

POST-ADOPTION SEA STATEMENT – COVER NOTE

PART 1

To: SEA.gateway@scotland.gsi.gov.uk

or

SEA Gateway
Area 1 H (Bridge)
Victoria Quay
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PART 2

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

Scottish Lowlands 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:

Scottish Lowlands 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 | Scottish Lowlands Forest District Strategic Plan (SLFDSP) 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 Scottish Lowlands 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 Scottish Lowlands (Edinburgh and Glasgow, the Lothians, Falkirk, southern Fife, Clackmannan, East and West Dunbartonshire, Renfrewshire and East Renfrewshire, North and East Ayrshire and Inverclyde Council Areas. Parts of Stirling, West Dunbartonshire and South Ayrshire). |
| Summary of nature/content of PPS | The SLFDSP 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 Scottish Lowlands 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 SCOTTISH LOWLANDS 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 Scottish Lowlands Forest District Strategic Plan 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 SLFDSP 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 SLFDSP to ensure a robust approach to the avoidance of negative environmental impacts.

TABLE 6.1

| SEA issue | Existing problem? | Impact of SLFDSP | 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 SLFDSP or reason for not having taken this into account |
|--------------|--|--|--|--|---|
| Biodiversity | Overall decline in biodiversity, sensitivity of international, national and locally important nature sites. | Renewable energy initiatives have the potential for negative effects on biodiversity through causing disturbance to species and habitats through engineering works or planting for biomass | <p>Environmental protection policies should be extended to cover any potential use of the Forest Estate</p> <p>The renewable energy policy should state that no project will be promoted on Forest Estate land where there will be negative effects on biodiversity</p> <p>Renewables projects are subject to planning consent, conferring an additional layer of protection to biodiversity</p> | <p><i>The NFESP provides assurance that environmental issues will be taken into consideration in relation to renewable energy developments.</i></p> | SLFDSP (Policy 1.1) states that renewable energy projects will have regard to landscape and biodiversity. |
| Biodiversity | <p>Overall decline in biodiversity, sensitivity of international, national and locally important nature sites.</p> <p>Potential climate change effects</p> | The development of the forest road network (particularly on Arran) in response to the timber transport policy may have negative effects on biodiversity through habitat damage and disruption | <p>Environmental protection policies should be extended to cover any potential use of the Forest Estate</p> <p>The timber transport policy should explicitly state that no significant impacts to biodiversity will occur as a result of Forest District operations</p> <p>The policy should also ensure that enhancement of the forest road network does not divert attention from exploring more sustainable transport options</p> | <p><i>The NFESP includes a clear commitment to the sustainable transportation of timber and aims to provide efficient transport whilst securing social and environmental benefits.</i></p> | Arran is no longer included within the restructured Forest District area. |

| SEA issue | Existing problem? | Impact of SLFDSP | 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 SLFDSP 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 and support for local businesses may have context-specific effects on biodiversity, depending on the location and nature of the business opportunities | Environmental protection policies should be extended to cover any potential use of the Forest Estate Both policies should state that any business explicitly supported by the Forest District, or promoted on Forest Estate land, should conform to wider FCS social and environmental standards | <i>The NFESP provides some clarification on land disposal and acquisition, for example by prioritising examples which will contribute to forest habitat networks.</i> | NATIONAL FOREST ESTATE STRATEGIC PLAN covers this issue |
| Biodiversity | Overall decline in biodiversity, sensitivity of international, national and locally important nature sites. | Greater public access and recreational use of the forest may result in localised disturbance of species and damage to habitats | Environmental protection policies should be extended to cover any potential use of the Forest Estate The access policy should state that public use and enjoyment of the forest resource will be sustainable promoted and managed to ensure no net damage to the natural environment | <i>The NFESP includes a commitment to carry out research into the environmental impacts of recreation on the Forest Estate.</i> | NATIONAL FOREST ESTATE STRATEGIC PLAN covers this issue |
| Population and human health | Visual intrusion, limitations on access, potential impact on tourist revenues | Renewable energy developments and other non-timber sources of income may limit public access to adjacent woods and forests and damage amenity values through visual intrusion | The FDSP environmental protection policies should be strengthened to cover any potential use of the Forest Estate The renewable energy policy should be amended to ensure that any such proposal will have no negative impacts on access or local quality of life Renewables development is subject to planning consent, through which impacts on communities would be considered | <i>The NFESP provides assurance that environmental and social issues will be taken into consideration in relation to renewable energy developments.</i> | The SLFDSP Policy 1.1 states that renewable energy projects will have regard to 'public access, community and economic values'. |

| SEA issue | Existing problem? | Impact of SLFDSP | 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 SLFDSP or reason for not having taken this into account |
|----------------|---|---|---|--|---|
| Water and soil | Damage to the water and soil environments | Forest expansion as a result of the new woodlands policy may have negative effects on soils and create the potential for run-off and contamination of watercourses | <p>A robust soil protection policy should be added to the FDSP to safeguard this most fundamental resource</p> <p>Adherence to the 'Forests and Soils' guidelines is assumed</p> <p>Short term negative impacts, especially through planting on former agricultural land, may be offset by increased stability as the woodland matures and carbon retention</p> | <p><i>The NFESP states a requirement to comply with Forestry Commission Soil and Water Guidelines, though it is recommended that this approach should be extended to non-forestry activities promoted or facilitated by FES on the Forest Estate.</i></p> | Two additional policies added to the SLFDSP (6.3 and 6.4) outlining protection for soils. |
| Water and soil | Damage to the water and soil environments | <p>Forest expansion and continued intensive extraction and planting under the timber supply policy may have negative effects on soils and create the potential for run-off (especially in areas of clearfell)</p> <p>Expansion of the forest road network proposed in the timber transport policy will cause localised damage to soils and drainage regimes</p> | <p>A robust soil protection policy should be added to the FDSP to safeguard this most fundamental resource in the course of any potential use of FE land</p> <p>Adherence to the 'Forests and Soils' guidelines is assumed</p> <p>The roll-out of lower impact silvicultural systems will help limit damage to soils and the water environment through more sustainable management practices. As the woodland matures, the consolidation of soils will reduce the potential for contamination of watercourses through nutrient-rich runoff</p> <p>The timber transport policy should be amended to ensure that best practice in soil handling will be followed at all times</p> | <p><i>As previously stated, the NFESP states a requirement to comply with Forestry Commission Soil and Water Guidelines.</i></p> <p><i>The NFESP also commits to using sustainable forms of timber transport where possible and aims to reduce the associated environmental impacts.</i></p> | Two additional policies added to the SLFDSP (6.3 and 6.4) outlining protection for soils. |

| SEA issue | Existing problem? | Impact of SLFDSP | 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 SLFDSP or reason for not having taken this into account |
|----------------|---|--|--|---|---|
| Water and soil | Damage to the water and soil environments | Non-timber sources of income may be potentially harmful | <p>Effects of this policy are likely to be localised and dependent on the nature of development</p> <p>A robust soil protection policy should be added to the FDSP to safeguard this resource during any development of the Forest Estate</p> <p>The policy should state that any business opportunity promoted on Forest Estate land should be in keeping with wider FCS social and environmental standards</p> <p>Many possible sources of diversified income (e.g. renewable energy, affordable housing, communications masts) are subject to planning consent, and as such convey an additional level of protection to the natural environment</p> | | New soil protection policy (6.4) particularly in relation to coal and mineral extraction. New text to ensure that all tourism and recreation developments take into account impacts on the environment, soils, water, waste and travel. |

| SEA issue | Existing problem? | Impact of SLFDSP | 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 SLFDSP or reason for not having taken this into account |
|----------------|---|---|---|--|---|
| Water and soil | Damage to the water and soil environments | <p>Access policies could result in erosion from increasing numbers of visitors using the path and ride network</p> | <p>A robust soil protection policy, designed to safeguard the resource from any potential use of FE land, should be added to the Plan</p> <p>Access policies should be amended to state that public use and enjoyment of the forest will be sustainable promoted and managed to ensure no negative effects on the natural environment</p> <p>Infrastructure should be upgraded to cope with any increase in visitor numbers and intensification of use (e.g. mountain biking)</p> | <p><i>The NFESP commits to undertaking research into the environmental impacts associated with recreation and tourism on the Forest Estate.</i></p> | <p>New policy within the SLFDSP (5.1) to ensure that ‘recreation infrastructure is managed in accordance with internal guidance and is safe and welcoming’.</p> |
| Air | Diminishing air quality | <p>The timber supply policy may result in an increase in road haulage, damaging air quality</p> <p>Timber transport policy could further entrench the role of road haulage through expansion of the forest road network</p> | <p>Both policies should be strengthened to improve the District’s commitment to exploring more sustainable (non-road) haulage solutions, as well as reducing the effects of road transport</p> | <p><i>The NFESP includes a commitment to the use of sustainable timber transport where possible including the use of sea and rail; this will help address the impact on the forest road network.</i></p> | <p>New Timber Transport policy (2.11) ‘use low ground pressure vehicles and support trials that further reduce environmental impacts and costs’.</p> |

| SEA issue | Existing problem? | Impact of SLFDSP | 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 SLFDSP or reason for not having taken this into account |
|-----------|---|---|---|---|---|
| Air | Diminishing air quality Potential climate change effects | Non-timber sources of income and support for local businesses may result in increased private car use in accessing improved tourist facilities, or in haulage related to biomass operations. | Air quality policy should be strengthened to include all potential uses of the Forest Estate Both policies should be enhanced to ensure that any business opportunity explored on FE land, or with explicit Forest District support, conforms to wider FCS social and environmental standards The development of mineral extraction sites – specifically opencast coal in the Midland Valley – will create large amounts of primary emissions from the use of heavy machinery and also contribute to secondary emissions from the coal itself | <i>An amendment was made in the NFESP in relation to renewable energy as this is likely to be the most prevalent non forestry development to state that best practice should be put in place.</i> <i>In addition, any developments will go through the normal planning procedures which will include environmental safeguards.</i> | New text to ensure that all tourism and recreation developments take into account impacts on the environment, soils, water, waste and travel. |
| Landscape | Damage to landscape quality | Renewable energy development may have a negative effect, if inappropriately located | The policy should be strengthened to ensure that no such projects will be considered where they may affect areas of high landscape value The landscape quality policy should be strengthened to cover any potential use of Forest Estate land, in addition to more traditional forestry practice | <i>The NFESP includes a commitment to reducing the environmental impact of renewable energy developments on the Forest Estate. Designated landscapes are also afforded additional protection through the NFESP's environmental quality policies.</i> | NATIONAL FOREST ESTATE STRATEGIC PLAN covers this issue |

| SEA issue | Existing problem? | Impact of SLFDSP | 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 SLFDSP or reason for not having taken this into account |
|-----------|-----------------------------|--|---|---|---|
| Landscape | Damage to landscape quality | <p>Non-timber sources of income and support for local businesses may have detrimental effects on landscape quality, depending on the location and nature of the opportunities pursued</p> | <p>The landscape quality policy should be strengthened to cover any potential use of Forest Estate land, in addition to more traditional forestry practice</p> <p>Both policies should be strengthened to ensure that any business opportunity explored on FE land, or operating with explicit Forest District support, should conform to wider FCS social and environmental standards and have no detrimental effect on the landscape</p> <p>Mineral extraction sites have dramatic negative impacts on the landscape, although planning conditions and restoration schemes can often improve landscape values in the longer term (particularly in reworking derelict areas)</p> | <p><i>Designated landscapes are afforded additional protection in the plan due to the inclusion of specific environmental protection policies relating to landscape preservation.</i></p> | <p><i>NATIONAL FOREST ESTATE STRATEGIC PLAN covers this issue</i></p> |

| SEA issue | Existing problem? | Impact of SLFDSP | 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 SLFDSP or reason for not having taken this into account |
|----------------------|--|--|---|--|---|
| Historic environment | Damage to the fabric or setting of cultural heritage sites | Renewable energy and other non-timber sources of income may impact on cultural heritage either through engineering works or visual intrusion on their setting | <p>The cultural heritage policy should be strengthened to cover all potential uses of Forest Estate land</p> <p>Both policies should be altered to state that diversification initiative involving engineering works will be steered away from areas of high cultural heritage value</p> <p>Renewable energy projects are subject to planning consent, through which the cultural heritage and historic landscape impact of any development would be assessed</p> | <i>The NFESP includes a commitment to reducing the environmental impact of renewable energy developments on the Forest Estate.</i> | Cultural heritage policies expanded. |
| Historic environment | Damage to the fabric or setting of cultural heritage sites | Afforestation as a result of the new woodland policy and intensive management through the timber supply policy will result in inevitable contact with archaeological remains | <p>The cultural heritage policy should be amended to stipulate compliance with the 'Forests and Archaeology' guidelines in the course of all operations.</p> <p>It should also require full, professional, archaeological survey in the planning stage of any large-scale planning initiative to ensure effective protection and incorporation of sites in forest designs</p> <p>Natural regeneration of woodlands should also be actively managed to ensure trees do not take root on archaeological sites and monuments</p> | <i>The NFESP includes a suite of policies which address these concerns.</i> | <i>All historic environment features will be recorded and considered as part of the Forest District historic environment database that the FCS archaeologist is working on with the Forest Districts. See also the publication "Scotland's Woodlands and the Historic Environment".</i> |

| SEA issue | Existing problem? | Impact of SLFDSP | 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 SLFDSP or reason for not having taken this into account |
|----------------------|--|--|---|--|--|
| Historic environment | Damage to the fabric or setting of cultural heritage sites | <p>Non-timber sources of income and support for local businesses may result in negative effects on cultural heritage, depending on the nature, scale and location of the business</p> | <p>The cultural heritage policy should be strengthened to cover all possible uses of Forest Estate land.</p> <p>Both policies should be strengthened to stipulate that any business opportunity promoted on FE land, or explicitly supported by the Forest District, should comply with wider FCS social and environmental standards. The policies should state that projects will be steered away from areas of high cultural heritage value, and will not be considered where they are likely to damage sites or their setting</p> <p>Developments, such as visitor centres, renewables and mineral extraction require planning permission, and cultural heritage impacts will be considered in the process</p> | <p><i>The NFESP includes a suite of policies which address these concerns.</i></p> | <p>The NFESP covers these issues. <i>See also the publication "Scotland's Woodlands and the Historic Environment".</i></p> |

| SEA issue | Existing problem? | Impact of SLFDSP | 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 SLFDSP or reason for not having taken this into account |
|----------------------|--|---|---|---|---|
| Historic environment | Damage to the fabric or setting of cultural heritage sites | Community engagement initiatives – particularly community woodlands or renewables – may hamper access to ancient monuments | <p>This policy should be strengthened to ensure that communities are able to fully appreciate the value of cultural heritage sites and are encouraged to incorporate them into community woodland designs</p> <p>The policy should also state that no community development scheme will be supported should it have a negative effect on archaeological sites</p> <p>The cultural heritage policy should be amended to ensure that all possible uses or the Forest Estate are covered</p> | <i>The NFESP includes a suite of policies which address these concerns.</i> | <i>The NFESP covers these issues. See also the publication “Scotland’s Woodlands and the Historic Environment”.</i> |
| Historic environment | Damage to the fabric or setting of cultural heritage sites | Access policies may result in rising visitor numbers, with concurrent increases in pressure on sites and monuments from erosion, vandalism and accidental damage | <p>The cultural heritage policy should be strengthened to guarantee protection from any potential use of the Forest Estate</p> <p>Access policies should be enhanced by stating that public access to and enjoyment of cultural heritage sites will be sustainably promoted and managed to ensure no damage is sustained and that monuments are appropriately conserved and, if necessary, consolidated</p> | <i>The NFESP includes a suite of policies which address these concerns.</i> | <i>The NFESP covers these issues. See also the publication “Scotland’s Woodlands and the Historic Environment”.</i> |

| SEA issue | Existing problem? | Impact of SLFDSP | 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 SLFDSP or reason for not having taken this into account |
|----------------------|--|---|---|---|---|
| Historic environment | Damage to the fabric or setting of cultural heritage sites | Cultural heritage policy currently makes no provision for archaeological operations or conservation in advance of forest operations or development | The policy should be strengthened through the requirement for professional archaeological survey and investigation in advance of any significant forest operation and building or upgrading of infrastructure not normally requiring planning permission (e.g. road construction and upgrading, quarrying for roadstone etc. which are covered by General Permitted Development Order 1992) | <i>The NFESP includes a suite of policies which address these concerns.</i> | <i>Extended protection for unscheduled monuments and new policy to ensure that all forest plans include the historic environment.</i> |

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

The sections below detail the comments received during the SEA process from the consultation authorities (Table 7.1) and those from the general consultation on the Consultative Draft of the SLFDSP (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 | 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 | SLFDSP Amendments: Key theme 6: Environmental Quality commitment to the WFD and River basin management plans. NFESP Amendments: Text amended |
| | Inclusion of a soil protection policy is vital (as per ER recommendations), as stipulating adherence to Soils and Water guidelines is insufficient mitigation. | SLFDSP Amendments: New policy (6.03) to comply with soil guidelines. NFESP Amendments: Note climate change action plan mentions that the woodland expansion rationale sets out that FES should move away from peat based soils for woodland expansion. Climate action plan makes various references to protecting soil through management activities and areas of concern that warrant more attention. Note also that the guidelines are being revised to develop a more updated series. |
| | Tourism / eco-tourism could have negative effects on soil & water, material assets and air objectives due to increases in visitor numbers, the amount of travel involved and the amount of waste generated | New text in Theme 3 under 'Tourism' heading to ensure that all tourism and recreation developments are mindful of impacts on the environment, soils, water, waste and travel. |
| The Scottish Ministers (Historic Scotland) | No substantive comments | |

| 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 Natural Heritage | | |
| | Timber policies should be cross-referenced with biodiversity policies to ensure that natural heritage benefits are given due consideration in the forest design process - as timber policies may currently affect biodiversity through the continued concentration of non-native conifers | Additional text added under the Timber theme, the 'Timber supply' heading to state that 'High quality forest planning, which balances a broad range of environmental and social issues as well as landscape impacts in establishing a productive supply of timber'. |
| | Hardwood sector development policy should be cross-referenced with timber transport policies to ensure best practice in timber transport (as there are currently no suitable hardwood processors in close proximity). Could also suggest concentrating on developing local markets for hardwood timber? | New hardwood timber policies. |
| | Timber policies should include a stronger commitment to protecting and enhancing landscape quality through the adoption of LISS/continuous cover wherever feasible. | Additional text added under 'Timber Supply' as noted above. But existing policy 2.8 sets out commitment to a revised thinnings plan which will cover the LISS area. |
| SNH comments on National Forest Estate Strategic Plan which are also relevant to Scottish Lowlands FD | | |
| Theme | Comment | Scottish Lowlands FDSP Amendments |
| Climate change | Recognise the role of soils as carbon stores | New text under Environmental Quality theme stating that soils are vital for their filtering and transforming functions and for carbon storage. |
| | Add a clearer statement to theme regarding working with natural processes in adapting to climate change (e.g. flood plain restoration) | New text on role of forests in flood and catchment management. |
| Business Development | The potential social effects of non-forestry developments on the National Forest Estate should be minimised through more explicit social criteria for such projects | Policy 3.13 sets out the need for developments to support local and national FCS objectives. |
| 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) | Existing policy under Access and Health (5.8) 'to continue to make our woodlands more accessible to a wider range of people with different abilities'. |
| | Need more active promotion of Core Paths, the SOAC and the wider access network, in conjunction with local authorities | New text on access legislation. |
| | Should include a commitment to safeguard paths where possible | New policy 5.10 to 'protect public rights of way'. |
| Environmental Quality | Should contain references to the importance of soil for biodiversity – both within the soil itself and its wider influence | No explicit mention but new soil protection policies. |

| CONSULTEE / RESPONDENT (ALPHA ORDER BEGINNING WITH THE CONSULTATION AUTHORITIES) | SUMMARY OF COMMENTS | HOW THE COMMENT WAS TAKEN INTO ACCOUNT IN MAKING THE DECISION TO ADOPT THE FINAL PPS |
|--|--|---|
| | Need to acknowledge the importance of soils as carbon sinks AND a potential source of Green House Gases. | Additional text under the Environmental Quality theme stating that soils are vital for their filtering and transforming functions and for carbon storage. |
| | Cultural heritage section focuses on built heritage, but should also include references to 'living cultural heritage' e.g. veteran trees, anthropogenic vegetation patterns (e.g. wood pasture, coppice) relating to ancient patterns of woodland and landscape management | The 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) | New text under Biodiversity theme stating the importance of habitat mosaics, transitional zones and habitat networks minimising fragmentation. |
| | No clear objectives are given for native woodlands that are not AW, PAWS or designated sites. Important as components of habitat networks and often in poor condition | New policy (7.1) to 'safeguard native woodland remnants...' |
| | Discussion of deer limited to mitigating their negative effects on biodiversity. Should highlight that sustainable grazing should be an essential part of maintenance and enhancement of biodiversity in woodlands – requires active management rather than just prevention of damaging impacts. | Text notes the use of damage assessments which is a form of active management. |
| | 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 | Additional text under Biodiversity theme recognising geodiversity. |
| | Need to monitor habitat fragmentation / connectivity (despite obvious difficulties) | New text under Biodiversity theme stating the importance of habitat mosaics, transitional zones and habitat networks minimising fragmentation. |

Changes to the SLFDSP arising from wider consultation

Table 7.2 below summarises the most substantive comments received on the consultative draft **SLFDSP** 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 SLFDSP AND FES RESPONSE

| Consultation Comment | Response | Amendment made to the Plan? |
|---|--|--|
| General | | |
| The District is working closely with Local Authorities. | Agreed and this is continuing. | See response |
| There is a clear picture of how FES will implement the SFS FSP-104. | Noted | See response |
| The Plan would benefit from being more clearly set in the context of the current Government's overarching aim of sustainable economic development and five constituent aims, particularly healthier, fairer and greener. | Single national format for all District Plans. | See response |
| Climate change | | |
| Renewable Energy – we think it would be better in terms of biodiversity to survey any areas felled for wind farm development to determine if there would be more value from leaving them unplanted rather than automatically replanting (e.g. some afforested areas are on blanket bog that could be restored following felling for wind farm development). | This is done as part of Forest planning. In some areas they have been left unplanted (this includes some 500ha at Whitelee). | Yes, text now covers mitigation and environmental benefits |
| RSPB Scotland supports the use of renewable resources, however wind farms should be located in sites that do not have significant biodiversity impacts. The necessary dialogue between forestry and developers does not always take place and therefore schemes do not always minimise environmental impacts and maximise positive habitat benefits. | Developers are generally searching in local authority preferred areas. Schemes do have dialogue between FES and developers, EIAs informed by site monitoring, and mitigation measures. | Yes, plan text addresses this better. |
| There is no mention of peatland restoration in the climate change theme. We believe that sites for restoration exist in the Scottish Lowlands district and that an increase in the area of active blanket and raised bogs would store carbon as well as deliver biodiversity targets. | Agree | Yes, additional text under both climate change and soils. |
| Timber | | |
| Need to make mention of the local Timber Transport Group, the public road network and the impact of timber on the road network. | Agreed | Yes, plan text changed to make this clearer and new policy at 2.10 |
| Timber transport aspirations are required for: reduction in road miles, reduced impact on communities and improved access to constrained forests. | Agreed | Yes, plan text now better reflects this. |
| Business Development | | |
| Agree with the community engagement approach. In particular there needs to be more done to encourage young people to consider a career in the forestry sector. | Noted, and agree | Yes, plan does now have an aspiration to develop the link to rural skills development and the forestry apprentice scheme with specific policies 3.2 and 3.4. |

| Consultation Comment | Response | Amendment made to the Plan? |
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| The Plan should give a greater emphasis to the potential impact of activity within the National Forest Estate on neighbouring areas such as the proposal to “Realise economic potential” through the further development of renewable energy and mining, and the potential for further afforestation of land to affect other interests (e.g. feeding and roosting geese from Salamanca Plateau SPA). | Agree | Yes, text better reflects the need to balance developments with other objectives. |
| Community Development | | |
| The principle of partnership should be spelt out more explicitly throughout the plan in the context of the SEARS requirements for public bodies and in the context of the wide range of partnerships already in existence with which the Forest District should engage to deliver more for the Scottish Forestry Strategy (e.g. Central Scotland Green Network, Glasgow Clyde Valley Green Network, Forth and Clyde River Basin Area Advisory Groups, East Ayrshire Woodlands Partnership, Community Planning Partnerships etc). | Agree, though not all are mentioned by name we are working with most of these listed and many more. | Yes, section on partnership working developed in the revised plan |
| Balance of Carron Valley and the ‘goodness’ it provides with the negative of people travelling with ‘emissions’, what opportunities are there where people are? Woodlands In and Around Towns discussed at length (WIAT). | Agreed, and some text edits made. | Yes, Carron valley noted in the text and emphasis on day visits and family visits, there is increased emphasis throughout on WIAT and woods near to people. |
| Stirling Council has obtained funding through WIAT and is keen to work with the Scottish Lowlands Forest District when carrying out strategic structure planning for the future planned development of 2,500 houses to the south east of Stirling. | Noted, district interested in the principle and been in discussions with Council over WIAT potential. | Yes, text changes to reflect this and a specific policy at 4.3. |
| Access and Health | | |
| Need more commitments to the use of the forest estate for the expansion of cycling and mountain biking. This should also include commitments to the further provision of facilities for horse riders. | There is a ministerial direction not to have more purpose built mountain bike trail. Agreed there is more potential for other users like horse riding | Text changes to include reference to other users including horse riding potential with policy at 5.7. |
| Opportunity at Whitelee Windfarm for tourism and recreation, particularly for horse riding. | We do not agree there is an extensive tourism opportunity at Whitelee. We are working with local authorities there to establish some additional recreation facilities and have put in horse friendly gates. We agree there is more that could be done for horse riders | Specific action 5.7 to explore this potential. |
| Health and safety is essential to an acceptable and realistic degree but not to the detriment of everyone having a good safe time. | Agreed | |
| Need for more equestrian access and recreation. | Agreed there is more potential for other users like horse riding | Text changes to include reference to other users including horse riding potential with action at 5.7. |

| Consultation Comment | Response | Amendment made to the Plan? |
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| Support for the development of the Carron Valley for mountain biking. | We will not be developing new mountain bike facilities at Carron Valley but will be developing multi purpose trails and doing improvements to the existing trails to meet new guide lines on trail standards | See response |
| I would prefer that this site is further developed than small mountain biking developments at many sites – it is obviously important to keep a wide range of uses for forestry in the area. | There is a ministerial direction not to have more purpose built mountain trail. Though we will be doing improvements to the existing trails to meet new guidelines on trail standards | See response |
| In particular, we welcome the focus on providing amenity woodlands and green space for the huge urban population covered by the District, with the continuing employment of forest rangers and wardens. | Noted and covered in the text. | See response |
| Need more focus on true multi use access | Multi use access is essential and is part of our operating principles | Yes, policy 5.8 reflects this point. |
| We are supportive of the FCS involvement in the Easterhouse area and in particular, with the Gartloch-Gartcosh project being developed as part of the Glasgow and Clyde Valley Green Network. | Noted and we have a commitment to these sites over the long term | See response |
| Environmental Quality | | |
| Designed Landscapes and the general overlap with locally protected landscapes such as the Regional Scenic Areas and Areas of Great Landscape Value should be defined in Development Plans. | Agreed | Yes, text changed to cover landscape importance and designations. |
| Biodiversity | | |
| A more comprehensive description could be made here by describing the hierarchy of designated nature conservation sites within the Forest Estate from international to national (SSSIs, Geological Conservation Review sites) to local (SINCs, PAWs). | Agreed | Yes, text changed to better reflect this. |
| This section should also be updated to include the SNH Species Action Framework and the recently published invasive Non-native Species Strategy. | Species action plan not referenced. There is a focus on woodland priority species and habitats. | Yes, text references to invasive species actions |
| It would be useful also to highlight the role of the Forest Estate in supporting European Protected Species such as bats, otters and great-crested newts. | Agreed | Yes, text changes to better cover this aspect. |
| The commitment to the natural care target would be better reworded as “We will aim to achieve favourable conservation status in all our SSSIs and Natural sites, and to achieve 95% in favourable or unfavourable – recovering condition by 2010”. | Agree with one year longer lead in time | Yes, policy 7.9 amended. |
| It would be helpful to set out European Protected Species as a separate category within this section. | Agreed | Yes text change to highlight the ones important in the district. |
| As stated in the draft strategic plan this district contains significant mineral resources. Where sites are mined for mineral extraction, we recognise there can be good opportunities to restore land to a habitat with improved biodiversity value. We would encourage all opportunities to be taken to create areas of native woodland or wetland habitats. | Noted and this is taken in to account in the text and in practice. | See response |

| Consultation Comment | Response | Amendment made to the Plan? |
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| New woodland planting must take cognisance of biodiversity objectives as well as climate change ones. The value of sites to non woodland species must be considered before any decision is made to plant with trees. | Agreed. And this is part of the forest planning process. | See response |
| We wish to highlight the importance of the Carron Valley forest to the small numbers of black grouse in the area and any plans to increase recreational useage should seek to avoid disturbance to these birds. | Agreed and this is covered in more detail in the Forest plan, with specific actions for improved habitats, and activities underway – new lek site found. | See response |
| We welcome the commitment to priority habitat and species work within this theme and we support the habitats and species listed as top priorities. However, we believe this section should also refer to LBAPs and the Scottish Biodiversity Strategy and aim to deliver the aims of both wherever possible. | National strategic plan has the link to Scottish Biodiversity Strategy and we pick up on local elements. | Yes, text changes to reflect local concerns and action at 7.13 to work with LBAP groups on LBAP delivery. |

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

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

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

- The ‘do-nothing’ option of continued implementation of the 1999 (updated in 2003) 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 1999 version and presented a more realistic and pragmatic solution than the local application of the Scottish Forestry Strategy. The SLFDSP 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 SLFDSP. 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.