

THE TULLOS HILL REPORT

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Background information on Tullos Hill, Aberdeen City Council's 'Tree for Every Citizen Scheme and issues surrounding it, recommended actions, and the case for retaining the Hill's current ecosystem or enhancing its grass and meadow lands to preserve and encourage biodiversity

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EXECUTIVE SUMMARY

Aberdeen City Council intends to attempt a tree plantation Tullos Hill. The first phase of planting failed, and the City had to return £43,800 to the Forestry Commission. The reasons for the failure are given in a 2008 soil report. The poor soil quality is a reason for poor growth and wind throw is highly likely. Other conditions on the hill include underground landfill gas. There are warning signs concerning explosion risk and signs banning open flames. These signs are posted on high fences topped with barbed wire. The soil report on the failure of the first planting cites lack of weed control (weed control will be needed for several years); the use of 90cm instead of 120cm tree guards, and deer browsing. Arson is also an issue. The weather can be violently windy, and the hill is adjacent to the North Sea. It is not ideal for a tree plantation when these factors are considered.

The council was meant to consult with stakeholders about this new tree planting scheme (robust consultation, written communication with residents, and liaison with community councils). Community councils had not been given any details re. the deer cull, local residents had no letters, and the public consultation omitted important factors. The deer cull's genesis appears to be in a meeting between City Council operatives and a SNH visitor in late 2010. This small number of people took it upon themselves to rule out the non-lethal methods for planting trees (they wrote of the expense of such methods but did not consider funding could have been found). They favoured the cull, but did not consider the suitability of the hill for tree planting. The public consultation detailed rabbit fencing to protect trees, but made no mention of deer. As the City did not mention the cull alongside rabbit control, many assumed there were no other animal issues. Therefore, there was no large-scale objection until after the cull 'leaked out'. An elected community council member and the author were prevented from speaking at a Housing Committee meeting (on a technicality) held after the cull became public knowledge. This act alone shows there was no meaningful consultation. The consultation also omitted the years of 'weed control and the number of trees planned for Tullos Hill (89,000 – which will forever change the hill). It emerged that the funding application is only at the draft stage – although City advised that the scheme is cost neutral. Had people known of the £43,800 grant repayment at the time of the public consultation, it would have been grounds for objection as well. It is unlikely that a large scale planting will succeed; funds have already been wasted trying; and the public want the hill as it is with its existing biodiversity. Objection is very widespread – thousands have signed petitions, hundreds have signed letters and community councils have lodged formal objections. The Scottish SPCA calls it 'abhorrent and absurd' to cull deer to protect trees which don't even exist yet. After the public outcry, general statements such as 'deer culls are needed' are being made by a backtracking City council, but the cull was always a direct by-product of the desire to plant trees.

Tullos Hill is already enjoyed by the public. Grasslands like Tullos are seen as essential for biodiversity – not least butterflies and bees. Aberdeen City is cash-strapped; so expending funds and energy on this project is also a cause of concern. The forestry scheme was launched at a time when targets for creating forests were all-important. [Saving our Magnificent Meadows - The Case for Greater Funding to Conserve and Enhance the UK's wildflower-rich grasslands](#)¹ is a report resulting from a project funded by Natural England, Countryside Council for Wales, SNH, NI Environment Agency and Plantlife. EU and UK environmental agencies acknowledge that meadow and grass land loss is a serious issue. [Saving our Magnificent Meadows](#) advises grassland losses in England may have been stemmed, but this is not the case in Scotland. Aberdeen is about to lose grasslands at Loirston (for a football stadium which will have a huge carbon impact in construction and operation), and at Cove (for housing). The Tullos Hill tree-planting scheme needs to be halted, and the hill either

¹ Saving our Magnificent Meadows – Appendix 12

left as is, or funding sought to enhance without dramatically altering, its existing, and rich biodiversity.

1. LIST OF TABLES, FIGURES, & PHOTOGRAPHS

- A. Alpha Fencing truck on Tullos Hill, 24 October 2011
- B. Tire Tracks directly behind Alpha Truck, 24 October 2011
- C. Disturbed earth and uprooted gorse thrown on live gorse plant, Tullos Hill, 24 October 2011
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- E. One of the 3 Tullos Hill cairns - note setting and un-obscured view 2011
- F. Tullos Hill view towards North Sea
- G. Montage of flora, fungi and ferns October 2011 Tullos Hill
- H. Dames Violets Tullos Hill May 2011
- I. Aberdeen City Council, May 2004, "Carbon Management Programme – Outcomes & Action Plan
- J. Table of Objections to points in the 'Tullos Hill Community Woodland' draft application
- K. Table from Saving our Magnificent Meadows, Estimates of the extent of UK BAP Priority Grasslands in the UK

2. INTRODUCTION

2.1.The Hill

“Tullos Hill is a District Wildlife Site within easy walking distance of the Coastal Path. It offers fine views of the City and contains numerous archaeological sites, including Bronze Age burial cairns dating from about 2000BC. This large area of dry heathland attracts large mammals such as foxes and roe deer. Work is continuing to improve the wildlife and path networks in this area”. – ‘Aberdeen’s North Sea Trail’, Aberdeen City Council²

Tullos Hill lies to the south of Aberdeen and has been used since prehistoric times, and contains three large scheduled monuments as well as other smaller bronze-age remains (some if not all of the smaller ones have been damaged or lost). A portion of the hill near the coast had been used for agriculture, and other coastal part of the hill had been used for decades for waste disposal. A tip-capping exercise has been underway on the tip for several months. At the waste tip signs warn that no open flames are permitted, and an area at the top of the hill further inland poses explosion risks from landfill gas. SITA monitor this area by means of a number of gas sampling wells. This area is surrounded by high fencing topped with barbed wire, and posted signs warn of explosion risk. Some of the waste is or was radioactive. The soil condition at the landfill site is detailed in a report from Forest Research of 24 November 2008³, where mostly ‘made-ground’ soil conditions were found. The report shows that

“The made-ground, whilst providing a loose medium that was rootable in physical terms, was poorly consolidated and low density, which leaves trees prone to premature wind-throw...”⁴

The weather conditions on Tullos Hill, which is on the North Sea, can be extremely harsh in winter, and at the time of writing this report, a severe weather warning for the area has been issued by The Met Office: “Very windy again with severe westerly gales or storm force winds in places. The public should be prepared for potential structural damage to buildings and the possibility of interruptions to power supplies in the more exposed areas and of the risk of disruption to travel.”⁵

At the time of writing, the ownership of Tullos Hill is unclear. It may have been part of lands deeded to the people of Torry and as such may be Common Good Land. The author’s requests to the Master of Mortifications at Aberdeen city Council for clarification went unanswered, and are now with the Freedom of Information Office, as the Master of Mortifications does not have a list of properties held by the Mortification Trust. The Information Request is to be answered by 20 December 2011. Freedom of Information requests have not been handled particularly well concerning this scheme as will be seen later.

2.2.The Current Environment and Ecosystem

Despite the decades of use as a rubbish tip, and on-going arson incidents, the flora and fauna are numerous, healthy and diverse.

There is year-round flowering gorse which provides food and shelter to insects, birds, small animals and deer. Much gorse has been cleared in recent years, including gorse being uprooted

² – ‘Aberdeen’s North Sea Trail’, Aberdeen City Council²

³ Report: Site visit to Tullos Hill landfill site, Aberdeen, 24th November 2008”, Forest Research – Appendix 1

⁴ IBID

⁵ The Met Office, 27 November 2011, http://www.metoffice.gov.uk/weather/uk/gr/gr_forecast_warnings.html

in October by Alpha Fencing apparently under SITA's direction at the top of the hill – the gorse was uprooted for fencing and thrown on living gorse plants nearby)⁶. The meadows near the three cairns flower annually with hundreds of Dames Violets; this is a well-known feature locally and a draw to the area. The spectrum of biodiversity is very much the same as for the other meadow / coastal areas south of Aberdeen City⁷. There are rabbits, deer, foxes, voles and moles in the area. Wildflowers include the Dames Violets, yarrow, chamomile, thistle and large beds of heathers. Numerous bird species are found. A 2003 survey of birds at adjacent Doonies Farm showed many species which were on the RSPB's list of medium and high conservation concern⁸. Several photos taken on Tullos Hill in this report illustrate the Hill's diverse nature.⁹ Doonies Rare Breeds Farm, Lochinch and Tullos Hill are within 'Loirston Country Park' – the welcoming signs to these areas bear the City's insignia. These signs also explain the area's importance environmentally.



A. Alpha Fencing truck on Tullos Hill, 24 October 2011



⁶ See photographs A-C and Appendix 2 – email to SITA from Suzanne Kelly

⁷ Appendix 3 – Bird, Plant and Animal Records from Lochinch and Coastal path area

⁸ RSPB Volunteer & Farmer Alliance 2003 Doonies Farm Bird Survey – Key Results. Map produced by RSPB.

⁹ Photographs D-I

B. Tire Tracks directly behind Alpha Truck, 24 October 2011



C. Disturbed earth and uprooted gorse thrown on live gorse plant, Tullos Hill, 24 October 2011



D. Tullos Hill D view to north May 2011



E. One of the 3 Tullos Hill cairns - note setting and un-obscured view 2011



F. Tullos Hill view towards North Sea



G. Montage of flora, fungi and ferns October 2011 Tullos Hill



H. Dames Violets Tullos Hill May 2011

2.3. Threats to the Local Area's Environment and Ecosystem

2.3.1. Loss of Greenbelt

The largest threat to the wildlife south of Aberdeen is arguably the huge loss of greenbelt to development which is imminent. The Aberdeen Football Club is about to build a 21,000 seat stadium and office complex adjacent to Loirston Loch and nearby Lochinch Interpretation Centre (run by Aberdeen City Council). This area is within the Dee Estuary Special Area of Conservation and contains EU protected species. Nevertheless, Aberdeen City Council passed the planning application despite local community councils and residents opposing the scheme at a public hearing. (Legal action is expected on a number of points). Not only will the stadium's construction mean a permanent loss of greenbelt land, its operation means a considerable increase in pollution from vehicles. Nearby Wellington Road, which is near the western boarder of Tullos Hill, already has vehicular emission pollution in excess of EU limits:

"Based on the monitoring and modelling work undertaken by the Council, several areas have been identified as unlikely to be meeting national objectives and European limits, and hence the Council have declared AQMAs. The air quality problem in Aberdeen is predominantly a result of emissions from road vehicles, as is the case elsewhere in the UK, and this is reflected in the locations of the AQMAs... **Wellington Road** (declared December 2008, from the Queen Elizabeth II Bridge to Balnagask Road)..."¹⁰

Across from the proposed football stadium, on the other side of Wellington Road, Stewart Milne Housing has plans for much of the remaining open green land. The sites which will be used for the stadium and for housing largely constitute meadowlands.

2.3.2. Importance of Meadowlands and their continuing loss

Tullos Hill is already a valuable meadowland, and with the loss of greenbelt meadows described above, its loss would be devastating to wildlife. The impact of the loss of meadows represents permanent loss of hunting, nesting and breeding land. The environmental charity Plantlife has done a great deal of research into the disappearance of meadows in the UK. It produced a report, Saving our Magnificent Meadows,¹¹ and campaigns on this issue. Saving our Magnificent Meadows is led by Natural England, Countryside Council for Wales, Scottish Natural Heritage, and Northern Ireland Environment Agency, and by Plantlife, as project host. Some key points from a summary of this report are as follows:-

"Summary

Wildflower-rich grasslands are arguably the UK's most threatened habitat. They are recognised as precious and important ecosystems, supporting a rich diversity of wild plants and animals, including many rare and declining species. These habitats are increasingly seen as contributing to the overall well-being of our society, and to the 'services' that healthy ecosystems provide, such as carbon sequestration (capture), amelioration of flooding and a more efficient cycle of nutrients which improves soil health and productivity... They are seen as vital to the long-term survival of bees, through whose pollination of crops much of our food production depends... Despite their high nature conservation value, our wildflower-rich grasslands are in decline, both in extent and in quality. Many of our meadows in the UK were lost during the last century. Intense pressure, particularly from changes in farming practices, as well as development and neglect, continue to impact on the remaining areas. Despite conservation legislation, including an EU Habitats Directive (which incorporates six BAP priority

¹⁰ Air Quality Action Plan 2011, Aberdeen City Council, 2011

¹¹ Saving our Magnificent Meadows, Appendix 12 also at http://www.plantlife.org.uk/campaigns/saving_our_magnificent_meadows/

grassland types in Annex 1), planning legislation and two decades of agri-environment schemes, wildflower-rich grasslands continue to disappear or decline in condition. During the 1980s and 1990s, losses were recorded at 2 – 10% per annum in some areas. High-diversity grasslands now comprise a mere 2% of UK grassland ($\geq 1\%$ of total land area). Once lost, these species-rich meadows cannot easily be recreated. These declines meant that the UK was unable to meet its national and international commitments to halt the loss of grassland habitat and species biodiversity by 2010.

2.3.3. Lack of Protection of Wildlife – arson, motorists, vandalism and pollution

It is an unfortunate reality that arson is a persistent problem on the hill. Grasses and gorse are set alight. The hill has many access points (it is also used by motor bike enthusiasts). However, there is only one area of official signage at an entrance the writer can find. The signs by the City Council helpfully says how important the area is and how it should never be developed (although development has somehow been sanctioned at Loirston) – but it gives no warning whatsoever against setting deliberate fires. At the very least a sign should be posted at all entrances saying what the legal penalties for arson are, and ideally saying what wildlife is present and that it needs to be protected. Vandalism occurs on the hill in other forms than the arson – and it should be noted that vandalism has been a factor in tree-planting projects nearby at St Fittick's and on the hill as well. Signage should also list penalties for littering (the hill is regularly cleaned by volunteers) –but more needs to be done. There is a burnt-out car on the hill, which the City has not moved – pollution from its components could be severe, especially if the battery is present for instance). Small mammals and birds are found dead on roadsides all over Aberdeen City and Shire, yet very few signs are present to warn motorists when they are near wildlife-rich areas. Road signs need to warn motorists that deer and small animals are in the area. This would be standard practice in similar areas in the United States and other countries. Fitting deer scarer reflector posts (they reflect car headlamp beams into the countryside to scare deer away from roadsides) at any areas of high risk of deer/car collisions should be done throughout Aberdeen City and Shire. Further recommendations will be made later in this paper.

3. 'TREE FOR EVERY CITIZEN' PROJECT

3.1.Genesis

The concept of 'A Tree for Every Citizen' was an election pledge made by the Liberal Democrats – Councillor Aileen Malone of Cults, Bieldside and Milltimber reinforced this at a community council meeting in May 2011; the author of this report was present. She is also quoted in press releases made at the time in support of the scheme. It is necessary to go back further than the launch of the Phase 2 public consultation and what followed in order to create a complete picture, and re-address the selective nature of documents and information put out by Aberdeen City Council. Issues which were known but not brought to public attention include the poor soil quality, location issues, previous incorrect use of tree guards, years of 'weed control/spraying' required, and not least the deer cull – which had been in planning long before the Phase 2 consultation was launched to the public.

A previous phase of the 'Tree for Every Citizen' scheme largely failed on Tullos Hill. The report of 24 November by Forest Research details a visit to the hill made with ranger Ian Tallboys. This visit was in part to establish why the previous planting failed. The following items appear in that report:-

*“deer browsing is known to be significant... where tree guards have been used they are insufficient in height (90cm rather than 120cm guards are in use)”;*¹²

*“A strict regime of weed control for a period of 2-3 years will strongly facilitate tree establishment at Tullos Hill”;*¹³

And crucially:

“It is noteworthy that the establishment of large mature trees on many parts of Tullos Hill is unlikely. The rootable material is unlikely to be able to provide adequate anchorage, increasing the risk of wind-throw, especially given the exposed, coastal location.”¹⁴

Despite the evidence of this report, deer were literally made the scapegoat. In Mid November 2010 the SNH visited the hill with an Aberdeen City Ranger. The two had discussions which led to the issue of a SNH letter of 25 November 2010¹⁵. The letter from the ‘Wildlife Operations Unit’ makes no mention whatsoever of the soil condition or the weed control requirements (see Appendix 4). It however refers to conversations in which non-lethal means of controlling the deer population are systematically discounted. It reads in part:-

“

Given that we have ruled out non-lethal control options, it would appear that lethal control is the only option and it is certainly the option that we would recommend to you. We understand the potential PR issues and are willing to offer the Council what assistance we can in this regard. I am sure you are well aware of the arguments, but would suggest that majoring on the fact that public money would potentially be wasted if deer management is not carried out and the trees fail to establish is a good first line. There are many other lines that can be explored, including some of the foregoing arguments about non-lethal mechanisms for deer management.

On the specifics of deer management, I can see both advantages and disadvantages in the use of either contractors or staff. As long as anyone involved is suitably experienced and insured, there should be no difference in the outcome. It may be preferable to be seen to be doing it in house and have greater control rather than using contractors, or it may be preferable to utilise the distance between instruction and deed that comes from using contractors.

Having visited the site, I am content that appropriate deer management can occur in a safe manner. Communicating this to access takers and the wider public may be more of a task which will require a robust communication plan. I would suggest that a suitable deer management plan will help in this regard and I am more than happy to offer assistance in this regard. Further to this, it will be necessary to have at least some idea of deer numbers on the site. I would propose that SNH staff conduct a night time census using thermal imaging equipment and possibly a spotlight. I would suggest that we try to organise this at the earliest available opportunity and would request your assistance in obtaining vehicular access and a permit to work. This census will not provide a definitive picture of deer utilisation of the site, but will give a minimum index of deer present.

This letter is remarkable on several counts. It demonstrates clearly that the cull was being planned between the City and SNH, and yet the City did not mention any such fact in its public consultation. This document will be examined next. It also demonstrates a predisposition on the part of whoever exactly briefed the SNH. Deer management does not have to be lethal. Even the use of the correct size tree guards might have been effective (although it looks like almost every other factor needed for tree establishment was lacking). This letter seems to be one person (albeit the SNH Deer

¹² Report: site visit to Tullos Hill landfill site, Aberdeen, 24th November 2008”, Forest Research

¹³ IBID

¹⁴ IBID

¹⁵ Letter from James Scott, Deer Management officer (SNH), to Richard Nicholson, (ACC), 25 November 2010; Appendix 4

Management Officer) and person or persons unknown deciding in advance how the tree planting would be accomplished – without any recourse to the normal democratic channels or to the other reports on soil quality and weeds. Elected officials might have reasonably expected to be presented not with a report showing the cull was necessary and the finance was in place (which is what happened), but rather with an unbiased report examining all of the issues of Tullos Hill, not a purely deer-culling policy decided by non-elected persons.

The launch of the Phase 2 Consultation to the public is at Appendix 13. This document made no reference to deer whatsoever. It did however mention that fencing would be required for rabbits. The writer concluded – as did hundreds of others – that if the method of planting described concerned itself with rabbits, then if other animal control or weed killer were needed, they too would have been mentioned. Almost every Councillor or council official supportive of the scheme the author has contacted claimed that this consultation was not about the methodology of the planting. If a document mentions the methods of rabbit control, then it is indeed a document concerning methodology. There was no mention that 89,000 trees – a very large share of the total number of trees – would go on Tullos Hill; the density would have also been a cause for objection. The consultation closed at the end of January 2011, several months after the SNH letter regarding the cull had been written.

3.2.Objections

3.2.1. 'Tree for Every Citizen' Phase 2 – Tullos Hill: Objections arising from Scheme's Origins and early Management

Councillor Aileen Malone is Convener of the City's Housing & Environment Committee under which falls the remit for the 'Tree for Every Citizen' scheme. At its meeting of March 2011 the Committee took a report from Peter Leonard, proposing that the scheme to plant on Tullos went ahead. Leonard claimed:-

"3.1 The Tree for Every Resident project which started large scale tree planting in February 2009 is being delivered on a cost neutral basis through grant funding and contributions from local businesses. The second phase of the Tree for Every Citizen project will be entirely funded through external grants and sponsorship.... An arrangement has been reached with Forestry Commission Scotland to enable a new scheme to be started. This will be funded through the Scottish Rural Development Programme and other grant funding which is achievable and cost neutral". 16

The meeting then had a chance to vote on several options of deer control, but it did not discuss the other issues with the tree planting, known to Aberdeen City rangers and officials, but not disclosed to those debating the matter at this meeting. And as it transpired only in October 2011, the funding is far from a certainty – only a draft application has been submitted at the time of writing.

A very odd outcome arose from this meeting: it was resolved to give campaigners until the next meeting – 10 May 2011 – enough funds to find a manner of saving the deer. Press at the time were specific in reporting that this offer was to find money to save the deer from culling. The Council have told the writer in November 2011 that the press got this and other issues wrong. As the Scottish Society for the Prevention of Cruelty to Animals put it, to kill the deer to protect trees that aren't even planted is 'abhorrent and absurd.' Dame Anne Begg, MP, wrote to the author of this report saying

¹⁶ Aberdeen City Council Housing & Environment Committee, 1 March 2011, Report at Item 9.6; Appendix 5

*"You will note with interest that the Housing & Environment Committee recently decided to extend an open invitation to individuals who have objected to the deer cull to raise the funds necessary (£225,000) to facilitate alternative measures such as fencing and re-housing, by 10th May 2011. I see this as an appalling attempt to fudge their responsibilities."*¹⁷

Many animal charities came out and openly called the City's demand for money 'blackmail'. One charity, Animal Concern Advice Line (ACAL), has repeatedly offered the services of an expert in the area of non-lethal tree-planting for free. Peter Leonard has since written to say this person is not an expert – which may well become part of a complaint Animal Concern Advice Line is considering, as the person in question has a relevant background. Animal charities recommended people not give in to the demand to raise money. Instead, a petition was launched and other forms of actions took place.

Between November 2008 and March 2010 the problems with the hill somehow were mutated by the scheme's proponents from being soil, location, weed, vandalism and deer-related to being merely deer related and a cull was the cheapest and best solution. The report writer wishes to object to the apparent politicization of this tree-planting scheme and the decisions taken which left the public in the dark at the consultation phase – and which seem to have left some of the elected members likewise without all the facts. The demand for funds as it turned out later was not going to stop a cull according to Peter Leonard.

3.2.2. Objections - Procedural

In the intervening weeks the author attended Torry Community Council, neighbours to the Tullos site. They had not been given any advance information as to a cull. The Community Council then resolved unanimously to condemn the cull, which was done with a strongly-worded letter to Peter Leonard¹⁸. For some reason the City Council say this letter was never received, and a copy has been posted in November 2011. The letter reads in part:-

I am writing to you on behalf of Torry Community Council (TCC). At the TCC meeting on 21 April 2011 we discussed the matter of the proposed cull of deer on Tullos Hill. Many members of TCC were horrified that Aberdeen City Council is proposing to cull deer on Tullos Hill, instead of building deer fences to protect the trees in the 'Tree for Every Citizen' programme. A vote took place at the meeting, and the culling of deer on Tullos hill was unanimously condemned.

TCC requests that ACC does not to plant trees on Tullos Hill if a cull of deer is required to make the planting of the trees for the 'Tree for Every Citizen' programme at Tullos Hill successful.

Additionally, I would like to highlight that no contact has been made with Torry Community Council about a cull of deer immediately adjacent to our community, or the plans for planting trees in and adjacent to Torry. I would be grateful if you could explain the reason why no consultation and awareness raising has been undertaken.

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¹⁷ Anne Begg to Suzanne Kelly, 25 March 2011 from the Houses of Parliament

¹⁸ Letter from Torry Community Council to Pete Leonard originally posted 10 May 2011; re-posted November 2011 Appendix Item 6

¹⁹ Letter from Torry Community Council to Pete Leonard originally posted 10 May 2011; re-posted November 2011 Appendix 7

A selection – not an exhaustive one - from other Community Councils opposed to the cull is also in Appendix 7.

I sent an email to Aileen Malone as did other Aberdeen residents; I included my name and address in this complaint. Ms Malone went to the press to say ‘only about one’ Aberdeen resident had contacted her on the matter. She later sent an email to the author of this report to apologise for ‘accidental deletion’ of the email in question. There are other Aberdeen citizens who contacted Ms Malone with their addresses, but no correction was ever made to the initial press story that ‘about one’ person had objected.

The author of this report intended to make a deputation to the next Housing & Environment Committee to voice the many concerns (the cull, the suitability of Tullos for the trees and lack of transparency). Also requesting a deputation to address the matter at the Housing & Environment 10 May meeting was Andy Finlayson of Cove Community Council and the Association of Community Councils. Aileen Malone, convener of the Housing meeting initially said the deputations would not be heard. Councillor Cooney and others demanded a vote on the matter, but in the end the deputations were not heard. The reason: only a verbal, not a written report on the deer cull financing was to be presented. This technicality prevented the deputations from complaining about the lack of transparency and accuracy in the public consultation and the lack of proper consultation with the Community Councils – four of which have at the time of writing objected to the cull formally to the City. The report author notes that the Aberdeen City draft application reads in part:-

“Local community consultations, including contact with all relevant Community Councils, holding of local drop-in events open to the public, letter drops in specific neighbourhoods directly adjoining proposed planting areas, placing of planting plans and proposals on the consultation area of Aberdeen city Council’s website to provide transparent information regarding the planting proposals have all been carried out.”²⁰

With all due respect, the report writer begs to differ with this assertion, and assumes the eventual final draft proposal will reflect the truth – community councils were kept in the dark before the vote to proceed, and completely ignored when they rejected the scheme outright. Thousands of petition signers likewise feel that the consultation, omitting the cull as it did, was less than transparent.

Pete Leonard reiterates that the refusal to even contact the expert suggested by Animal Concern was because they lacked credentials, and because the city already had an expert. The author of this report only knows of the city’s expert who was apparently hired by contract to deliver this scheme. Even the most thorough of experts is subject to making errors, and even the most impartial expert may be tempted to favour outcomes which are linked to their fiscal remuneration. It is not suggested that this is the case here, but the author questions the impartiality of an expert who refuses a free expert’s opinion and who refuses to even communicate directly with others in their field. Later on Pete Leonard refers to a lack of peer review as a factor in rejecting the Animal Concern Advice Line expert. The author of this report wonders whether any form of peer review of the Tullos Hill proposed planting has taken place with any expert who does not stand to gain either financially or by reputation, and will recommend that such review takes place.

²⁰ Draft application for Case 4381713 from Aberdeen City Council Grampian RPAC region. Appendix 8

The report author has had fruitless letter exchanges with the City Council; these are reproduced in the Appendix. Among the writer's questions which have gone without clear, concise answers are:-

- Who made the decision to leave any deer cull out of the public consultation?
- Who took the decision that non-lethal measures would be discounted and then communicated to SNH?
- Who precisely decided to plant the trees on Tullos Hill, and why wasn't the deer population immediately identified as a reason to find another location?
- Who decided tree guards' visual impact was preferable to a deer cull? Whose aesthetic judgment decided the tree guards had 'visual impact'?
- How many trees were vandalised in Phase 1?
- How much public money was spent in Phase 1, and how much is planned to be spent in Phase 2?
- Was a consultation with Torry Community Council taken, and if so, were the deer discussed?
- How many deer were counted by SNH, and how many are to be culled?

Calling the procedures used to choose culling as the method for the planting robust is therefore discredited. Why there is so much support from Councillor Malone, Ranger Ian Tallboys, Chief Executive Valerie Watts and Pete Leonard for this otherwise unpopular scheme is something which should be investigated: Tullos is a hill where a large-scale tree planting has failed and will likely fail again in the words of Forestry Research due to many factors, not simply deer browsing. Why are some officials going to such lengths to impose this scheme?

3.2.3. Objections – Environmental & Cultural

The Roe Deer was adopted into the Scottish Biodiversity List, published in 2005; arising from Section 2(4) of the Nature Conservation Act (Scotland) 2004, and the Scottish Biodiversity Strategy, it is *"a list of animals, plants and habitats that Scottish Ministers consider to be of principal importance for the conservation of biodiversity in Scotland."*

The Tullos Hill roe deer are thought to number less than 30 head at present. Much has been made since the cull was proposed that deer need to be managed or they will starve / suffer as there are no natural predators. This is simply not true; deer are hunted legally and illegally (a hunter was recently spotted on Tullos Hill and reported to the police), and the young deer can be subject to predation by foxes. The report writer has not been presented with evidence for starving deer or overpopulation by those who take this position – notably Ian Tallboys and Pete Leonard. The fact that deer roam over several sites in the south of the city has been overlooked in the SNH letter and by those who have written to support the cull. The report writer has instead talked to people who live in the adjacent homes and caravan park. None of these people were aware of the cull or the tree scheme (although they draft application claims letters have been sent to such people). There are some people at the caravan park who feed the deer. These deer may be wild or partially tame. Some time ago a number of tame deer were kept at Loirston Loch; what has happened to them is not clear and should be investigated as part of any holistic local deer management scheme. As two animal charities have put it to the author, if the hill could not sustain the deer, they would not be there. There is movement of deer between Kincorth Hill, Tullos and other areas. If the Tullos deer are culled, then the experts from Animal Concern and other animal welfare entities are of the opinion that other deer would simply move into the territory.

One Local Authority, Glasgow City Council, responded to the WaNE (Scotland) Bill consultation by opposing the fundamental approach to Roe Deer being regarded as a threat,

and it is their policy to manage individual problems, should they arise, in a manner which does not involve the killing of these much-loved animals. Glasgow's Ecologists assessed the impact of Roe Deer browsing in young plantations (very little deer fencing or tree protection was used) and found no cause for concern; the deer grazing rarely had a significant effect on tree survival, but did affect the structure of the woodland in a way that was overall beneficial for nature conservation. Over a million young trees have been planted on Local Nature Reserves and other sites within the City in the past twenty years, and now are all thriving wildlife habitats.

The Tullos area is currently used by locals for walks, to enjoy the uninterrupted views over the city and to view the cairns in the un-observed setting they currently enjoy. The cairns will all be screened by the trees if the scheme goes ahead. There are many archaeological remains which have been damaged over time; but the planting map²¹ indicates the site of several small disturbed cairns will simply be planted over. Combined with the loss of Bronze Age archaeological features which the Loirston football stadium means, this further erosion of Bronze Age sites should not go ahead.

However, it is the importance of the existing grassland / meadowlands which make Tullos invaluable. It is disturbing that so much gorse has already been removed. Dr. Ian Rotherham* has this to say on the subject:-

"Gorse is an incredibly valuable habitat for wildlife – supporting a diversity of invertebrates and many birds and mammals. It provides dense cover plus abundant nesting sites, invertebrate food associated with the gorse, and of course the blaze of flowers during much of the year. Butterflies, bees, hoverflies, spiders, badgers, whinchats, stonechats, yellowhammers, chaffinches, linnets, greenfinches, meadow pipits and skylarks for example, all thrive in gorse-rich areas.

"As the biomass of gorse builds up it loses vigour and begins to die back. If there is a fire then the gorse is reduced to ground level and will quickly regenerate for the next 30-40 years or so. Clearly fire risk can be a problem but not for the gorse or the associated wildlife (except at the immediate time of a conflagration).

"Cyclical cutting of gorse, grazing, and cutting of fire-breaks are positive ways to reduce risk and damage but to maintain what is a rich but often unappreciated wildlife habitat. The establishment of a friends group to watch over the area would also help reduce risk. The gorse in bloom is also a wonderful landscape feature. A plantation wood does not provide a biodiversity resource or a landscape feature to match this. Trees are often planted at the expense of the wildlife habitats and landscape features because of the misconception that they are inherently better for wildlife – which they are not – and because money is available as grants to do this."

*(Dr Rotherham is a Professor of Environmental Geography, Reader in Tourism & Environmental Change, International Research Coordinator, associated with universities around the world. He is editor of several important academic publications including International Journal of Urban Forestry, Journal of Practical Ecology & Conservation, and International Urban Ecology Review)

The meadowlands of Tullos are valuable as they are for supporting wildlife (including bee populations, which are at risk worldwide due to many factors including habitat loss). The carbon sequestration value of the meadow is not inconsiderable and will be sacrificed for a tree planting which is likely to fail. Much has been made by the City as to how the trees will

²¹ Map of intended planting Appendix Item 9

clean CO2 from Aberdeen, but there is little data to say how many trees would actually survive or what their carbon capture value would be. Here are some figures from an old City report:

I. Aberdeen City Council, May 2004, “Carbon Management Programme – Outcomes & Action Plan”

Table 1: Aberdeen City Council's Corporate Emissions Profile 2002/03

	Buildings¹	Streetlighting²	Transport³	Transport Fleet⁴	Waste⁵	Total	Transport Commute⁶
CO₂ emissions (tonnes) (%)	51,200 (82%)	6,300 (10%)	800 (1%)	3,800 (6%)	-	62,100	20,300
Costs (£) (%)	4,800,000 (62%)	897,000 (12%)	933,000 (12%)	1,110,000 (14%)	-	7,740,000	-

Notes:

1. Data from energy management team, based on combination of data from monitoring and energy bills
2. Data based on inventory and standardised assumptions on usage. Traffic signals are included.
3. Data excludes air and rail travel. Data based on miles claimed not fuel usage, data unlikely to be accurate to enable calculation of carbon emissions.
4. Data based on data provided by Transport team on fuel consumption.
5. No data for landfill sites available.
6. Data based on a survey dated June 2001 (covered 22% of staff) and relates only to car commute. Due to subjectivity of evaluating travel distances, level of uncertainty relating to accuracy (see below).

In 2004, ACC survey figures indicated that some 22% of staff answering the survey said their car commute to work produced some 20,300 tonnes of carbon in 2002/03. It should be noted that the construction of the Loirston Loch stadium will have a carbon footprint as will the buses being arranged to get all the fans to and from the stadium. Additionally, the city didn't count its air travel in the 2002/03 figures.

When the 'tree for every citizen' plan was new, Mr Lochhead of the Scottish Government and Aileen Malone were quoted in an Aberdeen press release²². Here is an excerpt:-

“Many of the woodlands being created will be in the middle of communities – in one case right underneath a tower block – so they will provide a focal point for community involvement, leisure and recreation”. “They will also soften the urban environment and – by soaking up around 15,000 tonnes of CO₂ over 50 years – help provide a greener, cleaner future for the people of Aberdeen.”

If the press release was referring to the one in Balnagask the trees were partially vandalised

Returning to the carbon question, The City's position seems to be that fifteen thousand tonnes of carbon would be cleared or offset by the 94,000 trees in only 50 years. If in 2002/03 the City's buildings, transport, street lights made 7,740,000 tonnes of carbon PER YEAR, then the Tullos trees – all of them would have to reach maturity –to offset one year's worth of City Carbon in 50 years at 2004's rates. Or, looked at another way, if all the trees

²² 'Aberdeen gets greened up' press release march 2010

mature, then each year they would possibly clear around 0.2% of that pollution each year. This hypothetical benefit should not be an excuse to replace the carbon sink which Tullos Hill already has in its meadow and grasslands.

The above quotation contends that the trees would provide a focal point for communities. This has proved to be quite true –but not for the reasons the press release writer envisaged.

3.2.4. Objections – Local Stakeholders

This report has already demonstrated that community councils have objected to and/or completely condemned the cull and the way the consultation was handled. In addition there are some 2,400 signatures on a paper petition collected locally (delivered to Aileen Malone), a Facebook community of just under 3,000 people and another Facebook site with some 170 followers. A postcard campaign against the cull was launched; the author of this report will be seeking an investigation as there is controversy. The writer personally handed in 63 postcards to a security guard at the council who offered “we got loads of these this week and even more the week before.” In a letter Valerie Watts says the number of postcards received was 35. The number of signatories on a new petition launched to save Tullos as Meadowlands currently stands at the 400 mark at the time of writing. It can be found at <http://www.gopetition.com/petitions/tullos-hill-meadowlands-deer-park.html>

With such vocal and powerful opposition to the unpopular tree scheme and cull, it is difficult to understand the reticence of those behind the tree scheme to abandon it or even to compromise. The City refuses to meet with the experts who offer non-lethal solutions, the City rules out 120 cm tree guards for having ‘visual impact’ (letter of 25 November from SNH), and insist a cull must take place. When the planting is likely to fail according to the soil report, the dogged pursuit of this scheme should perhaps be investigated.

The author of this report confirms that locals she has spoken with in the adjacent caravan park and homes had no contact from the City on this scheme. It should be noted that one major stakeholder has been left out of the loop completely: Network Rail. They are now aware of this scheme for 89,000 trees to be planted on the hill; they have track adjacent to the hill, and should have been consulted. The author of this report can see potential problems with leaves, fallen trees if severe storms hit, and of course with the issue of arson. For that matter considering this week’s severe storm and the Soil Report’s concern over wind, there is a possibility of any trees which did get established falling in windy conditions - injury is not an impossibility.

3.2.5. Objections to draft application for ‘Phase II’ planting

The author of this report was most surprised to learn that the application for the Phase 2 planting on Tullos Hill has not advanced past the draft stage. Since March of this year the press and councillors were told that the Phase 2 tree-planting scheme *is* cost neutral – not that it *would be* cost neutral *if applied for and then approved*. Clearly this ‘cost neutral’ claim as repeated by the proponents several times is misleading. Considering the logic used by the Chief Executive to defend her non-disclosure of the £43,800 cost of the previous failed planting, the logic employed to claim the scheme is cost neutral seems a contradiction.

The author of this report obtained a copy of the draft application from the Forestry Commission. The objections to points in this draft are many, and are summarised on the following table.

J. Table of Objections to points in the ‘Tullos Hill Community Woodland’ draft application

Draft Application item	Comment
Case Detail “Tullos Hill is former agricultural land...”	A portion of the hill was farmed – but the writer is informed by locals (and by observation) that a large amount of the hill has never been farmed, nor would have been suitable farmland. This point should be clarified.
“Tullos Hill is situated within, and provides a significant landscape backdrop to a heavily industrialised area on the southern edge of Aberdeen City...”	The northern and western boundaries of Tullos Hill are industrialised, but the northern side also abuts St Fittick’s – a non-industrial area, and the western edge can also be deemed a corridor to nearby Kincorth hill, and animals move between these sites (Wellington Road is in between them). However, the eastern edge is non-industrial coastline except for where the tip was allowed to form, and part of the southern border is adjacent to non-industrial park land. Tullos Hill itself is called ‘urban’ by Pete Leonard. This view is not universally shared, and the area can be described as a wildlife pocket in a peri-urban zone.
“The overall aim of this Proposal is to re-establish a community woodland on Tullos Hill...”	The writer is not aware that there was a previous ‘community woodland’ – and for that matter a definition of ‘community woodland’ would be helpful.
“...on part of which previous WGS Scheme to establish woodland has largely failed...”	Either a woodland was established or not. The writer notes the admission that the previous WGS Scheme has largely failed.
“The aims of the Proposal are: (1) enhance the local landscape and backdrop to the southern edge of Aberdeen City;”	Whether a forest is an enhancement over a meadow is a purely subjective matter. The fact is however that the un-obscured view from and of the hill and its cairns would be obscured by such a large forest plantation.
“(2) help develop, conserve and enhance the connectivity of the network of woodland and open habitat in and around the City and in particularly [sic] strengthen the visual and public access values of green corridors between St Fitticks’ to the north and Kincorth Hill to the west.”	Leaving aside the further subjective comments as to ‘visual’ values, the loss of the open ground / meadowlands of Tullos will be a huge dent to the already diminished greenbelt in the South of the City. If the City were truly concerned about ‘connectivity’ of habitat, then it would have applied the same concern to the developments coming to Cove and Loirston.
“(3) help facilitate enhancement of the historical value of Tullos Hill through restoration, subsequent maintenance and interpretation of the various archaeological sites;”	The writer can find no specific plans for such archaeological ‘interpretation’ and would be interested in obtaining the specifics. However, the main cairns will be obscured by trees, as shown on the proposed planting

Draft Application item	Comment
	map. It seems that trees are to be planted over many of the damaged smaller archaeological sites; this will neither restore nor enhance. The relevance of this claim to a forestation application is not completely clear to the author of this report.
(the draft skips from number 3 to number 5)	The author of this report would like to know if this is simply one of several typographical errors the draft contains, or if there is a separate Item No. 4 under the aims of the Proposal.
“(5) Manage and progressively regenerate the areas of over mature woodland along the northern boundaries of the site;”	The author of this report notes that the trees on the northern edge which were successfully established are on the most sheltered area of Tullos Hill, which probably contributed to their survival.
“(6) improve public access and recreation facilities, and enhance the sense of place within Tullos Hill;”	If the area is intended to be a money-making timber forest, as is claimed by some of the proponents, then it seems unlikely it can also accommodate animal populations and ‘recreation facilities’. How precisely public access would be improved without further removing green areas needs to be spelled out. The author of this report notes the further subjective language viz ‘sense of place’ – and would like to ask the proponents to define this, and to explain what is wrong with the current perceptions those who enjoy Tullos Hill in its current state.
“(7) Foster strong community involvement in the restoration and management of the site;”	The fact that a burned out car has been on the hill for some time bodes ill for the council’s regard for the hill, or perhaps it wishes the hill to ‘go downhill’. The lack of signage warning against illegal acts is further evidence of negligence on the City’s part. AS to fostering strong community involvement, the communities near the hill and further afield are united in their strong opposition to this forestation programme at the expense of a meadow, its deer and other existing wildlife.
“(8) Contribute to the reduction in the City’s carbon emissions through the creation of new woodland and associated carbon capture.”	The author of this report feels this is nothing more than what is termed ‘greenwash.’ The hill has a carbon capture capacity as it is; to dig it up to plant trees which a soil report says are doomed to failure will add to carbon emissions. The decision to allow a football stadium to be built will have far more carbon production than the proposed forest can possibly offset, making the City’s attempt to

Draft Application item	Comment
	sound pro-environment rather hollow.
<p>“The majority of existing invasive gorse cover will be removed prior to planting and controlled regrowth controlled.”</p>	<p>Aside from the confusing phraseology ‘...controlled regrowth controlled.’, the author of this report is dismayed that gorse is seen as ‘invasive’ rather than being an extremely important habitat and food source, as Dr. Rotherham and others have shown it to be. The writer is also concerned at the haphazard removal of gorse which took place as detailed earlier in this report. There are times when gorse can and cannot be cleared, and it seems the relevant laws are not being upheld by the City and its contractors. The author of this report wishes an investigation into this area. The economics and environmental logic would dictate that the gorse and meadowlands exist because the nature of the hill favours them over trees. The desire to impose a large forest on a meadow is neither logical nor commercially sound.</p>
<p>“Deer numbers will be controlled as necessary under Deer Management Plan [sic] to ensure that damage is kept to acceptable levels whereby overall woodland establishment is not compromised.’</p>	<p>Again, the deer are being used as the main excuse for the failure of the tree scheme in the past. This draft makes no mention of the 2-3 years of weed control which has been prescribed. What form will this take? What will be the cost, the effect on plants and animals, and indeed people in the vicinity? These questions have not been addressed in any of the information supplied to the author of this report. This application makes reference to ground preparation techniques – the author of this report will be interested to know how this will be done on this area, given its gas/explosion issues.</p>
<p>“Appropriate levels of deer management will be carried out in accordance with recommended best practice.”</p>	<p>Again we return to the deer. There are guidelines for managing deer population in woodlands; this is not a woodland, nor as the tree scheme’s proponents will have people believe is it a static deer population. Claims have been made the hill is too small for the 29 deer alleged to be there. The deer have been in a stable population for decades (anecdotally since at least the 1960s) without any starvation/overpopulation issues. If there are guidelines of the number of deer a piece of ground can support, then the entire greenbelt in the vicinity should be counted and not just Tullos when it comes to deciding there are ‘too many deer.’ The Scottish</p>

Draft Application item	Comment
	SPCA, to remind the reader, calls this specific planned cull 'abhorrent and absurd.' The author of this report can supply specifics concerning the Scottish SPCA and comments made by the Chief Executive of Aberdeen City Council, who had tried to imply the Scottish SPCA 'did not understand' the issue. This established animal charity's representative most assuredly does understand Tullos Hill's situation.
"Improved carbon sequestration – soils and woodlands...The proposal...will contribute to targets... Improved carbon sequestration is identified as of particular importance in the list of Regional Priorities for Grampian."	The carbon figures which this planting would deliver, if successful, need to be completely analysed against the hill's current carbon sequestration. Again, the City is making other decisions which will greatly add to the existing vehicular pollution on nearby Wellington Road.
"... the Council is nonetheless working closely with local communities and businesses... in encouraging community involvement in the planting proposals."	In some of the (conflicting/contradictory) financial information that has come out, it seems the City is relying on using the community and schools in particular to serve as volunteer labour for planting. They will need to acknowledge that the communities do not support this scheme, and schools will be most reluctant to be involved.
"1.4 Integration. The proposal is complementary to, and contributes to the delivery of a number of Regional Priorities."	This rhetoric does not justify the Forestry Commission continuing to finance a scheme which will not work, as the soil report shows.
"1.7 Contribution to national targets. The proposal will contribute to achieving local Conservancy and national targets for new woodland creation."	When the original targets for woodland creation were created, the loss of meadowland had been to a large extent overlooked. The SNH and other agencies are at present re-thinking some of the targets of the past, and a move to meadow creation is gaining ground. The Tullos Hill scheme needs to be weighed in terms of its past failure, likely continued failure, and the comparative ease of retaining/enhancing its meadow features.
"Group 2 – Value for Money"	The author of this report has pointed out that this scheme cannot represent value for money. The letter from D.Cadel to the City warns its exposure may exceed £100,000. This was the letter in which the City was reminded to pay its overdue £43,800 for the failed planting.
"Added Value. The new woodland creation will complement and add value to the increased level of, and more proactive and holistic approach to, the management of	The author of this report needs this rhetoric to be explained before they can comment.

Draft Application item	Comment
Aberdeen City's woodlands..."	
"Long term benefit. The benefits of the new woodlands... improving the quality of life for the City's people and historic environment far beyond the Rural Development Contract period."	The assertion that the replacing a meadow with a woodland will 'improve the quality of life' is highly subjective.
"Group 3 – Management of Risk"	The author of this report notes the absence of any mention of potential risks of arson, accidental fire, and potential damage to nearby homes, industry and a school. There is no mention of potential risk to the Network Rail tracks. There is no mention of risk a 2-3 year weed spraying plan entails. There is no mention of the likely financial loss should this planting fail as the first did. The author of this report concludes the 'risk' management is less than robust in this draft.
"3,2 Minimising impacts. Local community consultations, including contact with all relevant Community Councils, holding of local drop-in events open [sic] to the public [sic], letter drops in specific neighbourhoods directly adjoining proposed planting areas, placing of planting plans an proposal on the consultation are of Aberdeen City Council's website to provide transparent information regarding the planting proposals, have all been carried out."	These statements are in some instances simply not true (eg no letters sent to households as far as research and door-to-door visits has shown) or is misleading. The Phase 2 consultation document reproduced in this report is very, very far from transparent as the considerable public outcry proves. As far as transparency is concerned, the author of this report has the exact opposite experience, as my requests for the truth of the £43,800 repayment and the long-awaited information on land ownership attest.
"... day to day control of a Chartered Forester" (will carry out planning, design, implementation) and "qualified and experienced contractors will be engaged to implement the proposals..."	The costs of these do not seem to be broken down in any detail in the financial figures shown to the author of this report.
"Match funding and other resources (on which the full funding proposal is dependent) being sought [sic]."	The City will find it difficult at this stage to find matching funding. Campaigners have given this issue great visibility, and the negative public relations value of contributing to anything supporting the cull of the Tullos Hill Roe Deer will harm a company. One funder of Phase 1 indicated it would not fund Phase 2. Another previous funder has not responded to calls on the matter.
(The application contains a table showing various areas by LPID reference).	The author of this report awaits clarification of land ownership. If Tullos in whole or in part is Common Good Land, then the picture will change substantially. The chart also shows that all the LPID references are 'abandoned farmland.' Again, some of Tullos

Draft Application item	Comment
	Hill has never been farmed.

3.2.6. Objections - Financial

“The Tree for Every Resident Project, started in 2009/10, is being delivered on a cost neutral basis.” - Phase 2 public consultation document

Reaching the facts on the project’s finances has been problematic. The Chief Executive Valerie Watts discounts claims made by Ian Tallboys that the scheme will have income from timber. Ms Watts was asked by the report writer in a formal complaint whether or not there was a debt for a previous failed planting. Ms Watts seems to have relied on rhetoric to justify her original evasive answer. Here is a summary of the exchange:-

SK wrote V Watts in initial formal complaint: “I would like to ask: is it true that the Council owes a sum for previous, failed planting? I was told that £44,000 approximately is owed by the City in this regard – please clarify.”

Valerie Watts initial written reply ““Aberdeen City Council does not owe any amount to any organisation relating to a previous failed planting scheme.”

The report writer then obtained a Forestry Commission letter of 2/3/11²³. When confronted with the contents of the 2/3/11 forestry commission letter in writing by SK, Watts replied: “

“The £43,831.90 you refer to does not relate in any way to the current Tree for Every Citizen Project. This as a grant repayment from a previous planting scheme from 1996 which failed due to deer damage and a lack of weed control. This amount was repaid to the Forestry Commission Scotland prior to your enquiry [so at the time of your enquiry dated 20 May 2011, when you asked “if ACC owed £44,000” our response was correct as the re-payment had been made against the 1996 grant payment prior to this date”.

It is the strong contention and firmly held belief of this report writer that there is indeed a relationship between the previous failed tree planting on Tullos Hill grant repayment of £43,800 and the request for clarification of a £44,000 repayment for a previous failed planting on Tullos Hill.

The Forestry Commission letter from Dan Cadle of 2/3/11 reads in part:

“On the 4th November 2010 we issued Aberdeen City Council with an invoice for £43,831.90 - the reclaim of monies paid out under the above contract. This invoice was to be paid within 30 days. The monies have not been received. This invoice is now accruing interest... if you fail to establish these areas of woodland then the council will be liable for a reclaim of up to £120,333.91.”

This is hardly indicative of a cost-neutral scheme.

Other comments on the Financing of this planting scheme include this submission from Pete Leonard:-

. Pete Leonard report of 25/05/10 “Update on A Tree For Every Citizen Project”:

²³ Letter from Forestry Commission to Aberdeen City Council – Appendix

“3. FINANCIAL IMPLICATIONS

This report has no additional funding implications beyond that reported and agreed in the previous report to Housing and Environment Committee on 11th January 2010. The project is on target to deliver within budget. The funding package agreed at the previous committee is as below:-

Estimated overall costs £343,500

Funded by:

- Forestry Commission (Scotland) through SRDP £216,400
- Aberdeen Greenspace £62,000 as matched funding
- In kind contribution by ACC through the Aberdeen Countryside Ranger Service £40,000 to support the on-going community consultation elements of the Planting Programme
- SURF Interreg IVB project up to £25,000 over three years to support the community/volunteer, schools involvement and consultation aspects of the project and to develop linkages with local businesses. This funding is for sites within the SURF project area in the north of the City.
- Contributions from local businesses currently amounting to £2500.

4. Alternative Proposal – retain and enhance existing Tullos Hill meadowland status

The public whether as individuals or community councils do not want this scheme. The Forestry Commission has a soil report which says the establishment of trees on Tullos is unlikely due to the soil, the weeds, wind, and indeed the deer. The City has already returned grant funding for a previous failure on this hill. Only a handful of people, none of whom live in the immediate area (Ms Aileen Malone lives on the other side of Aberdeen) seem to want to press this scheme on an unaccepting public. The hill already supports a variety of life, as evidenced by earlier Aberdeen City Council pamphlets. It is time to see what can be done to help preserve and enhance what Tullos Hill is, and forget plans to try to turn it into something else.

Pete Leonard has written to objectors to say that the meadowlands proposal for Tullos is uneconomical:²⁴

“The area of the site where we are planning to plant trees is not a wildflower rich meadow but area of rank grassland dominated by coarse grasses and the garden escape, dames violet, which is a non native invasive species. As such, the area has minimal biodiversity value. To convert this to a wildflower meadow and manage it as such would be very costly, not sustainable and not subject to the level of grant that would make it economic to undertake in the current financial climate” – Pete Leonard, email, 28 November 2011.

The author of this report is unaware of any study undertaken by Aberdeen City Council or any relevant SNH office on the suitability of Tullos Hill to be a meadowland park (which it de facto already is), and is likewise unaware of any costings or financial reports to support Mr Leonard’s assertions. If such documentation exists, the author of this report would very much like to see it.

²⁴ Pete Leonard to Natasha

The fact is that the people of the area have spoken out in support of the retention of Tullos as it is, and that there are real, quantifiable benefits from designating Tullos as meadowlands, perhaps even a deer park.

4.1. Positives – Governmental policy

A most comprehensive case for meadowland creation and retention is made in the Summary report from Plantlife, *Saving our Magnificent Meadows* (Appendix 12). Rather than re-stating the many benefits which meadows provide, a partial listing is as follows:-

Ecosystem services

Recognising the value of wildflower-rich grasslands to people and the ‘services’ that healthy ecosystems afford us, forms a major part of the argument for securing more financial support for these beautiful habitats.

In June 2011, Defra published the UK National Ecosystem Assessment (UK NEA). This is the first analysis of the UK’s natural environment in terms of the benefits it provides to society and continuing economic prosperity. Its key messages included:

- The natural world, its biodiversity and its constituent ecosystems are critically important to our well-being and economic prosperity, but are consistently undervalued in conventional economic analyses and decision making.
- Ecosystems and the services they deliver underpin our very existence. We depend on them to produce our food, regulate water supplies and climate, and breakdown waste products. We also value them in less obvious ways: contact with nature gives pleasure, provides recreation and is known to have a positive impact on long-term health and happiness.
- The UK’s ecosystems are currently delivering some services well, but others are still in long-term decline. Reductions in ecosystem services are associated with declines in habitat extent or condition and changes in biodiversity.
- The UK population will continue to grow, and its demands and expectations continue to evolve. This is likely to increase pressures on ecosystem services in a future where climate change will have an accelerating impact, leading to more frequent severe weather events with implications for agriculture, flood control and many other services. One major challenge is sustainable intensification of agriculture.
- Recognising the value of ecosystem services more fully would allow the UK to move towards a more sustainable future.

The value to society of functioning wildflower-rich grasslands

Wildflower-rich grasslands are precious and important habitats, contributing many positive ecosystem services . The following points are taken from *Saving our Magnificent Meadows* (either directly where within quotation marks, or are paraphrased by the author of this report):

- **“Storing about 34% of the global stock of carbon** in terrestrial ecosystems, compared with 17% for agro-ecosystems. ‘Improving’ grasslands for agriculture is a significant source of carbon emissions
- **“Ameliorate the impact of flooding** and provide greater water infiltration
- **“Reduced greenhouse gas emissions due to** lower grazing stock densities and limited or no fertiliser input, in contrast to agriculturally improved grasslands
- **“Soil conservation and improvement of water quality by improved nutrient retention**

- **“Increased production** in the absence of fertilisers. One experiment showed a 40% difference in hay yield between species-rich and species-poor plots
- “Evidence is emerging that the species richness of these grasslands not only increases individual ecosystem services, but is required to **maximise a variety of services** within the habitat, such as soil carbon, herbage production, forage quality, and insect richness and abundance”.
- **Biodiversity**
Wildflower-rich grasslands are recognised important biodiversity supports. Tullos has a diverse wildlife population as shown previously in this report. According to Saving our Magnificent Meadows, “

“Many of these species are restricted in their ranges, emphasising the importance of the grassland habitat. These habitats are of considerable importance for breeding and overwintering birds, and as foraging areas for bats. They support a wide variety of moths, spiders, and hoverflies, including UK BAP priority species. According to an index of farmland butterfly abundance compiled by Butterfly Conservation and the Centre for Ecology and Hydrology, the 23 specialist grassland butterfly species have suffered a 36% decline in the period 1990-2009. There are typically at least 15 flowering plant species per square metre of wildflower-rich grassland habitat. Around 82 species of flowering plants of lowland grassland are threatened. Grassland plants account for approximately 28% of all plant species lost from the UK in the past 100 years”²⁵.

- **Bees and Butterflies**
Bumblebees have experienced marked declines in past years. It is not necessary to spell out how essential pollinating insects are. Tullos supports bees and is capable of supporting far more in its current state or as an enhanced meadow than a forest ever could do. Butterfly populations are likewise either falling or in some instances migrating north. Wildflower-rich meadows and long grasses are essential for them.
- **Eco-tourism, art and community**
Grassland habitats help to identify a ‘sense of place’ and community. Wildflower-rich grassland landscapes have been the source of great inspiration to poets, authors, artists and musicians throughout history. Having a grassland this close to the city centre is a benefit, not a burden. Local recreation takes place in the open fields and on the pathways. Eco-tourism is a recognised contributor to the Scottish economy, and the potential for Tullos to be a tourist destination exists. Having access to open green spaces has a positive mental health benefit:-

“(Green areas) provide a much needed space for people to take part in organised or informal sports and provide recreational opportunities for those unable or unwilling to join a gym or leisure centre. We all know that a walk in the park can help clear the mind and the mental health benefits of parks and green space are well documented”. - GreenSpace Online²⁶ - a registered charity which works to improve parks and green spaces by raising awareness, involving communities and creating skilled professionals.

- **Cultural heritage and our history**
Wildflower-rich grasslands often clothe prehistoric earthworks, ancient field systems and this is certainly the case on Tullos Hill, where there are many small Bronze Age cairns – although some have been disturbed, the area is important for understanding of the Bronze Age

²⁵ Saving our Magnificent Meadows, Appendix 12

²⁶ Green Space Online <http://www.green-space.org.uk/index.php>

monuments large and small. Semi-natural grassland is suggested as being about the most benign environment for the preservation of archaeology.

4.2. Positives – Environmental & Cultural

A city losing large tracts of open meadow and grass land in its south should not suffer the loss of further similar local habitat. Many residents objected and were shocked when permission was granted for a 21,000 seat football arena at Loirston; this was after all within the Dee Estuary SAC. The stadium will also ‘glow red in the dark’ which as environmentalists will attest, has a negative effect on feeding and breeding habits of nearly all wildlife. The author of this report is somewhat surprised that the environmental experts and rangers within the City who are so vehement in their pursuit of the Tullos tree scheme were veritably silent when it came to losing the lands at Loirston and Cove.

The following table provides a picture of what the UK currently has in terms of grass and meadowlands – and why it missed its 2010 EU biodiversity targets for this type of ecosystem:-

K. Estimates of the extent of UK BAP Priority Grasslands in the UK²⁷

	Area (ha)				
	England	Wales	Scotland	N. Ireland	Total
Lowland calcareous grassland	38,687	1,146	761	-	40,594
Lowland dry acid grassland	20,142	36,473	4,357	674	61,646
Lowland hay meadows	7,282	1,322	980	937	10,521
Upland hay meadows	870	-	27	-	897
Purple moor-grass and rush pasture	21,544	32,161	6,768	18,476	79,392
Upland calcareous grassland	16,000	700	5,000	936	22,636
Totals for priority habitats	104,525	71,802	17,893	21,466	215,686

Source: UK BAP (2006)

4.3. Local Issues summary

In summary, Tullos is a thriving, diverse meadow supporting insects, plants, trees, small and large mammals and birds. These types of wildlife have seen erosion of habitat, and are about to lose even further ground in this south part of Aberdeen. Pete Leonard may insist (see emails) that Tullos Hill is urban land; as the photographs accompanying this report demonstrate, clearly it is not. It is bad enough it is sandwiched between industrial properties on most of its north border and a road with pollution issues. For it to become another forest (a part of Lochinch land has been given over to tree planting, and there is a forest on part of Wellington Road south of Tullos Hill) in order to meet a re-forestation of Scotland target would be most unfortunate. It should be enough to secure the hill’s future that it has been enjoyed for generations of people who have grown up watching the deer and other wildlife. To further preserve and/or enhance it is clearly what the local residents want – it is also what the existing wildlife needs to survive. A cairn visible within a forest is certainly not the same experience as a cairn on its own on an open hill.

²⁷ Saving our Magnificent Meadows, Appendix 12

5. Conclusions & Recommendations

The author of this report concludes that the residents of Aberdeen oppose the proposed tree planting for its scale, insensitivity to the wishes of those living closest to the hill, and for the manner in which the city intended to obscure the deer cull and the cost of the past failure. A massive tree planting will fail – the soil report confirms this. Culling the deer will only mean more deer move into the area. The cost, side-effects and potential harm caused by 2-3 years of weed control are completely unknown at the time of writing.

The writer is disappointed and seems to have been thwarted and delayed by City Council officers and councillors. The Master of the Mortification Board claims to have no knowledge of the properties he oversees. The City Council Chief Executive seems to have initially used rhetoric to avoid disclosure of the cost of a previous failed planting on Tullos Hill. Almost all requests have not been answered directly, but have been channelled via 'Freedom of Information' officers, including information which should have been readily to hand. The ethics of choosing the 'cheapest' method of tree planting while using the excuse that taxpayer money must be used with 'best value for money' ethos sits uncomfortably with the money so far wasted by not buying the larger tree guards, by failing in weed control on the previous planting, by literally throwing good money after bad by supporting a second attempt in the face of the soil report. Many of those who were asked specific questions about the programme and the cull replied with answers which were general statements about culls, which were inaccurate, and which evaded specifics.

The author of this report is not a recognised environmentalist, but is a researcher who has been in contact with the Forestry Commission, Animal Concern, Scottish SPCA, and Plantlife to name a few organisations. This report and associated research started when the City's position on the cull became public knowledge, and its attempts at silencing debate (ie the refusal of the Housing Committee to hear the author of this report or the duly-elected councillor from Cove) struck the writer, community council leaders and citizens as being highly un-democratic. The writer wishes to thank all those who have assisted with this report.

Recommendations:

- A. That the 'Tree for Every Citizen' scheme with regard to Tullos Hill is halted forthwith .
- B. That the cultural, social and biodiversity importance of Tullos Hill is formally recognised by Aberdeen City Council, Scottish Heritage.
- C. That a committee be created – not involving any city official, ranger or councillor involved in the 'Tree for Every Citizen' scheme to investigate the funding opportunities for enhancing Tullos Hill as meadowland
- D. That signage should be erected informing motorists that deer are in the area; this should be standard practice for any Aberdeen road where deer are known to live near to.
- E. That signage be prominently place on the hill and near its entrances explaining the rules on fire-raising, littering, dog control, etc. These signs should say that the wildlife is not to be harmed in any way.
- F. That an investigation is launched into the quality of answers and information provided by Aberdeen City's Chief Executive to the author of this report. The author of this report will make the entire chain of correspondence available to the City's Audit & Risk Committee
- G. That the financial details of the entire 'Tree for Every Citizen' scheme, all accounts and details of any experts and contractors employed directly or indirectly be reviewed by Audit Scotland and by the Forestry Commission.
- H. As Pete Leonard wrote that the expert proposed to manage the trees without a cull being required had no 'peer review' and that this expert's qualifications were not robust. Therefore

I recommend that the proposals by the City and its hired tree-planting project manager and Pete Leonard be subject to a thorough peer review.

- I. That the Forestry Commission should attend a meeting with Torry Community Council and other community councils in the area (Nigg, Altens) which opposed the cull to gather their first-hand views on whether or not the City engaged in thorough, transparent robust consultation concerning this Phase 2 scheme for Tullos.
- J. That any and all Council supporters of this scheme declare whether they or any of their family, friends or associates have any links who might benefit in any way from the scheme proceeding.
- K. That a further study be carried out to check whether or not the landfill gas situation on the hill is declining.
- L. That the removal of gorse which took place in October 2011 by Alpha Fencing be reviewed – was this a legally-sanctioned time to remove gorse? Was the gorse correctly disposed of by being thrown on top of other living gorse plants?
- M. That any further plans for Tullos Hill be made only in conjunction with Torry, Nigg, Altens & Cove Community Councils, and ideally a representative or two from these areas should be involved in any plans and/or meetings held by the City or the Forestry Commission with regard to Tullos.
- N. That an investigation into the report prepared by Pete Leonard claiming the scheme ‘is cost neutral’ when no funding was secured be reviewed by the City’s Audit & Risk Committee.
- O. The ownership of each tract of land comprising Tullos Hill and the proposed Phase 2 planting area must be verified and made public. If common good land is involved, then the entire project should be subject to more detailed consultation with the community councils.
- P. The accuracy of the draft application for funding must be verified and corrected as necessary. The final application should then be made available for public consultation. Despite the opinion of the Chief Executive as to the public consultation for Phase 2 being ‘robust’, the author of this report, the community councils and the public disagree with that assessment.
- Q. That any future plan for Tullos Hill whatsoever must be carried out with the health and welfare needs of the existing wildlife seen as of paramount importance outweighing financial concern.

In conclusion the author of this report will close with a quote they recently gave to an Aberdeen University student who is writing a paper on Tullos Hill:

***“The more research I do into the ‘tree for every citizen’ phase 2 planting scheme plans for Tullos Hill, the poorer the proponents’ logic becomes. There is a soil report from 2008 which cites reasons for the failure as being soil conditions, wrong size tree guards used (90cm instead of 120cm), weeds, arson – and deer browsing. The soil in parts will leave trees vulnerable to ‘wind throw’. We are talking about a hill adjacent to the North Sea where the winds are exceedingly strong, with two particularly windy days this week alone. This could provide a small clue as to why there isn’t a forest on this exposed hill to begin with. Weighing up these factors, we have chosen the wrong site for 89,000 trees. This is further backed up by the failure of the first attempt at changing this ecosystem with a tree planting: this saw the City Council returning £43,800 in grant money. In fact, the Forestry Commission advises that the City could wind up with exposure of just over £100,000. I ask myself why a cash-strapped local authority like Aberdeen is unable to leave this hill and its valuable ecosystem alone. I have no answers to that question.*”**

***“It is also important for me to mention that the City continually repeats in letters to protestors that ‘deer management is a normal part of forestry management’. First and foremost, there is no forest yet. This concept is repeated in different ways, sometimes*”**

with the insinuation that Tullos cannot support the small herd of roe deer which live on it. The animal experts I have contacted tell me that deer will migrate from place to place; Kincorth Hill being one location linked to Tullos regarding deer movement. But for over 30 years locals tell me they have enjoyed seeing the deer. The deer are in no danger of starving, and in the words of one animal charity worker 'if the hill could not support the deer, then they simply would not be there.' And if the Council persists and culls some 9 deer per year? Quite simply, other deer will move in. We seem to be talking about a herd of 29 deer. If it is not possible to plant 89,000 trees (and what a forest will look like made of trees planted at precisely the same time is another matter) without culling 9 deer per year for several years, then simply: put the trees elsewhere. I agree with the Scottish Society for the Protection of Animals concerning this specific Tullos Situation: they call it 'abhorrent and absurd' to kill deer to protect trees which haven't even been planted. The Scottish SPCA supports culls for reasons of animal welfare such as starvation – so do I; no one wants unnecessary suffering. Do bear this in mind when the Council offer their rhetoric. One important point: for the past year we have been told by the City that this scheme is 'cost neutral.' The fact is they have not got past the draft application stage at this point. I will be issuing a detailed report of my experiences and a call to preserve Tullos within a few days. Finally, many thanks to Councillor Neil Cooney who is joining me in proposing Tullos remain the valuable meadow it is. Councillor Aileen Malone, originally quoted in press releases as a proponent of this scheme has remained silent for some time now. I await her comments on the finances not being in place while the public were told the plan was cost neutral."

APPENDIX

1. Site visit to Tullos Hill landfill site, Aberdeen, 24th November 2008", Forest Research
2. Email to Barry Walton of SITA re gorse removal
3. Bird, Plant and Animal Records from Lochinch and Coastal path area
4. Letter from James Scott, Deer Management officer (SNH), to Richard Nicholson, (ACC), 25 November 2010
5. Report from Pete Leonard to Housing & Environment Committee March 2011
6. Letter of objection to Phase 2 scheme from Torry Community Council to Pete Leonard
7. Letter from Torry Community Council to Pete Leonard originally posted 10 May 2011; re-posted November 2011 and selection of other community council comments
8. Draft application for Case 4381713 from Aberdeen City Council Grampian RPAC region
9. Map of intended planting
10. Letter from Forestry Commission to Aberdeen City Council 2 March 2011
11. Email from Pete Leonard to Natasha Chertwood 2 December 2011 and 28 November 2011
12. Saving our Magnificent Meadows, Plantlife, 2011, Executive Summary
13. Aberdeen City Council's Phase 2 Public Consultation document, ACC Website