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PLANNING

Cairngorms National Park Local  
Development Plan 2020

**Strategic Environmental Assessment  
Environmental Report January 2019**

**Appendix 4: Consultation Responses**

## Appendix 4: Consultation Responses

### Scoping Report

Table 45 Responses to consultation on Scoping Report and the actions taken in response.

Consultation Authority	Section of Scoping Report	Comment	Response of CNPA	Change to SEA
<b>Scoping Report Consultation</b>				
<b>Historic Environment Scotland</b>	General	We note that the historic environment (under landscape and cultural heritage) has been scoped into the assessment. On the basis of the information provided, we are content with this approach and are satisfied with the scope and level of detail proposed for the assessment, subject to the detailed comments provided in the attached annex.	Comment noted.	No change to the SEA.

Consultation Authority	Section of Scoping Report	Comment	Response of CNPA	Change to SEA
	General	We note that it is proposed that the Main Issues Report and its Environment Report shall be subject to consultation for a period of 6 weeks between February and April 2017. We are content with the length of consultation period proposed. Please note that, for administrative purposes, we consider that the consultation period commences on receipt of the relevant documents by the SEA Gateway.	Comment noted.	No change to the SEA although period over which consultation will take place has been changed to November 2017 to March 2018.
	Policy Context	We welcome the way in which the context of the Plan has been identified and presented in Appendix I. You may also wish to include the Historic Environment Strategy for Scotland (2014) and the section referring to the Managing Change in the Historic Environment series should be updated to refer to the Historic Environment Scotland Policy Statement 2016.	Comment noted.	No change to the SEA.
	Baseline	We welcome that the environmental baseline includes cultural heritage. We would note that our information currently indicates that there are 106 scheduled monuments within the	The CNPA welcomes the comment.	Suggested change made.

Consultation Authority	Section of Scoping Report	Comment	Response of CNPA	Change to SEA
		National Park boundary rather than the 110 indicated in Table 2 and Appendix 2, Topic 7.		
	Baseline	We are content that cultural heritage is scoped into the environmental assessment and that both positive and negative impacts are considered.	Comment noted.	No change to the SEA.
	Baseline	We are content with the SEA objective for Topic 7 which reflects the first aim of the Cairngorms National Park Authority. Regarding the SEA sub-objectives, you may wish to consider adding 'where appropriate' to this objective (before the word enhance) for it to read 'value, protect and, where appropriate, enhance the historic and cultural environment and its assets.'	We welcome the comment, but disagree. The word 'appropriate' is notoriously ambiguous within the field of spatial planning and should be avoided. We are content with the scope of the sub-objective.	No change to the SEA.
	Baseline	We welcome the references to the inter-relationships between the topics, however, you may wish to consider including Landscape and Cultural Heritage as an inter-relationship at topic 1a, as the sub-objective to support investment in suitable renewable energy resources	The CNPA welcomes the comment and proposes a change to address the identified issue.	Include Landscape and Cultural Heritage as an inter-relationship at topic 1a

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		could have considerable implications for cultural heritage. We welcome the references to cultural heritage and the built environment in topics 8a and 8b.		
	Compatibility of SEA objectives	While we welcome the easy to view matrix format of Figure 3 it would be helpful if objective 7 on both axes could refer to landscape and cultural heritage. We would also suggest that there may be the possibility for objective 3 Flood Risk to have a relationship with objective 7 landscape and cultural heritage, as depending on the scale of development to reduce flood risk (flood alleviation schemes etc.) there is the potential for impacts to cultural heritage assets.	<p>The CNPA welcomes the comment and proposes a change to address the identified issue</p> <p>While the CNPA agrees that there is a relationship it does not believe that the objectives are necessarily incompatible. The relationship in Table 3 is therefore identified as being uncertain.</p>	Landscape and cultural heritage referred to on both axes of Table 3.
	Proposed Assessment Framework	We are content with the proposed assessment matrix (Table 5) and welcome that it includes scope for narrative commentary to complement a scoring system and also that mitigation measures will be recorded	CNPA welcome the comment.	Table has been split into two.

Consultation Authority	Section of Scoping Report	Comment	Response of CNPA	Change to SEA
		within the assessment matrix. We also welcome the proposed approach to proportionate assessment, focusing on significant effects. We would suggest that Table 6 is separated more clearly into two parts to avoid any confusion or assumed relationship between the significance of effect and the scale and permanence of effect.		
	Predicting the Effects of Implementation	We welcome the early engagement with key stakeholders and interested parties, we would be happy to continue to provide advice and information regarding baseline information, alternatives, mitigation and enhancement throughout the Plan process.	Comment noted.	No change to the SEA.
	Mitigation & Enhancement and Monitoring	We note that recommendations for mitigation and enhancement will be proposed and that a monitoring framework will be provided. We look forward to further details on these subjects as the assessment progresses.	Comment noted.	No change to the SEA.
	Appendix 2	The references to Scottish Historic Environment Policy (SHEP) throughout this topic (for example in	Comment noted.	References to SHEP replaced with reference to Historic Environment Scotland Policy

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		the Gardens and Designed Landscapes and Battlefields sections) should be updated to reflect the replacement of SHEP by the Historic Environment Scotland Policy Statement (2016).		Statement (2016).
<b>Scottish Environment Protection Agency</b>	Relationship with other Plans, Policies and Strategies (PPS)	We 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.
	Relationship with other Plans, Policies and Strategies (PPS)	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 Local Development Plan 2020 (LDP). 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.	Comment noted.	No change to the SEA.

Consultation Authority	Section of Scoping Report	Comment	Response of CNPA	Change to SEA
	Relationship with other Plans, Policies and Strategies (PPS)	<p>For your information, we have recently updated our SEA Guidance in relation to our interests. Direct links are provided here for your convenience.</p> <ul style="list-style-type: none"> <li>➤ LUPS-SEA-GU1 - Guidance on consideration of air in Strategic Environmental Assessment</li> <li>➤ LUPS-SEA-GU2 - Guidance on consideration of soil in Strategic Environmental Assessment</li> <li>➤ LUPS-SEA-GU3 - Guidance on consideration of water in Strategic Environmental Assessment</li> <li>➤ LUPS-SEA-GU4 - Guidance on consideration of material assets in Strategic Environmental Assessment</li> <li>➤ LUPS-SEA-GU5 Guidance on consideration of human health in Strategic Environmental Assessment</li> </ul>	Comment noted.	No change to the SEA.
	Baseline information	Table 2 provides a good summary of baseline data and the aspects of the environment where we have an interest. However, we note that in	CNPA welcome the comment.	Update baseline to reflect 2014 figures.



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		Table 2, page 12, 2013 figures have been used to illustrate the overall status of waterbodies. Whilst in Topic 3 chapter 2014 data is included. As you are aware through our recent consultation response to the ER for the Cairngorms National Park Partnership Plan 2017-2022 (PSC/147769) 2015 figures are now available for waterbody status and we ask that these are used in the preparation of the finalised ER for the LDP.		
	Baseline information	With regards to flooding, we welcome the inclusion of reference to potential risk of flooding from small water courses.	Comment noted.	No change to the SEA.
	Environmental problems	We 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.
	Alternatives	We note and welcome that during the development of the LDP alternatives will be considered and that reasonable alternatives identified during the preparation of the plan will be assessed as part of the SEA process.	Comment noted.	No change to the SEA.

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		We note the findings of the assessment will inform the choice of the preferred option and will be documented in the Environmental Report.		
	Scoping in / out of environmental topics	We 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 for assessing environmental effects	We 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.
		We 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.
		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	Comment noted.	No change to the SEA.

Consultation Authority	Section of Scoping Report	Comment	Response of CNPA	Change to SEA
		Environmental Report.		
		We would expect all aspects of the PPS which could have significant effects to be assessed	Comment noted.	No change to the SEA.
		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.	Comment noted.	No change to the SEA.
	Design of the Assessment Matrices	We 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.

Consultation Authority	Section of Scoping Report	Comment	Response of CNPA	Change to SEA
		We are generally content with the proposed SEA objectives to be used in the assessment.	Comment noted.	No change to the SEA.
		However we 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	CNPA welcomes the comment and agrees. Such factors will need careful consideration. However, in the interest of proportionality, they are best considered at the context of the Proposed Plan.	No change to the SEA.
	Assessment of land allocations – relevant to development plan SEA only	When it comes to assessment of the effects of allocations or sites we advocate a rigorous methodology which clearly assesses potential effects on all environmental topics. Our experience in relation to assessment of allocations is that it can be a much easier and useful exercise for the plan-maker if the assessment is made against a range of related questions, rather than directly against the environmental topics. This allows a	CNPA welcomes the comment and agrees.	No change to the SEA.

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		very practical assessment to take place which clearly highlights the environmental benefits and costs of each individual allocation. As an example, assessing the allocation against the question “Can the allocation connect to public sewage infrastructure?” gives a clear practical view on how this allocation is likely to affect the water environment.		
		We would draw your attention to the joint SEA and development plan site assessment proforma which sets out the issues which we require to be addressed in more detail.	Comment noted.	No change to the SEA.
	Mitigation and enhancement	We would encourage you to use the assessment as a way to improve the environmental performance of individual aspects of the final option; hence we support proposals for enhancement of positive effects as well as mitigation of negative effects.	Comment noted.	No change to the SEA.
		It is useful to show the link between potential effects and proposed mitigation / enhancement measures in the assessment framework.	Comment noted.	No change to the SEA.

Consultation Authority	Section of Scoping Report	Comment	Response of CNPA	Change to SEA
		We would encourage you to be very clear in the Environmental Report about mitigation measures which are proposed as a result of the assessment. These should follow the mitigation hierarchy (avoid, reduce, remedy or compensate).	Comment noted.	No change to the SEA.
		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.	Comment noted.	Mitigation measures will be developed through the LDP process. It will not be possible to finalise these until at least the development of the Proposed Plan, when detailed policies and allocations are set out.
		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	Comment noted.	Mitigation measures will be developed through the LDP process. It will not be possible to finalise these until at least the development of the Proposed Plan, when detailed policies and allocations are set out. No change to the SEA.
	Monitoring	It is noted that proposals for monitoring indicators will be	Comment noted.	A draft monitoring framework has been developed, which

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		developed iteratively during the assessment of the draft LDP and confirmed in the finalised ER. Early consideration to the monitoring approach particularly in the choice of indicators is welcomed. It would be helpful if the ER included a description of the measures envisaged to monitor the significant environmental effects of the plan.		builds on the framework developed for the NPPP. There is no requirement for bespoke SEA monitoring, however indicators will be refined as the LDP process progresses.
	Consultation period	We are satisfied with the proposal for a 6 week consultation period for the Environmental Report	Comment noted.	No change to the SEA.
	General	We would find it helpful if the ER included a summary of the scoping outcomes and how comments from the Consultation Authorities were taken into account.	Comment noted.	<i>Et voilà.</i>
<b>Scottish Natural Heritage</b>	General	We assume that a Habitats Regulations Appraisal (HRA) will be carried out in due course. We recommend that the HRA is carried out at the same time as the preparation of the Main Issues Report (MIR) for the LDP, and used to inform both documents (particularly when identifying preferred allocations).	Comment noted.	The HRA and SEA have been carried out at the same time and will evolve together as the LDP process progresses.

Consultation Authority	Section of Scoping Report	Comment	Response of CNPA	Change to SEA
	Baseline	Page 13 and other locations (especially pages 102 – 107): We welcome that geodiversity is included in the scoping report, however we feel that it's inclusion in the Material Assets section is confusing. This is because, unlike the other features identified in this section, it is not a man-made asset but a natural feature. We recommend that consideration of geodiversity is moved into the Soil sections instead.	CNPA welcomes the comment. However, material assets are not all man made. In the case of geodiversity and minerals may be regarded as such.	No change to the SEA.
	Baseline	Pages 14, 163, 165: Reference to the Ladder Hills Special Protection Area (SPA) should be removed, as this site ceased being considered as a candidate SPA some years ago.	CNPA welcomes the comment.	References to Ladder Hills SPA removed.
	Baseline	Page 16, fourth point in the Landscape and Cultural Heritage baseline column: Reference should be made to Wild Land Areas (WLAs) rather than "wild land". This is to avoid confusion with landscape with wildness characteristics that are not part of WLAs, and are considered under different policies in Scottish Planning Policy (SPP).	CNPA welcomes the comment.	References changed to 'Wild Land Areas'.



Consultation Authority	Section of Scoping Report	Comment	Response of CNPA	Change to SEA
	baseline	<p>Page 27, Figure 3: Our advice is that the figure should be reviewed, as we consider that there are relationships between some of the objectives/topics that are currently identified as having no relationship. For example, Objective 2 (air quality) could be considered as relevant to 1b (climate change) due to carbon dioxide and other greenhouse gases that can affect air quality for people and nature. Objectives 6a (biodiversity) and 6b (woodland management) could be considered as relevant to Objective 1b (resilience to climate change), due to climate change affecting the species and habitats capable of surviving in the Park, as well as increasing the transmission of pests and diseases. Objective 7 (landscape) could be considered as relevant to Objectives 3a (flood risk) and 3b (water quality) as both have the potential for landscape scale change. Objective 8a (health and wellbeing) could be considered as relevant to Objective 6a (biodiversity) as being outdoors and experiencing</p>	<p>CNPA welcomes the comment. It is not the intention of the table to identify relationships but the compatibility between objectives. For example, there is indeed a relationship between objectives 1b and 2 however it is not an incompatible one, hence the conclusion in the table. Inter-relationships between topics have however been identified throughout the document,</p>	<p>No change to the SEA.</p>

Consultation Authority	Section of Scoping Report	Comment	Response of CNPA	Change to SEA
		nature is reported to have positive mental and physical benefits for people. Objective 8a (health and wellbeing) could be considered as relevant to Objective 6b (woodland management) for the same reasons but also for access and recreation opportunities that may be created/improved.		
	Baseline	Table 6: We find this table confusing, and recommend that it is split into two, one for significance of effect and another for scale and permanence of effect. This is because, at the moment, if the table is read across the rows, it appears that major positive effects can only occur at a local level, minor positive effects at a regional level, etc. Separating the table would help readers understand that the judgement of the significance of the effect is separate from the judgement as to the scale and permanence of the effect.	CNPA welcomes the comment and agrees.	Table has been split into two.
	PPS	Recommend adding Soils to the SEA Issue/Topic for the below rows in the table. This is because soils are a	CNPA welcomes the comment and agrees.	Reference to 'Soil' made under requested PPS.

Consultation Authority	Section of Scoping Report	Comment	Response of CNPA	Change to SEA
		<p>relevant to the PPS identified either directly (e.g. a peatland Special Area of Conservation) or indirectly as the protection and use of soils underpin many land uses, functions and services  p37, third row, Habitats Directive;  p38: second row, WFD;  p40, second row, Birds Directive;  p43, first row, Biological Diversity;  p44, second row, Habitats Regulations;  p45, third row, Flood Risk Management;  p45, second row, Land Reform;  p45, fourth row, NCA;  p52: fifth row, SBS;  p55, fourth row, UK post 2010;  p57, third row, Cairngorms Nature Action Plan;  p57, fourth row, Active Cairngorms</p>		
		<p>Recommend adding Biodiversity to the SEA Issue/Topic for the below rows in the table. This is because biodiversity is a relevant to the PPS identified e.g. as pollutants adversely affect biodiversity, biodiversity relies upon the feature identified (e.g. soils underpin the wider ecosystem), etc.</p>	<p>CNPA welcomes the comment and agrees.</p>	<p>Reference to 'Biodiversity, Fauna and Flora' made under requested PPS.</p>

Consultation Authority	Section of Scoping Report	Comment	Response of CNPA	Change to SEA
		p39, second row, Groundwater p42, fifth row, Thematic Strategy p45, third row, Flood Risk p58, third row, Economic Development Strategies		
	PPS	Pages 37 - 60: We recommend adding Landscape to the SEA Issue/Topic for the following row in the table. This is because significant development could have landscape scale effects: p58, third row, Economic Development Strategies.	CNPA welcomes the comment and agrees.	Reference to 'Landscape and Cultural heritage' made under requested PPS.
		Pages 110 – 118, Transport Infrastructure. This section does not recognise the existing infrastructure for active travel within the Park. Page 251 states that over half of workers travel less than 10km to their place of work. This presents opportunities to reduce reliance on the private car by increasing active travel opportunities, which may have positive or negative environmental effects depending on location and construction. It is therefore surprising that active travel infrastructure is not identified in this section of the report. We	CNPA welcomes the comment, however active travel infrastructure such as core paths and other rights of way is covered under Topic 8: Population and Human Health.	No change to the SEA.

Consultation Authority	Section of Scoping Report	Comment	Response of CNPA	Change to SEA
		<p>recommend that its inclusion is explored, particularly given the priority of travel modes identified in Scottish Planning Policy paragraph 273. Our advice is that it would be useful to highlight some specific active travel improvements that could be implemented within the lifetime of the 2020 Plan within the MIR. These could then be assessed in the Environmental Report. (This would also ensure that specific examples are identified to encourage progress, and enable progress to be monitored.)</p>		
	Appendix 2	<p>Pages 123 - 143 Table 13, pages 147 – 158 Table 14 and pages 161 – 164 Table 15. Some of the information contained in the tables has been superseded since we provided you with data earlier this year. This is a result of more recent survey work having gone through the quality assurance process and being published. We therefore recommend that the Park Authority contact us for the most up to date data when compiling the Environmental Report, in case further changes have occurred.</p>	<p>CNPA welcomes the comment and agrees.</p>	<p>Tables have been updated with information provided for the NPPP's final SEA, which was published in June 2017.</p>

Consultation Authority	Section of Scoping Report	Comment	Response of CNPA	Change to SEA
	Appendix 2	Pages 123 – 166. In addition to the advice above, we also recommend that for the Environmental Report, it would be sufficient to provide just the text on the overall picture, i.e. the information presented on pages 144 and 145, pages 159 – 160 and pages 165 – 166. If it is felt necessary to include the full data as well, we recommend that the information in Tables 13 – 15 is presented in an Annex to the Environmental Report. This would allow the key points about the condition of protected areas to be more obvious and quickly accessed within the Report.	CNPA welcomes the comment and agrees but is satisfied with the level of detail provided.	No change to the SEA.
	Appendix 2	Page 182, Table 19, Freshwater. As abstraction pressures are of concern for the River Dee SAC in particular, we recommend that this Issue is added to the table.	CNPA welcomes the comment, however the issues identified in the table are those identified by Cairngorms Nature Action Plan 2013-2018. They will be reviewed in line with this document.	No change to the SEA.

Consultation Authority	Section of Scoping Report	Comment	Response of CNPA	Change to SEA
	Appendix 2	Page 196, National Scenic Areas (NSAs). We recommend removal of the text referring to the 1978 descriptions of the NSA special qualities, as this work has been superseded by the special qualities presented in the 2010 publication on The Special Landscape Qualities of the Cairngorms National Park. Whilst we recognise that the original special qualities of the NSAs do not differ significantly from the 2010 list of qualities of the Park as a whole, reference to the 1978 work implies that it has not be reviewed since then, which is incorrect.	CNPA welcomes the comment, however it does not agree with that this is the implication or that it is necessary to remove the reference to a publically available document.	No change to the SEA.

**MIR Environmental Report**

Table 46 Responses to consultation on MIR Environmental Report and the actions taken in response.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
<b>MIR Environmental Report Consultation</b>				
<b>Historic Environment Scotland</b>	General	<p>We welcome the clear, concise presentation of the Environmental Report (ER), and we are broadly content with the summary findings of effects on the historic environment. However, we consider that in relation to the site assessments, effects on the historic environment, and related mitigation measures, have not been fully recognised in some cases. We have provided detailed comments on this and other elements of the ER in annex A below.</p> <p>None of the comments contained in this letter constitute a legal interpretation of the requirements of the Environmental Assessment (Scotland) Act 2005. They are intended rather as helpful advice, as part of our commitment to capacity building in SEA.</p>	Comment noted.	No change to the SEA.



Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
	Assessment of sites	<p>The methodology proposed at scoping included the combination of landscape and cultural heritage within a single SEA objective. Whilst we continue to be content with this approach in principle, our review of the site assessments suggests that the focus in assessment and /or reporting of effects has been on the landscape elements of the objective, rather than the sub-objectives addressing the historic environment.</p> <p>In many cases neither the site assessment pro-forma nor the environmental assessment recognises that heritage assets are either within or adjacent to the site, or provide an analysis of potential effects. In other cases, the site assessment pro-forma records heritage assets/s, but no analysis of effects is recorded, and the assessment scorings do not appear to indicate that historic environment effects have been taken into account. This is the case for several sites that have the potential to affect non-</p>	Comment noted.	The greater focus on the historic environment has been taken in the assessment of the Proposed Plan.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		<p>designated heritage assets, but also some sites which may affect designated heritage assets:</p> <p><b>An Camas Mor: THC031</b>  The assessment for this site identifies significant negative effects for the landscape and cultural heritage topic, and we agree with this finding. However, the assessment commentary does not include any discussion of the effects on the historic environment, and in particular scheduled monument SM9337. In view of this, it is unclear whether the effects on the historic environment have been assessed. Additionally, the assessment has not identified any mitigation measures in relation to either the preferred or alternative options. We would have expected the assessment to clearly set out whether the two options have differing environmental effects and mitigation requirements, to better inform decision making and consultation in relation to the two options.</p>	<p>The CNPA acknowledges and agrees with this consultation response.</p>	<p>Recognition of the SM, which is not within the site boundary, has been added to the assessment.</p>

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		<p><b>Blair Atholl: PKC004</b> This non-preferred site contains or is adjacent to scheduled monument SM730 (adjacent to Clach na h'lobairt, standing stone, Blair Atholl), and we consider that development of the site has potential for negative effects on the heritage asset. However, the assessment gives no indication that effects on the heritage asset have been considered, or that any mitigation measures have been identified.</p>	<p>The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.</p>	<p>No change to the SEA.</p>
		<p><b>Blair Atholl: PKC006</b> This site is within the Blair Castle Inventory Designed Landscape, and consequently we consider that development of the site has potential for negative effects on the heritage asset. However, the assessment gives no indication that effects on the heritage asset have been considered, or that any mitigation measures have been identified.</p>	<p>The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.</p>	<p>No change to the SEA.</p>

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		<p><b>Braemar: AB002</b> This site contains A listed Tomintoul Croft and we consider that development of the site has potential for negative effects on the heritage asset. However, the assessment gives no indication that effects on the heritage asset have been considered, or that any mitigation measures have been identified.</p>	<p>The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.</p>	<p>No change to the SEA.</p>
		<p><b>Inverdrurie: THC025</b> This site contains a B listed building (LB252 Dell Steading (Rothiemurchus Estate Office). Whilst the environmental assessment recognises this, and suggests that demolition of the building may occur, it finds only a minor negative effect, due to uncertainty over the demolition. We suggest that it would have been helpful for the assessment to consider the effects of the two likely development scenarios, i.e. the demolition of the buildings or their</p>	<p>The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.</p>	<p>No change to the SEA.</p>

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		<p>retention and reuse. This would allowed the assessment to contribute to a more nuanced consideration of the acceptability of the site, and would led to identification of helpful mitigation and /or enhancement measures relevant to each scenario. We consider that a scenario involving demolition of the listed building would more accurately be described as significant negative effect. However, appropriate reuse and / or conversion of the buildings would be likely to have positive effects for the historic environment.</p>		

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
	Mitigation	<p>One of the key elements of environmental assessment is the identification of mitigation measures and opportunities for enhancement. Whilst in some cases the site assessment matrix contains general recommendations for mitigation measures, it is not clear how these measures will be integrated into delivery of the Local Development Plan. Effective integration of mitigation into the Plan itself and lower levels of delivery is essential to reducing negative effects and increasing opportunities for positive effects.</p> <p>In view of this, we recommend that as you move towards Proposed Plan stage, you consider in more detail which mitigation measures are necessary, and how, when and by whom they should be delivered, e.g. through action programmes, masterplanning, developer requirements etc. Wherever possible, measures should be site specific rather than generic.</p>	The CNPA acknowledges and agrees with this consultation response.	Because the proposed plan includes detailed policies and site schedules, it has been possible to outline the mitigation measures in place to address negative effects, including site specific measures such as the need for surveys.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
<b>Scottish Environment Protection Agency</b>	General	SEPA are content that the Environmental Report (ER) provides a satisfactory general assessment of the likely significant environmental effects of the Cairngorms Local Development Plan 2020 Main Issues Report (MIR).	Comment noted.	No change to the SEA.
		Subject to the detailed comments SEPA are generally content with the assessment findings.	Comment noted.	No change to the SEA.
		We consider that the ER document provides a good summary of the process and are generally in agreement with the detailed results of the assessments presented.	Comment noted.	No change to the SEA.
		The next ER should clearly outline proposed mitigation measures. For example, in the individual site assessments very few mitigation measures have been put forward. It would have been useful for initial ideas for mitigation to be outlined at this stage so that there was an early opportunity to provide comment on them.	The CNPA acknowledges and agrees with this consultation response.	Because the proposed plan includes detailed policies and site schedules, it has been possible to outline the mitigation measures in place to address negative effects, including site specific measures such as the need for surveys.
		SEPA are satisfied that most of our	Comment noted.	No change to the SEA.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		scoping report comments have been taken into account in the preparation of the ER and note the response Cairngorms National Park to our comments in Appendix 4 – Consultation Responses.		
		SEPA have provided a separate response to the MIR (PCS/165156) where we have responded to the Main Issues questions. In addition, we have provided comments related to MIR allocations to the Adopted LDP policy framework.  SEPA recommend that our comments to the MIR are considered in the revision of sites and policies environmental assessment in the next ER.	Comment noted.	No change to the SEA.
	Relationship with other Plans, Policies and Strategies (PPS)	We consider all the PPS relevant to our interests as listed in Appendix I have been considered in the ER	Comment noted.	No change to the SEA.
	Baseline	SEPA note and welcome that a Strategic Flood Risk Assessment (SFRA) has been carried out at this	Comment noted.	No change to the SEA.



Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		<p>stage and are satisfied that this has adequately informed the site assessment process. Most sites that have been identified at being at medium to high risk of flooding have not been carried forward into the plan as preferred sites and this we welcome. Further detailed comments on specific site flood risk assessment can be found in SEPA's MIR response and should be taken forward to the next ER report.</p>		
		<p>SEPA note 2014 figures for waterbody status have now been used throughout the ER, we highlight once again that 2015 figures are now available and we ask that these are used in the preparation of the finalised ER for the LDP. The water section refers to classification up to 2014.</p>	<p>The CNPA acknowledges and agrees with this consultation response.</p>	<p>Waterbody status information used in the assessment has been updated to take account of the latest available data.</p>
		<p>SEPA's Development Plan Guidance on Sustainable Resource Use and Energy recommends the use of the Scottish Governments Spatial Planning Assessment for Climate Emissions (SPACE) tool. SPACE is designed as a</p>	<p>Comment noted, however owing to the small scale of the development proposed over the Plan period, the CNPA has opted not to use the SPACE tool, which is not a mandatory requirement</p>	<p>No change to the SEA.</p>

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		straightforward means of informing the ER of the likely relevant emissions that will arise from the proposed spatial policies and guidance. We recommend the spatial strategy going forward should be informed by the SPACE tool. More information is available at the SPACE launch pad site.	of the LDP process.	
	Environmental Problems	As highlighted previously SEPA are generally satisfied with the section on environmental problems and the Main Issues identified in the MIR.	Comment noted.	No change to the SEA.
	General comment on assessments	SEPA are satisfied that on the whole the assessment scores are transparent with objective-specific comments given in the site assessment table.	Comment noted.	No change to the SEA.
		As a general comment on choosing “preferred options” SEA is meant to help inform this process. This means that the assessments should help decide which the ‘preferred’ options are, rather than SEA being carried out once ‘preferred’ options have been established. This is not particularly apparent in terms of the Main Issues options. However, individual site	It should be noted that the LDP is not an entirely new plan, but an update of the existing LDP (2015), which was subject to its own SEA. Some of the sites included for allocation are therefore already allocations, while others already benefit from planning consent. Options for new sites are limited; however,	No change to the SEA.

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		assessment does appear to have been used to inform the MIR to some degree, which we welcome.	the SEA was used to inform the choice of preferred options, along with other criteria which are go beyond the SEA.	
		<p>Looking at the site assessment table there appears to be some sites which would have major adverse effect on several issues when assessed against the SEA objectives but are still included in the MIR as 'preferred sites'.</p> <p>The conclusion to prefer these sites is not transparent, with no indication in the Addendum: Site Assessments of mitigation measures that would make these sites acceptable in terms of the SEA objectives. It is therefore is not clear why the assessment leads to them being preferred sites over alternative sites that appear to have less adverse effect in relation to the SEA objectives, especially when no overall score is given. For example AB023 Braemar, PKC005 Blair Atholl, THC016 Dalwhinnie, THC031 An Camas Mor, THC068 Carr-Bridge all</p>	<p>The choice of sites is not solely based on the assessment of the SEA, and the choice of preferred site took in a range of considerations, including site viability, sequential location and landownership concerns.</p> <p>With respect to the sites specifically mentioned in this consultation response:</p> <ul style="list-style-type: none"> <li>➤ AB023 is no longer a preferred site on the basis of an objection from SEPA on flood risk grounds;</li> <li>➤ PKC005 is clearly the best of the available housing sites in Blair Atholl after PKC003, which was also a Preferred Site e.g. PKC006 is even further away from the settlement</li> </ul>	No change to the SEA.

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		<p>have been assessed with at least two major effects but are preferred sites.</p>	<p>core, PKC007 floods and PKC004 is a current caravan site with significant legal barriers to its use as a housing site;</p> <ul style="list-style-type: none"> <li>➤ THC031 is an existing consent projected to be delivered over the plan period and beyond and therefore needs to be taken into account;</li> <li>➤ THC068 is an existing economic development allocation and represents an ideal location for such a development, particularly considering the limited alternative options.</li> </ul> <p>It should also be noted, as stated in the Site Assessment section of the report, that all assessment 'scores' are pre-mitigation and that mitigation measures are designed to ensure significant adverse effects do not occur.</p>	

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	Existing Sites	<p>SEPA welcome that all sites have been assessed including those with existing planning permission and those carried forward from the current LDP. A planning permission may lapse but significant environmental effects due to changes in the environment or the most recent information may relate to the site. For example, revised flood risk information may be available which alters the potential environmental effects at the site and would require mitigation through a FRA for any future application.</p> <p>Where SEPA have identified this to be the case in Appendix 2 of our MIR response, SEPA recommend that a developer requirement is added to the plan to reflect this.</p>	<p>The CNPA acknowledges and agrees with this consultation response.</p>	<p>Where required, the need for an FRA has been included within the site requirements section of the LDP.</p>
		<p>SEPA have made detailed comments in our MIR response for the Ballater HI site with regards to flood risk. We request the ER is updated to reflect these comments at Proposed Plan stage.</p>	<p>The CNPA acknowledges and agrees with this consultation response.</p>	<p>The study commissioned by Aberdeenshire has been taken account of into the site assessment and the following site specific mitigation recommended:</p> <ul style="list-style-type: none"> <li>➤ Adjustments to site</li> </ul>

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				<p>layout to provide new open space in the areas that are at risk from flooding</p> <ul style="list-style-type: none"> <li>➤ Requirement in the site information section of the LDP that development of the site take account of the Ballater Flood study commissioned by Aberdeenshire Council and that safe access and egress options need to be identified.</li> <li>➤ Requirement for a Drainage impact assessment</li> </ul>
	<p>Sites not assessed</p>	<p>It appears that sites Kingussie ED3 and Dulnain Bridge EPI have been assessed or have not been included in the Addendum of site assessments. If they have not been assessed we request these are included in the next ER should they be carried forward into the Proposed Plan.</p>	<p>Site ED3 in Kingussie was not assessed. The assessment in this Report is referenced under Kingussie ED2.</p> <p>Site EPI in Dulnain Bridge was assessed during in the Environmental Report on the</p>	<p>Assessments included in the Environmental Report on the Proposed Plan.</p>

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
	<p>Sites where flood risk has not been identified as a negative effect</p>	<p>SEPA have assessed flood risk for all sites and note flood risk is not scored within the ER as a negative effect at the following sites:</p> <ul style="list-style-type: none"> <li>➤ Aviemore THC045 and THC059, Grantown on Spey C2, T1, and THC048,</li> <li>➤ Kingussie ED1,</li> <li>➤ Newtonmore H1,</li> <li>➤ Blair Atholl EP2, ED1, C1, PKC002, and PKC003.</li> <li>➤ Braemar AB022,</li> <li>➤ Cromdale ED1 and THC019,</li> <li>➤ Kinraig ED1, THC046, and THC054</li> <li>➤ Glenshee PKC008, PKC009 and PKC010.</li> </ul> <p>In addition sites Kingussie ED3 and do not appear to have been assessed at all. We recommend these sites are reassessed in this regard and the ER is amended appropriately after reviewing our comments in Appendix 2 of our MIR response. For example</p>	<p>MIR. The assessment in this Report is referenced under Dulnain Bridge H2.</p> <p><b>Aviemore</b> THC045 / 059 (now LTH1): SEPA data indicates that this site is only at risk from small areas of surface water flooding. This is acknowledged in the assessment. The CNPA stands by the conclusion that “These are however so minor that they are unlikely to have an effect.” And that no negative effects need to be identified.</p> <p><b>Grantown-on-Spey</b> THC048: This area was proposed for allotments. It is not proposed for allocation in the Proposed Plan and therefore no changes are necessary.</p> <p>C2: SEPA data indicates that this site is only at risk from small areas of surface water flooding. This has now been acknowledged</p>	<p>Acknowledge flood risk and amend assessments for sites (Objective 3a):</p> <p>Kingussie: C3 and C4 Blair Atholl: T2, T3 and ED1. Cromdale: ED1</p> <p>No further amendments required as sites not included within Proposed Plan.</p>

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		<p>Kingussie ED1 where a large part of the site floods, we are of the opinion flood risk should be identified as negative.</p>	<p>in the assessment.</p> <p>TI: A small area of TI, which is already used by the site operator, is at risk from surface water flooding. It is not considered that this will result in negative effects arising from the Plan.</p> <p><b>Kingussie</b> ED1 (now C3 and C4) the assessment acknowledged that around 70% of the site is affected by the medium probability river extent flood zone. However the overall assessment took into account the fact that most of the site is already developed in some form. The CNPA however agrees that redevelopment could result in negative effects and has changed the assessment accordingly.</p> <p>ED3 (now ED2) is assessed fully in the Environmental Report of the Proposed Plan.</p>	



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			<p><b>Newtonmore</b>  HI: The assessment acknowledges that around 20% of the site is affected by the medium probability river extend flood zone. This area is however confined to the south and is excluded from the site's developable area. Therefore it is considered that a conclusion of no negative effects is appropriate.</p> <p><b>Blair Atholl</b>  EP2 (now T3): Around 50% of the site is affected by the medium probability river extent flood zone. However the overall assessment took into account the fact that most of the site is already developed in some form. The CNPA however agrees that redevelopment could result in negative effects and has changed the assessment accordingly.</p> <p>ED1: The whole site is affected</p>	

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			<p>by the medium probability river extent and surface water flood zones. However the overall assessment took into account the fact that most of the site is already developed in some form. The CNPA however agrees that redevelopment could result in negative effects and has changed the assessment accordingly.</p> <p>CI (now T2): It is acknowledged that around 20% of the site is affected by the medium probability river flooding zone. This area is however either already developed or undevelopable. The CNPA however agrees that redevelopment could result in negative effects and has changed the assessment accordingly.</p> <p>PKC003 (now H2): The area proposed for allocation is not subject to any flooding. No changes are therefore needed in</p>	

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			<p>the assessment of the Proposed Plan. However, if proposals to expand the site come forward then the proposer will need to acknowledge the potential for negative effects.</p> <p>PKC002: The CNPA acknowledges and that a very small area of the site is at risk from medium probability surface water flooding (&lt;5%). The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.</p> <p><b>Braemar</b></p> <p>AB022 (now H5): SEPA data does not indicate that any part of this</p>	

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
			<p>site is at risk of fluvial or surface water flooding. The assessments conclusion of no predicted effects is therefore considered appropriate.</p> <p><b>Cromdale</b>  ED1: It is acknowledged that a very small area of the site is affected by the medium probability river flooding zone (&lt;5%). This area is however either already developed or undevelopable. The CNPA however agrees that redevelopment could result in negative effects and has changed the assessment accordingly.</p> <p>THC019: The CNPA acknowledges that a small area of the site is at medium risk of river flooding (&lt;5%). The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are</p>	

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			<p>therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.</p> <p><b>Kincraig</b> ED1: SEPA data does not indicate that any part of this site is at risk of fluvial or surface water flooding. The assessments conclusion of no predicted effects is therefore considered appropriate.</p> <p>THC046, and THC054 (now ED2): The area proposed for allocation is not subject to any flooding. No changes are therefore needed in the assessment of the Proposed Plan. However, if proposals to expand the site come forward then the proposer will need to acknowledge the potential for negative effects.</p>	

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			<p><b>Glenshee</b>            PKC008, PKC009 and PKC010:            The CNPA acknowledges and agrees with this consultation response. However none of these sites are preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.</p>	
		<p>Risk of flooding is also considered when scoring the climate change SEA Objective. It is therefore appropriate to allocate a significant negative score to this objective when flooding is an issue. SEPA request that this be done in the final ER.</p>	<p>The CNPA agrees that where amendments are made to acknowledge the potential adverse effects of flooding under objective 3a, then they need to be replicated under objective 1b).</p>	<p>Acknowledge flood risk and amend assessments for sites (Objective 1b):</p> <p>Kingussie: C3 and C4            Blair Atholl: T2, T3 and ED1.            Cromdale: ED1</p> <p>No further amendments required as sites not included within Proposed Plan.</p>

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	Sites where potential impact on wetlands has not been identified as a negative effect	The impact on wetlands appears to fall under SEA Objective 6a A. In SEPA's MIR response they have highlighted where a Phase I habitat survey is required to ascertain the likelihood of wetlands and specifically groundwater dependant terrestrial ecosystems (GWDTE), being impacted by development. These habitats are protected under the Water Framework Directive (WFD) and may be impacted upon by windfarms and other development through the excavation of soil and bedrock during construction of roads, access tracks, foundations, trenches and borrow pits. Indeed dewatering of below ground activities may cause localised disruption to groundwater flow. This can impact on GWDTEs and nearby abstractions.	The CNPA agrees that here relevant, reference to GWDTEs needs to be made within the assessments.	Ensure assessments in Proposed Plan take account of GWDTEs

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	Co-location	<p>SEPA note the possible presence of wetlands has been noted on some site assessments, we note the following sites have not scored negatively under objective 6a:</p> <ul style="list-style-type: none"> <li>➤ Kinguissie THC53,</li> <li>➤ Boat of Garten THC075,</li> <li>➤ Braemar AB019, AB021 and AB024,</li> <li>➤ Cromdale THC021,</li> <li>➤ Nethy Bridge THC017 and THC052,</li> <li>➤ Dalwhinnie THC015 and</li> <li>➤ Dinnet AB014.</li> </ul> <p>SEPA recommend these sites are reassessed in this regard and the ER is amended appropriately after reviewing our comments in Appendix 2 of our MIR response.</p>	<p>The CNPA acknowledges and agrees with this consultation response. The sites revered are however not preferred and will not be included within the Proposed Plan. In some cases this only refers to part of the site, with the problematic parts lying outside of the proposed allocations. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.</p>	<p>No change to the SEA.</p>
		<p>In SEPA's response at to the MIR they have provided information identifying sites which lie in the vicinity of sites which are regulated by them and have advised which of these sites may result in a loss of amenity to neighbouring users, even when they</p>	<p>The CNPA agrees that here relevant, reference to these issues needs to be made within the assessments.</p>	<p>Ensure assessments in Proposed Plan take account of amenity issues relating to sites regulated by SEPA.</p>



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		are operating within their license parameters. These include Aviemore THC045/THC059 and Aviemore North and Dinnet AB013.		
	Proposed Mitigation Measures	<p>SEPA note that the proposed mitigation measures for the SEA Objectives is provided in Table 9.</p> <p>As we highlighted at the scoping stage mitigating environmental effects is a very important aspect of SEA and we will expect the next ER to concentrate heavily on this aspect of the process.</p> <p>Where a proposed site in this ER has been found to have a significant negative effect SEPA would strongly encourage CNPA to revise the proposal to remove that effect before it is included in the Proposed Plan.</p>	The CNPA acknowledges and agrees with this consultation response.	Because the proposed plan includes detailed policies and site schedules, it has been possible to outline the mitigation measures in place to address negative effects, including site specific measures such as the need for surveys. Where necessary, areas at risk from flooding have been either excluded from the development or identified as areas for new open space or as being possibly suitable for SuDs schemes.
		<p>SEA Objective 1b</p> <p>A further mitigation measures for this objective could be tied to Objective 3a in terms of flood risk avoidance taking into account climate change</p>	The CNPA acknowledges and agrees with this consultation response.	It is noted within the general mitigation for sites that flood resistant measures may be delivered through policies 3 and 10.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		and the use of flood resistant building measures.		
		<p>SEA Objective 2 In relation to SEA Objective 2, mitigation measures could include developer requirements to provide air quality impact assessments for combustion plant proposals and if air quality is covered specifically by any policy in the new LDP.</p>	<p>Comment noted, however the LDP does not contain any policies or proposals for combustion plants.</p>	<p>No change to the SEA.</p>
		<p>SEA Objective 3a SEPA have made specific recommendations on how flood risk should be mitigated and these are outlined in our response to the Main Issues Report. In relation to SEA objective 3a a further mitigation measures could include: be a developer requirement to undertake an FRA to inform site layout where flood risk has been identified; reduce the size of an allocation to remove the area indicatively found to be at risk from flooding; removed sites from the Plan that are at significant risk of flooding.</p>	<p>The CNPA acknowledges and agrees with this consultation response.</p>	<p>Site specific mitigation has identified where FRAs and DIAs are required and these have been incorporated into the site information section of the LDP.</p> <p>Where necessary site areas have been reduced where flooding is a risk, while in other instances areas which are at risk from flooding have been identified as suitable for new open space provision and, where appropriate, SuDS schemes.</p>

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		<p>SEA Objective 3b SEPA welcome the specific reference to potential negative effects from construction and stress the importance of construction SuDS in this regard. Strengthening policy requirements for water saving measures, buffer strips and good SuDS will also contribute to this objective.</p>	<p>The CNPA acknowledges and agrees with this consultation response.</p> <p>Policy 3.2 requires development to make sustainable use of resources, including water/</p> <p>Policy 10.1 covers a wide range of requirements, including SuDs and buffer strips</p> <p>Policy 10.2 requires developments to incorporate SuDS as proportionate to the scale and nature of the development.</p>	<p>These requirements are acknowledged in the proposed mitigation measures outlined in the SEA.</p>
		<p>SEA Objective 4 After assessing the sites we agree with there will be little/no impact on peat as all but one site has likely to have peat and even this represents a very small percentage of the site area which can be avoided in detailed site design.</p>	<p>The CNPA acknowledges and agrees with this consultation response.</p> <p>The site in question is HI in Laggan. While the presence of peat on the site is likely to represent a very small percentage of its area, it is considered that mitigation may be necessary to</p>	<p>According to the assessment of the site against Objective 4, site specific mitigation should include the requirement for a peat survey on site HI in Laggan.</p>

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		<p>SEA Objective 6a The avoidance and provision of buffer strips around GWDTE would be a further mitigation measure here and a developer requirement to undertake a Phase I habitat survey on sites where GWDTE may be present would help in delivering this objective.</p>	<p>ensure negative effects do not occur.</p> <p>The CNPA acknowledge the comment. Buffer strips are a requirement of Policy 10.1.</p>	<p>Policy 10 forms part of the LDP's built in mitigation and this has been considered in the SEA.</p>
	Monitoring Framework	<p>SEPA welcome the monitoring proposals outlined and think these are a reasonable and realistic set of proposals. With regards to peatland monitoring the area of peat lost as well as peatland restored would be a good indicator. Another of the indicators perhaps under biodiversity should be percentage loss of wetlands.</p>	<p>CNPA welcomes the comment and agrees with the inclusion of the additional peatland indicator.</p> <p>The wetland indicator is however more problematic as it requires both a definition of what a wetland is and for the change in that to be practically measurable. The emerging CNAP has an indicator about pond creations and it is therefore proposed that the SEA monitoring framework adopt this as the appropriate wetland indicator.</p>	<p>Add the following indicators to the SEA monitoring framework:</p> <ul style="list-style-type: none"> <li>➤ Area of peatland lost due to development</li> <li>➤ Number of new ponds created, including SuDS ponds.</li> </ul>

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	Next steps	SEPA note the timescale for the preparation of the Proposed Plan and updated ER. They note no consultation period has been set for the next ER however we request a minimum of 6 weeks is given and longer would be most welcome.	The CNPA note the comment and commit to set the consultation period for a minimum period of 6 weeks.	Consultation period is set out within the Next Steps section of this report.
<b>Scottish Natural Heritage</b>	General	We have focussed our advice on the new allocations, both preferred and un-preferred. Our understanding is that the site assessment table presents scoring and assessment pre-mitigation. We have provided our advice on this basis. We have also provided advice on the individual allocations based on the size of the allocations in relation to the size of the existing settlement. This means that some of our advice is precautionary, because there is limited information at this stage about the proposed number of units for many allocations, making it difficult to provide more site specific advice on the potential for significant environmental effects.	Comment noted.	No change to the SEA.

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		While it may appear that we have extensive advice on the ER of the MIR, we do appreciate that several of the issues are likely to have arisen because this stage in the planning process can limit the potential for full assessment. We also expect that the Park Authority is likely to already be addressing several of the issues as part of the preparation of the proposed Local Development Plan (LDP).	Comment noted.	No change to the SEA.
	Environmental Report pages 35 – 41	Assessing the effects of Plan Options We find the categorisation by symbol and colouring of the assessment criteria useful. However, we do not find the radar graphs add value to the assessment. This is because they are, by necessity, presented at a very small scale without segmentation or accompanying labels. This renders them confusing as they are almost impossible to interpret. The symbol and colour categorisation of the assessment criteria already provide a visual overview for each item that is assessed. Our advice is that the radar	Comment noted.	Radar graphs not included in this Report.

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		graphs are not necessary.		
	Environmental Report pages 61 – 68, Mitigation	The mitigation measures in the ER document appear to focus on Main Issues and SEA objectives, rather than being site specific and addressing issues for individual allocations. We would expect the ER for the proposed LDP to include mitigation measures for each allocation where mitigation is identified as being necessary to avoid or minimise significant environmental effects. This will be particularly important for allocations with the potential to have significant environmental effects on areas protected for nature conservation, both alone and cumulatively with other allocations. (Our advice on the allocations provided in our separate response to the MIR should help identify appropriate mitigation where necessary.)	The CNPA acknowledges and agrees with this consultation response.	Because the proposed plan includes detailed policies and site schedules, it has been possible to outline the mitigation measures in place to address negative effects, including site specific measures such as the need for surveys.

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	Environmental Report pages 56 – 59 Cumulative assessment	We have reservations about the cumulative assessment, as it appears to focus on the Main Issues and does not appear to include consideration of the potential cumulative impacts caused by the allocations. Cumulative environmental effects require specific attention to ensure appropriate mitigation is put in place at the allocation level. This is of particular importance for areas protected for nature conservation, such as the river Special Areas of Conservation (SACs) and capercaillie Special Protection Areas (SPAs). Our advice is that the ER of the proposed LDP should include full cumulative assessment, including identification of mitigation measures where necessary, for both the policies and allocations.	<p>The CNPA notes the comment. However cumulative effects are not site specific. That is to say, while development might have a cumulative effect on a SEA Objective, the choice of one site over another in any particular settlement, would not. Indeed the same results would arise from any location, allocated or not. With respect to the issue of capercaillie, it is not the location of the sites that is the most problematic aspect, it is the level of development and this is not directed by the site, but the settlement strategy. The cumulative effects of the settlement strategy are considered in this report.</p> <p>It also needs to be recognised that the SEA is not the sole process of assessment undertaken on the LDP. A Habitats Regulations Appraisal has also been carried out, which</p>	No change to SEA.



Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
			has resulted in an Appropriate Assessment around the likely significant effects arising from development on the qualifying features of Natura designations. This has resulted in mitigation measures being included in the LDP. The issue is therefore considered to be fully addressed.	
	Environmental Report pages 69 – 73, Monitoring	While we welcome that monitoring is proposed, it is unclear what will happen to the results or in the event of an unexpected result. It would be helpful for the ER of the proposed LDP to include information on what will happen to monitoring results and what actions may be taken if the results are not as expected.	The CNPA welcomes the comment. As is stated in the Monitoring section of the Environmental Report, this Environmental Report is not the conclusion of the SEA process and the proposed monitoring framework will be refined following its publication. A finalised set of indicators will be set out in the Post-adoption Statement, which will be published following the LDP's approval by the Scottish Government.	No change to SEA.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
	Addendum: Site Assessments, presentation	<p>The pdf site assessment table (referred to as “Addendum: Site Assessments” on the consultation webpage) unfortunately does not show all the text for each cell – where text over-fills cells it is truncated, meaning the full assessment is not visible. While this is not necessarily a significant issue for this stage in the process, it would be beneficial for complete text to be displayed for the next stage. For example, it would be helpful if the original excel spreadsheet could be provided instead of a pdf for the ER of the proposed LDP. This would also make navigating between allocations and objectives easier.</p> <p>- Addendum: Site Assessments, protected areas</p> <p>Unfortunately many of the assessments for allocations do not include recognition of proximity and/or connectivity to areas protected for nature conservation. As we understand that the assessments presented in the ER are pre-mitigation assessments, this means that many of</p>	Comment noted.	Full assessments of the sites taken forward into the Proposed Plan can be found in Appendix 7.
		<p>these allocations have the potential to have significant environmental effects. We therefore disagree with some of the scoring and provide advice in relation to protected areas for</p>	<p>Canterbury National Park Authority   Appendix 6: SEA Assessment Key</p>	

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		Our advice is therefore that the implications of the changes in settlement boundaries and reduction of open space on objectives relating to placemaking, active travel/ accessible recreation opportunities within settlements, areas protected for nature conservation and biodiversity will require assessment in the ER of the proposed LDP.		
	Ballater, Braemar, Dinnet	None of the assessments for allocations in these settlements includes consideration of the River Dee Special Area of Conservation (SAC). As water supplying new development may be sourced by abstraction from the Dee, we recommend pre-mitigation scoring the allocations for these settlements as ‘-‘ under objective 6a, due to the potential to cause likely significant effects on the qualifying interests of the SAC. Some of the allocations may also cause disturbance to otter (through increase human activity, particularly dog walking), a qualifying interest of the SAC and also a	<p>The effects described within this comment are non-site specific i.e. they apply to any proposals located within the settlement, or indeed, outside of the settlement.</p> <p>Since they relate to effects on off-site Natura designations it is considered that they are addressed more appropriately through the Habitats Regulations Appraisal.</p>	No change to the SEA.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		<p>European Protected Species, so this also needs consideration as part of the assessments.</p> <p>The assessments also need to include consideration of the two Deeside capercaillie Special Protection Areas (SPAs), Ballochbuie and Glen Tanar. Capercaillie are sensitive to disturbance from human activity on foot (particularly off-lead dog walking) and by bike. Woodlands outwith SPAs provide additional habitat that supports the population of capercaillie within SPAs. This means that impacts in one location supporting capercaillie (whether an SPA or supporting woodland) may have an effect on other capercaillie SPAs in the wider area. Cumulative effects caused by existing or planned proposals in combination with the individual allocation also need to be considered.</p>		
	Aviemore, THC031 (An Camas Mor extended area)	While we agree that objective 6a has a pre-mitigation score of “- -“, the assessment does not mention the River Spey SAC or Site of Special Scientific Interest (SSSI), which runs	The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No	No change to the SEA.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		<p>along the western boundary of the extended allocation site. The impacts identified under objectives 3a and 3b also have the potential to cause likely significant effects on the qualifying interests of SAC. An additional impact that should also be recognised is potential disturbance of otter, one of the qualifying interests of the SAC and a notified feature of the SSSI, from increased human activity (particularly dog walking) along the banks of the river.</p> <p>Otter are also a European Protected Species, so the potential for adverse impacts on them as a protected species should also be recognised under objective 6a.</p>	<p>amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.</p>	
	Aviemore, THC007 – THC014	<p>We disagree with the -mitigation scoring for objective 6a and recommend that it is changed to ‘-’, if not ‘- -’. This is because of the potential for likely significant effects on the qualifying interests of the River Spey SAC (e.g. from development activities affecting water quality), and Badenoch and Strathspey capercaillie</p>	<p>The CNPA agrees with the comment and proposes that the factors be taken into account in the assessment of allocation MI, which is a composite of site THC007-THC014.</p>	<p>Account for potential effects on River Spey SAC and Kinveachy Forest SPA in assessment of MI.</p>

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		Special Protection Areas (SPAs), particularly Kinveachy Forest SPA (e.g. through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). The potential for impacts on these areas protected for nature conservation should be recognised under objective 6a.		
	Aviemore, THC045 and THC059	The assessment does not mention the potential for a likely significant effect on Badenoch and Strathspey SPAs with capercaillie as qualifying interests, particularly Kinveachy Forest SPA (e.g. through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). For THC059, additional consideration is required as to how the A9 dualling will affect access opportunities into Kinveachy forest in particular. The potential for impacts on these areas protected for nature	The CNPA agree with the recommendations.	Take account of these factors in the assessment of site LTHI.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		conservation should be recognised under objective 6a, and consideration given as to whether the pre-mitigation impacts would be more appropriately scored as ‘- - ‘.		
	Aviemore, THC061	We disagree with the “” scoring for objective 6a and recommend that it is changed to ‘-‘ at least, if not ‘- -‘. This is because of the potential for likely significant effects on the qualifying interests of the River Spey SAC (e.g. from development activities affecting water quality or from human activity causing disturbance of otter), and Badenoch and Strathspey capercaillie SPAs, particularly Kinveachy Forest SPA (e.g. through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). Additional consideration is required as to how the A9 dualling will affect access opportunities into Kinveachy forest in particular. The potential for impacts on these areas protected for nature	The CNPA agree with the recommendations.	Take account of these factors in the assessment of site M2.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		<p>conservation should be recognised under objective 6a.</p> <p>Otter are also a European Protected Species, so the potential for adverse impacts on them as a protected species should also be recognised under objective 6a.</p>		
	North Aviemore	<p>We disagree with the “” scoring for objective 6a and recommend that it is changed to ‘-’ at least, if not ‘- -’. This is because of the potential for likely significant effects on the qualifying interests of the River Spey SAC (e.g. from development activities affecting water quality), and Badenoch and Strathspey capercaillie SPAs, particularly Kinveachy Forest SPA (e.g. through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). Additional consideration is required as to how the A9 dualling will affect access opportunities into Kinveachy forest in particular. The potential for impacts on these areas</p>	The CNPA agree with the recommendations.	Take account of these factors in the assessment of site LTH2.



Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		<p>protected for nature conservation should be recognised under objective 6a.</p> <p>The potential for adverse impacts on the following additional protected species also require recognition under objective 6a: There are badger in the fields to the east of the A95 - badgers and their setts are legally protected under the Protection of Badgers Act 1992 (as amended). The majority of the proposed allocation is within the Northern Strathspey wildcat priority area and wildcat have been reported in this location. Wildcat are an EPS, and are sensitive to disturbance from human activity.</p>		
	Ballater, AB017	<p>We disagree with the “” scoring for objective 6a and recommend that it is changed to ‘-’. This is because of the potential for likely significant effects on the qualifying interests of the River Dee SAC, as water supplying new development may be sourced by abstraction from the Dee, and the potential for likely significant effects on capercaillie of the Deeside SPAs</p>	<p>The CNPA agree with the recommendations.</p>	<p>Take account of these factors in the assessment of site HI.</p>

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		through increased human activity causing disturbance		
	Blair Atholl, PKC004	We disagree with the “” scoring for objective 6a and recommend that it is changed to ‘-’. This is because of the potential for likely significant effects on the qualifying interests of the River Tay SAC (e.g. from development activities affecting water quality or from human activity causing disturbance of otter). The potential for impact on this area protected for nature conservation should be recognised under objective 6a. Otter are also a European Protected Species, so the potential for adverse impacts on them as a protected species should also be recognised under objective 6a.	The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.	No change to the SEA.
	Blair Atholl, PKC006	We disagree with the “” scoring for objective 6a and recommend that it is changed to ‘-’. This is because of the potential for likely significant effects on the qualifying interests of the River Tay SAC (e.g. from development activities affecting water quality or	The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are	No change to the SEA.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		<p>from human activity causing disturbance of otter). The potential for impact on this area protected for nature conservation should be recognised under objective 6a. Otter are also a European Protected Species, so the potential for adverse impacts on them as a protected species should also be recognised under objective 6a. Consideration of the potential impacts on the Glen Tilt Woods SSSI is also necessary.</p>	<p>therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.</p>	
	Boat of Garten, THC058	<p>We disagree with the ‘’ scoring for objective 6a and recommend that it is changed to ‘-’. This is because of the potential for likely significant effects on capercaillie SPAs, through increased recreation disturbance to capercaillie if economic development gives rise to increased human activity in the wider area (e.g. a bike hire shop), both alone and cumulatively with other developments affecting capercaillie SPAs</p>	<p>The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.</p>	No change to the SEA.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
	Boat of Garten, THC074 and THC075	We disagree with the “” scoring for objective 6a and recommend that it is changed to ‘-’ at least, if not ‘- -’. This is because of the potential for likely significant effects on the Badenoch and Strathspey capercaillie SPAs through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs. The potential for impacts on these areas protected for nature conservation should be recognised under objective 6a.	The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.	No change to the SEA.
	Braemar, AB002	While we agree that SEA objective 6a scores “- -”, the assessment does not mention the potential for likely significant effects on Morrone Birkwood SAC (consideration is required of potential impacts caused by changes in hydrology impacting on habitats) or the River Dee SAC (there appears to be watercourse connectivity to the SAC so pollution may affect water quality, in addition to water supplying new development	The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into	No change to the SEA.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		potentially being sourced by abstraction from the Dee), or the potential for likely significant effects on capercaillie of the Deeside SPAs through increased human activity causing disturbance.. The potential for impacts on these areas protected for nature conservation should be recognised under objective 6a.	account.	
	Braemar, AB003	While we agree that SEA objective 6a scores “- -“, the assessment does not directly refer to the potential for likely significant effects on Morrone Birkwood SAC (consideration is required of potential impacts caused by changes in hydrology impacting on habitats) or the River Dee SAC (there appears to be watercourse connectivity to the SAC so pollution may affect water quality, in addition to water supplying new development potentially being sourced by abstraction from the Dee), or the potential for likely significant effects on capercaillie of the Deeside SPAs through increased human activity causing disturbance. The potential for	The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.	No change to the SEA.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		impacts on these areas protected for nature conservation should be recognised under objective 6a.		
	Braemar, AB004 and AB005	The assessment does not mention the potential for likely significant effects on the River Dee SAC (there appears to be watercourse connectivity to the SAC so pollution may affect water quality, in addition to water supplying new development potentially being sourced by abstraction from the Dee). AB005 also needs to recognised the potential for likely significant effects on capercaillie of the Deeside SPAs through increased human activity causing disturbance. The potential for impacts on these areas protected for nature conservation should be recognised under objective 6a.	The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.	No change to the SEA.
	Braemar, AB006 and AB007	The assessment does not mention the potential for likely significant effects on Morrone Birkwood SAC (consideration is required of potential impacts caused by changes in hydrology impacting on habitats) or the River Dee SAC (there appears to	The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are	No change to the SEA.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		<p>be watercourse connectivity to the SAC so pollution may affect water quality, in addition to water supplying new development potentially being sourced by abstraction from the Dee), or the potential for likely significant effects on capercaillie of the Deeside SPAs (through increased human activity causing disturbance). Consideration of the potential impacts on the Morrone Birkwood SSSI is also necessary. The potential for impacts on these areas protected for nature conservation should be recognised under objective 6a.</p>	<p>therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.</p>	
	Braemar, AB009	<p>The assessment does not mention the potential for likely significant effects on the River Dee SAC (there appears to be watercourse connectivity to the SAC so pollution may affect water quality, in addition to water supplying new development potentially being sourced by abstraction from the Dee). The potential for impacts on this area protected for nature conservation should be recognised under objective 6a.</p>	<p>The CNPA agree with the recommendations relating to the River Dee SAC. The comments relating to water abstraction are however not site specific.</p>	<p>Take account of these factors in the assessment of site H4.</p>

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
	Braemar, AB021	We disagree with the “” scoring for objective 6a and recommend that it is changed to ‘-’. This is because of the potential for likely significant effects on the River Dee SAC if the car park is surfaced with material unable to withstand flood events, which could result in fine particle pollution in run-off or exacerbate flood events. The potential for impacts on this area protected for nature conservation should be recognised under objective 6a.	The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.	No change to the SEA.
	Braemar, AB022 and AB024	The assessment does not mention the potential for likely significant effects on the River Dee SAC (from development activities affecting water quality, in addition to water supplying new development potentially being sourced by abstraction from the Dee), or the potential for likely significant effects on capercaillie of the Deeside SPAs through increased human activity causing disturbance. The potential for impacts on these areas protected for nature conservation should be recognised under objective	<p>The CNPA agree with the recommendations with reference to River Dee SAC and water quality.</p> <p>The comment on water abstraction is not a site specific effect.</p> <p>AB024 is not proposed for allocation and therefore no changes need in that regard.</p>	Take account of these factors in the assessment of site H5.



Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		6a.		
	Carrbridge, H1/THC033, H2/THC034, THC057, THC066 - 069	The assessment does not mention the potential for a likely significant effect on Badenoch and Strathspey SPAs with capercaillie as qualifying interests, particularly Kinveachy Forest SPA (e.g. through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). Particular consideration is required as to how the A9 dualling will affect access opportunities to/from Carrbridge into Kinveachy forest in particular. The potential for impacts on these areas protected for nature conservation should be recognised under objective 6a, and consideration given as to whether the pre-mitigation impacts would be more appropriately scored as ‘ - - ‘.	The effects described within this comment are non-site specific i.e. they apply to any proposals located within the settlement, or indeed, outside of the settlement.  Since they relate to effects on off-site Natura designations it is considered that they are addressed more appropriately through the Habitats Regulations Appraisal.	No change to the SEA.
	Coylumbridge, THC027	The assessment does not mention the potential for a likely significant effect on Badenoch and Strathspey SPAs with capercaillie as qualifying interests	The effects described within this comment relating to capercaillie are non-site specific i.e. they apply to any proposals located	No change to the SEA.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		(e.g. through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs), or the River Spey SAC (from development activity as the River Druie, part of the SAC, is in close proximity to the site). The potential for impacts on these areas protected for nature conservation should be recognised under objective 6a, and consideration given as to whether the pre-mitigation impacts would be more appropriately scored as ‘- - ‘.	within the settlement, or indeed, outside of the settlement.  Since they relate to effects on off-site Natura designations it is considered that they are addressed more appropriately through the Habitats Regulations Appraisal.	
	Cromdale, THC018 - 020	The assessments do not mention the potential for a likely significant effect on Badenoch and Strathspey SPAs with capercaillie as qualifying interests (e.g. through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). The potential for impacts on these areas protected for nature conservation should be recognised	The effects described within this comment relating to capercaillie are non-site specific i.e. they apply to any proposals located within the settlement, or indeed, outside of the settlement.  The sites are also not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are	No change to the SEA.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		under objective 6a.	therefore necessary.	
	Cromdale, THC021	We disagree with the “?” scoring for objective 6a. This is because of the potential for likely significant effects on the River Spey SAC (from development activity due to potential connectivity with the Burn of Cromdale) and Badenoch and Strathspey capercaillie SPAs (e.g. through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). The potential for impacts on these areas protected for nature conservation should be recognised under objective 6a, and consideration given as to whether the pre-mitigation impacts would be more appropriately scored as ‘-’.	The effects described within this comment relating to capercaillie are non-site specific i.e. they apply to any proposals located within the settlement, or indeed, outside of the settlement.  The sites are also not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are therefore necessary.	No change to the SEA.
	Dalwhinnie, THC015	We disagree with the “” scoring for objective 6a and recommend that it is changed to ‘-’. This is because of the potential for likely significant effects on the qualifying interests of the River	The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No	No change to the SEA.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		Spey SAC caused by exacerbating flood risk (identified under objectives 3a and b), as the River Truim, part of the River Spey SAC, is in close proximity to the SAC. The potential for impacts on this area protected for nature conservation should be recognised under objective 6a.	amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.	
	Dalwhinnie, THC056	While we agree that SEA objective 6a has a pre-mitigation score of “-”, the assessment does not mention the River Spey SAC. The SAC is connected to the site via watercourses running into the River Truim, part of the River Spey SAC. The impacts identified under objectives 3a and 3b have the potential to cause likely significant effects on the qualifying interests of SAC. The potential for impacts on this area protected for nature conservation should be recognised under objective 6a.	The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.	No change to the SEA.
	Dinnet, AB011, AB012, AB013, AB016	The assessment does not mention the River Dee SAC. Water supplying new development may be sourced by	The effects described within this comment are non-site specific i.e. they apply to any proposals	No change to the SEA.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		<p>abstraction from the Dee, which has the potential to cause likely significant effects on the qualifying interests of the SAC. In addition, there appears to be watercourse connectivity to the SAC (AB011) / close proximity to the SAC (AB012, AB013), so sedimentation from construction activities will require consideration. For AB013 and AB016, the assessment also does not consider the potential for likely significant effects on capercaillie of the Deeside SPAs (through increased human activity causing disturbance). The potential for impact on this area protected for nature conservation should be recognised under objective 6a.</p>	<p>located within the settlement, or indeed, outside of the settlement.</p> <p>Since they relate to effects on off-site Natura designations it is considered that they are addressed more appropriately through the Habitats Regulations Appraisal.</p>	
	Dinnet, AB015	<p>The assessment does not mention the River Dee SAC. Water supplying new development may be sourced by abstraction from the Dee, which has the potential to cause likely significant effects on the qualifying interests of the SAC. The Muir of Dinnet SSSI also adjoins the site. The potential for impacts on these areas protected for</p>	<p>The effects described within this comment are non-site specific i.e. they apply to any proposals located within the settlement, or indeed, outside of the settlement.</p> <p>Since they relate to effects on off-site Natura designations it is considered that they are</p>	No change to the SEA.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		nature conservation should be recognised under objective 6a.	addressed more appropriately through the Habitats Regulations Appraisal.	
	Dulnain Bridge, THC032, THC041, THC042 and THC070	The assessment does not mention the potential for likely significant effects on the River Spey SAC (from sedimentation from construction activities entering the water due to proximity) and Badenoch and Strathspey capercaillie SPAs (through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). The potential for impacts on these areas protected for nature conservation should be recognised under objective 6a	The effects described within this comment are non-site specific i.e. they apply to any proposals located within the settlement, or indeed, outside of the settlement.  Since they relate to effects on off-site Natura designations it is considered that they are addressed more appropriately through the Habitats Regulations Appraisal.	No change to the SEA.
	Grantown on Spey, THC028, THC038, THC039, THC040, THC048, THC055, THC064	The assessments do not mention the potential for a likely significant effect on Badenoch and Strathspey SPAs with capercaillie as qualifying interests, particularly Anagach Woods SPA (e.g. through increased recreation disturbance to capercaillie due to the	The effects described within this comment are non-site specific i.e. they apply to any proposals located within the settlement, or indeed, outside of the settlement.  Since they relate to effects on off-	No change to the SEA.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). The potential for impacts on these areas protected for nature conservation should be recognised under objective 6a, and consideration given as to whether the pre-mitigation impacts would be more appropriately scored as ‘- - ‘.	site Natura designations it is considered that they are addressed more appropriately through the Habitats Regulations Appraisal.	
	Grantown on Spey, THC028, THC038, THC039 and THC040	The assessment does not mention the potential for likely significant effects on the River Spey SAC (from sedimentation from construction activities entering the water due to proximity). The potential for impacts on this area protected for nature conservation should be recognised under objective 6a	The effects described within this comment are non-site specific i.e. they apply to any proposals located within the settlement, or indeed, outside of the settlement.  Since they relate to effects on off-site Natura designations it is considered that they are addressed more appropriately through the Habitats Regulations Appraisal.	No change to the SEA.
	Kingussie, THC053	We disagree with the ‘-’ scoring for objective 6a and recommend that it is changed to ‘-‘. This is because of the potential for likely significant effects	The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included	No change to the SEA.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		on the qualifying interests of the River Spey SAC, Insh Marshes SAC, River Spey - Insh Marshes SPA (e.g. from development activities affecting water quality) as there appears to be watercourse connectivity to the SAC. The River Spey – Insh Marshes SSSI and Ramsar site cover much of the same area and so also appear to be connected to the allocation site. The potential for impacts on these areas protected for nature conservation should be recognised under objective 6a.	within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.	
	Laggan, THC065	The assessment does not mention the potential for likely significant effects on the qualifying interests of the River Spey SAC (from development activity as the site adjoins the River Mashie, part of the SAC, and appears to have watercourse connectivity with the SAC). The potential for impacts on this area protected for nature conservation should be recognised under objective 6a.	The CNPA agrees with the comment.	Take account of these factors in the assessment of site HI.
	Lynchat, THC029	We disagree with the “” scoring for	The CNPA acknowledges and	No change to the SEA.



Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		<p>objective 6a and recommend that it is changed to '-'. This is because of the potential for likely significant effects on the qualifying interests of the River Spey SAC, Insh Marshes SAC and the River Spey – Insh Marshes SPA, from development activity affecting water quality and/or flood risk (as identified under objectives 3a and 3b). The River Spey is in close proximity to the site and there appears to be connectivity to the SACs and SPA via drains and an unnamed watercourse to the east of the site. The River Spey - Insh Marshes SSSI and Ramsar site cover much of the same area as the SACs and SPA. The potential for impacts on these areas protected for nature conservation should be recognised under objective 6a.</p>	<p>agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.</p>	
	<p>Nethy Bridge, THC002, THC003</p>	<p>The assessments do not mention the potential for likely significant effects on the qualifying interests of the River Spey SAC (from development activity and/or flood risk (as identified under objectives 3a and 3b) as the sites adjoin the River Nethy (a tributary</p>	<p>The CNPA agrees with the comment.</p> <p>However, the CNPA do not agree that these sites are likely to have a negative effect on the qualifying features of SAC in</p>	<p>Take account of factors relating to the river Spey SAC in the assessment of site H1 and H2.</p>

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		and part of the SAC) with THC002 also appearing to have watercourse connectivity with the SAC), and Badenoch and Strathspey capercaillie SPAs (through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). The potential for impacts on this area protected for nature conservation should be recognised under objective 6a.	which capercaillie are a qualifying species.	
	Nethy Bridge, THC005, HI/THC035	The assessment does not mention the potential for a likely significant effect on Badenoch and Strathspey SPAs with capercaillie as qualifying interests, particularly Abernethy Forest SPA (e.g. through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). The potential for impacts on these areas protected for nature conservation should be recognised under objective 6a.	The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.	No change to the SEA.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
	Nethy Bridge, THC017	<p>The assessments do not mention the potential for likely significant effects on the qualifying interests of River Spey SAC (from development activity as the site is in close proximity to the Allt Mor, a tributary and part of the SAC, and from increased human activity (particularly dog walking) causing disturbance to otter), and Badenoch and Strathspey capercaillie SPAs (through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). The potential for impacts on this area protected for nature conservation should be recognised under objective 6a.</p> <p>Otter are also a European Protected Species (EPS), so their EPS status also needs consideration as part of the assessment for objective 6a.</p>	<p>The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.</p>	No change to the SEA.
	Nethy Bridge, THC036	<p>The assessment does not mention the potential for a likely significant effect on Badenoch and Strathspey SPAs with capercaillie as qualifying interests,</p>	<p>The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included</p>	No change to the SEA.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		<p>particularly Abernethy Forest SPA (e.g. through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting Badenoch and Strathspey capercaillie SPAs) or the Cairngorms SAC. Abernethy Forest SSSI and Abernethy NNR covers much of the same area as the SPA. The potential for impacts on these areas protected for nature conservation should be recognised under objective 6a.</p>	<p>within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.</p>	
	<p>Nethy Bridge, THC037</p>	<p>While we agree with the scoring of ‘-’ due to the inclusion of land within the Abernethy National Nature Reserve (NNR) within the proposed allocation, the assessment does not mention the potential for a likely significant effect on Badenoch and Strathspey SPAs with capercaillie as qualifying interests, particularly Abernethy Forest SPA (e.g. through increased recreation disturbance to capercaillie due to the increase in human population, both alone and</p>	<p>The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.</p>	<p>No change to the SEA.</p>

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		cumulatively with other developments affecting Badenoch and Strathspey capercaillie SPAs) or the Cairngorms SAC. Abernethy Forest SSSI and Abernethy NNR covers much of the same area as the SPA. The potential for impacts on these areas protected for nature conservation should be recognised under objective 6a.		
	Nethy Bridge, THC052	We disagree with the “” scoring for objective 6a and recommend that it is changed to ‘-’. This is because of the potential for likely significant effects on the qualifying interests of the River Spey SAC (from development activity as there appears to be watercourse connectivity to the SAC, and/or flood risk as identified under objectives 3a and 3b), or Badenoch and Strathspey capercaillie SPAs, particularly Abernethy Forest SPA (through increased recreation disturbance to capercaillie, both alone and cumulatively with other developments affecting capercaillie SPAs, if economic development generates increased human activity in the wider area, e.g.	The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.	No change to the SEA.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		bike hire shop). The potential for impacts on these areas protected for nature conservation should be recognised under objective 6a.		
	Nethy Bridge, THC060	The assessment does not mention the potential for a likely significant effect on the River Spey SAC (from development activity as the site is in close proximity to the River Nethy, a tributary and part of the River Spey SAC) or Badenoch and Strathspey capercaillie SPAs, particularly Abernethy Forest SPA (through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). The potential for impacts on these areas protected for nature conservation should be recognised under objective 6a.	The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.	No change to the SEA.
	Nethy Bridge, THC063	The assessment does not mention the potential for a likely significant effect on the River Spey SAC (from development activity as the site	The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included	No change to the SEA.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		<p>adjoins the River Nethy, a tributary and part of the SAC, and appears to have watercourse connectivity with the SAC) or Badenoch and Strathspey capercaillie SPAs, particularly Abernethy Forest SPA (through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). The potential for impacts on these areas protected for nature conservation should be recognised under objective 6a.</p>	<p>within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.</p>	
	<p>Newtonmore, THC022</p>	<p>We disagree with the “” scoring for objective 6a and recommend that it is changed to ‘-’. This is because of the potential for likely significant effects on the qualifying interests of the River Spey SAC (from flood risk as identified under objective 3a and b and/or development activities affecting water quality as the site is in close proximity to the River Calder, a tributary and part of the SAC). The potential for impacts on this area</p>	<p>The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into</p>	<p>No change to the SEA.</p>

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		protected for nature conservation should be recognised under objective 6a.	account.	
	Newtonmore, THC051	We disagree with the “?” scoring for objective 6a and recommend that it is changed to ‘-’. This is because of the proximity to the River Calder, part of the River Spey SAC, as well as part of the Insh Marshes SAC, River Spey - Insh Marshes SPA. There is potential for likely significant effects on the qualifying interests of these protected areas from development exacerbating flood risk (as identified under objective 3a and b) and/or development activities affecting water quality. The River Spey – Insh Marshes SSSI and Ramsar site are also in close proximity. The potential for impacts on these areas protected for nature conservation should be recognised under objective 6a.	The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.	No change to the SEA.
	Outwith, AB001 (Bridge of Gairn)	We disagree with the “?” scoring for objective 6a and recommend that it is changed to ‘-’. This is because of the potential for likely significant effects	The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included	No change to the SEA.



Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		on the qualifying interests of the River Dee SAC (from development activity, as it is in close proximity to the River Gairn, part of the SAC). The potential for impacts on this area protected for nature conservation should be recognised under objective 6a.	within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.	
	Outwith, PKC008, PKC009 and PKC010 (Glenshee)	We disagree with the “” scoring for objective 6a and recommend that it is changed to ‘-’. This is because of the potential for likely significant effects on the qualifying interests of the River Tay SAC (from development activity, as a watercourse appears to run through the site into the Shee Water, part of the SAC). The potential for impacts on this area protected for nature conservation should be recognised under objective 6a.	The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.	No change to the SEA.
	Outwith, THC025 (Inverdrue and Coylumbridge)	We disagree with the “” scoring for objective 6a and recommend that it is changed to ‘-’. This is because of the potential for likely significant effects	The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included	No change to the SEA.

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		<p>on the qualifying interests of the River Spey SAC (from development activity, as a watercourse in close proximity to the site runs into the River Druie, part of the SAC). Housing and economic development would need to be subject to assessment due to the potential for likely significant effects on Badenoch and Strathspey capercaillie SPAs (from increased recreation disturbance to capercaillie due to the increase in human population from housing and/or if economic development (such as a bike hire shop) generates increased human activity in the wider area, both alone and cumulatively with other developments affecting capercaillie SPAs). The potential for impacts on these areas protected for nature conservation should be recognised under objective 6a.</p>	<p>within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.</p>	
	<p>Outwith, THC026 (Inverdruie and Coylumbridge)</p>	<p>The assessment does not mention the potential for likely significant effects on Badenoch and Strathspey capercaillie SPAs (from increased recreation disturbance to capercaillie</p>	<p>The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No</p>	<p>No change to the SEA.</p>

Consultation Authority	Section of Environmental Report	Comment	Response of CNPA	Change to SEA
		if economic development (such as a bike hire shop) generates increased human activity in the wider area, both alone and cumulatively with other developments affecting capercaillie SPAs). The potential for impacts on these areas protected for nature conservation should be recognised under objective 6a.	amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.	
	Outwith, THC050 (Lynwilg)	We disagree with the “” scoring for objective 6a and recommend that it is changed to ‘-’. This is because of the potential for likely significant effects on the qualifying interests of the River Spey SAC (from development activity, as it is in close proximity to the Allt na Criche, part of the River Spey SAC, and/or from water quality and quantity impacts from abstraction and/or discharge, if proposed). The potential for impacts on this area protected for nature conservation should be recognised under objective 6a.	The CNPA acknowledges and agrees with this consultation response. The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.	No change to the SEA.