

ePOST-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:

Galloway Forest District Strategic Plan 2009-2013

The Responsible Authority is:

The Forestry Commission Scotland (FCS)

PART 3


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Job Title Planning Manager

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Signature & date  24th May 2010

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1. BACKGROUND

Post-adoption SEA statement for:

Galloway 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	Galloway Forest District Strategic Plan (GFDSP) 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 Galloway 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)	The Galloway Forest District (across the local authority areas of Dumfries and Galloway, South Ayrshire, East Ayrshire and North Ayrshire).
Summary of nature/content of PPS	The GFDSP 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 Galloway 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 GALLOWAY 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 GF DSP 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 GF DSP 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 GF DSP to ensure a robust approach to the avoidance of negative environmental impacts.

TABLE 6.1

SEA issue	Existing problem?	Impact of GFDSP	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 GFDSP or reason for not having taken this into account
Biodiversity	Overall decline in biodiversity, sensitivity of international, national and locally important nature sites.	Non-timber sources of income could have a negative effect on biodiversity through disturbance of sensitive species or habitats. Current environmental protection policies only cover forest operations	Environmental protection policies should be strengthened to ensure all activities, operations and development on the Forest Estate are held to the same environmental standards as more traditional forestry practices	<i>The NFESP provides assurances that environmental issues will be taken into account in relation to renewable energy projects. Additional protection could be afforded by extending this approach to other forms of development or land use change on the Forest Estate.</i>	New text in relation to Renewable Energy which states that acceptable proposals will have 'due regard to community and environmental issues' (GAL 1.02). New policy under business development to state that support for renewables and mineral extraction will require appropriate regard for community and environmental issues (GAL 3.05).
Biodiversity	Overall decline in biodiversity, sensitivity of international, national and locally important nature sites.	Tourism and access policies may have limited negative impacts through increased visitor numbers	The tourism, access and environmental quality policies should be cross-referenced to ensure that any increase in visitor numbers is sustainably managed and has no adverse effects on biodiversity Environmental quality policies should be strengthened to ensure that all activities on the Forest Estate take biodiversity into account	<i>The NFESP includes a commitment to carry out research into the environmental impacts of recreation on the Forest Estate</i>	The NFESP covers this issue.

SEA issue	Existing problem?	Impact of GFDSP	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 GFDSP or reason for not having taken this into account
Water and soil	Damage to the water and/or soil environments	Species choice and timber supply policies may have detrimental effects through increased planting and ground works, resulting in limited erosion and runoff	Any large scale planting initiative will have some effect on the soil through the use of heavy machinery for ground preparation. However, adherence to the 'Forests and Soils' guidance and the adoption of lower impact techniques may limit damage and potential for runoff. A robust soil protection policy should be added to the FDSP to ensure equal protection for this fundamental resource	<i>The NFESP states a requirement to comply with Forestry Commission Soil and Water Guidelines however it is recommended that this approach should be extended to non-forestry activities promoted or facilitated by FES on the Forest Estate</i>	The NFESP covers this issue and careful adherence to the Forestry Commission forests and water guidelines effectively deals with the main issues of soil erosion and water quality in the District.
Water and soil	Damage to the water and/or soil environments	Access and health policies may have a negative impact as increased visitor numbers may contribute to erosion on and around the path and riding network	Access and health policies should be cross-referenced with environmental protection policies to ensure that access and leisure land uses remain sustainable and do not place unacceptable pressure on soils. A robust soil protection policy should be added to the FDSP which covers all activities, operations and developments on the Forest Estate	<i>NFESP includes a commitment to carry out research into the environmental impacts of recreation on the forest estate.</i>	The NFESP covers this issue.
Air	Increased emissions and diminishing air quality	Access, health and tourism policies may result in greater numbers of car-using visitors to the Forest Estate	These policies should be altered to ensure that public and non-motorised modes of transport are prioritised wherever possible and that recreation facilities are located as close to settlements as possible to reduce car use.	<i>NFESP includes a commitment to carry out research into the environmental impacts of recreation on the forest estate.</i>	The NFESP covers this issue.

SEA issue	Existing problem?	Impact of GFDSP	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 GFDSP or reason for not having taken this into account
Landscape	Potential damage to landscape quality	Timber supply policy will maintain a focus on commercial production, reducing the potential for landscape improvements	The implementation of Forest Design Plans will lead to improvements in the structure and appearance of woodlands. However, the policy should be altered to ensure that landscape quality is prioritised alongside quality timber production. The adoption of lower impact silvicultural systems will also improve the landscape contribution of commercial forests	<i>The NFESP environmental quality policies recognise the importance of landscape as an environmental asset and seek to protect landscape quality and designated areas.</i>	The NFESP covers this issue.
Landscape	Potential damage to landscape quality	Non-timber sources of income could also have detrimental effects on the landscape through visual intrusion (e.g. renewable energy infrastructure)	This policy should be revised to state that any diversification projects on the Forest Estate should conserve and enhance the environment Environmental quality policies should be extended to cover non-forest operations	<i>The NFESP provides assurance that environmental issues will be taken into account in relation to renewable energy projects</i> <i>This approach could be extended to other forms of land use change or development on the forest estate, particularly due to the emphasis on increasing income from non-forestry activities</i>	New text in relation to Renewable Energy which states that acceptable proposals will have 'due regard to community and environmental issues' (GAL 1.02). New policy under business development to state that support for renewables and mineral extraction will require appropriate regard for community and environmental issues (GAL 3.05).

SEA issue	Existing problem?	Impact of GFDSP	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 GFDSP or reason for not having taken this into account
Landscape	Potential damage to landscape quality	Portfolio analysis could result in land use change, with potential negative effects on the landscape	This policy should state that any land use change recommended by portfolio analysis should conform to wider FCS social and environmental standards. Similarly, no land should be disposed of for uses which will impinge on landscape quality	<i>The NFESP provides some clarification on land disposal and acquisition , for example by prioritising examples which will contribute to forest habitat networks, or meet WIAT objectives</i>	FES decides whether or not to sell land based on the public benefit which is scored around social and environmental considerations. This is the basis of many planning decisions and would also be addressed under the local authorities planning procedures. Methodology for disposal – FES will make it clearer how it intends to notify stakeholders of the intention to sell woodlands and criteria for making such a decision.
Historic Environment	Potential damage to the fabric or setting or cultural heritage sites	New woods and timber supply policies could result in damage to archaeological sites or their setting	Although compliance with the ‘Forests and Archaeology’ guidelines is assumed, any woodland expansion should be preceded by full, professional, archaeological survey to safeguard cultural heritage sites. The importance of historic landscapes and the setting of archaeological monuments should be given proper consideration in the forest design and planning processes	<i>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.</i>	The NFESP includes policies which address these concerns.

SEA issue	Existing problem?	Impact of GFDSP	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 GFDSP or reason for not having taken this into account
Historic Environment	Potential damage to the fabric or setting or cultural heritage sites	Non-timber sources of income and local business policies could result in development or projects with negative effects of cultural heritage	<p>Although any renewable energy development would be subject to planning consent, the non-timber income policy should be strengthened to ensure that any such development takes into account the setting of sites and the value of historic landscapes on the Forest Estate.</p> <p>Existing environmental protection policies should be extended to cover any use of the Forest Estate, in addition to the forest operations already covered</p> <p>The FDSP should state that any business explicitly supported by the Forest District should conform to wider FCS social and environmental standards so as to minimise impacts on the historic environment</p>	<p><i>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.</i></p>	These concerns are addressed by a comprehensive suite of policies in the NFESP.
Historic Environment	Potential damage to the fabric or setting or cultural heritage sites	Tourism and access policies could result in larger numbers of people visiting sites and monuments, with consequences for erosion, damage and safety	<p>These policies should be cross-referenced with the cultural heritage policy to ensure that access to and enjoyment of cultural heritage is promoted and managed sustainably</p> <p>The cultural heritage policy should also be extended to ensure that sites and monuments are protected from the full range of potential forest land uses</p>	<p><i>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.</i></p> <p><i>The plan also undertakes to study the effects of access and recreation on the environment.</i></p>	NFESP includes a comprehensive suite of policies which address these concerns.

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 GFDSP (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 Galloway 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.	The NFESP includes explicit protection for soils. The 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	The Galloway Forest District promotes Green Tourism through the Galloway Forest Park tourism and interpretive strategies and the district recreation plan.

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 GAL 3.05 to continue to work with minerals and renewables developments ‘where they show due regard for community and environmental issues’. In addition, FES policies on disposal of land are based on an analysis of public benefit, which is scored around social and environmental considerations – potential damage to the soil and water environment would therefore be taken into account in decision-making.
The Scottish Ministers (Historic Scotland)	No substantive comments	
Scottish Natural Heritage		
	Access, health and tourism policies should be amended to, where possible, prioritise non-motorised and public transport for visitors to the NFE, in order to mitigate potential negative effects on air quality and climate change objectives	The Galloway Forest District promotes Green Tourism through the Galloway Forest Park tourism and interpretive strategies and the district recreation plan. Key theme 5 Access and Health acknowledges the need to encourage access to forests by public transport, cycle and on foot.
SNH comments on National Forest Estate Strategic Plan and other FDSPs which are also relevant to Galloway Forest District		
Theme	Comment	Galloway FDSP Amendments
Climate change	Recognise the role of soils as carbon stores	The role of soils as carbon stores is comprehensively covered within the NFESP. The GF DSP includes the need for restoration of bogs and native woodland for the accumulation of carbon.
	Add a clearer statement to theme regarding working with natural processes in adapting to climate change (e.g. flood plain restoration)	New policy GAL 1.03 on flood management and catchment management planning.
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 policy GAL 3.05 to continue to work with minerals and renewables developments ‘where they show due regard for community and environmental issues’.
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 policy GAL 4.01 ‘promote social inclusion...recreation to appeal to families and the less able’.
	Need more active promotion of Core Paths, the SOAC and the wider access network, in conjunction with local authorities	Policy 5.03 commits to working with local authority-led access forums. Existing text outlines support for SOAC.

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
	Should include a commitment to safeguard paths where possible	No change of text however the FCS Recreation Framework states that ‘ we will maintain all our infrastructure to a baseline standard across the estate’.
Environmental Quality	Need to acknowledge the importance of soils as carbon sinks AND a potential source of Green House Gases.	This is comprehensively covered within the NFESP.
	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	Key theme 6 ‘Environmental Quality’ notes the importance of ancient woodland sites. The relevant policy relating to this is covered within the ‘Scotland’s woodlands and the historic environment’ publication.
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)	Mention is made of the introduction of the ‘moorland fringe’ concept to improve the conservation and landscape value of the forest edges.
	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	Policy 7.03 to ‘establish a further 3000ha of native woodland in the district (and aspire to establish a further 6000ha) by 2025.
	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 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	New text 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 GFDSP arising from wider consultation

The Consultative Draft Forest District Strategic for Galloway was subject to a period of consultation during which a number of comments were gained from a variety of organisations and individuals. The primary comments were in relation to the issues of acidification, timber transport and recreation opportunities, all of which were further addressed within the finalised versions of the National Forest Estate Strategic Plan and the Galloway Forest District Strategic Plan.

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

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

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

Together with the assessment of the GFDSP, 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 GFDSP 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 GFDSP. 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.