

## Opposition to Land Development Plan 180 on the Basis of its Biodiversity

This objector wishes to join those protesting against the proposed wedge into the green belt represented by Land Development Plan 180. He strongly objects to the destruction of a local amenity and he sympathises with those worried about access, drainage considerations, the effect of the proposed development on a major water main running through the site and its adverse effect on an ancient monument. Most of all however this is an objection to the proposed destruction of a biologically rich area and the effect that development will have on its biodiversity. He wishes to draw attention to the following features of its biodiversity that will be adversely affected by the proposal:

- 1) **Bird diversity** – Bird survey work conducted in the area for the British Trust for Ornithology since 1979, most recently for the Bird Atlas 2007-2011, shows that between 40 and 50 species of bird nest annually in the area. Many of the most vulnerable do so in the area identified in the development plan 180. These include Buzzard, Sparrow Hawk, Great-spotted Woodpecker, Chiffchaff, Blackcap and Jay. The latter is close to the northern edge of its range in the UK. In addition Nuthatch, a species that requires woodland or parkland habitat, has recently colonised just outside the development area 180 and this, together with Balloch Castle and a site in Argyllshire currently appear to be the most northerly sites for the species in western Britain. It is doubtful if they would remain in the area if the development goes ahead.
- 2) **Amphibians** – the pond at NS571743 supports a large breeding population of Common Frog and Common Toad
- 3) **Butterfly diversity** – two species of butterfly that are currently increasing their range in Scotland, namely the Ringlet and the Orange Tip have substantial colonies in the area identified in development plan 180. In addition the shallow soils in the south western portion of the area supports a colony of the Common Blue which breeds on the Birds-foot Trefoil that grows on this sunny bank. Small Heath, a species that has declined throughout Britain, is also present.
- 4) **The moth assemblage of the area** – regular moth trapping by the Dunbartonshire and Stirlingshire moth recorder has taken place in Balfleurs Street since 2002 on the fringe of site identified in the development plan 180. 259 species of moth have been recorded. Very few of these will be breeding in local gardens but will originate from the habitats in the area of Development Plan 180. One of these species, *Rhigognostis incarnatella*, is classified as Nationally Scarce Category A, another, the Pretty Pinion (*Perizoma blandiata*) is classified as Nationally Scarce Category B and a further 26 species are classified as local in their UK distribution. The charity Butterfly Conservation in conjunction with Rothamsted Research Station has identified 61

species of moth that in the UK as a whole have declined in abundance by over 75 % in the forty years between 1968 and 2007. Nineteen of these species are represented in the 259 species from the area. In addition, the day flying moth, the Six-spot Burnet has a colony on the Birds-foot Trefoil growing on the south-facing shallow soils of the site. Inland colonies of this species are uncommon.

- 5) **Other insects** – Many species of bee, fly and beetle visit and feed on the diverse plant life of the area and of particular importance are several species of solitary bee that nest in the shallow sand surrounding the Dovecot. The Green Tiger Beetle also breeds in this area. The very boggy wood that forms a part of the development plan supports a wide diversity of those beetle and fly species that develop in rotten wood and the pond at NS571743 supports many aquatic insects.
- 6) **Plant, algae and fungal diversity** – the rich flora of the area identified in development plan 180 supports the above insect diversity both as larval food-plants and nectar sources. Plant-life diversity includes four species of orchid (Spotted, Northern Marsh, Greater Butterfly Orchids and Broad-leaved Helleborine). Particularly noteworthy is the Round-leaved Water Crowfoot which grows in the drainage ditches and is at the northern edge of its UK range. The area undoubtedly support a very rich assemblage of mosses, liverworts, fungi and algae but these are outside the area of expertise of this objector and it would be necessary to conduct a full assessment to clarify the risks to these faunal groups posed by development.

The development plan for 180 admits that the site encompasses important habitat. It goes on to suggest that development would “consolidate the existing woodland and wetland habitat.” This statement is clearly nonsense. How will building 200 houses on this site protect what has been listed above?

In addition to all of the points raised above with respect of Development Plan 180, this objector would be interested to know whether the entire East Dunbartonshire Development Plan meets reasonable legal requirements to keep those whom the council represents informed on issues that affect their environment.

Professor John T. Knowler

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