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Strategic Place Planning
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By email to: ldp@aberdeencity.gov.uk

25 May 2018

Dear Sir/Madam,

Aberdeen Local Development Plan Review - Pre- Main Issues Report Questionnaire 2018

Thank you for consulting RSPB Scotland on the Aberdeen City Local Development Plan pre-MIR questionnaire. Please find below our responses to relevant questions.

Q 2.5 What do you think should be our main planning priorities for providing infrastructure? (For example, how should new infrastructure be provided and how might it be paid for?)

The provision of new, and enhancement of existing, green infrastructure should be a priority as required by Scottish Planning Policy (see paragraphs 220 and 221), as this type of infrastructure is often afforded far less attention and priority than that given to 'grey infrastructure' such as roads. Green infrastructure should be designed to be multi-functional, of benefit to nature as well as to people.

Q 2.6 What do you think should be our main planning priorities for transport and accessibility? (For example, how can we make it easier to travel in and around Aberdeen? Should we look at pedestrianisation in the City Centre?)

In guiding development, the council should take into account the implications of the location and density of housing developments for the ability of new homes to be zero carbon (bearing in mind the need for all homes to be zero carbon by 2050). Research has shown that higher density housing, and housing located closer to services and where people work and shop, results in lower carbon dioxide emissions and has the potential to increase wellbeing. Housing cannot be truly 'low carbon' for example if it is built where people have to commute long journeys by car. New development should be supported by good public transport links and active travel infrastructure.

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Q 2.7 What do you think should be our main planning priorities for ensuring we have high quality buildings and places? (For example, how can we better protect our built heritage and ensure high quality and sympathetic architecture and landscape design?)

RSPB Scotland believes that developers should be required to incorporate existing or new biodiversity assets within the design of proposals. Features such as bird nest boxes and bat boxes are easy to accommodate in new building construction and can bring huge wildlife benefits. This would be of particular benefit to red-listed species such as the common swift. We would be pleased to provide more advice on these opportunities to the council. Please also see our response to question 2.11 below.

Q 2.9 What do you think should be our main planning priorities for meeting Aberdeen's housing and community needs? (For example, how can we meet the needs of people who cannot afford mainstream housing?)

Development should be focussed in existing settlements. This will help to minimise the impact on the wider countryside and will reduce the need for new infrastructure.

Q 2.11 What do you think should be our main planning priorities for protecting and enhancing the natural environment and preventing flooding? (For example, what areas or features should we be safeguarding?)

The Nature Conservation (Scotland) Act 2004 places a 'Biodiversity Duty' on public bodies to further the conservation of biodiversity and to have regard to the Scottish Biodiversity Strategy (2004). Our obligations to stop the loss of biodiversity by 2020 are extremely challenging and it is important that the planning system plays its part in helping achieve them by preventing additional net harm and creating additional or enhancing existing habitat to replace that which is lost whenever possible. Scottish Planning Policy (paragraph 194) confirms that the planning system should seek benefits for biodiversity from new development where possible, including the restoration of degraded habitats and the avoidance of further fragmentation or isolation of habitats.

The mitigation hierarchy is an approach designed to achieve 'no net loss' (and if possible a 'net gain') in biodiversity, firstly through avoidance of impacts, then if impacts can exceptionally be justified, through mitigation or minimisation of impacts and finally, as a last resort only in very limited circumstances, through habitat restoration or compensation. We consider that the LDP should emphasise a requirement to robustly apply this mitigation hierarchy when planning for and considering proposals for all developments. (In cases affecting designated nature conservation sites e.g. Special Protection Areas, a more robust legal framework is already in place.) Application of the mitigation hierarchy will help to halt cumulative small-scale losses of biodiversity from development and help to achieve no net loss of biodiversity.

RSPB Scotland would welcome the strengthening of the policy of the current LDP which seeks to protect and enhance the natural environment (Policy NE8 – point 4).

The Scottish Borders Council Local Development Plan (2016) states that any development that could impact on local biodiversity through impacts on habitats and species should (a) aim to avoid fragmentation or isolation of habitats; (b) be sites and designed to minimise adverse impacts on the biodiversity of the site; (c) compensate to ensure no net loss of biodiversity through use of biodiversity offsets as appropriate, and (d) aim to enhance the biodiversity value of the site. We suggest a similar policy approach should apply in Aberdeen City.

We would welcome policy that allows contributions to be sought from new developments towards offsite biodiversity enhancements (even if they are not directly offsetting impacts on the development site). This would help to strengthen and develop Scotland's National Ecological

Network. Falkirk Council Local Development Plan (2015) is an example of a LDP that includes such a policy (Policy GN01 Falkirk Green Network).

The publication of Supplementary Guidance or other detailed planning advice on biodiversity, to support the Local Development Plan would also be welcomed. This would assist the Council in meeting its Biodiversity Duty and help address issues relating to the occurrence of significant Biodiversity Action Plan species on undesignated sites or not covered by a policy on protected species.

There are a number of Local Nature Conservation Sites (LNCS) which are designated for nature conservation, as well as those areas designated for their national or international importance, within and adjacent to the city boundary and these should be fully considered within the plan. Scottish Planning Policy states that 'international and national designations can be complemented by local designations which protect, enhance and encourage the enjoyment and understanding of locally important landscapes and natural heritage. Local designations should be clearly identified and protected through the development plan'. The identification and protection of Local Nature Conservation Sites by Local Authorities was an action identified in the Scottish Biodiversity Strategy Action Plans 2004-8.

The inclusion of locally important biodiversity sites would assist the Council with its duty under the Nature Conservation Scotland Act (2004) to further the conservation of biodiversity when carrying out all its functions and to take measures to enhance biodiversity where possible. This principle of enhancing biodiversity should apply to all sites and not just those that are designated.

In order to respond to the impacts of climate change, the relevant policies on climate change need to explicitly state the need to seek opportunities for habitat creation and natural flood management. To address flood risk, opportunities for natural flood management should be explored. This will also lead to habitat creation and biodiversity enhancement. Flood risk solutions should not merely focus on hard engineering and 'grey infrastructure'.

Similarly, new Sustainable Drainage Systems (SuDS) should maximise benefits to biodiversity. The RSPB and the Wildfowl and Wetlands Trust have produced an advisory handbook on SuDS development. This can be found at: http://www.rspb.org.uk/Images/SuDS_report_final_tcm9-338064.pdf.

Q 2.12 What do you think should be our main planning priorities for ensuring that resources and waste are managed sustainably? (For example, can we make more innovative use of waste as a resource? Should we encourage renewable energy use? How could we do these things?)

The development of well-sited and well-designed renewable energy technologies of all types and scales should be supported by Aberdeen City Council.

Please do not hesitate to contact me if you require any further information on the above.

Yours sincerely,



Jenny Weston
Conservation Officer

