

POST-ADOPTION SEA STATEMENT – COVER NOTE

PART 1

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

or

SEA Gateway
Area 1 H (Bridge)
Victoria Quay
Edinburgh EH6 6QQ

PART 2

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

Tay Forest District Strategic Plan 2009-2013

The Responsible Authority is:

The Forestry Commission Scotland (FCS)

PART 3


Contact name Nicol Sinclair

Job Title Planning Manager

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Signature & date  24th May 2010

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1. BACKGROUND

Post-adoption SEA statement for:

Tay 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	Tay Forest District Strategic Plan 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 Tay Forest District Strategic Plan (TFDSP) 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 Tay Forest District (this includes Perth and Kinross, Angus and North Fife).
Summary of nature/content of PPS	The Tay Forest District 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 Tay 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 TAY DISTRICT STRATEGIC PLAN AND HOW THE ENVIRONMENTAL REPORT HAS BEEN TAKEN INTO ACCOUNT

Forest District Strategic Plans sit within a wider policy framework which includes the Scottish Forestry Strategy, the National Forest Estate Strategic Plan and Forestry Commission guidelines and policies. The TFDSP 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 Tay Forest District Strategic Plan took into account this wider framework however several environmental issues were highlighted particularly in relation to non-forestry activities and land disposal and acquisition. As a result it was recommended that wherever practical further safeguards should be reflected in modifications to the FDSP prior to final adoption. Table 6.1 below sets out the key findings raised in the Environmental Report and explains whether they are addressed adequately within the National Forest Estate Strategic Plan (which has also been subject to SEA) or other Forest Enterprise policies and where any additional amendments were made to the TFDSP to ensure a robust approach to the avoidance of negative environmental impacts.

TABLE 6.1

SEA issue	Existing problem?	Impact of Tay 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 TFDSP 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.	Species choice policy	Species choice policy could be enhanced by cross referencing to biodiversity policies to ensure that priority species and habitats are reflected in planning decisions. This represents an opportunity to strengthen the plan.		The species choice policy was amended to include reference to the utilisation of the ‘Ecological Site Classification system to ensure the planting of resilient species on suitable sites..’
Biodiversity	Overall decline in biodiversity, sensitivity of international, national and locally important nature sites. Potential impacts of climate change.	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.	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. Environmental quality policies should ensure that non-forestry activities, including access promotion and management, do not have a significant adverse impact on biodiversity.	National Forest Estate Strategic Plan includes commitment to carry out research into the environmental impacts of recreation on the forest estate.	National Forest Estate Strategic Plan covers this issue.

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Biodiversity	Overall decline in biodiversity, sensitivity of international, national and locally important nature sites.	<p>Biodiversity policy theme.</p> <p>Requirement to ensure that the Strategic Plan, and lower tier PPS do not affect the integrity of internationally important biodiversity sites.</p>	The Strategy should be clarified to make explicit reference to the requirement to protect the integrity of internationally important biodiversity sites and to require that potential effects on such sites are considered at Forest Design Plan and project levels. This should help ensure that the Strategic Plan reflects the provisions of ‘The Conservation (Natural Habitats, &c.) Amendment (No. 2) (Scotland) Regulations 2007’.	<i>The National Forest Estate Strategic Plan includes a requirement to conduct Appropriate Assessment to ensure that activities do not affect the integrity of Natura 2000 sites.</i>	An additional policy was added to the Biodiversity theme which states that the potential impact of management proposals on NATURA sites will be taken into account using the appropriate assessment process.
Population and human health		Land disposal and subsequent development as a result of the Portfolio analysis policy is likely to have an impact on people’s quality of life.	Clarification of policy on land disposal	The National Forest Estate Strategic Plan provides some clarification on land disposal and acquisition, for example by prioritising examples which will contribute to forest habitat networks, or meet WIAT objectives.	<p>FES decides whether or not to sell land based on the public benefit which is scored around social and environmental considerations. This is the basis of many planning decisions and would also be addressed under the local authorities planning procedures.</p> <p>Methodology for disposal – FES will make it clearer how it intends to notify stakeholders of the intention to sell woodlands and criteria for making such a decision.</p>

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Population and human health		Business development and rural diversification could have 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.	<i>The National Forest Estate Strategic Plan provides assurance that environmental issues will be taken into account in relation to renewable energy projects.</i>	Text amended to state that 'We will be open to new business ideas that match our wider social and environmental standards'.
Water and soil	Loss and damage to soils	Business development policies Absence of a strong soil protection policy, and a lack of environmental protection policies for non-forestry activities means there is potential for impacts on soil.	Inclusion of a robust soil protection policy under the Environmental Quality theme, applicable to forestry and non-forestry activities.	<i>The National Forest Estate Strategic Plan states a requirement to comply with Forestry Commission Soil and Water Guidelines.</i>	Text amended under the Environmental Quality theme to include the EU Framework Directive on soil.
Landscape	Quality of the landscape	Renewable energy 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	<i>The National Forest Estate Strategic Plan provides assurance that environmental issues will be taken into account in relation to renewable energy projects. This refers to the use of best practice and building on wide experience of working in sensitive locations.</i>	Renewable energy policy under the Climate Change theme has been amended to include the consideration of 'community, planning and environmental concerns' in maximising the potential for wind farms on the national forest estate.

SEA issue	Existing problem?	Impact of Tay 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 TFDSP or reason for not having taken this into account
Landscape	Quality of the landscape	A lack of environmental protection policies for non-forestry activities means there is potential for impacts on landscape as a result of Business development policies .	Environmental quality policies should ensure that non-forestry activities, including business developments, do not have a significant adverse impact on the landscape.		Text amended under the Business Development theme to state that business developments and new business ideas will be encouraged where they 'match our wider social and environmental standards'.
Landscape	Quality of the landscape	Land disposal and subsequent development as a result of Portfolio analysis policy has potential to impact on landscape quality.	Clarification of policy on land disposal.	<i>The National Forest Estate Strategic Plan provides some clarification on land disposal and acquisition, for example by prioritising examples which will contribute to forest habitat networks, or meet WIAT objectives.</i>	FES decides whether or not to sell land based on the public benefit which is scored around social and environmental considerations. This is the basis of many planning decisions and would also be addressed under the local authorities planning procedures. Methodology for disposal – FES will make it clearer how it intends to notify stakeholders of the intention to sell woodlands and criteria for making such a decision.
Landscape	Quality of the landscape	Designations policy only applies to biodiversity sites	Extension of existing policy, or provision of a new policy relating to national and local landscape designations.	<i>The National Forest Estate Strategic Plan includes a policy referring to National Parks, National Scenic Areas and tourist routes</i>	National Forest Estate Strategic Plan covers this issue.

SEA issue	Existing problem?	Impact of Tay 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 TFDSP or reason for not having taken this into account
Historic environment	Past loss or decline of nationally and locally important historic sites	Increases in woodland planting associated with carbon sequestration as a result of Climate change policies could potentially have an impact on known and unknown elements of the historic environment.	<p>Recommend policy cross reference to the FCS Forest Guidelines.</p> <p>The cultural heritage policy should be amended to specify comprehensive archaeological survey in advance of any woodland expansion initiatives.</p>	<i>The National Forest Estate Strategic Plan includes a suite of policies which address these concerns particularly Scotland's woodland and the historic environment policy.</i>	Amendment of cultural heritage policy under the Environmental Quality theme to include 'that cultural heritage issues are adequately addressed in any proposed developments (including acquisition of bare land)'.
Historic environment	Past loss or decline of nationally and locally important historic 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>	<i>The National Forest Estate Strategic Plan provides assurance that environmental issues will be taken into account in relation to renewable energy projects. This refers to the use of best practice and building on wide experience of working in sensitive locations.</i>	Renewable energy policy under the Climate Change theme has been amended to include the consideration of 'community, planning and environmental concerns' in maximising the potential for wind farms on the national forest estate.

SEA issue	Existing problem?	Impact of Tay 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 TFDSP or reason for not having taken this into account
Historic environment	Past loss or decline of nationally and locally important historic sites	Business development and rural diversification could have effects on the historic environment	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 the historic environment	<i>The National Forest Estate Strategic Plan includes a suite of policies which address these concerns</i>	Text amended under the Business Development theme to state that business developments and new business ideas will be encouraged where they 'match our wider social and environmental standards'
Historic environment	Past loss or decline of nationally and locally important historic 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.	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. 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.	<i>The National Forest Estate Strategic Plan includes a suite of policies which address these concerns</i>	National Forest Estate Strategic Plan covers this issue.
Historic environment	Past loss or decline of nationally and locally important historic 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.	<i>The National Forest Estate Strategic Plan includes a suite of policies which address these concerns</i>	Amendment of cultural heritage policy under the Environmental Quality theme to include 'that cultural heritage issues are adequately addressed in any proposed developments (including acquisition of bare land)'

SEA issue	Existing problem?	Impact of Tay 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 TFDSP or reason for not having taken this into account
Historic environment	Past loss or decline of nationally and locally important historic 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.	<i>The National Forest Estate Strategic Plan includes a suite of policies which address these concerns</i>	National Forest Estate Strategic Plan covers this issue.

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 TFDSP (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	Improved text on the Water Framework Directive and River Basin Management Plans.
	Inclusion of a soil protection policy is vital (as per ER recommendations), as stipulating adherence to Soils and Water guidelines is insufficient mitigation.	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. Note also that the guidelines are being revised to develop a more updated series.
The Scottish Ministers (Historic Scotland)	No comments specifically on the TFDSP.	
Scottish Natural Heritage		
ER Comment: CLIMATE CHANGE THEME	Flood and catchment management policy – question the positive effect on biodiversity – not always the case: update assessment table accordingly Special care required to ensure no – ve impacts through catchment management/hydrological change	New commitment under Flood and Catchment Management to ‘ <i>Comply with the Forests and Water Guidelines in a competent and effective manner</i> ’.

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
ER comment: COMMUNITY DEVELOPMENT THEME	The scope of the policy area should be more explicitly defined to help assess effects (particularly on natural heritage)	<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>
ER comment : ACCESS AND HEALTH THEME	Suggest that there is the potential for negative impacts on landscape quality as a result of the enhancement of visitor facilities	New text under 'Recreation' to ensure that forest operations will be adapted to manage impacts on the visual amenity.

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
ER comment: ACCESS AND HEALTH THEME	Potential negative effects on biodiversity from the creation of new woodland, dependent on the habitat being converted – recommend biodiversity assessment as mitigation (can also apply to water, soil and landscape objectives)	<p>New Woodland policy removed from Access and Health section – WIAT policy added to Community Development section – no mention of biodiversity assessment in relation to the creation of new woodland.</p> <p>The need for an improved biodiversity strategy and implementation plan is noted and is in draft.</p> <p>The recently published FCS publication “<u>Woods for Nature – Our Biodiversity Programme 2008-2011</u>” along with the <u>FCS Species Action Notes</u> (“Action for black grouse”, “Action for capercaillie” & “Action for red squirrel”) provides strategic direction on biodiversity for state and public sector woodlands. These contain commitments for the national forest estate. Page 17: ‘<i>We will promote biodiversity planning according to published best practice in all types of new planting schemes, both on the national forest estate and in private woods supported by measures under the SRDP.</i>’</p>
Comment on the TAY ER AND THE FDSP: BIODIVERSITY THEME	<p>Plans and ERs should note that Annex 4 species and all birds are given some protection – recommend specific reference to European Protected Species</p> <p>Reference should be made to the Scottish Biodiversity List, as described in Section 2(4) of the Nature Conservation (Scotland) Act 2004, and to the statutory duty on all public bodies to further the conservation of biodiversity;</p>	<p>No change to TFDSP with the exception of additional policy was added to the Biodiversity theme which states that the potential impact of management proposals on NATURA sites will be taken into account using the appropriate assessment process.</p> <p><i>The National Forest Estate Strategic Plan includes a requirement to conduct Appropriate Assessment to ensure that activities do not affect the integrity of Natura 2000 sites.</i></p> <p>FCS Woods for Nature Publication (2008) aims to halt the loss of biodiversity and notes the duty under the Nature Conservation (Scotland) Act 2004 to further the conservation of biodiversity and contribute to the Scottish Biodiversity Strategy.</p> <p>FCS has also produced notes on European Protected Species (Capercaillie, Black Grouse, Pearl Bordered Fritillary, Juniper, Red Squirrel, Chequered Skipper butterfly).</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
ER comment: BIODIVERSITY THEME	Appropriate Assessment of the likely significant effects of the plan on Natura 2000 sites is required.	<p>The following was inserted into the TFDSP after discussion with SNH to avert the need for AA: "We recognise the potential impact of harvesting operations on SAC sites throughout the District, particularly the extensive River Tay and South Esk SAC's. In most cases adherence to Forest and Water Guidelines will provide the necessary safeguards but, in certain locations, where the potential risk and impact of sediment loading is high then further measures may be required. These will be identified during the consultation process with SNH over forest design plans and any agreed principles will be applied during the planning and implementation of individual operational sites."</p> <p>In addition a new policy was inserted into the Biodiversity theme regarding using the Appropriate Assessment process to avoid impacts on Natura sites.</p>
SNH comments on National Forest Estate Strategic Plan which are also relevant to Tay Forest District		Tay FDSP Changes
	Recognise the role of soils as carbon stores	Tay plan changes: Inclusion of the carbon storage function of soils under Theme 6 Environmental Quality
	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.

Changes to the Tay Forest District Strategic Plan arising from wider consultation

Table 7.2 below summarises the most substantive comments received on the draft Tay Forest District Strategic Plan and sets out how they were taken into account in finalising the Plan. Individual responses can be viewed, on request, at the address shown in Section 3 of this Post Adoption Statement.

TABLE 7.2 SUBSTANTIVE COMMENTS ON THE DRAFT TFDSP AND FES RESPONSE

Consultation Comment	Response	Amendment made to the Plan?
General		
We welcome and support the Consultative Tay Forest District Plan's consideration of key natural heritage issues, and their mainstreaming within the Plan. The Plan is clear and well structured, and makes good connections from the forest resource and beyond e.g. to communities and businesses.	Comments noted and last point agreed.	None.

Consultation Comment	Response	Amendment made to the Plan?
There is scope to strengthen the inter-relationships between the various key themes, and given there is no prioritisation between the themes.		
We welcome the identification of priority issues for the Tay Forest District, such as biodiversity, water quality and catchment management, landscape quality, community engagement and access and health. It is important to consider the relationships between the priority issues. We are supportive of the integrated approach to forestry and the environment such as consideration of community needs, local non wood-based businesses and wider impacts of work within the forest e.g. on water quality.	Comments noted.	Text amended accordingly.
Climate change		
Supply of wood pellets for burners.	We are committed to supplying woodfuel into the supply chain but not direct to consumers. We would expect entrepreneurs to develop opportunities such as this.	None.
Renewables and business development: we support the renewable and business development proposals in the Plan but seek appropriate cognisance of natural heritage issues and the criteria used.	Points noted.	Text amended in biodiversity section.
We suggest more emphasis on energy conservation and sustainable management practice.	Noted.	None.
We agree with the recognition of the contribution riparian woodland can make to flood management. There is a key role to be played by large woody debris i.e. appropriately located log jams in flood mitigation. While these are supplementary to a broader catchment scale management, they can have more immediate effect and can be created deliberately as engineered log jams.	Work underway to trial methods for slowing down water flow e.g. partnership project with WWF in Glen Devon. This should then feed through into Forest & Water Guidelines which will then be become normal practice.	Section on District priorities amended to try and take account of comment. However, worth noting that priorities on social, environmental and economic issues are also addressed within Forest Plans following stakeholder consultation.
New woodland: expansion of woodland in lowland areas is generally welcomed but proper evaluation of the natural heritage value of the current habitat proposed for woodland is required along with planting new woodland which is appropriate to the area.	Agreed, but will be covered in the EIA determination and stakeholder consultation for any new woodlands.	Section on District priorities amended to take account of comment. Also worth noting that priorities on social, environmental and economic issues are also addressed within Forest Plans following stakeholder consultation.
Consider inclusion of the contribution of new planting to climate change in this section.	Agreed.	None.
There is potential for energy from forest residues although we welcome the identification of wood-fuel.	Agreed, and brash baling trials are underway within the District. However, this cannot be applied on all sites and we are still feeling our way on this issue.	Text amended accordingly.

Consultation Comment	Response	Amendment made to the Plan?
Species choice: species choice should also take biodiversity into consideration as it does not always follow that the resilient species for climate change offer the best biodiversity benefits.	Agreed.	Text amended accordingly.
Flood and catchment management: forestry should be seen as a key part of the solution in this area. There are flood attenuation benefits from more naturalised riparian woods in particular through the action of large woody debris. Their natural scarcity results in them having significant biodiversity benefits in providing habitats for invertebrates.	Work underway to trial methods for slowing down water flow e.g. partnership project with WWF in Glen Devon. This should then feed through into Forest & Water Guidelines to become standard practice. Forest Plans also include proposals for riparian woodlands.	Text amended accordingly.
Monitoring: investigating links between flood events and forest condition and operations could be a major research project.	Agree, but more a national issue than District level.	None.
Renewable energy: we suggest the statement of support for all appropriate renewable energy projects is expanded to include the need for consideration of projects in relation to natural heritage sensitivities (e.g. landscape and biodiversity). It is not clear how the best small scale wind farm and hydro schemes will be identified or taken forward, given the process of determination through the planning system.	The first point is covered by the planning process which will quickly rule out any schemes with insurmountable natural heritage issues. Agree that second point needs further elaboration.	None.
Timber		
Timber supply and quality: there are hidden environmental benefits in improving and maintaining the quality of both the growing stock and its silviculture in the District Forest Estate inasmuch as there is potential to produce the same volume from less area and improved quality improves opportunities for carbon sequestration in long lived timber products. We suggest cross referencing to the need to consider biodiversity and landscape requirements in new planting, and also cognisance of the need for staff and contractual skills to ensure thinning and clearance works are undertaken using appropriate methods /timing of works.	Revised structure of final version should resolve the issues over cross-referencing.	Text amended accordingly.
Develop the hardwood sector – we support this element, but suggest that the extraction of existing timber is caveated to avoid felling of inappropriate/notable trees.	Noted – caveat covered by normal practice through our work planning process.	Text amended accordingly.
Timber transport: the commitment to a reduction in road miles while maintaining output is supported.	Noted.	None.
Business Development		
Support for local businesses: the identification of in-forest recreational business is welcome assisting with one of SNH themes.	Noted.	None.
Agree with the need to contribute to rural development and develop tourism potential and suggest these are caveated to appropriate areas.	Noted – caveat will be covered by planning process and stakeholder consultation.	None.

Consultation Comment	Response	Amendment made to the Plan?
We welcome the portfolio analysis of the forest resource, but consider this a broad based approach. For example, impacts on priority species will need to be assessed on a case by case basis.	Agreed and covered in the text on the next stage before sale is agreed.	None.
Portfolio analysis: we refer to our comments above under Section 4 with regard to forests with low scores. It is possible that economically low scoring forests may still support a particular priority species for example and will need to be assessed on a case by case basis. We suggest a similar response is inserted in the Plan for forests which score well on non-market criteria and the pro-active consideration of their enhancement.	Agreed and covered in the text on the next stage before sale is agreed.	None.
Staff and contractor skills: we welcome the inclusion of this section and consider this applies to across the board re. The key themes.	Noted.	None.
Community Development		
Development in forests – houses on edge of forests compared with abroad, there aren't any where as it is a way of life overseas, is this being considered?	Current planning guidance and registered social landlord priorities mean that this does not appear to be a high priority for the area. However, we are happy to keep this under review.	Text altered in community development key theme.
People's relationship with the forest: expansion of the recreational importance of the District area would be helpful including reference to the Scottish Outdoor Access Code (SOAC) and key areas/routes.	Agreed.	None.
Community engagement: we support this issue but recommend caveating this to encourage communities to become more involved in the 'sustainable management of their local forest'	Agreed.	None.
Use of traditional methods, are these considered – e.g. horse loggers and getting people involved in forestry and community based woodland. Specific sites and general discussion around the topic.	Horse logging is used occasionally – mainly in areas of high recreation pressure. Comments on community involvement noted, but must be borne in mind that we see our role as responding to community development.	Text in recreation and community sections altered.
Partnerships: welcome this proposed response but suggest natural heritage benefits could also be developed alongside economic and community capacity.	Agreed.	Text amended accordingly.
Access and Health		
Access: we recommend amendment of the proposed response to enhance access provision in appropriate areas (i.e. evaluate access arrangements for areas where there are natural heritage sensitivities such as disturbance to priority species).	Agreed.	Text amended in biodiversity key theme.

Consultation Comment	Response	Amendment made to the Plan?
New woodland: while we support the general principle of new woodland in lowland areas to strengthen links with communities, proper evaluation of the natural heritage value of the habitat proposed for woodland is required and creation of appropriate woodland which enhances landscape, biodiversity and recreational value.	Agreed, but will be covered in the EIA determination and stakeholder consultation for any new woodlands.	Text amended in access and health key theme.
Environmental Quality		
Water quality: suggest reference to SNH along with SEPA under water quality re the River SACs. Also include reference to the Habitats Directive.	Agreed.	None.
We support identification of water quality as a key issue in the District and given the particular sensitivities within a number of major water bodies/water courses in the District such as the Rivers Tay and South Esk. We welcome cognisance of the need for good operational forestry practice and also recommend mention of impacts on particularly sensitive species, for example sedimentation and juvenile freshwater pearl mussels.	Noted, and additional point agreed.	None.
Heritage interest: consider including heritage features such as policy woodlands, wood pasture systems and the Carse of Gowrie orchards.	The value of this type of heritage interest appears to be covered in the plan. Specific reference refers to areas outwith the national forest estate.	None.
Landscape: delete reference to Caenlochan (Glen Doll) as this is not an NSA.	Glen Doll is covered by a NSA but it was incorrectly named. Correct name is Deeside and Lochnagar,	This NSA was not specifically referenced in the final plan, so no action required.
Landscape – needs to be more prominent in FDSP.	Agreed.	Text altered where appropriate and a commitment made to enhancing the landscape as one of the District priorities.
Biodiversity		
Designated sites: specific reference to the River Tay and South Esk SACs is needed.	Agreed.	Text amended accordingly.
We support the inclusion of the restoration of PAWS as a key issue for the Tay Forest District and the need to balance other factors such as needs of red squirrels. Further discussion is required at a strategic/national level in order to define the relationship between key forests for red squirrels and PAWS. We welcome the reference to the increase of diversity of forest habitat and protection/restoring open habitats such as bogs and forest/moorland margins.	Noted.	Text amended accordingly.
We recommend the inclusion of the Importance of transitional/shrubby/edge ecotones in management of woodland and open ground and also in the creation of new woodland.	Agreed.	None.
Types of forest and tree species: we suggest reference to ancient/long established woodland and PAWS, and recognition of the variety of woodland habitats in the Tay district.	Agreed.	Text strengthened accordingly in relation to access code and core paths.

Consultation Comment	Response	Amendment made to the Plan?
The key issue for the 40 woodland SSSI sites in SNH's Tayside and Clackmannanshire area is the inability to regenerate within the sites given their current size. In the very long term, natural events will create open space and suitable conditions for natural regeneration. Another management measure in support of this would be an undertaking to support regeneration immediately adjacent to existing boundaries of SSSIs.	Agree with the sentiment and although there are limited occasions where the national forest estate will provide the expansion areas for regeneration we are happy to respond to these opportunities.	Text amended accordingly.
Priority habitats; we welcome the aspiration for restoring PAWS sites.	Noted.	Text amended accordingly.
Priority species and habitat networks: the commitment to priority species and habitat networks is welcomed.	Noted.	None.
We suggest consideration of opportunities to create/enhance transitional ecotone areas as part of the forest resource.	Agreed.	None.
Tourism and cultural heritage', we recommend reference to maintaining/enhancing landscape quality which underpins the area's tourism and recreational value.	Agreed.	Text amended accordingly.
Given the importance of the biodiversity of the District (e.g. capercaillie, black grouse, osprey) this also merits inclusion as a key area.	Agree the sentiment and we will look after priority species as part of our management. However, on a national scale it would not feature as one of our relatively high priorities.	Text amended accordingly.
Plantations on Ancient Woodland Sites (PAWS): we welcome the proposals for restoration of PAWS, and note the potential for conflict between full restoration of the sites and the needs of red squirrels. We note the target of 75% restoration but suggest the needs of PAWS and red squirrels needs to be considered together at a national/strategic level to ascertain an appropriate balance.	Noted – will be covered in forthcoming biodiversity plan. All PAWS sites have also been surveyed to assess residual native woodland value, which is minimal in some locations.	None.
Biodiversity: we suggest clarification of this section. Should it encompass reference to the rich and varied biodiversity in the Forest District Area and habitat types (e.g. gorge woodlands and upland heath) and placing these into a national/international context, or is it restricted to a description of the National Forest Estate? If the former, we suggest amendment of Table 3 to reflect more fully these key sites and species in the Forest District; the examples seem to be derived from the Forestry Commission's National Forest Estate.	It is the latter.	None.
General comments on partnerships, management with neighbouring land owners, concepts of wild land.	Noted.	Text amended accordingly.

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

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

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

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

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