

# SEA Post Adoption Statement

## Trees and Woodland Strategy



9 January 2020

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### Background

The purpose of the Loch Lomond & The Trossachs National Park Trees and Woodland Strategy (the Strategy) is to help deliver the outcomes and objectives set out in the [National Park Partnership Plan 2018-23](#) and [Scotland's Forestry Strategy 2019-2029](#), by developing opportunities that:

- Create new woodlands – ranging from native woodlands to mixed woodlands comprising mainly productive conifer species (referred to as productive conifer woodland in the Strategy);
- Improve woodland biodiversity;
- Enhance the existing contribution of woodlands to the Special Landscape Qualities (SLQs) of the National Park; and
- Improve the resilience and sustainability of woodlands, both environmentally and economically.

The Strategy promotes sustainable forestry based on delivering environmental, economic and social benefits now and in the future

The Strategy details the considerations for woodland creation and woodland management proposals within the National Park ensuring that they contribute to Scottish Government commitments to help mitigate the current crises in the global climate emergency and loss of biodiversity. It is a decision-making tool to help drive the delivery of woodland objectives within the National Park and support effective consultation between all partners on woodland creation and management proposals. The National Park Authority intends to review this document in 2029, and to monitor progress of woodland expansion on an annual basis.

### Why a Trees and Woodland Strategy?

Rather than referring to a 'Forestry Strategy', we have named the document 'Trees and Woodland Strategy' in order to recognise the importance of individual trees and tree groups in the landscape and their contribution to natural capital in the context of integrated land management in the National Park. In the Strategy the terms 'woodland' and 'forest' are used interchangeably. The Strategy has been produced in line with the Planning (Scotland) Act 2019 and current Scottish Forestry guidance 'The Right Tree in the Right Place', through close working with our partners in Scottish Forestry.

The final version of the Strategy can be viewed on our website alongside an interactive online map and supporting documents such as the Habitats Regulations Appraisal and Strategic Environmental Assessment (SEA) Environmental Report - <https://www.lochlomond-trossachs.org/park-authority/publications/treesandwoodlands/>.

A draft Strategy was prepared in early 2019 and this was subject to SEA. The associated draft Environmental Report was consulted on alongside the draft Strategy. This consultation ended on 10 June 2019.

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### Strategic Environmental Assessment Process

The Environmental Assessment (Scotland) Act 2005 (the '2005 Act') requires public bodies in Scotland to carry out SEA on their plans, programmes and strategies. SEA is a way of examining plans, programmes and strategies as they develop, to identify any significant effects they may have on the environment. It ensures that environmental considerations are taken into account. SEA also aims to build in mitigation measures, to avoid or minimise any potentially significant adverse effects on the environment, and look for opportunities to enhance a strategy's environmental performance.

This SEA process began with the production of a Scoping Report which was submitted to the SEA Gateway on 20 August 2018. Representations received from the SEA Consultation Authorities (Scottish Environment Protection Agency (SEPA), Scottish Natural Heritage (SNH) and Historic Environment Scotland (HES)) to the scoping stage, helped to inform the content of the draft Strategy and the following stages of the SEA process. The Consultation Authorities were generally supportive of the approach outlined in the Scoping Report which included scoping all SEA topic areas into the assessment. Comments from the Consultation Authorities were incorporated into the final assessment methodology and these are summarised in Appendix A of the Environmental Report. The assessment focussed on the draft *Strategy Vision*, *Strategic Objectives* and *Native Woodland Creation Opportunities map* elements of the Strategy.

The assessment and production of the SEA Environmental Report progressed in parallel with the preparation of the draft Strategy. Following consultation on the draft Strategy and associated Environmental Report, full details of the comments submitted by individuals and organisations were collated and an analysis carried out of the consultation responses. For further details of the consultation responses and analysis, please see Appendix 1 (Consultation Report) and Appendix 2 (Consultation Responses) of the National Park Authority Trees and Woodlands Strategy board paper - <https://www.lochlomond-trossachs.org/park-authority/our-board-committees/meetings/board-meeting-24th-october-2019/>.

This Post Adoption Statement concludes the SEA process and sets out those ways in which the findings of the SEA Environmental Report, and the views expressed by consultees have been taken into account.

Section 18(3) of the Environmental Assessment (Scotland) Act 2005 sets out the information that should be included in the Post Adoption Statement. This can be summarised as:

- how the environmental considerations have been integrated into the plan, programme, or strategy;
- how the Environmental Report has been taken into account;
- how the opinions of consultees have been taken into account;
- the reasons for choosing the strategy as adopted, in light of the other reasonable alternatives considered; and
- the measures to be taken to monitor the significant environmental effects of the implementation of the plan, programme or strategy.

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### Integration of Environmental Considerations into the Strategy

This section explains how key environmental considerations were identified and how these were taken into account in the development of the final version of the Strategy.

The National Park is a Category V Protected Landscape as defined by the International Union for Conservation of Nature, described as an:

- *“area of land with coast and sea as appropriate, where the interaction of people and nature over time has produced an area of distinctive character with significant aesthetic ecological and cultural value and often with high biological diversity. Safeguarding the integrity of this traditional interaction is vital to the protection maintenance and evolution of such an area”.*

The Strategy objectives will be delivered in line with the four aims of National Parks:

- a) Conserve and enhance the natural and cultural heritage of the area,
- b) Promote the sustainable use of the natural resources of the area,
- c) Promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public, and
- d) Promote sustainable economic and social development of the area’s communities.

These aims are to be pursued together. However, if it appears that there is conflict between the first aim, the conservation and enhancement of the natural and cultural heritage, and any of the others, we must give greater weight to the first aim (Section 9(6) of the National Parks (Scotland) Act 2000). This is often referred to as the ‘Sandford Principle.’

A list of the key environmental characteristics of the National Park was previously developed and refined by staff across the organisation for the SEA of the Local Development Plan, and most recently the National Park Partnership Plan. This included expertise in; planning, ecology, landscape, trees and woodlands management, access and environment. This list was reviewed and updated for the purposes of the Strategy SEA. From the outset, the preparation of the environmental baseline for the SEA helped to frontload environmental considerations into the draft Strategy. Subsequent consultation with the SEA Consultation Authorities assisted in highlighting key environmental issues for further consideration.

A high level of mitigation is already built into the woodland creation and management process due to the requirements of the Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017, felling permissions and grant administration procedure along with compliance with the UK Forestry Standard (UKFS).

As National Parks are classified as ‘sensitive areas’ under the Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017, all forestry projects (e.g. afforestation, deforestation, forest roads and forest quarries) must be subject to an Environmental Impact Assessment (EIA) screening opinion from Scottish Forestry. This process ensures that any significant environmental effects from forestry projects within the National Park are identified and addressed at an early stage.

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UKFS details how sustainable forestry will be undertaken by setting out relevant legislation and good practice which all forestry proposals must comply with. It is the standard against which all woodland proposals are assessed, covering biodiversity, climate change, historic environment, landscape, people (including access), soil and water. The Scotland's Forestry Strategy 2019-2029 (SFS) outlines how, through compliance with UKFS, the principles of sustainable forest management will be implemented in practice. The SFS has also been subject to SEA and significant environmental effects have been addressed through this process.

As the National Park Strategy sits below these higher tier plans and the EIA requirements for forestry projects within the National Park, the potential for significant environmental effects from the Strategy is relatively low. **Table 1** summarises the key assumed mitigation and control measures relevant to each of the Strategic Objectives included in the Strategy.

**Table 1: Assumed mitigation measures under each Strategic Objective**

Strategic Objective	Assumed Mitigation	Responsibility
1. Increasing woodland cover for biodiversity and climate change mitigation	UKFS and Legislation such as Wildlife and Countryside Act 1981, Forestry and Land Management (Scotland) Act 2018, Forestry EIA regulations.)	Scottish Forestry Private companies Land owners and Managers National Park Authority Environmental regulators
2. Improving existing woodland condition and diversifying woodland management	UKFS Forestry EIA regulations	Scottish Forestry Private companies Land owners and Managers Non-governmental organisations National Park Authority Environmental regulators
3. Protecting and enhancing the landscape	UKFS Forestry EIA regulations	Scottish Forestry Private companies Land owners and Managers Non-governmental organisations National Park Authority
4. Maintaining and enhancing economic sustainability through forestry-related skills and business development	UKFS Planning system	Scottish Forestry National Park Authority Woodland users Woodland owners and managers Private companies/Users Non-governmental Organisations
5. Promoting cooperative woodland management and	UKFS	Scottish Forestry National Park Authority

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creation as part of an integrated land management approach		Private companies Land owners and Managers Non-governmental organisations
6. Improving community empowerment and resilience through active engagement in woodland proposals	UKFS	Scottish Forestry Community Organisations Non-governmental organisations
7. Encouraging and promoting public access to woodlands for recreation and improving people's quality of life	UKFS	Scottish Forestry Woodland users Woodland owners and managers National Park Authority Non-governmental organisations

Commencing the SEA process alongside the initial development of the Strategy made it possible to amend the guidance in the Strategy to address potential environmental issues as they were identified. This included refining the *Opportunity mapping for native woodland creation* to highlight national/international nature conservation sites that would be sensitive to native woodland creation. **Table 2** illustrates the connection between the SEA Topics and the key guidance within section 5 of the Strategy.

**Table 2: Key mitigation embedded into guidance of final Strategy**

SEA Topics	Key guidance within section 5 of the Strategy
Biodiversity	<ul style="list-style-type: none"> <li>• Key Woodland Habitats</li> <li>• Key Species</li> <li>• Designated Sites</li> <li>• Open Ground Habitats</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>• Landscape integration and Special Landscape Qualities</li> </ul>
Population & Human Health	<ul style="list-style-type: none"> <li>• Woodlands and People</li> </ul>
Soil & Geology	<ul style="list-style-type: none"> <li>• Geological Conservation Review Sites</li> <li>• Peatland</li> <li>• Water and Soil Management</li> </ul>
Water	<ul style="list-style-type: none"> <li>• Water and Soil Management</li> </ul>
Climate	<ul style="list-style-type: none"> <li>• Peatland</li> <li>• Water and Soil Management</li> </ul>

The assessment of the environmental effects of the Strategy was undertaken and options for mitigation to avoid, reduce, remedy or compensate for the environmental effects were considered.

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All of the preferred options identified in the Environmental Report have been incorporated into the final Strategy.

### Main findings of the SEA

The assessment concluded that the Strategy, with its emphasis on enhancing natural capital through appropriate woodland creation and management, will have overall positive environmental effects. Some potential for mixed environmental effects were identified for Strategic Objective 7 (Encouraging and promoting public access to woodlands for recreation and improving people's quality of life) but it is anticipated that any negative effects will be localised and could be mitigated through established regulatory regimes and guidance.

These results reflect the wide ranging benefits that can be realised through woodland creation and management in line with the Strategy plus the existing safeguards built into the UK Forestry Standard (UKFS) and statutory requirements such as Habitats Regulations Appraisal (HRA) and Environmental Impact Assessment (EIA).

In terms of cumulative impacts, overall positive effects are predicted from the interaction of the key elements of the Strategy and there is potential for further positive effects in combination with other plans, programmes and strategies. In particular, there is potential for positive in-combination effects to help address the following environmental issues:

- Climate change mitigation and adaptation
- Reducing habitat fragmentation and improving ecosystem health
- Improving quality of life
- Protecting and improving the landscape

### Strategy consultation feedback

21 written responses were submitted during the public consultation period. These responses were from a range of organisations and individuals. The comments were generally constructive suggestions ranging from suggested improvements to the draft Strategy, recognising the contribution of trees and woodland to the National Park and the overall aspirations set out in the Strategy. However a number of responses considered that the Strategy did not give sufficient consideration or details regarding topics such as productive forestry, biodiversity issues and wildness. There were also a significant number of comments regarding the vision which lead to it being revised. Some responses related to the National Park Authority's role as a planning authority in relation to planning casework, which were not relevant to this consultation. The Strategy has been revised following the analysis of the responses received during the public consultation along with other developments since the draft was produced, particularly the recognition of the biodiversity crisis and Scottish Government's announcement of the climate emergency. Please see Appendix 1 (Consultation Report) and Appendix 2 (Consultation Responses) of the National Park Authority Trees and Woodlands Strategy board paper for further details of the consultation responses and analysis - <https://www.lochlomond-trossachs.org/park-authority/our-board-committees/meetings/board-meeting-24th-october-2019/>.



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Minor amendments to the Habitats Regulations Appraisal were proposed by statutory consultees and these have been incorporated into the final version of the HRA. No changes were proposed to the Strategic Environmental Assessment but the Environmental Report has been amended to reflect the changes that have been made to the *Strategy Vision*, *Strategic Objectives* and *Native Woodland Creation Opportunities map* sections of the draft Strategy. These changes have not altered the conclusions of the draft Environmental Report.

### Summary of the final Strategy

The final Strategy can be viewed at - <https://www.lochlomond-trossachs.org/park-authority/publications/treesandwoodlands/>. The first objective of the final Strategy has been amended from the consultation document to give further emphasis to the biodiversity crisis and climate emergency. Others have had minor edits for clarification since the publication of the consultation version. The strategy has seven objectives:

- i. Increasing woodland cover for biodiversity and climate change mitigation, with a key focus on improving connectivity of existing native woodland and scrub habitats.
- ii. Improving woodland condition and diversifying woodland management to enhance benefits to biodiversity, landscape quality and timber products and services.
- iii. Protecting and enhancing this nationally important landscape.
- iv. Maintaining and enhancing economic sustainability through forestry related skills and business development.
- v. Promoting cooperative woodland management and creation as part of an integrated land management approach.
- vi. Improving community empowerment and resilience through active engagement in woodland management.
- vii. Encouraging and promoting public access to woodlands for recreation and improving people's quality of life.

To deliver across these objectives, and reflecting their inter-connectedness, the detailed guidance for delivering the strategy is structured around five main topics. These are essentially the same as those in the consultation document and are summarised below:

- i. Landscape integration, setting out how forestry proposals should take the landscape character and special landscape qualities of the National Park into account.
- ii. Habitat enhancements including sections on woodland habitat networks, restructuring of productive conifer including those planted on ancient woodland sites, riparian and montane woodland, key woodland habitats and species and invasive non-native species.

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- iii. Integrating woodland with other land uses, including sections on designated sites, open ground habitats, peatland, deer management, deer fencing, agricultural land management and water and soil management.
- iv. Social and rural economic development, including sections on woodland management skills, timber products, haulage and timber transport, community empowerment, tourism initiatives, consultation and stakeholder engagement and natural flood management.
- v. Woodlands and people, including sections on responsible access and health.

### Comments on the Environmental Report

The Consultation Authorities welcomed that the comments provided at the Scoping stage were reflected in the Environmental Report. There was also general support for the scope and conclusions of the assessment as well as the mitigation measures that were identified to address any potential negative impacts. The proposed use of the National Park Partnership Plan indicators of success to monitor the impact of the Strategy was also supported.

Aside from the feedback from the Consultation Authorities, no specific comments on the draft Environmental Report were received from respondents to the consultation on the draft Strategy. In future, the National Park Authority will give consideration to the inclusion of specific questions on the draft Environmental Report as part of any public consultation on plans, programmes and strategies to encourage greater engagement in the SEA process.

### Reasons for selecting the Strategy as adopted

The 2005 Act requires that the National Park Authority identify, describe and evaluate the likely significant effects on the environment of any reasonable alternatives to the draft Strategy, taking into account its objectives and geographical scope.

The extent to which alternatives could be considered 'reasonable' was influenced by the existing legislative and policy context the document must reference and align with (e.g. Scotland's Forestry Strategy), and current Scottish Government commitments and targets such as the woodland creation target in the Climate Change Plan.

Three alternative approaches for protecting, enhancing and using trees and woodlands within the National Park were identified and assessed in the Environmental Report - No Strategy, High Level Strategy and Detailed Strategy. The 'High Level Strategy' was identified as the preferred option in the Environmental Report as this option builds on national policy and highlights key strategic issues, sensitivities and opportunities within the National Park. In doing so, it will help to steer proposals to the most appropriate locations that maximise the benefits of woodland creation/management whilst minimising any potential negative impacts. It will also allow grant uplift to encourage woodland creation proposals that are in line with the Strategy. Whilst individual proposals that come forward in line with the Strategy will still need to be assessed, it is likely that any negative impacts can be addressed through sensitive design in line with the principles detailed in the Strategy.



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The 'No Strategy' alternative effectively involved considering woodland creation/management proposals on a case by case basis using relevant national policies and legislation. Whilst this approach would ensure that there would be no significant negative environmental effects, there is a risk that it would not realise the maximum benefits from woodland creation/management proposals as the key strategic issues, sensitivities and opportunities within the National Park would not be promoted by this approach. In addition, as there would be no grant uplift in the absence of the Strategy and proposals that tackle key strategic priorities within the National Park would not be incentivised. In the absence of a Strategy for the National Park, proposals would not be steered away from sensitive locations or directed to locations that would deliver the greatest biodiversity benefits through improved connectivity. There would also be a greater risk of conflicts with other land uses and whilst any conflicts are likely to be addressed at the consenting stage, this option would not steer proposals away from inappropriate locations at an early stage. This option was not selected as the preferred approach for these reasons.

The 'Detailed Strategy' alternative would have provided guidance on all local woodland creation/management issues at an individual landowner scale. Whilst this option potentially offers the greatest positive environmental effects, it would be a highly complex and time consuming task to provide the level of detail required to provide robust guidance at this scale. It is unlikely that there is sufficient existing data to inform such an approach and either extensive additional data would have to be commissioned or there would be a risk of unintended impacts on SEA Topics. As a consequence, Uncertain/Major Positive impacts were predicted for all SEA Topics. There is also a risk that such a prescriptive approach may not be accepted by stakeholders and it would quickly become out of date. This option was not selected as the preferred approach for these reasons.

The findings of the Environmental Report, including the consideration of reasonable alternatives, were supported by the Consultation Authorities.

### Monitoring

Section 19 of the 2005 Environmental Assessment (Scotland) Act requires the Responsible Authority to monitor significant environmental impacts arising as a result of the implementation of the plan, programme or strategy. The purpose of the monitoring is to identify any unforeseen adverse effects at an early stage and to enable appropriate remedial action to be taken.

To ensure efficient use of resources and integration with other plans and programmes, this requirement will be met by gathering information from the existing monitoring protocols and processes. In particular, the impacts of the implementation of the adopted Strategy on the environment will primarily be monitored via the National Park Partnership Plan (2018 to 2023) indicators of success. **Table 3** illustrates the connection between the National Park Partnership Plan Key Indicators and the SEA Topics.

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**Table 3: National Park Partnership Plan – Key Indicators and associated SEA Environmental Topics**

National Park Partnership Plan – Key Indicators & Targets	SEA Environmental Topics
<b>1. Area of new woodland</b> <ul style="list-style-type: none"> <li>2000 hectares of woodland expansion by 2023</li> </ul>	Biodiversity, Air Quality, Climate
<b>2. Area and condition of restored peatland</b> <ul style="list-style-type: none"> <li>2000 hectares of restored peatland by 2023</li> </ul>	Biodiversity, Soil & Geology, Climate, Air Quality
<b>3. Percentage of designated sites in favourable condition</b> <ul style="list-style-type: none"> <li>Increase from 2017 baseline of 76% of designated site features to 80% by 2023</li> </ul>	Biodiversity
<b>4. Percentage of waterbodies achieving at least good ecological status</b> <ul style="list-style-type: none"> <li>Increase from 2016 baseline of 44% to 59% by 2023</li> </ul>	Biodiversity, Water
<b>6. Proportion of people taking part in active recreation</b> <ul style="list-style-type: none"> <li>Increase from 2015/16 Visitor Survey baselines of 24% for active sport and 49% for low-level walking</li> </ul>	Population & Human Health,
<b>8. Reported public experience of the Park’s settlements and landscapes</b> <ul style="list-style-type: none"> <li>Increase in proportion of people reporting a good quality experience</li> </ul>	Landscape, Cultural Heritage
<b>10. Number of young people having an outdoor learning experience in the National Park</b> <ul style="list-style-type: none"> <li>At least 2500 young people per year over the Plan period</li> </ul>	Population & Human Health
<b>13. Number of community-identified projects delivered</b> <ul style="list-style-type: none"> <li>Delivery of 3 projects per Community Action Plan by 2023</li> </ul>	Population & Human Health
<b>14. Number of new skills development opportunities from project in the National Park</b> <ul style="list-style-type: none"> <li>Increase opportunities in the National Park over the Plan period</li> </ul>	Population & Human Health,

[Wild Park](#) is the biodiversity action programme for the National Park. It identifies four Key Environmental Threats. The Trees and Woodland Strategy will help address the following three

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threats and their indicators of success will be reported on annually by the relevant working groups. Table 4 illustrates the connection between the Wild Park Indicators of success and the SEA Topics.

**Table 4: Wild Park Key Environmental Threat – Indicators of success and associated SEA Environmental Topics**

Wild Park Key Environmental Threat - Indicators of success by 2023	SEA Environmental Topics
<p><b>1. Unsustainable levels of grazing:</b></p> <ul style="list-style-type: none"> <li>• Park-wide habitat impact assessments occurring in upland and woodland habitats.</li> <li>• Number of native woodlands in the 'high' and 'very high' herbivore impact categories reduced or management in place to ensure there will be a reduction in impacts.</li> </ul>	Biodiversity, Material Assets
<p><b>2. Invasive non-native species</b></p> <ul style="list-style-type: none"> <li>• Increase the area and number of sites under active rhododendron management (to tackle invasive rhododendron).</li> <li>• Increased sightings of red squirrels (as they respond to declines in invasive grey squirrels).</li> </ul>	Biodiversity
<p><b>3. Climate change pressures</b></p> <ul style="list-style-type: none"> <li>• Increased area (ha) of woodland expansion (as reported under the National Park Partnership Plan).</li> <li>• Increased area (ha) of existing native woodland under positive management</li> <li>• Increased number of people engaged in woodland creation and management through training or demonstration days</li> </ul>	Biodiversity, Population & human health, Air Quality, Climate

The National Park Partnership Plan Key Indicators and Wild Park Indicators of success will be used to monitor the impact of the Strategy on the environment and inform the review of the Strategy in 10 years' time. This information will be supplemented by other available data sources such as the National Forest Inventory which is a rolling programme designed to provide accurate information about the size, distribution, composition and condition of our forests and woodlands and also about the changes taking place in the woodlands through time.

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### Conclusion

The National Park Authority is content that the level and scope of the SEA is proportionate and that, given the high-level nature of the Strategy, it has been pitched at the appropriate level. This conclusion is also supported by feedback from the Consultation Authorities on the Environmental Report.

This Post Adoption Statement concludes the SEA process, setting out the ways in which the findings of the SEA Environmental Report and the views expressed during the consultation on the SEA Environmental Report, as well as on the draft strategy, have been taken into account within the finalised Strategy.