

Cairngorms National Park Partnership Plan  
2017-2022

**Strategic Environmental Assessment**

**Environmental Report**

Appendix 5: Consultation Responses

June 2016

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## Appendix 5: Consultation Responses

Table 42 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
<b>Historic Environment Scotland</b>	General	It is HES' understanding that the Cairngorms National Park Partnership Plan 2017 – 2022 will be the management plan for the Cairngorms National Park, setting out strategic direction and priorities.	Comment noted.	No change to the SEA.
		HES note that the historic environment has been scoped into the assessment.	Comment noted.	No change to the SEA.
		On the basis of the information provided, HES is content with the approach and satisfied with the scope and level of detail proposed for the assessment.	Comment noted.	No change to the SEA.
	Consultation / Next Steps	The Next Steps section indicates that there will be a consultation period of six weeks for the draft Environmental Report, and HES is content with this timescale.	Comment noted.	No change to the SEA.
<b>Scottish Environment Protection Agency</b>	General	Generally, the scoping report provides clear and detailed information on the proposed scope and level of detail of the assessment and covers most of the aspects that	Comment noted.	No change to the SEA.

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		SEPA would wish to see addressed at this stage.		
	Policy Context Appendix 1	SEPA consider that the PPS listed in Appendix 1 provides a good start at providing a background framework to the development of the plan.	Comment noted.	No change to the SEA.
		Some of the PPS included have themselves been subject to SEA. Where this is the case you may find it useful to prepare a summary of the key SEA findings that may be relevant to the Cairngorms National Park Partnership Plan 2017 – 2022 (NPPP). This may assist you with data sources and environmental baseline information and also ensure the current SEA picks up environmental issues or mitigation actions which may have been identified elsewhere.	Information from the SEA's of PPS listed in Appendix 1 has been used to inform the SEA's environmental baseline where relevant. These documents will continue to play a part in the assessment.	No change to the SEA.
	Baseline	Table 2 provides a good summary of baseline data and the aspects of the environment where we have an interest.	Comment noted.	No change to the SEA.
	Environmental Baseline Appendix 2	With regards to flooding issues, page 81 of the scoping report states that “while all of the National Park’s rivers	The CNPA welcomes the comment and proposes a change to address the identified issue.	Amend paragraph on page 81 of the Scoping Report and 103 of the Environmental Report

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		<p>and watercourses have the potential to flood to some degree, most do not cause great concern as they are in areas or of a magnitude that is unlikely to cause significant damage to property or risk to life".</p> <p>Although page 81 goes on to highlight the risk in populated areas along the Spey, Dee, and Don and from surface water, we would recommend that the potential flood risk from small watercourses is also highlighted. Small watercourses are often poorly understood with respect to the severity of the flood hazard that can be generated on a catchment of this scale.</p>		<p>as follows:</p> <p><del>While</del> All of the National Park's rivers and watercourses have the potential to flood to some degree (<b>Figure 29</b>);. Most <del>do not cause great concern, as they are in areas or of a magnitude that is unlikely to cause significant damage to property or risk to life. However, the pattern of settlement in the National Park is now</del> <b>is generated</b> along the <b>National Park's</b> main straths and glens, <del>and so</del> <b>as</b> when the rivers and tributaries that flow along these, namely the Spey, Dee and Don, break their banks, they often result in economic, and occasionally human, cost. <b>Small watercourses also represent a risk but are often poorly understood with respect to the severity of the flood hazard that can be generated on a catchment</b></p>

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				<p><b>scale.</b> Furthermore, in some areas surface water flooding, which can arise for a number of reasons, is a significant risk.</p>
		<p>SEPA welcome the inclusion of historical flood information for the main river catchments. If required SEPA's local flood risk team can provide further historical flood risk information for specific areas if we have the information available.</p>	<p>CNPA welcome the comment and have added additional information acquired from SEPA covering the flooding that occurred in December 2015 and January 2016 in the Spey, Dee and Don catchment areas.</p>	<p>Changes are too substantial and widely distributed to outline <i>verbatim</i> within the table. See pages 104 to 111 of the Environmental report.</p>
		<p>It is useful to include information on the Potentially Vulnerable Areas (PVAs) within the Scoping Report. However with reference to the River Spey PVAs we are unclear as to why the Dalwhinnie PVA has been highlighted as being particularly significant for influencing the annual cost of damage in the Spey catchment. It may be useful to provide more detailed information if a particular PVA is of significance.</p>	<p>The figure for Dalwhinnie has been highlighted to demonstrate that damage by river flooding does not significantly affect all PVAs and that Dalwhinnie is an exceptional within the Spey's catchment area within the National Park on the basis that 100% of damage is caused in this way. In order to more clearly demonstrate this, CNPA agree with SEPA's proposal to provide more detailed information on PVAs and therefore has made numerous updates to the baseline</p>	<p>Changes are too substantial to outline <i>verbatim</i> within the table; however they include:</p> <ul style="list-style-type: none"> <li>➤ Maps of PVAs and catchment areas; and</li> <li>➤ Graphics showing the relative cost of damage within individual PVAs, catchment areas and the National Park as a whole.</li> </ul> <p>See pages 104 to 111 of the Environmental report.</p>

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			information contained within the Environmental Report.	
		SEPA consider that the environmental problems described highlight the main issues of relevance for the SEA topics within our remit.	Comment noted.	No change to the SEA.
	Methodology Alternative Plan Scenarios	SEPA note and welcome that during the development of the NPPP alternatives will be considered and that reasonable alternatives identified during the preparation of the plan will be assessed as part of the SEA process. SEPA note the findings of the assessment will inform the choice of the preferred option and will be documented in the Environmental Report.	Comment noted.	No change to the SEA.
	Scoping of SEA Topics	SEPA agree that in this instance all environmental topics should be scoped into the assessment, as detailed in Table 3.	Comment noted.	No change to the SEA.
	Methodology Proposed SEA Objectives	SEPA support the proposal to use the SEA objectives as assessment tools as they allow a systematic, rigorous and consistent framework with which to assess environmental effects.	Comment noted.	No change to the SEA.

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	Methodology Proposed Assessment Framework	SEPA welcome the proposed assessment matrix in Table 5. It will help to fully explain the rationale behind the assessment results and will give the opportunity for transparency and background understanding to the scores given.	Comment noted.	No change to the SEA.
	Methodology	Where it is expected that other plans, programmes or strategies are better placed to undertake more detailed assessment of environmental effects this should be clearly set out in the Environmental Report.	This approach to the PPS has been integrated into the assessment matrices in Appendix 7.	No change to the SEA.
		SEPA would expect all aspects of the PPS which could have significant effects to be assessed.	This approach to the PPS has been integrated into the assessment matrices in Appendix 7.	No change to the SEA.
	Methodology	When it comes to setting out the results of the assessment in the Environmental Report please provide enough information to clearly justify the reasons for each of the assessments presented. It would also be helpful to set out assumptions that are made during the assessment and difficulties and limitations encountered.	This information will be presented in the 'Nature of Effect' column of the assessment matrix.	No change to the SEA.

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	Methodology Table 6	SEPA are content with the proposed detailed assessment matrix and particularly welcome the commentary box to fully explain the rationale behind the assessment results. We also welcome the link between effects and mitigation / enhancement measures in the proposed assessment framework and the consideration of mitigation of impacts.	Comment noted.	No change to the SEA.
	Methodology Proposed Objectives	SEPA are generally content with the proposed SEA objectives to be used in the assessment.	Comment noted.	No change to the SEA.
		SEPA do have a comment on the sub-objective encouraging the restoration of a natural flood regime within SEA objective 3a Reduce flood risk in Table 4. While we agree in principle that natural flood management can have benefits we would caution that any proposals for natural flood management practices are carefully considered to ensure that they are appropriate and does not increase flood risk elsewhere.	Comment noted. The CNPA will consider this issue when assessing the NPPP's options.	No change to the SEA.

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	Methodology	SEPA would encourage you to use the assessment as a way to improve the environmental performance of individual aspects of the final option. One of the most important ways to mitigate significant environmental effects identified through the assessment is to make changes to the plan itself so that significant effects are avoided. The Environmental Report should therefore identify any changes made to the plan as a result of the SEA.	The CNPA note and agree with the comment and will include a table of changes to the NPPP as a result of the SEA in the Environmental Report.	Add Table 7 (page 44) to the Environmental Assessment section of the Environmental Report.
		SEPA welcome the recognition on page 36 that additional mitigation may be required even where positive effects are identified, to strengthen the impact of intervention.	Comment noted.	No change to the SEA.
		Where the mitigation proposed does not relate to modification to the plan itself then it would be extremely helpful to set out the proposed mitigation measures in a way that clearly identifies: (1) the measures required, (2) when they would be required and (3) who will be required to implement them.	The CNPA will include a summary of the mitigation required, including timescales and responsibilities, in the Environmental Report.	Add Table 9 (page 50) to the Environmental Assessment section of the Environmental Report.

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	Monitoring	It is noted that proposals for monitoring indicators will be developed iteratively during the assessment of the draft NPPP and confirmed in the finalised NPPP. Early consideration to the monitoring approach particularly in the choice of indicators is welcomed. It would be helpful if the Environmental Report included a description of the measures envisaged to monitor the significant environmental effects of the plan.	The CNPA agree with the comment and have included a table in the Monitoring section of the Environmental Report.	Add Table 10 (page 58) to the Monitoring section of the Environmental Report.
	Consultation / Next Steps	SEPA are satisfied with the proposal for a six week consultation period for the Environmental Report.	Comment noted.	No change to the SEA.
	General	SEPA would find it helpful if the Environmental Report included a summary of the scoping outcomes and how comments from the Consultation Authorities were taken into account.	The CNPA agree; you are reading the summary.	Create Appendix 5: Consultation Responses in the Environmental Report.
Scottish Natural Heritage	General	Scoping report is comprehensive.	Comment noted.	No change to the SEA.
		Content with the proposed scope, SEA objectives and assessment framework.	Comment noted.	No change to the SEA.

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		The proposed 6 week consultation period for the Environmental Report is fine.	Comment noted.	No change to the SEA.
	Table 4, Proposed SEA Objectives 1a, 1b, 3a	<p>SNH recommend expanding to the lists of proposed SEA criteria for Objectives 1a Reduce Greenhouse gas emissions, 1b Increase resilience to the effects of climate change, and 3a Reduce flood risk, so that they cover the contribution of land use and habitats as well as built development.</p> <p>Potential additional criteria might include:</p> <ul style="list-style-type: none"> <li>➤ 1a Avoid erosion and support restoration of peat and carbon rich soils</li> <li>➤ 1a Minimise carbon emissions from land use (e.g. muirburn)</li> <li>➤ 1a Expand woodland cover (to increase carbon sequestration)</li> <li>➤ 1b Enhance habitat connectivity and species diversity</li> <li>➤ 3a Promote land uses and habitat changes that will help to decrease run-off, stabilise slopes, and attenuate flows.</li> </ul>	<p>The CNPA welcomes the comment, but does not consider objectives 1a and 1b to be the most appropriate place for any amendments. The SEA strongly recognises the interrelationships that exist between topics and that Climatic factors have relationship with most. It is therefore considered that any amendments are best placed in under other topics.</p> <p>The CNPA considers that the suggested sub-objective to “Avoid erosion and support restoration of peat and carbon rich soils” is mostly covered by the following sub-objectives to Objective 4:</p> <ul style="list-style-type: none"> <li>➤ Maintain or improve the carbon storage capacity of peat and soils.</li> <li>➤ Minimise soil erosion.</li> </ul> <p>However, the CNPA does not</p>	<p>Amend the sub-objective to Objective 4 as follows:</p> <ul style="list-style-type: none"> <li>➤ Maintain, <b>restore</b> or improve the carbon storage capacity of peat and soils.</li> </ul> <p>Add the following sub-objective to Objective 4:</p> <ul style="list-style-type: none"> <li>➤ <b>Minimise carbon emissions from land use (e.g. muirburn).</b></li> </ul> <p>Amend the sub-objective to Objective 6b as follows:</p> <ul style="list-style-type: none"> <li>➤ Maintain or improve the <del>carbon storage</del> capacity of woodland <b>to sequester and store carbon.</b></li> </ul> <p>Add the following sub-objective to Objective 3a:</p>

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			<p>consider that the ‘restoration of peat and carbon rich soils’ has been fully covered and therefore proposes an amendment. Carbon emissions from land use are covered by Topic 4: Soil. However, a sub-objective does not exist to deal with it. The addition of the suggested sub-objective to Objective 4, rather than 1a has therefore been proposed.</p> <p>It is considered that the suggested sub-objective to “Expand woodland cover (to increase carbon sequestration)” would be best incorporated into the first sub-objective of Objective 6b.</p> <p>It is considered that the suggested sub-objective to “Enhance habitat connectivity and species diversity” is fully covered by Objective 6a Value, conserve and enhance biodiversity, distinctive native species and habitats and therefore no changes are needed.</p>	<p>➤ <b>Promote land uses and habitat changes that will help to decrease run-off, stabilise slopes, and attenuate flows.</b></p>

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			The CNPA support the addition of the suggested sub-objective to “Promote land uses and habitat changes that will help to decrease run-off, stabilise slopes, and attenuate flows”.	
	Table 4, Proposed SEA Objective 6a	SNH recommend adding a criterion that seeks to avoid the introduction and spread of invasive non-native species and tree diseases.	The CNPA agrees with the suggestion.	Add the following sub-objective to Objective 6a: ➤ <b>Avoid the introduction and spread of invasive non-native species and tree diseases.</b>
	Table 4, Proposed SEA Objective 7	SNH recommend adding a criterion seeking to protect and enhance the Park’s special landscape qualities.	The CNPA agrees with the suggestion.	Add the following sub-objective to Objective 7: ➤ <b>Protect and enhance the National Park’s special landscape qualities.</b>
	Appendix 2: Environmental Baseline Topic 1: Climatic Factors	It may be worth referring to the various sources of carbon emissions associated with land use e.g. erosion of peat and carbon rich soils; muirburn.	These matters are already covered under Topic 4: Soil. The interrelationship between the Climatic Factors and Soil topics is recognised throughout the SEA.	No change to the SEA.
	Appendix 2: Environmental Baseline	Dinnet Oakwood is no longer managed or promoted as an NNR.	CNPA welcomes the comment and proposes the following change.	Amend footnote 10 (page 143) of the Environmental Report to:

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	Topic 6: Biodiversity, Fauna and Flora			“While the Cairngorms NNR, <b>Dinnet Oakwood NNR</b> and Morrone Birkwood NNR are technically declared NNRs (see <b>Table 12</b> ), they are under review and not managed or promoted as NNRs.”
		Tables 13 & 14. For the purposes of reporting to Scottish Government, notified and qualifying features in ‘unfavourable recovering’ condition are classified as ‘favourable’ rather than ‘unfavourable’ (it can take many years of positive management for habitats and species to recover). It would be helpful to use the same approach in these tables.	The CNPA welcomes the comment and proposes the following changes.	The latest assessed condition of each interest or qualifying feature for the sites listed in Tables 14 of the Scoping has been provided in the Environmental Report. In order to keep the data manageable Table 14 has been split into two, one covering SACs and the other SPAs (Tables 18 and 19 of the Environmental Report).
		We recommend identifying that, across all the unfavourable features on designated sites in the Park, the two main pressures leading to unfavourable status are over-grazing and inappropriate burning. A wide variety of other pressures are	The CNPA welcomes the comment and proposes the following changes.	The identified pressures for each interest or qualifying feature of have been provided in Tables 17, 18 and 19 of the Environmental Report.

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		affecting smaller numbers of features and sites.		
		Table 16 It would be worth identifying invasive non-natives and tree diseases as issues affecting woodlands in the Park.	The CNPA welcomes the comment and agrees that the lack of data on invasive non-natives and tree diseases represents a gap in the information presented within the Scoping Report. This comment has also drawn the CNPA's attention to the fact that there are other non-native species, diseases and pathogens which do not relate to woodlands that should also be covered. The CNPA do not therefore propose a change to Table 16 (now Table 21 of the Environmental Report) but instead have decided that a more comprehensive section on biosecurity is required.	A section titled 'Biosecurity' has been added to Topic 6: Biodiversity, Fauna and Flora (pages 212 – 213) of the Environmental Report.