

**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:**

Inverness, Ross and Skye Forest District Strategic Plan 2009-2013

**The Responsible Authority is:**

The Forestry Commission Scotland (FCS)

**PART 3**


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

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## 1. BACKGROUND

### Post-adoption SEA statement for:

Inverness, Ross and Skye 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@forestrv.gsi.gov.uk](mailto:fcscotland@forestrv.gsi.gov.uk)

## 4. KEY FACTS

<b>Name of Responsible Authority</b>	Forestry Commission Scotland (FCS)
<b>Title of PPS</b>	Inverness, Ross and Skye Forest District Strategic Plan (IRSFDSP) 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 Inverness, Ross and Skye 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 Inverness, Ross and Skye Forest District (Highland Council area – Skye and Lochalsh, Inverness, Badenoch, Strathspey, Nairn and the Black Isle).
<b>Summary of nature/content of PPS</b>	The Inverness, Ross and Skye FD strategic plan 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 Inverness, Ross and Skye 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. Inverness, Ross and Skye Forest District was formed by the amalgamation of the former Inverness and Fort Augustus Forest Districts in 2009. 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 SEA process 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 INVERNESS, ROSS AND SKYE FOREST DISTRICT 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 (NFESP) and Forestry Commission guidelines and policies. The IRSFDSP 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 Inverness and Fort Augustus Strategic Plans 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 IRSFDSP 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 National Forest Estate Strategic Plan	Modification to the IRSFDSP, 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 climate change effects</p>	<p><b>Renewable energy and non-timber sources of income</b> policies may cause disturbance to species or damage habitats</p>	<p>Although renewable energy developments will be subject to planning consent, existing environmental protection policies should be strengthened to cover non-forest uses of FE land.</p> <p>Diversification policies should explicitly state that any non-timber development schemes will comply with wider FCS social and environmental policies and have no net negative impact on biodiversity</p> <p>Woodfuel schemes should ensure that, wherever possible, road transport of feedstock is minimised so as to maximise climate change mitigation potential</p>	<p><i>The NFESP provides assurance that environmental issues will be taken into account in relation to renewable energy developments however it would be beneficial to extend this approach to include other non-forestry related activities which may take place on the Forest Estate</i></p>	<p>Renewable energy policy IRS 1.01 reworded to state that proposals which would have adverse impacts on designated areas, communities, landscape and other environmental concerns will be ‘sifted out’ by FES.</p>
Biodiversity	<p>Overall decline in biodiversity, sensitivity of international, national and locally important nature sites.</p>	<p><b>Support for local businesses and portfolio analysis</b> could create negative impacts, depending on the outcomes of analyses and the nature of businesses supported</p>	<p>The FDSP should state that any business or enterprise explicitly supported by the Forest District should be broadly compatible with FCS social and environmental aims</p> <p>The portfolio analysis policy should be amended to ensure that any change of land use recommended as a result of analysis has no negative impact on biodiversity and is in keeping with the aims and objectives of FCS</p>		<p>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.</p> <p>FES will make clearer how it intends to notify stakeholders of the intention to sell woodlands and the criteria for making such a decision.</p>

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Biodiversity	Overall decline in biodiversity, sensitivity of international, national and locally important nature sites.	<b>Community ownership and management</b> policy could result in changes of land use (e.g. allocation for affordable housing) which may adversely affect biodiversity	<p>Any disposal of Forest Estate land through the National Forest Land Scheme should state that the proposed use must be in keeping with wider FCS social and environmental aims, and have no net negative impact on biodiversity</p> <p>Existing environmental quality policies should also be extended to cover non-forestry uses of Forest Estate land</p>		<p>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.</p> <p>Policy IRS 4.06 strengthened to ensure that applications through the NFLS to establish affordable housing do not ‘impact significantly on other objectives of management of the forest.’</p>
Biodiversity	<p>Overall decline in biodiversity, sensitivity of international, national and locally important nature sites.</p> <p>Potential climate change effects</p>	<b>Access and core paths</b> policies could result in higher levels of disturbance should visitor numbers increase. May also increase private car use in accessing woods and forests	<p>Access and environmental quality policies should be cross-referenced to ensure that public use of the forest resource is promoted and managed in a sustainable fashion.</p> <p>Environmental quality policies should be extended to cover all potential uses of forest land, including access, leisure and recreation to minimise disturbance will allowing the maximum number of people to enjoy and appreciate environments rich in biodiversity</p>	<i>NFESP includes a commitment to undertake research into the environmental impacts of recreation on the forest estate</i>	<p>Policies, such as IRS 5.03, (regarding mountain biking) strengthened to state that facilities will ‘meet appropriate safety and environmental standards.’</p> <p>Policy IRS 5.06 prioritises promotion of public transport links to the forest estate</p>

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Population and human health	Possible adverse effects on quality of life and economic potential of the landscape	<b>Renewable energy</b> policies could limit public access to forest land or impact on landscape quality, with knock-on effects for tourism	<p>Although additional environmental protection will be conveyed through the planning system (and perhaps EIA) in the case of large renewables developments, policies should be amended to ensure that any such initiative of the Forest Estate complies with wider FCS social and environmental aims. This should focus on maintaining access and preventing negative effects on tourist revenues</p> <p>Planting for biomass crops (e.g. willow coppice) should only occur where landscape values will not be affected. Similarly, the impacts of fuelwood haulage should also be mitigated and, where possible, moved to more sustainable modes of transport</p>	<i>The NFESP provides assurance that environmental issues will be taken into account in relation to renewable energy projects. It would be beneficial to reflect this approach in the FDSP and extend this approach to other forms of development or land use change on the Forest Estate</i>	Policy IRS 1.01 states that renewable energy proposals with adverse effects on community, landscape and environmental concerns will be 'screened out'
Population and human health	Possible adverse effects on quality of life and economic potential of the landscape	<b>Portfolio analysis</b> may result in changes of land use that limit access or impair scenic values	This policy should be strengthened to ensure that any development or disposal of land as an outcome of portfolio analysis does not have a negative impact on communities and is in keeping with wider FCS social and environmental aims	<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.

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 National Forest Estate Strategic Plan	Modification to the IRSFDSP, or reason for not having taken this into account
Water and soil	Damage to the water and soil environments	<b>Renewable energy and non-timber sources of income</b> policies could result in detrimental effects on soils and increased runoff through heavy engineering works and other operations	<p>A robust soil protection policy should be added to the FDSP to safeguard this most basic resource</p> <p>Renewables projects will be subject to planning approval and will impose environmental protection criteria. However, the Forest District should ensure that any operations – whether engineering or biomass planting – conform to best practice in soil handling and limit the potential for runoff and erosion (with resultant effects on watercourses)</p> <p>The existing water policy should be extended to cover all non-forestry uses of FE land</p>	<p><i>The NFESP provides assurance that environmental issues will be taken into account in relation to renewable energy projects.</i></p> <p><i>Furthermore, the FSP states a requirement to comply with Forestry Commission Soil and Water Guidelines</i></p>	<p>Policy IRS 1.01 revised to ‘sift out’ proposals with potentially adverse environmental effects.</p> <p>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</p>
Water and soil	Damage to the water and soil environments	<b>New woodland and timber supply</b> policies will have inevitable negative effects on the soil environment	<p>Any large-scale planting schemes requiring the use of heavy machinery for ground preparation and planting will have localised impacts on soils. Although adherence to the ‘Forests and Soils’ guidelines is assumed, a robust soils protection policy should be added to the FDSP to extend the protection of this most fundamental resource.</p> <p>Adopting LISS/continuous cover should also mitigate further damage once forests are established</p>	<p><i>The NFESP states a requirement to comply with Forestry Commission Soil and Water Guidelines,</i></p>	<p>Policy IRS 6.01 undertakes to reduce the risks of sedimentation and acidification, while policies 6.02-0.4 strengthen site planning and consultation to ensure risks are appropriately mitigated and that chemical use is reduced</p>
Air	Increasing vehicular emissions, resulting in falling air quality	<b>Renewable energy</b> (woodfuel) and <b>timber supply</b> policies may result in increased use of road haulage for timber, forest products and fuelwood	<p>Policies should, where possible, prioritise more sustainable modes of transport and should ensure that emissions benefits of biomass generation are not undermined by an over-reliance on road transport</p>	<p><i>The NFESP contains a number of policies relating to the sustainable transport of timber which should help to minimise emissions</i></p>	<p>Policy IRS 2.07 states that FEW will investigate sea and canal-based transport options to reduce emissions</p>

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Landscape	Detrimental impacts on landscape quality through visual intrusion	<b>Renewable energy, community ownership</b> and business development initiatives could potentially affect landscape quality through inappropriate design or location of facilities	<p>The visual impact of renewables schemes will be considered through the planning process, but the FDSP should also ensure that no development of this nature will be considered on the Forest Estate where negative landscape impacts may ensue.</p> <p>Community development and business development initiatives on the Forest Estate should only be considered where they conform to wider FCS social and environmental standards, thus limiting their landscape impact</p>	<i>The NFESP provides assurance that environmental issues will be taken into account in relation to renewable energy projects. It would be beneficial to reflect this approach in the FDSP and extend this approach to other forms of development or land use change on the Forest Estate</i>	<p>Policy IRS 1.01 undertakes to screen out inappropriate proposals for wind energy development on the NFE.</p> <p>Decisions on land disposal through the NFLS are made based on the public interest – within which potential environmental impacts are an important consideration</p>
Historic environment	Degradation/loss of the fabric and setting of cultural heritage sites	<b>Renewable energy</b> developments may have negative impacts on the setting of ancient monuments	<p>The cultural heritage policy should be strengthened to safeguard not only physical monuments, but also their setting and role in the historic landscape.</p> <p>As renewables development is subject to the planning process, and often EIA, it is likely that the FCS role will be limited to steering proposals away from areas with known cultural heritage value</p> <p>Planting for biomass generation should comply with the ‘Forests and Archaeology’ guidelines. However, the cultural heritage policy should impress the importance of full, professional, archaeological survey in the planning and design phase of any planting initiative</p>	<i>The NFESP includes a suite of policies which address these concerns</i>	<i>No explicit references to cultural heritage in renewables policy. However, cultural heritage and the historic environment are implicitly covered by the undertaking of policy IRS 1.01 to ensure that wind energy proposals with adverse environmental effects are not encouraged on the NFE.</i>
Historic environment	Degradation/loss of the fabric and setting of cultural heritage sites	<b>Flood and catchment management and new woodland</b> policies may impact on cultural heritage by extending planting into areas rich in archaeological remains	Any large scale planting initiative is likely to create conflict with the preservation of archaeological sites. Although forest operations are expected to comply with the ‘Forests and Archaeology’ guidelines,	<i>These concerns are addressed by a comprehensive suite of policies in the NFESP</i>	Policy IRS 6.08 undertakes to protect the monuments in the care of FES and to ensure that associated issues are adequately addressed in relation to proposed developments.

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Historic environment	Degradation/loss of the fabric and setting of cultural heritage sites	<b>Tourism and access</b> policies may result in greater pressure on cultural heritage sites through increased visitor numbers	<p>These policies should be cross-referenced with the cultural heritage policy to ensure that access and enjoyment of archaeological sites is sustainably promoted and managed.</p> <p>The cultural heritage policy should make a greater commitment to the protection and management of unscheduled sites to promote interpretation and their survival.</p> <p>The policy should also be strengthened to ensure that cultural heritage is protected in the course of any potential use of the Forest Estate</p>	<p><i>These concerns are addressed by a comprehensive suite of policies in the NFES, and includes a commitment to undertake research into the environmental impacts of recreation on the forest estate</i></p>	<p>Policy IRS 6.08 undertakes to protect the monuments in the care of FES and to ensure that associated issues are adequately addressed in relation to proposed developments. Although access and tourist infrastructure is not explicitly mentioned, it is assumed that such proposals would be subject to the same level of scrutiny as other uses of the NFE.</p>

## 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 Inverness and Fort Augustus FDSPs (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	Separate policy included regarding Water Framework Directive obligations.  In addition the IRSFDSP 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.
	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 stipulates compliance with the Water Framework Directive, and is not limited in scope to forest operations  NFESP Post Consultation Comments and Changes: 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.  <i>Note also that the Soils guidelines are being revised to develop a more updated series.</i>
<b>The Scottish Ministers (Historic Scotland)</b>	<b>No substantive comments</b>	

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 Natural Heritage</b>		
SNH Comments on <b>Inverness and Fort Augustus</b> Forest District Strategic Plans	<p>Section 5's Monitoring and Aspiration – Regarding the Water Framework Directive: we are aware that there are a number of actions for FES in the North Highland AAG area. These should be referred to in the plan.</p> <p>Priority Species: intermediate wintergreen (Species Action Framework) and small cow wheat (UK BAP priority species and Species Action Framework species) should be added to this list and the table presented in Appendix 6.</p> <p>Comments regarding errors of omission and naming of designated sites in Appendix 7.</p>	<p>The adopted FDSP has been significantly edited to provide a higher-level strategic focus. Similarly, the amalgamation of the Inverness and Fort Augustus FD plans also requires a reduction in overall detail.</p> <p>The inclusion of site-specific actions is therefore inappropriate, as these will be dealt with through lower-tier plans and strategies. Instead, Policy IRS 6.02 commits FES to working with SNH and SEPA to deliver the requirements of the Water Framework Directive</p> <p>The strategic refocusing of the FDSP through the editing process has removed the Appendix in question. However, Policy IRS 7.01 undertakes to ensure that future forest structure will protect and enhance species action plan priority species. Similarly, Policy IRS 7.02 ensures that working practices are modified to take account of protected species, and Policy 7.05 commits FES to surveying all habitats in the district to guide the forest planning and design processes.</p> <p>As above, site-specific references have been edited out of the adopted FDSP. Instead, the policy framework undertakes to protect all designated sites (7.11) and to enhance the condition of designated sites on the Forest Estate (7.10, 7.12)</p>
	The text indicates that district has no acid-sensitive catchments and gives a definition for these as “water catchment where the soils are underlain by acidic bedrock.” yet acidic rocks are, as highlighted, present within the District.	This is no longer specifically covered in the revised plan. However, safeguarding water quality and soil nutrients and integrity are prioritised. Policy IRS 6.01 undertakes to reduce the risk of sedimentation and acidification as a result of forest operations and IRS 6.02 commits FES to continued cooperation with SEPA and SNH in delivering commitments under the Water Framework Directive. Improved site planning and consultation to reduce downstream impacts are prioritised by policy IRS 6.03
	We [SNH] were surprised to read that “Scots pine does not occur naturally in the District...”	Plan corrected

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
	<p>Whilst we [SNH] support nature-based tourism initiatives these must not be at the expense of wildlife. In the tourism section we would wish to see acknowledgment of the need to strike the correct balance. We do not doubt that FES recognises the issue and this would be an appropriate point to make reference to it</p>	<p>Plan amended: specific reference included 'balancing public access with potential impact on natural and cultural heritage, such as disturbance to priority species.'</p> <p>The NFESP also includes a commitment to commission research into the environmental impacts of access and recreation of the NFE.</p>
	<p>Renewable energy: We [SNH] believe all proposals should be considered on their merits. There is no detail as to what constitutes "appropriate".</p>	<p><i>All applications for planning permission must be considered on their own merits in accordance with Scottish Planning Policy and the development management regulations.</i></p> <p>Policy IRS 1.01 undertakes to screen out proposals with adverse impacts on designated area, community, landscape, planning and other environmental concerns</p>
	<p>The section on "Species choice" looks to increase tree species diversity but does not specify whether or not this includes native tree species.</p>	<p>Policy IRS 2.03 states that 'distribution of species and selection of correct origins will follow sound silvicultural practice to take advantage of our favourable climatic conditions.' This implies that non-native species will remain an important part of the species mix for productive woodlands. However, Policy 2.08 undertakes to increase the proportion of native broadleaved woodland in the District from 8.8% to 20% by 2050 – a significant increase in native cover – and to identify opportunities for native planting in re-stocking operations or where new land is acquired for woodland expansion.</p>
	<p>Under water quality, reference is made to the Water Framework Directive but there is scope here for a stronger link to compliance with the Water Environment and Water Services (Scotland) Act 2003 and FCS's involvement with the development of River Basin Management plans through SEPA's Area Advisory Groups and the National Advisory Group.</p>	<p><i>The NFESP contains specific FES-wide commitments to the WFD, the Water Environment and Water Services (Scotland) Act 2003 and the River Basin Management Planning process that will be implemented through all FES activities.</i></p> <p>Policy IRS 6.02 commits the District to continuing liaison with SEPA and SNH to deliver WFD obligations (including those implemented through the 2003 Act)</p>

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	<p>Designated sites: Favourable conservation status is a specific term which comes from the Habitats Directive i.e. it relates to SACs only. However, since SPAs and SACs together form the network of Natura sites, the interpretation of relevant parts of the Birds Directive may usefully be informed by the more detailed definitions of <i>FCS</i> in the Habitats Directive. SPAs are designated for birds only so greater accuracy is needed with the terminology. It is not the sites <i>per se</i> that will be in favourable condition but the features of the site. Clearly, if all the features are favourable then the site itself could be classed as such, but again the terminology is not being applied in a strictly correct manner. It may not always be appropriate to expand the native woodland area so in its current form the statement "...the native woodland area is expanded..." is too generic.</p>	<p>Correct terminology applied to Policy IRS 7.10 – refers to status of ‘features’ and therefore applied equally to sites designated under the Habitats (SAC) and Birds (SPA) Directives (in addition to SSSIs).</p>
	<p>The marine environment section is out of date. However, SNH supports the aspiration</p>	<p>Reference to potential future marine national parks remains, although updated with potential for European designation for bottlenose dolphin</p>
	<p>Page 51 – Regarding the first aspiration, there appears to be no consideration given to the issue of favouring one habitat over another, which could have a bearing on the scope for woodland expansion in some areas. The aspirational figure of 15% – 20% native woodland cover in the District is actually less than the 25% native woodland cover apparently already in the District (c.f. page 52 Native woodlands section).</p>	<p>Supporting text for the policy framework states that expansion of native woodlands/restoration of PAW sites will be a high priority, unless there are ‘compelling reasons not to e.g. retaining Norway spruce for red squirrels.’ The plan also undertakes to identify and protect priority open habitats/networks with a view to creating optimum forest/open habitat mosaics.</p>
	<p>Under monitoring programme the comment could be amended by the addition of ‘ of SSSI, SAC and SPA features ‘ after “Site condition monitoring...” to identify that SNH’s monitoring input relates only to designated sites.</p>	<p>Specific reference removed.</p>

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>SNH comments on National Forest Estate Strategic Plan which are also relevant to Inverness, Ross and Skye Forest District</b>	Climate Change: Recognise the role of soils as carbon stores / Further consideration should be given to the potential of development or afforestation affecting peatlands to release stored carbon	<b>FDSP Changes</b> No specific change; Policies prioritise low impact silviculture where possible, potentially reducing carbon release from soils.
	Add a clearer statement to theme regarding working with natural processes in adapting to climate change (e.g. flood plain restoration)	New text on flooding and catchment management and role of forestry in sustainable flood management.

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
	<p>Community Development: The scope of the policy area should be more explicitly defined to help assess effects (particularly on natural heritage)</p>	<p><b>Response to comment which states that there is only limited commitment to community development within the FDSP (expands on the community development theme):</b></p> <p>The Scottish Forestry Strategy's Community Development theme outlines the continued commitment to involving communities in the management and ownership of forests in Scotland. This is reflected in the 100 or more community partnerships currently active on the national forest estate. These partnerships were evaluated in 2006 with the study finding that there was a 70% satisfaction rating with how they were operating.</p> <p>A more recent study into the value of community woodland projects and their role in developing community capacity building identified 138 active community woodland groups in Scotland managing approximately 2% of the forest area with around 13,000 active participants. This clearly demonstrates a sector that is continuing to grow and demonstrate the opportunities for locally driven rural development.</p> <p>The option of acquiring land for the purpose of establishing woodland crofts was added to the <u>National Forest Land Scheme (NFLS)</u> in May 2008. Further information and on the different aspects of creating <u>woodland crofts</u> is available on the FCS website. In addition, a Woodland Crofts Project Officer has been employed, in partnership with the Community Land Unit, to work with interested community organisations to develop their ideas and proposals.</p> <p><b>Within the FDSP</b></p> <p>Significant expansion of explicit policy coverage in relation to Community Development theme – although no specific reference to potential impacts on natural heritage.</p> <p>It should be noted that any development proposals on the National Forest Estate would require planning permission and would, as such, be required to take potential environmental effects into consideration (including through EIA where necessary). Similarly, decisions to dispose of land through the NFLS are taken on a public interest basis – with potential environmental impacts being an important component.</p>

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
	Access and Health: Should include a commitment to safeguard paths where possible	National strategic plan commits to protecting public rights of way in forest design and management planning
	Environment Quality: Plan should refer to the role of forestry in acid deposition	Policy 6.02 undertakes to minimise the risks of acidification during forest operations
	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	Recently published FCS Policy ' <i>Scotland's Woodlands and the Historic Environment</i> ' provides comprehensive coverage of built and natural elements of the historic environment  Policy IRS 6.09 contains a specific reference to 'living heritage' in the context of the historic environment

### Changes to the Inverness, Ross and Skye Forest District Strategic Plan arising from wider consultation

The Consultative Draft Forest District Strategic Plans for Inverness and Fort Augustus were subject to a period of consultation from which a number of comments were gained from a variety of organisations and individuals. Strategic issues included the potential of some activities to deliver against more than one objective, the need to link up with other policies from partner organisations and the consideration of 'signature projects' to deliver national priorities. As with other FDSPs the need to consider the context in terms of the private sector and the overall Scottish resource was highlighted.

The topic of climate change raised a number of concerns particularly in relation to new planting on floodplains and the biodiversity implications of short rotation coppice, wood fuel and windfarm development. The topic of biodiversity prompted a number of comments including positive support for the objectives of the biodiversity theme from SNH. The RSPB set out the importance of specific forest planning in relation to a number of bird species. The primary importance of timber production above other objectives was also set out by some respondents illustrating the diversity of comments gained.

A summary of responses has been prepared and is available on the Forestry Commission website [www.forestry.gov.uk/fesplans](http://www.forestry.gov.uk/fesplans)

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

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

Together with the assessment of the Inverness, Ross and Skye Forest District Strategic Plan, nine alternative scenarios were developed and evaluated. These were:

- The ‘do-nothing’ option of continued implementation of the 2000 Forest District Strategic Plans (for Inverness and Fort Augustus Districts). 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 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 IRSFDSP 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.

## **10. Conclusion**

We believe that the SEA process has assisted in developing a balanced Inverness, Ross and Skye Forest District Strategic Plan. 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.