

## **Strategic Environmental Assessment Statement of the Core Paths Plan**

### **INTRODUCTION**

1. This Strategic Environmental Assessment (SEA) Statement accompanies the completed Core Paths Plan. It records how the SEA has informed development of the Plan, including how opinions expressed on the Environmental Report have been taken into account in finalising the Plan. This Statement is published as the 'Post-Adoption SEA Statement' required by section 18(1)(a)(iii) of the Environmental Assessment (Scotland) Act 2005.
2. The Core Paths Plan sets out the network of core paths 'sufficient to provide reasonable access' as per the Land Reform (Scotland) Act 2003. The Core Paths Plan will help people enjoy and understand the special qualities of the Cairngorms National Park and features a network of paths comprising of a range of path types which offer high quality outdoor access opportunities.
3. The SEA process developed in conjunction with the consultation on the Core Paths Plan has been a key tool in ensuring that the plan as a whole contributes to the effective management pressures on sensitive natural and cultural heritage sites and land management operations, for example by encouraging access away from sensitive sites.

### **STRATEGIC ENVIRONMENTAL ASSESSMENT OF THE CORE PATHS PLAN**

4. The Core Paths Plan 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 Scottish Ministers (Historic Scotland) regarding the scope and level of detail appropriate for the Environmental Report;
  - Preparing an Environmental Report on the likely significant effects of the draft plan on the environment, including consideration of:
    - baseline data relating to the current state of the environment;
    - links between the Plan and other relevant strategies, policies, plans, programmes and environmental protection objectives;
    - existing environmental problems affecting the Cairngorms National Park;
    - 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;
    - management alternatives available within the Plan;

- links between the Plan and other relevant strategies, policies, plans, programmes and environmental protection objectives;
  - monitoring measures to ensure that any unforeseen, environmental effects can be identified and appropriate remedial action taken.
- Public Consultation on the Environmental Report alongside the Draft Core Paths Plan April to June 2008;
  - Taking into account the Environmental Report and the results of consultation in completing the plan;
  - Committing to monitoring the significant environmental effects of implementation of the Plan. This will also allow identification of any significant, unforeseen, adverse environmental effects and appropriate remedial action.

## **HOW ENVIRONMENTAL CONSIDERATIONS HAVE BEEN INTEGRATED INTO THE CORE PATHS PLAN**

5. The four aims of the National Park are:

- To conserve and enhance the natural and cultural heritage of the area;
- To promote sustainable use of natural resources of the area;
- To promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public;
- To promote sustainable economic and social development of the area's communities.

These are reflected in the vision and objectives of the Core Paths Plan. The vision and objectives clearly set out an agenda for the Plan to deliver positive environmental benefits. The special qualities of the Park are closely linked to the natural and cultural heritage of the area. As such many of the objectives, and in particular the first two, provide robust protection to a wide range of environmental interests.

### **Addressing the environmental issues**

6. The Environmental Report identified the key environmental trends and issues affecting the area (Environmental Report, Fig. 5.2). These issues are shown below with an additional column signposting the sections of the plan in which they have been addressed.

### **How the Environmental Report has been taken into account**

- 7. The Environmental Report assessed the vision and objectives for their likely environmental effects. It also assessed each action area network and a brief commentary was provided for each one. As a result of the assessment a number of modifications were made to the Action Area networks. This included some re-alignment and removal of routes if no alternative or mitigation could be found.
- 8. Most of the changes identified were to enhance the positive environmental effects of the Plan – to make the most of the opportunity to contribute

towards the aims of the National Park and the objectives of the Plan. For example, most involved changes to ensure that the natural and cultural heritage would be sufficiently protected or to strengthen positive actions to enhance these resources.

**How comments on the Environmental Report have been taken into account**

9. The Environmental Report was published for public consultation alongside the Draft Cairngorms National Park Plan. The consultation period ran from 1 April to 30 June 2008. The Environmental Report was included in the package of documents sent out to consultees, and to those who requested a copy of the plan, as well as being available to download from the Cairngorms National Park Authority website.
  
10. While 82 responses to the draft plan were received, only three responses (including the Consultation Authorities) responded specifically to the Environmental Report. The comments made in the responses to the Environmental Report are detailed in the table below, with a note on how these have been addressed. Full copies of consultation responses are available on request.

**Fig. 1 How comments on the Environmental Report (ER) have been addressed**

<b>Fig. 1 How comments on the Environmental Report have been addressed</b>		
<b>Consulted</b>	<b>Comment</b>	<b>Modification</b>
Historic Scotland	Change wording in section 10.2 from:  <i>A framework for monitoring the environmental effects of the Core Paths Plan will be developed with the wider development of monitoring for the Outdoor Access Strategy. It is proposed to develop a set of health indicators, together with more detailed performance monitoring, for the Plan. This process will be informed by the consultation on the Draft Core Paths Plan and this Environmental Report.</i>	<i>A framework for monitoring the environmental effects of the Core Paths Plan will be developed with the wider development of monitoring for the 'State of the Park Report these will be supplemented by lower level environmental indicators linked to the Core Paths Plan.</i>
Scottish Environmental Protection Agency (SEPA)	<i>SEPA is satisfied that the assessment of all the routes considered in the plan-making process represents realistic alternatives, however, in line with the Act, SEPA would have</i>	Assessment tables will be available online and be referred to as such in the ER

**Fig. 1 How comments on the Environmental Report have been addressed**

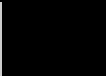
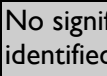
	<i>expected these assessments to have been presented in the ER.</i>	
	<i>Section 4.1 – SEPA notes that this section identifies that the alternative scenarios for developing the Core Paths Plan were considered and that different objectives to select the core paths network were developed as well as changing the geography for selection of the core paths network to the Action Areas. However, the section does not outline whether alternatives were considered in the form of the different paths that could have been included in the Core Paths Plan.</i>	Included a statement indicating that all core proposals were assessed throughout the process but only those appearing in the Plan have been published.
	<i>Assessment of Area Network Proposals (section 9) – SEPA considers that impacts on waste and pollution should have considered potential increased negative impacts of litter and foul effluent resulting from increased use. Proposed mitigation therefore does not address these potential negative impacts.</i>	Adequately covered by Outdoor Access Strategy policy 8.
	<i>Future Development of Core Paths Plan and SEA – SEPA highlighted above that there may be an increase in littering in areas as a result of their promotion in the plan. In any revised version of the ER, or post adoption statement, SEPA would therefore welcome an amendment to Annex 4 to highlight that this might be an issue and a section added in on mitigation.</i>	The Core Paths Plan is not a promotional document and, as above, the promotion of access is governed by Outdoor Access Strategy policy 8 which adequately covers issues to do with littering. An amendment to Annex 4 is not required as current SEA criteria covers littering (see figure 6.2 page 36 of ER)
Scottish Natural Heritage	<i>Section 4.11, fig 4.2, 4.12 and 9.1 – it would be very useful to explain more clearly exactly what aspects of Core Paths you have assessed. There could be range of different effects from designating; constructing; repairing ; promoting</i>	Alter text to state that it is the designation of the area networks that has been assessed.

**Fig. 1 How comments on the Environmental Report have been addressed**

	<i>and/or people using core paths. We are not sure which of these have been assessed in this Report.</i>	
	<i>Figure 5.1 key baseline facts – We are disappointed that you have not taken on board our advice to include key baseline facts about the Parks distinctive landscapes and their integral part to the outstanding national importance and value of the Park. The Water section might usefully mention that there are 3 river SAC systems in the National Park</i>	Alter Earth Heritage Landforms and Landscapes box on page 26 of ER to include a new bullet on wilderness quality. Include new bullet on water box on page 27 stating 3 SAC systems.
	<i>Figure 6.2 – Third criterion under objective 2 refers to species but should say habitats.</i>	Make correction.
	<i>Annex 4 Rothiemurchus and Glenmore SEA Objective 2 – The rationale is incorrect. The fact that LBS129 lies alongside the road does not mean its construction is having little effect on the adjacent sites. Construction of route involves loss of qualifying habitat.</i>	Alter wording on pages 88 and 89 of Annex 4 to state that LBS129 will have an effect on designated features.
	<i>Figure 10.1 SEA Indicators and targets SEA objective 4 – We recommend that the wording of the target is linked more closely to the requirement under the Water Framework Directive for all water bodies to meet “Good Ecological Status” by 2015.</i>	Reword target – No deterioration in current water body status.
	<i>Figure 10.1 SEA Indicators and targets SEA Objective 6 – We recommend adding a target to cover no loss in experiences of wilderness.</i>	New target – Increase the value of the wilderness indicator in accordance with CNPA/SNH methodology.
	<i>Figure 10.1 SEA Indicators and targets SEA Objective 9 – Please note that in some designated sites using local materials won on site may not be possible with adverse effects. You could address issue by adding following text to target- unless this would damage the notified interests on designated sites.</i>	Alter existing target to state - unless this would damage the notified interests on designated sites.

**EFFECTS ON NATURA INTERESTS**

11. The Cairngorms National Park contains 32 sites designated as either Special Areas of Conservation (SAC) or Special Protection Areas (SPA) (see Annex I) under the Conservation (Natural Habitats &c.) Regulations 1994. There is an obligation in law to prevent any activities being undertaken which are likely to have an adverse impact on the qualifying feature of interest, unless the activity is in the overriding public interest and there is no alternative available.
  
12. The Draft Core Paths Plan was subject to the requirements of Article 6 of the Habitats Directive. This requirement is that plans likely to have a significant effect on Natura 2000 sites – Special Protection Areas (SPA's) or Special Areas of Conservation (SAC's) – can only be approved after an appropriate assessment of the proposal has been undertaken.
  
13. The assessment considered the likely impacts of the proposed core paths within the Draft Core Paths Plan against the qualifying interests and conservation of the Natura 2000 sites (see Figure 2 below). This assessment concludes that with appropriate safeguarding and mitigation the Core Paths Plan will not adversely affect the integrity of any Natura sites in the Cairngorms National Park.

<b>Figure 2- Significant effects to Natura sites</b>										
<b>Key:</b>	 Significant effect identified				 No significant effect identified					
<b>Natura Sites</b>		<b>Area Networks</b>								
Special Areas of Conservation (SACs)		Central Cairngorms	Eastern Cairngorms	Upper Deeside	Upper Donside	Glenlivet and Tomintoul	Lower Badenoch and Strathspey	Upper Badenoch and Strathspey	Glenmore and Rothiemurchus	River Spey
Ballochbuie										
Cairngorms										
Coyles of Muick										
Creag nan Gamhainn										
Dinnet Oakwood										
Glen Tanar										
Green Hill of Strathdon										
Ladder Hills										

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Morrone Birkwood									
Morven and Mullachdubh									
River Dee									
Muir of Dinnet									
River Spey – Insh Marshes									
River Spey									
River South Esk									
Kinveachy Forest									
Dinnet Oakwood									
Special Protection Areas (SPAs)									
Ballochbuie									
Caenlochan									
Cairngorms									
Glen Tanar									
Lochnagar									
Muir of Dinnet									
River Spey – Insh Marshes									
Abernethy Forest									
Anagach Woods									
Craigmore Wood									
Kinveachy Forest									

**REASONS FOR COMPLETING THE PLAN IN ITS FINAL FORM**

14. Consideration of the environmental effects of the plan has been integral to the process of developing the Core Path Plan. The assessment has shown that the Plan as a whole is unlikely to have an adverse impact on the environment, and although many potential effects remain uncertain at this strategic level, the Plan is likely to have a positive effect on the environmental resources in the area. Assessment has led to some changes and amendments, to ensure the plan includes mitigation of potential adverse effects and to maximise the positive effects. Based on the assessment and the changes made, the completed plan offers an effective way to meet both the aims of the Park and the vision and objectives of the Plan, including measures to minimise adverse environmental effects and to actively seek environmental enhancement.

**MONITORING THE SIGNIFICANT ENVIRONMENTAL EFFECTS OF IMPLEMENTING THE CORE PATHS PLAN**

15. The Core Paths Plan sits within the framework of the Cairngorms National Park Plan which is also subject to the SEA process. Therefore some of the significant environmental effects will form part of the approach to monitoring the State of the Park (see Section 8 of the Cairngorms National Park Plan). A further sub-set of indicators are required to monitor those SEA objectives

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significantly affected by the Core Paths Plan. The two principles which guide the approach to monitoring are:

- The need for a simple but robust approach that is easy to use;
- The need for a collective approach amongst all partners involved in implementing the Plan.

Both the policies and the priorities have a significant effect on the SEA objectives 7 (responsible access for all) and 11 (maintaining a sustainable and healthy population). Therefore the focus for the monitoring of the significant environmental effects of the Core Paths Plan should focus on these two SEA objectives. The Cairngorms National Park Authority has lead a process with partner organisations to identify appropriate indicators and these are shown below.

- Number of complaints made to the Local Outdoor Access Forum: and
- Number of health walk groups operating across the Cairngorms National Park.



**ANNEX I: NATURA SITES – Special Areas of Conservation and Special Protection Areas in the Cairngorms National Park**

Special Areas of Conservation

Ballochbuie  
Cairngorms  
Coyles of Muick  
Creag nan Gamhainn  
Dinnet Oakwood  
Green Hill of Strathdon  
Insh Marshes  
Ladder Hills  
Morrone Birkwood  
Morven and Mullachdubh  
Muir of Dinnet  
Glen Tanar  
Caenlochan  
Creag Meagaidh  
Drumochter Hills  
Kinveachy Forest  
Monadhliath  
River South Esk  
River Spey

Special Protection Areas

Abernethy Forest  
Ballochbuie  
Craigmore Wood  
Cairngorms  
Loch Vaa  
Lochnagar  
Muir of Dinnet  
River Spey Insh Marshes  
Glen Tanar  
Caenlochan  
Creag Meagaidh  
Drumochter Hills  
Kinveachy Forest