



Proposed Aberdeen Local Development Plan 2015 Representation Form

Please use this form to make comments on the Proposed Aberdeen Local Development Plan, ensuring that your comments relate to a specific issue, site or policy in either the Proposed Plan, Proposed Supplementary Guidance, 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 consultation period runs between Friday 20th March and Monday 1st June 2015. Please ensure all representations are with us by 5pm on Monday 1st June.

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|----------------------------|----------------------------------------------------------------------------------------------------------------------------|
| Name | Mr <input checked="" type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Ian Cowe |
| Organisation | Forestry Commission Scotland |
| On behalf of (if relevant) | |
| Address | Portsoy Road Huntly |
| Postcode | AB54 4SJ |
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Please tick if you would like to receive all future correspondence by e-mail

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|--------------------------------------|-------------------------------------------------------------------------------------|-------------------------------------|--|
| What document are you commenting on? | Proposed Plan | <input checked="" type="checkbox"/> | |
| | Proposed Supplementary Guidance | <input type="checkbox"/> | |
| | Proposed Action Programme | <input type="checkbox"/> | |
| | Strategic Environmental Assessment Environmental Report | <input type="checkbox"/> | |
| Policy/Site/Issue | Trees and Woodlands Policy & Site: OP52 and OP109 & Site: OP62 and OP64 | Paragraph(s) | |

What would you like to say about the issue?

Trees and Woodlands Policy

Forestry Commission Scotland (FCS) recommends that more detail is drafted into the Trees and Woodland section of the plan (p56), in particular Policy NE5 Trees and Woodlands.

Themes from the National Planning Framework (NPF3) and Scottish Planning Policy (SPP) on the protection and development of the trees and woodlands should be built into the plan, specifically:

1) The principle of woodland expansion (NPF3 para 4.23 and SPP para 217)

This principle is a core theme of the Scottish Forestry Strategy and national planning policy and is relevant to Aberdeen City (Aberdeen City Council has planted 60-70ha of new woodland in the past two years - e.g. Tullos hill).

2) The general presumption in favour of protecting woodland resources - as detailed in the Scottish Government's Policy on the Control of Woodland Removal and prioritised in para 218 of SPP.

Aberdeen city hosts significant areas of productive, recreation and amenity woodland (e.g. Kirkhill Forest, Duthie and Hazlehead Parks), this principle is very relevant to the Aberdeen City LDP.

3) Protection and Expansion of Priority Habitats - e.g. Ancient Woodland (Policy principle SPP 194 and detailed in paras 201 and 216). Aberdeen City has significant ancient woodland resource.

Supplementary Guidance

FCS feels that the supplementary guidance does not adequately cover forest and woodland habitats.

I recommends ACC considers revising their Trees and Woodland Strategy (2006) and publishes it as supplementary guidance, as suggested in para 201 of SPP. If this is not possible, considerable revisions to the current supplementary guidance should be presented to address management of woodland areas within the city.

OP52 and OP109

These areas are currently forested and are shown in the Ancient Woodland Inventory, they are Ancient Woodland Sites and a priority habitat requiring protection.

Ancient woodland has important biodiversity and cultural values by virtue of its antiquity. Scottish Planning Policy identifies it as an important and irreplaceable national resource that should be protected and enhanced. They usually have much richer wildlife than that of more recent woods and once destroyed, they cannot be recreated.

SPP paragraph 218 recognises the significance of The Scottish Government's Policy on The Control of Woodland Removal. The policy states that there is a strong presumption against removing ancient woodland, the highest level of protection afforded by the policy; any future proposal for development at OP52 and OP109 will not be able to meet the requirements of Scottish Planning Policy or the Scottish Government's Policy on the Control of Woodland Removal and as a result these do not make appropriate option sites.

OP62 & OP64

These sites are all, or partially afforested, SPP and the Scottish Government's Policy on the Control of Woodland Removal state that there is a general presumption in favour of protecting woodland sites, as a result they do not make ideal option sites for the LDP. If alternative sites are not available, provision to require mitigation planting as detailed in the Control of Woodland Removal should be required with any future consent for development.

Further Information

Scottish Government Policy on the Control of Woodland Removal (2009)

[http://www.forestry.gov.uk/pdf/fcfc125.pdf/\\$FILE/fcfc125.pdf](http://www.forestry.gov.uk/pdf/fcfc125.pdf/$FILE/fcfc125.pdf)

What change would you like to see made?

As above.

Please return the completed form by:

- post to the Local Development Plan Team, Aberdeen City Council, Business Hub 4, Ground Floor North, Marischal College, Broad Street, Aberdeen AB10 1AB; or
- email to ldp@aberdeencity.gov.uk

The representation form can be filled in, saved, e-mailed and/or printed. You must “save as” to ensure the completed form is saved with the changes you have made. If you need more space, please fill out another representation form or send a word document attachment via e-mail with your completed representation form. **Please ensure all representations are with us by 5pm on Monday 1st June.**

Thank you. For more information, please visit www.aberdeencity.gov.uk/aldp2016 or to contact the Local Development Plan Team call 01224 523470.

Data Protection Statement

The comments you make on the Proposed Plan will be used to inform the Local Development Plan process and the Examination into the Local Development Plan by the Scottish Ministers' Reporter. You must provide your name and address for your representation to be considered valid, and this information will be made publicly available. Other personal contact details such as telephone and e-mail will not be made public, although we will share these with the Reporter, who may use them to contact you about the comments you have made. For more information about how Aberdeen City Council maintains the security of your information, and your rights to access information we hold about you, please contact Andrew Brownrigg (Local Development Plan Team Leader) on 01224 523317.