

POST-ADOPTION SEA STATEMENT – COVER NOTE

PART 1

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or

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PART 2

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

Moray and Aberdeenshire Forest District Strategic Plan 2009-2013

The Responsible Authority is:

The Forestry Commission Scotland (FCS)

PART 3

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Signature & date

 24th May 2010

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1. BACKGROUND

Post-adoption SEA statement for:

Moray and Aberdeenshire 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@forestrv.gsi.gov.uk

4. KEY FACTS

Name of Responsible Authority	Forestry Commission Scotland (FCS)
Title of PPS	Moray and Aberdeenshire Forest District Strategic Plan (MAFDSP) 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 Moray and Aberdeenshire 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 Moray and Aberdeenshire Forest District (Highland Council area, from the Morvern peninsula to Glen Garry)
Summary of nature/content of PPS	The Moray and Aberdeenshire 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.
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 Moray and Aberdeenshire 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. The Moray and Aberdeenshire Forest District was created by the amalgamation of the formerly separate Aberdeenshire and Moray Forest Districts, following FES reorganisation in 2008. Draft Forest District Strategic Plans were produced for both, and these were subject to comprehensive SEA. The relevant findings and alterations recommended made in the relevant environmental reports have been taken into account in the production of the final plan and are detailed below.

The SEA process included the following activities:

- Taking into account the views of the Scottish Environment Protection Agency, Scottish Natural Heritage and the Scottish Ministers (Historic Scotland) regarding the scope and level of detail that was appropriate for the Environmental Report.
- Preparing an Environmental Report on the likely significant effects on the environment of the draft PPS which included consideration of:
 - the baseline data relating to the current state of the environment;
 - links between the PPS and other relevant strategies, policies, plans, programmes and environmental protection objectives;
 - existing environmental problems affecting the PPS;
 - the plan's likely significant effects on the environment (positive and negative);
 - measures envisaged for the prevention, reduction and offsetting of any significant adverse effects;
 - an outline of the reasons for selecting the alternatives chosen;
 - monitoring measures to ensure that any unforeseen environmental effects will be identified allowing for appropriate remedial action to be taken.
- Consulting on the Environmental Report which was undertaken in March 2008 for a period of 8 weeks.
- Taking into account the Environmental Report and the results of consultation in making final decisions regarding the PPS.
- Committing to monitoring the significant environmental effects of the implementation of the PPS. This will also identify any unforeseen adverse significant environmental effects and to enable taking appropriate remedial action.

6. HOW ENVIRONMENTAL CONSIDERATIONS HAVE BEEN INTEGRATED INTO THE MORAY AND ABERDEENSHIRE FOREST DISTRICT STRATEGIC PLAN AND HOW THE ENVIRONMENTAL REPORT HAS BEEN TAKEN INTO ACCOUNT

Forest District Strategic Plans sit within a wider policy framework which includes the Scottish Forestry Strategy, the National Forest Estate Strategic Plan (NFESP) and Forestry Commission guidelines and policies. The MAFDSP 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 Moray and Aberdeenshire Forest District Strategic Plans took into account this wider framework however several environmental issues were highlighted particularly in relation to non-forestry activities and land disposal and acquisition. As a result it was recommended that wherever practical further safeguards should be reflected in modifications to the FDSP prior to final adoption. Table 6.1 below sets out the key findings raised in the Environmental Reports 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 MAFDSP 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 MAFDSP, or reason for not having taken this into account
Biodiversity	Overall decline in biodiversity, sensitivity of international, national and locally important nature sites. Potential impacts of climate change.	Renewable energy policy and Non-timber sources of income policies could result in disturbance or damage to habitats	<p>The policies should be expanded to ensure the development of renewable energy schemes and enhanced leisure facilities do not have an adverse impact on biodiversity.</p> <p>The renewables policies should be altered to state that developments of this nature will be steered away from areas of high importance and sensitivity, and that all such schemes on FE land will conform to wider FCS social and environmental standards.</p>	The NFESP commits FES to giving due consideration to the potential community and environmental effects of renewables schemes.	<p>Policy M&A 1.01 states that FES will ‘assess and take forward the delivery of renewables projects in accordance with national and local planning procedures.’</p> <p><i>Planning decisions are required to take into account potential impacts on the environment, therefore significant effects on local biodiversity should be avoided through the planning and EIA processes</i></p>
		Access and health policies could result in an increase in disturbance and damage to habitats as a consequence of increased levels of recreation activity in forests	<p>The plan should note the objective of steering recreation activity to those areas which are at least risk of damage from recreation. FCS should work with SNH and Access Authority to ensure that access developments result in a net enhancement of biodiversity.</p> <p>More effective promotion of the leisure opportunities in woodland may increase car use for access</p> <p>Environmental quality policies should ensure that non-forestry activities, including access promotion and management, do not have a significant adverse impact on biodiversity.</p>	The NFESP includes a commitment for FES to undertake, in partnership with other agencies, research into the effects of access and recreation on the environments of the Forest Estate	<p>No specific references to balancing access improvement with environmental protection.</p> <p>However, Policy M&A 5.05 states that FES will operate an open access policy which is fully compliant with the Scottish Outdoor Access Code, which requires users to take responsibility for their behaviour to protect the environment.</p> <p>The plan’s biodiversity policies establish a robust framework for protecting and enhancing sensitive species and habitats through the forest planning process – which would include potential access enhancements.</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 MAFDSP, or reason for not having taken this into account
		Requirement to ensure that the Strategic Plan, and lower tier PPS do not affect the integrity of internationally important biodiversity sites.	The strategy should be clarified to ensure that the integrity of internationally designated sites is not affected by operations or activities. This should help ensure that the Strategic Plan reflects the provisions of ‘The Conservation (Natural Habitats, &c.) Amendment (No. 2) (Scotland) Regulations 2007’.	The NFESP includes a requirement to conduct Appropriate Assessment to ensure that activities do not affect the integrity of Natura 2000 sites.	Policy M&A 7.13 requires that the Forest District manage all designated sites in accordance with agreed management plans – which should avert the potential for significant impacts on notified interests.
Population and human health		Portfolio analysis and business development policies could have an impact on people’s quality of life Through land disposal and subsequent development	Clarification of policy on land disposal and suitability of developments on the Forest Estate.	The NFESP provides some clarification on land disposal and acquisition. For example, prioritising proposals which will contribute to Forest Habitat Networks or meet WIAT objectives.	Disposals of land from the forest estate are assessed on the basis of the public interest. Potential environmental impact is therefore an important consideration. Similarly, any proposal for development resulting from land disposal would be required to comply with local and national planning policy, providing a further check on significant environmental effects.
		Business development and rural diversification could have negative effects on local communities	Clarification of policy to highlight importance of business developments meeting wider FCS social and environmental standards. Environmental quality policies should ensure that non-forestry activities, including business development, do not have a significant adverse impact on communities.	The NFESP undertakes to give due consideration to potential effects on communities of diversification schemes – particularly renewable energy.	Policy M&A 3.05 explicitly states that FES will encourage local businesses that ‘match our social and environmental standards’ Policy M&A 3.10 states that FES will ‘consider sensitive non-forest enterprises with full stakeholder consultation where development proposals are unlikely to damage other objectives.’ This will enable communities to have an early say in any development proposals, and should screen out uses with adverse effects.

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 MAFDSP, or reason for not having taken this into account
		<p>Business development and renewable energy policies could affect local communities through impaired access and detrimental effects on the leisure and tourism industries</p>	<p>Policies should be strengthened to ensure that no proposed business activities on the Forest Estate significantly impede public access or hamper use and enjoyment of the forest resource.</p>	<p>The NFESP provides assurance that community issues will be taken into account in relation to renewable energy projects. It would be beneficial to reflect this approach within the finalised FDSP and, given the emphasis on increasing income from non-forest activities, extend this approach to other forms of development or land use change on the Forest Estate.</p>	<p>Policy M&A 3.10 states that FES will 'consider sensitive non-forest enterprises with full stakeholder consultation where development proposals are unlikely to damage other objectives.' This provides robust protection of other interests where development opportunities arise on the forest estate.</p>
<p>Water and soil</p>	<p>Detrimental effects on the water and soil environments</p>	<p>Business development and Community development policies may impact on soil due to the absence of a strong soil protection policy, and a lack of environmental protection policies for non-forestry activities</p>	<p>A robust soil protection policy should be added to the FDSP to ensure that this most fundamental resource is safeguarded in the course of any potential development of the Forest Estate.</p> <p>Business development policies should be amended to ensure that any enterprise or project promoted or facilitated on FE land conforms to wider FCS social and environmental standards.</p> <p>The Plan should also undertake not to expand forestry onto high grade agricultural land, even where opportunities arise as this is an important strategic resource, particularly in light of potential climate change effects.</p>	<p>The NFESP reaffirms FES commitment to adherence to FC Soil and Water guideline. However, it is acknowledged that soils will require further consideration in future. It is recommended that this approach is extended to non-forestry activities on the Forest Estate.</p>	<p>Policies M&A 3.05 and M&A 4.04 ensure that businesses and community management of the forest estate respectively reflect relevant local and national objectives. While soil protection is not explicitly referenced, it can be reasonably surmised that it will be a relevant consideration in determining whether proposals are acceptable.</p>

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	Detrimental effects on the water and soil environments	Erosion by the sea is a significant issue in coastal forests, particularly where they are planted on dynamic dune sands. Managed retreat approach will inevitably result in loss of soils.	The policy of harvesting trees from coastal areas in advance of losses to the sea – while economically prudent – may leave soils more vulnerable to wind and water erosion. Clarification is required to ensure that forestry practice works <i>with</i> coastal processes, but does not hasten erosion events.		Supporting text for the Environmental Quality policies includes reference to vulnerability of coastal forests on the Moray Firth. References to felling in advance of loss to the sea removed. Policy M&A 6.03 states that the District will adopt ATC (alternatives to clearfell) and Lower Impact Silviculture where practicable to mitigate the effects of erosion
Water and Soil	Detrimental effects on the water and soil environments	Access policies may have a negative impact on soils through increased erosion caused by higher visitor traffic on the path and ride network.	A robust soil protection policy should be added to the FDSP to ensure that this most fundamental resource is safeguarded in the course of any potential development of the Forest Estate. Access and health policies should be amended to promote sustainable and responsible leisure use of woods and forests, and ensure that infrastructure is upgraded to meet visitor needs and limit erosion and runoff.	The NFESP includes a commitment to comply with the Forest Guidelines on water and soil and this level of protection should be extended to other activities on the Forest Estate. The plan also includes a commitment to research the impacts of recreation on the forest environment.	Soil and water policies M&A 6.01 and 6.02 undertake to ensure that forest plans take account of the impact on soils, and that potential impacts will be factored in to the planning of all operations. Design and construction of access infrastructure – although not specifically mentioned – should be included in this. Access promotion will be based around the Scottish Outdoor Access Code which encourages users to take responsibility for the environmental impact of their activities.

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 MAFDSP, or reason for not having taken this into account
Air	Falling air quality	Renewable energy/biomass development could have negative effects through an increase in road transport of forest products to processors and generating stations.	Likely effects depend largely on the location of such developments and their proximity to fuel sources. The plan should therefore promote local processing and use of locally-sourced material, as well as – where possible – more sustainable forms of transport.		Policy M&A 5.07 will promote the development of public transport links to forests
	Falling air quality	Increased public access to the Forest Estate may result in increased private car use.	Leisure and recreation facilities should be prioritised for woods and forests close to major settlements to limit private car use in accessing the resource.		Policy M&A 5.07 will promote the development of public transport links to forests
Landscape	Landscape quality	Renewable energy and Business Development development could have an impact on landscape character and quality	Renewable energy policy should be clarified to emphasise that development on the Forest Estate will be required to minimise landscape impacts. Environmental quality policies should ensure that non-forestry activities, including renewable energy developments, do not have a significant adverse impact on the landscape.	The NFESP undertakes to ensure that potential environmental impacts of renewables schemes are given due consideration when dealing with proposals.	Policy M&A 6.09 specifically requires the consideration of landscape impacts of proposals for windfarm development on the NFE. <i>Landscape impacts will routinely be considered as part of the process of assessing any application for planning permission – particularly where EIA is required – in line with local and national planning policy and legislation.</i> <i>Disposals of land from the NFE are based on the public interest – an important component of which is potential environmental impacts. Similarly, policy M&A 3.10 requires that opportunities for income diversification on the NFE are ‘sensitive’ and do not damage other objectives (such as safeguarding landscape character).</i>

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	Landscape quality	Business development policies could result in negative impacts on landscape due to a lack of environmental protection policies for non-forestry activities	Environmental quality policies should ensure that non-forestry activities, including business developments, do not have a significant adverse impact on the landscape.		Policy M&A 3.10 requires that opportunities for income diversification on the NFE are 'sensitive' and do not damage other objectives (such as safeguarding landscape character).
	Landscape quality	Portfolio analysis policy could have an impact on landscape quality depending on the results of land disposal	Clarification of policy on land disposal to ensure that proposed developments conform to wider FCS social and environmental standards.	The NFESP provides additional guidance regarding the rationale for land disposal and acquisition – e.g. prioritising examples which will contribute to forest habitat networks to meet WIAT objectives	<i>Decisions on land disposal are made in the public interest – environmental protection is therefore an important consideration. Uses that would have significant impact on landscape character would not therefore be considered unless significant public benefits would be generated.</i>
Landscape	Landscape quality	Designations policy only applies to biodiversity sites	Extension of existing policy, or provision of a new policy relating to national and local landscape designations.	The NFESP ensures greater parity between all forms of environmental designation.	Policy M&A 6.06 incorporates greater protection for all landscapes through the forest planning process, making wider use of consultation with landscape advisors.
Historic environment	Potential damage to the fabric and/or setting of cultural heritage sites	Climate change policies may result in increases in woodland planting associated with carbon sequestration which is likely to have an impact on known and unknown elements of the historic environment	Recommend policy cross reference to the FCS Forest Guidelines. The cultural heritage policy should be amended to specify comprehensive archaeological survey in advance of any woodland expansion initiatives.	The NFESP includes a suite of policies which improve protection for cultural heritage sites. This includes more extensive training for field staff, employment of cultural heritage professional and wider consultation	Policy M&A 6.11 undertakes to consider cultural and historical interests during pre-operation site inspection work and to ensure that an archaeologist is available to undertake investigations and provide management advice. It also prioritises further staff training to aid recognition of features.

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 MAFDSP, or reason for not having taken this into account
	Potential damage to the fabric and/or setting of cultural heritage sites	Renewable energy development could have an impact on the historic environment	<p>Renewable energy policy should be clarified to emphasise that development on the Forest Estate will be required to minimise impacts on the historic environment.</p> <p>Environmental quality policies should ensure that non-forestry activities, including renewable energy developments, do not have a significant adverse impact on the historic environment.</p>	<p>The NFESP introduces a commitment to give due regard to the potential environmental effects of renewable energy developments on the Forest Estate. Additional protection is also conveyed to the historic environment through the provisions of the FSP. Minor concerns remain in relation to other non-forestry activities not subject to the planning system.</p>	<p>Policy M&A 6.13 commits FES to continue to work with partners to safeguard and enhance historic environment features – it can be reasonably assumed that this would include partners in renewable energy development on the NFE.</p> <p><i>Impacts on the historic environment are a material consideration in the determination of planning applications. They are routinely dealt with through EIA and mitigation and monitoring conditions.</i></p>
	Potential damage to the fabric and/or setting of cultural heritage sites	Business development and rural diversification could have effects on the historic environment	<p>Clarification of policy to highlight importance of business developments meeting wider FCS social and environmental standards.</p> <p>Environmental quality policies should ensure that non-forestry activities, including business development, do not have a significant adverse impact on the historic environment</p>	<p>Additional protection for the historic environment is conveyed through the NFESP policies. This should result in a greater awareness and sensitivity when allocating sites for non-forestry schemes.</p>	<p>Policy M&A 6.13 commits FES to continue to work with partners to safeguard and enhance historic environment features – it can be reasonably assumed that this would include partners in business development on the NFE.</p> <p>Policy M&A 3.10 requires that opportunities for income diversification on the NFE are ‘sensitive’ and do not damage other objectives (such as safeguarding the historic environment).</p> <p><i>Impacts on the historic environment are a material consideration in the determination of planning applications. They are routinely dealt with through EIA and mitigation and monitoring conditions.</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 MAFDSP, or reason for not having taken this into account
	Potential damage to the fabric and/or setting of cultural heritage sites	Access and health policies could result in an increase in damage to historic sites as a consequence of increased levels of recreation activity in forests	<p>The plan should note the objective of steering recreation activity to those areas which are at least risk of damage from recreation. FCS should work with HS and Access Authority to ensure that access developments minimise impacts on the historic environment.</p> <p>Environmental quality policies should ensure that non-forestry activities, including access promotion and management, do not have a significant adverse impact on the historic environment.</p>	The NFESP undertakes to conduct research into the impacts of access and recreation on the environments of the Forest Estate.	Access policies outline an approach based on the Scottish Outdoor Access Code, which prioritises users taking responsibility for the impact of their activities. While the policy framework does not specifically deal with the potential for access and recreation to impact on the historic environment, FES
	Potential damage to the fabric and/or setting of cultural heritage sites	New woodland, flood and catchment management, habitat networks and hardwood timber policies may conflict with historic environment objective by expanding woodland cover into previously un-forested areas.	<p>Any large scale planting initiative will inevitably present some level of conflict with archaeological sites. (Compliance with the 'Forests and Archaeology' guidelines is assumed).</p> <p>The cultural heritage policy should require full, professional, archaeological survey during the planning stage of any forest expansion. This will facilitate proper protection and incorporation into forest design.</p> <p>Policies should be expanded to state that no planting will be considered where there is likely to be significant negative impacts on archaeological sites, monuments or their setting. The preservation of coherent historic landscapes should also be prioritised.</p>	The NFESP includes a suite of policies to conserve, manage and interpret the historic environment.	Policy M&A 6.11 states that FES will ensure that cultural heritage impacts are considered during planning of operations and that suitable provision will be made for archaeological investigations and for advice in managing assets.

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 MAFDSP, or reason for not having taken this into account
	Potential damage to the fabric and/or setting of cultural heritage sites	Biodiversity policies , including the regeneration of native woodland could result in impacts on the historic environment.	The cultural heritage policy should be amended to specify comprehensive archaeological survey in advance of any woodland expansion initiatives.	The NFESP introduces a suite of heritage protection policies, which include a recognition of the need to seek professional assistance to ensure effective safeguarding of cultural heritage sites.	<p>Policy M&A 6.11 states that archaeological advice will be sought in relation to the management of cultural heritage features – this will include managing regeneration to protect sensitive assets.</p> <p>Policy M&A 6.13 states that FES will work with partners to safeguard and enhance/interpret features of interest – this should include balancing the needs of cultural heritage features with wider biodiversity objectives.</p>
	Potential damage to the fabric and/or setting of cultural heritage sites	Designations policy only applies to biodiversity sites	Extension of existing policy, or provision of a new policy relating to international, national and local historic environment designations.	The NFESP redresses the balance, and gives equal credence to all environmental designations.	<p>Policy M&A 6.10 commits FES to maintaining all scheduled monuments in accordance with agreed management plans – therefore ensuring a sustainable future for nationally significant assets.</p> <p>The supporting text for the cultural heritage policies acknowledges the importance of undesignated assets and highlights the fact that the District has highlighted a number of undesignated sites for active management and interpretation.</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 MAFDSP, or reason for not having taken this into account
	Potential damage to the fabric and/or setting of cultural heritage sites	The cultural heritage policy lacks explicit references to methodologies for the protection and enhancement of cultural heritage sites.	<p>The policy should be revised to require full, professional, archaeological survey in advance of any significant forest operations (e.g. large-scale ground preparation, planting or harvesting schemes) and highlight the importance of the 'Forests and Archaeology guidelines' in forest practice.</p> <p>It would be advisable to develop a strategy for managing the unscheduled monuments on the Forest Estate, in addition to the existing SAM management plans.</p> <p>Opportunities for interpretation and access to sites of interest should be explored to improve the awareness and understanding of woodland cultural heritage.</p>	The NFESP includes a suite of policies to conserve, manage and interpret the historic environment.	Policy M&A 6.13 undertakes to work in partnership to safeguard and, where possible, enhance or interpret features of cultural or historic interest

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 Drafts of the Moray and Aberdeenshire FDSPs (Table 7.2). In Table 7.1, where relevant, the issues raised in the SEA of the National Forest Estate Strategic Plan and the SEAs of other forest district strategic plans have also been included.

TABLE 7.1 –LISTS CONSULTATION AUTHORITY RESPONSES AND SETS OUT HOW THEY HAVE BEEN TAKEN INTO ACCOUNT

CONSULTEE / RESPONDENT (ALPHA ORDER BEGINNING WITH THE CONSULTATION AUTHORITIES)	SUMMARY OF COMMENTS	HOW THE COMMENT WAS TAKEN INTO ACCOUNT IN MAKING THE DECISION TO ADOPT THE FINAL PPS
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	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.	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>
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		
SNH comments on National Forest Estate Strategic Plan which are also relevant to Moray and Aberdeenshire Forest District	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	FDSP Changes 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>Response to comment which states that there is only limited commitment to community development within the FDSP (expands on the community development theme):</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>Within the FDSP</p> <p>Significant expansion of explicit policy coverage in relation to Community Development theme – although no specific reference to potential impacts on natural heritage.</p> <p>It should be noted that any development proposals on the National Forest Estate would require planning permission and would, as such, be required to take potential environmental effects into consideration (including through EIA where necessary). Similarly, decisions to dispose of land through the NFLS are taken on a public interest basis – with potential environmental impacts being an important component.</p>

CONSULTEE / RESPONDENT (ALPHA ORDER BEGINNING WITH THE CONSULTATION AUTHORITIES)	SUMMARY OF COMMENTS	HOW THE COMMENT WAS TAKEN INTO ACCOUNT IN MAKING THE DECISION TO ADOPT THE FINAL PPS
	Access and Health: Should include a commitment to safeguard paths where possible	National strategic plan commits to protecting public rights of way in forest design and management planning
	Environment Quality: Plan should refer to the role of forestry in acid deposition	Policy 6.02 undertakes to minimise the risks of acidification during forest operations
	Environmental Quality: Cultural heritage section focuses on built heritage, but should also include references to 'living cultural heritage' e.g. veteran trees, anthropogenic vegetation patterns (e.g. wood pasture, coppice) relating to ancient patterns of woodland and landscape management	Recently published FCS Policy ' <i>Scotland's Woodlands and the Historic Environment</i> ' provides comprehensive coverage of built and natural elements of the historic environment Policy IRS 6.09 contains a specific reference to 'living heritage' in the context of the historic environment

Changes to the Moray and Aberdeenshire Forest District Strategic Plan arising from wider consultation

Table 7.2 below summarises the most substantive comments received on the draft Moray and Aberdeenshire Forest District Strategic Plans 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 MAFDSP AND FES RESPONSE

Consultation Comment	Response	Amendment made to the Plan?
General		
It is important that the District Plan is delivered in partnership with Community Planning Partners at the local level... The range of measures proposed reflect and support many of the key activities that Moray Council and partners are progressing from Climate Change and Carbon Management Plans, through to a range of measures to support the Moray 2020 study prepared by HIE Moray to diversify and strengthen the local economy. This study sets out a range of objectives, many of them supported by the aims of the Moray Forest District Strategic Plan. Delivery of the Moray 2020 strategy depends upon partnership working	The reflection of partnership working more generally and specifically with Moray Council is reflected in Section 3. The shared agenda with Moray Council and other partners in terms of Moray 20:20 is also included in specific references to Business Development: Community Development and Access & Health.	No
The Council understands that the Forest Enterprise organisational structure is currently under review and this does not seem to be reflected in the Plans. The successful delivery of the Scottish Forestry Strategy will depend upon the local delivery of the priorities set out in the Strategic Plans. Local staff with local knowledge and most importantly, local contacts and partnership will be the key to delivery of national objectives. The Moray Community Planning Partners and Moray Community benefit from the enthusiastic work of Moray Forest District staff on a	The issue of structural review should not make any difference to the delivery of Strategic Plans. It is not reflected in the draft version as the outcomes of the review process were not known at the time of consultation. It is however appropriate for us to incorporate a specific	Changes to District structure reflected in Section 1 of the finalised Plan.

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wide range of initiatives which are reflected in the Moray Forest District Strategic Plan. There appears to be little consideration of the review and potential impacts upon the Strategic Plans and this should be addressed	reference to the decision to merge the plans in our preamble	
P10 Bennachie is a “distinctive ancient volcano”? This is a major error... Bennachie is a granite intrusion, not a basaltic volcanic remnant. The type of forestry would be very different	There is no disagreement as to the fact that the underlying material is granite. The reference relates to how the granite intrusion arose. Our information is clear that this was as a result of volcanic activity. In strategic terms it is not significant	[Bennachie is a component of the Eastern Highlands batholith – BGS 1991] Reference corrected in introductory ‘About Moray & Aberdeenshire FD’ section.
Climate change		
the plan makes no mention of things like the Grampian Forest Network based on BEETLE, the NE Climate Change Partnership or the Rural Aberdeenshire LEADER Programme – although to be fair, the Strategy may have been drafted before these became well known	Specific references to Forest Habitat Networks included. FD staff unaware of the NE Climate Change Partnership at the time of drafting	Introductory text to the Climate Change section states that the FD will contribute to the NE Climate Change Partnership. LEADER programme is referenced in the introduction to the Business Development section.
We are disappointed that there seems to be very limited opportunity for the use of forest residues for bio fuel projects. Brash mats can be harvested for this purpose and are in some other areas.	Recurring theme which we need to address and can accommodate all of these submissions with the introduction of a clear statement which encapsulates (1) the suitability of NE Scotland in energy terms (2) the need to take account of environmental and landscape issues (3) the need for a robust consultation approach (4) reinforce the application of Governmental objectives and adherence to the planning policy	Reference to potential for residue recovery for energy uses ‘wherever possible’ included in introduction to the ‘Timber’ section and in the general introduction – with the caveat that much of the brash currently generated is required to enable machines to operate effectively and to reduce their ecological impact.
Timber		
One issue, which doesn’t appear to be addressed and causes concern locally, is the road infrastructure to support the forestry industry. There is little mention in either the Framework Strategic Plan or Moray Forest District Plan of the need to strengthen classified and unclassified roads to allow harvesting to proceed. This should form a fundamental part of the plan to avoid damaging the public road network. Suggest additional wording is included in both Plans “Many of the minor public roads have no foundations and are not able to accommodate sustained use by HGV’s Where “C” and unclassified roads have not been strengthened, haulage of timber along them must be restricted to 1,000 tonnes per 12-month period to avoid damaging them. The list of strengthened routes is available via the Forestry	Established practice within the unit is consistent with the approach currently adopted. The respondent may not have registered that this is the Forest Enterprise Scotland local management plan rather than a more generic plan which may include both public and private sectors. The issue is already covered under Section 2 The level of detail proposed is not appropriate for a strategic plan.	Policy M&A 2.03 commits FES to taking an active role in the Grampian Timber Transport Group to reduce the impact of timber transport

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Commission. Where routes have not been strengthened, and harvesting in excess of 1,000 tonnes is proposed, consultation with Moray Council's Roads Service is essential to allow the route to be assessed and consent considered"		
<p>P32 We are not clear about the meaning of the bottom right hand comment. Why is a target not SMART and what other targets are jeopardised? Surely replanting as soon as is practicable is desirable for landscape and production reasons</p> <p><i>[refers to assessment of previous Strategic Plan – Kincardine FDSP 1999-2006]</i></p>	<p>Target is not SMART as reference is simply to restock as soon as practicable rather than setting a measurable parameter. The targets which are jeopardised are various but include application of fallow policy, chemical reduction strategy and potential to use natural regeneration for restocking.</p> <p>It is clear that replanting as soon as practicable is no longer the preferred option with generic application of the fallow policy. There is specific reference to stocking densities in Section 5</p>	<p>Covered by a specific reference to the FD's fallow ground policy in FDSP policy M&A 6.02</p>
<p>More specific actions to clarify development of new markets for quality hardwoods, as described in the Scottish Forestry Strategy (2006 (SFS), would be appreciated.</p>	<p>Implementation of survey to identify and quantify existing hardwood resource</p> <p>Development of management prescriptions for hardwood resource</p> <p>Niche marketing of hardwood resource in accordance with agreed prescriptions and consistent with Forest Plans</p>	<p>Policy M&A 2.07 undertakes to develop FES marketing of hardwood products to optimise the existing resource.</p> <p><i>Detailed actions perhaps inappropriate for level of Plan – actions outline in the SFS will also be implemented, therefore no need to replicate</i></p>
Business Development		
Community Development		
<p>In some aspects the plan's content is a little dated – for example it suggests that social deprivation being confined to part of Aberdeen City but doesn't seem to recognise that social exclusion, is an issue and that it can be very significant in rural areas, especially for older and disabled people, especially where public transport is limited or non-existent. One of the forestry events that was organised several years ago surprised people by its success – probably largely due to the fact that buses were laid on from Aberdeen to the site of events – Tyrebagger Forest just outside Aberdeen.</p>	<p>The first point should be encompassed by the adoption of EQIA but the difficulty of accessing the forests is recognised.</p>	<p>Explicitly dealt with in Policy M&A 5.08, which recognises the potentially widespread nature of social exclusion</p>
Access and Health		
<p>[Plan]...should state that areas will be left unmarked, unsigned and wild for those who do not want waymarked tracks</p>	<p>This point is entirely valid. The scale of the merged district is such that there will remain large areas of unwaymarked forest appropriate for use by those</p>	<p>Statement added to introduction to Access and Health section: <i>'In striking a balance, we also recognise that some user groups</i></p>

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	<p>with the necessary skills and confidence to do so. It is recognised that this is an experience valued by some user groups.</p> <p>This is fundamentally a matter for the District Recreation Strategy, however FES are supportive of a comment to this effect in the Strategic Plan</p>	<p><i>prefer a wild land experience, and we will develop and use a district recreation strategy to match facility provision to user group needs'</i></p>
Environmental Quality		
<p>P9 Knowing much of the FC estate it is difficult to believe that figure 2 represents the area - eg 19% brown earths. Is figure 2 the breakdown for all of Aberdeenshire rather than the land managed by the FC? If so Figure 2 has no relevance. If it is the land managed then the chart begs some questions!</p>	<p>The chart is relevant to the land within Aberdeenshire and Aberdeen City and does not relate solely to the land managed by Forest Enterprise. This is a recurring issue in that the generic term "District" is at times used to describe the land managed by FES and at other times to wider context within which our management sits. In reviewing the text we need to ensure that references are both consistent and clear</p>	<p>Picked up in editing of finalised Plan</p>
Biodiversity		
<ol style="list-style-type: none"> Under the biodiversity section on page 10 in the 'western uplands zone' The River Spey Special Area of Conservation (SAC) is referenced. It is incorrectly named (it's missing the 'River', and it states that river lamprey are one of the notified/qualifying interests – this is incorrect – it should be 'sea lamprey' not 'river lamprey'. Page 48 – 'invasive exotics' the plan notes just a few species here (rhodi and hemlock). I would imagine that there will be some forest areas with non-woody invasives in forests near watercourses. Parts of the Spey have Japanese knotweed, Himalayan balsam and giant hogweed that may extend to forested areas adjacent to the rivers. Also there is no mention of mink control that could help to benefit the very few water vole that may still persist in some areas in Moray 	<p>This is correct and requires to be amended</p>	<p>The SAC is not specifically referenced in the revised plan due to an overall reduction in detail to create a more succinct document – however the significance and protection of designated assets are prioritised in the Plan.</p>
<ol style="list-style-type: none"> p11, para 2 – is there a reason for using SAC as an abbreviation for Species Action Plans? Confuses with Special Area of Conservation (introduced on P8) p11, para 4 – it would be helpful in a strategic plan if FES explained here (briefly) what criteria they used for allocating sites to the 3 PAWS categories, as an important piece of context 	<ol style="list-style-type: none"> This is simply a typo: it should read Species Action Plans (SAPs) not SAC The information requested is incorporated and referenced in the District PAWs Plan – the principle of including a brief explanation is accepted but may be a cost of reducing the overall scale of the plans. 	<ol style="list-style-type: none"> Corrected No change

Consultation Comment	Response	Amendment made to the Plan?
<p>3. p16, bullets 1&5 – the level of use may even be an underestimate (bullet 1), but when taken in context with bullet 5, I think the strategy does not make a distinction between its use of the term social deprivation (which seems to be based on wealth) and social exclusion, which can be based on other factors, such as age, disability, availability of public transport etc and is consequently as prevalent in rural areas as it is in cities or large towns. In that respect I think there is a need to think about making recreational provision as widespread as possible throughout the Forest District. The soon to be launched Rural Aberdeenshire Leader programme, with its joint themes of Revitalising Communities and Progressive Rural Economy provide an excellent opportunity for FES to expand such provision through community partnerships across the Forest District</p>	<p>3. The specific terms of reference for development of Strategic Plans used the data set based on indicators of multiple social deprivation. Whilst not linked directly to weath there is a clear correlation. The Governmental agenda for Scotland is based on slightly different terminology but there is no question that Scocial Inclusion should be an overt component of the plan</p>	<p>3. Numerous references to social inclusion within finalised plan, including Policy M&A 5.08</p>
<p>4. p17 – these groups are confusing - what’s the difference between Conservation and Wildlife and why is SNH in with Historic Scotland? Fewer categories may encourage people to think about similarities rather than differences</p>	<p>4. Agree with the sentiment expressed regarding differences. This table has no strategic relevance and can be removed</p>	<p>4. Table removed</p>
<p>5. P45, line 2 – should include mention of the Rural Aberdeenshire LEADER Programme (due to launch in June 2008)</p>	<p>5. References to be included</p>	<p>5. Reference to LEADER programme in introduction to ‘Business Development’ section</p>

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

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

- The ‘do-nothing’ option of continued implementation of the 2000 Forest District Strategic Plans. This option would not reflect the new SFS and progress that had been made since this time on certain key issues;
- Direct implementation of the Scottish Forestry Strategy at a District level. This option would not reflect local key issues and opportunities;
- Pursuing only one of the seven Scottish Forestry Strategy themes as a policy priority (e.g. implementing only climate change policies to the exclusion of all other objectives). This option would result in an imbalanced policy approach.

These alternative approaches highlighted the importance of balance in the Strategic Plan, as the effects of prioritising one policy area generally produced less positive results than a more rounded plan. Similarly, the 2007 plans for Moray and Aberdeenshire demonstrated significant progress over the 2000 versions and presented a more realistic and pragmatic solution than the local application of the Scottish Forestry Strategy. The MAFDSP 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 Moray and Aberdeenshire 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.