

Consultation Report

Prepared for

Angus Council

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Burderop Park
Swindon
SN4 0QD



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Acronyms and Abbreviations

CSG	Client Steering Group
HES	Historic Environment Scotland
LDP	Local Development Plan
SEA	Strategic Environmental Assessment
SEPA	Scottish Environmental Protection Agency
SMP2	Shoreline Management Plan 2
SNH	Scottish Natural Heritage

Introduction

1.1 What is this document?

Angus Council and its partners have consulted with stakeholders throughout the development of the Angus Shoreline Management Plan 2 (SMP2) (see Appendix B to the SMP2) and with the public during a public consultation period.

This consultation report describes how we have consulted with the public during the public consultation stage (19th April 2016 – 24th June 2016) and with the consultation authorities via the Strategic Environmental Assessment (SEA) Gateway, to inform them about the draft SMP2 and associated Environmental Report, and give them the opportunity to comment on the proposed policies.

Section 2 describes what we have done and Section 3 summarises the responses we received and how we are taking account of these in finalising the SMP2.

How we consulted with the public

2.1 What methods were used?

The following methods of consultation were used during the SMP2 public consultation:

- Website
- Hard copies of documents for viewing
- Public events
- Presentation to planners
- Exhibition posters
- Consultation response forms

2.1.1 Website

The Angus Council website (www.angus.gov.uk) hosted information on the SMP2 consultation, consultation events, and downloadable versions of the draft SMP2 consultation documents, appendices and maps.

The public were encouraged to take part in an online Survey Monkey survey linked to the webpage. The survey questions included:

- What is the main reason for your interest in the Angus Shoreline Management Plan?
- Which management unit are you commenting on?
- Do you agree or disagree with the policies presented for this unit and why?
- How useful have you found the draft SMP, supporting documents and materials presented as part of this consultation?
- Any other comments?

44 surveys were submitted, however only 18 of these were complete. 26 were incomplete, providing no useable information.

A consultation response form was also available to download or complete online. A copy of the consultation response form is provided in Appendix A. 20 response forms were received, with a number providing additional attachments of comments for consideration.

2.1.2 Hard copies for viewing

Full hard copies of the Shoreline Management Plan and supporting appendices were temporarily available to view at Angus Council County Buildings in Forfar during the consultation period, between 10.00 and 14.00 Monday to Friday.

2.1.3 Public events and exhibition posters

Three consultation events were held along the SMP2 frontage to provide a forum for the public to come and meet the SMP project team, ask questions and an opportunity to view hard copies of the SMP2 documents. The consultation events were advertised on the Angus Council website and its respective Facebook and Twitter accounts. Locations and dates were as follows:

- Montrose – Monday 30th May 2016
- Carnoustie – Tuesday 31st May 2016

- Arbroath – Wednesday 1st June 2016

A series of exhibition posters were produced by the SMP2 team. The posters showed what an SMP is and why it is needed, how the SMP2 has been developed, the 4 policy options available, details of where further information can be found and how feedback can be given. Copies of these posters are included in Appendix A.

2.1.4 Presentation to planners

A presentation on the SMP2 was given to Angus Council planners at Angus Council offices in Forfar on Wednesday 31 May 2016. The presentation provided a broad overview of SMP2, a copy of which is provided in Appendix B and gave them an opportunity to speak to the SMP2 team, ask further questions and provide comments.

2.2 How did we consider consultation responses?

Written correspondence and consultation response forms were sent to Angus Council, the authority responsible for managing the SMP2. An email address was set up for emailed consultation responses and a survey monkey survey was submitted through the Angus Council website (www.angus.gov.uk).

All consultation responses were collated and reviewed. People who responded received a standard reply from Angus Council. This acknowledged their response and informed them that a formal response document would be produced after the end of the consultation. However, each response received was considered individually.

All responses received were recorded and addressed as detailed below:

- Upon receipt each response was given a unique reference number.
- Details of each response were entered into a Consultation Response Log (e.g. date, name, contact details, area of interest and comment).
- Each comment was considered individually and any actions required were noted.
- At the end of the consultation period the responses were reviewed and categorised according to geographical location.
- Proposed changes to the Plan were reviewed and agreed by Angus Council.
- The agreed changes to policy were discussed with and agreed by the Client Steering Group (CSG) before finalising the SMP and making it available to the public.

How we consulted with consultation authorities

3.1 Scottish government SEA gateway

The Environmental report was submitted to the Scottish Government SEA Gateway on 30 June 2016 and consultation authorities were given until the 12th August to provide comment.

Responses on the Environmental Report were received from Scottish Environmental Protection Agency (SEPA), Scottish Natural Heritage (SNH) and Historic Environment Scotland (HES).

After adoption of the final Plan, Angus Council, as Responsible Authority, will be required to take account of the findings of the Environmental Report and of views expressed upon it during the consultation period. This will be in the form of a 'SEA Statement' which will be distributed to the Consultation Authorities via the Scottish Government SEA Gateway after adoption of the SMP2.

Summary of responses

The following sections provide a summary of general and location specific responses and issues raised during public consultation, as well as the SMP2 Team's comments on these.

4.1 General responses

Below are summaries of general responses and issues raised during public consultation and the SMP2 Team's comments on the responses. These have been split into the following sub-sections.

- SMP2 Policy
- Environment and heritage
- Planning
- Consultation

4.1.1 SMP2 Policy

Several responses were received expressing support for the draft SMP2 policies and / or the draft SMP2 as a whole.

*'Generally sound approach but a difficult balance between accepting natural processes and environmental variation and protecting property and infrastructure. These interests sometimes conflict and require contradictory solutions'. **Representative of a group or organisation***

*'Generally support the policies'. **SNH***

*'Having reviewed the Shoreline Management Plan and associated Policy Statements, I can confirm that we have no objections to the policies proposed'. **Aberdeenshire Council Archaeology Service***

*'Generally, we consider this to be a positive document from the perspective of River Basin Management Planning (RBMP). We are satisfied with the proposed management policies and will be minded of them in our responses to future planning application consultations'. **SEPA***

*'Historic Environment Scotland welcome the preparation of the second shoreline management plan for Angus and recognise the threat posed by climate change and in particular increased coastal erosion on the historic environment resource of Scotland'. **HES***

*'We are mostly satisfied that the Environmental Report (ER) provides a satisfactory assessment of the potential significant environmental effects arising from the Shoreline Management Plan 2 (SMP2)'. **SNH***

SMP2 Team comments

The SMP2 Team would like to acknowledge and welcome the support given for the Angus Shoreline Management Plan 2.

4.1.2 Environment and heritage

Comments from consultation authorities primarily raised concerns over some data presented in the environmental baseline report which is out of date and now superseded and the need for inclusion of further mitigation measures in relation to the historic environment.

'Historic Scotland responded to the scoping consultation on 1 August 2012. Given the length of time that has elapsed since this consultation it is noted that the baseline information for the historic environment has changed since that point. It is noted that the baseline utilised for the assessment

needs to be updated to reflect the current historic environment designations in the study area. Subsequently a number of the findings of the assessment may be required to be reappraised with mitigation and monitoring advice and requirements updated accordingly. **HES**

'There have been some changes to transitional water bodies. In addition, there have been changes in status and objectives for many water bodies, which should be considered.' **SEPA**

In a number of locations, 'continued erosion will have an impact on this historic asset and as such it would be beneficial for the site to be subject to detailed archaeological recording at an early stage prior to further erosion damaging the site'. **Aberdeenshire Council Archaeology Service**

SMP2 Team comments

The SMP2 Team acknowledge that the environmental baseline report, having been written a few years ago now, will need to be updated with new information where appropriate. The further mitigation measures suggested in the responses will also be considered for inclusion in the final Plan.

4.1.3 Planning

The role of the SMP in influencing future development decisions was noted, along with a request by Angus Council to include guidance on development approaches under each policy.

'Tables for each Management Unit do not set out clearly what the approach to development will be within the forecast intervals. It would be useful to include this.' **Angus Council Development Planning**

'The link between preparation of future Local Development Plans and the policy approach outlined in SMP is welcome and noted. It is important that future LDPs do not promote development in areas subject to Coastal Flooding or Erosion where no intervention or protection measures are proposed. The SMP is a material consideration in preparing LDPs and assessing development proposals. Important that the SMP provides clear well illustrated guidance on approach to coastal development in each Management Unit including future predicted coastline.' **Angus Council Development Planning**

'It is vitally important to the success of the Plan to ensure that there should be no new development in the areas at risk and future risk areas.' **SNH**

'Planning has a role to play in reducing overall risk of flooding and erosion by ensuring that inappropriate development does not take place in areas at risk.' **SNH**

SMP2 Team comments

The SMP2 Team will include further guidance on the approach to development under the different policies to aid future planning decisions.

4.1.4 Consultation

The public exhibition events and use of the website were both found to be helpful to some responders and not helpful to others. A number of responses suggested that the public events were not publicised well enough and stakeholders were not involved sufficiently during the development of the plan.

'The proposals appear to have the justification of research and analysis. But community involvement has not been publicised well via recognised media - local press, community facebook page' **Member of Carnoustie community development Trust**

'This is a very important issue for Montrose and should be communicated in the press and social media in order to ensure that a fully representative view is assessed' **Montrose resident**

'We need to involve all interested parties with all stakeholders to find a way that is effective and commercially viable to protect the dunes at Montrose Beach thereby protecting the past assets, the golf courses and housing etc.' **Member of Royal Montrose Golf Club**

'It would be helpful if hard copies could be made available to all interested communities and organisations. At the very least, local libraries should hold a copy for the public to view' **East Haven Together**

SMP2 Team comments

To advertise the consultation and make people aware of meetings, Council officers, in addition to publicising the meetings via social media and the SMP2 website, attended Community Council meetings during the consultation period while notifying others outside of the Coastal burghs and villages. Hard copies of the SMP2 were available to view from the Angus Council offices. The SMP2 Team however, acknowledge that additional advertising and publicising of the events would have been beneficial. These lessons will be taken forward for future consultations.

The SMP2 team included key stakeholders, consultation authorities and environmental bodies whilst developing the draft SMP2. Due to the technical nature of choosing proposed policies, we chose to involve members of the public only once the plan had been developed. The public consultation stage gave local people and other stakeholders an opportunity to have their say on the proposed policies.

4.2 Area specific responses

Below are summaries of area specific responses and associated issues raised during public consultation and the SMP2 Team's comments on the responses. These primarily related to the Montrose Golf links and Rossie Island frontages in Montrose and the East Haven coastal frontage.

4.2.1 Montrose Golf Course

Consultees were concerned with the draft policies in this area. The draft plan is to manage erosion risks to Montrose Golf Course through a managed realignment policy. The main concerns and comments received are summarised below:

- There were a number of comments noting that the importance of Montrose Golf Course as one of the oldest courses in the world and major asset to Montrose is not recognised in the SMP2.
- The SMP neglects to emphasise the importance of the Golf Club dunes as a line of protection to Montrose town.
- The dredged sediment from the South Esk is being taken out of the system and dumped in Lunan Bay, effectively exacerbating the erosion issue at Montrose.
- The majority of responders from Montrose were angered by the perceived lack of action in doing something along this frontage to address the erosion.
- Most agreed that short term intervention is needed to address the erosion issue, suggesting a variety of both hard and soft engineering methods.

SMP2 Team comments

The draft policy for MU1/2 Montrose Golf Links is managed realignment to manage erosion while maintaining the dunes as a line of defence. The SMP2 team has reviewed the consultation responses and we believe that the proposed policy is still appropriate. The policy will help maintain the integrity of the dunes as a natural defence while maintaining protection to the majority of the golf course into the long term through minor works such as recharge of dredged sediment from the South Esk to help reduce erosion rates and through adaptation / relocation of parts of the golf course in the future.

No changes to the draft policies at Montrose Golf Course have been made following public consultation. However, the potential for beneficial use of dredged sediment along the golf frontage through recharge will be highlighted. The importance of the golf club to Montrose and the role the dunes play in reducing flood risk to the northern parts of the town will also be acknowledged in the plan.

4.2.2 Rossie Island

A small number of written responses related to Rossie Island. The policy of hold the line is essentially agreed with in principle, however concern was raised relating to the statement that ‘the responsibility of maintaining these private defences would lie with the associated landowner and not Angus Council’. The main concerns raised included:

- The back of Rossie Island is at risk of erosion and some form of defence is required to help protect the remaining land.
- There is ongoing confusion and discussion over who is responsible for the road and the shoreline.
- The road is at risk of severe erosion during strong storm conditions.

SMP2 Team comments

The draft policy for MU 2/5 Rossie Island is to hold the line by permitting appropriate maintenance of localised private defences through limited intervention, with the responsibility of maintaining defences with the associated landowner and not Angus Council.

This stretch of coastline has a number of land owners, including land held under Common Good, which is managed by Angus Council. Angus Council Officers and Elected Members have met with landowners in this area on a number of occasions highlighting that coastal protection is the responsibility of the landowner, including the Common Good, as per the Coast Protection Act 1949 and not Angus Council as the Coast Protection Authority.

No changes to the draft policies at Rossie island have been made following public consultation.

4.2.3 East Haven

A collective written response was received from the local community group East Haven Together expressing their concern over the implications of a no active intervention policy for East Haven. The main comments raised were as follows:

- The community are undertaking adaptive management measures including marram grass planting on the dunes and this should be recognised through the recommended policy.
- Following the first Angus SMP East Haven residents expressed a wish to be more involved with any future shoreline management planning, this didn't happen.

SMP2 Team comments

The intent of the draft policy for MU6/4 (b) East Haven is to allow natural coastal evolution through a no active intervention policy. Following review of consultation responses and further information submitted during the public consultation, the no active intervention policy at East Haven has been revised.

Evidence put forward by the East Haven Together community group indicates that they currently undertake adaptive management measures to maintain the integrity of the dune system as a natural defence. The SMP2 Team agree that the SMP2 should recognise this valuable work undertaken by the community and should not preclude future limited adaptive intervention under a no active intervention policy. A change to a managed realignment policy would allow the continuation of limited intervention by the local community to conserve and enhance the dunes as a natural defence.

The SMP2 team included key stakeholders, consultation authorities and environmental bodies whilst developing the draft SMP2. Due to the technical nature of choosing proposed policies, we chose to involve members of the public and local communities once the plan had been developed. The public consultation stage gave local people and other stakeholders an opportunity to have their say on the proposed policies.

The following revision to the draft policies has been made as a result of the consultation:

MU6/4 (b) – East Haven – changed to managed realignment (0-20 years; 20 to 50 years and 50 to 100 years).

Appendix A – Consultation Materials

Appendix B – Planners Presentation