



Tree and Woodland Strategy for East Lothian
Strategic Environmental Assessment
Post Adoption Statement

Published: April 2025

Planning Service, John Muir House, Haddington EH41
3HA

Contents

Mapping Copyright Notice	3
Abbreviations	3
1. Introduction	4
2. How Environmental considerations have been integrated into the plan.....	7
3. How the Environmental Report has been taken into account	10
4. How the opinions expressed in response to invitation to the consultation authorities and the public to comment have been taken into account.....	13
Responses from the Consultation Authorities.....	14
Responses from the public.....	16
5. How the results of any transboundary consultation have been taken into account	21
6. The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives considered.....	21
7. The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.....	22
APPENDIX ONE: CONSULTATION ON DRAFT ENVIRONMENT REPORT.....	23

Mapping Copyright Notice

© Crown copyright and database rights 2022-4 OS licence number AC0000824676. You are granted a non-exclusive, royalty free, revocable licence solely to view the Licensed Data for non-commercial purposes for the period during which East Lothian Council makes it available. You are not permitted to copy, sub-license, distribute, sell or otherwise make available the Licensed Data to third parties in any form. Third party rights to enforce the terms of this licence shall be reserved to OS.

Abbreviations

AA	Appropriate Assessment – assessment under the Conservation (Natural Habitats, &c) Regulations 1994 (Habitat Regulations)
HES	Historic Environment Scotland
HRA	Habitat Regulation Appraisal as required by the Conservation (Natural Habitats, &c) Regulations 1994 (Habitat Regulations)
EA(S) Act	Environmental Assessment (Scotland) Act 2005
ELC	East Lothian Council
ELLDP	East Lothian Local Development Plan 2018
FWSEL	Forestry and Woodland Strategy for East Lothian
PPS	Plan, project or strategy
SEA	Strategic Environmental Assessment
SEPA	Scottish Environmental Protection Agency
SPA	Special Protection Agency
TWSEL	Tree and Woodland Strategy for East Lothian
UN	United Nations

1. Introduction

Purpose of this Statement

1.1. The Tree and Woodland Strategy for East Lothian (TWSEL) was adopted on 14 May 2024. Section 3.18 of the Environmental Assessment (Scotland) Act 2005 requires Strategic Environmental Assessment (SEA) to be carried out on certain strategies, of which the TWSEL was one. The Act requires a statement to be published post adoption. The statement must set out how the findings of the Environment Report have been integrated into the plan. It must also include how any consultation responses have been taken into account. This document is that statement.

The key facts relating to this PPS are set out below:

TABLE 1: Key Facts	
Name of Responsible Authority	East Lothian Council
Title of PPS	Tree and Woodland Strategy for East Lothian
What prompted the PPS	Legislative provision of the Planning (Scotland) Act 2019 amending Section A159 to the Town and Country Planning (Scotland) Act 1997, to require the planning authority to prepare a Forestry and Woodland Strategy. The TWSEL will replace the Lothian Forestry and Woodland Strategy 2013-2017 as regards East Lothian.
Area covered by PPS	East Lothian
Subject	Forestry and Woodland
Period covered by PPS	The PPS does not have an end date however it anticipated that it is unlikely to require to be reviewed for at least 10 years.
Frequency of updates	Tree and woodland planting have a long timeframe due to the rate of maturation of trees. It is thought the strategy is unlikely to require updating for around 10 years, but the Council will keep this under review.
Purpose of PPS	To set framework for the expansion and management of trees and woodland cover across East Lothian including, as laid down by legislation: (a) the identification of woodlands of high nature conservation value in the planning authority’s area, and (b) the planning authority’s policies and proposals in their area, as to— (i) the development of forestry and woodlands, (ii) the protection and enhancement of woodlands, in particular those mentioned in paragraph (a), (iii) the resilience to climate change of woodlands, in particular those mentioned in paragraph (a),

	(iv) the expansion of woodlands of a range of types to provide multiple benefits to the physical, cultural, economic, social and environmental characteristics of the area.
Contact	Policy & Strategy, East Lothian Council, John Muir House, Haddington EH41 3HA. Email: ldp@eastlothian.gov.uk


Map of the Area Covered by the Forestry and Woodland Strategy for East Lothian



Strategic Environmental Assessment Activities – brief summary of process

1.2 The purpose of SEA is to make better policy by taking account of environmental issues from the start. SEA must assess the **likely significant** environmental effects, both positive and negative, of the strategy. SEA gives both the public and decision takers a better understanding of the environmental impacts of a strategy.

1.3 The main stages of SEA are set out below:

TABLE 2: SEA Stages	
STAGE	PROGRESS
Screening – determining whether or not a plan needs SEA	n/a
Scoping – establishing what aspects of the environment are likely to experience significant effects, and how this should be examined	September – October 2021
Environmental Assessment – draw up a draft Environment Report assessing the impacts of the proposed strategy, including consulting and ‘Environment Report’.	January 2021- April 2023
Consultation – Consulting the public and the Consultation Agencies on the draft Environment Report	June – August 2023
Finalised Environment Report – amend the draft Environment Report taking into account the views of key statutory bodies and the public on an	April 2024
Decision – approval of the plan, taking into account the environmental information contained in the finalised Environment Report	14 May 2024
Post-Adoption Statement – setting out how the assessment and views of the public and key statutory bodies were integrated	
Monitoring – monitoring the significant effects of the plan and taking action if anything unexpected arises from the implementation of the plan	3 yearly following adoption

1.4 The Council considered the TWSEL is a plan that automatically requires SEA under Section 5 (3) of the EA(S) Act, so did not carry out Screening. At the Scoping stage, the consultation authorities (SEPA, NatureScot and HES) were consulted for their views. Having considered their views, the Council decided on the scope of the Environment Report and prepared a draft. The draft was sent to the consultation authorities, and Scottish Forestry, prior to formal consultation. Their comments at that stage were considered by the Council, and we thank them for their engagement.

1.5 This was followed by the formal consultation stage. The TWSEL and the draft Environment Report, including its Non-Technical Summary were made available on the Council’s Consultation Hub at <https://eastlothianconsultations.co.uk/housing-environment/tws> and a link was sent to the SEA Gateway. The documents were also available at John Muir House, the Council’s Headquarters. A Notice was placed in the East Lothian Courier on 8 June 2023 inviting comments on both the Strategy and the draft Environment Report. Details of the consultation arrangements are set out in Appendix 3.

1.6 Now it has been adopted, the TWSEL will operate within a framework of the existing national and local policy, including the Scottish Forestry Strategy, the Scottish Biodiversity Strategy, National Planning Framework 4, East Lothian Local Development Plan and the forthcoming East Lothian Local Biodiversity Action Plan and many others. These strategies have where relevant been subject to SEA¹. The relationship of the TWSEL with other plans is included in the Environment Report.

1.7 Arrangements for monitoring are set out in the Environment Report. The Planning Service intends to report on this after 3, 6 and 9 years by presenting a report to East Lothian Council’s Cabinet or placing information into the Members Library Service.

2. How Environmental considerations have been integrated into the plan

2.1. The Strategy has aimed from the start to achieve environmental aims. It is organised into seven themes: Climate Mitigation; Resilience (which incorporates climate adaptation); Biodiversity; Community; Economy; Cultural Heritage and Landscape. As can be seen, several of these themes overlap with SEA topics. The development of the TWSEL was done in close step with the completion of the SEA. This allowed a continual process of adjustment as the Strategy was developed.

2.2. The table below shows the SEA objectives and how they were addressed in the Strategy.

TABLE 3 Key environmental issues		
SEA Topic	SEA Sub-objective	TWSEL Response
<p>Biodiversity, Flora and Fauna</p> <p>Overall objective:</p> <p><i>Maintain and enhance Biodiversity</i></p>	<ul style="list-style-type: none"> • <i>Contribute to addressing national/international biodiversity issues</i> • <i>Conserve existing biodiversity</i> • <i>Support the Central Scotland Green Network</i> 	<p>The HRA and AA of the Strategy shows that the strategy can be carried out without an adverse impact on the integrity of any European Site, subject to further assessment at project level where required.</p> <p>The Strategy protects existing woodland. It proposes considerable increase in woodland planting and avoids woodland creation on other valued habitats. The TWSEL supports the Central Scotland Green Network by increasing woodland habitat and encouraging increased access to some woodlands.</p>

¹ The SEA documents for the East Lothian Local Development Plan 2018 and the plan itself can be downloaded following the links from https://www.eastlothian.gov.uk/downloads/download/13023/local_development_plan_2018

<p>Population <i>Overall objective:</i></p> <p><i>Maintain or enhance the quality of life for all East Lothian's residents</i></p>	<ul style="list-style-type: none"> • <i>Mitigate the effects of population growth</i> • <i>Reduce the impact of inequality – older people, protected characteristics, lower SIMD areas</i> • <i>Support rural employment</i> 	<p>The TWSEL will mitigate the effects of population growth through helping to integrate new development into the landscape and providing more potential for outdoor recreation. It also aims to increase canopy coverage in urban areas.</p> <p>This will help mitigate the impact of inequality through improving urban environments especially those in lower SIMD areas.</p> <p>The actions in the Economy theme will help support rural employment.</p>
<p>Human Health <i>Overall objective:</i></p> <p><i>To maintain, or provide opportunities to improve, human health</i></p>	<ul style="list-style-type: none"> • <i>Help create vibrant, healthy and safe places and community, support good mental well-being and maintaining a healthy weight through physical activity</i> • <i>Flourishing in early years: increase opportunities for young people to experience play in woodland</i> • <i>Reduce health impact from woodland and forestry operations</i> • <i>Reduce the impact of noise</i> 	<p>The impact of the TWSEL is positive in terms of creation of vibrant communities, as the increase in woodland in urban areas, and woodland creation in rural areas, will improve amenity and opportunity for woodland recreation. It also increases opportunities for play in a natural environment.</p> <p>TWSEL includes advice on appropriate species to avoid increasing allergen exposure and creation of ground level ozone.</p>
<p>Soil <i>Overall objective:</i></p> <p><i>To maintain or improve soil quality, quantity and function</i></p>	<ul style="list-style-type: none"> • <i>Conserve the food production capability of land</i> • <i>Maintain soil quantity and quality</i> 	<p>The TWSEL aims to avoid loss of agricultural productivity. Agricultural land is identified as 'Potential - Farmland' on the Sensitivity mapping, with policy that woodland creation should support agricultural production.</p> <p>The value of trees to prevent soil erosion is noted and their use to achieve this aim supported. The value of soil mycorrhiza is noted and supported. The TWSEL supports restoration of peatland over woodland creation in areas where this would be possible.</p>

<p>Water</p> <p>Overall objective</p> <p><i>Protect and improve the water environment and reduce flood risk</i></p>	<p><i>Reduce flood risk</i></p> <p><i>Protect or enhance water quality</i></p> <p><i>Maintain quantity of water</i></p>	<p>Overall, the TWSEL is expected to improve the water environment and reduce flood risk. Creation of the Climate Forest is expected to reduce flood risk as trees slow down water run-off. The TWSEL promotes riparian planting which would generally improve water quality. Riparian planting can also reduce evaporation of water from water courses, protecting quantity of water.</p>
<p>Air</p> <p>Overall Objective</p> <p><i>To protect and enhance air quality and reduce exposure to poor air quality</i></p>	<p><i>Help improve local air quality, particular in areas of elevated air pollution</i></p>	<p>The TWSEL supports increased tree and hedge planting, which improves air quality by removal of pollutants. Trees and hedges can also separate sensitive receptors from sources of pollution, which the TWSEL encourages.</p> <p>(see also 'Health' above)</p>
<p>Climatic Factors</p> <p>Overall objective</p> <p><i>To reduce harm from climate change by mitigation and adaptation</i></p>	<p><i>Mitigate Climate Change</i></p> <p><i>Support Climate Change adaptation</i></p>	<p>Through protection of existing trees and areas of woodland, and support for creation of new woodland, the TWSEL will help mitigate climate change. The TWSEL also aims to use tree and woodland to increase the resilience of East Lothian to impacts from climate change. It also seeks to guide East Lothian's woodland and tree stock overall to be resilient to climate change through policy, action, and advice on species choice. The TWSEL supports connectivity of woodland, which allows for climate migration of species northwards and uphill.</p>
<p>Material Assets</p> <p>Overall Objective</p> <p><i>Manage, maintain or promote the efficient, effective or appropriate use</i></p>	<p><i>Help to ensure forests and woodlands are sustainably managed</i></p> <p><i>Promote the circular economy</i></p>	<p>Policy 7 Sustainable Woodland Management of the TWSEL encourages sustainable woodland management. The Strategy encourages the circular economy for example through Policy 5 Wood Products which gives support for the use and retention of timber and wood products, as well as the use of wood products from recycled material.</p>

<i>of material assets</i>		
Cultural Heritage Overall objective <i>Preserve or, where appropriate, enhance East Lothian's historic environment</i>	<i>Avoid adverse impacts on heritage assets, including archaeological sites and monuments</i> <i>Protect and deepen the appreciation of East Lothian's historic woodlands and notable trees</i>	The TWSEL contains a section on Cultural Heritage which aims to celebrate the role of trees and woodland as part of our cultural heritage. It also aims to protect cultural heritage assets from harm from trees. The TWSEL has Policy 22 Notable Trees, which aims to protect these assets. Policy 25 aims to protect other valued elements of the historic environment. Elements of the historic environment are identified in the sensitivity mapping.
Landscape Overall objective <i>Protect and enhance East Lothian's landscapes and townscapes</i>	<i>Protect the diversity and value of East Lothian's Landscapes</i> <i>Improve and reinforce townscape character and sense of place</i>	The TWSEL has a chapter specifically aiming to improve landscape through tree and woodland planting. This includes proposals for landscape masterplans to address specific areas or issues, and protection of existing valued landscapes.

3. How the Environmental Report has been taken into account

3.1. The process of carrying out SEA has led to significant changes to the TWSEL, at different stages of its preparation. The process of drawing up the Scoping Report included checking through other plans and strategies, in particular the SEA of the Scottish Forestry Strategy. This led to several environmental issues being picked up for inclusion which might otherwise have been overlooked. These included:

- Identification of the potential for an increase in woodland to cause illness and disease in human beings, in particular allergies and tick-borne illness
- The potential for the planting of trees to cause climate change emissions due to disturbance of soil, or planting on inappropriate soil types
- The need to consider deer management issues

3.2. During the drafting of the Environment Report, changes were made to the TWSEL as issues were uncovered in an iterative process. Many environmental issues were already being addressed as they were among the main aims of the strategy. Some of the remaining issues raised and how they were considered are shown in the following table.

TABLE 4: Changes made to TWSEL as a result of drafting the Environment Report

Issues raised through SEA	Change made to TWSEL
Biodiversity	
Pheasants: breeding of pheasants for sport is a common use of East Lothian’s shelter belts. Although they are non-native, they are considered a game species rather than invasive non-native species. They can however have adverse impact on biodiversity especially ancient or native woodland	Pheasant breeding is a legal land use and not for the TWSEL to take a position on. Some text on rural diversification was added with a reference to the Game and Wildlife Conservancy Trust for advice on management. As this activity does not require consent from the Council the TWSEL has limited influence over it.
Some areas may contain great crested newts.	A sentence was added in the mapping section as a reminder that survey for protected species may be needed.
Population	
With regard to Action 1 Investigating Offsetting - noted that some communities may not wish to have more trees or woodland locally, for example because it has safety issues or issues of shading. This is especially important in areas of social housing where people may have limited choice over where they live.	Policy 18 Community Collaboration was added to encourage community collaboration in and around urban areas.
The SEA identified that there is little on children’s play in woodland in the TWSEL.	The TWSEL cannot encourage climbing trees, playing with sticks &c as this is a potential health and safety hazard. TWSEL encourages tree planting and woodland creation in and around towns which will provide additional opportunities for play within wooded areas as well as tree-related play and crafts.
Health	
Foraging was identified as a source of healthy food.	The Strategy does not aim to promote foraging as it may conflict with biodiversity objectives if too many people do it, although it does have advantages as a mitigation for cost of living. There are also potential health and safety issues with people eating poisonous plants. The Strategy does encourage fruit and nut growing.
The risk of tick bites and tick-borne disease may increase, including by expansion of woodland into settlement and increased habitat for deer.	We added a section to ‘Deer’ noting that Lyme disease in particular is a tick-borne illness. A link to the NHS Inform website was also added. The East Lothian Council Ranger Service carry out publicity with regard to ticks.
Soil	
Policy did not include avoidance of woodland creation on existing areas of peatland	Avoidance of woodland creation on existing peatland areas added to Policy 15.
Some towns may not have anywhere that is not farmland where accessible woodland could be created	Added wording on promoting access to existing woodlands before creation of new woodland on prime agricultural land.
If the TWSEL promotes access, Land Reform Act rights may make it hard to control subsequent	By opening up more woodland it is hoped the Strategy will spread demand as well as

damage e.g. path/soil erosion and compaction. Even though the Action 17 says 'where this doesn't harm the woodland'.	increasing it. Provision for monitoring added to SEA.
As mitigation for residual effects of planting (disturbance of soil) the strategy could support natural regeneration and notch planting of whips.	Reference to notch planting of whips has been included. Natural regeneration is supported over planting through policy.
Contaminated land remediation was identified as a potential benefit from woodland.	A sentence was added to the section on Vacant and Derelict land, noting tree planting can be used for remediation.
Preparation for tree planting may disturb and mobilise contaminants through the wider environment. The potential for hazard should be considered at the project level.	A warning about this has been added to the mapping section (Constraints for Woodland expansion)
Water	
For ideal river water quality, around half a watercourse should be open to sunlight with the rest in dappled shade. This could impact the choice of Target for riparian woodland.	The Target is maintained as trees can be on north side of watercourse where they do not cast shade. Note added to text on amount of tree canopy around watercourses.
Air	
The potential for forestry operations to cause air pollution was identified.	A section about forestry operations minimising pollution of air from climate forcing emissions was added to Policy 4. Pollution to water and air is covered in the UK Forestry Standard.
The TWSEL will consider where planting could be used to buffer pollutants from vehicle emissions and other sources, or around facilities used by vulnerable people, such as hospitals, schools and sports fields.	Schools, care homes, and sports fields were added to Action 21 on use of trees to improve air quality.
Trees can be an ozone precursor – see this article	Added advice to the Air Quality section that the characteristics of the tree with regard to emission of ozone precursors should be considered especially in busy urban areas.
Climate	
Action 22 should include something on making the Council's tree estate overall more resilient	Extra wording has been added in the supporting text to indicate this.
Heat stress will be an increasing issue with climate change.	This was included in the Design section – Tree and Design Action Group design advice and increased canopy cover will also help this.
Design to support energy efficiency (use of trees as windbreak to avoid heat loss).	Added a line in resilience section about use of trees to avoid the need for use of heating and cooling systems within buildings.
Material assets	
The effect of tree planting on the operation of roads and railways should be taken into account at project level when considering tree planting along strategic transport corridors.	Text added at paragraph 7.67 about not planting in verges and avoiding adverse impacts on these assets.
There is a risk to the built environment including damage to buildings, roads and pavements arising from an increase in trees in the urban area especially.	We have added a section under the Urban Tree Canopy on design and siting of trees which gives advice on avoiding this.

Tree planting could lead to increased biodiversity/recreational value of land, making extraction of minerals more difficult. Should prior extraction of minerals before tree planting/woodland creation be considered, as with development?	If mineral extraction were desirable the trees could be felled and replanted. Tree planting is not a valuable enough use that prior extraction of minerals would be viable if not worth it on its own merits.
The circular economy is not sufficiently covered in Policy 4 or Action 18.	Added text about tree tubes as these are a significant source of non-recyclable waste in tree planting operations. Added a reference to Policies 4 and 5 in the circular economy section. Added text to section on Tree Management Strategy to point this strategy towards considering the circular economy.
Cultural Heritage	
The traditional setting of towns and villages is not a designated cultural heritage asset (other than where they are Conservation Areas). Enhancing setting should be one of the benefits of the TWSEL, balancing growth of East Lothian with environmental benefit.	Appendix A 'Trees and Woodland in Settlements' has been added with commentary on important aspects of the setting of each settlement.
Landscape	
Pre-emptive felling of Ash trees in case they are affected by ash dieback, to allow an economic return as suggested by the Field Sports magazine at https://fieldsports-journal.com/fieldsports/shoot/what-about-woodland . The article noted the strong timber market as well as grants for woodland management and restocking could be an incentive.	This is not what we would wish people to do though recognise the economic incentive. We would end up with no ash at all as people pre-emptively fell. The TWSEL refers to Scottish Forestry and East Lothian Council advice on ash dieback.
The Sensitivity Mapping does not refer to Special Landscape Areas.	Tree and woodland information from the Special Landscape Area Statement of Importance has been added into the appropriate Landscape Character Area information in Appendix B.
The Sensitivity Mapping does not include Green Belt or Countryside Around Town Areas.	Information from the relevant SPG has been including in the Landscape Character Area information in Appendix B.

4. How the opinions expressed in response to invitation to the consultation authorities and the public to comment have been taken into account

4.1. How comments on the Strategy, and relevant comments from co-occurring consultations, were taken into account in forming the Strategy are set out in the Report on Consultation attached to papers for the meeting of the Council's Cabinet on 14 May 2024. This is available from the Members

Library Service for 31 May 2024, at

https://www.eastlothian.gov.uk/meetings/meeting/17182/members_library_service

- 4.2. NatureScot, Historic Environment Scotland, the Forth District Salmon Fisheries Board and Gifford, Dunpender and North Berwick Community Councils commented. Non-statutory organisations that gave comments were Dirleton Village Association, Gifford Community Woodland, Gullane Eco-Group, Sustaining North Berwick, Tranent Wombles and the Scottish Green Party of East Lothian. In terms of business, Alba Trees and Tillhill Forestry made comments. Eight members of the public wrote in with comments, and a further 75 individuals responded to the survey. A series of events were held across the area, and almost 90 people attended.
- 4.3. At the same time as the consultation on the Tree and Woodland Strategy, consultation was undertaken for the Evidence Report of the LDP. This included a programme of engagement with primary and secondary school children, seeking their views on what was important to them in their area. Some of the views expressed were relevant to the Tree and Woodland Strategy and these were also taken into consideration.
- 4.4. Comments were also made on the draft Environment Report. The Consultation Authorities were specifically consulted on the SEA through the SEA Gateway. In addition, views on the SEA were invited through the survey. Respondents were also asked two specific questions related to the environmental impact of the strategy.

Responses from the Consultation Authorities

NatureScot

- 4.5. NatureScot noted that as expected, most of the impacts of the TWSEL on SEA objectives were positive. They were content with the findings of the draft Environment Report on SEA objectives, and the mitigation measures proposed.
- 4.6. NatureScot offered comments on Biodiversity, Flora and Fauna. They agreed with the suggested mitigation of adverse impacts and suggest that a minimum of 100m buffer between planted woodlands and native and protected woodlands should be provided to reduce the spread of Invasive Non-Native Species.
- 4.7. As noted in the Report to Consultation, it is difficult to include a mapped buffer with regard to woodland in SSSIs as the Council does not have mapping of where that interest is, with some SSSIs including more than one habitat type. Instead, wording has been added to TWSEL paragraph 6.85 to indicate that a buffer is desirable. Additional text has been added at paragraph 6.30 of the Environment Report on this issue.
- 4.8. NatureScot also suggest that deer control is highlighted as a priority mitigation measure against increased habitat creation for deer. Additional text was added to the Environment Report in the Invasive Non-Native Species section, and also making clear deer management is mitigation for the effect of providing additional habitat for deer. The Strategy was amended to include further information on control of deer.
- 4.9. On soils, NatureScot note that they support the prioritisation of peatland restoration over woodland creation. This is the approach of the TWSEL and the effect was assessed in the Environment Report. NatureScot support and encourage the incorporation of woodland creation, such as hedgerows,

hedgerow trees and other habitats which support biodiversity within agricultural land; no change to the Environment Report was requested or made as a result of this.

- 4.10. For Landscape, NatureScot suggested an adequate buffer between planting and geodiversity sites to help mitigate against the impact of self-seeding trees within designated areas. This has not been done. Some geodiversity sites already include trees, such as Rammer Cleugh SSSI and the Garleton Hills SSSI. A buffer would not prevent seeds arriving from some pioneer species such as Rowan which are borne by birds. Policy 14 provides that woodland management, expansion, creation, removal, or restructuring should enhance and not harm geological sites. Given the low woodland coverage, and limited suitable sites in East Lothian, the Council concluded it would be preferable to approach this on a site-by-site basis rather than include a buffer.
- 4.11. NatureScot suggest considering Coastal Change Adaptation Plan Guidance. The TWSEL supports coastal mosaic planting which works to preserve natural features and ecosystems along the coast, in line with this Guidance.
- 4.12. On monitoring, NatureScot commend several sources of best practice guidance. They suggest that some indicators such as area of woodland are relevant for more than one topic. This is noted.

SEPA

- 4.13. SEPA did not comment on the Environment Report.

Historic Environment Scotland

- 4.14. Historic Environment Scotland were largely content with the approach to assessment and considered the baseline to be appropriately presented. HES agree with the overall findings of the significant effects and welcome the narrative assessment.
- 4.15. HES suggest that Listed Buildings should be included in the Scoping Table as designated historic assets with potential to receive direct visual effects and setting effects. This was Scoped out as there are a considerable number of Listed Buildings in East Lothian and it is not possible to assess these individually at the strategic stage. The potential for impacts on Listed buildings overall has been considered and it appears to have been an oversight that this was not included in the Scoping Table. Policy 25 on protection of the historic environment in the TWSEL specifically includes avoiding harm to listed buildings and their settings.
- 4.16. HES suggest that as project level mitigation, the effect on setting of all heritage assets, not just listed buildings and Scheduled Monuments should be considered. This has been changed as requested.
- 4.17. A minor change on the description of the contents of the Historic Environment Policy for Scotland was requested, and this was done. They note that the Scottish Government's 'Our Place in Time: the Historic Environment Strategy for Scotland' has been superseded by 'Our Past our Future' which was launched in 2023. This has been amended and the revised document checked for its environmental protection objectives.

Responses from the public

- 4.18. Most responses to the overall consultation on the Tree and Woodland Strategy were made via Survey 123 (an Arc GIS product).
- 4.19. The survey asked two questions specifically aimed at obtaining views on the draft Environment Report. The first was: “Could there be any significant environmental effects from the Tree and Woodland Strategy?”. This question was intended to gather the views of those who may not have had the time or inclination to read the Environment Report. There were 32 responses to the first question, three of which were just to say they had not read it or did not know. A further six said there would be positive effects or that it would be beneficial but were not specific as to why.
- 4.20. Secondly, the survey asked for any comments on the Environment Report specifically. The table below shows comments made on the draft Environment Report or environmental issues, and the Council’s response. Changes to the Environment Report and/or the Strategy as a result are noted

TABLE 5 Environmental effects of the draft TWSEL identified by members of the public in writing		
Environmental effect	ER response	TWSEL response
Helping to achieve Scottish Government tree planting targets	Considered in the draft ER. No further change needed.	The target was for two million trees to be planted, included in the draft consulted on. No further change.
Carbon sequestration boost	This was reported in the draft ER. No further change needed.	Climate mitigation section included in draft consulted on. No further change.
In Costa Rica woodlands planted near the coast change led to more rainfall. This would be good for East Lothian which seems to be getting drier (U13).	The Council has asked Scottish Forestry for comment on this matter as we do not possess the expertise to know if this could occur here but received no response.	The Strategy includes a desire for creation of a mosaic of habitat at the coast including more woodland. Using woodland to change weather patterns would probably need to be a national initiative and consulted on as a specific strategy aim. No change.
The Strategy does not go far enough and the climate crisis will worsen.	The effects on climate are reported in the ER. No further change needed.	The target of two million trees was set by the Council. The Strategy looks at more than just the climate crisis (it is required by legislation to seek multifunctional benefits). No change.
Wildlife/biodiversity	Biodiversity is considered as a chapter of the SEA. It was not clear in all responses mentioning this whether the respondent considered the effect to be positive or negative.	No change.
Planting monoculture will have devastating results (U16)	The benefits of diverse woodland are noted in the draft ER.	The Council agrees monoculture has detrimental impacts on wildlife and landscape. The strategy supports diverse woodland. However, retention

		and replacement of productive coniferous woodland on existing sites is supported. Where these sites are replanted they will not be of a single species overall due to UK Forestry Standard requirements, though they may be single species in sections. In practice the TWSEL will have limited influence over this as it is a landowner decision. No change.
Link nature, education, and sustainable travel	Unclear what is intended by this. No change.	All of these topics are included in the Strategy. No change.
Improved human health and well-being	Human Health is a chapter in the ER.	The community section notes that trees can have a positive impact on health and wellbeing. Mitigating poor air quality and avoiding impacts through pollen production are included. No change
Think about how to interlink woodland areas and how to travel between them.	The council does not currently have information on how people are accessing woodland sites and does not have the resource collect it. No change.	Improving connectivity of woodland is a target of the TWSEL. Travel between them (for people) is a matter for the Green Network Strategy and Core Path Plan.
Plastic pollution	Plastics are noted as pollutants (biodiversity section) and plastic tree tubes are specifically addressed. No change.	Reducing plastic waste associated with tree planting is in Policy 4. No change.
Opportunities for eco-tourism	Where actions encourage tourist or recreational uses this has been checked against the SEA receptors. No change.	The TWSEL discusses both recreational opportunities, hutting and low impact holiday accommodation. There can be adverse impacts even from 'eco-tourism.' No change
Interpretation should be kept to a minimum.	Text has been added recognising the potential adverse impacts of interpretation at paragraph 15.37.	Forming an Interpretation Plan has been included as an action. This would link new planting, support increasing knowledge of our woodlands and support their management and enjoyment. It would also cover Notable Trees. This would help make interpretation more effective.
Facilities should be low key.	The effect of development that TWSEL supports have been assessed.	Development would be considered through the LDP. No change.

	No further change needed.	
Sustainable purchasing	The effects of policies supported by the TWSEL are assessed elsewhere as they are not introduced by the TWSEL.	The TWSEL supports Scottish Forestry and council sustainable procurement policies. No change.
Network of jobs	The ER notes the effect on employment in the 'rural employment' section. No further change needed.	TWSEL has a section on Economy which addresses jobs. No change.
Improved air quality	The ER has a section on air quality. No further change needed.	The TWSEL has information on air quality and how trees and hedges can help. No change.
Offsetting pollution	The ER has a section on climate, Air, water and soil setting out the effects of the TWSEL on pollution of these receptors. No further change needed.	The TWSEL aims to reduce pollution through use of trees where possible. The TWSEL has an action that the Council will investigate offsetting its own emissions and help others to do so. No change.
Flood prevention	Considered in the 'Water' section. No further change needed.	The TWSEL considers natural flood risk management. No change.
Riparian buffers proposed are not enough to mitigate watercourse pollution from intensive farming. A buffer of 200m plus may be needed.	The effect of riparian buffers has been considered but not of increasing this to 200m. No further change.	The TWSEL follows SEPA on this matter. Riparian buffers are at 30m as recommended by SEPA. Much of East Lothian is prime agricultural land, which needs to be kept in use for its primary function of food production. No change.
Optimising land drainage especially with regard to vulnerable areas	Flooding is addressed in the ER; Potentially Vulnerable Areas are identified. This would need to be considered further at project level. No further change needed.	The TWSEL includes how trees can help address flood risk. Flooding would have to be examined at project level. No change.
There will be effects from the proposed Musselburgh Flood Protection Scheme (which involves the removal of some trees).	The potential Musselburgh Flood Protection Scheme is subject to Environmental Impact Assessment and the details of the impacts will be reported there.	The Musselburgh Flood Prevention Scheme will be considered under flood prevention legislation taking all relevant factors into account.
Need to regulate access by dog walkers	Text added to consider that the TWSEL is likely to increase access which could increase impact on woodland from dogs.	There is provision for dogs in the Land Reform (Scotland) Act 2003, and the scope for the Council to limit access by dog walkers is limited. The TWSEL tries to limit harm arising from dog walking in woodland through recommending good practice.

Farming use of slurry, muck and fertilisers should be restricted.	This issue is beyond the scope of the TWSEL and is therefore not assessed. No further change needed.	Riparian woodland can help address this diffuse pollution of rivers. This has been included in the TWSEL. However, in general this issue is beyond the scope of the Tree and Woodland Strategy. No change.
---	--	--

- 4.21. Some respondents noted that there would only be environmental effects if the strategy were actually delivered. A few mentioned the need for working with other organisations or further engagement, including with the Scottish Climate Action Network or local wildlife groups.
- 4.22. Only ten comments were made on the draft ER itself, almost all on the presentation rather than the content. One considered it too long for a lay person to grasp, even the Non-Technical Summary. This was looked at again with a view to reducing its length and improving its ‘readability’ score for the final version. One noted an Executive Summary would be helpful. The ER did have a Non-Technical Summary, which serves that function. The TWSEL itself did not have an Executive Summary, and this has now been included. One respondent requested that schematic presentation of diagrams not be used. We consider that for most people diagrams will aid understanding. We recognise that there were readability issues with the main ‘Vision, Aims and Targets’ diagram, though all of the information was also in the text. This was removed. One respondent said that the targets were too low. This comment seems to be likely related to the strategy rather than the draft ER. Lastly a forestry operator noted that they had no comments at that time but would like the opportunity to discuss later in the process.
- 4.23. A comment was made on how to avoid invasive species in woodland, including designing woodland to support a wide variety of wildlife and avoiding monoculture; local and sustainable sourcing of trees which will help reduce introduction of invasives and ensuring native plants are used. The TWSEL already encouraged designing woodland to be diverse, and to encourage local and sustainable tree sourcing. The Strategy supports use of native plants however in a changing climate species suitable for migration here are also encouraged. Some species make a significant contribution to our landscapes although they are not native to East Lothian such as Scots Pine. Some local productive coniferous forestry is supported, as a sustainable material much of which is currently imported. In gardens people may choose which trees they like and may choose exotic species, which can do better than native species in urban areas in any case as there tends to be less water availability and sometimes higher temperatures in urban areas.
- 4.24. The same respondent also noted that planting a mix of male and female plants will help with an increase in pollen counts, noting that in some areas urban planners mainly planted male plants to avoid having to deal with fruits, seeds &c. This increases pollen counts. This comment has been considered. Many tree species have both male and female parts on the same plant. We are aware that this has been a significant issue in parts of Japan, leading to some trees around towns being removed to avoid illness. Advice on this has been incorporated into the TWSEL along with the advice on which species to choose to avoid allergy issues, include cross-sensitisation with food allergies.
- 4.25. The Environment Report and Non-Technical Summary was made available at events but no comments were received on these documents specifically there. Some people raised environmental issues related to trees. The following table notes environmental issues raised where the TWSEL

could have an effect on the environment, positive or negative, and how/where the issue has been considered in the Environment Report

TABLE 6 Environmental Issues raised at events	
Issue raised	Environment Report response
Connectivity is important	Considered in Biodiversity section
Musselburgh Flood Protection Scheme should consider natural solutions first	This will be considered through the EIA of the scheme
Lack of species diversity in commercial forestry	The ER recognises this has been the case historically and notes the UK Forestry Standard now requires a greater mix
Genetic diversity is important	The ER notes that planted woodland could affect genetic diversity of existing woodland and that the Strategy is likely to lead to changes in genetic make up of woodland species due to new planting. The strategy supports natural regeneration which supports genetic diversity. The importance of connectivity for genetic diversity is also noted.
Woodland expansion should not be at the expense of another valued habitat	The TWSEL recognises this, and this is noted in the Biodiversity section of the ER
Hedges are important for biodiversity and climate	The ER notes that hedges are an East Lothian priority habitat and considers them in the 'non-designated biodiversity' section. The importance of hedges for connectivity is recognised. The ER noted lack of information on species, condition and location of hedgerows.
Conflict between carbon sequestration and biodiversity	The ER notes that faster growing conifers can have a faster impact, and that any commercial timber crop has benefits as carbon remains locked into the product.
Trees in towns can cause issues such as leaves making pavements slippery	The SEA process considered accidents related to trees including slipping on leaves, however this was scoped out due to small numbers involved.
Positive mental health benefits of woodland	The ER recognises the link between woodland and trees and mental wellbeing
Trees are valuable as windbreaks for development	The ER notes the effect of increased canopy coverage in energy efficiency in considering other strategies that promote energy efficiency including the Climate Change (Scotland) Act 2009
Fires in woods will become more damaging with hotter, drier summers	Issues with wildfires are considered under the Air topic in the ER though links to other topics are recognised. TWSEL Policy 7 on Sustainable Woodland Management includes managing woodland with regard to risk of wildfire.
Water preservation	Water quantity is considered in the 'Water' topic.
Increased woodland could lead to increase in fly tipping	Fly-tipping is illegal and not supported by the strategy. This was not considered in the ER, other than to note the the potential for fly tipping to cause soil contamination.

Lack of trees in new housing areas affecting the appearance of the areas and the towns they are in	This is considered in the ER in the following sections: Cultural Heritage ‘Traditional setting of Towns and Villages’ and in Landscape ‘Townscape and settlement character’.
--	--

5. How the results of any transboundary consultation have been taken into account

- 5.1. Section 14 of the SEA Act requires certain procedures where a responsible authority is of the opinion that the plan is likely to have significant effects on the environment of another European Member State.
- 5.2. Some of the receptors which could be affected by the Tree and Woodland Strategy are regional or global. These are in particular air quality, which can have regional effects, and climate emissions, which can have global effect. Many plans or projects, even very small ones, will have some impact on these receptors. The plan will contribute in a minor way to the meeting of Scottish Government emissions targets. It should also improve air quality but is unlikely to affect the meeting, or not, of statutory air quality targets. The effect that the plan might have, on its own, on other Member states is not considered significant. The Council therefore does not consider that this plan is likely to have significant transboundary effects, and therefore does not need to carry out these procedures.

6. The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives considered

- 6.1. As noted above, there were no reasonable alternatives considered. The Council sought multi-functional benefits from woodland in line with legislation to fulfil its statutory duty to promote sustainable forestry management, and to produce a Forestry and Woodland Strategy. The Strategy was also intended to guide the creation of East Lothian’s Climate Forest, which is an existing commitment arising from the Council’s Climate Change Strategy.
- 6.2. Overall, the TWSEL offers a good solution for woodland retention and creation, aiming to balance the protection of biodiversity with increasing public access to woodland. It is hoped that the strategy will help address the climate emergency and nature crisis and provide a more attractive and adaptable environment for East Lothian’s residents and visitors. The response from public consultation was generally very supportive. Most thought the targets are good, though some felt that they could be higher. The gist of opinion expressed were that the Strategy has all the right words and that it would be positive if it were now implemented.
- 6.3. The Strategy was discussed and approved at a meeting of East Lothian Council’s Cabinet on 14 May 2024. The minute of the meeting is available on East Lothian Committees webpages here: <https://www.eastlothian.gov.uk/meetings/meeting/17106/cabinet> . The reasons given by Councillors for approving the strategy included:
- The principles and practice within the Strategy would enhance East Lothian for generations to come, benefitting the environment and people’s health and wellbeing;
 - It will make East Lothian an even better place to live, work and visit;
 - The strategy is important in relation to planning decisions and in mitigating the impacts of climate change on local trees and woodland. There are benefits of woodland in a variety of areas such as carbon capture, drainage, and the local economy, as well as in enhancing urban spaces;

- Inclusion of references to volunteering, hedgerows and hutting, and raising awareness of woodlands as outdoor learning spaces are positive.

7. The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

7.1. Measures that will be taken to monitor the significant environmental effects of the Strategy are set out Chapter 18 of the Environment Report. Monitoring provisions for achieving the Targets of the Strategy are set out within its Delivery section. A report will be published at the end of years 3, 6 and 9 to show how the Strategy is progressing towards its targets, and its effects on the environment.

APPENDIX ONE: CONSULTATION ON DRAFT ENVIRONMENT REPORT

- A1. The main consultation took place from 19th June to 31 August 2023. Prior to the start of the consultation, Councillors and Community Councils were sent a copy of the draft Tree and Woodland Strategy and the Non-Technical Summary of the draft Environment Report. They were also given details of where the full Environment Report and other assessment documents would be found. Advance notice of the consultation was also given to recipients of the LDP Newsletter.
- A2. The documents were placed on the Council's Consultation hub website, in hard copy at John Muir House, Haddington (the Council's Headquarters) and were available by request from ldp@eastlothian.gov.uk. The statutory Notice advertising the strategy and the strategic environmental assessment was placed in the East Lothian Courier, the main newspaper circulating in the area. This informed the public of where the Tree and Woodland Strategy and draft Environment Report could be viewed, and invited comments.
- A3. The advertised start date was 13 June 2023 and end date 31 August 2023. Unfortunately, due to technical issues which came to light at a late stage the documents and survey could not go live on the Consultation Hub on the 13th June as planned, though the documents were available at John Muir House and also on request as advertised. The survey went live on 21 June 2023.
- A4. The link to the documents was sent to the SEA Gateway on 21 June 2023. In addition, a link to documents was sent to contacts in the consultation authorities and Scottish Forestry who had previously given comments.
- A5. A series of public events were held along with other council services, seeking the public's views on the Tree and Woodland Strategy. This was carried out as a joint consultation including early engagement on the Local Development Plan, the Local Heat and Energy Strategy, Poverty Strategy and Economic Development Strategy.
- A6. Exhibition boards were produced for the TWSEL consultation at these events. The display consisted of boards highlighting the TWSEL Targets and Vision and included a copy of the map of Native Woodland Opportunities. A paper copy of the Strategy and draft Environment Report were also available. Other supporting documents could be accessed via a laptop operated by staff at the event. The events were staffed by one or both of the main authors of the strategy. They engaged visitors and answered questions. They directed attendees to the East Lothian Consultation Hub where the documents could be read at their leisure, and encouraged them to complete the survey on the Hub. They also noted comments made by visitors to the events.

Figure 1 Exhibition boards at Dunbar and notes of some comments made at that event.



A7. These events were advertised in the East Lothian Courier, via posters distributed in each main town, and on the Council’s social media. A QR code on the posters linked to the consultation. A video was prepared for social media to advertise the Tree and Woodland Strategy specifically: see https://youtu.be/T7n_ZPaOKfY. The consultation was also advertised on the Council’s Trees, TPOs and Consent for Tree Works webpages, here: https://www.eastlothian.gov.uk/info/210547/planning_and_building_standards/12249/trees_tpos_and_consent_for_tree_works/2

A8. Events were held as shown in the following Table. A presentation was also made to Tranent Wombles on 26 July 2023 at the Community Hub on the High Street.

TABLE A1: Number of attendees at events		
Venue	Time	No. of attendees (approx.)
Brunton Hall, Musselburgh	13 June, 15.30 – 20.30	6
Hope Rooms, North Berwick	16 June, 12.00 – 16.00	18
Library, Haddington	19 June, 14.00 – 19.00	20
Library, Dunbar	22 June 16.30 – 20.30	18
Pennypit, Prestonpans	26 June 16.00 – 20.00	6
MECA, Musselburgh	27 June 12.00 – 18.00	10
Fraser Centre, Tranent	28 June 16.00 – 20.00	10
TOTAL		88

A9. Information on the consultation was sent to a mailing list developed for TWSEL of organisations the Planning Service considered might be interested in the commenting on the Strategy. In addition, it was publicised through an item in the Policy and Strategy Newsletter, sent to the LDP Mailing list. This comprises individuals who have asked to be put on the mailing list, which includes members of the public, planning agents, landowners, developers and others. It was also sent to the Area Partnerships and Community Councils.

A10. Posters advertising the consultation and the events were placed in the locations within settlements shown in the following Table.

TABLE A2: Poster Distribution							
Town	Locations						
Musselburgh	Library	Sports Centre	Brunton	Fisherrow Community Centre	MECLC	Tesco	Pinkie SPAR shop
Wallyford	Library						
Whitecraig	Shop						
Prestonpans	Library	Mercat Gait	Community Centre	Coop Railway Station	Coop Hawthorn Terr.	Coop Redburn Road	
Cockenzie	Library	Coop					
Tranent	Library	Loch Centre	Fraser Centre	Health centre			
Ormiston	Library						
Pencaitland	Notice board						
Macmerry	Shop						
East Saltoun	Notice Board*						
Gifford	Coop	Hall					
Garvald	Notice Board						
Humbie	Café/shop						
Stenton	Hall	Notice Board					
Spott	Hall						
Innerwick	Notice Board*						
Dunbar	Library	Town House	Notice Board	Coop B'field	Coop High St	Asda	Morrisons
West Barns	Shop						
Tynninghame	Notice Board in hut						
East Linton	Coop	Mart					
Whitekirk	Notice Board						
North Berwick	Library	Sports Centre	Tesco*	Coop	Loco	Hope Room	Notice Board
Dirleton	Notice Board*						
Gullane	Library	Coop					
Aberlady	Margiotta	Hall					
Longniddry	Community centre	Library	Coop				
Haddington	JMH reception	Aubigny Sports Centre	Tesco	Coop	Notice Board Exchange	Nungate community centre	
Athelstaneford	Notice Board						

**poster passed to controller of Noticeboard for decision on display*

A11. Posters were also placed in recreational sites with noticeboards managed by the Ranger service in the following locations: Longniddry bents 1,2,3; Gullane bents; Haddington to Longniddry Railway Walk at Cottyburn, Longniddry station and Gateside Road; Hopetoun.



Figure 2 Example poster

A12. Following a comment received through consultation that we should engage further with the commercial sector, information on the consultation and an invitation to submit views was sent to East Lothian sawmills as identified through web search, furniture makers and timber suppliers. This was sent on 31 October 2023 asking for comments by 17 November 2023.