

Perth and Argyll Conservancy

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Conservator
Syd House

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Dear Sirs

Perth and Kinross Council Local Development Plan
Main Issues Report

Thank you for inviting Forestry Commission Scotland to respond to this consultation exercise. There are a number of points and observations that we would like to make, and rather than answering the questions within the document, my comments relate to individual paragraphs and sections as read through.

- 2.3.2 – Will planning gain be used to help enhance the environment and if so how?
There has been a loss of cultural features (eg Orchards, large trees) as a result of planning. How will features be protected if the importance of other cultural features is not recognised?
- 2.3.4 – Why only identify and promote green networks where they will add value etc. ALL green networks have a value albeit for different reasons and as such all should be promoted.
- 4.3.17 –The Big Tree Country project has proven to be a unique selling point for Perth and Kinross, attracting a number of significant events throughout the year. This aspect should be celebrated within the MIR and greater emphasis placed on the successes to date and future options to continue with this.
- 4.4.5 – No reference is made to the significant cultural aspect of the landscape and countryside and this should be considered as it provides a genius loci. It is not just buildings, monuments and battlefields that need protection, but previous land use e.g. the oak lined roads of Glen Almond.
- 4.4.14 – Policies are very good if they are applied and understood. As such there should be a presumption against removal of trees of any description that have a cultural significance. For woodland expansion etc, the Forestry Commission published 'the Right tree in the Right Place' advice note that is directed at Local Authorities (pub May 2010 and downloadable from FC website). Why create supplementary guidance when guidance is there and approved by Scottish Government?

- 4.4.16 – How do you propose protecting green networks from development? Will green network maps be produced that development fits into rather than green networks having to fit into developments? Will mitigation be covered under section 75 agreements and if so will it provide for potentially larger areas than are lost?
- 4.5.11 – Combined heat and power are acceptable methods of producing power, but only if the generated heat is fully utilised through for example a district heating scheme. In the first instance where affordable housing is being considered, then district heating schemes using bio-mass should be the preferred option (unlike the 'affordable housing scheme at Kirkmichael that relies on electric storage heaters, hardly an affordable option!)
- 4.5.16 – Woodland does act as a carbon sink, but the more commercial species (eg Sitka spruce) are also the most effective. A balance needs to be struck between site types and objectives etc to ensure the right tree in the right place for the right reason. There should also be a strong presumption against tree removal (Griffen wind farm a prime example of losing a significant carbon sink of conifers to a wind farm development). The Scottish Government through the Forestry Commission produced a policy paper on the control of woodland removal (Feb 2009 and downloadable as a pdf) this should be considered as a PKC guidance note
- 4.5.17 – As per 4.4.14
- 4.5.24 – Within the proposed policy I would like to see woodlands included for protection as areas for significant carbon capture.
- 4.5.29 – One of the causes of flooding is a compaction issue within the catchment and flood plains of the rivers. Agricultural practices have introduced significantly bigger machines onto the land with ploughing to standard depths. All this work creates an impervious compaction pan. This can be alleviated by ripping of sites and allowing water into the ground where it then takes longer to get to rivers. The same occurs on new developments where heavy machinery is used to both compact and create gardens and open space. There should therefore be a policy that seeks to address compaction problems and that this could form part of planning conditions on sites. It is easy to check. Woodlands help to slow down the flood waters and as such help to reduce damage. Newly planted areas are equally effective, not as a result of the tree size, but because the ground has been cultivated and compaction pans reduced.
- 5.2.9 – In principle I support the ideal of a network of green corridors like a spiders web connecting communities to the countryside and beyond. To make this work though will require a robust policy that considers not just a proposed development site, but also connectivity to and from the site using for example a 1km buffer. Planning gain should be considered to make sure that structural tree planting etc is in place to both strengthen existing green networks, and to fill gaps in green networks. Planning policy should recognise the benefits that are derived from green space and restrict any proposed building works to an agreed and measured distance from these corridors. There are far too many examples of development encroaching on green space and trees (for example Huntingtower). This leads onto woodland removal and loss of habitat. Trees with root systems damaged by construction vehicles, new sewers etc with buildings close to them become a risk to the building. Before construction the trees were safe and it is the buildings that have made the trees unsafe

5.2.25 – Map 12 indicates a significant area of housing within the boundary of Scone. It is also where route c of the cross Tay link is suggested. We cannot condone the removal of trees for development gain, and I am also not sure how happy new residents would be if the development is split in 2 by a major new road.

Map 17 page 92 – The proposed development would result in the loss of a historic pear orchard and also encroach on a scheduled monument. This cannot be condoned

I have not been able to assess all the proposed development sites in relation to woodlands and other green space. I would however welcome further discussion on this and would advocate that the Council looks at the proposed sites from a different angle. Consider what the site has to offer in terms of quality green space and open space and seek to maximise the potential of these, as they will benefit the setting of new properties. Why should we be considering proposals where properties will butt onto existing quality green space and an arbitrary area of open space created within the development. The green space should incorporate the open space and this will provide for a much better development with an increased area for public enjoyment. With careful design, there should be no loss in the number of units that the site will accommodate.

I am currently working with PKC to develop a new Indicative Forest Strategy. The aim is to have this completed and consulted on by September 2011

I look forward to hearing from you and helping to develop the LDP

Yours faithfully