



Deer Commission for Scotland

Scotland's Wild Deer – a National Approach: SEA Post-adoption Statement

12th December 2008

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Report No. 684

Status: Final

Project No: 11853j

Copy No: 1

Rev. No: 01



Development Services



Catchment Management



Sustainability

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1. INTRODUCTION

1.1 Background

This document (referred to here as the SEA Post-adoption statement) has been prepared in accordance with the Environmental Assessment (Scotland) Act (2005) and the Strategic Environmental Assessment Toolkit (Scottish Executive, 2006).

- It is an SEA Post-adoption Statement for Scotland's Wild Deer – a National Approach (the Strategy);
- The PPS was adopted on 11th November 2008 and
- The Responsible Authority is the Deer Commission for Scotland.

1.2 Availability of documents

The full Strategy as adopted, along with Environmental Report and accompanying appendices and the SEA Post-adoption Statement, are available on the Responsible Authorities' website at:

www.dcs.gov.uk/info_strategy.aspx

The Strategy as adopted, along with the Environmental Report and accompanying appendices and this SEA Post-adoption Statement may also be inspected, free of charge, at the Principal office of the Responsible Authority:

Deer Commission for Scotland
Great Glen House
Leachkin Road
Inverness
IV3 8NW

2. KEY FACTS

Name of Responsible Authority: Deer Commission for Scotland

Title of PPS: Scotland's Wild Deer – a National Approach

Purpose of PPS: To provide a framework to enable widespread understanding and achievement of sustainable deer management

What prompted the PPS (e.g. a legislative, regulatory or administrative provision):

The development of the strategy was prompted by the need to address the significant changes in public policy and increasingly integrated approach to land management.

Period covered by the PPS: The strategy sets out a 20 year vision.

Frequency of PPS updates: Implementation plans will be produced every 3 years and will be reported on annually. The strategy will be reviewed on a rolling 5-year programme.

PPS area: Scotland

Summary of nature/ content of PPS: The strategy sets out ways to make the most of the wild deer asset, managing deer for the benefit of the nation, and at the same time ensuring that deer welfare is safeguarded. It aims to achieve this through managing deer in a way that

secures a high quality, robust & adaptable environment, sustainable economic development and social well-being.

Date adopted: 11th November 2008

Contact name and job title: Jessica Findlay, Deer Commission for Scotland Policy Officer

3. THE STRATEGIC ENVIRONMENTAL ASSESSMENT PROCESS

Scotland's Wild Deer – a National Approach (The Strategy) has been subject to a process of Strategic Environmental Assessment (SEA), as required under the Environmental Assessment (Scotland) Act (2005). The SEA has helped ensure that the potential environmental effects of the Strategy have been identified and taken into account as an integral part of the Strategy-development process. The SEA process undertaken on the Strategy has included the following activities:

- Taking into account the views of the Scottish Environment Protection Agency, Scottish Natural Heritage and Historic Scotland regarding the scope and level of detail that was appropriate for the assessment of the draft Strategy and for the preparation of an SEA Environmental Report.
- Preparing an Environmental Report on the likely significant effects on the environment of the draft Strategy which included consideration of:
 - Environmental baseline information relating to the current state of the environment of Scotland and deer management activities;
 - Relationship of the draft Strategy with other relevant plans, programmes, strategies (PPS) and environmental protection objectives;
 - Key existing environmental issues relevant to the development of the Strategy;
 - The Strategy's likely significant effects on the environment (positive and negative);
 - Measures envisaged to mitigate adverse and enhance beneficial effects;
 - Comparison of reasonable alternatives to the strategy including an outline of the reasons for selecting the preferred alternative;
 - Monitoring measures to ensure that any unforeseen environmental effects will be identified allowing for appropriate remedial action to be taken.

The draft Strategy and its accompanying Environmental Report were consulted on for a period of 3 months between 5th November 2007 and 1st February 2008. Both the draft Strategy and the Environmental Report were made available online and at the principal offices of the Deer Commission for Scotland (DCS).

Following on from the consultation, the Environmental Report and the results of consultation on the draft Strategy and its accompanying Environmental Report were taken into account and used to guide the final decisions regarding the content and scope of the Strategy as adopted.

The adopted Strategy includes a commitment to monitor the significant environmental effects of its implementation and to identify any unforeseen adverse significant environmental effects and take remedial action as appropriate. Monitoring for significant environmental effects has been integrated, as far as possible, with plans for monitoring the progress made to delivering the Strategy itself (see section 7).

4. HOW ENVIRONMENTAL CONSIDERATIONS HAVE BEEN INTEGRATED INTO THE STRATEGY AND HOW THE ENVIRONMENTAL REPORT HAS BEEN TAKEN INTO ACCOUNT

As the focus of the Strategy is broadly environmental, environmental considerations have been core to its development. This section describes:

- How environmental considerations have been integrated into the development of the Strategy (section 4.1); and
- How the Environmental Report has been accounted for in the development of the Strategy as adopted (section 4.2).

4.1 How environmental considerations have been integrated into the Strategy

The Strategy sets out an overall vision for wild deer over the next 20 years which is:

"In 20 years time, there will be widespread understanding and achievement of 'sustainable deer management' – the conservation, control and use of all species of deer."

The adopted approach for delivering this vision has been developed with due consideration of the environmental constraints, vulnerabilities and opportunities within which sustainable deer management in Scotland needs to operate. This section outlines the steps that have been taken during the development of the Strategy, both as an inherent part of the Strategy-development process, and through the SEA process, to integrate environmental considerations.

4.1.1 Approach taken to integrating environmental considerations into Strategy-development

The remit of the DCS and their partners (including Scottish Natural Heritage and Forestry Commission Scotland) includes environmental protection and enhancement. As such, the consideration of the environment is an inherent aspect of their day-to-day work and decision-making processes. Subsequently, the SEA process provided a framework to facilitate the transparent and explicit recording of environmental considerations in decision-making. In addition, the SEA provided environmental information to support and inform key decision-making stages. Figure 4-1 provides an overview of how the SEA process was integrated with the Strategy-development process.

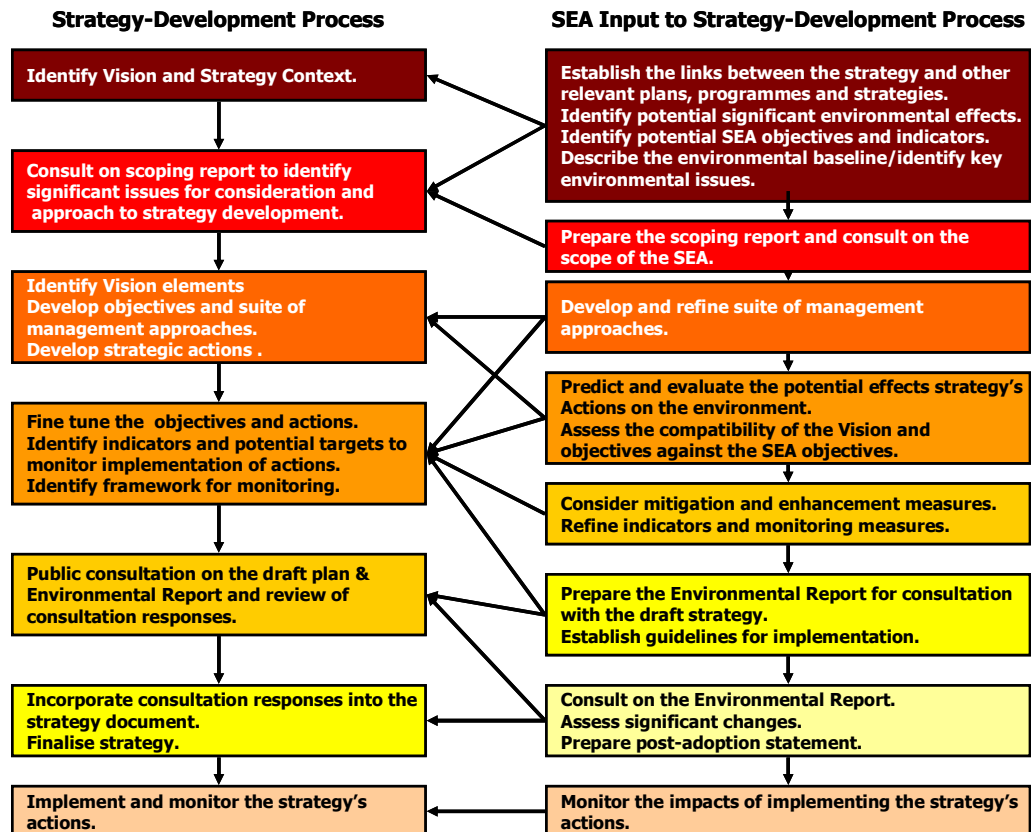


Figure 4.1 Integration of the SEA into the Strategy-development process

Source: Adapted from Therivel (2004) and Fife Council SEA Toolkit (2006)

Throughout the Strategy-development process, a number of approaches were adopted to support the explicit identification and consideration of relevant environmental issues. These included:

- Meetings and workshops involving the Strategy-development team, Steering Group, Advisory Group, SEA team and other key stakeholders;
- Email communications between SEA/ Strategy-development teams and other key stakeholders for rapid/ informal feedback on approach and key issues; and
- Iterations of draft Strategy/ SEA reports – a highly iterative approach was adopted for the development of the Strategy and the SEA. This helped ensure that the final draft Strategy and final Environmental Report were based, as far as possible, on the consensus of all stakeholders.

The DCS identified and adopted a 'Critical Path' for Strategy-development early on in the process. This mapped out the overall approach and identified key stages and opportunities where environmental considerations and the SEA process could inform the development of the Strategy. In addition, it identified the type of approach e.g. meetings, workshops etc. that may be useful, at each stage of Strategy-development, for facilitating the consideration of environmental issues. The Critical Path is described below in Table 4-1.

Table 4.1 Scotland's Wild Deer – a National Approach Critical Path

Note: colour coding used in Critical Path table reflects colour coding in Figure 4-1 above.

Critical Path: Scotland's Wild Deer – a National Approach						
Approaches and opportunities for environmental considerations to inform the Strategy-development process						
Month	Strategy-development	SEA tasks	Board/ Committees	Consultation		
January 2007	Critical Path identified	Scoping <ul style="list-style-type: none"> • Develop environmental baseline • Identify key environmental issues • Develop SEA framework • Develop approach to assessment 		Informal discussion with Strategy/ SEA stakeholders	26/01/07 Steering Group Meeting	
			29/01/07 Strategy Committee			
February 2007			12/02/07 Board/ staff workshop (visioning and identification of key issues)			
March 2007	Scope baseline, key issues, vision and outcomes				07/03/07 Board meeting (consider process and timetable)	12/03/08 Steering Group Meeting
					08/03/07 Board/ staff workshop (identify key issues)	
April 2007	Publish Strategy/ SEA Scoping Report				03/04/07 1 st Advisory Group Seminar – scoping vision, outcomes and issues to address	
May 2007	Develop objectives/ what needs to be done and how to assess progress	Assess developing Strategy and provide commentary Draft the Environmental Report within the consultation	08/05/07 Strategy Committee (with Scottish Natural Heritage board sub-		Steering Group Meeting.	

		document	group and Forestry Commission Scotland – consider issues)		
June 2007			12/06/07 Board Meeting		08/06/07 DMRT 2 nd Advisory Group Seminar –p what needs to be done
July 2007					Steering Group Meeting
August 2007	Finalise Consultation Draft	Finalise Environmental Report elements within consultation document	22/08/07 Strategy Committee (with SNH board sub-group and FCS – consider consultation draft)		
September 2007	Approval of consultation draft		25/09/07 Board meeting (approve consultation)		Steering Group Meeting
October 2007	Design and Print				
			29/10/08 Strategy Committee		
November 2007	Public consultation			Formal consultation on draft Strategy and Environmental Report	
December 2007			05/12/07 Board meeting		
January 2008	Report on consultation and consider changes	Record changes	Strategy Committee (with SNH board sub-group and FCS –	Feedback to stakeholders	3 rd Advisory Group Seminar – issues arising from consultation

			consider changes and completion)		
February 2008	Finalisation of Strategy				Steering Group Meeting
May 2008			Board approve completed Strategy		
June 2008		Develop monitoring framework and identify issues for 1 st Implementation Plan	Develop monitoring framework for significant environmental effects and draft SEA Post-adoption statement.		
September 2008					
October 2008	Integrate monitoring frameworks				
November 2008	Adopt finalised Strategy				
December 2008	Monitor the socio-economic effects of the Strategy and progress towards achieving its objectives.	Publish SEA Post-adoption Statement and monitor significant environmental effects of the adopted Strategy.			

4.1.2 Environmental considerations in Strategy-development and key outcomes

As environmental issues are core to the Strategy, a number of environmental considerations were inherent to its development. The SEA process helped to build on considerations through:

- Provision of environmental baseline information and development of indicators to monitor the baseline after adoption of the Strategy;
- Identification of key environmental issues;
- Identification of environmental protection objectives for consideration in the Strategy-development process;
- Prediction of the potential environmental effects of the Strategy and other reasonable alternatives; and
- Making recommendations to improve the environmental performance of the Strategy i.e. mitigation and enhancement measures.

During July 2007, a workshop was undertaken with members of the Strategy-development team and Steering Group and led by the SEA consultants. Its purpose was two-fold:

1. To identify potential drivers for change that may influence deer management practices in the future e.g. climate change, land-use change and policy, legislative and administrative change; and
2. Exploring the extent to which the Strategy could respond to, or anticipate future changes that may affect deer management activities.

This workshop helped identify potential environmental (and political, social and economic) constraints, threats and opportunities that deer management may face in the future and alternative deer management approaches that may be more appropriate for dealing with these. These outcomes fed into the Strategy-development process.

This approach aimed to ensure that the Strategy-development process considered potential future environmental issues over the 20 year timescale of the Strategy. Subsequent reviews of the Strategy should consider the suite of alternative deer management approaches developed in the light of available monitoring information and the prevailing environmental conditions.

Environmental considerations in Strategy-development have informed a number of key outcomes, including:

- Revisions to the Strategy's Vision, Guiding Principles and Objectives;
- Revised and updated monitoring framework that considers progress towards achieving the Strategy's high quality environment objectives; and
- Recommendations to consider key environmental issues in other related plans, programmes and strategies (PPS).

Table 4-2 below describes in detail, how environmental considerations have informed the development of the Strategy as adopted.

Table 4.2 Environmental considerations during the development of the Strategy

Strategy-development stage	Environmental considerations	Influence on decision-making in final Strategy	Reference in final Strategy
Initial development	Biodiversity: obligations are likely to become increasingly difficult.	Biodiversity obligations have been given prominence in the final Strategy by the inclusion of the Designated Site targets in the Strategy Actions, Objectives and Guiding Principles.	<ul style="list-style-type: none"> • Guiding Principles (P8, no. 3, bullet 2) • Objectives (P10, 5.1c) • Actions (P13, 6.1.2)
	Biodiversity: there is a need to define objectives for biodiversity outwith those for designated sites.	An objective to 'conserve and enhance biodiversity in the wider countryside' objectives has been included in the final Strategy.	Objectives (P10, 5.1d)
	Ecosystem: there is a need to move away from a species focused approach to focusing on the whole ecosystem.	Increased focus on adopting an ecosystem approach in the Guiding Principles has been included in the final Strategy.	Guiding Principles (P8, no.1)
	Sustainable deer management: clearly defining what is meant by this is key to developing a common understanding.	The vision in the final Strategy focuses on understanding and achieving Sustainable Deer Management. There is also an action to 'Develop effective frameworks for sustainable deer management'.	<ul style="list-style-type: none"> • Vision (P6) • Actions (P15, 6.4.1)
	Balancing objectives: there need to be mechanisms in place to facilitate the balance of potentially conflicting objectives through negotiation and discussion.	There is recognition in the final Strategy that there needs to be more opportunity for representation and improved mechanisms for communicating all issues, including environmental issues, in the discussion	<ul style="list-style-type: none"> • Guiding Principles (P8, nos 1-4) • Actions (P15, 6.4.1)

		of deer management. This will be delivered through Guiding Principles and specific actions.	
First Draft (development of vision, outcomes and objectives)	<ul style="list-style-type: none"> • Vision: there needs to be more emphasis on integration of deer into natural environment. • Objectives: there needs to be a focus on improved data collection. • Outcomes: there is a need to have a better definition of sustainable deer management. 	<ul style="list-style-type: none"> • Vision: inclusion of a guiding principle to integrate deer management with other land-use objectives. • Objectives: recognition that data needs to be better collected through the inclusion of an action and guiding principle on use of sound science. • Outcomes: recognition in the final strategy that sustainable deer management is the overall context within which the Strategy operates. 	<ul style="list-style-type: none"> • Vision (P6) • Guiding Principles (P8, no.5) • Action (P15, 6.4.3) • Guiding Principles (P8, no.1)
Scoping Report Consultation	Integration: more emphasis on integration of deer into the natural environment	As above – inclusion of a guiding principle to integrate deer management with other land-use objectives	Guiding Principles (P8, no.1)
Consultation Draft	<ul style="list-style-type: none"> • Vision: need to change the wording in relation to the environment • Key Issues: too much detail on favourable condition at a given point in time – out of context with the vision • Objectives: potential issue with regard to muntjac and need to develop a consistent approach with regard to sika. There is a need to understand grazing 	<ul style="list-style-type: none"> • Vision: the final strategy takes into account the dynamic nature of the environment through the wording 'a high quality, robust and adaptable environment' • Key Issues: the final strategy changes the emphasis of achieving favourable condition away from 	<ul style="list-style-type: none"> • Vision (P6) • Key Issues (P7, bullet 1 in 'a high quality environment') • Objectives (P9, 5.1b) • Action (P15, 6.4.3)

	impacts of deer in the context of the grazing impacts of other herbivores	statistics and onto principles <ul style="list-style-type: none">• Objectives: the final strategy includes a stronger policy statement on Sika and non-natives in general. Inclusion of an action to improve knowledge of grazing regimes in the final strategy	
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4.2 How the Environmental Report has been accounted for

The assessment of the draft Strategy, as documented in its accompanying Environmental Report, identified a number of potentially significant environmental effects that the Strategy may give rise to. In addition, measures were identified to mitigate, enhance and monitor significant environmental effects.

There are three possible approaches whereby the Strategy can account for recommendations made in the Environmental Report:

- Changes to the Strategy itself e.g. revision/ removal of an objective to mitigate a potential adverse environmental effect;
- Make recommendations for other related PPS and/ or assessment processes to consider potential environmental effects and/ or to action mitigation/ enhancement/ monitoring proposals; and
- Take no action. There is no onus on decision-makers to follow every recommendation in the Environmental Report.

The SEA identified a number of potentially significant negative and positive environmental effects. These are described as part of the monitoring framework in Appendix 1.

Where possible, these have been accounted for through changes to the Strategy itself. A key issue identified in the SEA was the potential for negative environmental effects arising as a result of, in some instances, over emphasis on the socio-economic objectives of sustainable deer management. This has been addressed in the Strategy by emphasising the need to balance the three objectives:

- High quality, robust and adaptable environment;
- Sustainable economic development; and
- Social well-being.

Examples of how the Strategy's objectives have been balanced include:

- Inclusion of the Guiding Principle - '**engaging and communicating with all relevant interests**' focuses on the need for inclusive decision making and conflict resolution. The purpose of this it to try and ensure that deer management activities and decisions take into account all issues and opinions, including those related to the environment; and
- Inclusion of the Guiding Principle - '**integrating deer management and other land-use objectives**' helps to address potential negative environmental effects of sustainable economic development as identified in the Environment Report by establishing a way of working that requires all deer management activities to take the wider environmental context into account.

5. HOW OPINIONS EXPRESSED ON THE ENVIRONMENTAL REPORT DURING THE CONSULTATION HAVE BEEN TAKEN INTO ACCOUNT

In addition to taking into account the findings set out within the Environmental Report, consultation responses to the Environmental Report were also reviewed and addressed where appropriate. The comments received, and the measures that were consequently taken, are summarised in Table 5-1 below.

With respect to the requirements of Regulation 14 of the Environmental Assessment of Plans and Programmes Regulations (2004) (UK Regulations), specific transboundary consultation with other EU Member states was not deemed necessary during this SEA.

Table 5.1: Consultation comments on the Environmental Report and measures taken in response

Stakeholder	Comment Number/ reference if applicable	Comment	How has the comment been accounted for in the revised strategy?	Assessment of significant changes/ additional changes required?
Historic Scotland	3	NPPG5 sets out the role of the planning system in protecting archaeological sites and their settings, including the weight to be given to them in planning decisions rather than simply 'placing restrictions on development of archaeological sites' as stated in Appendix 3 of the Environmental Report.	<ul style="list-style-type: none"> Noted, no change made. More accurate consideration of the scope of SPP23 (which supersedes NPPG5 and NPPG 18) to be give to subsequent revisions of the Strategy and in other related plans and assessments. 	N/A
Historic Scotland	7	The strategy is unlikely to have significant cumulative effects on the historic environment.	No change made to objectives related to the historic environment	N/A
Historic Scotland	7	Condition of scheduled ancient monuments is regularly monitored (around 90% have a Monument Warden Record in place)	<ul style="list-style-type: none"> Noted, no change made. Condition reports of SAMs to be considered in future revisions of the Strategy and in other related plans and assessments. 	N/A
Historic Scotland	8	It would be useful if the SEA Adoption Statement includes a commitment to delivering the mitigation measures and provides further details of where the responsibilities for implementing the mitigation measures lie.	<ul style="list-style-type: none"> This will tie in with the Implementation and monitoring plans. Post-adoption statement/ monitoring framework includes an indication of which organisations 	N/A

			may be responsible for taking a lead/ role in the delivery of mitigation measures.	
SEPA	Section 4 – SEA approach	You should be aware that the Significant Water Management Issues (SWMI) reports for both the Scotland and Solway Tweed River Basin Districts have recently been published for consultation. These outline the most significant issues affecting water quality within these basin districts, which may be of use to you as the strategy is taken forward and implemented.	More emphasis on the integrated nature of the context within which deer management operates, including water courses has been included in the revised strategy. The implementation plan will focus on the specifics of this.	N/A
SEPA	Section 6 – future scenarios and future change	In table 6.2.d (in the Environmental Report), there would appear to be two boxes where the commentary does not match the score provided. Under the flood risk objective, the commentary would appear to suggest that the new strategy may have more positive effects, but this is not reflected in the score. Similarly, on the climate change mitigation objective, the commentary suggests that the new strategy scenario scores higher overall, but again this is not reflected in the score.	<ul style="list-style-type: none"> • Noted, no change made. • Correct scoring and commentary reflected in mitigation/ enhancement measures and monitoring framework. 	N/A
SEPA	Mitigation and enhancement	Table 8.1.a provides for a reasonably comprehensive programme of mitigation to prevent, reduce or as fully as possible offset the potential for adverse effects. SEPA welcomes the inclusion of “enhancement measures” as part of the suite of mitigation. It would be useful if, in the SEA statement, some commitment was made as to how these measures will be implemented. A simple table explaining when the measures are required, who will be responsible for leading them and the mechanisms by which the measures will be put into place would be a practical means of ensuring that mitigation actions are put into place.	<ul style="list-style-type: none"> • This will tie in with the Implementation and monitoring plans. • Post-adoption statement/ monitoring framework includes an indication of which organisations may be responsible for taking a lead/ role in the delivery of mitigation measures. 	N/A

SNH Issues raised at scoping for addressing				
SNH	Issues raised at scoping	One area commented on at scoping was the need to explore the place of the Strategy in the hierarchy of PPS as per Schedule 3 (1). SNH would suggest that the value of the Environmental Report could be enhanced by developing this area further as part of the adoption process. There are likely to be sectoral plans or policies other than those listed, that the Strategy will seek to influence and at which level the environmental effects should be assessed.	<ul style="list-style-type: none"> The revised strategy and supplementary material will draw the links with other policies and strategies more strongly. Post-adoption statement and monitoring framework considers other relevant PPS and how these may support the implementation of the Strategy. 	N/A
SNH	Issues raised at scoping	The Strategy and SEA should clarify that it is not being regarded as a plan under Habitats Directive Article 6(3), but that subsequent development of these policies will be subject to appropriate assessment.	<ul style="list-style-type: none"> No change made. Environmental Report highlights the need for subsequent related PPS informed by the Strategy should have regard to whether they require Appropriate Assessment under Article 6 of the Habitats Directive. 	N/A
SNH Assessment of significant effects				
SNH	Assessment of significant effects	We (SNH) suggest that the potential minor negative effects identified on the historic environment and landscape are generally overstated. We consider it unlikely that there will be any significant cumulative effects at the national scale arising from increased participation in deer related activities.	Noted, no change made.	N/A
SNH	Assessment of significant effects	It is unlikely that habitat networks would be developed in such a way as to negatively impact on archaeological sites.	Noted, no change made.	N/A
SNH	Assessment of significant	Given that delivering a high quality environment is one of the three pillars of sustainability and the Strategy, SNH would be	Noted, though the assessment was deliberately cautious in its approach	N/A

	effects	concerned if the Strategy were to have on-balance neutral or potentially negative impacts as generally implied. We consider the environmental risks associated with failing to deliver the Strategy or of not recognising a new strategy, as far higher than those potentially arising from implementing the Strategy.	since it cannot be guaranteed that implementation will be as positive as the aspiration intends. A series of implementation plans will facilitate delivery of the strategy.	
SNH	Assessment of significant effects	The potentially positive effects for the environment are generally understated in the Report. In particular the benefits of increased recognition given to public interest in the management of wild deer in the wider countryside, with potentially wide reaching consequences for biodiversity and climate change mitigation.	Noted, though the benefits of public interest have been implicitly rather than explicitly acknowledged.	N/A
SNH	Assessment of significant effects	The Environmental report can at times portray a rather simplistic view of tensions; assuming that economic development is incompatible with natural heritage objectives. For example, some outcomes may have both positive and negative effects on different biodiversity objectives. This simplification is inevitable when assessing the effects of policies at this scale. In practice, we would hope that many issues may be resolved by appropriate implementation. This, however, highlights that the Strategy is perhaps not clear on the mechanisms for resolving conflicts between objectives where these arise. SNH will provide further comment on this issue to DCS in developing the final Strategy.	Providing further clarity on mechanisms for resolving conflicts was identified in the Analysis Report as one of the key themes. This has been addressed in the revised strategy by the inclusion of an action under 6.4.1 to 'establish mechanisms to address conflict' and including 'addressing conflict' in the cross cutting issues of the key issues to address.	N/A
SNH Baseline and key environmental issues				
SNH	Table 2 of Non-technical Summary (and 6.2d of the ER)	Query assessments; under avoiding/ reducing flood risk and reducing the contributions to climate change; the Strategy is presented as having potentially fewer positive impacts than no new strategy – this may just be a presentational issue, but would be a surprising outcome.	<ul style="list-style-type: none"> • Noted, no change made. • Potential significant environmental effects (both positive and negative) of Strategy implementation on flood risk and contributions to climate change will be monitored and incorporated into subsequent t 	N/A

			revisions of the Strategy and implementation plans.	
SNH	Table 2.3a	There are numerous errors in this table, particularly in relation to referencing to Section numbers and headings.	Noted, erratum made.	N/A
SNH	Page 28 section 5.5	Why are UK deer species referred to here?	Noted, no change made (the strategy focuses on the management of the 4 resident species of deer in Scotland).	N/A
SNH	Table 5.5a	Some clarification is needed that the nature conservation/ condition targets do not relate to the 20% coverage figure quoted, but only to SSSIs, SACs, SPAs and Ramsar sites rather than this broader set of designations.	Noted, erratum made.	N/A
SNH	Section 5.5	<p>Comments on coverage of baseline environmental information:</p> <ul style="list-style-type: none"> • Suggest need to give greater recognition to the role of large herbivores in influencing the pattern and structure of vegetation on a large scale as per Annex 1 of the Strategy 1.3. And thereby in mitigating water run-off, flood risk etc. there is a need to stress positive impacts as well as negative. • Suggest impacts on wider-countryside habitats and species could be further developed. There is no systematic survey of habitat condition in the wider countryside, but FCS's New Native Woodland Survey should provide information for all semi-natural woodlands. SNH's Site Condition Monitoring points to the proportions of upland features/ areas affected by grazing and trampling impacts on designated sites – one approach would be to assume that these proportions are replicated in the wider countryside. However, the habitat objectives for the wider countryside are less clearly articulated than those on designated sites, hence although the extrapolation of habitat condition may be valid, it may not be appropriate to assume that all areas should 	<ul style="list-style-type: none"> • There has been an action included (6.4.3) to improve knowledge on optimal grazing regimes (refers to all herbivores). The revised strategy portrays deer as much more an integral part of the biodiversity. • Impacts of deer on wider countryside to be considered in SEA monitoring. 	N/A

		meet these targets.		
SNH	Section 5.5	We suggest the effects of deer fencing on wildfowl are unlikely, therefore suggest this is deleted and replaced with the issue of carcass extraction as a source of carrion for wildlife.	Noted, no change made.	N/A
SNH	Section 5.10	Unclear what is intended by 4th bullet. Does this refer to the effects of deer on vegetation cover and connectivity in mitigating species responses to climate change i.e. indirect via habitat modification?	Noted, no change made.	N/A
SNH	Appendix 3 section 3.2	Much of the relevance of the information in Appendix 3 is not clear or is often not the most relevant information that could be presented. Information on trends of the public taking access and hill walking in particular is available: http://www.snh.org.uk/trends/trends_notes/pdf/Access%20and%20recreation/Recreation%20in%20the%20uplands.pdf It is against such background levels of participation that any increase in access related to promoting deer watching/ participation in stalking must be gauged	<ul style="list-style-type: none"> Information sources notes and incorporated into monitoring framework where appropriate. Monitoring framework identifies other relevant PPS that may provide information to support monitoring of significant environmental effects of Strategy implementation. 	N/A
SNH Future scenarios and future change				
SNH	Figure 6.1a	How has this figure been derived- determined by consultants or the advisory Group> why show unimportant scale if none have been classified as unimportant?	This was the figure that was developed through the Steering Group meeting and the unimportant/important axis is integral to the technique used. No change made.	N/A
SNH	Table 6.2c	Suggest would be useful to reference this table in the strategy (Appendix 3) to highlight new work covered	No change made. However this approach may be incorporated into the annual reporting of performance on the implementation plan.	N/A
SNH	Table 6.2d	Considers that it is unlikely that cumulative impact of increased	Noted, no change made.	N/A

		visitor numbers to the countryside (specific to deer) will be significant.		
SNH	Table 6.2d	Considers it unlikely that habitat networks would be developed in such a way as to negatively affect archaeological sites.	Noted, no change made.	N/A
SNH	Table 6.2d	Considers that conclusions are not entirely transparent- not clear if weighting has been attached to different SEA objectives?	No weightings attached; no change made.	N/A
SNH	Section 6.3 and associated appendices	Considers that alternative approaches is too superficial to be useful- accepts, however, that options are too wide ranging and uncertain to consider at this stage.	No change made.	N/A
SNH Assessment of strategy				
SNH	Table 7.1b	Compatibility outcomes- considers that assessment overstates potentially negative effects if implementation is carried out in a way that promotes sustainability. Needs clarification on how SEA objectives considered- independently or as a whole?- this will effect the way conflicts treated.	A cautious approach was adopted to scoring as there is no guarantee that implementation will be carried out in a way that promotes sustainability, not least because that is open to interpretation. No change made.	N/A
SNH	Tables 7.1b, 7.2a and 7.2c	Suggest that it would have been more helpful to have tables 7.1b, 7.2a and 7.2c in the body of the document as these articulate more clearly the rationale for scoring than the summary tables.	That is why they are provided in the appendices and the summary tables in the main text. No change made.	N/A
SNH	Section 7.3	Suggest it would be helpful to have a list of negative impacts to be considered in subsequent plans in the main body of the document rather than appendices.	<ul style="list-style-type: none"> No change made. List of potential significant negative and positive effects in Table 7.3c. 	N/A
SNH	Monitoring	Sources of information for a number of indicators are unclear: Species adversely affected by deer management Status of carbon sinks in Scotland GHG emissions in the deer sector Status of species likely to be affected by climate change Link if roadside verge to deer	<ul style="list-style-type: none"> A set of indicators, based on the possible indicators in the strategy have been developed and are listed in the monitoring framework. Where possible these have been 	N/A

		What is meant by the status of sporting estates? Also consider indicator relating to the area of countryside open to public is not relevant in the context of current access rights.	linked to existing datasets, where this is not possible and new data is being collated this will be made clear.	
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6. REASONS FOR CHOOSING THE FINALISED VERSION OF THE STRATEGY IN LIGHT OF OTHER REASONABLE ALTERNATIVES CONSIDERED

The assessment of reasonable alternatives considered the 'No New Strategy' scenario vs. the 'New Strategy' (The Strategy) scenario. Although only two alternatives were assessed, the SEA process helped to develop a suite of alternative approaches to deer management that should be used to inform the development of future revisions of the Strategy.

The difference between deer management approaches considered in the New Strategy compared to the No New Strategy were explored by discussing and summarising what is proposed in the New Strategy at the objective and action level and how this differed from current/ existing policy. The implications of these differences, in environmental terms, were explored in the context of the extent to which the alternative approaches worked towards or against achievement of the SEA objectives. This approach identified key environmental strengths and weaknesses of both alternatives. The appraisal of these informed the identification of the environmentally favourable alternative.

The New Strategy alternative was considered to be favourable as it has key strengths in relation to contributing to climate change adaptation, protection and enhancement of human health and protection and enhancement of the Scottish landscape. A key response to consultation on the draft Strategy and the Environmental Report from the statutory consultees was that the assessment of alternatives had been over critical of the New Strategy. They felt that the environmental implications of having no deer management Strategy far outweighed the potential negative environmental effects of implementing the New Strategy. However, a cautious approach was adopted in scoring the assessment as at a strategic level it is not possible to assume that measures will necessarily be implemented in a way that promotes sustainability, however good the intentions, since such an approach is open to interpretation.

7. MONITORING THE SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE STRATEGY

The primary mechanism for monitoring the significant environmental effects of the Strategy will be through the existing channels of communication with Strategy stakeholders including Scottish Natural Heritage and the Forestry Commission Scotland. Following consultation on the Strategy, the proposed indicators have been adjusted and a more comprehensive monitoring framework developed. Where possible, this integrates the monitoring of significant environmental effects required for SEA with monitoring against the aims and objectives of the Strategy and its potential socio-economic effects.

The Strategy will be subject to five yearly reviews and reporting on progress and monitoring outcomes will be delivered annually. This is shown below in Figure 7-1. The SEA indicators and monitoring framework will be used to support the ongoing collation of environmental baseline information. In subsequent revisions of the Strategy, this information will be used to support revisions and updates and potential changes in approach to deer management.

The full monitoring framework is provided as Appendix 1 to this SEA Post-adoption statement. The monitoring framework clearly outlines where there is cross-over/ duplication between monitoring of significant environmental effects and monitoring of the Strategy's performance and socio-economic effects. The monitoring framework will be kept under review in line with reporting on progress of the Strategy and modified if appropriate to be responsive to changing circumstances and/ or refinements/ updates to the Strategy.

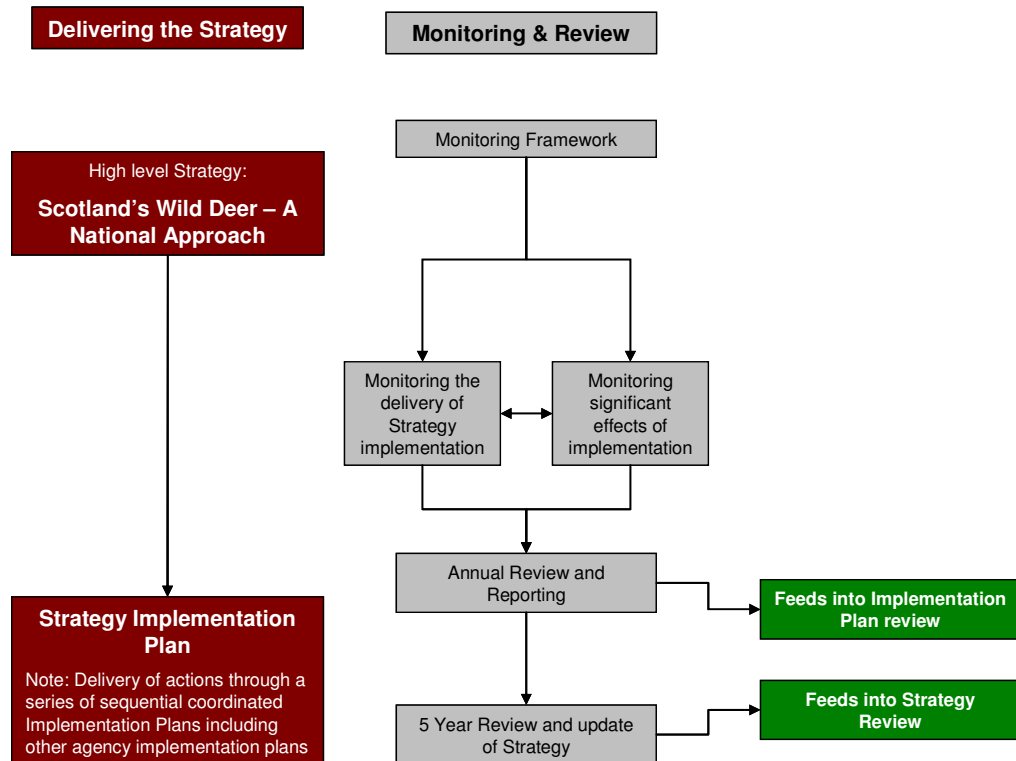


Figure 7-1 Relationship between Strategy delivery and monitoring and review