

POST-ADOPTION SEA STATEMENT – COVER NOTE

PART 1

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or

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PART 2

A post-adoption SEA statement is attached for the PPS entitled:

Dumfries and Borders Forest District Strategic Plan 2009-2013

The Responsible Authority is:

The Forestry Commission Scotland (FCS)

PART 3


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Signature & date  24th May 2010

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1. BACKGROUND

Post-adoption SEA statement for:

Dumfries and Borders Forest District Strategic Plan 2009-2013

Adopted on:

1st January 2010

Responsible Authority:

Forestry Commission Scotland

2. INTRODUCTION

This document (referred to here as the post-adoption SEA statement) has been prepared in accordance with Section 18 of the Environmental Assessment (Scotland) Act 2005.

3. AVAILABILITY OF DOCUMENTS

WEBSITE

The full PPS as adopted, along with the Environmental Report and post-adoption SEA Statement are available on the Responsible Authority's website at:

www.forestry.gov.uk

OFFICE ADDRESS

The PPS, as adopted, along with the Environmental Report and post-adoption SEA Statement may also be inspected free of charge (or a copy obtained for a reasonable charge) at the principal office of the Responsible Authority:

Contact name, address and telephone number

Forestry Commission Scotland, Silvan House, 231 Corstorphine Road, Edinburgh, EH 12 7AT.

Times at which the documents may be inspected or a copy obtained:

Monday to Friday 0900hrs to 1700hrs.

To minimise delays for those wishing to view the documents we would be grateful if you could let us know when you would like to visit. Please telephone 0131 314 6156 or e-mail: fcscotland@forestry.gsi.gov.uk

4. KEY FACTS

Name of Responsible Authority	Forestry Commission Scotland (FCS)
Title of PPS	Dumfries and Borders Forest District Strategic Plan (DBFDSP) 2009 – 2013
Purpose of PPS	To deliver the national themes of the Scottish Forestry Strategy (SFS) through actions set out under local key issues.
What prompted the PPS (e.g. a legislative, regulatory or administrative provision)	The Dumfries and Borders Forest District Strategic Plan has been prepared in the context of the Scottish Forestry Strategy (2006) and the National Forest Estate Strategic Plan.
Subject (e.g. transport)	Forestry
Period covered	2009-2013
Frequency of updates	Every 5 years.
Area of PPS (e.g. geographical area)	Dumfries and Borders Forest District (including the local authority areas of the Borders and part of Dumfries and Galloway).
Summary of nature/content of PPS	The DBFDSP outlines how the forests will be managed to deliver the SFS Vision and Outcomes. The plan ensures that local issues are addressed together with national objectives by producing locally-specific policies in response to the seven national themes presented in the SFS.
Date adopted	1 st January 2010
Contact name & job title Address, email, telephone number	Nicol Sinclair Planning Manager Forest Enterprise Scotland 01786 222141 Nicol.sinclair@forestry.gsi.gov.uk
Date	24 th May 2010

5. STRATEGIC ENVIRONMENTAL ASSESSMENT PROCESS

The Dumfries and Borders Forest District Strategic Plan 2009-2013 has been subject to a process of Strategic Environmental Assessment (SEA), as required under the Environmental Assessment (Scotland) Act 2005.

The Dumfries and Borders Forest District was created by the amalgamation of the formerly separate Ayr and Scottish Borders Districts, following FES reorganisation in 2008. Draft Forest District Strategic Plans were produced for both, and these were subject to comprehensive SEA. The findings and alterations recommended in the relevant environmental reports have been taken into account in the production of the final plan and are detailed below.

The Strategic Environmental Assessment process has included the following activities:

- Taking into account the views of the Scottish Environment Protection Agency, Scottish Natural Heritage and the Scottish Ministers (Historic Scotland) regarding the scope and level of detail that was appropriate for the Environmental Report.
- Preparing an Environmental Report on the likely significant effects on the environment of the draft PPS which included consideration of:
 - the baseline data relating to the current state of the environment;
 - links between the PPS and other relevant strategies, policies, plans, programmes and environmental protection objectives;
 - existing environmental problems affecting the PPS;
 - the plan's likely significant effects on the environment (positive and negative);
 - measures envisaged for the prevention, reduction and offsetting of any significant adverse effects;
 - an outline of the reasons for selecting the alternatives chosen;
 - monitoring measures to ensure that any unforeseen environmental effects will be identified allowing for appropriate remedial action to be taken.
- Consulting on the Environmental Report which was undertaken in March 2008 for a period of 8 weeks.
- Taking into account the Environmental Report and the results of consultation in making final decisions regarding the PPS.
- Committing to monitoring the significant environmental effects of the implementation of the PPS. This will also identify any unforeseen adverse significant environmental effects and to enable taking appropriate remedial action.

6. HOW ENVIRONMENTAL CONSIDERATIONS HAVE BEEN INTEGRATED INTO THE DUMFRIES AND BORDERS STRATEGIC PLAN AND HOW THE ENVIRONMENTAL REPORT HAS BEEN TAKEN INTO ACCOUNT

Forest District Strategic Plans sit within a wider policy framework which includes the Scottish Forestry Strategy, the National Forest Estate Strategic Plan and Forestry Commission guidelines and policies. The DBFDSP states that ‘the National Strategic Plan describes the strategic and operational context, monitoring framework and implementation proposals that guide the district strategic plan’.

This national policy context denotes that Forest District Strategic Plans have been developed within a framework which clearly defines environmental, economic and social priorities for the forest sector and which provides equally clear safeguards to guide environmental management. It therefore follows that while each Forest District has analysed locally significant issues and priorities they have ‘inherited’ national policy priorities and, in implementation, will have a duty to ensure high environmental standards.

The SEAs of the Draft Ae and Scottish Borders FDSPs took into account this wider framework however several environmental issues were highlighted particularly in relation to non-forestry activities and land disposal and acquisition. As a result it was recommended that wherever practical further safeguards should be reflected in modifications to the FDSP prior to final adoption. Table 6.1 below sets out the key findings raised in the Environmental Report and explains whether they are addressed adequately within the National Forest Estate Strategic Plan (which has also been subject to SEA) or other Forest Enterprise policies and where any additional amendments were made to the DBFDSP to ensure a robust approach to the avoidance of negative environmental impacts.

TABLE 6.1

SEA issue	Existing problem?	Impact of Forest District Strategic Plan	Proposed measures for the reduction/prevention and offset of significant adverse effects	Implications of policies contained in FES Framework Strategic Plan	Modification to the DBFDSP or reason for not having taken this into account
Biodiversity	Overall decline in biodiversity, sensitivity of international, national and locally important nature sites. Potential impacts of climate change.	Renewable energy and Non-timber sources of income policies could result in disturbance or damage to habitats	The policies should be expanded to ensure the development of renewable energy schemes and enhanced leisure facilities do not have an adverse impact on biodiversity	<i>The FSP provides assurance that environmental issues will be taken into account in relation to renewable energy projects. It would be beneficial to reflect this approach within the finalised FDSP and, given the emphasis on increasing income from non-forest activities, extend this approach to other forms of development or land use change on the Forest Estate.</i>	New policy 1.01 to maximise the potential for wind farms ‘while balancing community and environmental interests’.
Biodiversity	Overall decline in biodiversity, sensitivity of international, national and locally important nature sites.	Access and health policies could result in an increase in disturbance and damage to habitats as a consequence of increased levels of recreation activity in forests. Tourism and access policies may cause localised disturbance of species and habitats through increased public use of the forest resource	The plan should note the objective of steering recreation activity to those areas which are at least risk of damage from recreation. FCS should work with SNH and Access Authority to ensure that access developments result in a net enhancement of biodiversity. Environmental quality policies should ensure that non-forestry activities, including access promotion and management, do not have a significant adverse impact on biodiversity. Tourism and access policies should be amended to ensure that access and recreation are sustainably promoted and managed to ensure adverse effects on biodiversity are minimised	<i>FSP includes commitment to carry out research into the environmental impacts of recreation on the forest estate.</i>	New text under ‘access and health’ to address disturbance and erosion through assessments and appropriate management.

SEA issue	Existing problem?	Impact of Forest District Strategic Plan	Proposed measures for the reduction/prevention and offset of significant adverse effects	Implications of policies contained in FES Framework Strategic Plan	Modification to the DBFDSP or reason for not having taken this into account
Biodiversity	Overall decline in biodiversity, sensitivity of international, national and locally important nature sites.	Timber quality and timber supply policies may affect biodiversity through the continued concentration on exotic conifers	<p>These policies should be cross-referenced with biodiversity policies to ensure that natural heritage benefits are considered through the forest design process. This represents an opportunity to strengthen the plan.</p> <p>The adoption of lower impact silvicultural systems is likely to yield biodiversity benefits, mitigating the impact of exotic conifers</p>		New and extended text within the Biodiversity section concentrating on developing conifer forests as ecosystems in their own right.
Biodiversity	Overall decline in biodiversity, sensitivity of international, national and locally important nature sites.	Community development policies could have a negative impact on biodiversity through disposal of FE land for affordable housing	Policies should be expanded to ensure that any allocation of land for affordable housing under the NFLS will minimise effects on biodiversity. The FDSP should require any proposed community development to adhere to wider FCS social and environmental aims	<i>The FSP includes a requirement for Appropriate Assessment to ensure that the integrity of Natura 2000 sites is not adversely affected</i>	No modification to the DBFDSP as FCS decides whether or not to sell land based on the public benefit which is scored around social and environmental considerations.
Population and human health	Negative effects on communities from road-based timber haulage	Renewable energy – particularly the development of woodfuel markets – may result in increased use of road haulage to move forest products to processors and generating stations	<p>This policy should be cross-referenced with the timber transport policy to ensure best practice is applied to woodfuel haulage.</p> <p>Policies should ensure that the climate change mitigation benefits of biomass generation are not outweighed by increased road haulage</p>		New Timber Transport policies to reduce the environmental impacts of haulage.

SEA issue	Existing problem?	Impact of Forest District Strategic Plan	Proposed measures for the reduction/prevention and offset of significant adverse effects	Implications of policies contained in FES Framework Strategic Plan	Modification to the DBFDSP or reason for not having taken this into account
Population and human health		<p>Non-timber sources of income may impact on the access and recreation potential of the forest resource, resulting in diminished quality of life values. May also negatively affect tourist revenues</p>	<p>This policy should be amended to state that any business development will aim to minimise negative effects on scenic or amenity values. Any development should also be required to conform to wider FCS social and environmental standards</p> <p>Existing environmental protection policies should be amended to ensure that all potential uses of Forest Estate land are covered</p>	<p><i>The FSP provides assurance that environmental issues will be taken into account in relation to renewable energy projects. It would be beneficial to reflect this approach within the finalised FDSP and, given the emphasis on increasing income from non-forest activities, extend this approach to other forms of development or land use change on the Forest Estate.</i></p>	<p>New policy 3.17 under Business Development to consider new business ideas based on ‘our wider social and environmental standards’.</p>
Population and human health		<p>Land use change as a result of portfolio analysis may have negative impacts through loss of amenity, visual intrusion or alteration of economic activity</p>	<p>This policy should be amended to ensure that any restructuring of the forest resource has no negative effects on communities, and that any development or disposal of land should conform to wider FCS social and environmental standards</p>	<p><i>The FSP provides some clarification on land disposal and acquisition, for example by prioritising examples which will contribute to WIAT objectives.</i></p>	<p>No modification to the DBFDSP as FCS decides whether or not to sell land based on the public benefit which is scored around social and environmental considerations.</p>
Population and human health		<p>Renewable energy and new wood energy business policies could have a detrimental effect on communities through visual intrusion and damage to access, with clear implications for leisure and tourist markets</p>	<p>Policies should be cross-referenced to ensure that conflict between social objectives is minimised and that no proposed business ventures on the Forest Estate will significantly hamper access or impair enjoyment of the forest resource.</p>	<p><i>The FSP provides assurance that environmental issues will be taken into account in relation to renewable energy projects.</i></p>	<p>New policy 3.17 under Business Development to consider new business ideas based on ‘our wider social and environmental standards’.</p>

SEA issue	Existing problem?	Impact of Forest District Strategic Plan	Proposed measures for the reduction/prevention and offset of significant adverse effects	Implications of policies contained in FES Framework Strategic Plan	Modification to the DBFDSP or reason for not having taken this into account
Population and human health		New wood energy business policy could affect communities through increased road transportation of forest products to and from processors/end users	Negative effects can be reduced by cross-referencing with the timber transport policy which seeks to minimise the social impacts of haulage vehicles.		New Timber Transport policies to reduce the environmental impacts of haulage.
Population and human health		Portfolio analysis could affect communities through land use change, potentially harming amenity values with detrimental effects on quality of life (especially where tourism is economically significant)	Policy should be strengthened to ensure that any changes of land use proposed as an outcome of portfolio analysis has a neutral or better effect on local communities, and that any development conforms to wider FCS social and environmental standards	<i>The FSP provides some clarification on land disposal and acquisition, for example by prioritising examples which will contribute to WIAT objectives</i>	FCS decides whether or not to sell land based on the public benefit which is scored around social and environmental considerations.
Water and soil	Damage to the water and soil environments	Tourism and access policies may have negative effects through increased erosion of the forest path and riding network, as a result of increased foot and cycle traffic	<p>These policies should stress the importance of the sustainable promotion and management of access to woods and forests</p> <p>Existing environmental quality policies should be strengthened to cover all potential uses of the Forest Estate, including leisure and recreation activities</p>	<i>FSP includes commitment to carry out research into the environmental impacts of recreation on the forest estate. The FSP states a requirement to comply with Forestry Commission Soil and Water Guidelines, though there it is recommended that this approach should be extended to non-forestry activities promoted or facilitated by FES on the Forest Estate.</i>	New text under 'access and health' to address disturbance and erosion through assessments and appropriate management.

SEA issue	Existing problem?	Impact of Forest District Strategic Plan	Proposed measures for the reduction/prevention and offset of significant adverse effects	Implications of policies contained in FES Framework Strategic Plan	Modification to the DBFDSP or reason for not having taken this into account
Water and soil	Damage to soils	<p>Renewable energy, steeper sites, access, business development and community development</p> <p>The lack of a strong soil protection policy, and lack of policy coverage for non-forest operations, creates the potential for negative effects on the soil environment</p>	A robust soil protection policy should be drafted under the Environmental Quality theme, applicable to both forestry and non-forestry activities, development or operations	<i>The FSP states a requirement to comply with Forestry Commission Soil and Water Guidelines, though there it is recommended that this approach should be extended to non-forestry activities promoted or facilitated by FES on the Forest Estate.</i>	Policy 6.02 to implement the soils guidelines.
Air	Diminishing air quality	The development of the hardwood sector may result in increased road haulage as hardwood processors are less common and more widely distributed	<p>This policy should be cross-referenced with the timber transport policy to ensure best practice in haulage.</p> <p>The Forest District should also concentrate on developing local markets for these timber products to reduce overall transport distances</p>		New Timber Transport policies to reduce the environmental impacts of haulage.
Air	Diminishing air quality	The development of the tourist industry may also increase emissions through private car use in accessing the Forest District	<p>Tourist facilities should prioritise public and non-vehicular modes of transport where possible.</p> <p>This situation is hampered by the fact that much of the Borders are not well served by public transport links</p>		New policy 4.02 to 'work with local authorities to develop and promote access to forests without needing a car'.
Air		New wood energy and timber supply policies may have detrimental effects on air quality	Woodfuel policies should be cross-referenced with timber transport, air quality and wider climate change objectives to ensure that emissions saving created through the use of biomass for electricity generation are not negated by increased road haulage.		New Timber Transport policies to reduce the environmental impacts of haulage.

SEA issue	Existing problem?	Impact of Forest District Strategic Plan	Proposed measures for the reduction/prevention and offset of significant adverse effects	Implications of policies contained in FES Framework Strategic Plan	Modification to the DBFDSP or reason for not having taken this into account
Landscape	Detrimental effects on landscape quality	Renewable energy and non-timber sources of income developments may damage landscape quality, with knock-on effects for the leisure and tourist industries	<p>This policy should ensure that developments of this nature are steered away from areas of high landscape value. The policy should also state that no developments of this nature will be considered where they would have a negative effect on landscape character.</p> <p>Such developments are subject to planning consent and often EIA, thereby conferring an additional layer of protection for the landscape</p>	<p><i>The FSP provides assurance that environmental issues will be taken into account in relation to renewable energy projects.</i></p> <p><i>It would be beneficial to reflect this approach within the finalised FDSP and, given the emphasis on increasing income from non-forest activities, extend this approach to other forms of development or land use change on the Forest Estate.</i></p>	Addition to the renewable energy policy to ensure balancing with community and environmental interest. New policy 3.17 under Business Development to consider new business ideas based on 'our wider social and environmental standards'.
Landscape	Detrimental effects on landscape quality	Efforts to improve timber supply will require continued clearfelling in areas of mature timber, causing localised damage to landscape values. Equally, the continued concentration on exotic conifers (esp. Sitka spruce) is not as beneficial to the landscape as planting native species	Timber operations should comply with existing District and FCS guidelines. However, negative effects should be mitigated by wider adoption of lower impact silvicultural systems and improvements in forest design		Extended policies on landscape to include landscape characteristics in long term forest planning and to develop low impact silvicultural systems. New text under 'Ecosystems' to advance conifers as ecosystems in their own right.
Landscape	Detrimental effects on landscape quality	Development of tourism facilities and infrastructure may have negative effects on the landscape	The policy should ensure that any tourism or recreation-related development conforms to the highest environmental protection standards and minimises impacts on the landscape	<i>FSP includes commitment to carry out research into the environmental impacts of recreation on the forest estate.</i>	The FSP covers this issue.

SEA issue	Existing problem?	Impact of Forest District Strategic Plan	Proposed measures for the reduction/prevention and offset of significant adverse effects	Implications of policies contained in FES Framework Strategic Plan	Modification to the DBFDSP or reason for not having taken this into account
Landscape	Damage to landscape quality	Renewable energy and new wood energy may have detrimental effects on scenic values and landscape character	<p>The renewable energy policy should be strengthened to ensure that development on the Forest Estate will minimise landscape impacts</p> <p>The landscape quality policy (and environmental quality policies in general) should be enhanced to ensure that non-forestry development minimise negative impacts on landscape quality</p>	<i>The FSP provides assurance that environmental issues will be taken into account in relation to renewable energy projects.</i>	Addition to the renewable energy policy to ensure balancing with community and environmental interest. New policy 3.17 under Business Development to consider new business ideas based on ‘our wider social and environmental standards’.
Historic Environment	Potential damage to the fabric and setting of cultural heritage sites	Development of renewable energy and other non-timber sources of income may conflict with the preservation of archaeological sites and their setting in the historic landscape	<p>Policies should seek to steer development away from areas of significant cultural heritage value, and undertake to have no negative effect on the historic environment</p> <p>Renewable energy developments (and other non-forestry development types) are subject to planning consent, which will convey an additional layer of protection to the historic environment</p>	<i>The FSP includes a suite of policies which address these concerns.</i>	Addition to the renewable energy policy to ensure balancing with community and environmental interest. New policy 3.17 under Business Development to consider new business ideas based on ‘our wider social and environmental standards’

SEA issue	Existing problem?	Impact of Forest District Strategic Plan	Proposed measures for the reduction/prevention and offset of significant adverse effects	Implications of policies contained in FES Framework Strategic Plan	Modification to the DBFDSP or reason for not having taken this into account
Historic Environment	Potential damage to the fabric and setting of cultural heritage sites	New woodland plantations and priority habitat restoration (e.g. native woodland, PAWS) will inevitably present some level of conflict with archaeological sites and monuments	<p>While compliance with 'Forests and Archaeology' guidelines is assumed, the cultural heritage policy should reinforce the need to protect heritage sites during forest operations. It should also require full, professional, archaeological survey during the planning stage of any afforestation programme, to ensure that subsequent forest design takes heritage into account</p> <p>Similarly, natural regeneration of ancient and native woodland areas should be actively managed to ensure that trees do not become established on archaeological sites and monuments</p>	<i>The FSP includes a suite of policies which address these concerns</i>	New and extended cultural heritage policies to ensure the protection of cultural heritage resources.
Historic Environment	Potential damage to the fabric and setting of cultural heritage sites	Access and health policies may increase pressure on cultural heritage sites through growth in visitor numbers	<p>Policies should be amended to promote sustainable, responsible and well-managed access to cultural heritage sites. While it is important that interpretation and access opportunities are pursued, the long-term survival of sites must be prioritised</p> <p>The cultural heritage policy should be amended to ensure that archaeological sites are adequately protected from leisure and recreation activities</p>	<i>The FSP includes a suite of policies which address these concerns</i>	New and extended cultural heritage policies to ensure the protection of cultural heritage resources.
Historic environment	Loss or degradation of cultural heritage sites	Catchment management, new productive woodlands, renewable energy, new wood energy policies have the potential for negative effects on the historic environment	<p>Policies should be amended to ensure that development, activity or operations on Forest Estate land will minimise negative effect on cultural heritage sites.</p> <p>The cultural value policy should be strengthened by ensuring that non-forest operations are also covered, and that full archaeological surveys are required in advance on any development or significant operation</p>	<i>The FSP includes a suite of policies which aim to conserve, manage and interpret the historic environment</i>	New and extended cultural heritage policies to ensure the protection of cultural heritage resources.

SEA issue	Existing problem?	Impact of Forest District Strategic Plan	Proposed measures for the reduction/prevention and offset of significant adverse effects	Implications of policies contained in FES Framework Strategic Plan	Modification to the DBFDSP or reason for not having taken this into account
Historic environment	Degradation of cultural heritage sites	Access policies could have detrimental effect on sites and monuments if access is not controlled and sustainable	Damage to sites can be limited through effective planning of access and, if necessary, consolidation and physical protection (likely to be outlined in SAM management plans)	<i>The FSP includes a suite of policies which aim to conserve, manage and interpret the historic environment. The FSP also includes a commitment to research the impacts of recreation on the historic environment.</i>	New and extended cultural heritage policies to ensure the protection of cultural heritage resources. New text in relation to recreation development ensuring measures to minimise environmental impact.
Historic environment	Lack of protection for unscheduled sites	Cultural value policy currently offers no specific protection to unscheduled monuments, whether known or not	The policy should be strengthened to cover all aspects of cultural heritage and ensure that unscheduled and newly-discovered sites are afforded sufficient protection from forestry and non-forestry operations and activities alike	<i>The FSP includes a suite of policies which aim to conserve, manage and interpret the historic environment</i>	New policy 6.08 to 'record known unscheduled monuments'.

7. How opinions expressed during the consultation have been taken into account

The sections below detail the comments received during the SEA process from the consultation authorities (Table 7.1) and those from the general consultation on the Consultative Drafts of the Ae and Scottish Borders Plans (Table 7.2). In Table 7.1, where relevant, the issues raised in the SEA of the National Forest Estate Strategic Plan and the SEAs of other forest district strategic plans have also been included.

TABLE 7.1 –LISTS CONSULTATION AUTHORITY RESPONSES AND SETS OUT HOW THEY HAVE BEEN TAKEN INTO ACCOUNT

CONSULTEE / RESPONDENT (ALPHA ORDER BEGINNING WITH THE CONSULTATION AUTHORITIES)	SUMMARY OF COMMENTS	HOW THE COMMENT WAS TAKEN INTO ACCOUNT IN MAKING THE DECISION TO ADOPT THE FINAL PPS
Scottish Environment Protection Agency	Further consideration should be given to environmental protection objectives set at international, EU and member state level – should include main Directives and national statutory instruments which implement them	The Dumfries and Borders Forest District Strategic Plan is in line with the National Forest Estate Strategic Plan which sets the context as regards national and international environmental protection objectives and includes implementation of important standards and national best practice guidelines. NFESP Amendments: Text amended
	Inclusion of a soil protection policy is vital (as per ER recommendations), as stipulating adherence to Soils and Water guidelines is insufficient mitigation.	Policy 6.02 to implement the soils guidelines. NFESP Amendments: Note climate change action plan mentions that the woodland expansion rationale sets out that FES should move away from peat based soils for woodland expansion. Climate action plan makes various references to protecting soil through management activities and areas of concern that warrant more attention. Note also that the guidelines are being revised to develop a more updated series.
	Tourism / eco-tourism could have negative effects on soil & water, material assets and air objectives due to increases in visitor numbers, the amount of travel involved and the amount of waste generated	Various policies to minimise negative environmental impact and policy 4.02 to 'promote access to forests without needing a car'.

CONSULTEE / RESPONDENT (ALPHA ORDER BEGINNING WITH THE CONSULTATION AUTHORITIES)	SUMMARY OF COMMENTS	HOW THE COMMENT WAS TAKEN INTO ACCOUNT IN MAKING THE DECISION TO ADOPT THE FINAL PPS
	Release of land for development could have potential negative impacts on soil and water objectives – mitigation ensuring sensitive location and sufficient infrastructure (e.g. sewerage) provision.	New policy 3.17 to be open to new business ideas that ‘match our wider social and environmental standards’.
The Scottish Ministers (Historic Scotland)	No substantive comments	
Scottish Natural Heritage		
	New Wood Energy policy needs to minimise the potential effects of development in this sector on timber transport and emissions (applicable to human health, climate change and air quality objectives).	Revised wood energy text and policy focuses on reducing the timber transport requirement by supplying local markets of wood for energy.
	ER should more strongly reflect FES’s responsibilities in relation to the Tweed SAC under the Habitats Directive. Stronger recognition of the designated features of the Tweed would be welcomed, along with the appropriate management and assessments in relation to those features	Environmental quality and biodiversity policies reflect the importance of the Tweed SAC, and obligations within the EU Habitats Directive and the Water Framework Directive.
	ER and hence the FDSP should place more emphasis on watershed management, riparian/wetland management/restoration; upland runoff and attenuation Should be considered in line with the Water Framework Directive, Solway-Tweed River Basin Management Plan and the Tweed Catchment Management Plan – strong biodiversity AND flooding benefits.	Environmental quality and biodiversity policies reflect the importance of the Tweed SAC, and obligations within the EU Habitats Directive and the Water Framework Directive.
SNH comments on National Forest Estate Strategic Plan and other FDSPs which are also relevant to Dumfries and Borders Forest District		
Theme	Comment	DBFDSP Amendments
Climate change	Recognise the role of soils as carbon stores	Mention of carbon stores under Renewable Energy.
	Add a clearer statement to theme regarding working with natural processes in adapting to climate change (e.g. flood plain restoration)	New text under flood and catchment management relating to the role and impact of forest management practices on catchment management.
Access and Health	Should include a recognition of need for varied access provision to suit differing requirements of the population (challenging as well as shorter, more convenient routes)	New policies to for recreation including increasing the use of facilities and reviewing how they meet diversity and equality aims. New policy 5.10 for ‘appropriately scaled and located all abilities facilities’.

CONSULTEE / RESPONDENT (ALPHA ORDER BEGINNING WITH THE CONSULTATION AUTHORITIES)	SUMMARY OF COMMENTS	HOW THE COMMENT WAS TAKEN INTO ACCOUNT IN MAKING THE DECISION TO ADOPT THE FINAL PPS
	Need more active promotion of Core Paths, the SOAC and the wider access network, in conjunction with local authorities	Text and policies supporting core paths.
	Should include a commitment to safeguard paths where possible	Text and policies supporting core paths, trails and recreation facilities.
	Access, health and tourism policies should be amended to, where possible, prioritise non-motorised and public transport for visitors to the NFE.	New policy 4.02 to 'promote access to forests without needing a car'.
Environmental Quality	Need to acknowledge the importance of soils as carbon sinks AND a potential source of Green House Gases.	Mention of carbon stores under Renewable Energy.
	Cultural heritage section focuses on built heritage, but should also include references to 'living cultural heritage' e.g. veteran trees, anthropogenic vegetation patterns (e.g. wood pasture, coppice) relating to ancient patterns of woodland and landscape management	Cultural heritage section includes 'heritage trees'.
	Inclusion of a soil protection policy is vital	Policy 6.02 to implement the soils guidelines.
Biodiversity	No clear objectives are given for native woodlands that are not AW, PAWS or designated sites. Important as components of habitat networks and often in poor condition	New policy 7.02 to develop the area of native woodland and assess the potential for its expansion.
	<p>Theme should be expanded to include geodiversity, as many sites are designated for their geological, as well as ecological, significance. Should also include Geological Conservation Review sites</p> <p>Plan should then deal with maintaining and enhancing geodiversity through access interpretation and promotion. Use Forest Design Plans to develop best practice for geological site management</p>	New policy and text on Geodiversity.

Changes to the DBFDSP arising from wider consultation

The Consultative Draft Forest District Strategic Plans for Ae and the Scottish Borders were subject to a period of consultation from which a number of comments were gained from a variety of organisations and individuals. These included positive comments on the delivery outcomes in relation to the SFS and praise for the acknowledgement of the multi purpose role of the forest estate. Further helpful comments were also made on the clarification of the types of designated areas and terminology to be used within the Plan.

A summary of responses has been prepared and is available on the Forestry Commission website www.forestry.gov.uk/fesplans

In finalising the amalgamated Dumfries and Borders Forest District Strategic Plan a number of amendments were made. The most substantial of which are outlined in Table 7.2 below.

TABLE 7.2 SUBSTANTIVE COMMENTS ON THE DRAFT DBFDSP AND FES RESPONSE

Consultation Comment	Amendment made to the Plan?
Opposition to further sitka spruce planting	New and extended text within the Biodiversity section concentrating on developing conifer forests as ecosystems in their own right.
Several comments relating to the need to mention the "Agreed Routes Map" which is set up and maintained by the Regional Timber Transport Group.	Added to the Planning Framework section of the Plan.
Need for more mention of reducing timber traffic on weak, single track roads and those through villages	Added
Inclusion of the potential of wildlife watching	Added
Consider the development of a Moorland Fringe programme	Added
More mention of priority species and obligations under the Habitats Directive	Added
More emphasis on sustainable water/watershed management – require more mention of water quantity rather than quality	Flood and catchment management policies strengthened to ensure forestry has a positive impact on catchment management.

FES concluded that no significant changes were made between the draft and finalised versions of the DBFDSP that would lead to a requirement to produce a revised Environmental Report.

8. Reasons for choosing the DBFDSP, in the light of other reasonable alternatives

Together with the assessment of the DBFDSP, nine alternative scenarios were developed and evaluated. These were:

- The ‘do-nothing’ option of continued implementation of the 2000 Forest District Strategic Plans. This option would not reflect the new SFS and progress that had been made since this time on certain key issues;
- Direct implementation of the Scottish Forestry Strategy at a District level. This option would not reflect local key issues and opportunities;
- Pursuing only one of the seven Scottish Forestry Strategy themes as a policy priority (e.g. implementing only climate change policies to the exclusion of all other objectives). This option would result in an imbalanced policy approach.

These alternative approaches highlighted the importance of balance in the Strategic Plan, as the effects of prioritising one policy area generally produced less positive results than a more rounded plan. Similarly, the 2007 plans for Ae and the Scottish Borders demonstrated significant progress over the 2000 versions and presented a more realistic and pragmatic solution than the local application of the Scottish Forestry Strategy. The DBFDSP also provided a more integrated and balanced approach than alternatives which prioritised one policy theme over the others.

9. Measures that are to be taken to monitor significant environmental effects of the implementation of the PPS

The National Forest Estate Strategic Plan identifies a suite of indicators under each of the seven topic areas (with data source, reporting intervals etc). It is proposed that progress towards these National Forest Estate Strategic Plan indicators will provide a monitoring outline for the Forest District Plan (as outlined within the Environmental Report). Although this monitoring will be undertaken at a national level it will reflect local trends and district issues. It is likely that these indicators will be reviewed every 10 years in line with the National Plan.

We also have to monitor against the indicators identified in Forest Enterprise Scotland’s framework strategic plan for the national forest estate. These will then be amalgamated across all ten forest districts to determine collective progress in delivering against the Scottish Forestry Strategy. These results will be published annually at national level.

10. Conclusion

We believe that the SEA process has assisted in developing a balanced DBFDSP. The District Plan itself, together with the wider policy framework of national strategy and guidelines will ensure that forestry in Scotland will contribute to sustainable development, benefiting the people of Scotland and protecting and enhancing the environment during the era of climate change.