

Cairngorms National Park Partnership Plan
2017-2022

**Final Strategic Environmental Assessment
Environmental Report**

Appendix 5: Consultation Responses

April 2017

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Appendix 5: Consultation Responses

Scoping Report

Table 43 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	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.
Scottish Environment Protection	General	Generally, the scoping report provides clear and detailed information on the proposed scope	Comment noted.	No change to the SEA.

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Agency		and level of detail of the assessment and covers most of the aspects that SEPA would wish to see addressed at this stage.		
	Policy Context Appendix I	SEPA consider that the PPS listed in Appendix I 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 I 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	With regards to flooding issues, page	The CNPA welcomes the	Amend paragraph on page 81

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	Baseline Appendix 2	<p>81 of the scoping report states that “while all of the National Park’s rivers 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>	comment and proposes a change to address the identified issue.	<p>of the Scoping Report and 103 of the Environmental Report as follows:</p> <p>While All of the National Park’s rivers and watercourses have the potential to flood to some degree (Figure 29). 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. However, the pattern of settlement in the National Park is now is generated along the National Park’s main straths and glens, and so as 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. Small watercourses also represent a risk but are often poorly understood with respect to the severity of the flood</p>

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				<p>hazard that can be generated on a catchment scale. 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.</p> <p>In order to more clearly demonstrate this, CNPA agree with SEPA's proposal to provide more detailed information on</p>	<p>Changes are too substantial to outline <i>verbatim</i> within the table; however they include:</p> <ul style="list-style-type: none"> ➤ Maps of PVAs and catchment areas; and ➤ Graphics showing the relative cost of damage within individual PVAs, catchment areas and the National Park as a whole. <p>See pages 104 to 111 of the Environmental report.</p>

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			PVAs and therefore has made numerous updates to the baseline 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	Comment noted.	No change to the SEA.

Consultation Authority	Section of Scoping Report	Comment	Response of CNPA	Change to SEA
		consistent framework with which to assess environmental effects.		
	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	This information will be presented in the 'Nature of Effect' column of the assessment matrix.	No change to the SEA.

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		are made during the assessment and difficulties and limitations encountered.		
	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	Comment noted. The CNPA will consider this issue when assessing the NPPP's options.	No change to the SEA.

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		flood risk elsewhere.		
	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	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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		to implement them.		
	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	Comment noted.	No change to the SEA.

Consultation Authority	Section of Scoping Report	Comment	Response of CNPA	Change to SEA
		framework.		
		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"> ➤ 1a Avoid erosion and support restoration of peat and carbon rich soils ➤ 1a Minimise carbon emissions from land use (e.g. muirburn) ➤ 1a Expand woodland cover (to increase carbon sequestration) ➤ 1b Enhance habitat connectivity and species diversity ➤ 3a Promote land uses and habitat changes that will help to decrease run-off, stabilise slopes, and 	<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"> ➤ Maintain or improve the carbon storage capacity of peat and soils. 	<p>Amend the sub-objective to Objective 4 as follows:</p> <ul style="list-style-type: none"> ➤ Maintain, restore or improve the carbon storage capacity of peat and soils. <p>Add the following sub-objective to Objective 4:</p> <ul style="list-style-type: none"> ➤ Minimise carbon emissions from land use (e.g. muirburn). <p>Amend the sub-objective to Objective 6b as follows:</p> <ul style="list-style-type: none"> ➤ Maintain or improve the carbon storage capacity of woodland to sequester and store carbon. <p>Add the following sub-objective to Objective 3a:</p> <ul style="list-style-type: none"> ➤ Promote land uses and habitat changes that

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		attenuate flows.	<p>➤ Minimise soil erosion.</p> <p>However, the CNPA does not consider that the ‘restoration of peat and carbon rich soils’ has been fully covered and therefore proposes an amendment.</p> <p>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</p>	<p>will help to decrease run-off, stabilise slopes, and attenuate flows.</p>

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			and enhance biodiversity, distinctive native species and habitats and therefore no changes are needed. 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: ➤ Avoid the introduction and spread of invasive non-native species and tree diseases.
	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: ➤ Protect and enhance the National Park’s special landscape qualities.
	Appendix 2: Environmental Baseline	It may be worth referring to the various sources of carbon emissions associated with land use e.g. erosion	These matters are already covered under Topic 4: Soil. The interrelationship between the	No change to the SEA.

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	Topic 1: Climatic Factors	of peat and carbon rich soils; muirburn.	Climatic Factors and Soil topics is recognised throughout the SEA.	
	Appendix 2: Environmental Baseline Topic 6: Biodiversity, Fauna and Flora	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: “While the Cairngorms NNR, Dinnet Oakwood NNR and Morrone Birkwood NNR are technically declared NNRs (see Table 12), 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	The CNPA welcomes the comment and proposes the	The identified pressures for each interest or qualifying

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		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 affecting smaller numbers of features and sites.	following changes.	feature of have been provided in Tables 17, 18 and 19 of the Environmental Report.
		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.

Consultation Document Environmental Report

Table 44 Responses to consultation on the Environmental Report for the Consultation document and the actions taken in response.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
Historic Environment Scotland	Appendix 7: Assessment of Outcomes and Options	<p>We are broadly content with the findings of the Environmental Report (ER). However, we noted that commentary on the assessment of the Landscape and Cultural Heritage topic focussed on landscape and was limited in its discussion of effects of cultural heritage, and historic environment in particular. It would have been helpful for the commentary to describe the assessment of effects for the historic environment.</p> <p>In the case of Policy 2.2, we would have expected the assessment to recognise the potential for negative effects on the historic environment from woodland expansion.</p>	CNPA welcomes the comment and proposes a change to address the identified issue.	<p>The historic and cultural environment is represented within the National Park's special qualities, which are described in Table 28. These are referenced throughout the assessment and have been taken account when considering potential effects.</p> <p>Specific reference to the potential for negative effects on the historic environment from woodland expansion has been added to the assessment of Policy, 2.2 which has been renamed in this document as policy 1.2.</p>
Scottish Environment Protection Agency	General	SEPA consider the ER to be well written and structured. They are pleased to see that the comments provided in our scoping response have been taken into account in the preparation of the ER, and welcome Table 52 contained in Appendix 5	Comment noted.	No change to the SEA.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		which shows how the scoping consultation comments have been addressed for all consultees.		
		SEPA agree that significant negative effects on the environment in which they have an interest are not likely.	Comment noted.	No change to the SEA.
	Non-Technical Summary	SEPA consider the Non-Technical Summary to be clear and comprehensive, providing a good summary of the contents of the ER	Comment noted.	No change to the SEA.
	Introduction	SEPA consider the Non-Technical Summary to be clear and comprehensive, providing a good summary of the contents of the ER	Comment noted.	No change to the SEA.
	Policy Context	SEPA are satisfied that a comprehensive review has taken place of the key plans, programmes and strategies (PPS) in the preparation of the ER and welcome Appendix which lists these and the relationship between the NPPP and the PPS.	Comment noted.	No change to the SEA.
	Appendix 2: Environmental Baseline	The ER provides a good summary of the baseline data and the aspects of the environment we have an interest.	Comment noted.	No change to the SEA.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		<p>For your information the RBMP data for 2015 is now available at http://www.sepa.org.uk/environment/water/classification/classification-results/.</p> <p>To aid ease of obtaining the information relevant to the NPPP area a map of the 2015 classification a classification spreadsheet of the water bodies within the Cairngorms will be sent separately to you via email. In summary, we are pleased to report there has been an increase in water bodies improving their overall status within the NPPP area.</p>		
	Appendix 7	SEPA generally agree with the assessment results and detailed assessment available in Appendix 7.	Comment noted.	No change to the SEA.
		SEPA note that the assessment of the preferred Policy 2.2 is a major positive effect on the SEA Objective 4 - Safeguard and improve soil and peat quality. SEPA are of the opinion that as the preferred Policy 2.2 is currently worded this may not be achieved.	CNPA welcomes the comment and proposes a change to address the identified issue.	Change policy wording to: d) securing effective management protection and sustainable management of peat and carbon-rich soils and restoring them where

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		<p>In order for a major positive effect to be achieved we would recommend the following rewording of part c of this policy:</p> <p>c) securing effective management sustainable management and protection of peat and carbon-rich soils.</p> <p>The term 'effective management' is a little ambiguous and this rewording would make the aim of the policy clearer and stronger, providing enhanced mitigation for this effect.</p>		<p>they are degraded.²⁵</p>
		<p>SEPA note that the assessment has identified only one potentially significant negative effect and that mitigation proposals are included for this and those preferred policy options where the significance of the environmental effect is uncertain or may have a minor negative effect.</p> <p>SEPA welcome the identification of a number of opportunities for enhancing the performance of the NPPP</p>	<p>Comment noted.</p>	<p>No change to the SEA.</p>

²⁵ Details of all changes between to the outcomes and policies between the consultation and final versions of the NPPP are provided in Appendix 4.

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		throughout the SEA process and that, as a result of this and the fact that all polices will be applied together, that no further mitigation measures are needed to avoid significant negative environmental effects arising from the application of the plan policies.		
	Mitigation	SEPA welcome the inclusion of Table 9 which clearly identifies the mitigation measures required, when they are required and who will be responsible for implementing them.	Comment noted.	No change to the SEA.
	Monitoring	SEPA note that the potential for significant effects has only been identified for one element of the NPPP and welcome that the ER proposes a monitoring strategy for this. There are minimal monitoring proposals for other environmental effects but welcome and support the intention to develop a monitoring regime further as the NPPP is developed.	Comment noted.	No change to the SEA.
Scottish Natural Heritage	General	SNH generally agree with CNPA's assessment of significant environmental effects arising from the proposed plan vision, objectives and policies.	Comment noted.	No change to the SEA.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		With the exception of the issues highlighted below, SNH also agree that the mitigation already contained within the wording of the policies, and the fact that all policies will be applied together, mean that no further mitigation measures are needed to avoid significant environmental effects arising from application of the plan policies	Comment noted.	No change to the SEA.
		CNPA have included minimal proposals for monitoring at this stage. SNH support CNPA's intention to develop the monitoring regime further as the Partnership Plan is developed.	Comment noted.	No change to the SEA.
		SNH welcome CNPA's incorporation of their comments on the scoping report.	Comment noted.	No change to the SEA.
	Table 2, Environmental baseline, p15 'Biodiversity, Fauna and Flora' and Appendix 2 p145-188	SNH recommend the report on the 'Summary condition' of features on designated sites, rather than 'Assessed condition'. For the purposes of reporting to Government and making public statements we use 'Summary condition'. Features in 'recovering' summary condition are reported as	CNPA welcomes the comment and proposes a change to address the identified issue.	Changes are too substantial to outline <i>verbatim</i> within the table. However, Table 18 and Table 19 have been amended to reflect this comment.

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		<p>'favourable'. We report in this way because 'Assessed condition' reflects the last site-based monitoring visit, and these take place only every 6-18 years. 'Summary condition' additionally takes into account whether agreed management is in place to address the causes of unfavourable condition.</p> <p>Some of the sites identified on p15 as having no features in favourable condition do, in fact, have features in 'recovering' summary condition, which have been under remedial management for over decade and are no longer a cause for concern.</p>		
	Appendix 2: Environmental Baseline	Wildcat, p199-200 text & Fig 104. They are 'Wildcat Priority areas' (not 'protection areas').	CNPA welcomes the comment and proposes a change to address the identified issue.	References to 'Wildcat Protection Areas' changed to 'Wildcat Priority Areas'.
	Topic 6: Biodiversity, Fauna and Flora	Biodiversity key messages, p214. The 2nd paragraph presents a rather depressing picture. It might also be worth mentioning in the preceding pages, and highlighting here, the increase in the area of the CNP now under ownership and management driven by conservation objectives, and	CNPA welcomes the comment and proposes a change to address the identified issue.	References to Cairngorms Connect, the East Cairngorms Moorland Management Group and the area of native woodland created since 2013 have been added to the baseline and recognised in the assessment.

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	<p>Table 6: Summary of the SEA of the NPPP's Outcomes and Options</p> <p>Appendix 7: Assessment of Outcomes and Options</p> <p>Policy 1.2</p> <p>SEA objective 6a</p>	<p>the increase in area of native woodland over the past decade or so?</p> <p>SNH disagree with CNPA's rationale for identifying a major adverse environmental effect.</p> <p>Policy 1.2a states that the main settlements and An Camas Mor will be the focus for future growth and housing land supply, while maintaining the integrity of designated sites. It would not be possible for a growth or housing plan or project to comply with this policy if there is a threat of significant recreational disturbance to capercaillie in nearby woodlands, or of significant impacts on freshwater pearl mussel in the river SACs, because either scenario would not maintain the integrity of designated sites. SNH therefore disagree that this policy, as worded, has potential for major adverse effects in relation to the SEA criteria to protect the integrity of designated sites.</p> <p>SEA objective 6a has a wide range of</p>	<p>CNPA welcomes the comment and proposes a change to address the identified issue.</p>	<p>A number of changes to this policy have occurred since the consultation. These have partly been on the basis of consultation responses and partly in response to a changing baseline. The SEA has taken account of SNH's comments in its reassessment.</p>

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		criteria and in our view Policy 1.2 could potentially have minor adverse effects on some, minor positive effects on others, and uncertain effects on others.		
	Table 6: Summary of the SEA of the NPPP's Outcomes and options Appendix 7: Assessment of Outcomes and Options Policy 2.4 SEA objective 6a	We advise that the policy to expand woodland, as depicted in the 'woodland expansion' map presented on p17 of the Big Issues report, could have adverse effects on the integrity of (a) some SACs (eg Beinn a'Ghlo; Cairngorms), as a consequence of the potential for loss of qualifying open ground habitats due to conversion to woodland; and (b) some golden eagle SPAs (e.g. Cairngorms Massif), due to potential loss of foraging habitat. There is likely to be scope for some trees and/or woodland types in the locations shown on this map, but they will need to be planned and located carefully to avoid adverse effects. As a consequence we recommend a score of '- -'. This could be mitigated by adding the following to Policy 2.4 'ensuring the integrity of designated sites is maintained'.	CNPA welcomes the comment and proposes a change to address the identified issue.	Change policy wording to: Conserve and enhance habitat quality and connectivity while ensuring the integrity of designated sites is maintained , with a particular focus on:

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
	<p>Table 6: Summary of the SEA of the NPPP's Outcomes and options</p> <p>Appendix 7: Assessment of Outcomes and Options</p> <p>Policies 3.2 and 3.3</p> <p>SEA objective 6a</p>	<p>There is potential for the promotional aspects of policies 3.2a, 3.3a, 3.3b to encourage recreation that could disturb sensitive species such as capercaillie and other ground nesting birds. This could have negative effects on SEA objective 6a biodiversity. We also recognise that other parts of these policies (3.2b, 3.3c, 3.3d) should have positive effects. If all parts of the policies are to be applied simultaneously then your assessment of a minor positive effect seems reasonable. However it would be worth flagging the potential negative effects in the final column of Table 6, and considering mitigation in Table 9.</p>	<p>CNPA welcomes the comment and proposes a change to address the identified issue.</p>	<p>The potential for disturbance has been recognised in the assessment of policies 3.2 and 3.3, renamed 2.2 and 2.3 in this document. This has also been summarised in Table 9 but no changes were needed to Table 6.</p>
	<p>Monitoring</p>	<p>The CNPA's proposals are currently restricted to monitoring the capercaillie population. SNH feel that this restricted focus is unlikely to be appropriate in the light of their comments. They would advise that a wide variety of factors influence the size and productivity of the capercaillie population; of which recreation is but</p>	<p>CNPA welcomes the comment and proposes a change to address the identified issue.</p>	<p>A broader set of indicators has been developed and is presented in Table 10. The monitoring framework will be finalised in the Post Adoption Statement and the CNPA would welcome the input of the Consultation Authorities in developing these.</p>

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		one. They would therefore caution against inferring anything about trends in recreational disturbance from your proposed indicators.		
		We welcome your intention to consider monitoring and indicators further as you develop the Partnership Plan.	Comment noted.	No change to the SEA.