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STRATEGY

Cairngorm and Glenmore  
Strategy

**Strategic Environmental Assessment  
Environmental Report**

December 2015

Appendix 5: Consultation Responses

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Table 25 Responses to consultation on the Scoping Report and the actions taken in response.

Consultation Authority	Section of Scoping Report	Comment	Response of CNPA	Change to SEA
Historic Environment Scotland	General	Note that the historic environment (under landscape and cultural heritage) has been scoped into the assessment.	Comment noted.	No change to SEA.
	General	Content with the 6 week timescale for consultation in the Environment Report.	Comment noted.	No change to SEA.
	Table 4: Proposed SEA objectives  Objective 7	<p>The emphasis in SEA objective 7 (landscape and cultural heritage) is solely on landscape; whilst landscape can encompass historic environment.</p> <p>HES recommend amending this objective to include reference to cultural heritage including the historic environment.</p> <p>Alternatively, CNPA could consider having two objectives for this topic, one to address landscape, the other to address cultural heritage</p>	The CNPA have considered the comment and decided to alter the wording of Objective 7 and one of its sub-objectives.	<p>Change wording of Objective 7 to:</p> <p>Protect and enhance the character, diversity and special qualities of the National Park's landscape <b>and cultural and historic heritage</b></p> <p>Change wording of sub-objective to:</p> <p>Value, protect and enhance <b>the</b> historic and cultural <b>environment and its assets.</b></p>
	Table 4: Proposed SEA objectives  Objectives 8b  Figure 3:	Some of the sub-objectives of Objective 8b have interrelationships with the historic environment, and they are compatible (marked as no relationship on page 26) with SEA	The CNPA have agrees with the comment and have made amendments to Table 4 and Figure 3.	<p>Add:</p> <p><b>Landscape and Cultural Heritage</b></p> <p>To the Inter-relationships</p>

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	Compatibility assessment between SEA objectives	objective 7's sub-objectives for the historic environment. However, these links have not been recognised in Table 4 or the compatibility assessment (Figure 3).		column for Objective 8b.  Compatibility between objectives 7 and 8b noted in Figure 3 of the Environmental Report.
	Figure 3: Compatibility assessment between SEA objectives	An interrelationship between cultural heritage and Objective 1b is identified in Table 4, but this is not reflected in the compatibility assessment. Adaptation to climate change is a key issue for the historic environment, and consequently I agree that there is an interrelationship and also a compatibility between Objective 1b and Objective 7.	The CNPA have agrees with the comment and have made the suggested amendments to Figure 4.	Compatibility between objectives 1b and 7 noted in Figure 3 of the Environmental Report.
	Table 6 assessment key	The definition for significant negative effect is that the Option would have a major adverse effect as it would substantially exacerbate existing problems. I recommend amending this definition to recognise that negative effects which are not related to existing problems can also arise.	The CNPA have agrees with the comment and have made the suggested amendments to Figure 4.	Amend the wording to the definition of major adverse effects in Table 26 of the Environmental Report (page 228) to:  The Option would have a major adverse effect as it would <b>create significant new problems</b> or substantially exacerbate existing problems. Consider exclusion of option.

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				SIGNIFICANT.
	Appendix 2: Environmental Baseline; Topic 7	The baseline information provided for the historic environment focuses on historic landscape. Other than a detailed description of Cairngorm Lodge, there is little reference to the number of other undesignated heritage assets which are found in the area. I recommend that this data (available from <a href="http://www.pastmap.org.uk">www.pastmap.org.uk</a> ) should be analysed and form part of the baseline for the assessment.	The CNPA agrees with the comment and have made amendments to Appendix 2, Topic 7 of the Environmental Report.	<p>A section outlining the National Monuments Record sites within the Cairngorm and Glenmore area has been added to Appendix 2, Topic 7 of the Environmental Report (pages 167 and 171).</p> <p>The following text has been added to the Landscape and Cultural Heritage Section of Table 2 (page 15):</p> <p><b>There are 54 National Monument Records within the Cairngorm and Glenmore area.</b></p>
<b>Scottish Environment Protection Agency</b>	General	SEPA consider that the Scoping Report provides good clear information on the proposed scope and level of detail of assessment and we are content with the proposed consultation period. As a result, in this case, we have no detailed advice to provide above that already included in Standing Advice for Responsible Authorities on Strategic Environmental Assessment (SEA)	Comment noted.	No change to SEA.

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		Scoping Consultations.		
Scottish Natural Heritage	General	Scoping report is comprehensive.	Comment noted.	No change to SEA.
	General	SNH are content with the proposed scope, SEA objectives and assessment framework.	Comment noted.	No change to SEA.
	General	Content with the 6 week timescale for consultation in the Environment Report.	Comment noted.	No change to SEA.
	Table 2: Summary of baseline information and main issues, Material Assets, p.13	In relation to the geomorphological assets of the area, the 2 <sup>nd</sup> key message in the Appendix on p. 98 presents a more relevant summary than the text in Table 2 about the GCR site and detailed mapping.	The CNPA agrees with the comment and have made the suggested amendments to Table 2.	Amend the wording of the Material Assets section of Table 2 of the Environmental Report (page 13) to:  The Strategy's area falls within the Cairngorms Geological Conservation Review (GCR) site. <b>The Strategy's area falls within the Cairngorms GCR site which is listed for its exceptional assemblage of pre-glacial, glacial, glaciofluvial and periglacial features.</b>
	Table 2: Summary of baseline information and main issues, Biodiversity, Fauna	SSSIs are designated for 'notified interests'; and Natura sites for 'qualifying features' (not notifiable features).	The CNPA have agrees with the comment and have made the suggested amendments to Appendix 2.	Corrections made to relevant text in Table 2 (page 14) and Appendix 2 (pages 115 to 140).

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	and Flora, p. 13-14  Appendix 2; Topic 6: Biodiversity, Fauna and Flora			
	Table 2: Summary of baseline information and main issues, p. 15	<p>It would be worth stating in either the landscape or population sections that the strategy area contains:</p> <ul style="list-style-type: none"> <li>➤ the most iconic view in the National Park (the Northern Corries behind Loch Morlich); and</li> <li>➤ the largest and most popular bathing beach in the National Park</li> </ul>	<p>The CNPA have agrees with the comment and have made the suggested amendments to Table 2.</p>	<p>The following text has been added to the Landscape and Cultural Heritage section of Table 2 of the Environmental Report (page 15):</p> <p><b>The Strategy area contains the most iconic view in the National Park (the Northern Corries behind Loch Morlich).</b></p> <p>The following text has been added to the Population and Human Health section of Table 2 of the Environmental Report (page 16):</p> <p><b>The Strategy area contains the largest and most popular bathing beach in the National Park.</b></p> <p>Add the following text to page 193 of the Environmental</p>

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				<p>Report:</p> <p><b>The area contains numerous attractions including a ski centre, access to the Cairngorm Mountains and the largest and most popular bathing beach in the National Park.</b></p>
	<p>Table 2: Summary of baseline information and main issues, Population and Human Health, p. 16</p>	<p>Worth explicitly stating that the population of &gt;1000 quoted here relates to an area considerably larger than the strategy area. An approximate estimate of the resident population within the strategy area would put this information in context.</p>	<p>The CNPA have agrees with the comment and have made the suggested amendments to Table 2 and Appendix 2.</p>	<p>Amend the wording of the Population and Human Health section of Table 2 of the Environmental Report (page 16) to:</p> <p>In 2013 the estimated population of the <del>Glenmore area</del> <b>Data Zone S01003751</b> was 1,089, with 575 males and 514 females. <b>This population includes part of Aviemore, which is not covered by the Strategy.</b></p> <p>Amend the wording on page 184 of the Environmental Report as follows:</p> <p>In 2013 the estimated</p>

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				<p>population of the <del>Glenmore</del> area <b>Data Zone S01003751</b> was 1,089, with 575 males and 514 females. <b>This population includes part of Aviemore, which is not covered by the Strategy. Based on average household size and the number of properties within the Cairngorm and Glenmore area itself, only around 26 of these are likely to live within the area actually covered by the Strategy. This is a very rough figure however, which is also likely to be an underestimate, as it does not account for the residential accommodation offered by outdoor centres such as Glenmore Lodge.</b></p> <p>Add following text to the Population and Human Health section of Table 2 of the Environmental Report (page</p>

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				<p>16) to:</p> <p><b>Based on average household size and the number of properties within the Cairngorm and Glenmore area itself, only around 26 of these are likely to live within the area actually covered by the Strategy.</b></p>
	Table 4: Proposed SEA Objectives	The sub-objectives are comprehensive; you could reduce the number by focussing on those most relevant to the geographic and subject scope of this SEA.	<p>The CNPA acknowledge the comment, but would like to draw SNH's attention to the following paragraph on page 19 of the Scoping Report and page 18 of the Environmental Report:</p> <p><i>"It is important that the assessment process is proportional, practical and manageable. Consequently, the assessment process will utilise the 'main' SEA Objectives, but take account of the SEA Sub-Objectives... It should also be noted that not all SEA Sub-Objectives will not be relevant to every aspect of the Strategy. Therefore, in the interest of proportionality, where they are not</i></p>	No change to SEA.

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			<p><i>relevant, they will not be considered as part of the assessment process.”</i></p> <p>It is not therefore considered that a change to the objectives is needed.</p>	
	<p>Appendix 2, Topic 6: Biodiversity, Fauna and Flora, p. 99-100</p>	<p>Whilst the Cairngorms NNR is still technically a declared NNR, it is under review and not managed or promoted as an NNR. We therefore recommend excluding it from this section.</p>	<p>The CNPA note the comment; however owing to the Cairngorms NNR’s status as a declared NNR have decided to retain reference to it in the Baseline information for the Environmental Report. However, descriptive text relating to the NNR has been removed and additional text has been added to clarify its status.</p>	<p>Amend the following paragraph from page 113 of the Environmental Report to:</p> <p>There are 4 NNRs (<b>Table 12 and Error! Reference source not found.</b>) in close proximity to the Cairngorm and Glenmore Area, which cover a combined area of around 448 km<sup>2</sup>. <del>Individually, they vary considerably in size and at around 25,964 ha,</del> Cairngorms NNR is currently the largest NNR in the UK and one of the largest nature reserves in Western Europe.</p> <p>Amend the following paragraph from page 113 of the Environmental Report to:</p> <p>The NNRs are run by a range of organisations. For example,</p>

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				<p>most of the Abernethy are managed as part of RSPB reserves., while the Cairngorms NNR is owned by 5 separate landowners, including the RSPB, National Trust and SNH.</p> <p>Add the following footnote to the NNR table on page 114 of the Environmental Report:</p> <p><b>While the Cairngorms NNR is technically a declared NNR, it is under review and not managed or promoted as an NNR.</b></p>
	Appendix 2, p. 137	The various causes of the decline in the freshwater pearl mussel qualifying feature of the River Spey SAC are currently under investigation by SEPA and SNH. At this stage it is not possible to identify the action needed to remedy the situation as definitively as stated in the final sentence.	The CNPA have agrees with the comment and have made the suggested amendments to the relevant text.	<p>Amend text on page 152 of the Environmental Report to:</p> <p>A recent survey of FWPM sites in the River Spey highlighted a 50% decline in the population (Sime, 2014), <b>meaning the status of FWPM in the River Spey SAC is currently classified as unfavourable and declining. The</b> reasons for</p>

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				<p>this are...</p> <p>Delete the final paragraph as follows:</p> <p><del>The status of FWPM in the Spey is currently classified as unfavourable and declining, the status will not be improved unless there is less abstraction and nutrient input from sewage and agriculture.</del></p>