

Appendix 2:

Angus Forestry & Woodland Strategy

Strategic Environmental Assessment (Environmental Report) – Summary of Consultation

Consultee	Consultee Response	Council Response
Scottish Environmental Protection Agency	<p>Thank you for your Environmental Report (ER) consultation submitted under the above Act. This was received by SEPA via the Scottish Government SEA Gateway on 19 January 2024 in relation to the above application.</p> <p>Overall, we agree with the findings that any significant environmental effects are likely to be positive and any potential adverse effects can be mitigated through policies.</p> <p>Alternatives</p> <p>It is noted that the steering group discussed different approaches to addressing issues and therefore an assessment of alternatives isn't included. The assessment could have considered the options discussed by the steering group in more detail.</p> <p>The Forestry and Woodland Strategy looks at the suitability of areas for woodland and forestry expansion and categorises sites into preferred, potential, or sensitive. The alternatives assessment could have considered the environmental effects of planting in the different categorised areas.</p> <p>Natural flood risk management and riparian woodland</p> <p>We welcome the recognition of the important role that woodlands can play in natural flood management and the multiple benefits that riparian woodland can provide. It is however important to ensure appropriate siting of any new planting and management of commercial forestry to minimise any negative effects on flood risk.</p>	<p>The comments of SEPA overall are welcomed.</p> <p>The comments of SEPA are noted, however, only reasonable alternatives should be provided and then assessed. However, the alternatives discussed were considered not to be reasonable and therefore were not assessed – this will be addressed further in the post adoption stage. Given that significant environmental effects are likely to be positive and any potential adverse effects can be mitigated through policies, the ER is considered sufficient.</p> <p>The support from SEPA is welcomed and the published guidance to which you refer will be helpful in avoiding negative impacts.</p>

	<p>Section 2.2 of SEPA's Natural Flood Management Handbook provides advice in relation to woodland creation and flood management.</p> <p>Appendix B Main Plans, Programmes, and Strategies (PPS)</p> <p>We consider the table in appendix B to include the main relevant PPS however you might want to include the following PPS: SEPA's Natural Flood Management Handbook, 2015, Riverwoods for Scotland Report on Scientific Evidence, The Riverwoods Science Group, 2022, the River Basin Management Plan for Scotland 2021-2027, the Local Flood Risk Management Plan.</p> <p>As the proposal is finalised the Responsible Authority, will be required to take account of the findings of the Environmental Report and of views expressed upon it during this consultation period. As soon as reasonably practical after the adoption of the plan, the Responsible Authority should publish a statement setting out how this has occurred. We normally expect this to be in the form of an "SEA Statement" similar to that advocated in the Scottish Government SEA Guidance. On publication a copy of the SEA statement should be sent to the Scottish Government SEA Gateway who will forward it to the Consultation Authorities.</p> <p>If you have queries relating to this letter, please contact us via our SEA Gateway at sea.gateway@sepa.org.uk including our reference number in the email subject.</p>	<p>The suggested additional references is welcomed and we will consider them in implementing the Strategy.</p> <p>As per legislative requirements, the Council will produce a post-adoption statement as soon as practically possible after adoption of the Strategy.</p>
NatureScot	<p>Environmental Report</p> <p>We provided detailed comments at the scoping stage and some of our recommendations have been incorporated into the Environmental Report. We have some concerns in relation to the Environmental Report and feel the assessment could be more comprehensive to ensure that this is satisfactory.</p> <p>Enhancement and mitigation measures that could prevent, reduce, or offset any significant adverse effects on the</p>	<p>The comments of NatureScot are duly noted.</p> <p>Discussed below adjacent to detailed comments in Annex 2.</p>

	<p>environment when implementing the Strategy have not been clearly identified and should be given further consideration. The monitoring measures proposed should also be robust and linked to the SEA Objectives used in the assessment. It would be useful to consider what relevant indicators/datasets could be used to assess if the target will be met.</p> <p>There are several references to 'Natura 2000 sites' in Appendix E. We recommend that all references to 'Natura 2000 sites' are updated to refer to 'European sites'. Following Brexit, SACs and SPAs no longer form part of the official 'Natura 2000' network but continue to contribute to the Europe- and UK-wide network of designated sites and will continue to fulfil the objectives of the EU Habitats and Birds Directives through the Habitat Regulations.</p> <p>We have included further comments on the Environmental Report in Annex 2.</p> <p>Annex 2</p> <p>Section 5 – Baseline Environmental Data</p> <p>It would be useful to understand what specific baseline data sources have been used. A table that outlines the baseline data source used for each topic should be included. We raised this in our scoping response.</p> <p>Section 8 – Assessment Methodology</p> <p>Section 8.3 – remove wording '... and where appropriate'</p>	<p>The comments of NatureScot are duly noted.</p> <p>Noted.</p> <p>The baseline data was reviewed taking into account NatureScots comments at the scoping stage and are clearly detailed in the Environmental Report. Baseline data to inform policy formulation and in particular provide spatial analysis is variable and not always available, therefore we are disappointed that NatureScot have not recognised this in their comments. For example, whilst there are good reliable spatial data available for woodlands, forestry, water quality, flooding, and upland deer populations, there is a lack of comprehensive spatial data in relation to habitats and lowland deer populations which are within the statutory remit of NatureScot. We are however under a separate project seeking to carry out habitat mapping for Angus which will assist in future.</p> <p>The Council will make this change to the Environmental Report.</p>
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	<p>Section 9 – Assessment Results</p> <p>It is not clear the reasoning behind why only Policy 1 and Policy 2 have been taken forward to the stage 2 assessment.</p> <p>Table 4 – Summary of Stage 1 Results – we do not necessarily agree that only Policy 1 and Policy 2 are scoped into the stage 2 assessment. There is not enough information in the Environmental Report or consideration given to the other policies to make a judgment on whether they will result in any negative effects.</p> <p>Appendix D – Full Stage 1 Policy and Proposal Assessment Results – the assessment on each of the components is very generic. It would be useful if this was more detailed and specific.</p> <p>Section 10 – Enhancement and Mitigation</p> <p>It is unclear what enhancement and mitigation measures have been proposed. Appendix E sets out the full stage 2 policy and proposals assessment results for Policy 1 and Policy 2. There does not appear to be any reference to enhancement in this section and the mitigation measures also lack clarity. This is important to consider and should be integrated in the Strategy too.</p> <p>Section 11 – Monitoring</p> <p>Section 11 – Table 1 – monitoring measures are proposed through ‘anecdotal observation’ for landscape, biodiversity, soil and air. It is unclear what this means and we would suggest this is not a robust or acceptable monitoring measure. It would be useful to consider what relevant indicators/datasets could be used to assess if the target will be met and include reference to the data set that will be used to measure this.</p>	<p>The comments of NatureScot are duly noted. It can be challenging to anticipate specific proposals which may come forward and word policies to take account of theoretical scenarios. Application of policies in part is dependent upon operational decisions by Scottish Forestry and the input of consultees.</p> <p>Generally agreed for the same reasons discussed under section 9.</p> <p>The comments of NatureScot are duly noted. The ER concludes that the application of the other policies will mitigate significant adverse impacts. It can be challenging to anticipate specific proposals which may come forward and word policies to take account of theoretical scenarios. Application of policies in part is dependent upon operational decisions by Scottish Forestry and the input of consultees.</p> <p>The comments of NatureScot are duly noted. The paucity of spatial data referred to in relation to section 5 creates challenges for monitoring beyond the spatial data sets which are regularly updated such as woodland and forest areas, water quality etc. Angus Council has no statutory responsibilities in relation to most of data that would be helpful in carry out a more systematic monitoring process. We will be relying upon data from Scottish Forestry and SEPA, and would also welcome information on how NatureScot data can contribute towards monitoring.</p>
<p>Historic Environment Scotland</p>	<p>We welcome the response to our comments at the scoping stage and that our recommendations have been acted upon.</p> <p>Assessment Results</p>	<p>The comments of HES are duly noted and appreciated.</p>

	<p>We note that the historic environment has been taken forward for the detailed assessment (Stage 2) in relation to Policy 1 (Woodland of High Nature Conservation Value) and Policy 2 (Productive Forestry). We agree with this as these two policies are most likely to involve woodland expansion which has the potential to interact with historic environment resources.</p> <p>The Stage 2 assessment recognises that woodland expansion has the potential for significant effects on the site and setting of scheduled monuments, historic gardens and designed landscapes and Archaeological Sites and Areas. However, the assessment concludes that such impacts will be mitigated by the appropriate application of Policy 8 (Historic Environment). While we are content to agree with this finding we would note that there will be times where policy objectives compete and balanced decisions will need to be made (as is reflected in the wording of Policy 8 which refers to proposals that adversely affect historic environment assets not generally being supported). In light of this we welcome the commitment to monitor the effects of the plan on the historic environment.</p> <p>None of the comments contained in this letter constitute a legal interpretation of the requirements of the Environmental Assessment (Scotland) Act 2005. They are intended rather as helpful advice, as part of our commitment to capacity building in SEA.</p> <p>We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Andrew Stevenson who can be contacted by phone on 0131 668 8960 or by email on andrew.stevenson2@hes.scot.</p>	<p>The comments of HES are duly noted and appreciated.</p> <p>The comments of HES are duly noted. It can be challenging to anticipate specific proposals which may come forward and word policies to take account of theoretical scenarios. Application of policies in part is dependent upon operational decisions by Scottish Forestry and the input of consultees.</p>

Public Consultation Responses on Environmental Report

Table 2: Themed Grouping of Responses to Question 36 – Environmental Report Stage 1

Theme	Summary of Response	Council Response	Proposed Changes to the LLAs	Respondent ID(s)
Uncertainty	Respondents believe there is uncertainty in predicting outcomes.	Partially accepted. It is accepted that there can be tension between policies and that there is a necessity for operational judgement.	No proposed changes	FWS011
Link to Environmental Report	Respondent did not find link to Environmental Report,	It is unfortunate that you did not find either link in the consultation page text or in the document links on the page. However, we are confident the link to the Environmental Report was visible as no other respondent commented that they could not find the link.	No proposed changes	FWS031
No response required	Various comments which do not require a response including support for strategy	The support of the respondents is noted and welcomed.	No change proposed.	FWS009, FWS010, FWS025, FWS037, FWS053, FWS054,

Respondent ID	Name	Organisation	Q36 (Do you have any comment on the Stage 1 assessment within the Environmental Report?)
FWS009	Angela Taylor		Please see comment (no35)
FWS010	John Wilson		There is always a detrimental impact to any interference.

FWS011	Andrew Hubberstey		Please be open to the fact that this is a living landscape, shaped by people over the centuries, changes must be taken in the round, rather than kneejerk changes that have major ramifications further down the line for residents.
FWS025	Julie Cave		Do not understand enough about it to comment.
FWS031	Robin Johnson		I cannot comment as you have not provided a link to read the full Stage 1 assessment and so consider its detailed findings.
FWS037	Judith Robertson		Its clear
FWS053	Anne Matthews		Acceptable as a fair analysis
FWS054	Anne Dunbar-Nobes		I found this section rather hard to follow and do not feel comfortable commenting on this.

Table 2: Themed Grouping of Responses to Question 37 – Environmental Report Stage 2

Theme	Summary of Response	Council Response	Proposed Changes to the LLAs	Respondent ID(s)
Uncertainty	Respondents believe there is uncertainty in predicting outcomes.	Partially accepted. It is accepted that there can be tension between policies	No proposed changes	FWS011, FWS053

		and that there is a necessity for operational judgement.		
Self-Interested Bodies	Respondent concerned by weight given to self-interested bodies.	We are required to consult with NatureScot, Historic Environment Scotland and Scottish Environmental Protection Agency.	No proposed changes	FWS010
Link to Environmental Report	Respondent did not find link to Environmental Report,	It is unfortunate that you did not find either link in the consultation page text or in the document links on the page. However, we are confident the link to the Environmental Report was visible as no other respondent commented that they could not find the link.	No proposed changes	FWS031
No response required	Various comments which do not require a response including support for strategy	The support of the respondents is noted and welcomed.	No change proposed.	FWS009, FWS025, FWS040, FWS054,

Respondent ID	Name	Organisation	Q37 (Do you have any comment on the Stage 2 assessment within the Environmental Report?)
FWS009	Angela Taylor		Please see comment (no35)
FWS010	John Wilson		I am concerned at the weight attached to involvement of some self-interested bodies.

FWS011	Andrew Hubberstey		Please be open to the fact that this is a living landscape, shaped by people over the centuries, changes must be taken in the round, rather than kneejerk changes that have major ramifications further down the line for residents.
FWS025	Julie Cave		As above
FWS031	Robin Johnson		I cannot comment as you have not provided a link to read the full Stage 2 assessment and so consider its detailed findings.
FWS037	Judith Robertson		Should be more robust statement on the adverse impact and the risk of commercial non native forestry
FWS040	Lesley Anderson	Lunan Bay Community Partnership	It includes a wider assessment of very important factors therefore is relevant.
FWS053	Anne Matthews		It is unclear to me how the process of the stage 2 assessment could be entirely definitive in its outcome so as to justify such a statement of certainty "that the other policies within the strategy mitigated ANY potential adverse impacts." I think there will inevitably be an uncertainty of tensions arising where policies will have unexpected conflicting impacts in some circumstances. I would prefer an openness to acknowledge there will be uncertainties which will need to be addressed and open to debate and, if necessary, public consultation to assist towards determining a weighted decision towards prioritising one or more policies over others.

FWS054	Anne Dunbar-Nobes		As above
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Table 2: Themed Grouping of Responses to Question 38 – Cumulative and Synergistic Impact with Environmental Report

Theme	Summary of Response	Council Response	Proposed Changes to the LLAs	Respondent ID(s)
Uncertainty	Respondent highlighted the uncertainty of predicting impacts.	Broadly accepted as a possibility, but it is considered more likely than not that impacts will be as described.	No change proposed	
The use specialist assessment terminology	Respondent unhappy with terminology used including “synergistic impacts”.	The assessment terms are required to be adhered to as they are legislative terms and therefore, whilst noting your unhappiness with these terms, the Council would be legally abiding with the Environmental Assessment (Scotland) Act 2005 if they didn’t replicate them.	No change proposed	FWS031
Deer Population Data & Target	Opinion that the data in relation to deer populations is incorrect (FWS052).	The data used is from NatureScot, mapped at one-kilometre squares and is considered correct. It is however acknowledged that there may be seasonal geographic movement of populations, but the data is considered suitable as a basis for identifying issues and the development of policy.	No change proposed	FWS052
Outdated landscape baseline	Respondent considered the possibility that the landscape baseline was already out of date due	It is accepted that changes are occurring in terms climate, landscape and how it is used. However, we need to plan for the future and we believe	No change proposed	FWS040

	to climate change and flooding.	that we have enough knowledge to plan for the future.		
No response required	Various comments which do not require a response including support for strategy	The support of the respondents is noted and welcomed.	No change proposed.	FWS009, FWS025, FWS037, FWS054,

Respondent ID	Name	Organisation	Q38 (Do you have any comment on the assessment of cumulative and synergistic impacts within the Environmental Report?)
FWS009	Angela Taylor		Please see comment (no35)
FWS025	Julie Cave		As above
FWS031	Robin Johnson		BS expressions like 'synergistic impacts' impress nobody. Please use clear, plain language.
FWS037	Judith Robertson		its clear
FWS040	Lesley Anderson	Lunan Bay Community Partnership	There should be more assessment of the changing landscape following the recent climate changes and flooding, I am concerned this information may already be outdated.

FWS052	Deirdre Stewart		I don't have confidence in your process when the data used on deer was factually and fundamentally incorrect.
FWS053	Anne Matthews		Cumulative impacts can be planned for - and expected to emerge and occur. An ambition of the strategy would be for cumulative impacts to "considered to be positive" . However, without 'a crystal ball' there can be no absolute certainty to justify the statement " a number of policies WILL TOGETHER result in cumulative impacts which are considered to be positive." Human approaches and needs change and what might seem ' a positive' right now could be considered differently in future.
FWS054	Anne Dunbar-Nobes		As above.