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By email to: sea.gateway@gov.scot

Ms Katie Crerar
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Our case ID: 300020251
Your ref: 01173

02 April 2019

Dear Ms Crerar

[Environmental Assessment \(Scotland\) Act 2005](#)
[01173 Finalised Environmental report - Cairngorms National Park - The Cairngorms National Park Local development plan 2020](#)

Thank you for your consultation which we received on 25 January 2019 about the above and its Environmental Report (ER). We have reviewed these documents in relation to our main area of interest for the historic environment. The first part of this response relates to the Proposed Plan, with part two focusing upon its environmental assessment.

Part 1: Proposed Plan

We have no representations to make on the Proposed Plan.

Part 2: Environmental Report

Assessment findings

The environmental report is accessible and clearly set out, and we consider that, in the main, the scoring of effects for the historic environment is appropriate. However, for the site assessments it would have been beneficial for the 'nature of effect' narrative to have taken a more analytical approach to the historic environment– in the majority of cases, the commentary simply provides baseline information without analysis of potential effects (for example, C3 Am Fasgadh or ED2 Myrtlefield Industrial Estate). This means that it is frequently unclear what the effects might be, how assessment scores have been arrived at, and misses the opportunity to identify site-specific mitigation or enhancement measures which could improve the environmental outcomes of the plan.

Mitigation

In response to the environmental assessment of the Main Issues Report, we recommended that you consider mitigation measures in more detail, being site specific where possible, and how these might be delivered. We welcome the way in which you embedded specific mitigation into the plan for site ACM An Camas Mor. This would have been an effective way of carrying the assessment through to the Plan for other sites

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where the historic environment has the potential to be affected. Identification and recording of site specific mitigation or enhancement measures could have assisted with maximising this opportunity.

Monitoring

The sites assessment (Appendix 7) identifies significant negative effects for the historic environment. It is therefore unclear on what basis you have concluded that ‘the potential [for] significantly adverse effects has not been identified by the assessment and therefore there is not a duty under the act to establish a monitoring framework.’ We welcome that, despite this conclusion, you have chosen to develop a monitoring framework. However, given the findings of the assessment, we would have expected this to include indicators to monitor effects on the historic environment. We recommend that as you finalise the monitoring framework, indicator /s relating to the historic environment are included.

In order to achieve effective monitoring, we recommend the use of indicators linked to the SEA objectives and sub-objectives to measure change. For example:

- SEA objective: Value, protect and enhance the historic and cultural environment and its assets
- Indicator: to monitor the number and outcome of planning applications where heritage assets and/or their settings are affected.

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.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Virginia Sharp who can be contacted by phone on 0131 668 8704 or by email on Virginia.Sharp@hes.scot.

Yours sincerely

Historic Environment Scotland