

**POST-ADOPTION SEA STATEMENT – COVER NOTE**

**PART 1**

**To:** [SEA.gateway@scotland.gsi.gov.uk](mailto:SEA.gateway@scotland.gsi.gov.uk)

or

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

**PART 2**

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

Cowal and Trossachs Forest District Strategic Plan 2009-2013

**The Responsible Authority is:**

The Forestry Commission Scotland (FCS)

**PART 3**

**Contact name** Nicol Sinclair

**Job Title** Planning Manager

**Contact address** Forest Enterprise Scotland

**Contact tel no** 01786 222141

**Contact email** [Nicol.sinclair@forestry.gsi.gov.uk](mailto:Nicol.sinclair@forestry.gsi.gov.uk)

**Signature & date**  24<sup>th</sup> May 2010

**Blank page**

## 1. BACKGROUND

### Post-adoption SEA statement for:

Cowal and Trossachs Forest District Strategic Plan 2009-2013

### Adopted on:

1<sup>st</sup> 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](http://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](mailto:fcscotland@forestry.gsi.gov.uk)

#### 4. KEY FACTS

<b>Name of Responsible Authority</b>	Forestry Commission Scotland (FCS)
<b>Title of PPS</b>	Cowal and Trossachs Forest District Strategic Plan (CTFDSP) 2009 – 2013
<b>Purpose of PPS</b>	To deliver the national themes of the Scottish Forestry Strategy (SFS) through actions set out under local key issues.
<b>What prompted the PPS</b> (e.g. a legislative, regulatory or administrative provision)	The Cowal and Trossachs Forest District Strategic Plan has been prepared in the context of the Scottish Forestry Strategy (2006) and the National Forest Estate Strategic Plan.
<b>Subject (e.g. transport)</b>	Forestry
<b>Period covered</b>	2009-2013
<b>Frequency of updates</b>	Every 5 years.
<b>Area of PPS</b> (e.g. geographical area)	The Cowal and Trossachs Forest District (including the Loch Lomond and the Trossachs National Park).
<b>Summary of nature/content of PPS</b>	The CTFDSP 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.
<b>Date adopted</b>	1 <sup>st</sup> January 2010
<b>Contact name &amp; job title</b> <b>Address, email, telephone number</b>	Nicol Sinclair Planning Manager Forest Enterprise Scotland 01786 222141 Nicol.sinclair@forestry.gsi.gov.uk
<b>Date</b>	24 <sup>th</sup> May 2010

## 5. STRATEGIC ENVIRONMENTAL ASSESSMENT PROCESS

*The Cowal and Trossachs 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. This 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 COWAL AND TROSSACHS 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 CTFDSP 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 SEA of the Draft CTFDSP 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 CTFDSP to ensure a robust approach to the avoidance of negative environmental impacts.

**TABLE 6.1**

SEA issue	Existing problem?	Impact of CTFDSP	Proposed measures for the reduction/prevention and offset of significant adverse effects	Implications of policies contained in FES National Forest Estate Strategic Plan	Modification to the CTDSP or reason for not having taken this into account
Biodiversity	<p>Overall decline in biodiversity, sensitivity of international, national and locally important nature sites.</p> <p>Potential impacts of climate change.</p>	<p><b>Renewable energy and Non-timber sources of income</b> policies could result in disturbance or damage to habitats</p>	<p>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</p>	<p>The NFESP commits FES to give due consideration to the potential community and environmental effects of renewables schemes.</p>	<p>NATIONAL FOREST ESTATE STRATEGIC PLAN covers this issue.</p>
Biodiversity	<p>Overall decline in biodiversity, sensitivity of international, national and locally important nature sites.</p> <p>Potential impacts of climate change.</p>	<p><b>Access and health policies</b> could result in an increase in disturbance and damage to habitats as a consequence of increased levels of recreation activity in forests.</p>	<p>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.</p> <p>Environmental quality policies should ensure that non-forestry activities, including access promotion and management, do not have a significant adverse impact on biodiversity.</p>	<p>The NFESP includes a commitment for FES to undertake, in partnership with other agencies, research into the effects of access and recreation on the environments of the Forest Estate</p>	<p>NATIONAL FOREST ESTATE STRATEGIC PLAN covers this issue.</p>
Biodiversity	<p>Overall decline in biodiversity, sensitivity of international, national and locally important nature sites.</p>	<p><b>Community development policies</b> could have a negative impact on biodiversity through disposal of FE land for affordable housing</p>	<p>Policies should be expanded to ensure that any allocation of land for affordable housing under the NFLS will have no impact on biodiversity. The FDSP should require any proposed community development to adhere to wider FCS social and environmental aims</p>	<p>The NFESP includes policies which more clearly define the objectives of future land disposals and acquisitions E.g. prioritising examples which contribute to Forest Habitat Networks or WIAT objectives</p>	<p>NATIONAL FOREST ESTATE STRATEGIC PLAN covers this issue</p>

SEA issue	Existing problem?	Impact of CTFDSP	Proposed measures for the reduction/prevention and offset of significant adverse effects	Implications of policies contained in FES National Forest Estate Strategic Plan	Modification to the CTDSP or reason for not having taken this into account
Biodiversity	Overall decline in biodiversity, sensitivity of international, national and locally important nature sites.	<b>Biodiversity policy theme.</b> Requirement to ensure that the Strategic Plan, and lower tier PPS do not affect the integrity of internationally important biodiversity sites.	The strategy should be clarified to ensure that the integrity of internationally designated sites is not affected by operations or activities.	Requirement to ensure that the Strategic Plan, and lower tier PPS do not affect the integrity of internationally important biodiversity sites.	New Key Issue text on 'Designated Sites' (7.10) with the aim to <i>'make sure that 95% of features will be in favourable or unfavourable recovering condition classes by 2010 utilising management plans agreed with SNH'</i> .
Population and human health		<b>Renewable energy and timber</b> policies could have a negative effect on communities through increases in road haulage of timber and forest products	Policies should be cross-referenced with sustainable management and timber transport policies to ensure that vehicle movements are minimised and that any emissions reductions accrued through renewable energy are not negated by an increased reliance on road transport	The NFESP undertakes to give due consideration to the social and environmental effects of renewables proposals. The plan also prioritises sustainable timber transport solutions wherever possible	The FDSP includes a commitment to the development of a local woodfuel market to reduce the transport of timber and create opportunities for businesses to use woodfuel as an energy source.
Population and human health	Restriction of access to the Forest Estate	<b>Renewable energy and Non-timber sources of income</b> policies could result in a restriction of access to areas of the Forest Estate	These policies should be cross-referenced with Access and Health policies to ensure that any activities, development or operations on the Forest Estate are not detrimental to access, health and leisure objectives	As noted above, the NFESP undertakes to consider the social effects of proposed renewables schemes.	NATIONAL FOREST ESTATE STRATEGIC PLAN covers this issue

SEA issue	Existing problem?	Impact of CTFDSP	Proposed measures for the reduction/prevention and offset of significant adverse effects	Implications of policies contained in FES National Forest Estate Strategic Plan	Modification to the CTDSP or reason for not having taken this into account
Population and Human Health		<p><b>Non-timber sources of income</b> could have a negative effect on quality of life through visual intrusion, disturbance or degradation of the tourist industry</p>	<p>Policy should be strengthened to ensure that all activities, development and operations on the Forest Estate conform to wider FCS social and environmental standards</p>	<p>The NFESP provides assurance that community 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.</p>	<p>New text in relation to Rural Development (3.12) <i>'Be open to new business ideas that match our wider social and environmental standards and will consider positively proposals that will assist growth or development of local businesses'</i>.</p>
Water and Soil		<p><b>Renewable energy and non-timber sources of income</b> policies could have detrimental effects on the water and soil environments, as only forest operations are currently covered by the environmental quality policies</p>	<p>Environmental quality policies should be strengthened to ensure all activities on the Forest Estate are covered by the same environmental standards</p> <p>A robust soil protection policy should also be added to the Plan in order to extend more rigorous and specific protection to this resource</p>	<p>The NFESP undertakes to consider the environmental effects of renewable energy proposals, and reaffirms FES's commitment to the FC soils and water guidelines. However, it is recognised that further consideration must be given to the soil environment in future policy development.</p>	<p>New text on Rural development 3.12 <i>'Be open to new business ideas that match our wider social and environmental standards and will consider positively proposals that will assist growth or development of local businesses'</i>.</p>
Air		<p><b>Access</b> policies could result in increased emissions through people using private cars to access new leisure and recreation opportunities</p>	<p>Access policies should therefore be strengthened to ensure that public and non-motorised transport is prioritised wherever possible</p>	<p>The NFESP commits to commissioning research into the effects of access and recreation on the environment</p>	<p>NATIONAL FOREST ESTATE STRATEGIC PLAN covers this issue</p>

SEA issue	Existing problem?	Impact of CTFDSP	Proposed measures for the reduction/prevention and offset of significant adverse effects	Implications of policies contained in FES National Forest Estate Strategic Plan	Modification to the CTDSP or reason for not having taken this into account
Landscape	Damage to landscape quality	<b>Renewable energy and non-timber sources of income</b> policies could have detrimental effect on landscape quality through visual intrusion	<p>The renewable energy policy should be strengthened to ensure that no development on the Forest Estate will have negative landscape impacts</p> <p>These policies should be cross-referenced with the landscape quality (and other environmental protection policies) to ensure that all operations, whether forest related or not, conform to wider FCS social and environmental standards</p>	As previously noted, the NFESP undertakes to give due consideration to the environmental effects of renewable energy proposals.	<p>New text under Landscape 6.04 <i>'Continue to include landscape as a major consideration in long-term forest planning and undertake environmental impact assessments in sensitive areas'</i>.</p> <p>New text under Tourism (3.09) <i>'Continue to make sure that landscape is one of the key issues considered during the preparation of forest design plans'</i>.</p>
Historic Environment	Loss or degradation of cultural heritage sites	<b>Renewable energy</b> policies could have a negative effect on the fabric and setting of cultural heritage sites	<p>Policies should be amended to ensure that no development, activity or operations on Forest Estate land will have a negative effect on cultural heritage sites</p> <p>The cultural heritage 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>	In addition to introducing a suite of policies designed to improve protection for the historic environment, the NFESP also commits to giving appropriate consideration to the environmental effects of renewables development. Although professional advice will now be sought to ensure best practice, some minor concerns remain in relation to the effects of other non-forestry activities.	The Cultural Heritage policy (6.08) states <i>'pre-operational planning includes the assessment of archaeology on any site'</i> .

SEA issue	Existing problem?	Impact of CTFDSP	Proposed measures for the reduction/prevention and offset of significant adverse effects	Implications of policies contained in FES National Forest Estate Strategic Plan	Modification to the CTDSP or reason for not having taken this into account
Historic environment	Loss or degradation of cultural heritage sites	<b>Timber and habitat network</b> policies may have a detrimental effect on archaeology	Policies should be amended to ensure that no development, activity or operations on Forest Estate land will have a negative effect on cultural heritage sites (compliance with the Forests and Archaeology guidelines is assumed)  The cultural heritage 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	The NFESP introduces a number of policies which safeguard the historic environment. Amongst there is a commitment to employ and consult heritage professionals when producing management proposals or planning operations.	The Cultural Heritage policy (6.08) states ' <i>pre-operational planning includes the assessment of archaeology on any site</i> '.
Historic environment	Loss or degradation of cultural heritage sites	<b>Access</b> policies have the potential for negative effects on the historic environment	Access policies should be strengthened to ensure access to cultural heritage sites is managed in a sustainable fashion  The cultural heritage policy should be strengthened by ensuring that non-forest operations are also covered, and that full archaeological surveys are required in advance of any expansion of leisure and recreation infrastructure	Under the provisions of the NFESP, FES will consult with heritage professionals when deciding on management regimes. This will therefore protect any known, or newly-discovered, heritage assets.  The plan also undertakes to study the effects of access and recreation on the environment.	NATIONAL FOREST ESTATE STRATEGIC PLAN covers this issue
Historic environment	Lack of protection for unscheduled sites	<b>Cultural heritage</b> 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	The NFESP restores parity between types of environmental designation.	<i>All historic environment features will be recorded and considered as part of the Forest District historic environment database that the FCS archaeologist is working on with the Forest Districts. See also the publication "Scotland's Woodlands and the Historic Environment"</i> .

## 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 Draft of the CTFDSP (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
<b>Scottish Environment Protection Agency</b>	General comment on All FDSPs: 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	CTFDSP Amendments: Commitment at 6.01 to WFD and River basin management plans.  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.	CTFDSP Amendments: New text at 6.03 to ‘manage all works in accordance with FC water and 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.
<b>The Scottish Ministers (Historic Scotland)</b>	<b>No substantive comments</b>	
<b>Scottish Natural Heritage</b>	Relevant PPS table should refer to SNH ‘Natural Heritage Futures’ documents (notably ‘Forests and Woodlands’ and ‘Argyll West and Islands’)  LLTNP draft LBAP and LLT Forests and Woodlands Framework should also be added	SNH comment on CTFDSP Environmental Report 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
	ER baseline and FDSP should note: Deer numbers in District; European protected species; Invasive non-native species; LBAP species and habitats; SNH's Species Action Framework.	<ul style="list-style-type: none"> <li>Deer numbers – appendix 2 notes a reduction in deer numbers, although precise numbers not outlined here;</li> <li>Further details of protected species are noted as being in the district species action plans and conservation plan)</li> <li>Importance of SNH's Species Action Framework outlined under Theme 7: Biodiversity.</li> </ul>
	Need for licences for operations likely to disturb protected species (eg. Bats) should be highlighted in ERs	SNH comment on CTFDSP Environmental Report taken into account.
<b>SNH comments on National Forest Estate Strategic Plan which are also relevant to Cowal and Trossachs Forest District</b>		
Theme	Comment	Cowal and Trossachs FDSP Amendments
Climate change	Recognise the role of soils as carbon stores	Inclusion of the carbon storage function of soils under Theme 6 Environmental Quality
	Add a clearer statement to theme regarding working with natural processes in adapting to climate change (e.g. flood plain restoration)	New text on role of forests in flood and catchment management.
Business Development	The potential social effects of non-forestry developments on the National Forest Estate should be minimised through more explicit social criteria for such projects	New text 3.12 'be open to new business ideas that match our wider social and environmental standards'
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 text on the Disability Discrimination Act under Access and Health Theme.
	Need more active promotion of Core Paths, the SOAC and the wider access network, in conjunction with local authorities	New text on working with the National Park Authority and Argyll and Bute and Stirling Councils as a member of the Access Forums and in the delivery of a network of routes.
	Should include a commitment to safeguard paths where possible	New policy 5.06 to 'protect public rights of way'.
	Need to acknowledge the importance of soils as carbon sinks AND a potential source of Green House Gases.	New text on the role of forest soils for their 'filtering and transforming functions and for carbon storage' – no mention of GHGs.
Environmental Quality	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	The Introductory section of the CTFDSP notes that the heritage interest of the district includes important trees and woodlands including heritage trees. The relevant policy relating to this is covered within the 'Scotland's woodlands and the historic environment' publication.

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
Biodiversity	Should acknowledge the importance of transition habitats between woodland and open spaces (e.g. scrub, wood pasture, mosaic – these areas are also important in terms of cultural heritage)	New text recognising the importance of ‘edge zones’.
	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	All existing native woodland and all future native woodland creation will form part of the forest habitat network and managed to with conservation, recreation and landscape as key objectives. FHNs are mentioned throughout the FDSP.
	<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 text and policy on Geodiversity
	Need to monitor habitat fragmentation / connectivity (despite obvious difficulties)	New text under ‘Landscapes and Ecosystems’ relating to increasing the diversity of forest ecosystems and countering fragmentation.

### Changes to the CTFDSP arising from wider consultation

Table 7.2 below summarises the most substantive comments received on the consultative draft CTFDSP and sets out how they were taken into account in finalising the Plan. Individual responses can be viewed, on request, at the address shown in Section 3 of this Post Adoption Statement.

**TABLE 7.2 SUBSTANTIVE COMMENTS ON THE DRAFT CTFDSP AND FES RESPONSE**

Consultation Comment	Response	Amendment made to the Plan?
<b>General</b>		
Lack of links to key policy drivers – other local plans and strategies.	Strategic Plan cannot show linkages to all policy drivers. A list of supporting documents, guidance, standards referred to in the SP will be included as an appendix.	No – see response

Consultation Comment	Response	Amendment made to the Plan?
The National Park Authority would like to see a section in the text setting out how the National Park Authority and the Forest District will work together to deliver the common themes of the Strategic Plan and the National Park Plan.	Text describing how NP and FD work together is inappropriate – reference is made to NP Plan and the need for FD to help meet these objectives.	No – see response
The National Park Authority would also like to see a more spatial element to the Strategic Plan - increased spatial information is needed to make it a more user friendly document.	Spatial representation would indeed make it more user friendly, however the available page size would make the data difficult to present clearly and may lead to incorrect interpretation.	No – see response
The finalised Plan should also consider how people can follow themes through the document more easily e.g. biodiversity, landscape etc. The present document is not very user-friendly	Format changed to align with NFESP.	Yes
Sections 4 & 5 should be amalgamated to provide greater clarity.	Format changed to align with NFESP.	Yes
The Introduction, Forest Policy Context and Vision and Outcomes sections do not provide adequate local context in which to sit the Strategic Plan	Vision and outcomes are described at the local level in section 4.	No – see response
Figure 1.4 shows a generic representation of the planning framework but does not refer to all of the strategies/plans that should be used to inform the Forest District Strategic Plan both internally and externally at a District level.	Diagram does not attempt to list all plans etc, but these will be included as an appendix.	Yes
There are no overarching objectives for the plan. The inclusion of such objectives would better explain the purpose of the Strategic Plan and where it sits in the overall forest planning process.	The aim of the plan is stated in 1.1 and 1.2.	No – see response
We recommend that a spatial approach is adopted for illustrating information about the district, preferably by splitting the district up into recognisable areas such as The Trossachs, Cowal, Breadalbane etc	Difficult to show meaningful data at the scale available. The FDP is the scale at which this detail is more appropriate.	No - - see response
Land Reform (Scotland) Act 2003 and the Scottish Outdoor Access Code should be set out including how the management of the forest estate will be carried out with minimal impact on the public exercising their access rights and ensuring good information and advice is provided to recreational users of the forest estate.	Mention made of Land Reform Act and SOAC in Section 4 key theme 5.	Yes
<p>2.4 Forest Resource</p> <p>Expand and explain this section better to enable a better understanding of how the District functions. Including:</p> <ul style="list-style-type: none"> <li>• Use of forest products i.e. where does it go and what is it used for?</li> <li>• How much money does Cowal and Trossachs Forest District generate from timber sales?</li> <li>• Sustainability of the Forest District <ul style="list-style-type: none"> <li>○ how is the timber transported from the area and what facilities have been created/expanded to cope with the increase in harvesting</li> </ul> </li> </ul>	<p>Use of forest products – likely to change (possibly significantly) over period of plan therefore of questionable value.</p> <p>How much money generated from sale of timber – again, changes considerably year on year and could give a misleading picture.</p> <p>Sustainability – transport mentioned in section 4 key theme 2, with a broad</p>	Partially – see response

Consultation Comment	Response	Amendment made to the Plan?
<p>over the past few years e.g. Portavadie and Sandbank piers?</p> <ul style="list-style-type: none"> <li>○ how much wood is used or at least processed locally?</li> <li>○ How many local businesses does the industry support?</li> <li>○ Who are the District's customer base.?</li> <li>○ How are the forests managed e.g. % under continuous cover and reasoning behind this</li> </ul>	<p>description suitable for a strategic plan.</p> <p>How much wood is used or at least processed locally – broadly described in key theme 2 but difficult to provide figures due to method of selling (standing sales).</p> <p>How many local businesses does the industry support – difficult to specify in meaningful terms as support is given directly (contractors) and indirectly (accommodation, recreation etc).</p> <p>District's customer base – again, subject to regular change and not appropriate for this plan.</p> <p>Forest managed – Continuous Cover Forestry mentioned in key theme 6 and action point 6.05 to which the following has been added “Low impact systems will eventually be applied over approximately 10% of the forest area.”</p>	
<p>Reporting on Achievements – Cowal and Trossachs Forest District have achieved some excellent work over the past few years this should be expanded on in Section 3.</p>	<p>Table format is set, but will appear as an appendix. A new summary section will include this suggestion.</p>	<p>Yes</p>
<p>General Description of issues - The plan would read better if there was greater read across and between sections 4 and 5.</p>	<p>New section 4 created as part of template</p>	<p>Yes</p>
<p>Section 3 Reporting Achievements SFS Priority for Action 3 – reference to the ‘regional architect’ should read ‘Regional Archaeologist’.</p>	<p>Reference to regional architect and Regional Archaeologist deleted and correct terms used.</p>	<p>Yes</p>
<p>Table 2.3.4 does not note Helensburgh, Rothesay, Cardross, Shandon, Garelochhead, Kilcreggan or Rosneath as primary towns.</p>	<p>All additional primary towns now included.</p>	<p>Yes</p>
<p>National Parks and their aims should be given higher priority and profile.</p>	<p>The National Park and it's aims are referred to throughout the document at an appropriate level.</p>	<p>No – see response</p>
<p><b>Climate Change</b></p>		
<p>Some of the detail given in Section 4 appears to be more the ‘response’ rather than the ‘issue’, for example, increasing CCF as described on p.32.</p>	<p>Dealt with as part of the re-formatting of sections 4 &amp; 5.</p>	<p>Yes</p>
<p>Climate - DAMS information shown in spatial form would be a useful addition to this section, showing the influence of wind as a constraint throughout the district.</p>	<p>DAMS could be useful, but so could a number of other climatic influences (rainfall, temperature, snowfall etc.) all</p>	<p>No – see response</p>

Consultation Comment	Response	Amendment made to the Plan?
	of which would make the plan more unwieldy. Given the strategic nature of the plan, these datasets might not add much value – the description section gives a broad feel for the climate in the FD.	
The Argyll and Bute Modified Finalised Draft Local Plan contains a presumption against large scale windfarms in the Cowal and Trossachs area outwith the National Park.	Presumption against large scale windfarms in MDFLP now included.	Yes
<b>Timber</b>		
Increase Timber Supply Chain Efficiency: There is a lot of information in this section that could be termed as ‘achievements’ and could usefully be put in section 3.	Now appears in section 4 as “context”, and is appropriate to that new format.	Yes
<b>Business Development</b>		
Engagement with the planning authority is a key element in facilitating the provision of sites for affordable housing	The need to liaise with the council on affordable housing proposals added, to ensure compliance with development plan policy and Local Housing Strategy.	Yes
<b>Community Development</b>		
Partnerships: There are a number of partnership projects mentioned in section 4 that the District is involved in e.g. Argyll Forest Park Landscape Partnership project which no commitment is then made towards in section 5.	Only a few examples of partnerships are listed, reflecting some of the work we are doing. New partnerships will undoubtedly be created during the period of the Strategic Plan, for which similar support will be given.	No – see response
Partnerships - More specific actions could include commitment to a <u>tripartite</u> NP/FES/SNH agreement in terms of how we deal with Forest Tracks. The Great Trossachs Forest is probably the biggest single partnership project in the district and should therefore be mentioned in this context.	GFT mentioned at 4.18 and Forest Track Protocol at 6.13	Yes
<b>Access and Health</b>		
References to Sallochay car park are made which are certainly a priority, however the action should consider all management and development options for the car park site, and not assume that upgrade is the only action required.	Existing wording in old section 4 does not indicate that upgrade is the only action required. Wording in 5.02 changed from “upgrade” to “develop”.	Yes
References to forest walks in the monitoring should ideally relate to all types of outdoor access activity information as the forests offer a huge variety of opportunities not just walking.	Doesn’t now appear in re-formatted version.	No – see response
2.3.5 Recreation and Tourism - It is essential that Section 2.3.5 states what the current provision is in the District and provides spatial information about the location of the main facilities and routes including the key strategic routes that pass through the Forest District.	Again, a description is given in the SP which is sufficient strategically, but to show the facilities and routes would make a map difficult to read.	No – see response

<b>Consultation Comment</b>	<b>Response</b>	<b>Amendment made to the Plan?</b>
Recreation and tourism - The supporting table should include detail on the length of routes rather than the number, and should refer to shared use paths, all abilities paths, hill paths, specific activity paths e.g. cycle, horse etc.	Too much detail requested, although we will highlight the multi-purpose nature of trails.	Partially – see response
<b>Environmental Quality</b>		
The section on Environmental Quality does not pick up fully on many of the local strategies and information that could inform this section e.g. Landscape Character assessment , FE Nature Conservation Strategy, Special Qualities report, National Park Plan.	Local strategies, guidance, local policies will be listed as references should stakeholders wish more detail on any particular subject.	Yes
Contributing to Scotland’s Landscapes: Given the extensive programme of road building programmed for the District over the next decade or so, it would be appropriate to mention this here in relation to the promotion of good practice to mitigate landscape impacts of the development of forest roads and other infrastructure.	Sentence added to key theme 6 to include mitigation measures during road construction.	Yes
It would be appropriate to include a commitment/statement in this section to clarify in what circumstances archaeological survey/advice is sought from professionally qualified archaeologist.	Statement regarding reference to archaeologist now included.	Yes
Paragraphs 8-10 of this section would sit more easily under the following section ‘Manage the Historic Environment’.	Paragraphs now sit within overall heading of “Environmental Quality”.	No – see response
2.3.2 Landscape setting - Paragraph 3 of this section should also state that the National Park covers a large area of the District. The paragraph also suggests that there is only one example of a designed landscape within the district. There are of course many examples within the District but only one on the FE estate that is recorded within the inventory of Historic Gardens and Designed Landscapes.	National Park reference added, and designed landscape sentence amended.	Yes
Landscape Quality: A generic commitment to the long-term enhancement of the contribution that commercial woodlands make to the quality of the Park’s landscapes would be welcome here, with identification of priority areas for consideration	Sentence extended to now read “We will continue to include landscape as a major consideration in long-term forest planning, the objective being to ensure that multi-purpose forests play a positive role in the quality of the landscapes throughout the district.”	Yes
Cultural Heritage: It would be appropriate to include a generic commitment to safeguarding and enhancing historic landscapes, features and cultural associations of the FE estate.	This point is now not relevant in the re-formatted version.	No – see response
The District should have some level of commitment to promoting Gaelic language in publications, signs and interpretative panels.	Gaelic language policy yet to be ratified.	No – see response
Section 4 General Description of Issues: Environmental Quality the use of the word ‘artefact’ refers to an object but this is not the intention here.	Use of the word “artefact” removed and replaced with “historical site / feature”.	Yes

<b>Consultation Comment</b>	<b>Response</b>	<b>Amendment made to the Plan?</b>
Actions on landscape should be revised to take into account the Loch Lomond and Trossachs LCA	Key theme 6 acknowledges LL&TNP LCA – “During the planning process we will take into account any new information or recommendations from the soon to be published Loch Lomond and Trossachs Landscape Character Assessment.”	Yes
No reference to the Loch Lomond and Trossachs Woodland and Forestry Strategy Review	The LL&T Woodland & Forestry Framework is referenced in the document, however as the review has not yet taken place the current version will continue to be the relevant document.	No – see response
Section 4 Contributing to Scotland’s Landscapes should make reference to Landscape Character Assessments including the forthcoming LLTLCA.	Reference now made to the LLT LCA	Yes
Water quality – commitment should be made to responding to SEPA water quality monitoring.	Commitment at 6.01 to WFD and River basin management plans.	No – see response
Landscape - We suggest Forest Plans should be reviewed in light of information in the forthcoming LL&T LCA.	Forthcoming LLTNP LCA mentioned at key theme 6.	Yes
Section 2.3 Cultural Environment – figure given here for unscheduled ancient monuments is 366 but this is not reflected in the later section of the plan where it is given as 398.	Number of Unscheduled Monuments corrected as being 370.	Yes
<b>Biodiversity</b>		
The Strategy should refer to the National Park Biodiversity Action Plan.	NP Biodiversity Action Plan is already referred to under the collective description of “national and local biodiversity action plans”.	No – see response
Biodiversity - Section 2.2.5 only sets out biodiversity info in relation to designated sites. Some information on the distribution of BAP habitats and species, particularly those identified in the FD Nature Conservation Strategy should be included	Nature Conservation Strategy will be referred to, but we don’t want to reproduce bits of it in the SP. It will be more informative if people read the actual Nature Conservation Strategy	No – see response
Biodiversity - Much of the information in 2.2.5 could be shown spatially with the detailed tables included as an appendix and with more text summarising and describing the biodiversity issues within the district including identification of key sites and species.	Key sites and species are described, but not spatially. Again, it might be useful to do this, but the scale would be a significant constraint.	No – see response
Reverse Biodiversity Decline by Targeted Action: Paragraph 6 should also refer to sub-montane scrub as this is covered in the NPBAP (see comments on section 5 below)	Sub-montane scrub now mentioned in key theme 7 as a priority habitat.	Yes

<b>Consultation Comment</b>	<b>Response</b>	<b>Amendment made to the Plan?</b>
Paragraph 9 should also mention capercaillie in the list as Forest Design Plans in the District are already being adapted to accommodate the needs of this species.	Capercaillie now mentioned as a priority species in key theme 7.	Yes
Priority habitats: The first paragraph should make specific reference to the NPBAP work programmes for Forest and Woodland, Lochs Rivers and Ponds Plan and Moors and Mountains as these contain specific actions for the FD (The NPBAP Lochs Rivers and ponds plan mentions the Duchray Water corridor restructuring. The NPBAP Moors and Mountains plan proposes looking at the Forest Design Plans as they come up for review to look for scope for incorporating pockets of sub-montane scrub in suitable locations. The actions in the Forest & Woodland work programme are pretty well covered by existing actions in the Strategic plan)	Now addressed at 7.04.	Yes
Rhododendron: amend the proposed response to reflect the availability of the completed FCS/FR rhododendron survey for Argyll and the NPA survey of ponticum and knotweed. The FD rhododendron control programme will be able to make use of both these documents to inform the targeting of control work.	Rhododendron – now re-worded in 7.01 to include FCS/FR survey	Yes
The Plan needs targets about Forest Habitat Networks and BAP habitats outwith designated sites.	FHN and BAP targets outwith designated sites are not appropriate, as resources to deliver such targets are uncertain.	No – see response
Grazing control: again, targets need to be set in relation to upland habitats in relation to sheep and deer browsing	Grazing control – again, resource availability makes target setting inadvisable	No – see response
Priority species: In addition to water vole, the NPBAP has work programmes with Forest District actions for Black Grouse, Capercaillie and Red squirrel. As these actions are wider than forest design planning, these other species need to be mentioned as stand-alone projects in the Proposed Response column along with the water voles.	Table format has changed in re-formatted version, however capercaillie has been included in 7.04 as a SAP point.	Yes
Key Local Issues should also include a paragraph on Habitat networks. The NPA, FCS and SNH hope to produce an Integrated Habitat Network model to address other habitat types alongside woodland habitat networks. This could be referred to as a proposed response.	Habitat networks now mentioned at 7.09	Yes
This section should also refer to the Scottish Biodiversity Strategy and aim to deliver its aims wherever possible. The Loch Lomond & The Trossachs National Park Biodiversity Action Plan should also be referred to within this document where appropriate.	The NP BAP has been mentioned in key theme 7 context, and an additional sentence added to this section – “The Scottish Biodiversity Strategy is also a key document and the district will seek to deliver its aims wherever possible.”	Yes
In section 2.2.5 Biodiversity and Table 3 it is unclear whether the habitat and species action plans (HAPs & SAPs) referred to are the Forest District habitat and species action plans that have been completed or	HAPs and SAPs comment has been clarified in the re-formatted version, in key theme 7.	Yes

Consultation Comment	Response	Amendment made to the Plan?
are UK HAPs and SAPs		
We would like to see a reference made under habitat networks in section 5 on page 63, 'Proposed response (including implementation)', to make it clear that internal habitat networks would focus on priority habitats or would be beneficial to priority species, for example black grouse and capercaillie.	Habitat networks are addressed at 7.09 "Develop Forest Design Plans to enhance priority habitats and other internal habitats developing networks which would be beneficial to priority species such as Black grouse and capercaillie" which meets the suggestion made.	Yes
Loch Katrine Scheme, regeneration proposals must take into account other sensitivities and other objectives.	Archaeological survey undertaken as part of the Katrine EIA is mentioned as a management constraint. Cattle grazing similarly mentioned.	Yes
There are no explicit links, or references to the Cowal & Trossachs Forest District Conservation Strategy.	Reference to Conservation Strategy to be included as an appendix	Yes
The plan would benefit from clearer measurable targets and commitments. We would especially welcome clear targets in relation to the percentage of PAWS sites in the area that the district is committed to restoring.	Clearer measurable targets and commitments are constrained by the uncertainty of future resources; therefore the targets and commitments included are those which are thought achievable at the time of writing. PAWS target has been specified at 7.05 – "Survey all PAWS for threats, site type and condition and aim to convert at least 75% of these sites to native woodland".	Yes
Strategy should include actions that the District is committed to in the National Park LBAP	LL&TNP BAP is referred to in the re-formatted version, and has clarified the issue.	
Table 2 (SSSIs) to be updated	Updated	Yes
Section 4 – Reverse Biodiversity Decline by Targeted Action should be updated to include the SNH Species Action Framework, actions in the LLT LBAP and the recently published Invasive Non-native Species Strategy.	Reference made to these	Yes
Species choice – suggest 'Use of Forest ESC, <u>habitat network modelling</u> and relevant information on functional ecology of woodland species (e.g. squirrels) to determine species choice'	Text amended	Yes
Priority Habitats - This section should take into account the recent audit of Rhododendron and Knotweed carried out by Scottish Agricultural College on behalf of the LL&T NP	Rhododendron and knotweed mentioned in 7.01 PAWS commitment in 7.05	Yes
Priority Species – unclear which water vole project	Project clarified	Yes
Habitat Networks - should identify specific activities in the Great Trossachs Forest project and the commitment to generating habitat network maps for the National Park Area	Habitat Networks – addressed in 7.09 for general habitat networks. GTF mentioned in 7.04 as an example of future work.	Yes

<b>Consultation Comment</b>	<b>Response</b>	<b>Amendment made to the Plan?</b>
Deer management - Reference could be made to Joint Working arrangements between FCS, Deer Commission and SNH	Deer Management – new sentence added – “We will continue the joint working arrangements with SNH and the Deer Commission as an effective way of managing deer outwith FCS land.”	Yes

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

## **8. Reasons for choosing the CTFDSP, in the light of other reasonable alternatives**

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

- The ‘do-nothing’ option of continued implementation of the 2000 Forest District Strategic Plan. 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 plan demonstrated significant progress over the 2000 version and presented a more realistic and pragmatic solution than the local application of the Scottish Forestry Strategy. The CTFDSP 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 CTFDSP. 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.