

**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:**

Lochaber 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:

Lochaber 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>	Lochaber Forest District Strategic Plan (LFDSP) 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 Lochaber 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 Lochaber Forest District (Highland Council area, from the Morvern peninsula to Glen Garry)
<b>Summary of nature/content of PPS</b>	The Lochaber 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 Lochaber 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 LOCHABER 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 and Forestry Commission guidelines and policies. The LFDSP 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 Lochaber Forest District Strategic Plan 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 LFDSP 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 LFDSP, or reason for not having taken this into account
<b>Biodiversity</b>	Overall decline in biodiversity, sensitivity of international, national and locally important nature sites.	<b>Renewable energy and alternative sources of income</b> policies may have negative impacts on biodiversity by causing disturbance to sensitive habitats or species	<p>Although renewable energy developments will require planning consent and will therefore be required to comply with national environmental standards, the FDSP should require any developments of this nature – including planting for woodfuel – to have no negative effects on biodiversity.</p> <p>Environmental protection policies should be extended to ensure that any potential use of the Forest Estate, not just forest operations, comply with wider FCS environmental standards</p>	<i>The National FESP provides assurance that environmental issues will be taken into account in relation to renewable energy projects.</i>	<i>Renewable energy policy 1.01 reworded to state that FES will ‘sift out’ proposals that would have adverse impacts on designated areas</i>
<b>Biodiversity</b>	Overall decline in biodiversity, sensitivity of international, national and locally important nature sites.	<b>Support for local businesses</b> and disposal of forest land as a result of <b>portfolio analysis</b> policies could negatively affect biodiversity depending on the nature of the enterprises in question	The plan should state that any business explicitly supported by the Forest District should comply with wider FCS social and environmental standards		<p><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.</i></p> <p><i>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.</i></p>

SEA issue	Existing problem?	Impact of Forest District Strategic Plan	Proposed measures for the reduction/prevention and offset of significant adverse effects	Implications of policies contained in FES National Forest Estate Strategic Plan	Modification to the LFDSP, or reason for not having taken this into account
Biodiversity	Overall decline in biodiversity, sensitivity of international, national and locally important nature sites.	The higher visitor numbers generated by the <b>access and health</b> policies may increase the potential for disturbance of species and habitat	These policies should be cross-referenced with the environmental protection policies to ensure that access and recreation are sustainably promoted and managed to ensure that, while people are able to enjoy biodiverse environments, no lasting damage is done thus helping to strengthen the plan.	<i>The NFESP includes a commitment to carry out research into the environmental impacts of recreation on the forest estate</i>	<i>Issue covered in the NFESP</i>
Population and human health		<b>Renewable energy</b> developments could potentially affect quality of life through limiting access, visual intrusion or damage to tourist revenues	The policy should be reinforced to ensure that no loss of amenity will occur through any renewables initiative on the Forest Estate.  Impacts on local communities would be considered during the planning procedure of any renewables development, and may also be subject to EIA.	<i>The NFESP provides assurance that social issues will be taken into account in relation to renewable energy projects.</i>	<i>Issue covered in the NFESP</i>  <i>This would also be considered through the planning and EIA processes</i>
Water and soil	Damage to the water and soil environments	<b>Renewable energy</b> projects could cause severe localised damage to soils as a result of engineering work, with knock-on implications for erosion and runoff	Again, these impacts are likely to be mitigated through the planning process.  A robust soil protection policy should be added to the FDSP to ensure that any activity or operation on FE land conforms to best practice guidelines in soil handling and limits the potential for runoff and pollution of watercourses.  Existing environmental protection policies should be extended to cover any potential use of the Forest Estate, in addition to more traditional forestry operations.	<i>The NFESP provides assurance that environmental issues will be taken into account in relation to renewable energy projects.</i>  <i>Also requires compliance with Forestry Commission Soil and Water Guidelines.</i>	<i>Impacts of renewable energy development will be assessed and mitigated through the planning and EIA processes</i>  <i>Policy 6.01 requires compliance with the Water Framework Directive (no change, but now stand-alone policy)</i>

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 LFDSP, or reason for not having taken this into account
Water and soil	Damage to the water and soil environments	New planting for <b>carbon sequestration</b> and improving <b>timber supply</b> will have an inevitable effect on soils	<p>Ground preparation and planting operations should comply with the 'Forests and Soils' guidelines.</p> <p>A robust soil protection policy should be added to the FDSP to enhance the protection of this most fundamental resource.</p>	<i>The NFESP states a requirement to comply with Forestry Commission Soil and Water Guidelines.</i>	<p><i>Policy 6.01 requires compliance with the Water Framework Directive</i></p> <p><i>Policy 6.02 requires the minimisation of sedimentation/acidification during forest operations</i></p> <p><i>(no change, but now stand-alone policies)</i></p>
Water and soil	Damage to the water and soil environments	<b>Alternative sources of income and access</b> policies could result in damage to soils through more intensive use of the forest, especially in relation to recreation or the acquisition of agricultural land for woodland expansion	<p>A robust soil protection policy should be added to the FDSP to enhance the protection of this most fundamental resource.</p> <p>Existing environmental protection policies should be extended to cover any potential use of the Forest Estate.</p> <p>The plan should ensure that any diversification initiatives comply with wider FCS social and environmental standards.</p>	<i>The NFESP states a requirement to comply with Forestry Commission Soil and Water Guidelines.</i>	<p><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.</i></p> <p><i>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.</i></p>
Air	Increased emissions from larger numbers of vehicle movements	<b>Timber supply, tourism and access policies</b> could result in diminished air quality through increased reliance on road transport	<p>Effective cross-referencing with the timber transport policy should ensure that more sustainable solutions for haulage are explored.</p> <p>Access and tourism policies should prioritise public and non-motorised transport wherever possible.</p> <p>Expansion of the leisure and recreation infrastructure should be concentrated around settlements to limit private car use in accessing facilities.</p>	<i>The NFESP provides assurance that sustainable forms of timber transport will be used where possible and as such, associated emissions should be reduced.</i>	<p><i>Policy 2.07 prioritises movement of timber by sea where possible</i></p> <p><i>Policy 5.05 will improve access to forests by public transport</i></p>

SEA issue	Existing problem?	Impact of Forest District Strategic Plan	Proposed measures for the reduction/prevention and offset of significant adverse effects	Implications of policies contained in FES National Forest Estate Strategic Plan	Modification to the LFDSP, or reason for not having taken this into account
Landscape	Potential damage to landscape quality	<b>Renewable energy</b> policy could result in developments which negatively affect landscape values	<p>This policy should be strengthened to ensure that any renewables venture on the Forest Estate (whether infrastructure or planting for woodfuel) has no negative effect on landscape quality.</p> <p>The landscape quality policy should be extended to ensure that any potential use of the Forest Estate is covered in its provisions.</p> <p>Any renewables development will be subject to planning consent, which will take landscape value into account.</p>	<i>The NFESP raises the profile of sites designated for their landscape value and includes several environmental quality policies dedicated their protection</i>	<i>Landscape impacts will be effectively assessed and mitigated through the planning and EIA processes</i>
Landscape	Potential damage to landscape quality	<b>Alternative sources of income</b>	<p>The FDSP should state that any economic development proposal for Forest Estate land will have no detrimental landscape impacts and must be in keeping with wider FCS social and environmental standards.</p> <p>Existing environmental quality policies should be extended to cover any and all potential uses of Forest Estate land.</p>	<i>Whilst the NFESP provides assurance that environmental issues will be taken into account in relation to renewable energy projects</i>	<i>Where development proposals require planning permission, any landscape impacts will be dealt with and mitigated through the planning (and if necessary EIA) process</i>
Historic environment	Detrimental effects on or damage to the fabric or setting of cultural heritage sites	<b>Renewable energy and alternative sources of income</b> may have negative effects on archaeological sites and monuments through physical damage or visual intrusion	<p>The historic environment policy should be extended to ensure that any potential use of Forest Estate land complies with wider FCS environmental standards.</p> <p>The plan should state that any diversification or renewable energy scheme should have no negative effects on sites, monuments or historic landscapes. This is particularly relevant in the case of leisure and recreation infrastructure, as renewable development comes within the scope of the planning system.</p>	<i>A number of policies in the NFESP address these issues.</i>	<p><i>Potential impacts on the historic environment would be considered through the planning and EIA processes.</i></p> <p><i>Renewable energy policy 1.01 reworded to state that FES will 'sift out' proposals that would have adverse impacts on designated areas</i></p>

SEA issue	Existing problem?	Impact of Forest District Strategic Plan	Proposed measures for the reduction/prevention and offset of significant adverse effects	Implications of policies contained in FES National Forest Estate Strategic Plan	Modification to the LFDSP, or reason for not having taken this into account
Historic environment	Detrimental effects on or damage to the fabric or setting of cultural heritage sites	The expansion of woods and forests for <b>carbon sequestration, timber supply</b> or <b>habitat networks</b> will present inevitable conflict with cultural heritage sites	All forest operations should comply with the 'Forests and Archaeology' guidelines.  The historic environment policy should be extended to insist on full, professional, archaeological survey during the planning stages of any proposed forest expansion and cultural heritage sites and their setting in the historic landscape should be respected in forest designs.  Cross-reference with other policy areas should ensure that no conflicts arise.	<i>The NFESP includes a suite of policies which address these concerns</i>	<i>Impacts on cultural heritage will be considered as part of the forestry EIA process conducted in advance of afforestation</i>
Historic environment	Detrimental effects on or damage to the fabric or setting of cultural heritage sites	The increase in visitor numbers precipitated by <b>access</b> policies may have detrimental effects on archaeological sites and monuments	The historic environment policy should be cross-referenced with the access policies to ensure that public access to and appreciation of archaeological sites should be sustainably managed.  It should also be extended to cover any potential use of the Forest Estate in addition to more traditional forest operations.  The FDSP should also require full, professional, archaeological survey in advance of any leisure or recreation development on the Forest Estate.	<i>The NFESP includes a suite of policies which address these concerns. Furthermore, it includes a commitment to carry out research into the environmental impacts of recreation on the Forest Estate.</i>	
Material assets	Increased fuel use through more private car trips to woods and forests	<b>By enabling more people to enjoy woods</b> , the plan risks creating traffic, with resultant increases in emissions	Access and tourism policies should promote sustainable, public and non-motorised transport wherever possible.  Woods close to settlements should be prioritised for the creation of leisure and recreation infrastructure to limit private car use.	<i>The NFESP states that walking and cycling will be promoted in the Forest Estate and commits to delivering the benefits of woodland access closer to where people live and work through the delivery of WIAT.</i>	<i>Policy 5.05 prioritises improvement of public transport links to the forest estate</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 LFDSP (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	LFDSP Amendments: Separate policy included regarding Water Framework Directive obligations
	Inclusion of a soil protection policy is vital (as per ER recommendations), as stipulating adherence to Soils and Water guidelines is insufficient mitigation.	LFDSP Amendments: Policy 6.01 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>	
<b>Scottish Natural Heritage</b>		
ER comment: CLIMATE CHANGE THEME	Contradiction between the assessment for air and CC objectives in relation to vehicle emissions (from increased tourist numbers visiting NFE) CC assessment shows no impact, while air records negative effects	Assessment updated; Policy 5.05 seeks to improve access to woodland via public transport and reduce overall emissions from transport

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
FDSP comment:	Biodiversity information should be revised (further comments sent to FES)	Information updated (and scaled back) in FDSP
General comment on ER:	ER 'FDSP 2007-2017' section: strengthen wording in relation to Access Strategy in Table 3 to "...FDSP <b>must</b> seek to..."	FDSP contains robust commitments to improving and expanding access provision;
<b>SNH comments on National Forest Estate Strategic Plan which are also relevant to Lochaber Forest District</b>		FDSP Changes
	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	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)</p>
	<p>Access and Health: Should include a commitment to safeguard paths where possible</p>	<p>National strategic plan commits to protecting public rights of way in forest design and management planning</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
	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 'Scotland's Woodlands and the Historic Environment' provides comprehensive coverage of built and natural elements of the historic environment

### Changes to the Lochaber Forest District Strategic Plan arising from wider consultation

Table 7.2 below summarises the most substantive comments received on the draft Lochaber Forest District Strategic Plan 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 LFDSP AND FES RESPONSE**

Consultation Comment	Response	Amendment made to the Plan?
<b>General</b>		
<i>Duplicate institutional responses above.</i>		
<b>Climate change</b>		
Page 38 - table 5, under "Renewable energy" we would prefer to see each renewable energy proposal being judged on its merits. The current wording fails to recognise e.g. those proposals which could have an impact on the natural heritage of non-designated parts of the forest estate. There is a statement that designations will "severely limit opportunities for large-scale wind farm development" but this is not demonstrated.		
Flood risk is a significant issue for many parts of Scotland now and it is relevant to be identified in all district plans with extended discussion in plans such as the one for Moray where the issue is especially important. Both SEPA and FCS have a duty to promote sustainable flood management under the Water Environment and Water Services (Scotland) Act 2003 as a requirement of the Water Framework Directive. A key element of sustainable flood management and Scottish Planning Policy 7 Planning and Flooding is the avoidance of flood risk in the first instance and any proposals should be guided by this principle.	Noted	
SEPA welcomes the FSPs clear policies to deliver its component of the River Basin Management Plans and implement agreed actions to achieve good	Noted	The potential role of forestry in sustainable flood management and

Consultation Comment	Response	Amendment made to the Plan?
ecological and chemical status. However, as highlighted in SEPA's corporate response the District Plans vary in their implementation of RBMP and SEPA would like to see a more specific, up to date, reference to the Water Framework Directive and the Area Management Plan.		wider river basin management is being explored through the preparation of river basin management plans. Control of woodland removal will also be followed, as will emerging guidance on the management of steep slopes.
<b>Timber</b>		
Much more emphasis should be given to downstream industry. BSW are about to make the largest single investment in sawmilling at Fort William and yet this is hardly recognised in the Strategic plan. There is also no recognition of downstream employment, a quick mention on page 18. Much more should be made of the employment figures and also recognition given that these are full time continuous positions in rural locations	Noted	More emphasis has been placed on the importance of the mill and the planned expansion.
<b>Business Development</b>		
SEPA would encourage FES to contact SEPA's relevant planning unit at the very earliest stage of considering any new proposals so that they are as well informed as possible about the regulatory requirements and SEPA's policy positions.	Noted	
<b>Community Development</b>		
SEPA's approach to foul drainage is set out in SEPA's policy on the Provision of Waste Water Drainage in Settlements. Generally the environment can accommodate foul drainage from small scale development within the countryside therefore SEPA does not oppose environmentally acceptable private sewage provision for dispersed housing in small settlements with limited or no public sewerage. However concerns increase with the cumulative impact from a proliferation of private foul drainage systems or where effectively new settlements are proposed that are not supported by suitable public infrastructure. SEPA would welcome if the FES ensure that the plans supported SEPA's foul drainage policy position. Policies which promote land for business development should make mention of the requirement that the development be sensitively located and when of significant scale, services by public infrastructure. Some Plans correctly make reference to ensuring that proposals accord with the relevant development plan; it would be relevant for all Plans to say this.	Noted	
<b>Access and Health</b>		
<i>No substantive comments</i>		
<b>Environmental Quality</b>		
6. Page 36 – The area is now a Geopark.	Noted	Plan amended
<b>Biodiversity</b>		
In general we very much welcome the thrust of the document and the continuing progress towards delivery of multi benefit forestry management. The District has a large number of important habitats and species under its management and the Strategy	Noted	District plans for BAP species are prepared and actioned.

Consultation Comment	Response	Amendment made to the Plan?
highlights many of the relevant opportunities available to benefit some of these. Those that we regard as high priority are: black grouse, osprey, white tailed eagle, goshawk, honey buzzard, crossbill spp, crested tit, golden eagle, ring ouzel, golden plover, native pinewoods, Atlantic oakwoods, wet woods		
SNH welcomes the production of the Lochaber Forest District Strategic Plan. By its nature it is not very specific but it provides a useful overview of how Forest Enterprise Scotland intends to deliver its National policies at a District level. We concur with the Priority Issues identified for Lochaber Forest District against the national biodiversity theme and support the aspirations identified for this theme. For example, we are pleased to see the Forestry Commission Scotland's commitment to the creation of forest habitat networks and to the control of non-native (exotic) species. We recognise and support the frequent references to partnership working and working with others and look forward to developing a closer working relationship with Forest Enterprise Scotland.	Noted	The district holds and will continue to hold regular liaison meetings with other agencies especially SNH.
<p>we [SNH]highlight the following specific points, which concern issues relevant to SNH:</p> <ol style="list-style-type: none"> <li>1. Page 12 – Loch Garry has been identified as a potential SPA, not notified as such. The date for this should be November 2007 not August 2006. The site of special scientific interest has been notified.</li> <li>2. Page 13 – There are two NNRs, Glen Roy and Ariundle, not one.</li> <li>3. In the table: Ben Nevis is also an SAC and is a mixed SSSI not a geological one. Strictly speaking, Parallel Roads of Lochaber is a geomorphological site. Leanachan SSSI is biological, not geological. Ariundle is part of Sunart SAC, not a separate site. The list omits Onich to North Ballachulish Woods SAC (oakwood and upland ashwood) and Onich Woods and Shore SSSI, which is mixed. Generally, the table appears inconsistent in its use of terms for notified interests/qualifying features. Also, comparing with page 34 it is not possible to reconcile the table and the text.</li> <li>4. Page 34 – Not clear whether the numbers of designated sites refer to the Forest District Area (i.e. Lochaber) or the Forest Estate. Either way they are incorrect.</li> <li>5. Reference to Appendix 5.6, but there is no such appendix.</li> <li>8. Page 50 – “Priority habitats” refers to “The % SSSI and other designated sites in favourable or unfavourable condition” This should, more accurately, refer to The % SSSI and other designated sites’ features in favourable...”</li> </ol>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>Plan amended</p> <p>Plan amended</p> <p>Plan amended</p> <p>Plan amended</p> <p>Plan changed</p> <p>Plan amended</p>

Consultation Comment	Response	Amendment made to the Plan?
9. Page 51 – Under “geology” it is not clear what is meant by the reference to “Measure impacts on the SSSI by site condition monitoring.” What SSSI? Is FES doing the monitoring rather than SNH? Clarification of this text would be helpful.	Noted	Plan amended
Half of the district is non-afforested land and therefore we recommend that the following bird species are added to the list of priorities as the district supports these important species and could positively manage for them; ring ouzel, golden plover and golden eagle	Noted	Plan amended
Although the Forest District Strategic Plan is an overarching document, we feel that some of the aspirations identified in Section 5 e.g. control exotic plant species to a manageable level would benefit from a little more detail and/or clearer targets.	Noted	Targets used wherever possible. Reference made to other local plans.
Over 30% of the FES landholding is open ground, of which 21% is moorland / rough grazings. We feel more should be made of the opportunities available to FES to deliver their biodiversity duty through appropriate management of open ground, which is why we have recommended inclusion of three of the key species associated with this habitat.	Reference is made to the management of uplands	The SP refers to other local plans for specific site and species management.

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

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

Together with the assessment of the Lochaber 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 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 LFDSP 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 Lochaber 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.