

### Schedule of Representations to the Proposed Angus Local Plan Environmental Report and Angus Council Responses

Organisation & Representation Number	Comment	Angus Council Response	Action
<b>Scottish Environment Protection Agency (PP/00120/2/001)</b>	<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</p>	<p>General support welcomed. Note comment regarding availability of detailed site assessments.</p>	<p>No action required.</p>

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	<p>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><b>Historic Scotland (PP/00149/1/001)</b></p>	<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</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>Review detailed site assessments regarding scoring for impact on the Historic Environment.</p>

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	am content to agree that there is unlikely to be negative residual effects on historic environment assets upon delivery of appropriate mitigation.		
<b>Scottish Environment Protection Agency (PP/00120/2/002)</b>	Introduction and Non-Technical Summary We are satisfied with the content of the NTS and have no comments to add on the introduction.	Support welcomed.	No action required.
<b>Scottish Environment Protection Agency (PP/00120/2/003)</b>	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.	Agree it would be useful to provide information based on the most up to date available assessment of Air Quality in Angus.	Update Table 2 in Air Quality Section to reflect most up to date available Angus Council Report on Air Quality.
<b>Scottish Environment Protection Agency (PP/00120/2/004)</b>	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.'	Support welcomed.  Support welcomed.	No action required.  No action required.

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	<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>
<p><b>Scottish Natural Heritage (PP/00064/4/001)</b></p>	<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: <a href="http://www.Snh.Gov.Uk/docs/A1495150.Pdf">http://www.Snh.Gov.Uk/docs/A1495150.Pdf</a></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</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>Review Soils section of Current State of the Angus Environment (page 14) to reflect the SNH Carbon and Peat Map when .</p>

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	the baseline for Angus.		
<b>Scottish Natural Heritage (PP/00064/4/002)</b>	Environmental problems - We appreciate the incorporation of recommendations we made in our scoping response and have no further comments.	Comment noted.	No action required.
<b>Scottish Natural Heritage (PP/00064/4/003)</b>	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.	Comment noted.  Agree that the outcome of the HRA process and resultant amendment to Policies in the Proposed Plan should be reflected in the Environmental Report.	Amend the Summary of Environmental Implications of the Proposed ALDP Section, Appendix 4: Policy Framework Impacts and Mitigation, and Appendix 5: Settlement Strategy Impacts and Mitigation to reflect the outcome of the HRA process regarding impacts on European designated sites.
<b>Scottish Environment Protection Agency (PP/00120/2/005)</b>	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).	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	No action required for the SEA.

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	<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 available to SEPA and it is related to the sites for which AC has requested SEPA's comments.</p> <p>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.</p> <p>We cannot find reference to cumulative, secondary or synergistic effects in relation to the sites. Often these</p>	<p>Reporter(s). Comment noted.</p> <p>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.</p> <p>As set out in the response to representation PP/00120/2/004</p>	<p>No action required.</p> <p>Review SEA Assessments for Policies and Sites and amend</p>

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	<p>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</p>	<p>(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.</p>	<p>the Summary of Environmental Implications of the Proposed ALDP section. Incorporate additional text to address potential cumulative, secondary or synergistic effects.</p>
<p><b>Scottish Natural Heritage</b> <b>(PP/00064/4/004)</b></p>	<p>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.</p> <p>We note that a neutral or positive impact was predicted for the 45 policies assessed, with no</p>	<p>Comment noted.</p> <p>Agree to indicate that the scoring relates to pre or post-mitigation stage and where appropriate any residual effects following mitigation.</p> <p>Review scoring for biodiversity, soils and landscape in detailed</p>	<p>Amend paragraph 5.7, page 35 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> <p>Review individual site assessments and amend scoring</p>

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	<p>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>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>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>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</p>	<p>as appropriate.</p> <p>Review assessment for Policy PV9 and amend scoring as appropriate.</p>

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		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.	
<b>Scottish Environment Protection Agency (PP/00120/2/007)</b>	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 our comments on the PP.	Support noted	No action required.
<b>Scottish Environment Protection Agency (PP/00120/2/012)</b>	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>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</p>	Review Policy and site assessments and amend scoring as necessary from Neutral to Unknown.

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		<p>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><b>Scottish Environment Protection Agency (PP/00120/2/013)</b></p>	<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>Review site assessment and amend scoring as appropriate.</p>
<p><b>Scottish Environment Protection Agency</b></p>	<p>PV 12 – Managing Flood Risk - We agree with the detailed assessment (Climatic Factors significant positive effects ++) and understand from Appendix 4</p>	<p>Comment noted.</p> <p>The scoring system does not</p>	<p>No change required to the SEA.</p>

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<b>(PP/00120/2/008)</b>	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.	allow the score to be increased beyond ++ - significant positive effect.	
<b>Scottish Environment Protection Agency (PP/00120/2/009)</b>	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 to the SEA.
<b>Scottish Environment Protection Agency (PP/00120/2/010)</b>	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	Comment noted.  The scoring system does not allow the score to be increased beyond ++ - significant positive effect.	No action required.

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	capacity in the existing sewer system.		
<b>Scottish Environment Protection Agency (PP/00120/2/011)</b>	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 Modifications (NNM's) which will be submitted to the LDP Hearing for consideration by the Reporter(s).	No action required.
<b>Scottish Natural Heritage (PP/00064/4/005)</b>	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. We feel that on a few occasions that negative effects	Support welcomed.  Comments noted.	No action required.  No action required.

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	<p>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>Allocations C1 and C7 - as these sites have the potential to generate landscape and visual impacts, we recommend the scoring is revised from</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>Agree to review site assessments for Sites C1 and C7 regarding potential landscape and visual</p>	<p>Review individual site assessments and amend scoring as appropriate.</p>

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	<p>'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>impacts.</p>	
<p><b>Scottish Environment Protection Agency (PP/00120/2/015)</b></p>	<p>Site Assessment including SEA Assessment - In our response to the ALDP PP we have requested the removal of site A6 Former Bleachworks, Elliot.</p> <p>We also made representations to modify a number of allocations mainly on the basis of flood risk and on the effects on the water environment. We consider that these significant environmental effects were not identified in the site assessment.</p> <p>In addition we made a number of comments for other sites in the PP response ('comment only' sites) which we would recommend AC takes into account. These may not change the significance of the effects and we therefore we have not referenced them in this SEA response, however we would however be available for further discussion with the AC, if necessary, on the relations with SEA.</p> <p>Please note that for some sites which have not been assessed as part of the SEA we have requested modifications in our PP response. These are A10, B1, M1.</p>	<p>Comments noted.</p> <p>Representations regarding detailed wording of individual Policies for sites dealt with through appropriate 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>No action required.</p>
<p><b>Scottish Environment</b></p>	<p>A1 - We welcome the flood risk assessment. We note that Water has a neutral and positive score, but the</p>	<p>Review detailed site assessment to ensure that proper regard is</p>	<p>Review detailed site assessment, amend scoring and consider</p>

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<b>Protection Agency (PP/00120/2/031)</b>	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.	taken of SEPA comments in relation to the RBMP pressures on the adjacent watercourse.  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.	requirement for additional mitigation as appropriate.
<b>Scottish Environment Protection Agency (PP/00120/2/032)</b>	A3 - We welcome the assessment and note that the mitigation has been incorporated in the developer requirements.	Support welcomed.	No action required for the SEA.
<b>Scottish Environment Protection Agency (PP/00120/2/016)</b>	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	Review detailed site assessment to ensure that proper regard is taken of SEPA comments in relation to the RBMP for the River South Esk.  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	Review individual site assessments and amend scoring as appropriate.

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	<p>River Basin Management Planning (RBMP) - these are: buffer strips, SUDS, foul drainage, ecological pressures. We would therefore welcome if the AC identifies opportunities for improvement of the water environment as part of the mitigation/enhancement measures.</p>	<p>Hearing. Angus Council has suggested 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).</p>	
<p><b>Scottish Environment Protection Agency (PP/00120/2/017)</b></p>	<p>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</p>	<p>Review detailed site assessment to ensure that proper regard is taken of SEPA comments in relation to potential adverse effects on groundwater.</p> <p>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</p>	<p>Review individual site assessments and amend scoring as appropriate.</p>

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	site.	by the Reporter(s).	
<b>Scottish Environment Protection Agency (PP/00120/2/018)</b>	<p>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.</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 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>	<p>Review individual site assessments and amend scoring as appropriate.</p>
<b>Scottish Environment</b>	<p>B5 - The site assessment states for Water (neutral score) that 'there is no direct link to a designated water body</p>	<p>Review detailed site assessment to ensure that proper regard is</p>	<p>Review assessment for site B5 and amend scoring as</p>

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<b>Protection Agency (PP/00120/2/019)</b>	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.	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 consideration of the representation no change is proposed to Policy B5.	appropriate.
<b>Scottish Environment Protection Agency (PP/00120/2/020)</b>	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.	Comment noted.  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	No action required.

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<b>Scottish Environment Protection Agency (PP/00120/2/021)</b>	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).	by the Reporter(s).  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.
<b>Scottish Environment Protection Agency (PP/00120/2/022)</b>	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)	No action required.

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		which will be submitted to the LDP Hearing for consideration by the Reporter(s).	
<b>Scottish Environment Protection Agency (PP/00120/2/025)</b>	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 consideration by the Reporter(s).	No action required.
<b>Scottish Environment Protection Agency (PP/00120/2/026)</b>	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	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	No action required.

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	<p>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.</p>	<p>Policy wording through Non-Notifiable Modifications (NNM's) which will be submitted to the LDP Hearing for consideration by the Reporter(s).</p>	
<p><b>Scottish Natural Heritage</b> (PP/00064/4/006)</p>	<p>F4 – Housing – Westfield. The mitigation proposed (page 120) to retain existing woodland and hedges and landscape framework is welcomed.</p>	<p>Support welcomed.</p>	<p>No action required.</p>
<p><b>Scottish Environment Protection Agency</b> (PP/00120/2/033)</p>	<p>MF2 - 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'. 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>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>Review assessment for site Mf2 and amend scoring as appropriate.</p>
<p><b>Scottish Natural Heritage</b> (PP/00064/4/007)</p>	<p>M3 Mixed Use – Sunnyside Hospital; we support the environmental impact commentary (page 129) which refers to the existing landscape framework on the site</p>	<p>Comment noted. Representation regarding</p>	<p>No action required.</p>

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	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.	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.	
<b>Scottish Natural Heritage (PP/00064/4/008)</b>	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>Review detailed site assessment to ensure that proper regard is taken of SEPA comments in relation to potential negative environmental effects.</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. Where appropriate site allocations include necessary mitigation and landscaping required to address potential</p>	Review assessment for site M7 and amend scoring as appropriate.

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		<p>impacts. This will require to be addressed through the planning application 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><b>Scottish Environment Protection Agency (PP/00120/2/029)</b></p>	<p>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.</p>	<p>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).</p>	<p>No action required.</p>
<p><b>Scottish Environment Protection Agency</b></p>	<p>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</p>	<p>Comments noted. Representation regarding</p>	<p>No action required.</p>

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<b>(PP/00120/2/023)</b>	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.	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.	
<b>Scottish Environment Protection Agency (PP/00120/2/024)</b>	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.	Review individual site assessment in relation to the Wishop Burn and amend scoring as appropriate.
<b>Scottish Environment Protection Agency (PP/00120/2/028)</b>	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)	No action required for the SEA.

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		which will be submitted to the LDP Hearing for consideration by the Reporter(s).	
<b>Scottish Environment Protection Agency (PP/00120/2/027)</b>	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 FRA as well in the PP response.	Comment noted.  Representation regarding detailed wording of Policy G1 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 for the SEA.
<b>Scottish Environment Protection Agency (PP/00120/2/030)</b>	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	No action required for the SEA.

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		<p>Policy wording through Non-Notifiable Modifications (NNM's) which will be submitted to the LDP Hearing for consideration by the Reporter(s).</p>	
<p><b>Heathfield Ltd (PP/00050/2/001)</b></p>	<p>The St1 SEA implications and the SEA report should recognise that there is a more positive benefits 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.</p>	<p>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</p>	<p>Review assessment for site St1 and amend scoring as appropriate.</p>
<p><b>Scottish Natural Heritage (PP/00064/4/009)</b></p>	<p>Summary of Environmental Implications of the Proposed Angus LDP - We consider this summary overall provides a good overall record of environmental implications of the LDP.</p>	<p>Support welcomed.</p>	<p>No action required.</p>

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<b>Scottish Natural Heritage (PP/00064/4/010)</b>	<p>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.</p>	<p>Comment noted. Agree that this should be directed in the first instance to the TAYplan SDPA to consider as part of the TAYplan Review.</p>	<p>No action required.</p>
<b>Scottish Water (PP/00127/2/001)</b>	<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 &amp; Development Plan is updated annually and is a snapshot of our available capacity at our water and wastewater treatment works.</p>	<p>Comment noted. 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>	<p>No action at this stage. Update Appendix 1: Supporting Plans, Programmes and Strategies in finalising the Environmental Report following the Hearing process.</p>

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<b>Scottish Environment Protection Agency (PP/00120/2/014)</b>	<p>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.</p>	<p>Comment noted.</p>	<p>Review Appendix 5 and Site Assessment text to ensure consistency.</p>

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