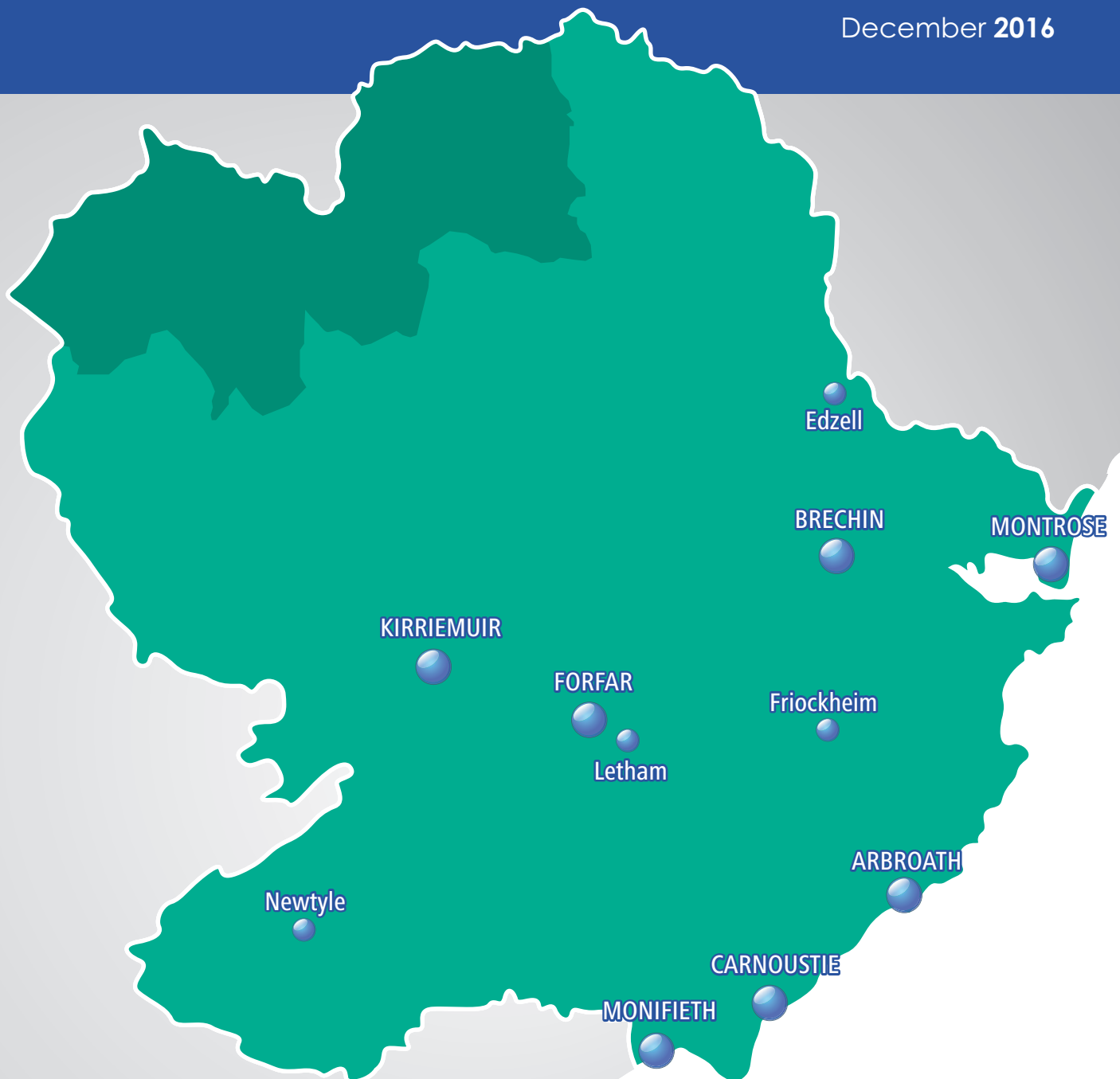


ANGUS LOCAL DEVELOPMENT PLAN

Strategic Environmental Assessment Post Adoption Statement

December 2016



POST- ADOPTION SEA STATEMENT – COVER NOTE

To: SEA.gateway@scotland.gsi.gov.uk

SEA Gateway
Scottish Government
Area 1 H (Bridge)
Victoria Quay
Edinburgh
EH6 6QQ

An SEA Post Adoption Statement is attached for

Angus Local Development Plan

Responsible Authority **Angus Council**

Contact Name Kenneth D McGregor

Job title Senior Planning Officer (Development Plans)

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Signature of Service Manager - Planning	Kate Cowey
Date	28 December 2016

POST-ADOPTION SEA STATEMENT – KEY FACTS

The key facts relating to the adopted Angus Local Development Plan (LDP) are:

Responsible Authority	Angus Council
Title of Plan, Programme or Strategy (PPS)	Angus Local Development Plan (ALDP)
What prompted the PPS	Legislative Requirement The ALDP falls under the scope of the Planning etc (Scotland) Act 2006.
Subject	Land Use Planning
Period covered by the PPS	10 years from the date of adoption of the ALDP (2016-2026)
Frequency of Updates	5 years from the date of adoption
Area covered by the PPS	Angus Council area excluding that part within the Cairngorms National Park Authority boundary. See Map 1 below
Purpose of the PPS	<p>The Angus Local Development Plan (ALDP) is a land-use planning document that will set out the Council's policies and proposals for the development of land across Angus for a period covering at least 10 years from the date of adoption within the strategic context provided by the TAYplan SDP. It will mainly be concerned with the use of land and will guide development to the most appropriate locations.</p> <p>The ALPD will provide clear guidance on the Council's policy on what development will or will not be permitted/supported and where, and will address a wide range of policy issues, including housing, shopping, employment, transport, recreation, and built and natural heritage.</p>
Date adopted	23 September 2016
Contact Name	Ken McGregor
Job Title	Senior Planning Officer (Development Plans)
Address	Environment and Development Plan Team Planning and Place Communities Angus Council County Buildings Market Street Forfar DD8 3LG

Introduction:

This document is the Post Adoption SEA Statement for the Angus Local Development Plan, which was adopted by Angus Council on 23 September 2016. As responsible authority for the Angus LDP, Angus Council has prepared the statement in accordance with Section 18 of the Environmental Assessment (Scotland) Act 2005.

Table 1 below sets out how environmental considerations and issues identified through the SEA process have been taken account of and integrated into the Angus Local Development Plan as adopted.

Table 2 below details Angus Councils response to representations received on the Proposed Angus LDP Environmental Report.

Schedule 1 details the SEA Assessment of new policies incorporated into to the Angus LDP as a result of post Examination Modifications:

- PV21 Pipeline Consultation Zones

Availability of Documents:

Copies of the adopted Angus Local Development Plan, Environmental Report and the Post-Adoption SEA Statement are available to view on the Council's website at:

http://www.angus.gov.uk/info/20307/local_development_plan or at Council Offices located at County Buildings, Market Street and Angus House, Orchardbank Business Park, Forfar, all local libraries, mobile libraries and ACCESS offices in Angus during normal opening hours.

Strategic Environmental Assessment (SEA) Process:

The Angus Local Development Plan has been subject to Strategic Environmental Assessment (SEA), as required by the Environmental Assessment (Scotland) Act 2005. This included the following activities:

- Taking into account the views of the Scottish Environment Protection Agency, Scottish Natural Heritage and Scottish Ministers (Historic Environment Scotland), regarding the scope and level of detail that was appropriate for the Environmental Report.
- Preparation of an Environmental Report on the likely significant effects of the Draft Angus Local Development Plan on the environment, which included consideration of:
 - The baseline data relating to the current state of the environment;
 - Links between the Local Development Plan and other relevant strategies, policies, plans, programmes, and environmental protection objectives;
 - Existing environmental problems affecting the Local Development Plan;

- The Plans likely significant effects on the environment (both positive and negative);
 - Measures envisaged for the prevention, reduction and offsetting of any significant adverse effects;
 - An outline of the reasons for selecting the alternatives chosen;
 - Monitoring measures to ensure that any unforeseen environmental effects will be identified, allowing for appropriate remedial action to be taken.
- Consulting on the Draft Environmental Report;
 - Taking into account the Environmental Report and the results of consultation in making final decisions regarding the Plan;
 - Committing to monitoring the implementation of the Local Development Plan. This will identify any unforeseen significant adverse environmental effects and enable appropriate remedial action to be taken.

The following Table identifies the environmental considerations and issues included in the Environmental Report and how they influenced the form and content of the Local Development Plan.

Table 1: How environmental considerations have been integrated into the Angus Local Development Plan

SEA Topic	Environmental Considerations/Issues Included in the Environmental Report	Integrated into Plan (Yes/No)	How integrated/taken into account or reason for not being taken into account
Biodiversity, Flora and Fauna	<p>Potential impact of development on habitats and species, including international, national and local designated sites and European Protected Species (e.g. otters, bats, dolphins and porpoises). Decline of biodiversity and erosion of wider natural heritage beyond designated sites.</p> <p>Impact of development resulting in fragmentation of habitats and networks/wildlife corridors.</p> <p>Impact of increased pressure for inappropriate development on designated sites and buildings, including ancient and semi natural woodlands.</p> <p>Indirect effects such as disturbance to birds from development pressures for example Firth of Tay & Eden Estuary and Montrose Basin and on species which migrate through estuaries into the river system.</p>	Yes	<p>The Angus LDP includes specific policies to protect and enhance the areas natural environment and biodiversity. Policies PV4 Sites Designated for Natural Heritage and Biodiversity Value and PV5 Protected Species seek to minimise the impact of new development on designated sites, important habitats and protected species. Further information on protected sites and species and their influence on proposed development will be set in a Planning Advice Note.</p> <p>The Angus LDP policies, proposals and land allocations have also been subject to Habitats Regulations Appraisal throughout the Plan preparation process. The HRA process resulted in change to a number of policies and land allocations where it was considered there was potential significant impact on the conservation interests of a European designated site.</p>
Population	<p>Increasingly ageing population means there will be a need to take into account the scope for the provision of an increased level of services and facilities for elderly people and the need for new development to be directed to areas which are accessible by a range of modes of transport.</p>	Yes	<p>The strategy of the Angus LDP directs the majority of new housing and employment development to sites within the larger towns. To reduce the need to travel the ALDP Strategy and Policy DS2 Accessible Development promote development in sustainable locations where a range of services and facilities are accessible by a range of modes of transport. Policy TC8 Community Facilities seeks to encourage the retention and improvement of public community facilities and services to meet the needs of local residents and support the sustainability and viability of communities across Angus.</p>
Human Health	<p>Potential negative effects on the population's health as a result of localised increase in emissions from increased road traffic.</p> <p>Accessibility, quality and distribution of open space, play areas, sports</p>	Yes	<p>To reduce the need to travel and the impact of road traffic on the environment, the Angus LDP Strategy and Policy DS2 Accessible Development promote development in accessible and sustainable</p>

	<p>pitches and playing fields, footpath networks and general amenity areas</p>		<p>locations. Impact of proposed development on air quality identified as one of the criteria included in Policy DS4 Amenity which aims to protect the amenity and maintain and wherever possible improve environmental quality.</p> <p>The Angus LDP includes policies PV2 Open Space Protection and Provision within Settlements and PV3 Access and Informal Recreation to protect and enhance the quantity and quality of accessible and well connected open space which are part of the wider Green Network and contribute towards the amenity and character of the area and are an important sporting, recreational and social resource.</p>
Soil	<p>Potential for irreversible loss of soil through development, contamination or erosion caused by surface water runoff and wind blow – prime quality agricultural land should whenever possible be protected from development. Seek to maximise the redevelopment of brownfield sites and vacant and derelict land. Impact of development on peat deposits and carbon rich soils.</p>	Yes	<p>The strategy of the Angus LDP directs the majority of new housing and employment development to sites within the larger towns. The LDP has sought to prioritise the re-use or re-development of brownfield land. Where this has not been possible a limited number of appropriate greenfield extensions to the main towns have been allocated.</p> <p>Policy PV19 Soils and Geodiversity sets out the councils approach to the protection of prime quality agricultural land, deep peat and carbon rich soils.</p>
Water	<p>Impact of development on quality of watercourses and Water bodies.</p> <p>Drainage capacity and network constraints affect some parts of the Angus towns with parts of the rural area without access to either public drainage or public water supply. Potential pollution issues from increased use of private drainage solutions.</p> <p>Impact of dredging and river realignment on river morphology and river ecology.</p> <p>Indirect effects such as sedimentation and nutrient enrichment in water courses and water bodies such as River South Esk and River Tay.</p>	Yes	<p>The Angus LDP recognises that development can have an adverse effect on the water environment and aims to ensure that new development and regeneration proposals maintain and enhance the quality of all water bodies – ponds, watercourses, water bodies, groundwater and coastal waters.</p> <p>Policies PV14 Water Quality and PV15 Drainage Infrastructure set out the Councils approach to protecting and enhancing the quality of the water environment and managing the collection, treatment and disposal of foul and surface water drainage. Where appropriate development proposals will require to undertake a Drainage Impact Assessment and provide Sustainable Drainage Solutions.</p>
Air	<p>Current air quality in Angus is good with no declared Air Quality Management Areas and no Air Quality Standards exceeded. Air Quality will continue to be monitored. Consider increased traffic</p>	Yes	<p>Impact of proposed development on air quality identified as one of the criteria included in Policy DS4 Amenity which aims to protect the amenity and maintain and wherever possible improve environmental</p>

	<p>movement and potential effect of emissions on air quality in determining scale and location of development through the LDP process.</p>		<p>quality. To reduce the need to travel and the impact of road traffic on the environment, the Angus LDP Strategy and Policy DS2 Accessible Development promotes development in accessible and sustainable locations.</p>
<p>Climatic Factors</p>	<p>Increasing threat to development, proposed and existing, from fluvial and coastal flooding. Careful consideration of flooding issues required in determining the scale and location of future development through the Angus LDP to avoid any exacerbation of current flood problems and potential erosion and loss of coastal habitat.</p> <p>Potential impact of renewable energy development – primarily wind power (both onshore and offshore) with growing interest in hydro (run of river) and proposals for individual turbines and windfarm development in lowland areas.</p> <p>Impact of climate change on the use and management of land.</p> <p>Impact of development on carbon stores e.g. peatland and woodland from windfarm/turbine developments.</p>	<p>Yes</p>	<p>The Angus LDP includes Policies PV12 Managing Flood Risk, PV13 Resilience and Adaptation and PV16 Coastal Planning which set out the Councils approach to the avoidance and mitigation of flood risk in new and existing development (including potential coastal flooding and erosion) in assessing and determining development proposals. All land allocations and opportunity sites were assessed against the Flood Risk Framework and Flood Risk Maps. The Proposed LDP was supported by a Strategic Flood Risk Assessment.</p> <p>The Angus LDP includes Policy PV9 Renewable and Low Carbon Energy Development which sets out the Councils approach to considering proposals for renewable and low carbon energy development. The policy will be supported by supplementary guidance which will set out a spatial framework to guide the location of onshore wind farm developments and detail the factors to be taken into account in developing and determining proposals for all types of renewable energy development.</p> <p>Policy PV19 Soils and Geodiversity sets out the councils approach to the protection of prime quality agricultural land, deep peat and carbon rich soils.</p>
<p>Material Assets</p>	<p>Constraints on infrastructure delivery including the current economic climate.</p> <p>Potential impact of development on recreation and open space</p> <p>Use of scarce natural resources including minerals and the loss of prime quality agricultural land.</p> <p>Lack of planned green networks within and connecting settlements.</p>	<p>Yes</p>	<p>The Angus LDP includes policies PV2 Open Space Protection and Provision within Settlements and PV3 Access and Informal Recreation to protect and enhance the quantity and quality of accessible and well connected open space which are part of the wider Green Network and contribute towards the amenity and character of the area and are an important sporting, recreational and social resource.</p> <p>Policy PV1 Green Networks and Green Infrastructure sets out that the Council will seek to protect, enhance and extend the wildlife, recreational, amenity, landscape, access and potential flood management value of the Green Network. A Planning Advice Note will be prepared to set out the location and function of green and blue</p>

			networks in Angus.
Cultural Heritage	Impact of increased pressure for development on sites of cultural, historical and archaeological importance, such as battlefields and historic landscapes, listed buildings, conservation areas, scheduled ancient monuments and areas of archaeological interest.	Yes	The Angus LDP includes Policy PV8 Built and Cultural Heritage which is designed to ensure protection and wherever possible enhancement of areas designated for their built and cultural heritage value. The policy affords protection of Scheduled Monuments, Listed Buildings, Conservation Areas, Sites of Archaeological Interest and Gardens and Designed Landscape inventory sites. This policy will be supported by a Planning Advice Note which will be prepared on Planning and the Built and Cultural Heritage.
Landscape	<p>Increased pressure for new development (including housing in the countryside) could adversely affect the landscape of Angus including the setting of its towns and villages.</p> <p>Poor settlement edge design which is not integrated into the landscape and development outwith the capacity of the landscape to accommodate it.</p> <p>Current development forces and pressures leading to change in the landscape are:</p> <p>Change in agricultural practices Forestry and woodlands development pressures in and around settlements and the Angus countryside. Development in the countryside Windfarms Mineral extraction Tourism Climate change</p>	Yes	<p>The Angus LDP includes Policy PV6 Development in the Landscape which seeks to protect and enhance the quality and diversity of the landscape in Angus, its distinctive local characteristics and its important views and landmarks. Development proposals will be considered within the context of relevant landscape capacity studies, designated landscape areas. The potential landscape impacts of specific types of development is addressed in more detail in other policies in the plan (e.g. Policy PV9 Renewable and Low Carbon Energy Development) and supporting Supplementary Guidance prepared for Countryside Housing, Renewable and Low Carbon Energy Development. All land allocations, particularly greenfield extensions to existing settlements, included in the LDP were assessed for their potential effect on local landscape character in the context of the Angus Landscape Capacity Study which was prepared to support the site assessment process.</p> <p>To assist in securing and delivering development which is well designed and sympathetic to local landscape and townscape character the Angus LDP includes Policy DS3 Design Quality and Placemaking. This will be supported by supplementary guidance.</p>

The following table presents a summary of the comments or representations received on the Environmental Report prepared and published in tandem with the Proposed Angus Local Development Plan and details Angus Councils response to the representations and any action required.

Table 2: Schedule of Representations to the Proposed Angus Local Plan Environmental Report and Angus Council Responses

Organisation	Comment	Angus Council Response	Action
Scottish Environment Protection Agency (SEPA)	<p>We are satisfied that the Environmental Report (ER) provides a good general assessment of the likely significant environmental effects of the Angus Local Development Plan (ALDP) Proposed Plan (PP). Subject to the detailed comments below we are generally content with the assessment findings.</p> <p>We are satisfied that most of our comments on the Draft Environmental Report (i.e. MIR ER) have been taken into account and welcome the summary of the actions taken by the Council in Appendix 2.</p> <p>We welcome the approach taken by Angus Council (AC) in presenting directly in the PP the findings of the SEA for each of the policies and each of the sites development requirements. This adds to the transparency of the process and allows for easier cross-reference with the ER, therefore making the SEA more accessible to the public. We note that the scoring provided is related to the residual effects and therefore assumes that the mitigation measures will be implemented. We also welcome the audit trail of how the mitigation/enhancement measures have been taken into account and resulted in changes to the PP. This is made available through Appendices 4 and 5.</p> <p>We however note that the detailed site assessment and policy assessment documents were not initially available in the AC website. Once requested, the information and the documents have been published, although we considered these documents not easy to find in the website. We have used the detailed assessment, in addition to the information available in Appendix 4 and 5 and the results in Table 5 and 6, to consider the assessment results for issues within SEPA’s remit. Detailed comments are available in Section 6 of this response and they have been cross-referenced, where relevant, in our separate response to the PP.</p>	<p>General support welcomed.</p> <p>Note comment regarding availability of detailed site assessments.</p>	<p>No action required.</p>

Historic Scotland (HES)	<p>We welcome that our previous comments on the environmental report accompanying the Main Issues Report have been acted upon and this response should be read in conjunction with our comments issued to that consultation. The updated environmental report clearly sets out the approach to the assessment and the detailed site assessments provided are particularly welcome. It is clear that these assessments have informed the content of the plan and it is again to be welcomed that summary assessment findings have been presented in the body of the plan itself, making the environmental issues surrounding policies and sites clearly transparent to the reader. As a general point regarding the detailed site assessments, in some cases the mitigation for a negative impact indicates that the post mitigation outcome will be positive. We feel that in most cases this is more likely to be neutral in nature (unless the mitigation is going beyond the avoidance of harm and is improving the baselines condition). However, I am content to agree that there is unlikely to be negative residual effects on historic environment assets upon delivery of appropriate mitigation.</p>	<p>General support welcomed. Note comment regarding scoring in detailed site assessments.</p> <p>Agree that in most instances impact is likely to be neutral rather than positive.</p>	<p>Detailed site assessments and scoring reviewed for impact on the Historic Environment. Amendment made to scoring as appropriate.</p> <p>Policy A14: Built and Natural Environment – Hospitalfield House. Cultural Heritage Factor of SEA Implications Table amended from + to 0.</p>
SEPA	<p>Introduction and Non-Technical Summary We are satisfied with the content of the NTS and have no comments to add on the introduction.</p>	<p>Support welcomed.</p>	<p>No action required.</p>
SEPA	<p>Angus Local Development Plan Context We are content with the context provided for Angus and welcome the relation to TAYplan, NPF3 and SPP. Please note that in Table 2 the section on air quality refers to a report that was written in 2010. We note that these reports are produced annually; therefore a more recent report should be referenced.</p>	<p>Agree it would be useful to provide information based on the most up to date available assessment of Air Quality in Angus.</p>	<p>Table 2 in Air Quality Section updated to reflect most up to date available Angus Council Report on Air Quality.</p>
SEPA	<p>The Angus Environment - We are generally content with the description of the state of the environment and the associated environmental problems. We welcome the consideration of air quality issues under the heading of Human Health (Section 3.10). Air quality is also considered in Section 3.16 where it states ‘Although air quality in Angus currently meets appropriate air quality standards and there are no Air Quality Management Areas there remains the potential for air quality to deteriorate as a result of local increase in emissions from increased road traffic movements.’</p>	<p>Support welcomed. Support welcomed.</p>	<p>No action required. No action required.</p>

SEPA	<p>We would have welcomed further comments related to problems that commuter traffic (from Angus) can cause along the commuter routes into Dundee. We raised this issue at MIR stage and note that in Appendix 2, the AC response is: ‘Spatial strategy and house completion targets set by TAYplan and covered by the TAYplan ER. No follow up actions for AC to consider in Air set out in Action Programme. No mitigation set out in TAYplan ER’. We are disappointed to see that this opportunity to acknowledge what we consider to be a cumulative effect of the LDP has been missed. Please note that we have raised this issue in our response to the ER of TAYplan2. We consider that the effects that are relative to neighbouring authorities could be highlighted and addressed with a more integrated approach.</p>	<p>Comment noted. The Angus LDP requires to conform to the approved TAYplan Strategic Development Plan and has allocated development land to meet the full housing and employment land requirements set out in TAYplan. Such cross boundary issues should properly be considered in undertaking Strategic Environmental Assessment during preparation of the Strategic Development Plan. Note that SEPA has made representation on this issue in response to the Environmental Report for TAYplan 2.</p>	<p>No action required.</p>
Scottish Natural Heritage (SNH)	<p>Current state of the environment Soils (page 14): we recommended additional baseline information on the extent and nature of Angus’s soil resource as this is a significant environmental issue for the LDP. We aim to publish the final version of SNH’s Carbon and Peat map in June. The consultation document is available at: http://www.Snh.Gov.Uk/docs/A1495150.Pdf</p> <p>The map uses data which is already in the public domain and when finalised will identify the location and extent of the nationally important resource of carbon rich soils, deep peat and priority peat land habitat. We recommend this information is added to the baseline for Angus.</p>	<p>Agree it would be useful to incorporate additional baseline information on the extent and nature of the soil resource in Angus, particularly carbon rich soils, deep peat and priority peat land habitat.</p>	<p>Soils section of Current State of the Angus Environment (page 14) reviewed and amended to reflect publication of the SNH Carbon and Peat Map.</p>
SNH	<p>Environmental problems - We appreciate the incorporation of recommendations we made in our scoping response and have no further comments.</p>	<p>Comment noted.</p>	<p>No action required.</p>

<p>SNH</p>	<p>Habitats Regulations Appraisal (HRA, page 13): We support the HRA being undertaken in parallel with the SEA, and where required the application of mitigation measures to policies and site proposals which are then assessed through SEA. It would be helpful to identify these policies and sites in the recording of the environmental effects, with the ER making clear the outcome of the HRA process regarding impacts on these European sites.</p>	<p>Comment noted.</p> <p>Agree that the outcome of the HRA process and resultant amendment to Policies in the Proposed Plan should be reflected in the Environmental Report.</p>	<p>Summary of Environmental Implications of the Proposed ALDP Section, Appendix 4: Policy Framework Impacts and Mitigation, and Appendix 5: Settlement Strategy Impacts and Mitigation amended to reflect the outcome of the HRA process regarding impacts on European designated sites.</p>
<p>SEPA</p>	<p>Assessment Methodology - We note that a neutral or positive impact was predicted for the policies and where some negative effects were identified the mitigation consisted in a change in the wording which then resulted in neutral or more positive effects. We welcome this approach and are largely content with the results of the policies environmental assessment. Please note that we have requested some changes in the policies wording as part of our response to the PP. Please see detailed comment in Section 6 of this response (Appendices).</p> <p>We note that most of the negative effects are related to the loss of prime agricultural land which cannot be mitigated due to the need to meet development land requirements in Angus. The loss has been minimised by promoting the reuse and regeneration of appropriate brownfield sites and we welcome this. We also agree with the identification of negative effects for localised flooding impacts and have actually identified and made comments on further flood risk and requested Flood Risk Assessments (FRA) as a mitigation measure. We note the flood risk has been considered in the assessment under the SEA Topic of Climatic Factors. This is on the basis of new information</p>	<p>Support welcomed. Representations regarding detailed wording dealt with through Schedule 4's for submission to the Scottish Ministers/DPEA for consideration through the LDP Hearing process. Where appropriate Angus Council has suggested amendment to Policy wording through Non-Notifiable Modifications (NNM's) which will be submitted to the LDP Hearing for consideration by the Reporter(s).</p> <p>Comment noted.</p>	<p>No action required.</p> <p>No action required.</p>

available to SEPA and it is related to the sites for which AC has requested SEPA's comments.

We welcome Figure 1 in page 49 (Cumulative impacts of the Proposed ALDP Policies) however we consider that this does not address cumulative effects, but only represents in a bar chart the percentage of scoring for the different SEA objectives. This is useful in order to understand the overall effects of the policies, however it does not show the cumulative effects resulting from the different policies, i.e. Where the different policies do together bring additional effects.

We cannot find reference to cumulative, secondary or synergistic effects in relation to the sites. Often these types of effects are related to air quality issues and emissions related to traffic and transport arising from the location of the sites. In particular we consider a cumulative effect the additional traffic generated by new development on the commuter route to Dundee

Comment noted. Agree that further interpretation of the SEA Assessments for Policies and Sites set out on Tables 5 and 6 is required to address potential cumulative, secondary or synergistic effects.

As set out in the response to representation PP/00120/2/004 (page 3) the Angus LDP requires to conform to the approved TAYplan Strategic Development Plan and has allocated development land to meet the full housing and employment land requirements set out in TAYplan. Such cross boundary issues should properly be considered in undertaking Strategic Environmental Assessment during preparation of the Strategic Development Plan. Note that SEPA has made representation on this issue in response to the Environmental Report for TAYplan 2.

SEA Assessments for Policies and Sites reviewed and the Summary of Environmental Implications of the Proposed ALDP section amended. Additional text incorporated to address potential cumulative, secondary or synergistic effects.

SNH

Assessment of significant environmental effects. We welcome the clearly presented SEA summary matrices and scoring (++/+/0/--/?) for both the LDP policies (page 37), and settlement allocations (page 39). This transparent approach to recording the environmental impacts and mitigation required as set out in Appendix 5 is supported. The ER should also state whether the scoring is post or pre-mitigation, and any residual effects post-mitigation.

Comment noted.
Agree to indicate that the scoring relates to pre or post-mitigation stage and where appropriate any residual effects following mitigation.

Paragraph 5.7, page 35 amended to indicate that the detailed scores on Tables 5 and 6 reflect the position at the post mitigation stage and have been drawn from the detailed policy and site assessment tables.

	<p>We note that a neutral or positive impact was predicted for the 45 policies assessed, with no significant negative/negative impacts recorded (NTS, section 11). We are generally content with the accuracy of recording significant effects for these policies. We recognise the difficulty of assessing the environmental effects of more generic policies which make provision for development - for example within settlement boundaries - and which have led to scoring of uncertainty e.g. DS1. However, where development is supported, for example in TC2 for both settlements and countryside areas, or TC15 Employment Development, we suggest the scoring of a positive effect for biodiversity, soils and landscape should be amended to uncertain or minor negative to more accurately reflect potential environmental impact. Likewise Policy TC16 Town Centres is recorded as having minor positive effect on soils but this is more likely to be '0.'</p>	<p>Review scoring for biodiversity, soils and landscape in detailed assessment for Policies TC2 Residential Development and TC15 Employment Development. Scoring for Policy TC16 Town Centres considered appropriate as the policy intention is to focus development in Town Centres rather than on peripheral sites, including greenfield employment or business sites. Such an approach is considered likely to limit land take and therefore have a minor positive effect.</p>	<p>Individual site assessments and scoring reviewed and amended as appropriate.</p> <p>Policy TC2: Soil Factor in SEA Implications Table amended from + to +/-.</p> <p>Policy TC15: Biodiversity, Flora & Fauna and Landscape Factors in SEA Implications Table amended from + to +/-.</p> <p>No change to Policy TC16.</p>
	<p>Policy PV9 Renewables: this is scored as major positive effects for designated sites and European Protected Species, soils (5d and e), and landscape (18a) but we suggest this should be recorded as uncertain.</p>	<p>Review scoring for biodiversity, soils and landscape in detailed assessment for Policy PV9 Renewables. The assessment was conducted on the basis that PV9 and related policies of plan aim to protect and wherever possible improve natural heritage interests of Angus. While it is accepted that the short term effects are likely to be neutral it is also considered that in the longer term renewable energy development is likely to reduce production of CO2 and greenhouse gases and contribute to reducing the effects of climate change. This should result in some positive effects on natural heritage.</p>	<p>Assessment for Policy PV9 and scoring reviewed. No change.</p>
<p>SEPA</p>	<p>DS 4 – Amenity - We agree with the assessment, and we welcome the comment: 'policy sets out that the Council will resist development which has an unacceptable adverse impact on air quality'. Please see</p>	<p>Support noted</p>	<p>No action required.</p>

	our comments on the PP.		
SEPA	<p>TC 9 – Safeguard of land for cemetery use - We understand that these have been assessed under this policy heading even though they relate to specific sites. Please note that we made a representation for a modification to TC9 Liff in our PP response to have a FRA carried out. In addition, we consider that the SEA assessment should have considered the effects on groundwater as cemeteries can have a detrimental impact on this. Therefore rather than neutral the effects should have been unknown. For all of the cemeteries we have made comments in our response to the PP in respect of the water environment.</p>	<p>Agree to review the individual site assessments in the SEA to ensure consideration of the potential effects of cemetery development and use on the water groundwater and the wider water environment.</p> <p>Representation regarding detailed wording of Policies TC9, A13, B7, C9, F11, K4 and M10 dealt with through appropriate Schedule 4 for submission to the Scottish Ministers/DPEA for consideration through the LDP Hearing process. Angus Council has suggested amendment to Policy wording through Non-Notifiable Modifications (NNM's) which will be submitted to the LDP Hearing for consideration by the Reporter(s).</p>	<p>Review Policy and site assessments and amend scoring as necessary from Neutral to Unknown.</p> <p>Policy TC9: Water Factor in SEA Implications Table amended from 0 to ?.</p> <p>Policies A13, B7, C9, F11, K4 and M10: Water Factor in SEA Implications Tables amended to ?.</p>
SEPA	<p>TC 12 – Freight facilities – We note that the assessment has identified neutral effects for Climatic Factors, however, as this relates to a particular location in Montrose, we know that this site is located in or adjacent to the functional flood plain or an area potentially at flood risk. We therefore asked for a FRA in the PP response and this should be reflected in the SEA assessment.</p>	<p>Review the site assessment for the site in Montrose in relation to potential flood risk.</p> <p>Representation regarding detailed wording dealt with through Schedule 4 for submission to the Scottish Ministers/DPEA for consideration through the LDP Hearing process. Where appropriate Angus Council has suggested amendment to Policy wording through Non-Notifiable Modifications (NNM's) which will be submitted to the LDP Hearing for consideration by the Reporter(s).</p>	<p>Site assessment and scoring reviewed and amended as appropriate.</p> <p>Policy TC12: Climatic Factors in SEA Implications Table amended from + to 0/+.</p>

SEPA	PV 12 – Managing Flood Risk - We agree with the detailed assessment (Climatic Factors significant positive effects ++) and understand from Appendix 4 that no further mitigation/enhancement, in addition to the wording already changed to the policy as part of the policy development, will be required. Please note that we have made a representation for a modification of the wording of the policy that will result in even more positive effects and therefore this can be considered an enhancement measure.	Comment noted. The scoring system does not allow the score to be increased beyond ++ - significant positive effect.	No change required.
SEPA	PV14 – Water Quality - We agree with the detailed assessment (Water significant positive effects ++) and understand from Appendix 4 that no further mitigation/enhancement, in addition to the wording already changed to the policy as part of the policy development, will be required. Please note that we have made a representation for a modification of the wording of the policy that will result in even more positive effects and therefore this can be considered as an enhancement measure.	Comment noted. The scoring system does not allow the score to be increased beyond ++ - significant positive effect.	No change required.
SEPA	PV15 – Drainage infrastructure - We agree with the detailed assessment (Water significant positive effects ++) and understand from Appendix 4 that no further mitigation/enhancement, in addition to the wording already changed to the policy as part of the policy development, will be required. Please note that we have made a representation for a modification of the wording of the policy that will result in even more positive effects and therefore this can be considered an enhancement measure. In particular we raised the issue related to private drainage where there is no capacity in the existing sewer system.	Comment noted. The scoring system does not allow the score to be increased beyond ++ - significant positive effect.	No action required.
SEPA	PV17 – Waste Management Facilities – The detailed assessment gives a positive score to the SEA objectives related to the SEA Topic of Material Assets (waste). Please note that we made a representation in our PP response to include storage and distribution in the policy and to make reference to the SEPA’s Thermal Treatment of Waste Guidelines 2014.	Comment noted. Representation regarding detailed wording dealt with through Schedule 4 for submission to the Scottish Ministers/DPEA for consideration through the LDP Hearing process. Where appropriate Angus Council has suggested amendment to Policy wording through Non-Notifiable	No action required.

	Modifications (NNM's) which will be submitted to the LDP Hearing for consideration by the Reporter(s).
<p>SNH</p> <p>Settlement strategies - As for the policies, we are generally content with the recording of significant environmental effects from development through land allocations. We note the key negative impacts identified are loss of prime agricultural land, landscape and localised flooding impacts (Non Technical Summary section 12). We also note that loss of prime agricultural land cannot be mitigated and have commented on this under cumulative effects below.</p> <p>We feel that on a few occasions that negative effects have been under-recorded, and have provided some examples below. The commentary provided in Appendix 5 is very helpful in identifying key issues and setting out mitigation measures. We feel that mitigation could have gone further for some sites where required, such as recommending a reduction in the allocation area, or recommending alternatives on the basis of likely significant effects identified through the SEA assessment process.</p>	<p>Support welcomed. No action required.</p> <p>Comments noted. No action required.</p> <p>Potential landscape and visual impacts of development sites was considered in establishing the Options consulted on at the MIR stage. In preparing the proposed plan potential impacts were considered in more detail taking into account the Angus Settlements Landscape Capacity Study 2015 (initial settlements published December 2014). Where appropriate site allocations include necessary mitigation and landscaping required to address potential impacts. This will require to be addressed through the development management process. It is not considered appropriate to simply exclude some areas from site boundaries but to address potential landscape and visual impacts through the design of the development and any necessary landscaping.</p>

	<p>Allocations C1 and C7 - as these sites have the potential to generate landscape and visual impacts, we recommend the scoring is revised from 'neutral/negative' to record 'negative' effects. These impacts are recorded in Appendix 5 (page 113/4), and for these cases mitigation could have proposed the modification of the site boundaries.</p>	<p>Agree to review site assessments for Sites C1 and C7 regarding potential landscape and visual impacts.</p>	<p>Review individual site assessments and amend scoring as appropriate.</p> <p>Policy C1: Landscape Factor in SEA Implications Table amended from + to 0.</p> <p>Policy C7: No change.</p>
SEPA	<p>A1 - We welcome the flood risk assessment. We note that Water has a neutral and positive score, but the site assessment stated that 'no link to a designated water as identified in the relevant RBMP'. As mentioned in our PP response, we recognise multiple RBMP pressures on the adjacent watercourse – morphology, suds, sewage; diffuse and point source pollution, culverting, channel re-alignment and these raise concerns. Also, natural flood management/green network proposals require to be understood to avoid any possible conflict with RBMP objectives. We therefore consider that further mitigation is required.</p>	<p>Review detailed site assessment to ensure that proper regard is taken of SEPA comments in relation to the RBMP pressures on the adjacent watercourse.</p> <p>Representations regarding site A1 dealt with through Schedule 4 for Issue 14 Arbroath for submission to the Scottish Ministers/DPEA for consideration through the LDP Hearing. Following consideration of the representation no change is proposed to Policy A1.</p>	<p>Site assessment and scoring reviewed. No change.</p>
SEPA	<p>A3 - We welcome the assessment and note that the mitigation has been incorporated in the developer requirements.</p>	<p>Support welcomed.</p>	<p>No action required.</p>
SEPA	<p>A6 -The site assessment states that for Climatic Factors 'there are flood issues relating to this site which will restrict its development potential but should not effect on flooding elsewhere.' Water - 'There is no direct link to designated water as identified in the relevant RBMP'. The A6 SEA Implications in the settlement statement of the PP give a neutral score to Water and a positive to Climatic Factors. We disagree with these results and have requested in the PP response that the site is removed on the basis of flood risk or the use is changed. We also consider that pressures are identified on the adjacent Elliot Water in the context of River Basin Management Planning (RBMP) - these are: buffer strips, SUDS, foul drainage,</p>	<p>Review detailed site assessment to ensure that proper regard is taken of SEPA comments in relation to the RBMP for the River South Esk.</p> <p>Representations regarding removal of site A6 dealt with through Schedule 4 for Issue 14 Arbroath for submission to the Scottish Ministers/DPEA for consideration through the LDP Hearing. Angus Council has suggested</p>	<p>Site assessment and scoring reviewed. No change.</p>

	ecological pressures. We would therefore welcome if the AC identifies opportunities for improvement of the water environment as part of the mitigation/enhancement measures.	amendment to wording of Policy A6 regarding protection of the water environment through Non-Notifiable Modification (NNM) which will be submitted to the LDP Hearing for consideration by the Reporter(s).	
SEPA	A13 -The site assessment gives a positive (+) score to Climatic Factors and states: ‘the allocated site is affected by limited surface water issues but only within the landscaped area. Potential benefit in slowing fluvial flow in the Hercules den to the Brothock water possibly reducing flood risk downstream’. We consider that flood risk from the Hercules Den Burn should be assessed with a FRA as explained in our PP representation for this site. In addition we note that Appendix 5 page 109 states that the development of this site for a cemetery will have limited environmental impact. Please note that cemeteries can have a detrimental impact on groundwater however it is difficult to determine the impact without intrusive ground investigation. The site assessment correctly identifies unknown effects (U or ?) for Water, but there is no reference in the comments to groundwater issues and in general it is not clear what causes this scoring. The unknown effects could be mitigated by following the advice provided in our PP representation for this site.	Review detailed site assessment to ensure that proper regard is taken of SEPA comments in relation to potential adverse effects on groundwater. Representations regarding site A6 dealt with through Schedule 4 for Issue 14 Arbroath for submission to the Scottish Ministers/DPEA for consideration through the LDP Hearing. Angus Council has suggested amendment to wording of Policy A13 regarding requirement for Flood Risk Assessment through Non-Notifiable Modification (NNM) which will be submitted to the LDP Hearing for consideration by the Reporter(s).	Site assessment and scoring reviewed and amended. Policy A13: Water Factor in SEA Implications Table amended from ?/0 to 0.
SEPA	B4 – The B4 SEA Implications give a neutral score for Water, however we consider that pressures are identified on the adjacent Dens and Barries Burns in the context of RBMP which should be addressed. The scoring was originally negative but after mitigation it became neutral, however there is no mention of RBMP issues in the site assessment. We do note however that there is reference to the policy for the protection of the water environment. Please see our PP response for further details which requires a modification to the developer requirements.	Review detailed site assessment to ensure that proper regard is taken of SEPA comments in relation to the RBMP for the River South Esk. The representation regarding detailed wording of Policy B4 has been dealt with through the Schedule 4 for Issue 15 – Brechin for submission to the Scottish Ministers/DPEA for consideration through the LDP Hearing process. Following	Site assessment and scoring for Policy B4 reviewed. No change.

		<p>consideration of the representation no change is proposed to Policy B4.</p> <p>Issues relating to impact on the wider water environment were considered in the Schedule 4 for Issues 11 – Water Environment. Following consideration of representations no change is proposed to Policy PV14 Water Quality.</p>	
SEPA	<p>B5 – The site assessment states for Water (neutral score) that ‘there is no direct link to a designated water body as identified in the relevant River Basin Management Plan’ and for Climatic Factors (positive score) that ‘the site is not thought to be at risk from flooding and there is no known requirement to alleviate existing flooding problems’. We disagree with this assessment as pressures are identified on the adjacent Dens Burn in the context of RBMP – these are: SUDS, morphological pressures, culverted Dens Burn (this could have been identified under Water). There is also flood risk related to this site as the Brechin Flood Protection Scheme which will be adjacent to this site with a culvert adjacent to the site which will form part of the Scheme. In our PP response we have requested a modification to take this into consideration.</p>	<p>Review detailed site assessment to ensure that proper regard is taken of SEPA comments in relation to the RBMP for the River South Esk.</p> <p>The representation regarding detailed wording of Policy B4 has been dealt with through the Schedule 4 for Issue 15 – Brechin for submission to the Scottish Ministers/DPEA for consideration through the LDP Hearing process. Following consideration of the representation no change is proposed to Policy B5.</p>	<p>Site assessment and scoring for Policy B5 reviewed. No change.</p>
SEPA	<p>B6 – The site assessment identifies positive scoring (after mitigation from neutral) and states ‘no flood risk apparent at this site, however records indicate occurrence of surface water flooding. The LDP contains other policies which seek to protect and enhance the water environment including the promotion of SUDs which will apply at the Development Management stage. Policy requires submission of Drainage Impact Assessment’. We note that this site is located in or adjacent to the functional flood plain or an area potentially at flood risk and therefore we consider the scoring in the assessment to be incorrect and have requested a modification in our PP response to have a FRA included as a developer requirement.</p>	<p>Comment noted.</p> <p>Representation regarding detailed wording of Policy B6 dealt with through Schedule 4 for Issue 15 - Brechin for submission to the Scottish Ministers/DPEA for consideration through the LDP Hearing process. Angus Council has suggested amendment to Policy wording through Non-Notifiable Modifications (NNM’s) which will be submitted to the LDP Hearing for consideration by</p>	<p>No action required.</p>

		the Reporter(s).	
SEPA	C2 – The site assessment states that ‘the development site is not thought to be at risk from flooding and there is no known requirement to alleviate existing flooding problems’ (Climatic Factors) and unknown effects have been identified. The site is subjected to surface flood risk and therefore we consider the assessment results to be negative. Please note that in the PP response we have asked for a modification to the development requirement to request a Drainage Impact Assessment (DIA).	Comment noted. Representation regarding detailed wording of Policy C2 dealt with through Schedule 4 for submission to the Scottish Ministers/DPEA for consideration through the LDP Hearing process. Angus Council has suggested amendment to Policy wording through Non-Notifiable Modifications (NNM’s) which will be submitted to the LDP Hearing for consideration by the Reporter(s).	No action required.
SEPA	C5 – The site assessment states that ‘the development site is not thought to be at risk from flooding and there is no known requirement to alleviate existing flooding problems’(Climatic Factors) and unknown effects have been identified. We know, however, that there is a great deal of uncertainty associated with the flood extents of the Barry Burn and consider this to be a negative or unknown effect that needs mitigation. Please note that in the PP response we have asked for a modification to the development requirement to include a FRA.	Comment noted. Representation regarding detailed wording of Policy C5 dealt with through Schedule 4 for submission to the Scottish Ministers/DPEA for consideration through the LDP Hearing process. Angus Council has suggested amendment to Policy wording through Non-Notifiable Modifications (NNM’s) which will be submitted to the LDP Hearing for consideration by the Reporter(s).	No action required.
SEPA	F3 – The site assessment states (Climatic factors (0/+)) that ‘the allocated is not thought to be at risk from flooding and there is no known requirement to alleviate existing flooding problems. The LDP allocation still requires development proposals to submit a Drainage Impact Assessment and a Sustainable Drainage and Surface Water Management Plan’. However review of the surface water 1 in 200 year flood map indicates that there may be flooding issues on the site. Other information in our possession in relation to a development management application also makes us consider this site at risk of flooding and therefore have requested a modification in the PP response for a FRA.	Comment noted. Representation regarding detailed wording of Policy F3 dealt with through Schedule 4 for submission to the Scottish Ministers/DPEA for consideration through the LDP Hearing process. Angus Council has suggested amendment to Policy wording through Non-Notifiable Modifications (NNM’s) which will be submitted to the LDP Hearing for	No action required.

		consideration by the Reporter(s).	
SEPA	F4 – The site assessment provided the same results as for F3. This site is, however, located in, or adjacent to the functional flood plain or an area potentially at flood risk. We therefore consider that the assessment results should be negative or uncertain and a FRA is required as a mitigation measure. Please see our PP response for details. We would also highlight the possible co-location issues due to existing uses at Orchardbank Industrial Estate to the northwest of the site which include a scrap yard, wood processing facility and sewage works. This could have an effect on Air and/or Human Health. We also note the unknown and neutral effects for Water in the site assessment, stating that ‘although surface water drainage from the site gravitates towards small watercourses which lead to Forfar Loch any potential effects are likely to be minimal due to distance from the SAC and the dilution effects of Forfar Loch’. This, however, became a positive effect in the F4 SEA Implications section and we are not clear how this has been determined. In addition we would like to highlight the opportunity for enhancement for the several watercourses present within the site.	Comment noted. Representation regarding detailed wording of Policy F4 dealt with through Schedule 4 for submission to the Scottish Ministers/DPEA for consideration through the LDP Hearing process. Angus Council has suggested amendment to Policy wording through Non-Notifiable Modifications (NNM’s) which will be submitted to the LDP Hearing for consideration by the Reporter(s).	No action required.
SNH	F4 – Housing – Westfield. The mitigation proposed (page 120) to retain existing woodland and hedges and landscape framework is welcomed.	Support welcomed.	No action required.
SEPA	K1- We note that Appendix 5, page 125, states: ‘Unknown impact of flooding, although a flood risk assessment is required as part of any future development proposals.’ We cannot find reference to a FRA in the development requirements. We have asked for a FRA in the PP response.	Comment noted. Representation regarding detailed wording of Policy K1 dealt with through Schedule 4 for submission to the Scottish Ministers/DPEA for consideration through the LDP Hearing process. Angus Council has suggested amendment to Policy wording through Non-Notifiable Modifications (NNM’s) which will be submitted to the LDP Hearing for consideration by the Reporter(s).	No action required.
SEPA	MF2 - The site assessment states that ‘the development site is not thought to be at risk from flooding and there is no known	Review detailed site assessment to ensure that proper regard is taken of	Assessment for site Mf2 and scoring reviewed. No change.

	<p>requirement to alleviate existing flooding problems’. We note, however, that the development requirements have requested a FRA, which we have supported in our PP response. While we welcome the development requirements, we note that there is a discrepancy with the assessment.</p>	<p>SEPA comments in relation to the RBMP for the River South Esk.</p>	
SNH	<p>M3 Mixed Use – Sunnyside Hospital; we support the environmental impact commentary (page 129) which refers to the existing landscape framework on the site and opportunities for creation and enhancement of green networks. However, we recommend reference to retention and management of the extensive woodland framework on this site, and its identification in mitigation.</p>	<p>Comment noted. Representation regarding detailed wording of Policy M3 dealt with through the Schedule 4 for Issue 20 – Montrose for submission to the Scottish Ministers/DPEA for consideration through the LDP Hearing process. Following consideration of the representation no change is proposed to Policy M3.</p>	<p>No action required.</p>
SNH	<p>M7 Working – Montrose Airfield. We feel the negative environmental impacts of development of this site are not reflected in the SEA. For example, landscape and visual, biodiversity and recreation and access impacts of this site are scored as minor positive or neutral but we recommend these are likely to be ‘negative’ impacts. We refer to the mitigation proposed for this site (page 131) and suggest this could have recommended a reduction in the extent of the site’s eastern boundary to help alleviate these impacts.</p>	<p>Review detailed site assessment to ensure that proper regard is taken of SEPA comments in relation to potential negative environmental effects. Potential landscape and visual impacts of development sites was considered in establishing the Options consulted on at the MIR stage. In preparing the proposed plan potential impacts were considered in more detail taking into account the Angus Settlements Landscape Capacity Study. Where appropriate site allocations include necessary mitigation and landscaping required to address potential impacts. This will require to be addressed through the planning application process. It is not considered appropriate to simply exclude some areas from site</p>	<p>Assessment for site M7 and scoring reviewed. No change</p>

		boundaries but to address potential landscape and visual impacts through the design of the development and any necessary landscaping.	
SEPA	M8 – The site assessment states that there is no apparent flood risk at this site and gives neutral score under Climatic Factors. This site is, however, located in or adjacent to the functional flood plain or an area potentially at flood risk. The effects, rather than neutral, should therefore be negative or unknown. We have therefore requested, as a mitigation measure, for a modification to the developer requirements to include a FRA which assesses the risk from the small watercourse which is shown on the boundary of the site.	Comment noted. Representation regarding detailed wording of Policy M8 dealt with through Schedule 4 for submission to the Scottish Ministers/DPEA for consideration through the LDP Hearing process. Angus Council has suggested amendment to Policy wording through Non-Notifiable Modifications (NNM's) which will be submitted to the LDP Hearing for consideration by the Reporter(s).	No action required.
SEPA	E1 - The site assessment states that 'whilst adjacent to the River North Esk, risk of flooding unlikely given height of site above river' (Climatic Factors). We note the neutral effects related to this comment. Although we have requested a FRA in the PP response, we would be open to discuss the situation in more detail. We also note the Air assessment in relation to odour issues, stating that the 'Policy requires submission of an Odour impact assessment to establish appropriate mitigation associated with the waste water treatment facility'. We are however unclear how the E1 SEA Implications give a positive score to Air while in the site assessment the effects were considered neutral.	Comments noted. Representation regarding detailed wording of Policy E1 dealt with through the Schedule 4 for Issue 21 – North Angus for submission to the Scottish Ministers/DPEA for consideration through the LDP Hearing process. Following consideration of the representation no change is proposed to Policy M3.	No action required.
SEPA	E2 – We consider that the site assessment could include an opportunity for enhancement in relation to de-culverting of the Wishop Burn which appears to be culverted through the site. This would help meeting the objectives of the Water Framework Directive. Please see our PP response for details.	Review detailed site assessment to ensure that proper regard is taken of SEPA comments in relation to potential negative environmental effects.	Site assessment in relation to the Wishop Burn and scoring reviewed. No change.
SEPA	G1 – The site assessment states that 'the site is not thought to be at risk from flooding or surface water issues'. Although the mitigation and the developer requirements mention a DIA, we have requested a	Comment noted. Representation regarding detailed wording of Policy G1 dealt with	No action required.

	FRA as well in the PP response.	through Schedule 4 for submission to the Scottish Ministers/DPEA for consideration through the LDP Hearing process. Angus Council has suggested amendment to Policy wording through Non-Notifiable Modifications (NNM's) which will be submitted to the LDP Hearing for consideration by the Reporter(s).	
SEPA	ST1 - Please note that in the PP response we requested a modification to the development requirements to include an FRA which assesses the risk from the Dighty Water and the small watercourse which may be culverted under the site.	Comment noted. Representation regarding detailed wording of Policy St1 dealt with through Schedule 4 for submission to the Scottish Ministers/DPEA for consideration through the LDP Hearing process. Angus Council has suggested amendment to Policy wording through Non-Notifiable Modifications (NNM's) which will be submitted to the LDP Hearing for consideration by the Reporter(s).	No action required.
Heathfield Ltd	The St1 SEA implications and the SEA report should recognise that there is a more positive benefit to redevelopment of the site. The grading/scoring of "0/+ Cultural Heritage"; "0/+ Population"; and "+ Landscape" does not recognise the sensitivity of the Listed Buildings, the scale of the site, or the poor state of repair and condition of the buildings. Support for the comprehensive redevelopment of the site as an identified development opportunity is supported. However, the comprehensive redevelopment of the site would have more significant positive benefits than those noted (and should therefore be scored higher on this basis as + or ++). Redevelopment would lead to significant physical, social and environmental improvements. The landscape would be transformed; a heritage asset that has been derelict for over a decade would be saved. The site is recognised as being a sustainable location accessible by public transport.	Review detailed assessment for site St1 to ensure that proper regard is taken of SEPA comments in relation to potential positive environmental effects from regeneration of the former Strathmartine Hospital Estate	Assessment for site St1 and scoring reviewed. No change.
SNH	Summary of Environmental Implications of the Proposed Angus LDP -	Support welcomed.	No action required.

	We consider this summary overall provides a good overall record of environmental implications of the LDP.		
SNH	Cumulative impacts (page 48) - We agree with cumulative negative impacts for loss of prime agricultural land (in fact soil sealing in general) and landscape impacts. We have commented on the use of mitigation to reduce landscape impacts above, and while we understand the difficulties of mitigating loss of prime agricultural land given that brownfield land alone cannot meet development land requirements in Angus, we suggest this could be strategic matter for TAYplan Strategic Development Plan to consider.	Comment noted. Agree that this should be directed in the first instance to the TAYplan SDPA to consider as part of the TAYplan Review.	No action required.
Scottish Water (SW)	<p>Environmental Report Appendix 1: Supporting Plans, Programmes and Strategies Scottish Water would welcome the inclusion of our 2015 Water Resource Plan within the appendix. This plan aims to demonstrate our commitment and strategy of securing a reliable supply of drinking water to protect public health, facilitate growth and support the Hydro Nation.</p> <p>Our Strategic Asset Capacity & Development Plan is updated annually and is a snapshot of our available capacity at our water and wastewater treatment works.</p>	<p>Comment noted.</p> <p>The 2015 Scottish Water Resource Plan was not available to inform the SEA process undertaken on the Proposed Plan during 2014. While it is not appropriate to include the document in Appendix 1: Supporting Plans, Programmes and Strategies at this stage, it will be appropriate to include it in finalising the Environmental Report following completion of the Hearing process. The document will be available for screening any modifications proposed by the Reporter(s).</p>	Appendix 1: Supporting Plans, Programmes and Strategies updated.
SEPA	Appendix 5 - We understand that Appendix 5 takes, in most cases, the summary of the positive and negative effects from the Site Assessment Including SEA Assessment (called from now on 'the sites assessment' in this response) and clarifies how the mitigation proposed has been taken into account. This is very useful in terms of audit trail and transparency of the process, however in some cases we found that Appendix 5 has a different text than the site assessment and it is not clear how this was decided.	Comment noted.	Appendix 5 and Site Assessment text reviewed to ensure consistency.

Reasons for Adopting the Angus Local Development Plan

The Planning etc. (Scotland) Act 2006 introduced a system of development planning for Scotland based on Strategic Development Plans (SDP's) and Local Development Plans (LDP's). The TAYplan SDP covering Angus, Dundee, Perth & Kinross and North Fife approved in June 2012 set the spatial strategy, policies and land requirements for the area. In line with legislative requirements Angus Council has prepared the Angus LDP consistent with the strategy and policies of the TAYplan SDP.

The Angus LDP sets out a presumption in favour of sustainable development as well as a development strategy, policies and land allocations to guide development to appropriate sustainable and accessible locations which will provide quality development which minimises impact on the areas high quality environment.

Throughout its preparation the policies, proposals and land allocations contained in the Angus LDP have been subject to Strategic Environmental Assessment and Habitats Regulations Appraisal and extensive consultation with stakeholders, key agencies and the general public at key stages in its development. The SEA and HRA process has not resulted in significant amendment to the Angus LDP. In a number of instances the policies have been refined and amended as a result of this process. These amendments are largely matters of clarification or detailed mitigation to ensure that the predicted impact of a policy or site allocation is either more certain, is positive, or its predicted positive impact is enhanced.

The Angus LDP will have an overall positive impact on the environment as it contains policies, proposals and land allocations which require environmental considerations to be taken into account in the preparation of development proposals and the determination of planning applications. In addition the LDP and associated Action Programme identify where Angus Council will prepare Supplementary Guidance, Development Briefs and Masterplans to provide more detail on particular environmental matters for consideration at a site specific scale.

Having met the legislative requirements of the Planning etc. (Scotland) Act 2006 and been subject to robust SEA and HRA process throughout its development the Angus LDP was adopted by Angus Council on 23 September 2016.

Measures that are to be taken to monitor significant environmental effects of the implementation of the Angus Local Development Plan:

Monitoring of the Angus Local Development Plan will be undertaken by Angus Council. The LDP Action Programme sets out actions to deliver and implement specific policies and proposals, and indicates the range of partner agencies and timescale for each action. Implementation of the actions will be monitored through regular updates of the Action Programme.

Section 6 of the Environmental Report sets out the approach to monitoring the environmental effects of the adopted Angus Local Development Plan. The effects of the ALDP on the Key Baseline information set out in Table 2 of the Environmental Report will be monitored and incorporated into the monitoring arrangements for the ALDP. The environmental effects of the LDP will also be

monitored through planning application decisions and any technical assessments and consultee comments or responses used to inform these decisions.

The Council will prepare and publish a Monitoring Report which will examine any significant changes to the principal environmental characteristics and assets of the area and the impact of the LDP policies, proposals and land allocations. This will be consistent with the requirements of the Planning etc. (Scotland) Act 2006.