dependent on cars for transport and have multiple cars. More cars means more pollution of the environment. More cars also means more parking which means more concrete. We already have cars frequently parked on the pavements in Echt which is dangerous for children like me. We do not want more cars here.

4. More Waste: More houses means more waste... more rubbish and more sewage. Is there capacity at Echt Waste Water Treatment Works for this extra waste? I understand that Scottish Water have said that Echt Waste Water Treatment Works is operating at or near capacity.

5. Danger to children: I am upset at the thought of dangerous work vehicles using the roads in Forbes Park and Forbes Way to access this field. This is not safe for children like me.

6. Noise and Disruption: I do not want the noise and disruption that the building work will cause. Not only is it unpleasant and unhealthy for us humans, it will be so harmful and disruptive to the wildlife in surrounding areas.

I have surveyed my friends, the other children of Echt village, and found that 100% of those I surveyed do not want you to grant permission for 25 new houses in this field. They gave many of the reasons I am presenting to you.

I attach a joint letter signed by 20 other children of Echt village stating that they do not want you to grant permission for 25 new houses in this field and asking that you remove OP1, Echt from the Proposed LDP 2020.

I would like to know what other sites have been considered for housing. It would be much better to convert disused office blocks or disused hotels into housing than to concrete over more of the countryside. We are all being taught that it is important to recycle. It is important to also recycle buildings and areas that have already been concreted over. With the current COVID-19 situation it is likely that there will be many empty offices and hotels you could use.

Greta Thunberg said, *"You say you love your children above all else and yet you are stealing their future in front of their very eyes." "I care about climate justice and the living planet. Our civilisation is being sacrificed for the opportunity of a very small number of people to continue making enormous amounts of money."* I hope this will not be the case here in Echt.

Please reconsider the proposed LDP for Echt and remove OP1. You are making decisions about the future of our village on behalf of us, the children of Echt, who are its real future.

Many thanks,
Yours sincerely,

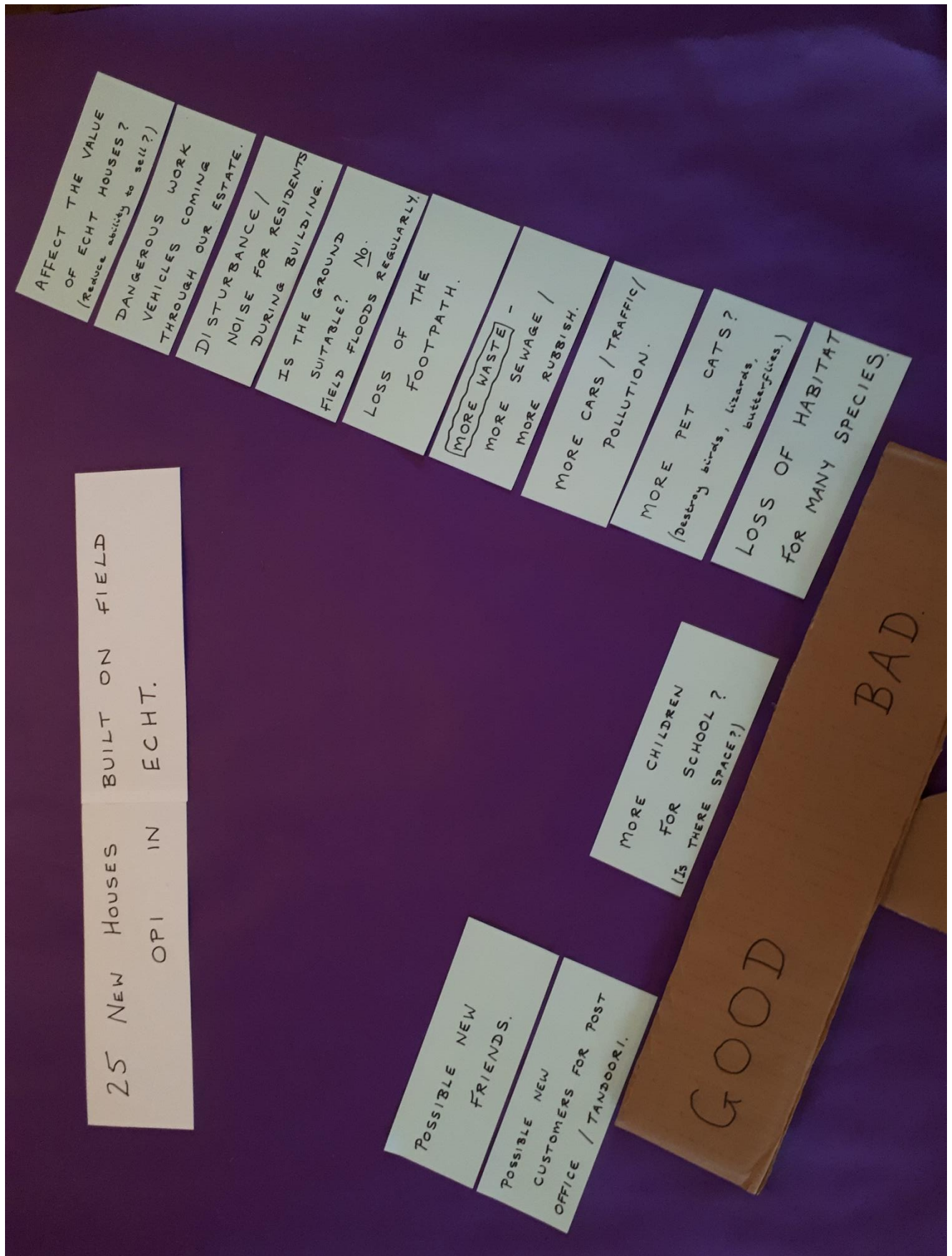
Reuben Jack

(Word count: 1423)

Please find attached:

1. Photograph of my work considering good and bad outcomes of 25 new homes on site OP1, Echt.
2. Ecological Survey of Echt, OP1, July 2020 pdf
3. Echt Children's Response LDP July 2020 page 1, page 2, page 3.

Photograph of my work considering good and bad outcomes of 25 new homes on site OP1, Echt.
Reuben Jack, July 2020.



Ecological Survey OP1, Echt July 2020

Written July 2020 by Reuben Jack (and [REDACTED]). **Wildlife I have found in the field behind my house (labelled OP1, Echt on LDP plans) or in my garden, 15 Forbes Park, Echt which backs directly onto that field between 2017-2020. Many species (including all moths) I have photographed.**

Scottish Biodiversity List available at:

<https://www.webarchive.org.uk/wayback/archive/20160402063428/http://www.gov.scot/Topics/Environment/Wildlife-Habitats/16118/Biodiversitylist/SBL>

or via:

<https://www.nature.scot/scotlands-biodiversity/scottish-biodiversity-strategy/scottish-biodiversity-list>

“The Scottish Biodiversity List is a list of animals, plants and habitats that Scottish Ministers consider to be of **principal importance** for biodiversity conservation in Scotland and of **the highest priority** for biodiversity conservation.”

Royal Society for the Protection of Birds (RSPB) Birds of Conservation Concern 4 available at:

<https://www.rspb.org.uk/globalassets/downloads/documents/birds-and-wildlife/birds-of-conservation-concern-4--the-population-status-of-birds-in-the-united-kingdom-channel-islands-and-the-isle-of-man.pdf>

“The UK's birds can be split in to three categories of conservation importance - red, amber and green.

Red is the highest conservation priority, with species needing urgent action. Red list criteria includes: Species is globally threatened / Historical population decline in UK during 1800–1995 / Severe (at least 50%) decline in UK breeding population over last 25 years, or longer-term period (the entire period used for assessments since the first BoCC review, starting in 1969) / Severe (at least 50%) contraction of UK breeding range over last 25 years, or the longer-term period.

Amber is the next most critical group.”

United Kingdom Biodiversity Action Plan (UK BAP) List available at:

<https://jncc.gov.uk/our-work/uk-bap-priority-species/>

“UK BAP priority species are those identified as being the **most threatened and requiring conservation action** under the UK Biodiversity Action Plan.”

ELD = Environmental Liability Directive

WCA1981 = The Wildlife and Countryside Act 1981

A. Birds identified (25):

(12 species of concern – Skylark, Yellowhammer, Starling, Tree Sparrow, House Sparrow, Song Thrush,

Kestrel, Red Kite, Siskin, Hooded Crow, Oystercatcher, House Martin).

Total = 25	On Scottish Biodiversity List	Threatened Species (RSPB Birds of Conservation Concern 4)	Legally Protected Species	Priority species on UKBAP list	Notes
Skylark <i>Alauda arvensis</i>	YES	RED	ELD / WCA 1981	YES	
Yellowhammer <i>Emberiza citrinella</i>	YES	RED	WCA 1981	YES	
Starling <i>Sturnus vulgaris</i>	YES	RED	ELD / WCA 1981	YES	
Tree Sparrow <i>Passer montanus</i>	YES	RED	WCA 1981	YES	>25% Scottish decline
House Sparrow <i>Passer domesticus</i>	YES	RED	WCA 1981	YES	
Song Thrush <i>Turdus philomelos</i>	YES	RED	ELD / WCA 1981	YES	

Kestrel <i>Falco tinnunculus</i>	YES	AMBER	ELD / WCA 1981		>25% Scottish decline
Red Kite <i>Milvus milvus</i>	YES		WCA 1981		International obligation
Siskin <i>Carduelis spinus</i>	YES		ELD / WCA 1981		>25% Scottish decline
Hooded Crow <i>Corvus cornix</i>	YES		WCA 1981		>25% Scottish decline
Oystercatcher <i>Haematopus ostralegus</i>		AMBER	WCA 1981		
House Martin <i>Delichon urbicum</i>		AMBER	WCA 1981		
Buzzard <i>Buteo buteo</i>			WCA 1981		
Robin <i>Erithacus rubecula</i>			WCA 1981		
Chaffinch <i>Fringilla coelebs</i>			WCA 1981		
Goldfinch <i>Carduelis carduelis</i>			WCA 1981		
Greenfinch <i>Chloris chloris</i>			WCA 1981		
Pied wagtail <i>Motacilla alba</i>			WCA 1981		
Carrion Crow <i>Corvus corone</i>			WCA 1981		
Wood Pigeon <i>Columba palumbus</i>			WCA 1981		
Swallow <i>Hirundo rustica</i>			WCA 1981		
Blackbird <i>Turdus merula</i>			WCA 1981		
Coal tit <i>Periparus ater</i>			WCA 1981		
Blue tit <i>Cyanistes caeruleus</i>			WCA 1981		
Great tit <i>Parus major</i>			WCA 1981		

B. Mammals identified (5):

(3 species of concern – European Hedgehog, Brown Hare, Red Squirrel).

Total = 5	On Scottish Biodiversity List	Legally Protected Species	Priority species on UKBAP list	Notes
European Hedgehog <i>Erinaceus europaeus</i>	YES	WCA 1981	YES	
Brown Hare <i>Lepus europaeus</i>	YES	WCA 1981	YES	>25% Scottish decline
Red Squirrel	YES	WCA 1981	YES	

Sciurus vulgaris				
Common Shrew Sorex araneus		WCA 1981		
Red Deer Cervus elephus		Deer Act 1991		

Note: The frequent sightings of birds of prey including Red Kite, Buzzard, and Kestrel hunting in field OP1, Echt, suggests the presence of other small mammals that I have not yet seen.

C. Reptiles identified (1):

(1 species of concern – Common Lizard).

Total = 1	On Scottish Biodiversity List	Legally Protected Species	Priority species on UKBAP list
Common Lizard Zootoca vivipara	YES	WCA 1981	YES

D. Amphibians identified (1):

Common frog *Rana temporaria* (adult)

E. Minibeasts:

1. Insects:

Butterflies identified (10):

(1 species of concern – Small Heath).

Small Heath *Coenonympha pamphilus* (Adult) On Scottish Biodiversity List. Priority species on UKBAP list. >25% Scottish decline.

Small tortoiseshell (Adult)

Red Admiral (Adult)

Peacock (Adult)

Large White (Chrysalis & Adult)

Green-veined White (Adult)

Orange tip (Adult – male & female)

Common Blue (Adult)

Ringlet (Adult)

Painted Lady (Adult)

Moths (all adults) identified (125):

(20 species of concern – Autumnal Rustic, Garden Tiger, Feathered Gothic, Sallow, Rosy Rustic, Broom Moth, Knot Grass, Brown Spot Pinion, Green-brindled Crescent, Mouse Moth, Centre-barred Sallow, Latticed Heath, Ear Moth, Streak, Small Square Spot, Ghost Moth, Rustic, Shaded Broad-bar, White Ermine, Grey Dagger.)

The State of Britain's Larger Moths 2013 report:

<https://butterfly-conservation.org/sites/default/files/2018-07/State%20of%20Britain%27s%20Larger%20Moths%202013%20report.pdf>

Autumnal Rustic *Eugnorisma glareosa* On Scottish Biodiversity List. Priority species on UKBAP list. (94% decrease in moth population over 40 years. The State of Britain's Larger Moths 2013 report.)

Garden Tiger *Arctia caja* On Scottish Biodiversity List. Priority species on UKBAP list. (92% decrease in moth population over 40 years. The State of Britain's Larger Moths 2013 report.)

Feathered Gothic *Tholera decimalis* On Scottish Biodiversity List. Priority species on UKBAP list. (89% decrease in moth population over 40 years. The State of Britain's Larger Moths 2013 report.)

Sallow *Xanthia icteritia* On Scottish Biodiversity List. Priority species on UKBAP list. (85% decrease in moth population over 40 years. The State of Britain's Larger Moths 2013 report.)

Rosy Rustic *Hydraecia micacea* On Scottish Biodiversity List. Priority species on UKBAP list. (86% decrease in moth population over 40 years. The State of Britain's Larger Moths 2013 report.)

Broom moth *Melanchra pisi* On Scottish Biodiversity List. Priority species on UKBAP list. (84% decrease in moth population over 40 years. The State of Britain's Larger Moths 2013 report.)

Knot Grass *Acronicta rumicis* On Scottish Biodiversity List. Priority species on UKBAP list. (75% decrease in moth population over 40 years. The State of Britain's Larger Moths 2013 report.)

Brown spot Pinion *Agrochola litura* On Scottish Biodiversity List. Priority species on UKBAP list. (82% decrease in moth population over 40 years. The State of Britain's Larger Moths 2013 report.)

Green-brindled Crescent *Allophyes oxyacanthae* On Scottish Biodiversity List. Priority species on UKBAP list. (81% decrease in moth population over 40 years. The State of Britain's Larger Moths 2013 report.)

Mouse Moth *Amphipyra tragopoginis* On Scottish Biodiversity List. Priority species on UKBAP list. (85% decrease in moth population over 40 years. The State of Britain's Larger Moths 2013 report.)

Centre-barred Sallow *Atethmia centrago* On Scottish Biodiversity List. Priority species on UKBAP list. (70% decrease in moth population over 40 years. The State of Britain's Larger Moths 2013 report.)

Latticed Heath *Chiasmia clathrata* On Scottish Biodiversity List. Priority species on UKBAP list. (85% decrease in moth population over 40 years. The State of Britain's Larger Moths 2013 report.)

Ear Moth *Amphipoea oculea* On Scottish Biodiversity List. Priority species on UKBAP list.

Streak *Chesias legatella* On Scottish Biodiversity List. Priority species on UKBAP list.

Small Square Spot *Diarsia rubi* On Scottish Biodiversity List. Priority species on UKBAP list.

Ghost Moth *Hepialus humuli* On Scottish Biodiversity List. Priority species on UKBAP list.

Rustic *Hoplodrina blanda* On Scottish Biodiversity List. Priority species on UKBAP list.

Shaded Broad-bar *Scotopteryx chenopodiata* On Scottish Biodiversity List. Priority species on UKBAP list.

White Ermine *Spilosoma lubricipeda* On Scottish Biodiversity List. Priority species on UKBAP list.

Grey Dagger *Acronicta psi* On Scottish Biodiversity List. Priority species on UKBAP list.

Swallow-tailed moth, *Ourapteryx sambucaria* 60% decrease in moth population over 40 years. The State of Britain's Larger Moths 2013 report.

Garden Carpet, *Xanthorhoe fluctuata* 75% decrease in moth population over 40 years. The State of Britain's Larger Moths 2013 report.

Black Rustic, *Aporophyla nigra* 75% decrease in moth population over 40 years. The State of Britain's Larger Moths 2013 report.

Merveille du Jour

Pink-barred Sallow

Pale-shouldered Brocade

Setaceous Hebrew Character

Common Footman

Antler Moth

Red-green Carpet

Brimstone

Lunar Underwing

Burnished Brass

July Highflier

Common Wainscot
Light Emerald
Bird Cherry Ermine
Spruce Carpet
Scalloped Oak
Pine Carpet
Flame Carpet
Scotch Grass Veneer
Juniper Pug
Svensson's Copper Underwing
Large Ear
Dark Arches
Foxglove Pug
Square spot rustic
Flounced rustic
Frosted Orange
Pale November Moth
Common Rustic
Silver Y
Large Yellow Underwing
Lesser broad-bordered Yellow Underwing
Common Grass-veneer
Elephant Hawkmoth (adult and caterpillar)
Common Carpet
Grey pine Carpet
Canary-shouldered Thorn
Red-line Quaker
Yellow-line Quaker
Dark Chestnut
Angle Shades
Feathered Thorn
Pale Brindled Beauty
Dotted Border
Mottled Grey
Hebrew Character

March Moth
Common Quaker
Chestnut
Pine Beauty
Horned Yellow
Twin-spotted Quaker
March Tubic
Lead-coloured Drab
Buff-tip
Poplar Hawkmoth
Lunar Thorn
Scalloped Hazel
Small Magpie
Treble Lines
Flame Shoulder
Small Phoenix
Chamomile Shark
Common Swift
Clouded Drab
Small Elephant Hawkmoth
Mottled Beauty
Brown Rustic
Yellow Shell
Clay
Marbled Minor
Map-winged Swift
Middle-barred Minor
Clouded-bordered Brindle
Bright-line Brown-eye
Double Square-spot
Barred Yellow
Riband Wave
Barred Red
Coronet
Gold Spot

Lempke's Gold Spot
True Lover's Knot
Dark Arches
Ingrailed Clay
Common Rustic
Muslin Footman
Mouse moth
Pale Prominent
Iron Prominent
Scarce Umber
December Moth
Nut Tree Tussock
Scalloped Hazel
Scalloped Hook-tip
Silver-ground Carpet
Barred Straw
Snout
Coxcomb Prominent
Purple Thorn
Dotted Clay
Sallow Kitten
Pebble Prominent

Other Insects identified (>15):

Black Slip Wasp (adult)
Striped Ladybird (adult)
Common Green Grasshopper (adult)
Squash bug (adult)
Black sexton beetle (adult)
Green shield bug (adult)
Harlequin ladybird (adult)
Cream-spot ladybird (adult)
Two-spot ladybird (adult)
7 Spot ladybird (adult)

Bumble bee (adult)
Other bees (adults)
Yellow jacket wasp (adult)
Blue bottle fly (adult)
Other flies (adults)

2. Arachnids identified (2):

Green-orb weaver spider (adult)
Giant house spider (adult)

3. Myriapods identified (2):

Centipedes (adults)
Millipedes (adults)

4. Molluscs identified (4):

Brown lipped snail
White lipped snail
Garden snail
Slugs

5. Crustaceans identified (1):

Woodlice (adults)

Vegetation found in the field designated OP1, Ect in proposed LDP (28):

Cornflower, *Centaurea cyanus* On Scottish Biodiversity List. Priority species on UKBAP list.

Common Yarrow, *Achillea millefolium*

Common Knapweed, *Centaurea nigra*

Buttercup, *Ranunculus*

Rosebay Willow-herb, *Chamerion angustifolium*

Daisy, *Bellis perennis*
Cow parsley, *Anthriscus sylvestris*
Oxeye daisy, *Leucanthemum vulgare*
White clover, *Trifolium repens*
Red clover, *Trifolium pratense*
Broad leaved dock, *Rumex obtusifolius*
Bird's Foot Trefoil, *Lotus corniculatus*
Milkmaids, *Cardamine pratensis*
Common Sorrel dock, *Rumex acetosa*
Stinging nettle, *Urtica dioica*
Red Deadnettle, *Lamium purpureum*
Common vetch, *Vicia sativa*
Bramble / Blackberry, *Rubus fruticosus*
Foxtail grass, *Alopecurus pratensis*
Yorkshire fog grass, *Holcus lanatus*
Timothy grass, *Phleum pratense*
Cocksfoot grass, *Dactylis glomerata*
Goosegrass, *Galium aparine*
Spear thistle, *Cirsium vulgare*
Herb Robert, *Geranium robertianum*
Lady's Bedstraw, *Galium verum*
Field Scabious, *Knautia arvensis*
Ragged Robin, *Lychnis flos-cuculi*

I attach a few of my favourite photos of some of these vulnerable species.



Swallowtail moth, Echt, July 2020.



Garden Tiger moths on my hand, Echt, July 2019.



Ghost moth, Echt, June 2019.



Sallow moth, Echt, Sept 18.



Latticed heath moth, Echt, June 2020.



Common lizard in my garden, Echt, July 2020.

July 2020
Echt
Aberdeenshire

Dear Sir / Madam,

Re: Proposed Aberdeenshire Local Development Plan 2020.

We, the children of Echt village, and therefore the future of this village, do not want 25 new homes built on the field behind our houses (Site OP1, Echt). We ask that Site OP1, Echt be removed from the Proposed Aberdeenshire Local Development Plan 2020.

Our reasons include:

- The loss of habitat for the wildlife in this field.
- The danger of more vehicles on the roads during and after the building work. We love riding our bikes and scooters around Forbes Park.
- More cars means more pollution. More homes means more rubbish and sewage.
- The loss of our path through that field. We love walking through here.
- The noise and disruption of the building work.

Signed:

Name:	Address:
1. [REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
3. [REDACTED]	[REDACTED]
4. [REDACTED]	[REDACTED]
5. [REDACTED]	[REDACTED]

6. [REDACTED]	[REDACTED]
7. [REDACTED]	[REDACTED]
8. [REDACTED]	[REDACTED]
9. [REDACTED]	[REDACTED]
10. [REDACTED]	[REDACTED]
11. [REDACTED]	[REDACTED]
12. [REDACTED]	[REDACTED]
13. [REDACTED]	[REDACTED]
14. [REDACTED]	[REDACTED]
15. [REDACTED]	[REDACTED]

16.	[REDACTED]	[REDACTED]
17.	[REDACTED]	[REDACTED]
18.	[REDACTED]	
18.	[REDACTED]	
19.	[REDACTED]	[REDACTED]
20.	[REDACTED]	[REDACTED]
21.	[REDACTED]	[REDACTED]
22.		
23.		
24.		
25.		