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Please tick to confirm your agreement to the following statements:

By submitting a response to the consultation, I agree that Aberdeenshire Council can use the information provided in this form, including my personal data, as part of the review of the Aberdeenshire Local Development Plan. This will include consultation on the Main Issues Report (including any subsequent Proposed Plan).

I also agree that following the end of the consultation, i.e. after 8 April 2019, my name and respondent identification number (provided to you by Aberdeenshire Council on receipt of your submission) can be published alongside a copy of my completed response on the Main Issues Report website (contact details and information that is deemed commercially sensitive will not be made available to the public).

The data controller for this information is Aberdeenshire Council. The data on the form will be used to inform a public debate of the issues and choices presented in the Main Issues Report of the Aberdeenshire Local Development Plan 2021. It will inform the content of the Proposed Aberdeenshire Local Development Plan.

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

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- Mr Andrew Lawson, Data Protection Officer, Aberdeenshire Council, Business Services, Town House, 34 Low Street, Banff, AB45 1AY

If you have difficulty understanding this document and require a translation, or you need help reading this document (for example if you need it in a different format or in another language), please phone us on 01467 536230.

Which document(s) are you commenting on?	Main Issues Report <input checked="" type="checkbox"/>	
	Draft Proposed Aberdeenshire Local Development Plan	<input type="checkbox"/>
	Strategic Environmental Assessment Interim Environmental Assessment	<input type="checkbox"/>
	Other	<input type="checkbox"/>

## Your comments

Woodland Trust Scotland (WTS) welcome the opportunity to give our views on Aberdeenshire Main Issues Report, April 2019.

The comments that follow are delivered on behalf of UK's leading woodland conservation charity. We have four main aims: ensuring no further loss of ancient woodland, restoring and improving woodland biodiversity, increasing new native woodland creation and increasing people's understanding and enjoyment of woodland.

We own over 1,000 sites across the UK, covering approximately 27,000 hectares (ha). In Scotland we own and care for around 60 sites covering in excess of 11,300ha which include the 5,000ha Glen Finglas estate and significant urban forestry 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 Trust will object to the inclusion in the Local Development Plan of any development which may impact directly or indirectly on ancient woodland and is not compatible with an ancient woodland site. For assessing the antiquity of woodland we recommend the following process and resources are used: the assessment should start by looking at the Ancient Woodland Inventory, then the historic OS maps 1840-60's (at six inches to the mile) should be revisited, and then the Native Woodland Survey of Scotland should be looked at to assess the presence of mature trees common in the canopy. A woodland survey could also be conducted where the antiquity of woodland is uncertain.

The following site allocations would not be supported by us for development allocation:

### Banff and Buchan

BB019 Site at Birnie Woods, North of Muir Road, Memsie. In this instance we note that the SNH Ancient Woodland Inventory layer showing the ancient woodland is shown in an incorrect place further south west than the actual woodland location. This is a common error throughout the AWI and this is why we recommend that the Council refers to ancient woodland in its natural heritage policy and relies on the Native Woodland Survey as well as on historic maps such as the OS 1<sup>st</sup> Edition maps at six inches to the mile, in addition to the AWI.

### Formartine

FR081 Land at Whiteley Farm, Daviot. If this site is to be allocated for development then the ancient woodland should be excluded from the site allocation and additional buffer native tree planting should be required here. This should be added as a site specific requirement in case of allocation for housing development.

FR102 Land North of Woodland Gardens, Daviot. If this site is to be allocated then the ancient woodland to the south should be buffered by additional native tree planting. This should be added as a site specific requirement in case of allocation for housing development.

FR014 OP2 Methlick. We welcome that there is mention of the ancient woodland in the overview comments

in relation to this site 'There is ancient woodland on the west boundary of the site that must be considered in the layout design.' In addition to this it should be specified that the ancient woodland should be protected from any potential negative impacts from development and additional buffer native tree planting should be considered. These should be added as a site specific requirements in case of allocation for housing development.

FR061 Site 1, Newbarns, Oldmeldrum. We welcome that the overview comments recommend the protection of the ancient woodland. Additional native tree planting should be requested as a buffer to the woodland area, part of site-specific requirements for the developers.

Site 2, Newbarns, Oldmeldrum. Site is not recommended for development allocation due to conflict with ancient woodland.

FR140 Land North of Denview Road Potterton: The overview comments recommend that the ancient woodland adjoining the east 'should be taken into consideration when designing the ayout of the development.' We welcome this and recommend that there is a specific requirement for the protection of the ancient woodland and buffering with additional native tree planting in order to miminise any potential negative effect on the woodland area.

Land North and North West of Denview Road Potterton. Our comments are the same as above for FR140.

FR078 Land at Balmellie and Dalgaty, Turriff: due to impact on ancient woodland on site we would not support the allocation of this site for development as proposed. It is important to note that impact on ancient woodland cannot be mitigated due to the irreplaceable nature of ancient woodland, therefore in the first instance the protection of ancient woodland should be aimed for. If this site is allocated for development, The Trust would be delighted to discuss the ancient woodland protection with the Council.

FR074 Site adjacent to Rosehall, Turriff: we note that this site is not preferred for development by planning officers, and that there is ancient woodland to the north and east of the site. If this site is allocated fro development the ancient woodland area should be protected from any adverse impacts which may result from development. Additional native tree planting could be recommended to help with this.

FR048 Site 1, Land at Wood of Schivas, Ythanbank, Methlick and FR049 Site 2, Land at Wood of Schivas, Ythanbank, Methlick: due to the ancient woodland present on the south of the site we do not support the allocation of this site for development.

#### **Garioch Part 1**

GR087 Sites OP1 and P5, Caskieben, Blackburn: We welcome the requirement that 'The site boundary requires to be amended to exclude an area of ancient woodland to the north of the bid site.' And would not support the site allocated on the ancient woodland area. There should also be a requirement for a buffer area between the site allocation and the woodland. Additional native tree planting could be required as a buffer area.

GR062 Land at St James Place, Inverurie: we do not support this as allocated due to potential impact on ancient woodland.

GR050 Land West of Keithhall Primary School, Keithhall, Inverurie: we do not support this as allocated due to potential impact on ancient woodland.

GR060 Land at Tweedale, Keithhall, Inverurie: we do not support this as allocated due to potential impact on ancient woodland.

#### **Garioch Part 2**

GR054 Land South of Midmar School, Midmar, Inverurie; we do not support this as allocated due to potential impact on ancient woodland.

GR041 Land West of Westhill, South of the A944 (Site 3): we do not support this as allocated due to

potential impact on ancient woodland.

GR143 Land South of Goval Junction, Goval: we do not support this as allocated due to potential impact on ancient woodland.

**Kincardine and the Mears Part 1**

KN034 Site A East of Drumoak: we do not support this as allocated due to potential impact on ancient woodland.

KN026 Land West of A90 Laurencekirk: there is ancient woodland to the west, included in this site allocation. This should be excluded from the site allocation and should be protected by additional native tree planting which can act as a buffer between the development and the woodland area. This same woodland area could be affected by site allocation KN073 Site West of Gaugers Burn, South of High Street, Laurencekirk.

KN107 Land at Caldham Plantation, West of School Road, Luthermuir: we do not support this as allocated due to potential impact on ancient woodland.

**Kincardine and the Mearns Part 2**

KN087 Site OP3, Blue Lodge, Ury Estate, Stonehaven: We welcome the recommendation that 'Nonetheless, development should exclude riparian and ancient woodland, and a buffer strip of at least 12m from Cowie water will be required.' This should be included as part of site-specific developer requirements if this site is to be allocated for development.

KN120 to 122 Mill of Forest Land at Toucks, Stonehaven: we do not support these as allocated due to potential impact on ancient woodland.

KN 069 - 072, Land at Tollohill Wood, Kincardine and Mearns: we do not support these as allocated due to potential impact on ancient woodland.

KN123 Land East of Altries Wood, Maryculter: we support the overview comments made by the planning officers and do not recommend the allocation of this site for development.

KN060 Land at Cairnieburn Wood, Nether Craigwell, Netherley: we do not support this as allocated due to potential impact on ancient woodland.

**Marr**

MR031 Land West of Auchattie, Banchory: we welcome the overview comments and do not support the allocation of this site for development.

There could be additional sites which we have not noted and recommend that planning officers do not support site allocations which could directly or indirectly impact ancient woodland. We welcome that some of the sites listed above have been identified as not preferred for allocation by planning officers due to constraints posed by ancient woodland.

The current LDP policy covering natural heritage is good but Woodland Trust Scotland would be delighted to work with the Council to ensure that this is improved and clear in its requirements for the next LDP.

**Your comments (continued)**