# Appendix 3: Boundaries and statistical areas used in the analysis of the Cairngorms National Park

### **Population and Demographics**

The population and demographic information contained within this publication is mostly based on data zones aggregated to a larger geographical area, which roughly corresponds with the area of the Cairngorms National Park.

Data zones are the standard small area geography used by the Scottish Government (SG). In general they have populations of between 500 and 1,000 residents. Data zone boundaries do not exactly match the National Park boundary and so, for the purpose of statistical analysis, data zones are included or excluded based on the 'population weighted centroid'. This is a standard procedure for assigning the population of a small geography to a large geography if the former does not wholly fit within the boundaries of the latter or lies across the border of two large geographies. This is the methodology used in National Records of

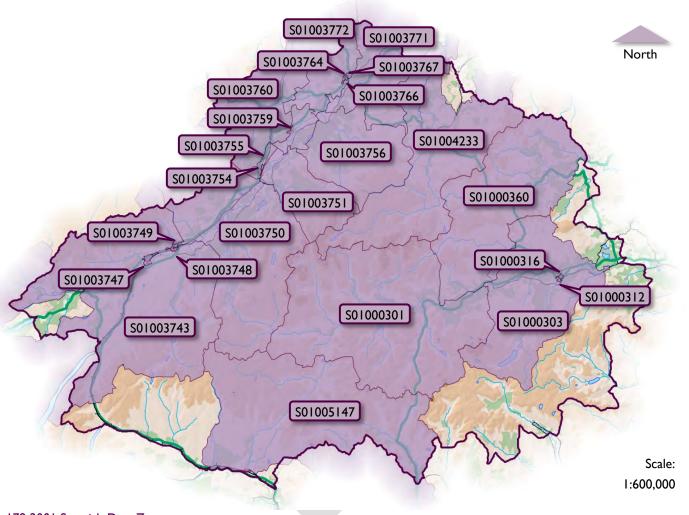
Scotland's (NRS) population projections for National Parks and Strategic Development Plan Areas (National Records of Scotland, 2014), and so for the sake of transparency and consistency, the same approach has been applied to all relevant data-sets within this document.

It should be noted that the NRS has not in the past included data zone S01005147 / S01011981 within its projections. It is assumed that this is because the data zone, which is entirely within Perth and Kinross, only became part of the National Park with the boundary change in 2010. The population weighted centroid is however within the National Park and therefore the data zone has been included within the CNPA's own analyses of the National Park's demographic and socio-economic character.

The population weighted centroid is essentially the point in the area where population density is the same all around the point, or put more simply, the population 'centre of gravity' of the area. A data zone has been allocated to the

National Park area if the population weighted centroid lies within it.

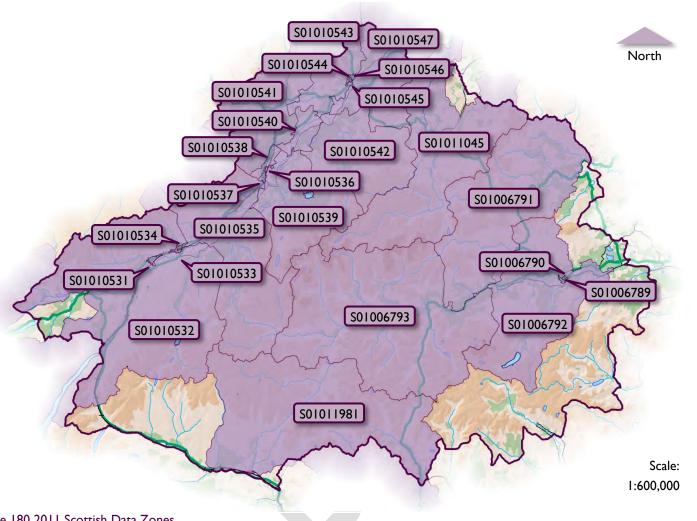
It should be noted that the Scottish Government published revised 2011 Data Zones on 6 November 2014 and that these geographies replace the original 2001 boundaries used in the NRS population projections (National Records of Scotland, 2014). At a National Park level the changes are very minor with the 2011 data zone boundaries corresponding closely with those of the 2001 ones. This however means that within this document both 2001 and 2011 data zones are used, as at the time of writing large amounts of data was not yet available in for the revised data zones. Based on this methodology, the data zones shown in Error! Reference source not found, and Error! Reference source not found. have been chosen to represent the National Park.



	ē	S01000301
	shi	S01000303
	Aberdeenshire	S01000312
	erdee	S01000316
	Abe	S01000360
		S01003743
		S01003747
es		S01003748
2001 Scottish Data Zones		S01003749
a Z		S01003750
)at		S01003751
l h	ри	S01003754
ttis	hla	S01003755
col	Highland	S01003756
<u> </u>	_	S01003759 S01003760
00		S01003760 S01003764
2		S01003764 S01003766
		S01003767
		S01003771
		S01003772
1	Moray	S01004233
	PKC	S01005147

Figure 179 2001 Scottish Data Zones

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	គ	S01006789
	ishi	S01006790
	een	S01006791
	Aberdeenshire	S01006792
	Abe	S01006793
		S01010531
		S01010532
S		S01010533
ouo		S01010534
ľ	Highland	S01010535
ata		S01010536
<u> </u>		S01010537
rist		S01010538
otí		S01010539
2011 Scottish Data Zones		S01010540
		S01010541
20		S01010542
		S01010543
		S01010544
		S01010545 S01010546
		S01010546 S01010547
	Moray	S01011045
	PKC	S01011981

Figure 180 2011 Scottish Data Zones.

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Though the actual National Park boundary does not precisely match the one derived from the data zones, the difference between the two is very small in terms of population. In 2012, data zone populations were estimated to be just 1.89% less than the overall National Park population (National Records of Scotland, 2014).

Notably, the National Park boundary does not coincide with the data zone boundary around Boultenstone and Dinnet to the east, Glen Clova to the south west, Glenlivet to the north east, and the area east of Loch Laggan. Consequently, these areas are omitted with the omission of the area around Glen Clova meaning that no part of the Angus Council area is included in the data zone boundary.

More detailed maps that show the location of population weighted centroids are available within the Scottish Neighbourhood Statistics - Boundary Mapping section of the SG website:

www.gov.scot/Topics/Statistics/sns/BoundM ap

A paper describing the methodology for calculating data zone centroids can be found on the Scottish Neighbourhood Statistics - Reference Material page of the SG website:

www.gov.scot/Topics/Statistics/sns/SNSRef

#### **Waterbodies**

SEPA are the responsible authority for monitoring water quality in Scotland to the requirements set out by the WFD. The Directive requires all water features in a category (i.e. rivers, lochs, transitional waters, coastal waters and groundwater) above a certain size threshold to be defined as waterbodies. For Scotland, this was carried out using a combination of typology data and data on ecosystem health (from both SEPA data and consultation with external stakeholders). Waterbodies are by definition of the same typology and overall quality along their length. (Scottish Environment Protection Agency, 2007).

By their nature, waterbodies do not exactly match the National Park boundary. It is also clear that factors affecting a waterbody in the upper part of a catchment area may also affect other waterbodies in its lower part. Therefore, a judgment as to the waterbodies to include in the baseline for the National Park must be made. For the purpose of this analysis, all waterbodies located within or overlapping the National Park Boundary have been selected.

Table 41 provides the reference numbers for these waterbodies and it is these that form the basis for the information presented in Figure 23 to Figure 26. Data for the whole of Scotland may be gained from:

www.environment.scotland.gov.uk/getinteractive/data/water-body-classification/

Table 43 Waterbodies within or overlapping the Cairngorms National Park.

Rive	r Spey Catchmo	ent Area	River Dee Catchment Area	South Esk Catchment Area
	Rivers		Rivers	Rivers
<b>23084</b>	≥ 23115	≥ 23141	≥ 23332	> 5800
≥ 23085	23116	23142	➤ 23339 ➤ 23352 ➤ 23363	> 5801 > 5813
<b>&gt;</b> 23086	23117	23143	> 23340 > 23353 > 23364	River Tay Catchment Area
<b>&gt;</b> 23090	23118	23144	➤ 23343  ➤ 23354  ➤ 23365	Rivers
≥ 23091	23119	23145	> 23344 > 23355 > 23366	▶ 6523
<b>&gt;</b> 23092	23121	23146	> 23345 > 23356 > 23367	<b>►</b> 6524 <b>►</b> 6599 <b>►</b> 6609
<b>&gt;</b> 23093	23122	23148	> 23346  > 23357  > 23368	> 6536 > 6600 > 6610
<b>23094</b>	23123	23149	➤ 23347  ➤ 23358  ➤ 23372	> 6540 > 6601 > 6836
<b>&gt;</b> 23095	23124	23150	➤ 23348  ➤ 23359  ➤ 23577	▶ 6541     ▶ 6602     ▶ 6911
<b>&gt;</b> 23096	23125	23151	> 23349 > 23360	▶ 6544     ▶ 6603     ▶ 6912
≥ 23097	23126	23152	≥ 23350 ≥ 23361	<b>→</b> 6545 <b>→</b> 6605 <b>→</b> 6914
≥ 23100	23127	23638	Lochs	<b>→</b> 6546 <b>→</b> 6606 <b>→</b> 6915
≥ 23101	23128	<b>&gt;</b> 23639	▶ 100192  ➤ 100202	▶ 6552 ▶ 6607
≥ 23102	23129	<b>23640</b>	River Don Catchment Area	River Lochy Catchment Area
≥ 23103	23130	≥ 23641	Rivers	Rivers
≥ 23104	23131	<b>23907</b>	≥ 23294 > 23297 > 23299	≥ 20347
≥ 23105	23132	> 23908	> 23295 > 23298 > 23578	River Deveron Catchment Area
≥ 23106	23133	> 23909	North Esk Catchment Area	Rivers
≥ 23110	23134	> 23910	Rivers	≥ 23187
≥ 23111	23136	<b>23913</b>	▶ 5702 ▶ 5704 ▶ 5722	1
≥ 23112	23137	> 23914	> 5703 > 5721 > 5723	
≥ 23113	23138		Lochs	1
≥ 23114	23140		▶ 100209	7
	Lochs			
▶ 100181	▶ 100187	▶ 100195		
▶ 100182	100189	▶ 100199		
▶ 100183	100193			

# **Appendix 4: Consultation Responses**

# **Scoping Report**

Table 44 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
		Scoping Report Co	onsultation	
Historic Environment Scotland	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 interrelationship at topic Ia, 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 Ia

Consultation Authority	Section of Scoping Report	Comment	Response of CNPA	Change to SEA
		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	The CNPA welcomes the comment and proposes a change to address the identified issue	Landscape and cultural heritage referred to on both axes of Table 3.
		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.	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.	
	Proposed Assessment Framework	We are content with the proposed assessment matrix (Table 5) and welcome that it includes scope for narrative commentary to complement	CNPA welcome the comment.	Table has been split into two.
		a scoring system and also that mitigation measures will be recorded		

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

Consultation Authority	Section of Scoping Report	Comment	Response of CNPA	Change to SEA
		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).
Scottish Environment Protection Agency	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)	For your information, we have recently updated our SEA Guidance in relation to our interests. Direct links are provided here for your convenience.  LUPS-SEA-GUI - Guidance on consideration of air in Strategic Environmental Assessment  LUPS-SEA-GU2 - Guidance on consideration of soil in Strategic Environmental  Assessment  LUPS-SEA-GU3 - Guidance on consideration of water in Strategic Environmental  Assessment  LUPS-SEA-GU4 - Guidance on consideration of material assets in Strategic Environmental  Assessment  LUPS-SEA-GU5 Guidance on consideration of human health in Strategic Environmental  Assessment	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.

Consultation Authority	Section of Scoping Report	Comment	Response of CNPA	Change to SEA
		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.

Consultation Authority	Section of Scoping Report	Comment	Response of CNPA	Change to SEA
		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.
A		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.

Consultation Authority	Section of Scoping Report	Comment	Response of CNPA	Change to SEA
		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: (I) 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

Consultation Authority	Section of Scoping Report	Comment	Response of CNPA	Change to SEA
		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.	Et voilà.
Scottish Natural Heritage	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	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	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 Ib and 2 however it is not an incompatible one, hence the conclusion in the table. Interrelationships between topics have however been identified throughout the document,	No change to the SEA.

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
		relevant to the PPS identified either directly (eg 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		
		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 eg as pollutants adversely affect biodiversity, biodiversity relies upon the feature identified (eg soils underpin the wider ecosystem), etc.	CNPA welcomes the comment and agrees.	Reference to 'Biodiversity, Fauna and Flora' made under requested PPS.

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 ot 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
		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.)		
	Appendix 2	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.	CNPA welcomes the comment and agrees.	Tables have been updated with information provided for the NPPP's final SEA, which was published in June 2017.

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, ie 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 45 Responses to consultation on MIR Environmental Report Report and the actions taken in response.

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
		MIR Environmental Repo	ort Consultation	
Historic Environment Scotland	General	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.  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.	Comment noted.	No change to the SEA.

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
	Assessment of sites	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.  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-	Comment noted.	The greater focus on the historic environment has been taken in the assessemt of the Proposed Plan.

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
		designated heritage assets, but also some sites which may affect designated heritage assets:		
		An Camas Mor: THC031 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.	The CNPA acknowledges and agrees with this consultation response.	Recognition of the SM, which is not within the site boundary, has been added to the assessment.

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
		Blair Atholl: PKC004 This non-preferred site contains or is adjacent to scheduled monument SM730 (adjacent to Clach na h'Iobairt, 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.	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 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.	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 Envirnmental Report	Comment	Response of CNPA	Change to SEA
		Braemar: AB002 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.	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.
		Inverdruie: THC025 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	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 Envirnmental Report	Comment	Response of CNPA	Change to SEA
		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.		

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
	Mitigation	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.  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, eg through action programmes, masterplanning, developer requirements etc. Wherever possible, measures should be site specific rather than generic.	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 im place to address negative effects, including site specific measures such as the need for surveys.

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
Scottish Environment Protection Agency	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 im 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 Envirnmental 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 Envirnmental Report	Comment	Response of CNPA	Change to SEA
		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.		
		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.	The CNPA acknowledges and agrees with this consultation response.	Waterbody status information used in the assessment has been updated to take account of the lastest available data.
		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		

Consultation Authority	Section of Envirnmental 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.		
	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.

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
		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 cirteria which are go beyond the SEA.	
		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'.  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	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.  With respect to the sites specifically mentioned in this consultation response:  AB023 is no longer a preferred site on the basis of an objection from SEPA on flood risk gorunds;  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	No change to the SEA.

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
		have been assessed with at least two major effects but are preferred sites.	core, PKC007 floods and PKC004 is a current caravan site with significant legal barriers to its use as a housing site;  THC031 is an existing consent projected to be delivered over the plan period and beyond and therefore needs to be taken into account;  THC068 is an existing economic development allocation and represents an ideal location for such a development, particulairly considering the limited alternative options.  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.	

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
	Existing Sites	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.  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.	The CNPA acknowledges and agrees with this consultation response.	Where required, the need for an FRA has been included within the site requierments section of the LDP.
		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.	The CNPA acknowledges and agrees with this consultation response.	The study commissioned by Aberdeenshire has been taken account of int eh site assessment and the following site specific mitigation recommended:  Adjustments to site

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
				layout to provide new open space in the areas that are at risk from flooding  Requierment 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.  Requierement for a Drainage impact assessment
	Sites not assessed	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.	Site ED3 in Kingussie was not assessed. The assessment in this Report is referenced under Kingussie ED2.  Site EP1 in Dulnain Bridge was assessed during in the Environmental Report on the	Assessments included in the Environmental Report on the Proposed Plan.

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
			MIR. The assessment in this Report is referenced under Dulnain Bridge H2.	
i	Sites where flood risk has not been identified as a negative effect	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:  Aviemore THC045 and THC059, Grantown on Spey C2, T1, and THC048,  Kingussie ED1,  Newtonmore H1,  Blair Atholl EP2, ED1, C1, PKC002, and PKC003.  Braemar AB022,  Cromdale ED1 and THC019,  Kincraig ED1, THC046, and THC054  Glenshee PKC008, PKC009 and PKC010.  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	Aviemore THC045 / 059 (now LTHI): 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.  Grantown-on-Spey THC048: This area was proposed for allocation in the Proposed for allocation in the Proposed Plan and therefore no changes are necessary.  C2: SEPA data indicates that this site is only at risk from small areas of surface water flooding. This has now been acknowledged	Acknowledge flood risk and amend assessments for sites (Objective 3a):  Kingussie: C3 and C4 Blair Atholl: T2, T3 and ED1. Cromdale: ED1  No further amendments required as sites not included within Proposed Plan.

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
		Kingussie ED1 where a large part of the site floods, we are of the opinion flood risk should be identified as negative.	in the assessment.  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.  Kingussie EDI (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.  ED3 (now ED2) is assessed fully in the Environmental Report of the Proposed Plan.	

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
			Newtonmore H1: 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.  Blair Atholl 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.	
			EDI: The whole site is affected	

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
			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.  C1 (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.  PKC003 (now H2): The area proposed for allocation is not subject to any flooding. No changes are therefore needed in	

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
			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.  PKC002: The CNPA acknowledges and that a very small area of the site is at risk from medium probability surface water flooding (<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.  Braemar  AB022 (now H5): SEPA data does not indicate that any part of this	

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
			site is at risk of fluvial or surface water flooding. The assessments conclusion of no predicted effects is therefore considered appropriate.  Cromdale ED1: It is acknowledged that a very small area of the site is affected by the medium probability river flooding zone (<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.  THC019: The CNPA acknowledges that a small area of the site is at medium risk of river flooding (<5%). The site is however not preferred and will not be included within the Proposed Plan. No amendments to the Environmental Report are	

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
			therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.  Kincraig EDI: 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.  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.	

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
			Glenshee 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.	
		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.	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).	Acknowledge flood risk and amend assessments for sites (Objective 1b):  Kingussie: C3 and C4 Blair Atholl: T2, T3 and ED1. Cromdale: ED1  No further amendments required as sites not included within Proposed Plan.

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
	Sites where potential impact on wetlands has not been identified as a negative effect	SEPA's MIR response they have	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

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
	Co-location	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: <ul> <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> <li>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.</li>	The CNPA acknowledges and agrees with this consultation response. The sites reverenced 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.	No change to the SEA.
		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	The CNPA agrees that here relevant, reference to these issues needs to be made within the assessments.	Ensure assessments in Proposed Plan take account of amenity issues relating to sites regulated by SEPA.

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
		are operating within their license parameters. These include Aviemore THC045/THC059 and Aviemore North and Dinnet AB013.		
	Proposed Mitigation Measures	SEPA note that the proposed mitigation measures for the SEA Objectives is provided in Table 9.  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.  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.	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.
		SEA Objective 1b A further mitigation measures for this objective could be tied to Objective 3a in terms of flood risk avoidance taking into account climate change	The CNPA acknowledges and agrees with this consultation response.	It is noted within the general mititgation for sites that flood resistant measures may be delivered through policies 3 and 10.

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
		and the use of flood resistant building measures.		
		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.	Comment noted, however the LDP does not contain any policies or proposals for combustion plants.	No change to the SEA.
		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.	The CNPA acknowledges and agrees with this consultation response.	Site specific mitigation has identified where FRAs and DIAs are required and these have been incorporated into the site information section of the LDP.  Where necessary site areas have been reduced where flooding is a risk, while in other instances areas which are at risk form flooding have been identified as suitable for new open space provision and, where appropriate, SuDS schemes.

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
		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.	The CNPA acknowledges and agrees with this consultation response.  Policy 3.2 requiers development to make sustainable use of resources, including water/  Policy 10.1 covers a wide range of requierments, including SuDs and buffer strips  Policy 10.2 requiers developements to incorporate SuDS as proportionate to the scale and nature of the development.	These requierments are acknowledged in the proposed mitigation measures outlined in the SEA.
		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.	The CNPA acknowledges and agrees with this consultation response.  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	According to the assessment of the site against Objective 4, site specific mitigation should include the requierement for a peat survey on site HI in Laggan.

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
			ensure negative effects do not occur.	
		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 ion sites where GWDTE may be present would help in delivering this objective.	The CNPA acknowledge the comment. Buffer strips are a requirement of Policy 10.1.	Policy 10 forms part of the the LDP's built in mitigation and this has been considered in the SEA.
	Monitoring Framework	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.	CNPA welcomes the comment and agrees with the inclusion of the additional peatland indicator.  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.	Add the following indicators to the SEA monitoring framework:  Area of peatland lost due to development  Number of new ponds created, including SuDS ponds.

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
	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 ntoe the comment and commit to set the consultation period for a minimum period of 6 weeks.	Consultaition period is set out within the Next Steps section of this report.
Scottish Natural Heritage	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 premitigation. 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.

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
		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.	No change to the SEA.

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
		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 im place to address negative effects, including site specific measures such as the need for surveys.

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
	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.	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 cumlatiuve effects of the settlement strategy are considered in this report.  It also needs to be recognised that the SEA is not the sole process of assment undertaken on the LDP. A Habitats Regulations Appriasal has also been carried out, which has	No change to SEA.

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
			resulted in an Approprioate 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 Envirnmental Report	Comment	Response of CNPA	Change to SEA
	Addendum: Site Assessments, presentation	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.  - Addendum: Site Assessments, protected areas 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	Comment noted.	Full assessments of the sites taken forward into the Proposed Plan can be found in Appendix 7.
		these allocations have the potential agos have significant environmental effects. We therefore disagree with some of the scoring and provide advice in relation to protected areas for	hal Park Authority   Appendix 6: SEA	Assessment Key 396

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
		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	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 offsite Natura designations it is considered that they are addressed more appropriately through the Habitats Regulations Appraisal.	No change to the SEA.

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
		European Protected Species, so this also needs consideration as part of the assessments.  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.		
	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 Envirnmental Report	Comment	Response of CNPA	Change to SEA
		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.  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.	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.	
	Aviemore, THC007 – THC014	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 (eg from development activities affecting water quality), and Badenoch and Strathspey capercaillie	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.	Account for potential effects on River Spey SAC and Kinveachy Forest SPA in assessment of MI.

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
		Special Protection Areas (SPAs), particularly Kinveachy Forest SPA (eg 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 (eg 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 Envirnmental 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 (eg from development activities affecting water quality or from human activity causing disturbance of otter), and Badenoch and Strathspey capercaillie SPAs, particularly Kinveachy Forest SPA (eg 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 conservation	The CNPA agree with the recommendations.	Take account of these factors in the assessment of site M2.

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
		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.		
	North Aviemore	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 (eg from development activities affecting water quality), and Badenoch and Strathspey capercaillie SPAs, particularly Kinveachy Forest SPA (eg 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	The CNPA agree with the recommendations.	Take account of these factors in the assessment of site LTH2.

Consultation Authority	Section of Envirnmental Report	Comment	Response of CNPA	Change to SEA
		protected for nature conservation should be recognised under objective 6a.  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.		
	Ballater, AB017	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	The CNPA agree with the recommendations.	Take account of these factors in the assessment of site HI.

Consultation Authority	Section of Envirnmental 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 (eg 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 (eg 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 Envirnmental Report	Comment	Response of CNPA	Change to SEA
		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.	therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.	
	Boat of Garten, THC058	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 (eg a bike hire shop), both alone and cumulatively with other developments affecting capercaillie SPAs	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 Envirnmental Report	Comment	Response of CNPA	Change to SEA
	Boat of Garten, THC074 and THC075	We disagree with the "" scoring for objective 6a andrecommend 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 Envirnmental 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 Envirnmental 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 Envirnmental Report	Comment	Response of CNPA	Change to SEA
		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.	therefore necessary. However, should the site be argued for during the examination process, then the proposer will need to take this information into account.	
	Braemar, AB009	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.	The CNPA agree with the recommendations relating to the River Dee SAC. The comments relating to water abstraction are however not site specific.	Take account of these factors in the assessment of site H4.

Consultation Authority	Section of Envirnmental 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 runoff 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	The CNPA agree with the recommendations with reference to River Dee SAC and water quality.  The comment on water abstraction is not a site specific effect.  AB024 is not proposed for allocation and therefore no changes need in that regard.	Take account of these factors in the assessment of site H5.

Consultation Authority	Section of Envirnmental 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 (eg 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 offsite 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 Envirnmental Report	Comment	Response of CNPA	Change to SEA
		(eg 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 offsite 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 (eg 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 Envirnmental 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 (eg 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 Envirnmental 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 Envirnmental Report	Comment	Response of CNPA	Change to SEA
		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.	located within the settlement, or indeed, outside of the settlement.  Since they relate to effects on offsite Natura designations it is considered that they are addressed more appropriately through the Habitats Regulations Appraisal.	
	Dinnet, AB015	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	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 offsite Natura designations it is considered that they are	No change to the SEA.

Consultation Authority	Section of Envirnmental 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 offsite 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 (eg 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 Envirnmental 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 offsite 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 Envirnmental 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 (eg 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 the 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 Envirnmental Report	Comment	Response of CNPA	Change to SEA
		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.	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.	
	Nethy Bridge, THC002, THC003	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	The CNPA agrees with the comment.  However, the CNPA do not agree that these sites are likely to have a negative effect on the qualifying features of SAC in	Take account of factors relating to the river Spey SAC in the assessment of site HI and H2.

Consultation Authority	Section of Envirnmental 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 (eg 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 Envirnmental Report	Comment	Response of CNPA	Change to SEA
	Nethy Bridge, THC017	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.  Otter are also a European Protected Species (EPS), so their EPS status also needs consideration as part of the assessment for 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, THC036	The assessment does not mention the potential for a likely significant effect on Badenoch and Strathspey SPAs with capercaillie as qualifying interests,	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 Envirnmental Report	Comment	Response of CNPA	Change to SEA
		particularly Abernethy Forest SPA (eg 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.	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.	
	Nethy Bridge, THC037	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 (eg through increased recreation disturbance to capercaillie due to the increase in human population, both alone and	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 Envirnmental 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, eg	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 Envirnmental 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 Envirnmental Report	Comment	Response of CNPA	Change to SEA
		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.	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.	
	Newtonmore, THC022	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	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 Envirnmental 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 waterquality. 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 Envirnmental 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 (Inverdruie 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 Envirnmental Report	Comment	Response of CNPA	Change to SEA
		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.	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, THC026 (Inverdruie and Coylumbridge)	The assessment does not mention the potential for likely significant effects on Badenoch and Strathspey capercaillie SPAs (from increased recreation disturbance to capercaillie	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 Envirnmental 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.

# **Appendix 5: SEA Assessment Key**

Table 46 SEA Assessment Key.

Significance of Effect	
Plan element would have a <b>major positive</b> effect in its current form as it would resolve an existing issue or maximise opportunities. <b>SIGNIFICANT.</b>	++
Plan element would have a <b>minor positive</b> effect.	+
Effect of plan element is <b>uncertain</b> .	?
Plan element would have <b>no predicted</b> effects or <b>no site specific</b> effects.	
Plan element would have a <b>minor adverse</b> effect.	-
The plan element would have a <b>major adverse</b> effect as it would create significant new problems or substantially exacerbate existing problems. Consider exclusion of option. <b>SIGNIFICANT.</b>	-

Scale and Permanence of Effect							
Local (e.g. settlement or community council level)	L						
Regional (e.g. National Park or neighbouring LA level)	R						
National (i.e. Scotland)	N						
International (i.e. trans-national boundary effects)	ı						
Permanent	P						
Temporary	т						

# Appendix 6: Assessment of Proposed Plan Vision, Strategy and Policies

## **SEA** Issue / Topic

Climatic Factors

#### **SEA** Objective(s):

la Reduce greenhouse gas emissions

#### **SEA Sub-Objectives**

- Reduce the emissions of greenhouse gases with particular focus on emissions from buildings, transport, energy generation and industry (especially CO<sub>2</sub>).
- > Encourage energy conservation and higher energy efficiency.
- > Encourage investment in cleaner technologies.
- > Support investment in suitable renewable energy sources.
- > Decouple increase in GDP and greenhouse gas emissions
- Encourage the appropriate local sourcing of materials, resources and food produce.

## **Significant Interrelationships**

Air, water, soil, material assets, population and human health.

#### Assessor(s):

Dan Harris

#### **Date of Assessment:**

13/09/2017, 14/09/2017, 15/09/2017, 19/09/2017, 21/11/2018 and 22/11/2018.

			Per	Si	gnifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
Vision							
Vision: An Outstanding National Park, enjoyed by everyone, where nature and people thrive together	While not explicitly stated, the crucial aspect of the Vision with regard to reducing GHG emissions is the link to nature and people thriving together. Such an approach requires the management of the National Park to take on principles that limit negative impacts on the environment and encourage positive change; these may have either direct or indirect positive benefits in meeting the SEA Objective. For example, promoting woodland expansion and the better management of moorland both play a strong role in the storage and sequestration of carbon.		P	+	+	+	
Spatial Strategy							
Spatial Strategy	The policy focuses development in the strategic settlements of Aviemore, Grantown-on-Spey, Kingussie and Newtonmore – along with a proposed new settlement at An Camas Mòr. Following this strategy should reduce the need to travel to access work and services and encourage alternative means of transport. The policy also supports the improvement of an integrated and sustainable walking and cycling	ı	Р	+	+	+	

			Per	Sig	nifica	nce	
Plan Element		Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
	network with better links to transport.						
Policies							
Policy I: New Housin	g Development						
1.1 Housing delivery in settlements	The policy focuses development in the strategic settlements of Aviemore, Grantown-on-Spey, Kingussie and Newtonmore – along with a proposed new settlement at An Camas Mòr. Following this strategy should reduce the need to travel to access work and services and encourage alternative means of transport. The policy also supports the improvement of an integrated and sustainable walking and cycling network with better links to transport. However, given that the policy will facilitate a growth in households and is likely to facilitate a growth in population, which does have an environmental impact with regards to climate change, the overall effect is likely to be a minor negative one.		P	-	-	-	The policy partially mitigates itself by supporting the improvement of an integrated and sustainable walking and cycling network with better links to transport. Furthermore, Policies 3, 7 and 11 have a wide range of elements that will help mitigate the negative effects of this policy on the SEA Objective, including encouraging the incorporation of renewable energy technologies into development, requiring a high standard of design and the LPA to ask for developer obligations to deliver improvements to walking and cycling infrastructure and the public transport network. The overall policy approach is supported by the Cairngorms NPPP, particular Policy 3.2.
1.2 Housing	The policy would only allow a small amount of	I	Р				

			Per	Sig	gnifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
development in existing rural groups	development in the smallest settlements and groups of houses, and would only result in a very minor increase in the number of people travelling to access work and services. The need to travel will be partially offset by the principle of Intermediate and Rural Settlements, which should provide these groups with much of their daily facilities, and negate the need for people to travel further for these services. Neutral effects have therefore been predicted						
1.3 Other housing in the countryside	for this policy.  The policy would only allow a small amount of development outwith settlements, and would only result in a very minor increase in the number of people travelling to access work and services. The need to travel will be partially offset by the principle of Intermediate and Rural Settlements, which should provide these groups with much of their daily facilities, and negate the need for people to travel further for these services. Neutral effects have therefore been predicted for this policy.	1	P				
1.4 Designing for affordability	Smaller houses are more energy efficient and have a smaller environmental impact than larger ones, therefore the policy is likely to	ı	Р	+	+	+	

			Peri	Sig	nificar	nce			
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement		
	result in minor positive effects.								
1.5 Affordable housing	There are no predicted effects associated with this policy.	1	Р						
I.6 Affordable housing exception sites	The effects of the policy depend on the location and scale of the housing proposed. The effects are therefore uncertain.	1	P	?	?	?	See Mitigation for policy 1.1.		
I.7 Alterations to existing houses	There are no predicted effects associated with this policy.	ı	P						
1.8 Conversions	There are no predicted effects associated with this policy.	1	Р						
I.9 Replacement houses	There are no predicted effects associated with this policy.	I	P						
1.10 Housing for gypsies and travellers	There are no predicted effects associated with this policy.	ı	Р						
1.11 Long term designations	Two sites have been identified in Aviemore, which is home to the greatest concentration of services within the National Park. However, the sites are currently within moderate walking distance of public transport, local facilities and housing. However, their scale allows for the creation of local shops and their integration with the public transport network.	ı	Р	-	-	•	See Mitigation for policy 1.1. It is however important to note that the development of these sites is unlikely within the Plan period.		
Policy 2: Supporting	Policy 2: Supporting Economic Growth								
2.1 Retail development	The policy supports the SEA Objective by	I	Р	+	+	+			

			Per	Sig	gnifica	nce		
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement	
and high footfall	directing development to the most suitable							
generating uses	locations and by resisting the loss of retail provision, reducing the need for people to travel elsewhere for their retail needs.							
2.2 Tourist	Developing new tourist accommodation is						See Mitigation for policy 1.1.	
accommodation	likely to result in increased journeys by private transport. The overall effects of the policy are	ı	Р	?	?	?		
	uncertain as they are entirely dependent on the location, scale and nature of the development.							
2.3 Other tourism and	Developing new tourism and leisure						See Mitigation for policy 1.1.	
leisure developments	developments is likely to result in increased journeys by private transport. The overall effects of the policy are uncertain as they are	ı	Р	?	?	?		
	entirely dependent on the location, scale and nature of the development.							
2.4 Other economic development	Developing new tourist accommodation is likely to result in increased journeys by private transport. The overall effects of the policy are	ı	Р	?	?	?	See Mitigation for policy 1.1.	
	uncertain as they are entirely dependent on the location, scale and nature of the development.							
2.5 Protecting existing economic activity	There are no predicted effects associated with this policy.	I	P					
Policy 3: Design and	Policy 3: Design and Placemaking							
3.1 Placemaking	The option promotes a high standard of design,	I	Р	++	++	++		

	Element Nature of Effect Scale Scale		Per	Sig	nificar	nce	
Plan Element		manence	Short Term	Medium Term	Long Term	Mitigation and Enhancement	
	energy efficiency, sustainably sourced materials and construction in new development and promotes active travel, the use for public transport and aims to reduce the reliance on private motorised transport.						
3.2 Major Developments	Masterplanning major developments, which may cross ownership boundaries, can help maximise opportunities to reduce the need to travel by private motor vehicle, promote walking and cycling and ensure that renewable energy resources are incorporated into developments.	-	P	++	++	++	
3.3 Sustainable Design	The option promotes a high standard of design, energy efficiency, sustainably sourced materials and construction in new development and promotes active travel, the use for public transport and aims to reduce the reliance on private motorised transport.	1	P	++	++	++	
3.4 Replacing existing building stock	There are no predicted effects associated with this policy	ı	P				
3.5 Converting existing building stock	There are no predicted effects associated with this policy	I	P				
3.6 Alterations to existing building stock	There are no predicted effects associated with this policy	I	P				

			Per	Sig	gnifica	nce			
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement		
Policy 4: Natural He	ritage								
4.1 International designations	There are no predicted effects associated with this policy	1	Р						
4.2 National designations	There are no predicted effects associated with this policy	ı	P						
4.3 Woodlands	There are opportunities for carbon sequestration through the protection and enhancement of woodlands.	I	P	+	+	+			
4.4 Protected species	There are no predicted effects associated with this policy	1	P						
4.5 Other biodiversity	There are opportunities for carbon sequestration through the protection and enhancement of biodiversity.	ı	Р	+	+	+			
4.6 All development	There are opportunities for carbon sequestration through the protection and enhancement of biodiversity.		Р	+	+	+			
Policy 5: Landscape									
5.1 Special Landscape Qualities	There are no predicted effects associated with this policy.	ı	Р						
5.2 Private Roads and Ways	There are no predicted effects associated with this policy.	ı	P						
Policy 6: The Siting a	Policy 6: The Siting and Design of Digital Communications Equipment								
Policy 6: The Siting and	There are no predicted effects associated with	I	Р						

			Per	Sig	nifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
Design of Digital Communications Equipment	this policy.						
Policy 7: Renewable I	Energy						
7.1 All renewable energy developments	The policy directs the development of renewable energy sources within the county. The initial construction of the units may have a minor negative effect on greenhouse gas emissions; however, this will be offset against in the medium and long term by the greenhouse gas emissions saved.		P	+	++	++	
7.2 Hydropower	The policy outlines additional requirements for the development of Hydropower permitted under policy 7.1. There are therefore no predicted negative or positive effects associated with this policy.	ı	Р	_			
7.3 Wind energy	The policy outlines additional requirements for the development of wind energy permitted under policy 7.1. There are therefore no predicted negative or positive effects associated with this policy.	ı	P	_			
7.4 Biomass	The policy outlines additional requirements for the development of biomass facilities permitted under policy 7.1. There are therefore no predicted negative or positive effects associated	ı	P				

			Per	Sig	nificar	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
	with this policy.						
7.5 Energy from waste	The policy outlines additional requirements for the development of energy from waste facilities permitted under policy 7.1. There are therefore no predicted negative or positive effects associated with this policy.	1	P				
7.6 Heat networks	The policy outlines additional requirements for the development of heat networks permitted under policy 7.1. There are therefore no predicted negative or positive effects associated with this policy.	1	P	_			
Policy 8: Open Space	, Sport and Recreation						
8.1 New development	There are no predicted effects associated with this policy.	1	P				
8.2 Re-development of outdoor sports facilities	There are no predicted effects associated with this policy.	I	P	_			
8.3 Re-development of other open space	There are no predicted effects associated with this policy.	I	P				
Policy 9: Cultural He	ritage						
9.1 Listed buildings	There are no predicted effects associated with this policy.	I	Р				
9.2 Cultural and historic designations	There are no predicted effects associated with this policy.	I	P				

			Per	Sig	nificai	псе	
Plan Element		Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement	
9.3 Conservation areas	There are no predicted effects associated with this policy.	1	Р				
9.4 Other cultural heritage	There are no predicted effects associated with this policy.	I	Р				
Policy 10: Resources							
10.1 Water resources	There are no predicted effects associated with this policy.	ı	Р				
10.2 Flooding	There are no predicted effects associated with this policy.	1	Р				
10.3 Connection to sewerage	There are no predicted effects associated with this policy.	1	P				
10.4 Waste management and minimisation	There are no predicted effects associated with this policy.	1	P	_			
10.5 Landfill	There are no predicted effects associated with this policy.	I	P				
10.6 Minerals	The effect of the policy will be dependent on the location of the extraction site and the transportation of the resource. New development will inevitably lead to an increase in greenhouse gasses and will therefore have an overall negative affect on the SEA Objective.	ı	Р	-	-	-	See Mitigation for policy 1.1.
10.7 Carbon sinks and stores	Protecting carbon rich soils prevents the release of climate change causing greenhouse	ı	Р	+	+	+	

			Per	Sig	nifica	nce	
Plan Element	Nature of Effect	Scale	ermanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
	gas emissions. However, development on such soils is unlikely to be significant in the first place.						
10.8 Contaminated land	There are no predicted effects associated with this policy.	1	P				
Policy II: Developer Obligations							
Policy 11: Developer Obligations	There are no predicted effects associated with this policy.	I	P				

The scale of the effects is considered to be international, with the Plan's impact on GHG emissions contributing to wider climatic changes.

The main potential negative impacts of the Plan are those associated with the predicted growth of housing and the economy, which is predicted to result in an increase in greenhouse gas emissions.

The assessment also recognises the ability of the CNPA and its partners to mitigate negative effects through the implementation of mitigation measures such as better public transport provision and improved cycling and walking networks. Indeed these measures are already built into the Plan's outcomes and policies.

Since the negative effects arise from different sources, cumulative, in-combination and synergistic effects are considered possible, but not to a great enough degree as to become significant.



Climatic Factors

### **SEA** Objective(s):

Ib Increase resilience to the effects of climate change

#### **SEA Sub-Objectives**

- Ensure that new development is appropriately located, having considered the potential effects of future climate conditions.
- Ensure infrastructure and buildings are designed to cope with future climate conditions.
- > Encourage climate change adaptation through green infrastructure.
- > Encourage existing infrastructure and buildings to adapt to cope with future climate conditions.

# **Significant Interrelationships**

Water, soil, landscape and cultural heritage, biodiversity, fauna and flora, population and human health.

#### Assessor(s):

Dan Harris

#### **Date of Assessment:**

			Per		Sig	nifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Term	Short	Medium Term	Long Term	Mitigation and Enhancement
Vision								
Vision: An Outstanding National Park, enjoyed by everyone, where nature and people thrive together	While not explicitly stated, the crucial aspect of the Vision with regard to increasing resilience to climate change is the link to nature and people thriving together. Landscape scale habitat management and natural flood management techniques, such as woodland expansion and river restoration offer means of creating rich habitats that provide important ecosystem services with regard to climate change adaptation. Therefore it may be argued that the vision plays a direct role in meeting the SEA objective.	R	P		+	+	+	
Spatial Strategy								
Spatial Strategy	Encouraging sustainable patterns of development will help ensure that it considers the potential effects of future climate conditions, deliver infrastructure and buildings are designed to cope with future climate conditions and encourage existing infrastructure and buildings to adapt to cope with future climate conditions.	R	Р		+	+	+	
Policies								

			Per	Sig	gnifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
Policy I: New Housin	g Development						
1.1 Housing delivery in settlements	Encouraging sustainable patterns of development will help ensure that it considers the potential effects of future climate conditions, deliver infrastructure and buildings are designed to cope with future climate conditions and encourage existing infrastructure and buildings to adapt to cope with future climate conditions.	R	P	+	+	+	
I.2 Housing development in existing rural groups	There are no predicted effects associated with this policy.	R	P				
I.3 Other housing in the countryside	There are no predicted effects associated with this policy.	R	P				
I.4 Designing for affordability	There are no predicted effects associated with this policy.	R	P	+	+	+	
1.5 Affordable housing	There are no predicted effects associated with this policy.	R	Р				
I.6 Affordable housing exception sites	There are no predicted effects associated with this policy.	R	Р				
1.7 Alterations to existing houses	The policy provides the opportunity to make alterations that could be designed to address the need to adapt in the face of climate change.	R	Р	+	+	+	
1.8 Conversions	There are no predicted effects associated with	R	P				

Plan Element			Per	Sig	nificar	nce	
	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
	this policy.						
1.9 Replacement houses	There are no predicted effects associated with this policy.	R	Р				
1.10 Housing for gypsies and travellers	There are no predicted effects associated with this policy.	R	Р				
I.II Long term designations	Patches of the site areas affected by the medium probability surface water flood zone. Combined these equate to less than 10%.	R	P	-	-	•	Development, whether it be on allocated sites or windfall, will need to meet the requirements of Flood Risk Management (Scotland) Act 2009, National Planning Framework 3 and Scottish Planning Policy. Under the provisions of the 2009 Act, the CNPA has carried out a Strategic Flood Risk Assessment for all sites identified for allocation within the Proposed Plan and recommends methods of managing flood risk on sites that may be subject to some risk. Where necessary, these site specific recommendations have been incorporated into the Settlement Information section of the Proposed Plan and will therefore need to be met in order for planning permission

			Per	Sig	nifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
							to be gained. Further, more detailed Flood Risk Assessments will be required on sites where they have been deemed necessary. Policies 3 and 10 have a wide range of elements relating to design and SuDS, which are applicable to all developments that will help mitigate the negative effects of this policy on the SEA Objective. Other policies may also have indirect effects in mitigating any negative effects, for example, Policies 4 and 5. It is however important to note that the development of these sites is unlikely within the Plan period.
Policy 2: Supporting	Economic Growth						
2.1 Retail development and high footfall generating uses	There are no predicted effects associated with this policy.	R	Р				
2.2 Tourist accommodation	There are no predicted effects associated with this policy.	I	P				
2.3 Other tourism and leisure developments	There are no predicted effects associated with this policy.	I	P				
2.4 Other economic	There are no predicted effects associated with		Р				

			Per	Sig	nificar	nce		
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement	
development	this policy.							
2.5 Protecting existing economic activity	There are no predicted effects associated with this policy.	1	P					
Policy 3: Design and I	Placemaking							
3.1 Placemaking	The option promotes a high standard of design, energy efficiency, sustainably sourced materials and construction in new development.	R	P	+	+	+		
3.2 Major Developments	Masterplanning major developments, which may cross ownership boundaries, can help maximise opportunities to incorporate adaptive features, for example, SuDS.	R	Р	+	+	+		
3.3 Sustainable Design	The option promotes a high standard of design, energy efficiency, sustainably sourced materials and construction in new development.	R	P	+	+	+		
3.4 Replacing existing building stock	There are no predicted effects associated with this policy.	R	P					
3.5 Converting existing building stock	There are no predicted effects associated with this policy.	R	Р					
3.6 Alterations to existing building stock	There are no predicted effects associated with this policy.	R	P					
Policy 4: Natural Heritage								
4.1 International designations	There are no predicted effects associated with this policy.	R	Р					
4.2 National	There are no predicted effects associated with	R	Р					

			Per	Sig	nifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
designations	this policy.						
4.3 Woodlands	Protecting woodland will support the SEA Objective as trees and woodlands play an important role in building resilience to climate change, for example by slowing throughflow and reducing surface water run-off.	R	P	+	+	+	
4.4 Protected species	The policy will also help species adapt to climate change by retaining habitat and, where needed, providing new habitat.	R	P	+	+	+	
4.5 Other biodiversity	The policy actively supports the SEA Objective by helping to reduce the National Park's ecological footprint. The retention and creation of new woodland habitats can play a role in slowing throughflow and reducing surface water-run-off. The policy will also help species adapt to climate change by retaining habitat and, where needed, providing new habitat.	R	P	+	+	+	
4.6 All development	The policy actively supports the SEA Objective by helping to reduce the National Park's ecological footprint. The retention and creation of new woodland habitats can play a role in slowing throughflow and reducing surface water-run-off. The policy will also help species adapt to climate change by retaining habitat and, where needed, providing new habitat.	R	P	+	+	+	

			Per	Sig	gnifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
Policy 5: Landscape							
5.1 Special Landscape Qualities	There are no predicted effects associated with this policy.	R	P				
5.2 Private Roads and Ways	There are no predicted effects associated with this policy.	R	P				
Policy 6: The Siting a	nd Design of Digital Communications Equip	ment	t				
Policy 6: The Siting and Design of Digital Communications Equipment	There are no predicted effects associated with this policy.	R	Р				
Policy 7: Renewable I	nergy						
7.1 All renewable energy developments	There are no predicted effects associated with this policy.	R	Р				
7.2 Hydropower	There are no predicted effects associated with this policy.	R	P				
7.3 Wind energy	There are no predicted effects associated with this policy.	R	P				
7.4 Biomass	There are no predicted effects associated with this policy.	R	P				
7.5 Energy from waste	There are no predicted effects associated with this policy.	R	Р				

			Per	Sig	nificar	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
7.6 Heat networks	There are no predicted effects associated with this policy.	R	P	_			
Policy 8: Open Space	, Sport and Recreation						
8.1 New development	There are no predicted effects associated with this policy.	R	Р				
8.2 Re-development of outdoor sports facilities	There are no predicted effects associated with this policy.	R	P	_	_		
8.3 Re-development of other open space	There are no predicted effects associated with this policy.	R	P				
Policy 9: Cultural He	ritage						
9.1 Listed buildings	There are no predicted effects associated with this policy.	R	P				
9.2 Cultural and historic designations	There are no predicted effects associated with this policy.	R	P				
9.3 Conservation areas	There are no predicted effects associated with this policy.	R	Р				
9.4 Other cultural heritage	There are no predicted effects associated with this policy.	R	Р				
Policy 10: Resources							
10.1 Water resources	The policy's requirement that development minimise the use of treated and abstracted	R	P	+	+	+	

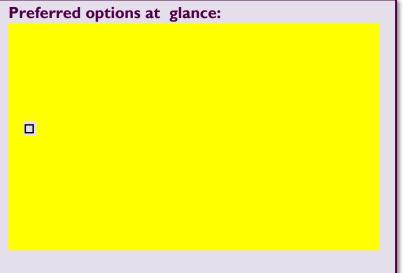
			Per	Sig	nificar	nce			
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement		
	water supports the SEA Objective.								
10.2 Flooding	The policy's requirement that development take into account the impacts of climate change supports the SEA Objective.	R	P	+	+	+			
10.3 Connection to sewerage	There are no predicted effects associated with this policy.	R	Р						
10.4 Waste management and minimisation	There are no predicted effects associated with this policy.	R	Р		_				
10.5 Landfill	There are no predicted effects associated with this policy.	R	Р						
10.6 Minerals	There are no predicted effects associated with this policy.	R	P						
10.7 Carbon sinks and stores	There are no predicted effects associated with this policy.	R	P						
10.8 Contaminated land	There are no predicted effects associated with this policy.	R	P						
Policy II: Developer	Policy 11: Developer Obligations								
Policy 11: Developer Obligations	There are no predicted effects associated with this policy.	R	Р						

Potential effects are considered to be regional in scale on the basis that the implementation of adaptation measures mostly benefits the location they are developed in.

The only negative effect has been identified against Policy 1.11. This is however a site based issue and an extremely minor one at that. It is not considered to have any bearing on the overall sustainability of the Plan. It is also important to note that the development of these sites in question is unlikely within the Plan period and therefore it is probable that no negative effects occur at all.

A considerable number of options are considered to have no predicted effects. This is due to the very specific nature of many of the Proposed Plan policies, while others have no relevance to climate adaptation.

The greatest positive effects therefore reflect the plan's approach to managing and reducing the effects of flood risk.



Air

### **SEA** Objective(s):

2 Protect and enhance air quality

#### **SEA Sub-Objectives**

- Reduce levels of the UK National Air Quality pollutants (e.g. NO<sub>2</sub>, PM<sub>10</sub>, SO<sub>2</sub>).
- ➤ Reduce levels of ground-level ozone (O₃).
- > Reduce the need for travel, through appropriate siting of new developments and provision of public infrastructure.
- > Reduce negative effects of power generation, industry and transport on local air quality.
- > Contribute towards reducing levels of stratospheric ozone depletions.
- Encourage appropriate cleaner technology for power generation, industry and transport.
- Reduce levels of acid deposition.
- Reduce levels of ammonia deposition.

### **Significant Interrelationships**

Water, soil biodiversity, fauna and flora, population and human health.

# Assessor(s):

Dan Harris

#### **Date of Assessment:**

			Per		Sig	nificar	nce	
Plan Element	Nature of Effect	Scale	Permanence	Term	Short	Medium Term	Long Term	Mitigation and Enhancement
Vision								
Vision: An Outstanding National Park, enjoyed by everyone, where nature and people thrive together	While not explicitly stated, the crucial aspect of the Vision with regard to protecting and enhancing air quality is the link to nature and people thriving together. For example, the protection and expansion of woodlands will have some indirect positive effects on air quality.	L	P	+	+	+	+	
Spatial Strategy								
Spatial Strategy	The policy focuses development in the strategic settlements of Aviemore, Grantown-on-Spey, Kingussie and Newtonmore – along with a proposed new settlement at An Camas Mòr. Following this strategy should reduce the need to travel to access work and services and encourage alternative means of transport. The policy also supports the improvement of an integrated and sustainable walking and cycling network with better links to transport.	L	Р	-	+	+	+	
Policies								
Policy I: New Housin	g Development							

			Per	Sig	nificar	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
1.1 Housing delivery in settlements	The policy focuses development in the strategic settlements of Aviemore, Grantown-on-Spey, Kingussie and Newtonmore – along with a proposed new settlement at An Camas Mòr. Following this strategy should reduce the need to travel to access work and services and encourage alternative means of transport. The policy also supports the improvement of an integrated and sustainable walking and cycling network with better links to transport. However, given that the policy will facilitate a growth in households and is likely to facilitate a growth in population, which does have an environmental impact with regards to air quality do to an increase in car journeys, the overall effect is likely to be a minor negative one.	L	P		-	-	The policy partially mitigates itself by supporting the improvement of an integrated and sustainable walking and cycling network with better links to transport. Furthermore, Policies 3, 7 and 11 have a wide range of elements that will help mitigate the negative effects of this policy on the SEA Objective, including encouraging the incorporation of renewable energy technologies into development, requiring a high standard of design and the LPA to ask for developer obligations to deliver improvements to walking and cycling infrastructure and the public transport network. The overall policy approach is supported by the Cairngorms NPPP, particular Policy 3.2.
I.2 Housing development in existing rural groups	The policy would only allow a small amount of development in the smallest settlements and groups of houses, and would only result in a very minor increase in the number of people travelling to access work and services. The	L	P				

			Per	Sig	nifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
1.3 Other housing in the countryside	need to travel will be partially offset by the principle of Intermediate and Rural Settlements, which should provide these groups with much of their daily facilities, and negate the need for people to travel further for these services. Neutral effects have therefore been predicted for this policy.  The policy would only allow a small amount of development outwith settlements, and would only result in a very minor increase in the number of people travelling to access work and services. The need to travel will be partially offset by the principle of Intermediate and Rural Settlements, which should provide these groups with much of their daily facilities, and negate the need for people to travel further for these services. Neutral effects have therefore been predicted for this policy.	L	P				
1.4 Designing for affordability	There are no predicted effects associated with this policy.	L	P				
1.5 Affordable housing	There are no predicted effects associated with this policy.	L	Р				
I.6 Affordable housing exception sites	The effects of the policy depend on the location and scale of the housing proposed. The effects are therefore uncertain.	L	Р	?	?	?	See Mitigation for policy 1.1.

			Per	Sig	nifica	nce	
Plan Element	Plan Element Nature of Effect Scale Panence	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement	
I.7 Alterations to existing houses	There are no predicted effects associated with this policy.	L	Р				
1.8 Conversions	There are no predicted effects associated with this policy.	L	Р				
I.9 Replacement houses	There are no predicted effects associated with this policy.	L	Р				
1.10 Housing for gypsies and travellers	There are no predicted effects associated with this policy.	L	P				
I.II Long term designations	The site is within moderate walking distance of public transport, local facilities and housing. Odour issues originating from the Granish area have been reported to SEPA. This may effect site layout.	L	P	-	-	-	See Mitigation for policy 1.1. It is however important to note that the development of these sites is unlikely within the Plan period.
Policy 2: Supporting	Economic Growth						
2.1 Retail development and high footfall generating uses	The policy supports the SEA Objective by directing development to the most suitable locations and by resisting the loss of retail provision, reducing the need for people to travel elsewhere for their retail needs.	L	P	+	+	+	
2.2 Tourist accommodation	Developing new tourist accommodation is likely to result in increased journeys by private transport. The overall effects of the policy are uncertain as they are entirely dependent on the location, scale and nature of the development.	L	Р	?	?	?	See Mitigation for policy 1.1.

			Per	Sig	nificar	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
2.3 Other tourism and	Developing new tourism and leisure						See Mitigation for policy 1.1.
leisure developments	developments is likely to result in increased journeys by private transport. The overall effects of the policy are uncertain as they are entirely dependent on the location, scale and	L	P	?	?	?	
2.4 Other economic	nature of the development.  Developing new tourist accommodation is						See Mitigation for policy 1.1.
development	likely to result in increased journeys by private transport. The overall effects of the policy are uncertain as they are entirely dependent on the location, scale and nature of the development.	_	P	?	?	?	dec i neighbor for policy i.i.
2.5 Protecting existing economic activity	There are no predicted effects associated with this policy.	L	Р				
Policy 3: Design and I	Placemaking						
3.1 Placemaking	The option aims to make development easy to move around and beyond thereby promoting active travel and public transport provision and reduce the reliance on private motorised transport.	L	P	+	+	+	
3.2 Major Developments	Masterplanning major developments, which may cross ownership boundaries, can help maximise opportunities to reduce the need to travel by private motor vehicle, promote walking and cycling.	L	P	+	+	+	

	Plan Element Nature of Effect Scale Scale		Per	Sig	nificar	nce	
Plan Element		manence	Short Term	Medium Term	Long Term	Mitigation and Enhancement	
3.3 Sustainable Design	The option aims to make development easy to move around and beyond thereby promoting active travel and public transport provision and reduce the reliance on private motorised transport.	L	P	+	+	+	
3.4 Replacing existing building stock	There are no predicted effects associated with this policy.	L	P				
3.5 Converting existing building stock	There are no predicted effects associated with this policy.	L	Р				
3.6 Alterations to existing building stock	There are no predicted effects associated with this policy.	L	P				
Policy 4: Natural Her	itage						
4.1 International designations	There are no predicted effects associated with this policy.	L	Р				
4.2 National designations	There are no predicted effects associated with this policy.	L	P				
4.3 Woodlands	The protection of woodlands will have indirect positive effects on air quality.	L	P	+	+	+	
4.4 Protected species	There are no predicted effects associated with this policy.	L	P				
4.5 Other biodiversity	The protection of biodiversity will have indirect positive effects on air quality.	L	Р	+	+	+	
4.6 All development	The protection of biodiversity will have indirect positive effects on air quality.	L	P	+	+	+	

			Per	Sig	gnifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
Policy 5: Landscape							
5.1 Special Landscape Qualities	There are no predicted effects associated with this policy.	L	P				
5.2 Private Roads and Ways	There are no predicted effects associated with this policy.	L	P				
Policy 6: The Siting a	nd Design of Digital Communications Equip	ment	:				
Policy 6: The Siting and Design of Digital Communications Equipment	There are no predicted effects associated with this policy.	L	Р				
Policy 7: Renewable I	Energy						
7.1 All renewable energy developments	There are no predicted effects associated with this policy.	L	P				
7.2 Hydropower	There are no predicted effects associated with this policy.	L	Р				
7.3 Wind energy	There are no predicted effects associated with this policy.	L	P				
7.4 Biomass	There are no predicted effects associated with this policy.	L	P				
7.5 Energy from waste	There are no predicted effects associated with this policy.	L	P				
7.6 Heat networks	There are no predicted effects associated with this policy.	L	P				

			Per	Sig	nifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
Policy 8: Open Space	, Sport and Recreation						
8.1 New development	There are no predicted effects associated with this policy.	L	P				
8.2 Re-development of outdoor sports facilities	There are no predicted effects associated with this policy.	L	P		_		
8.3 Re-development of other open space	There are no predicted effects associated with this policy.	L	P				
Policy 9: Cultural He	ritage						
9.1 Listed buildings	There are no predicted effects associated with this policy.	L	P				
9.2 Cultural and historic designations	There are no predicted effects associated with this policy.	L	P				
9.3 Conservation areas	There are no predicted effects associated with this policy.	L	P				
9.4 Other cultural heritage	There are no predicted effects associated with this policy.	L	P				
Policy 10: Resources							
10.1 Water resources	There are no predicted effects associated with this policy.	L	P				
10.2 Flooding	There are no predicted effects associated with this policy.	L	P				

			Per	Sig	nificar	ice		
Plan Element	ale	Short Term	Medium Term	Long Term	Mitigation and Enhancement			
10.3 Connection to	There are no predicted effects associated with		Р					
sewerage	this policy.							
10.4 Waste management and minimisation	There are no predicted effects associated with this policy.	L	P					
10.5 Landfill	There are no predicted effects associated with this policy.	L	Р					
10.6 Minerals	Mineral extraction is likely to lead to the creation of dust, which will have a negative effect on air quality within the locality of the sites. Additionally, the transportation of aggregates requires the use of large vehicles, the emissions from which also have an effect on air quality.	1	P	-		-	See Mitigation for policy 1.1.	
10.7 Carbon sinks and stores	There are no predicted effects associated with this policy.	L	P					
10.8 Contaminated land	There are no predicted effects associated with this policy.	I	P					
Policy II: Developer	Policy II: Developer Obligations							
Policy 11: Developer Obligations	There are no predicted effects associated with this policy.	L	P					

Mapping of nitrate and particulate levels indicates that emissions from motor vehicles are greatest close to roads. The effects identified in this assessment are considered to be local in scale as they are unlikely to be problematic across the wider area.

The main potential negative impacts of the Plan on the air quality are those associated with the predicted growth of housing and the economy of the National Park.

The effects are likely to vary across the National Park, with the greatest potential for negative effects arising in Badenoch and Strathspey, where the greatest level of growth is predicted to occur. Indeed policy decisions, notably the dualling of the A9 and the development of a new settlement at An Camas Mòr, are likely to result in cumulative and in-combination effects occurring.



It is not however considered that these effects will become significant since all air quality objectives are currently being within the National Park. Furthermore, the SEA on the A9 Dualling Strategy concludes that the effects of the road's upgrade will be to reduce ambient roadside carbon, NOx and particulate levels through resultant improved traffic flows.

The assessment also recognises the ability of the CNPA and its partners to mitigate many of the negative effects through the implementation of mitigation measures such as better public transport provision. Indeed these measures are already built into the Plan's outcomes and options.

Water

### **SEA** Objective(s):

3a Reduce flood risk

#### **SEA Sub-Objectives**

- Safeguard the functional floodplain.
- > Encourage the restoration of a natural flood regime.
- > Promote land uses and habitat changes that will help to decrease run-off, stabilise slopes, and attenuate flows.
- Ensure new development is not located in areas of high or medium flood risk.
- Ensure new development does not increase flood risk on site or elsewhere.
- Increase the use of sustainable drainage systems (SuDS) in both new and refurbished developments.
- > Avoid loss of soils to non-permeable surfaces.
- > Reduce reliance on flood mitigation and hard engineered solutions.
- Increase provision to manage stormwater.

# **Significant Interrelationships**

Climatic factors, soil, biodiversity, fauna and flora, landscape and cultural heritage, population and human health.

# Assessor(s):

Dan Harris

#### **Date of Assessment:**

			Per	Sig	gnifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
Vision							
Vision: An Outstanding National Park, enjoyed by everyone, where nature and people thrive together	While not explicitly stated, the crucial aspect of the Vision with regard to reducing flood risk is the link to nature and people thriving together. Landscape scale habitat management and other natural flood management techniques, such as woodland expansion and river restoration offer means of creating rich habitats while also reducing flood risk. Therefore it may be argued that the vision plays a strong and direct role in meeting the SEA objective.	R	P	++	++	++	
Spatial Strategy							
Spatial Strategy	The policy focuses development in the strategic settlements of Aviemore, Grantown-on-Spey, Kingussie and Newtonmore — along with a proposed new settlement at An Camas Mòr. Some of the settlements in the current strategy, including Ballater in particular, have recently experienced severe flood events. However, the choice of sites in the LDP and national planning policy effectively prevent future development from increasing flood risk and therefore it is not considered that the policy is likely to have an effect on the SEA	R	P				

			Per	Sig	nifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
	objective						
Policies							
Policy I: New Housin	g Development						
I.I Housing delivery in settlements	The policy focuses development in the strategic settlements of Aviemore, Grantown-on-Spey, Kingussie and Newtonmore – along with a proposed new settlement at An Camas Mòr. Some of the settlements in the current strategy, including Ballater in particular, have recently experienced severe flood events. However, the choice of sites in the LDP and national planning policy effectively prevent future development from increasing flood risk and therefore it is not considered that the policy is likely to have an effect on the SEA objective	R	P				
1.2 Housing development in existing rural groups	By providing for limited growth in rural groups it is likely that development will to some extent alter water flow patterns. However, the limited scale of developments that will be allowed to take place combined with the appropriate location of development will minimise these effects. Overall the effects of the policy are likely to be minimal.	R	P				

			Per	Sig	nificar	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
1.3 Other housing in the countryside	By providing for limited growth outwith settlements it is likely that development will to some extent alter water flow patterns. However, the limited scale of developments that will be allowed to take place combined with the appropriate location of development will minimise these effects. Overall the effects of the policy are likely to be minimal.	R	P				
I.4 Designing for affordability	There are no predicted effects associated with this policy.	R	Р				
1.5 Affordable housing	There are no predicted effects associated with this policy.	R	P				
I.6 Affordable housing exception sites	There are no predicted effects associated with this policy.	R	Р				
1.7 Alterations to existing houses	There are no predicted effects associated with this policy.	R	P				
1.8 Conversions	There are no predicted effects associated with this policy.	R	P				
1.9 Replacement houses	There are no predicted effects associated with this policy.	R	P				
1.10 Housing for gypsies and travellers	There are no predicted effects associated with this policy.	R	P				
1.11 Long term designations	Patches of the site areas affected by the medium probability surface water flood zone.  Combined these equate to less than 10%.	R	Р	-	-	-	Development, whether it be on allocated sites or windfall, will need to meet the requirements of Flood

			Per		nificar	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
							Risk Management (Scotland) Act 2009, National Planning Framework 3 and Scottish Planning Policy. Under the provisions of the 2009 Act, the CNPA has carried out a Strategic Flood Risk Assessment for all sites identified for allocation within the Proposed Plan and recommends methods of managing flood risk on sites that may be subject to some risk. These site specific recommendations have been incorporated into the Settlement Information section of the Proposed Plan and will therefore need to be met in order for planning permission to be gained. Further, more detailed Flood Risk Assessments will be required on sites where they have been deemed necessary. Policies 3 and 10 have a wide range of elements relating to design and SuDS, which are applicable to all developments that will help mitigate the negative effects of this policy on

			Per	Sig	nifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
							the SEA Objective. Other policies may also have indirect effects in mitigating any negative effects, for example, Policies 4 and 5. It is however important to note that the development of these sites is unlikely within the Plan period.
Policy 2: Supporting	Economic Growth						
2.1 Retail development and high footfall	There are no predicted effects associated with this policy.	R	Р				
generating uses  2.2 Tourist accommodation	There are no predicted effects associated with this policy.	R	P				
2.3 Other tourism and leisure developments	There are no predicted effects associated with this policy.	R	P				
2.4 Other economic development	There are no predicted effects associated with this policy.	R	Р				
2.5 Protecting existing economic activity	There are no predicted effects associated with this policy.	R	P				
Policy 3: Design and I	Placemaking						
3.1 Placemaking	The option promotes a high standard of design in the construction in new development. This should include the implementation of SuDS schemes.	R	Р	+	+	+	

			Per	Sig	nifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
3.2 Major	Masterplanning major developments, which						
Developments	may cross ownership boundaries, can help						
	maximise opportunities to incorporate adaptive	R	P	+	+	+	
	features, that manage water flows and reduce						
	flood risk, for example, SuDS.						
3.3 Sustainable Design	The option promotes a high standard of design						
	in the construction in new development. This	R	P	+	+	+	
	should include the implementation of SuDS schemes.						
3.4 Replacing existing	There are no predicted effects associated with						
building stock	this policy.	R	Р				
3.5 Converting existing	There are no predicted effects associated with	R	Р				
building stock	this policy.	•	•				
3.6 Alterations to	There are no predicted effects associated with	R	P				
existing building stock	this policy.		•				
Policy 4: Natural Her	itage						
4.1 International	There are no predicted effects associated with	R	Р				
designations	this policy.	``					
4.2 National	There are no predicted effects associated with	R	Р				
designations	this policy.						
4.3 Woodlands	Protecting woodland will support the SEA						
	Objective as trees and woodlands play an	R	Р	+	+	+	
	important role in building resilience to climate	'`	•	_	•		
	change, for example by slowing throughflow						

Plan Element	Nature of Effect	Scale	Permanence	Significance			
				Short Term	Medium Term	Long Term	Mitigation and Enhancement
	and reducing surface water run-off.						
4.4 Protected species	There are no predicted effects associated with this policy.	R	P				
4.5 Other biodiversity	The policy actively supports the SEA Objective because the retention and creation of new woodland habitats can play a role in slowing throughflow and reducing surface water-runoff.	R	P	+	+	+	
4.6 All development	The policy actively supports the SEA Objective because the retention and creation of new woodland habitats can play a role in slowing throughflow and reducing surface water-runoff.	R	P	+	+	+	
Policy 5: Landscape							
5.1 Special Landscape Qualities	There are no predicted effects associated with this policy.	R	Р				
5.2 Private Roads and Ways	There are no predicted effects associated with this policy.	R	Р				
Policy 6: The Siting and Design of Digital Communications Equipment							
Policy 6: The Siting and Design of Digital Communications Equipment	There are no predicted effects associated with this policy.	R	P				

Plan Element	Nature of Effect	Scale	Peri	Significance			
			Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
Policy 7: Renewable I	Energy						
7.1 All renewable energy developments	The creation of hydroelectric schemes can have a positive benefit on flood risk by allowing for the control and management of abnormal flows.	R	Р	+	+	+	
7.2 Hydropower	The policy outlines additional requirements for the development of Hydropower permitted under policy 7.1. There are therefore no predicted negative or positive effects associated with this policy.	R	P	_	_		
7.3 Wind energy	The policy outlines additional requirements for the development of wind energy permitted under policy 7.1. There are therefore no predicted negative or positive effects associated with this policy.	R	P				
7.4 Biomass	The policy outlines additional requirements for the development of biomass facilities permitted under policy 7.1. There are therefore no predicted negative or positive effects associated with this policy.	R	P	_	_		
7.5 Energy from waste	The policy outlines additional requirements for the development of energy from waste facilities permitted under policy 7.1. There are therefore no predicted negative or positive effects associated with this policy.	R	Р	_			

Plan Element	Nature of Effect	Scale	Permanence	Significance			
				Short Term	Medium Term	Long Term	Mitigation and Enhancement
7.6 Heat networks	The policy outlines additional requirements for the development of heat networks permitted under policy 7.1. There are therefore no predicted negative or positive effects associated with this policy.	R	Р				
Policy 8: Open Space	, Sport and Recreation						
8.1 New development	There are no predicted effects associated with this policy.	R	P				
8.2 Re-development of outdoor sports facilities	There are no predicted effects associated with this policy.	R	P				
8.3 Re-development of other open space	There are no predicted effects associated with this policy.	R	P				
Policy 9: Cultural Heritage							
9.1 Listed buildings	There are no predicted effects associated with this policy.	R	P				
9.2 Cultural and historic designations	There are no predicted effects associated with this policy.	R	P				
9.3 Conservation areas	There are no predicted effects associated with this policy.	R	P				
9.4 Other cultural heritage	There are no predicted effects associated with this policy.	R	Р				

Plan Element	Nature of Effect	Scale	Per	Significance			
			Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
Policy 10: Resources							
10.1 Water resources	There are no predicted effects associated with this policy.	R	P				
10.2 Flooding	The policy actively supports the aims of the SEA Objective.	R	P	++	++	++	
10.3 Connection to sewerage	There are no predicted effects associated with this policy.	R	P				
10.4 Waste management and minimisation	There are no predicted effects associated with this policy.	R	Р				
10.5 Landfill	There are no predicted effects associated with this policy.	R	P				
10.6 Minerals	There are no predicted effects associated with this policy.	R	Р				
10.7 Carbon sinks and stores	Healthy carbon rich soils and the vegetation they support reduce surface water run-off. Therefore protecting them will contribute to reducing flood risk.	R	P	+	+	+	
10.8 Contaminated land	There are no predicted effects associated with this policy.	R	P				
Policy II: Developer Obligations							
Policy 11: Developer Obligations	There are no predicted effects associated with this policy.	R	Р				

The Cairngorms National Park encompasses the headwaters of three of Scotland's major rivers as well as many smaller ones. Actions taken in the upper part of these catchments may be felt downstream and therefore the scale of the identified effect is considered to be regional.

The only negative effect has been identified against Policy 1.11. This is however a site based issue and an extremely minor one at that. It is not considered to have any bearing on the overall sustainability of the Plan. It is also important to note that the development of these sites in question is unlikely within the Plan period and therefore it is probable that no negative effects occur at all.

Negative effects are only identified against one of the reasonable alternatives.

Overall it is thought that the effects of the Plan are likely to be positive, with the overarching impact of Main Issue 9 impacting on all aspects of plan implementation.



Water

### **SEA** Objective(s):

3b Maintain and improve the quality of water resources

#### **SEA Sub-Objectives**

- Ensure the water quality of rivers, lochs and ground-water is maintained or improved.
- Maintain and improve the ability of river catchments to store water.
- Conserve public water supply.
- Reduce demand for water and minimise unnecessary water use.
- Reduce diffuse pollution from urban and rural areas.
- Limit land use related pollution (particularly nitrates) on water resources.

# **Significant Interrelationships**

Climatic factors, soil, biodiversity, fauna and flora, landscape and cultural heritage, population and human health.

### Assessor(s):

Dan Harris

### **Date of Assessment:**

			Peri	Sig	gnifica	nce	
Plan Element	Plan Element Nature of Effect		Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
Vision							
Vision: An Outstanding National Park, enjoyed by everyone, where nature and people thrive together	While not explicitly stated, the crucial aspect of the Vision with regard to maintaining and improving water quality is the link to nature and people thriving together. By taking this approach the LDP must ensure that development and approaches to landscape management do not have a negative effect on the water quality of waterbodies within and flowing from the National Park.	Z	P	+	+	+	
Spatial Strategy							
Spatial Strategy	The policy focuses development in the strategic settlements of Aviemore, Grantown-on-Spey, Kingussie and Newtonmore – along with a proposed new settlement at An Camas Mòr. The level of growth, particularly in the Aviemore area, is likely to place pressure on the local water supply, with the Aviemore water treatment works only having capacity for a further 966 housing units.	N	Р	-	-	-	Development, whether it be on allocated sites or windfall, will need to meet the requirements of Flood Risk Management (Scotland) Act 2009, National Planning Framework 3 and Scottish Planning Policy. Under the provisions of the 2009 Act, the CNPA has carried out a Strategic Flood Risk Assessment for all sites identified for allocation within the Proposed Plan and recommends methods of managing flood risk on sites that may be

			Per	Sig	gnifica	nce	
Plan Element	Plan Element Nature of Effect Spin		Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
							subject to some risk. These site specific recommendations have been incorporated into the Settlement Information section of the Proposed Plan and will therefore need to be met in order for planning permission to be gained. Further, more detailed Flood Risk Assessments will be required on sites where they have been deemed necessary. Policies 3 and 10 have a wide range of elements relating to design and SuDS, which are applicable to all developments that will help mitigate the negative effects of this policy on the SEA Objective. Other policies may also have indirect effects in mitigating any negative effects, for example, Policies 4 and 5.
Policies							
Policy 1: New Housin  1.1 Housing delivery in settlements	The policy focuses development in the strategic settlements of Aviemore, Grantown-on-Spey,	N	Р	-	-	-	See Mitigation for the Settlement Strategy.
	Kingussie and Newtonmore – along with a						

			Per	Sig	nificar	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
	proposed new settlement at An Camas Mòr. The level of growth, particularly in the Aviemore area, is likely to place pressure on the local water supply, with the Aviemore water treatment works only having capacity for a further 966 housing units. Negative effects may also arise from run-off as new impermeable surfaces are created. There may		<				
I.2 Housing development in existing rural groups	be a particular risk at the time of construction.  The effects of the policy depend on the location of the housing proposed. The effects are therefore uncertain.	N	P	?	?	?	See Mitigation for the Settlement Strategy.
1.3 Other housing in the countryside	The effects of the policy depend on the location of the housing proposed. The effects are therefore uncertain.	N	Р	?	?	?	See Mitigation for the Settlement Strategy.
I.4 Designing for affordability	There are no predicted effects associated with this policy.	N	Р				
1.5 Affordable housing	There are no predicted effects associated with this policy.	N	Р				
I.6 Affordable housing exception sites	The effects of the policy depend on the location and scale of the housing proposed.  The effects are therefore uncertain.	N	Р	?	?	?	See Mitigation for the Settlement Strategy.
I.7 Alterations to existing houses	There are no predicted effects associated with this policy.	N	Р				
1.8 Conversions	There are no predicted effects associated with	N	P				

			Per	Sig	nifica	nce		
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement	
	this policy.							
1.9 Replacement houses	There are no predicted effects associated with this policy.	N	P					
1.10 Housing for gypsies and travellers	There are no predicted effects associated with this policy.	N	P					
1.11 Long term designations	Patches of the sites are affected by the medium probability surface water flood zone. Combined these equate to less than 10%. This could lead to development having a negative effect on water quality.	z	P	-	-	-	See Mitigation for the Settlement Strategy.It is however important to note that the development of these sites is unlikely within the Plan period.	
Policy 2: Supporting	Economic Growth							
2.1 Retail development and high footfall generating uses	There are no predicted effects associated with this policy.	N	Р					
2.2 Tourist accommodation	There are no predicted effects associated with this policy.	N	Р					
2.3 Other tourism and leisure developments	There are no predicted effects associated with this policy.	N	P					
2.4 Other economic development	There are no predicted effects associated with this policy.	N	P					
2.5 Protecting existing economic activity	There are no predicted effects associated with this policy.	N	P					
Policy 3: Design and	Policy 3: Design and Placemaking							
3.1 Placemaking	The option promotes a high standard of design	N	Р	+	+	+		

			Per	Sig	nificai	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
	in the construction in new development. This should include the implementation of SuDS schemes which should help increase the ability of river catchments to store water, reduce diffuse pollution and improve water quality.						
3.2 Major Developments	Masterplanning major developments, which may cross ownership boundaries, can help maximise opportunities to incorporate features that manage water flows. This includes the implementation of SuDS schemes.	N	P	+	+	+	
3.3 Sustainable Design	The option promotes a high standard of design in the construction in new development. This includes the implementation of SuDS schemes which should help increase the ability of river catchments to store water, reduce diffuse pollution and improve water quality.	N	P	+	+	+	
3.4 Replacing existing building stock	There are no predicted effects associated with this policy.	N	P				
3.5 Converting existing building stock	There are no predicted effects associated with this policy.	N	P				
3.6 Alterations to existing building stock	There are no predicted effects associated with this policy.	N	P				
Policy 4: Natural Her	itage						
4.1 International	There are no predicted effects associated with	N	P				

			Per	Sig	nificar	nce		
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement	
designations	this policy.							
4.2 National designations	There are no predicted effects associated with this policy.	N	Р					
4.3 Woodlands	The protection of woodlands will have indirect positive effects on water quality and quantity.	N	P	+	+	+		
4.4 Protected species	There are no predicted effects associated with this policy.	N	P					
4.5 Other biodiversity	The protection of biodiversity will have indirect positive effects on water quality and quantity.	N	P	+	+	+		
4.6 All development	The protection of biodiversity will have indirect positive effects on water quality and quantity.	N	P	+	+	+		
Policy 5: Landscape								
5.1 Special Landscape Qualities	There are no predicted effects associated with this policy.	N	Р					
5.2 Private Roads and Ways	There are no predicted effects associated with this policy.	N	P					
Policy 6: The Siting a	nd Design of Digital Communications Equip	ment	•					
Policy 6: The Siting and Design of Digital Communications Equipment	There are no predicted effects associated with this policy.	N	Р					
Policy 7: Renewable Energy								
7.1 All renewable	There are no predicted effects associated with	N	P					

			Per	Sig	nifica	nce	
Plan Element	0	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement	
energy developments	this policy.						
7.2 Hydropower	There are no predicted effects associated with this policy.	N	P				
7.3 Wind energy	There are no predicted effects associated with this policy.	N	P				
7.4 Biomass	There are no predicted effects associated with this policy.	N	Р				
7.5 Energy from waste	There are no predicted effects associated with this policy.	N	P				
7.6 Heat networks	There are no predicted effects associated with this policy.	N	Р				
Policy 8: Open Space	, Sport and Recreation						
8.1 New development	There are no predicted effects associated with this policy.	N	P				
8.2 Re-development of outdoor sports facilities	There are no predicted effects associated with this policy.	N	P				
8.3 Re-development of other open space	There are no predicted effects associated with this policy.	N	Р				
Policy 9: Cultural He	ritage						
9.1 Listed buildings	There are no predicted effects associated with this policy.	N	P				
9.2 Cultural and historic designations	There are no predicted effects associated with this policy.	N	P				

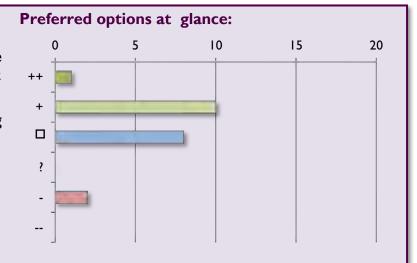
			Per	Sig	nificar	nce	
Plan Element	Plan Element Nature of Effect Sales	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement	
9.3 Conservation areas	There are no predicted effects associated with this policy.	N	P				
9.4 Other cultural heritage	There are no predicted effects associated with this policy.	N	P				
Policy 10: Resources							
10.1 Water resources	The policy actively supports the aims of the SEA Objective.	N	P	++	++	++	
10.2 Flooding	The policy ensures that development does not increase the risk of flooding, limiting the ability if pollutants to enter the water system.	N	Р	+	+	+	
10.3 Connection to sewerage	There are no predicted effects associated with this policy.	N	P				
10.4 Waste management and minimisation	There are no predicted effects associated with this policy.	N	Р	0			
10.5 Landfill	There are no predicted effects associated with this policy.	N	P				
10.6 Minerals	The development of minerals sites may have some adverse effects on water quality if water used for mining processes were to leak into the soil. Quarrying can involve dewatering and quarry process can consume water, which could put strain on the local water supply. However, the remediation of old quarries	N	P	?	?	?	See Mitigation for the Settlement Strategy.

			Peri	Sig	nificar	nce	
Plan Element	Nature of Effect	Scale	ermanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
	could include the creation of wetlands and locations for storing water.						
10.7 Carbon sinks and stores	Healthy carbon rich soils and the vegetation they support reduce surface water run-off and therefore reduces pollutants entering the water system by this means.	N	P	+	+	+	
10.8 Contaminated land	There are no predicted effects associated with this policy.	N	P				
Policy II: Developer	Obligations						
Policy 11: Developer Obligations	Developer obligations could include the requirement to upgrade water and waste water facilities.	N	P	+	+	+	

### **Summary and Conclusions:**

The Cairngorms National Park encompasses the headwaters of three of Scotland's major rivers as well as many smaller ones. Actions taken in the upper part of these catchments may be felt downstream and therefore the scale of the identified effect is considered to be regional.

Negative effects are predicted against policies that deal with economic and housing development. These largely relate to potential effects from surface-water pollutants, particularly during the construction phase and the pressure developments might place on water and waste treatment infrastructure, which in some areas does not have enough capacity to meet projected growth. It is expected however that this infrastructure be upgraded if development is to take place; therefore the overall effect of the plan are likely to be neutral or positive.



# **SEA** Issue / Topic

Soil

## **SEA** Objective(s):

4 Minimise contamination and safeguard and improve soil and peat quality.

### **SEA Sub-Objectives**

- Maintain or improve the productive capacity of soils.
- Maintain or improve the ability of farmland in the Park to sustainably produce high quality local and seasonal food.
- Avoid increased diffuse pollution, particularly SO<sub>2</sub> and NO<sub>2</sub> emissions and nitrate pollution from agriculture and other economic activities.
- Protect and enhance soil quantity (including non-chemical soil functions and processes such as permeability) and quantity, especially of carbon rich soils.
- Maintain, restore or improve the carbon storage capacity of peat and soils.
- Minimise carbon emissions from land use (e.g. muirburn).
- Avoid and reduce contamination of soils.
- > Promote the regeneration and redevelopment of brownfield and contaminated land.
- > Take account of soil function.
- Minimise soil erosion.
- Minimise soil sealing.
- Minimise soil compaction.

## **Significant Interrelationships**

Climatic factors, water, material assents, biodiversity, fauna and flora, landscape and cultural heritage, population and human health.

### Assessor(s):

Dan Harris

#### **Date of Assessment:**

13/09/2017, 14/09/2017, 15/09/2017, 19/09/2017, 21/11/2018 and 22/11/2018.

			Per	Sig	gnifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
Vision							
Vision: An Outstanding National Park, enjoyed by everyone, where nature and people thrive together	While not explicitly stated, the crucial aspect of the Vision with regard to soil quality is the link to nature and people thriving together. By taking this approach the LDP must ensure that development and approach hes to landscape management do not have a negative impact on soils, including those with a carbon rich content.	R	P	+	+	+	
Spatial Strategy							

Plan Element  Nature of Effect  The policy focuses development in the strategic settlements of Aviemore, Grantown-on-Spey, Kingussie and Newtonmore – along with a proposed new settlement at An Camas Mòr. While allocated sites in these settlements offer the ability to demand densities of development that maximise the use of land and limit the loss of soil, most sites are on greenfield land. Furthermore, An Camas Mòr is identified as an entirely new settlement on an entirely greenfield site and over the long term there is	Short Term	Medium Term	Long Term	Mitigation and Enhancement
settlements of Aviemore, Grantown-on-Spey, Kingussie and Newtonmore – along with a proposed new settlement at An Camas Mòr. While allocated sites in these settlements offer the ability to demand densities of development that maximise the use of land and limit the loss of soil, most sites are on greenfield land. Furthermore, An Camas Mòr is identified as an entirely new settlement on an entirely greenfield site and over the long term there is			J 44	
likely to be the loss of a considerable area of soil. It is important to note however that the mapping of agricultural soils indicates there are no areas of prime agricultural land in these areas, while mapping of carbon rich soils indicate that there are no areas of peat. The overall effect of the policy is therefore likely to be minor in scale.	-	-	-	While a minor negative effect has been identified, the strategy aims to minimise the loss of soil by directingdevelopment to the most sustainable locations andencouraging the coalescence of uses. Sites are also scaled so that their use is maximised through the requirement to deliver higher densities than has been the historic norm. Policies 3, 4 and 10 also have elements that will help mitigate the negative effects of this policy on the SEA Objective.

Policy I: New Housing Development

			Per	Sig	nificar	nce	
Plan Element		Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement	
1.1 Housing delivery in settlements	The policy focuses development in the strategic settlements of Aviemore, Grantown-on-Spey, Kingussie and Newtonmore – along with a proposed new settlement at An Camas Mòr. While allocated sites in these settlements offer the ability to demand densities of development that maximise the use of land and limit the loss of soil, most sites are on greenfield land. Furthermore, An Camas Mòr is identified as an entirely new settlement on an entirely greenfield site and over the long term there is likely to be the loss of a considerable area of soil. It is important to note however that the mapping of agricultural soils indicates there are no areas of prime agricultural land in these areas, while mapping of carbon rich soils indicate that there are no areas of peat. The overall effect of the policy is therefore likely to be minor in scale.	R	P		-	-	See Mitigation for the Settlement Strategy.
I.2 Housing development in existing rural groups	With little to no brownfield land andfew opportunities for densedevelopments (due to the impact thiswould have on the character of thesegroups), the impact on soil willbe greater than that in the largersettlements. However, the lowlevel of development that islikely to	R	P				

			Per	Sig	gnifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
	occur in these locations limitsthe effect on the SEA Objective.						
1.3 Other housing in the countryside	With little to no brownfield land and few opportunities for dense developments (due to the impact this would have on the character of these groups), the impact on soil will be greater than that in the larger settlements. However, the low level of development that is likely to occur in these locations limits the effect on the SEA Objective.	R	P				
I.4 Designing for affordability	Encouraging the construction of smaller houses, which have a smaller footprint, will reduce the area of soil lost, compacted or sealed and therefore the policy is likely to result in minor positive effects.	R	P	+	+	+	
I.5 Affordable housing	There are no predicted effects associated with this policy.	R	Р				
I.6 Affordable housing exception sites	The effects of the policy depend on the location and scale of the housing proposed. The effects are therefore uncertain.	R	P	?	?	?	See Mitigation for the Settlement Strategy.
I.7 Alterations to existing houses	There are no predicted effects associated with this policy.	R	P				
1.8 Conversions	There are no predicted effects associated with this policy.	R	P				
1.9 Replacement	There are no predicted effects associated with	R	Р				

	Pen		Sig	nificar	nce		
Plan Element	Nature of Effect  Scale Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement	
houses	this policy.						
1.10 Housing for gypsies and travellers	There are no predicted effects associated with this policy	R	P				
I.II Long term designations	This is a mostly greenfield site therefore there will be some soil sealing.	R	P	-	-	-	See Mitigation for the Settlement Strategy. It is however important to note that the development of these sites is unlikely within the Plan period.
Policy 2: Supporting	Economic Growth						
2.1 Retail development and high footfall generating uses	The effects of the policy depend on the location and scale of the proposed development. The effects are therefore uncertain.	R	P	?	?	?	See Mitigation for the Settlement Strategy.
2.2 Tourist accommodation	The effects of the policy depend on the location and scale of the proposed development. The effects are therefore uncertain.	R	Р	?	?	?	See Mitigation for the Settlement Strategy.
2.3 Other tourism and leisure developments	The effects of the policy depend on the location and scale of the proposed development. The effects are therefore uncertain.	R	Р	?	?	?	See Mitigation for the Settlement Strategy.
2.4 Other economic development	The effects of the policy depend on the location and scale of the proposed development. The effects are therefore	R	P	?	?	?	See Mitigation for the Settlement Strategy.

			Per	Sig	nificar	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
	uncertain.						
2.5 Protecting existing economic activity	There are no predicted effects associated with this policy	R	P				
Policy 3: Design and I	Placemaking						
3.1 Placemaking	The policy promotes high standards of sustainable design and the efficient use of land and materials in construction. The protection of high quality and carbon rich soils should therefore form part of this consideration.	R	P	+	+	+	
3.2 Major Developments	Masterplanning major developments, which may cross ownership boundaries, can help promote high standards of sustainable design and the efficient use of land and materials in construction. The protection of high quality and carbon rich soils should therefore form part of this consideration.	R	P	+	+	+	
3.3 Sustainable Design	The policy promotes high standards of sustainable design and the efficient use of land and materials in construction. The protection of high quality and carbon rich soils should therefore form part of this consideration.	R	Р	+	+	+	
3.4 Replacing existing building stock	There are no predicted effects associated with this policy.	N	P				
3.5 Converting existing	There are no predicted effects associated with	N	Р				

			Per	Sig	nifica	псе	
Plan Element	n Element Nature of Effect	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement	
building stock	this policy.						
3.6 Alterations to existing building stock	There are no predicted effects associated with this policy	R	Р				
Policy 4: Natural Hei	ritage						
4.1 International designations	There are no predicted effects associated with this policy.	N	Р				
4.2 National designations	There are no predicted effects associated with this policy.	N	P				
4.3 Woodlands	The protection of woodlands will have indirect positive effects on soil quality and quantity	R	P	+	+	+	
4.4 Protected species	There are no predicted effects associated with this policy.	N	Р				
4.5 Other biodiversity	The protection of biodiversity will have indirect positive effects on soil quality and quantity	R	Р	+	+	+	
4.6 All development	The protection of biodiversity will have indirect positive effects on soil quality and quantity	R	Р	+	+	+	
Policy 5: Landscape							
5.1 Special Landscape Qualities	There are no predicted effects associated with this policy	R	Р				
5.2 Private Roads and Ways	Having a presumption against hill track creation should help protect soils. Owing to the limited nature of the development relative to the size of the National Park, this effect is considered to be a minor one.	R	Р	+	+	+	

			Per	Sig	gnifica	nce	
Plan Element	Nature of Effect	Scale	Permanence Scale	Short Term	Medium Term	Long Term	Mitigation and Enhancement
Policy 6: The Siting a	nd Design of Digital Communications Equip	ment	ŧ				
Policy 6: The Siting and Design of Digital Communications Equipment	There are no predicted effects associated with this policy	R	Р				
Policy 7: Renewable I	Energy						
7.1 All renewable energy developments	There may be some loss of soil through the development of renewable energy sources. For example, in the case of wind turbines, the extent of the damage will also be considerably greater than the immediate footprint of the turbines. However, the exact effects of this policy are uncertain as they are dependent on the size, location and nature of any one development.	R	P	?	?	?	See Mitigation for the Settlement Strategy.
7.2 Hydropower	The policy outlines additional requirements for the development of Hydropower permitted under policy 7.1. There are therefore no predicted negative or positive effects associated with this policy.	R	Р	_	_		
7.3 Wind energy	The policy outlines additional requirements for the development of wind energy permitted under policy 7.1. There are therefore no predicted negative or positive effects associated	R	P	_			

			Per	Sig	nificai	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
	with this policy.						
7.4 Biomass	The policy outlines additional requirements for the development of biomass facilities permitted under policy 7.1. There are therefore no predicted negative or positive effects associated with this policy.	R	P	_	_		
7.5 Energy from waste	The policy outlines additional requirements for the development of energy from waste facilities permitted under policy 7.1. There are therefore no predicted negative or positive effects associated with this policy.	R	P	_	_		
7.6 Heat networks	The policy outlines additional requirements for the development of heat networks permitted under policy 7.1. There are therefore no predicted negative or positive effects associated with this policy.	R	P	_			
Policy 8: Open Space	, Sport and Recreation						
8.1 New development	There are no predicted effects associated with this policy.	R	Р				
8.2 Re-development of outdoor sports facilities	There are no predicted effects associated with this policy.	R	Р	0	_		
8.3 Re-development of other open space	There are no predicted effects associated with this policy.	R	Р				

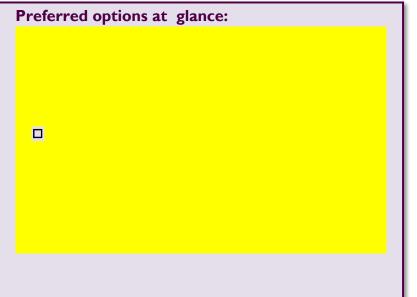
			Per	Sig	gnifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
Policy 9: Cultural He	ritage						
9.1 Listed buildings	There are no predicted effects associated with this policy.	R	Р				
9.2 Cultural and historic designations	There are no predicted effects associated with this policy.	R	P				
9.3 Conservation areas	There are no predicted effects associated with this policy.	R	P				
9.4 Other cultural heritage	There are no predicted effects associated with this policy.	R	P				
Policy 10: Resources							
10.1 Water resources	There are no predicted effects associated with this policy.	R	P				
10.2 Flooding	There are no predicted effects associated with this policy.	R	P				
10.3 Connection to sewerage	There are no predicted effects associated with this policy.	R	P				
10.4 Waste management and minimisation	There are no predicted effects associated with this policy.	R	P		_		
10.5 Landfill	There are no predicted effects associated with this policy.	R	P				
10.6 Minerals	The nature of mineral extraction will inevitably lead to some form of degradation. However, most extraction will take place in existing	R	P	-	-	-	See Mitigation for the Settlement Strategy.

			Per	Sig	nifica	nce		
Plan Element	Nature of Effect	Scale	Permanence Scale	Short Term	Medium Term	Long Term	Mitigation and Enhancement	
	quarries and the limited in scale will be required.							
10.7 Carbon sinks and stores	The policy actively supports the SEA Objective, which aims to minimise contamination and safeguard and improve soil and peat quality	R	P	++	++	++		
10.8 Contaminated land	The Policy seeks to encourages the regeneration of contaminated land.	R	P	++	++	++		
Policy II: Developer Obligations								
Policy 11: Developer Obligations	There are no predicted effects associated with this policy	R	P					

### **Summary and Conclusions:**

The effect of land use and land management decisions on soils may range from local to international in scale depending on the soils affected and the scale of the effects. While important soils, such as those with a high carbon content, have been identified within the National Park, the Plan's proposals are unlikely to impact upon them significantly. The effects identified in this assessment are therefore considered to be regional in scale.

Negative effects associated with economic growth and housing development have been identified, because the majority of this is proposed on green fields sites, previously developed land being relatively scarce within the National Park. Where available, previously developed land has been prioritised over greenfield sites. The effects are not considered to be significant, owing to the limited nature of the development that is likely to take place and the fact that the highest quality soils and the soils with the highest carbon content have been avoided as allocated sites. Naturally, uncertainty exists with regard of windfall sites.



# **SEA** Issue / Topic

Material Assets

# **SEA** Objective(s):

5 Encourage the sustainable use and reuse of material assets.

### **SEA Sub-Objective**

- > Promote decoupling of resource use from economic prosperity.
- Encourage sustainable use of natural resources e.g. water, timber, aggregates.
- Minimise the use of finite resources and promote higher resource efficiency and the use of secondary and recycled materials.
- Promote the waste hierarchy of reduce, reuse and recycle.
- > Value, conserve and enhance geodiversity.

## **Significant Interrelationships**

Climatic factors, air, water, soil, biodiversity, fauna and flora, landscape and cultural heritage, population and human health.

# Assessor(s):

Dan Harris

#### **Date of Assessment:**

13/09/2017, 14/09/2017, 15/09/2017, 19/09/2017, 21/11/2018 and 22/11/2018.

			Per	Sig	nifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
Vision							
Vision: An Outstanding National Park, enjoyed by everyone, where nature and people thrive together	While not explicitly stated, the crucial aspect of the Vision with regard to the sustainable use of material assets is the link to nature and people thriving together. By taking this approach the LDP must ensure that development and approaches to landscape management take a sustainable approach to such assets and that the resources within the National Park are not exploited without heed for other environmental and social concerns.	R	P	+	+	+	
Spatial Strategy							
Spatial Strategy	There are no predicted effects associated with the Strategy.	R	P				
Policies							
Policy I: New Housin	g Development						
I.I Housing delivery in settlements	There are no predicted effects associated with this policy.	R	Р				
1.2 Housing development in existing rural groups	There are no predicted effects associated with this policy.	R	Р				
1.3 Other housing in the countryside	There are no predicted effects associated with this policy.	R	Р				

			Per	Sig	gnificar	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
1.4 Designing for affordability	Encouraging the construction of smaller houses, which are less resource intensive and have a smaller footprint, is likely to result in minor positive effects.	R	Р	+	+	+	
1.5 Affordable housing	There are no predicted effects associated with this policy.	R	P				
I.6 Affordable housing exception sites	There are no predicted effects associated with this policy.	R	P				
1.7 Alterations to existing houses	There are no predicted effects associated with this policy.	R	Р				
1.8 Conversions	There are no predicted effects associated with this policy.	R	P				
1.9 Replacement houses	There are no predicted effects associated with this policy.	R	P				
1.10 Housing for gypsies and travellers	There are no predicted effects associated with this policy.	R	P				
I.II Long term designations	There are no predicted effects associated with this policy.	R	P				
Policy 2: Supporting	Economic Growth						
2.1 Retail development and high footfall generating uses	There are no predicted effects associated with this policy.	R	Р	_			
2.2 Tourist accommodation	There are no predicted effects associated with this policy.	R	P				

			Per	Sig	gnifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
2.3 Other tourism and leisure developments	There are no predicted effects associated with this policy.	R	Р				
2.4 Other economic development	There are no predicted effects associated with this policy.	R	Р				
2.5 Protecting existing economic activity	There are no predicted effects associated with this policy.	R	P				
Policy 3: Design and	Placemaking						
3.1 Placemaking	The policy supports the SEA objective through its support for development of appropriately located and scaled renewable energy developments and promotes high standards of sustainable design and efficient use of energy and materials in constriction.	R	P	+	+	+	
3.2 Major Developments	Masterplanning major developments, which may cross ownership boundaries, can help maximise opportunities to incorporate renewable energy resources into developments.	R	P	+	+	+	
3.3 Sustainable Design	The policy supports the SEA objective through its support for development of appropriately located and scaled renewable energy developments and promotes high standards of sustainable design and efficient use of energy and materials in constriction.	R	P	+	+	+	

			Per	Sig	gnifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
3.4 Replacing existing building stock	There are no predicted effects associated with this policy.	R	Р				
3.5 Converting existing building stock	There are no predicted effects associated with this policy.	R	Р				
3.6 Alterations to existing building stock	There are no predicted effects associated with this policy	R	P				
Policy 4: Natural Her	itage						
4.1 International designations	There are no predicted effects associated with this policy.	R	Р				
4.2 National designations	There are no predicted effects associated with this policy.	R	P				
4.3 Woodlands	The policy indirectly promotes the sustainable management of woodland resources.	R	Р	+	+	+	
4.4 Protected species	There are no predicted effects associated with this policy.	R	Р				
4.5 Other biodiversity	There are no predicted effects associated with this policy.	R	P				
4.6 All development	There are no predicted effects associated with this policy.	R	Р				
Policy 5: Landscape							
5.1 Special Landscape Qualities	There are no predicted effects associated with this policy	R	Р				
5.2 Private Roads and Ways	A presumption against the development of hill tracks should result in fewer resources and	R	P	+	+	+	

	Nature of Effect		Per	Significance			
Plan Element		Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
	materials being consumed.						
Policy 6: The Siting a	nd Design of Digital Communications Equip	ment	:				
Policy 6: The Siting and Design of Digital Communications Equipment	There are no predicted effects associated with this policy	R	P				
Policy 7: Renewable I	Energy						
7.1 All renewable energy developments	By encouraging the use of renewable energy, the demand for non-renewable sources will be reduced, having a positive effect on the SEA Objective.	R	P	+	+	+	
7.2 Hydropower	The policy outlines additional requirements for the development of Hydropower permitted under policy 7.1. There are therefore no predicted negative or positive effects associated with this policy.	R	Р	_	_		
7.3 Wind energy	The policy outlines additional requirements for the development of wind energy permitted under policy 7.1. There are therefore no predicted negative or positive effects associated with this policy.	R	P	_	_		
7.4 Biomass	The policy outlines additional requirements for the development of biomass facilities permitted under policy 7.1. There are therefore no	R	P				

	Nature of Effect		Permanence	Significance				
Plan Element		Scale		Short Term	Medium Term	Long Term	Mitigation and Enhancement	
	predicted negative or positive effects associated with this policy.							
7.5 Energy from waste	The policy outlines additional requirements for the development of energy from waste facilities permitted under policy 7.1. There are therefore no predicted negative or positive effects associated with this policy.	R	P					
7.6 Heat networks	The policy outlines additional requirements for the development of heat networks permitted under policy 7.1. There are therefore no predicted negative or positive effects associated with this policy.	R	P	_	_			
Policy 8: Open Space	, Sport and Recreation							
8.1 New development	There are no predicted effects associated with this policy.	R	Р					
8.2 Re-development of outdoor sports facilities	There are no predicted effects associated with this policy.	R	P	_				
8.3 Re-development of other open space	There are no predicted effects associated with this policy.	R	P					
Policy 9: Cultural He	Policy 9: Cultural Heritage							
9.1 Listed buildings	There are no predicted effects associated with this policy.	R	Р					
9.2 Cultural and	There are no predicted effects associated with	R	Р					

	Nature of Effect		Permanence	Significance			
Plan Element		Scale		Short Term	Medium Term	Long Term	Mitigation and Enhancement
historic designations	this policy.						
9.3 Conservation areas	There are no predicted effects associated with this policy.	R	P				
9.4 Other cultural heritage	There are no predicted effects associated with this policy.	R	P				
Policy 10: Resources							
10.1 Water resources	The Policy supports the SEA Objective's aim of encouraging the sustainable use of resources e.g. water.	R	Р	+	+	+	
10.2 Flooding	There are no predicted effects associated with this policy.	R	P				
10.3 Connection to sewerage	There are no predicted effects associated with this policy.	R	P				
10.4 Waste management and minimisation	The policy actively encourages the sustainable use and reuse of material assets, including the promotion of the waste hierarchy to reduce, reuse and recycle.	R	Р	++	++	++	
10.5 Landfill	The policy seeks to reduce the volume of waste going to landfill.	R	P	+	+	+	
10.6 Minerals	The policy seeks to encourage the sustainable use of mineral resources within the National Park. There is also an opportunity to value, conserve and enhance geodiversity through the remediation of the site.	R	P	+	+	+	Policy could be enhanced by encouraging the processing of secondary aggregate/recycled materials:

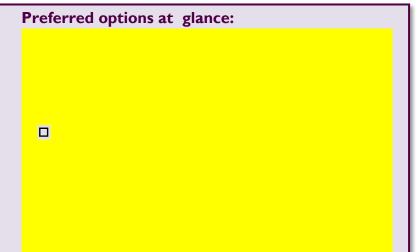
	Nature of Effect		Per	Significance				
Plan Element		Scale	ermanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement	
							"Proposals will be supported that enable a higher proportion of secondary aggregate/recycled materials to substitute for the consumption of primary aggregates; including facilities for storing, processing and recycling construction, demolition and excavation materials on construction sites and within active mineral sites and former quarries."	
10.7 Carbon sinks and stores	There are no predicted effects associated with this policy.	R	P					
10.8 Contaminated land	There are no predicted effects associated with this policy.	R	P					
Policy II: Developer	Policy I I: Developer Obligations							
Policy 11: Developer Obligations	There are no predicted effects associated with this policy.	R	P					

## **Summary and Conclusions:**

Owing to the limited nature of the identified effects, the scale of the Plan's impact on material assets is considered to be regional.

The overall effects of the Plan are considered to be positive, with policy options supporting the development of appropriately located and scaled renewable energy developments, high standards of sustainable design, the efficient use of energy and materials in constriction and sustainable land management practices.

Many policies carry no resource implications and this is reflected in the relatively high number of assessments that predict no effects.



# **SEA** Issue / Topic

Biodiversity, Fauna and Flora

### **SEA** Objective(s):

6a Value, conserve and enhance biodiversity, distinctive wild species and habitats

### **SEA Sub-Objective**

- Protect the integrity of European sites, proposed European sites and listed Ramsar sites, and to conserve or, where not at a favourable conservation status, enhance their interest features.
- Avoid damage or fragmentation of designated sites, habitats and protected species and encourage their enhancement and connection.
- > Conserve and enhance the viability and diversity of distinctive species and habitats and their connectivity.
- Avoid the introduction and spread of invasive non-native species and tree diseases.
- > Conserve, enhance and create appropriate wildlife habitats and wider biodiversity within and outwith settlements.
- > Encourage innovative methods of producing biodiversity gain for both new and existing developments.
- > Reduce the ecological footprint of the Cairngorms National Park.
- Enable people to access and appreciate the Cairngorms National Park's natural heritage.

# **Significant Interrelationships**

Climatic factors, air, water, soil, material assets, landscape and cultural heritage, population and human health.

# Assessor(s):

Dan Harris

#### **Date of Assessment:**

13/09/2017, 14/09/2017, 15/09/2017, 19/09/2017, 21/11/2018 and 22/11/2018.

Plan Element	Nature of Effect		Permanence	Significance			
		Scale		Short Term	Medium Term	Long Term	Mitigation and Enhancement
Vision							
Vision: An Outstanding National Park, enjoyed by everyone, where nature and people thrive together	The vision's objective to ensure that nature thrives within the National Park positively contributes to all aspects of the SEA objective.	ı	P	++	++	++	
Spatial Strategy							
Spatial Strategy	The policy focuses development in the strategic settlements of Aviemore, Grantown-on-Spey, Kingussie and Newtonmore – along with a proposed new settlement at An Camas Mòr. This development is to be delivered in while maintaining the integrity of designated sites, including SACs, SPAs and Ramsar sites, with mitigation proposed through the Habitats Regulations Appraisal. Overall the policy's effects are uncertain as they will depend on site specific conditions. These have been assessed individually.	1	P	?	?	?	Ecological appraisals have been carried out and have been used to inform the choice of allocations and the mitigation that may be applied to limit any negative effects they may have on biodiversity. Where necessary, these have been included within the Settlement Information Section of the Proposed Plan and their requirements will need to be met to gain planning permission. Where necessary, the requirement for further surveys has been identified. Where no site specific requirements have been identified, requirements are set out by Policy 4, which seeks to reduce any

	Nature of Effect		Per	Sig	nifica	nce	Mitigation and Enhancement
Plan Element		Scale	Permanence	Short Term	Medium Term	Long Term	
							negative effects on biodiversity, while Policies 5 and 11 also have some positive synergistic effects on the SEA Objective.  With regard to Capercaillie, the CNPA is in the process of developing a Capercaillie Framework, which it is intended the LDP support, which will:  Bring together existing knowledge on the state of Capercaillie across the Cairngorms National Park, the combined knowledge of the pressures they face, particularly with regard to recreation and housing development; and the suite of management measures currently being deployed, using spatial mapped data where possible;  inform future decisions about

			Per	Sig	nifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
							co-ordinated deployment of management measures for Capercaillie conservation; identify what else we may need to do, where we may need further investment or resources and highlight the future agenda for management action.
							The CNPA has published a report on Phase I of the Framework (2015). This takes the form of a map-based framework that helps to co-ordinate the management of the National Park with the aim of safeguarding and expanding the Capercaillie population across the area.
							Work on Phase 2 is underway and is supported by Heritage Lottery Funding. Where effects are identified from the development of sites, further funding for mitigation may be

			Per	Sig	gnifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
							levied through Policy II. The HRA on the LDP has identified the areas where this is likely to be the case and mitigation measures have been identified included within the LDP where necessary.
Policies							
Policy I: New Housin	g Development						
I.I Housing delivery in settlements	The policy focuses development in the strategic settlements of Aviemore, Grantown-on-Spey, Kingussie and Newtonmore – along with a proposed new settlement at An Camas Mòr. This development is to be delivered in while maintaining the integrity of designated sites, including SACs, SPAs and Ramsar sites, with mitigation proposed through the Habitats Regulations Appraisal. Overall the policy's effects are uncertain as they will depend on site specific conditions. These have been assessed individually.	1	P	?	?	?	See Mitigation for the Settlement Strategy.
I.2 Housing development in existing rural groups	The effects of the policy depend on the location of the housing proposed. The effects are therefore uncertain.	ı	Р	?	?	?	See Mitigation for the Settlement Strategy.
I.3 Other housing in	The effects of the policy depend on the	I	Р	?	?	?	See Mitigation for the Settlement

			Per	Sig	nificar	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
the countryside	location of the housing proposed. The effects are therefore uncertain.						Strategy.
I.4 Designing for affordability	Encouraging the construction of smaller houses, which have a smaller footprint and therefore require less land to build on, means that it is likely that less habitat is lost and result in minor positive effects.	1	P	+	+	+	
1.5 Affordable housing	There are no predicted effects associated with this policy.	1	P				
I.6 Affordable housing exception sites	The effects of the policy depend on the location and scale of the housing proposed. The effects are therefore uncertain.	1	P	?	?	?	See Mitigation for the Settlement Strategy.
I.7 Alterations to existing houses	There are no predicted effects associated with this policy.	ı	P				
1.8 Conversions	There are no predicted effects associated with this policy.	1	P				
I.9 Replacement houses	There are no predicted effects associated with this policy.	ı	P				
1.10 Housing for gypsies and travellers	There are no predicted effects associated with this policy.	ı	P				
1.11 Long term designations	The sites consist of agricultural areas interspersed with patches of mature trees. Concern is raised about the sites proximity to the Ricer Spey SAC. Due to the site's proximity to Kinveachy Forest SPA, offsite	I	Р				See Mitigation for the Settlement Strategy. It is however important to note that the development of these sites is unlikely within the Plan period.

Plan Element			Per	Sig	nificar	nce		
	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement	
	effects on capercaillie, one of the qualifying features of Kinveachy Forest SPA, could occur. There is also the potential for adverse impacts on the following protected species: badger and wildcat.							
Policy 2: Supporting	Economic Growth							
2.1 Retail development and high footfall generating uses	There are no predicted effects associated with this policy.	ı	Р					
2.2 Tourist accommodation	The effects of the policy depend on the location of the proposed development. The effects are therefore uncertain.	ı	P	?	?	?	See Mitigation for the Settlement Strategy.	
2.3 Other tourism and leisure developments	The effects of the policy depend on the location of the proposed development. The effects are therefore uncertain.	1	Р	?	?	?	See Mitigation for the Settlement Strategy.	
2.4 Other economic development	The effects of the policy depend on the location of the proposed development. The effects are therefore uncertain.	ı	Р	?	?	?	See Mitigation for the Settlement Strategy.	
2.5 Protecting existing economic activity	The effects of the policy depend on the location of the proposed development. The effects are therefore uncertain.	ı	Р	?	?	?	See Mitigation for the Settlement Strategy.	
Policy 3: Design and Placemaking								

			Per	Sig	nificar	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
3.1 Placemaking	There are no predicted effects associated with this policy.	ı	Р	0			
3.2 Major Developments	Masterplanning major developments, which may cross ownership boundaries, can be used to ensure that sensitive areas are protected and mitigation and compensatory measures are delivered in the most beneficial way.	1	P	+	+	+	
3.3 Sustainable Design	There are no predicted effects associated with this policy.	ı	Р				
3.4 Replacing existing building stock	There are no predicted effects associated with this policy.	ı	P				
3.5 Converting existing building stock	There are no predicted effects associated with this policy.	ı	P				
3.6 Alterations to existing building stock	There are no predicted effects associated with this policy.	1	P				
Policy 4: Natural Her	itage						
4.1 International designations	The policy directly supports the aims of this SEA Objective.	ı	Р	++	++	++	
4.2 National designations	The policy directly supports the aims of this SEA Objective.	ı	P	++	++	++	
4.3 Woodlands	The policy directly supports the aims of this SEA Objective.	ı	P	++	++	++	
4.4 Protected species	The policy directly supports the aims of this SEA Objective.	I	Р	++	++	++	

			Per	Sig	nifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
4.5 Other biodiversity	The policy directly supports the aims of this SEA Objective.	1	P	++	++	++	
4.6 All development	The policy directly supports the aims of this SEA Objective.	_	P	++	++	++	
Policy 5: Landscape							
5.1 Special Landscape Qualities	The option may have synergistic positive effects on biodiversity.	I	P	+	+	+	
5.2 Private Roads and Ways	The option may have synergistic positive effects on upland habitats and species.	7	P	+	+	+	
Policy 6: The Siting a	nd Design of Digital Communications Equip	ment	:				
Policy 6: The Siting and Design of Digital Communications Equipment	There are no predicted effects associated with this policy.	I	Р				
Policy 7: Renewable I	Energy						
7.1 All renewable energy developments	There are no predicted effects associated with this policy.	I	P				
7.2 Hydropower	There are no predicted effects associated with this policy.	I	P				
7.3 Wind energy	There are no predicted effects associated with this policy.	I	Р				
7.4 Biomass	There are no predicted effects associated with this policy.	I	P				

			Per	Sig	nificar	nce	
Plan Element	Plan Element Nature of Effect San Plan Element	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement	
7.5 Energy from waste	There are no predicted effects associated with this policy.	1	P				
7.6 Heat networks	There are no predicted effects associated with this policy.	ı	P				
Policy 8: Open Space	, Sport and Recreation						
8.1 New development	There are no predicted effects associated with this policy.	ı	P				
8.2 Re-development of	There are no predicted effects associated with						
outdoor sports facilities	this policy.		P				
8.3 Re-development of other open space	There are no predicted effects associated with this policy.	1	P				
Policy 9: Cultural He	ritage						
9.1 Listed buildings	There are no predicted effects associated with this policy.	1	P				
9.2 Cultural and historic designations	There are no predicted effects associated with this policy.	ı	P				
9.3 Conservation areas	There are no predicted effects associated with this policy.	ı	P				
9.4 Other cultural heritage	There are no predicted effects associated with this policy.	I	P				
Policy 10: Resources							
10.1 Water resources	The policy requires development to minimise	I	P	+	+	+	

			Per	Sig	nificar	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
	the use of abstracted water and not result in the ecological status of waterbodies.						
10.2 Flooding	There are no predicted effects associated with this policy.	ı	P				
10.3 Connection to sewerage	There are no predicted effects associated with this policy.	1	Р				
10.4 Waste management and minimisation	There are no predicted effects associated with this policy.	I	P		_	_	
10.5 Landfill	There are no predicted effects associated with this policy.	1	P				
10.6 Minerals	The policy has a presumption against the development of new mineral sites, though it does allow for amendments to and extensions of existing sites. It also requires the remediation of land after sites are closed, which providesopportunities for biodiversity enhancement, and states that all developments must take environmental considerations into account. The effects of this are uncertain as they are very much dependant on the scale location and nature, of any one development, and the standard of restoration.	1	Р	?	?	?	See Mitigation for the Settlement Strategy.
10.7 Carbon sinks and stores	Protecting healthy carbon rich soils and the habitats they support has a positive effect on	ı	P	+	+	+	

			Per	Sig	nifica	nce	
Plan Element	Nature of Effect	Scale	manence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
	the SEA objective.						
10.8 Contaminated land	There are no predicted effects associated with this policy.	1	P				
Policy II: Developer	Obligations						
Policy 11: Developer Obligations	The option offers a more effective procedural approach to asking for developer contribution, with requirements based on pre-identified settlement specifics. It is considered that these requirements could relate to habitat improvements.	-	P	+	+	+	

### **Summary and Conclusions:**

Around 50% of the National Park is protected by some form of Natura designation. The identified effects are therefore considered to be international in scale.

The National Park is protected by a range of national and international designation and is therefore highly sensitive to land use and land management changes. Negative effects have not been identified however a high degree of uncertainty has. This largely because it the size and location of sites within settlements that is likely to have the greatest effect and the options do not deal with these specifically.

This is not to say the potential for negative effects are not recognised. Settlements in Badenoch and Strathspey, for example, are located near areas protected by Natura sites, for example Anagach Woods near Grantown-on-Spey and Glenmore and Rothiemurchus forests near An Camas Mòr. In these areas, disturbance of species such as capercaillie is possible through increased recreational activities. Mitigation identified through the Habitats Regulations Appraisal, including the implementation of the Capercaillie Framework, as well as the policies of the NPPP and therefore it is considered that negative effects, significant or minor, are unlikely.



One significant negative effect has been identified against Policy 1.11. This is however a site based issue and one that is limited in scale. The mitigation outlined above will also encompass this. It is not considered to have any bearing on the overall sustainability of the Plan. It is also important to note that the development of these sites in question is unlikely within the Plan period and therefore it is probable that no negative effects occur at all.

In most areas the effects of the Plan are considered to be positive, with the Vision's promotion of landscape scale habitat management, and in particular woodland expansion, offering significantly positive effects.

# **SEA** Issue / Topic

Biodiversity, Fauna and Flora

# **SEA** Objective(s):

6b Maintain and improve the sustainable management of woodland for multiple benefits

# **SEA Sub-Objectives**

- Maintain or improve the capacity of woodland to sequester and store carbon.
- Enhance the ecological functioning of woodland at a landscape scale.
- Avoid the loss of ancient woodland and veteran trees.
- > Protect and enhance the environmental services woodland provide (e.g. flood alleviation and pollution mitigation).
- Protect and promote the recreational, cultural, landscape and economic value of woodland.

# **Significant Interrelationships**

Climatic factors, air, water, soil, material assents, landscape and cultural heritage, population and human health.

# Assessor(s):

Dan Harris

### **Date of Assessment:**

13/09/2017, 14/09/2017, 15/09/2017, 19/09/2017, 21/11/2018 and 22/11/2018.

Plan Element	Nature of Effect	Scale	Permanence	Sign Short Term	nifical Medium	Long Term	Mitigation and Enhancement
Vision							
Vision: An Outstanding National Park, enjoyed by everyone, where nature and people thrive together	The vision's objective to ensure that nature thrives within the National Park positively contributes to all aspects of the SEA objective.	ı	P	++	++	++	
Spatial Strategy							
Spatial Strategy	There are no predicted effects associated with the strategy.	Ī	Р				
Policies							
Policy I: New Housing Development							

	P Si		Sig	nifica	nce		
Plan Element		Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement	
1.1 Housing delivery in settlements	The effects of the policy depend on the location of the housing proposed. The effects are therefore uncertain.	1	P	?	?	?	Ecological appraisals, which included an assessment of the condition of woodlands and trees that may be affected by development, have been carried out and have been used to inform the choice of allocations and the mitigation that may be applied to limit any negative effects they may have on biodiversity. These have been included within the Settlement Information Section of the Proposed Plan and their requirements will need to be met to gain planning permission. Where necessary, the requirement for further surveys has been identified. Policy 4 also seeks to reduce any negative effects on biodiversity, while Policy 5 also has some positive synergistic effects on the SEA Objective.
I.2 Housing development in existing rural groups	The effects of the policy depend on the location of the housing proposed. The effects are therefore uncertain.	١.	P	?	?	?	See Mitigation for Policy 1.1.
1.3 Other housing in the countryside	The effects of the policy depend on the location of the housing proposed. The effects	ı	P	?	?	?	See Mitigation for Policy 1.1.

			Per	Sig	gnifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
	are therefore uncertain.						
I.4 Designing for affordability	There are no predicted effects associated with this policy.	1	Р				
1.5 Affordable housing	There are no predicted effects associated with this policy.	1	Р				
I.6 Affordable housing exception sites	The effects of the policy depend on the location and scale of the housing proposed. The effects are therefore uncertain.	ı	P	?	?	?	See Mitigation for Policy 1.1.
I.7 Alterations to existing houses	There are no predicted effects associated with this policy.		Р				
1.8 Conversions	There are no predicted effects associated with this policy.	I	P				
I.9 Replacement houses	There are no predicted effects associated with this policy.	ı	Р				
1.10 Housing for gypsies and travellers	There are no predicted effects associated with this policy.	I	Р				
1.11 Long term designations	Mature trees exist on the sites, however theoretically these could be retained as part of a development. The overall effects are therefore uncertain as it depends on the nature of the development proposed.	I	Р	?	?	?	See Mitigation for Policy 1.1. It is however important to note that the development of these sites is unlikely within the Plan period.
Policy 2: Supporting Economic Growth							
2.1 Retail development and high footfall	There are no predicted effects associated with this policy.	ı	Р				

			Per	Sig	nificar	nce	
Plan Element	nence	Short Term	Medium Term	Long Term	Mitigation and Enhancement		
generating uses							
2.2 Tourist accommodation	The effects of the policy depend on the location of the proposed development. The effects are therefore uncertain.	I	P	?	?	?	See Mitigation for Policy 1.1.
2.3 Other tourism and leisure developments	The effects of the policy depend on the location of the proposed development. The effects are therefore uncertain.	1	P	?	?	?	See Mitigation for Policy 1.1.
2.4 Other economic development	The effects of the policy depend on the location of the proposed development. The effects are therefore uncertain.	ı	Р	?	?	?	See Mitigation for Policy 1.1.
2.5 Protecting existing economic activity	The effects of the policy depend on the location of the proposed development. The effects are therefore uncertain.	1	P	?	?	?	See Mitigation for Policy 1.1.
Policy 3: Design and I	Placemaking						
3.1 Placemaking	There are no predicted effects associated with this policy	T	P				
3.2 Major Developments	Masterplanning major developments, which may cross ownership boundaries, can be used to ensure that sensitive areas are protected and mitigation and compensatory measures are delivered in the most beneficial way.	ı	Р	+	+	+	
3.3 Sustainable Design	There are no predicted effects associated with this policy	I	P				
3.4 Replacing existing	There are no predicted effects associated with	Ī	P				

			Per	Sig	nifica	nce	
Plan Element	0	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement	
building stock	this policy.						
3.5 Converting existing building stock	There are no predicted effects associated with this policy.	1	P				
3.6 Alterations to existing building stock	There are no predicted effects associated with this policy.	1	P				
Policy 4: Natural Her	itage						
4.1 International designations	The Policy will help protect the integrity and qualifying features of woodland protected sites.	ı	P	+	+	+	
4.2 National designations	The Policy will help protect the integrity and qualifying features of woodland protected sites.	1	Р	+	+	+	
4.3 Woodlands	The policy directly supports the aims of this SEA Objective.	1	Р	++	++	++	
4.4 Protected species	Protecting woodland species will help support the ecological functioning of woodlands.	ı	Р	+	+	+	
4.5 Other biodiversity	The policy is likely to support the aims of this SEA Objective through the protection and enhancement of woodland habitats.	ı	Р	+	+	+	
4.6 All development	The policy is likely to support the aims of this SEA Objective through the protection and enhancement of woodland habitats.	ı	Р	+	+	+	
Policy 5: Landscape							
5.1 Special Landscape Qualities	The option may have synergistic positive effects, through the creation new areas of trees and woodlands associated with landscaping	ı	Р	+	+	+	

			Per	Sig	nificai	nce				
Plan Element	Nature of Effect	Scale	Permanence Scale	Short Term	Medium Term	Long Term	Mitigation and Enhancement			
	plans.									
5.2 Private Roads and Ways	Forestry tracks are the subject of different legislation and guidance. Therefore, there are no predicted effects associated with option.	I	Р							
Policy 6: The Siting a	nd Design of Digital Communications Equip	ment	•							
Policy 6: The Siting and Design of Digital Communications Equipment	There are no predicted effects associated with this policy.	_	P							
Policy 7: Renewable I	nergy									
7.1 All renewable energy developments	There are no predicted effects associated with this policy.	ı	Р							
7.2 Hydropower	There are no predicted effects associated with this policy.	1	P							
7.3 Wind energy	There are no predicted effects associated with this policy.	I	P							
7.4 Biomass	There are no predicted effects associated with this policy.	ı	P							
7.5 Energy from waste	There are no predicted effects associated with this policy.	I	P							
7.6 Heat networks	There are no predicted effects associated with this policy.	I	P							
Policy 8: Open Space	Policy 8: Open Space, Sport and Recreation									

			Per	Sig	nificar	nce	
Plan Element	Nature of Effect	Scale	Permanence Scale	Short Term	Medium Term	Long Term	Mitigation and Enhancement
8.1 New development	There are no predicted effects associated with this policy.	1	Р				
8.2 Re-development of outdoor sports facilities	There are no predicted effects associated with this policy.	I	P		_		
8.3 Re-development of other open space	There are no predicted effects associated with this policy.	ı	P				
Policy 9: Cultural He	ritage						
9.1 Listed buildings	There are no predicted effects associated with this policy.	1	Р				
9.2 Cultural and historic designations	There are no predicted effects associated with this policy.	1	Р				
9.3 Conservation areas	There are no predicted effects associated with this policy.	ı	Р				
9.4 Other cultural heritage	There are no predicted effects associated with this policy.	T	P				
Policy 10: Resources							
10.1 Water resources	There are no predicted effects associated with this policy.	ı	Р				
10.2 Flooding	There are no predicted effects associated with this policy.	ı	P				
10.3 Connection to sewerage	There are no predicted effects associated with this policy.	I	P				
10.4 Waste	There are no predicted effects associated with	I	P				

			Per	Sig	nificar	nce	
Plan Element	nence	Short Term	Medium Term	Long Term	Mitigation and Enhancement		
management and	this policy.						
minimisation	T						
10.5 Landfill	There are no predicted effects associated with this policy.	ı	P				
10.6 Minerals	The policy has a presumption against the development of new mineral sites, though it does allow for amendments to and extensions of existing sites. It also requires the remediation of land after sites are closed, which providesopportunities for woodland creation and enhancement. The effects of this are uncertain as they are very much dependant on the scale location and nature, of any one development, and the standard of restoration.		P	?	?	?	See Mitigation for Policy 1.1.
10.7 Carbon sinks and stores	There are no predicted effects associated with this policy.	1	P				
10.8 Contaminated land	There are no predicted effects associated with this policy.	ı	P				
Policy II: Developer	Obligations	•					
Policy 11: Developer Obligations	The option offers a more effective procedural approach to asking for developer contribution, with requirements based on pre-identified settlement specifics. It is considered that these requirements could relate to habitat	I	Р	+	+	+	

			Per	Sig	nifica	nce	
Plan Element	Nature of Effect	Scale	manence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
	improvements, such as woodland expansion.						

# **Summary and Conclusions:**

The National Park is home to large areas of woodland, much of which is identified as being semi-natural and / or ancient. This woodland act as important habitats and support a wealth of species. Consequently, many are protected by Natura designations. The identified effects are therefore considered to be international in scale.

Where predicted effects are identified, they are all positive, with interventions within the Polices 4 and 5 offering a means of avoiding negative effects and even supporting for the expansion and enhancement the National Park's trees woodlands.

# Preferred options at glance:

# **SEA** Issue / Topic

Landscape and Cultural Heritage

# **SEA** Objective(s):

7 Protect and enhance the character, diversity and special qualities of the National Park's landscape and cultural and historic heritage

### **SEA Sub-Objectives**

- > Protect and enhance the National Park's special landscape qualities.
- Work towards creating landscapes that are ecologically functional.
- Minimise the loss of wildness.
- Reduce light pollution.
- > Value, protect and enhance the historic and cultural environment and its assets.
- > To promote high quality design based on a comprehensive understanding of landscape character and distinctiveness.
- > Protect and enhance townscape and respect the existing pattern, form and setting of settlements.

# **Significant Interrelationships**

Climatic factors, material assents, biodiversity, fauna and flora, population and human health.

# Assessor(s):

Dan Harris

### **Date of Assessment:**

13/09/2017, 14/09/2017, 15/09/2017, 19/09/2017, 21/11/2018 and 22/11/2018.

			Peri	Sig	nificai	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
Vision							
Vision: An Outstanding National Park, enjoyed by everyone, where nature and people thrive together	The vision's objective to ensure that nature and people thrive together, encompassing both the natural and social aspects of landscape and cultural heritage, positively contributes to meeting all aspects of the SEA objective.	N	P	++	++	++	
Spatial Strategy							
Spatial Strategy	Focusing development in the strategic settlements concentrates the landscape impact of significant development in a small number of locations that are able to accommodate the scale proposed. Negative impacts can therefore be avoided at locations less able to accommodate development within the landscape.	N	P	+	+	+	
Policies							
Policy I: New Housin	g Development						
I.I Housing delivery in settlements	Focusing development in the strategic and Intermediate settlements concentrates the landscape impact of significant development in a small number of locations that are able to accommodate the scale proposed. Negative impacts can therefore be avoided at locations	N	Р	+	+	+	

			Per	Sig	gnifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
	less able to accommodate development within the landscape.						
1.2 Housing development in existing rural groups	The effects of the policy depend on the location of the housing proposed. The effects are therefore uncertain.	N	P	?	?	?	Landscape appraisals have been carried out and have been used to inform the choice of allocations and the mitigation that may be applied to limit any negative effects they may have on the special qualities of the National Park. Although the effects of this policy are uncertain, Policies 4 and 5 will help mitigate against any of the possible negative effects facing the National Park's landscape.
1.3 Other housing in the countryside	The effects of the policy depend on the location of the housing proposed. The effects are therefore uncertain.	N	Р	?	?	?	See Mitigation for Policy 1.2.
I.4 Designing for affordability	There are no predicted effects associated with this policy.	N	P				
1.5 Affordable housing	There are no predicted effects associated with this policy.	N	Р				
I.6 Affordable housing exception sites	The effects of the policy depend on the location and scale of the housing proposed. The effects are therefore uncertain.	N	Р	?	?	?	See Mitigation for Policy 1.2.
1.7 Alterations to existing houses	There are no predicted effects associated with this policy.	N	Р				

			Per	Sig	gnificar	nce	
Plan Element	Nature of Effect	Scale	nce	Short Term	Medium Term	Long Term	Mitigation and Enhancement
1.8 Conversions	There are no predicted effects associated with this policy.	N	Р				
I.9 Replacement houses	There are no predicted effects associated with this policy.	N	P				
1.10 Housing for gypsies and travellers	There are no predicted effects associated with this policy.	Z	P				
I.II Long term designations	The sites consist of pasture fields that articulate around stands of mature trees on glacio-fluvial knolls. Great views across this area to Cairngorm Massif from B9152. Provides high quality setting to Aviemore.	N	P	-	-		Landscape appraisals have been carried out and have been used to inform the choice of allocations and the mitigation that may be applied to limit any negative effects they may have on the special qualities of the National Park. Although the effects of this policy are uncertain, Policies 4 and 5 will help mitigate against any of the possible negative effects facing the National Park's landscape. In the case of sites LTH1 and LTH 2, the effects could be limited by the retention and enhancement of the sites' e wooded knolls and the retention and creation of open views to the Cairngorms. It is important to note that the development of these sites is

			Per	Sig	nificai	nce	
Plan Element	Nature of Effect	Scale	Permanence Scale	Short Term	Medium Term	Long Term	Mitigation and Enhancement
							unlikely within the Plan period.
Policy 2: Supporting	Economic Growth						
2.1 Retail development and high footfall generating uses	There are no predicted effects associated with this policy.	N	Р				
2.2 Tourist accommodation	The effects of the policy depend on the location and scale of the housing proposed.  The effects are therefore uncertain.	N	P	?	?	?	See Mitigation for Policy 1.2.
2.3 Other tourism and leisure developments	The effects of the policy depend on the location and scale of the housing proposed. The effects are therefore uncertain.	N	P	?	?	?	See Mitigation for Policy 1.2.
2.4 Other economic development	The effects of the policy depend on the location and scale of the housing proposed.  The effects are therefore uncertain.	N	Р	?	?	?	See Mitigation for Policy 1.2.
2.5 Protecting existing economic activity	The effects of the policy depend on the location and scale of the housing proposed. The effects are therefore uncertain.	N	P				See Mitigation for Policy 1.2.
Policy 3: Design and I	Placemaking						
3.1 Placemaking	The policy contributes towards promoting high quality design based on a comprehensive understanding of landscape character and distinctiveness, protecting and enhancing townscapes and respecting the existing pattern, form and setting of settlements.	N	Р	++	++	++	

			Peri	Sig	nificai	nce	
Plan Element	nence	Short Term	Medium Term	Long Term	Mitigation and Enhancement		
3.2 Major	Masterplanning major developments, which						
Developments	may cross ownership boundaries, can be used						
	to ensure that sensitive areas are protected	N	P	+	+	+	
	and landscaping schemes are delivered in the most effective way.						
3.3 Sustainable Design	The policy contributes towards promoting high						
	quality design based on a comprehensive						
	understanding of landscape character and	N	Р	++	++	++	
	distinctiveness, protecting and enhancing		-				
	townscapes and respecting the existing pattern, form and setting of settlements.						
3.4 Replacing existing	There are no predicted effects associated with	N	Р				
building stock	this policy.		_				
3.5 Converting existing building stock	There are no predicted effects associated with this policy.	N	P				
3.6 Alterations to	There are no predicted effects associated with	N	Р				
existing building stock	this policy.	N	Г				
Policy 4: Natural Her	itage						
4.1 International	There are no predicted effects associated with	N	Р				
designations	this policy.	13	Г				
4.2 National	There are no predicted effects associated with	N	Р				
designations	this policy.		F				
4.3 Woodlands	By protecting and enhancing trees and woodlands, the policy is likely to have positive	N	P	+	+	+	

			Per	Sig	gnifica	nce	
Plan Element	Plan Element Nature of Effect Scale Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement		
	effects on landscape quality.						
4.4 Protected species	There are no predicted effects associated with this policy.	N	Р				
4.5 Other biodiversity	By protecting and enhancing biodiversity, the policy is likely to have positive effects on landscape quality.	N	Р	+	+	+	
4.6 All development	By protecting and enhancing biodiversity, the policy is likely to have positive effects on landscape quality.	N	Р	+	+	+	
Policy 5: Landscape							
5.1 Special Landscape Qualities	The policy actively supports the aims of the SEA Objective.	N	Р	++	++	++	
5.2 Private Roads and Ways	The presumption against hill track development is likely to have a positive effect on landscape quality.	N	Р	+	+	+	
Policy 6: The Siting a	nd Design of Digital Communications Equip	men	t				
Policy 6: The Siting and Design of Digital Communications Equipment	The installation of new masts or antennas could have a negative effect on landscape value. The magnitude of the effect is however dependant on the scale and nature of the proposal	N	Р	?	?	?	See Mitigation for Policy 1.2.
Policy 7: Renewable Energy							
7.1 All renewable	The installation of new renewable	N	Р	?	?	?	See Mitigation for Policy 1.2.

			Per	Significa	Significance		
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
energy developments	infrastructure could have a negative effect on landscape value. The magnitude of the effect is however dependant on the scale and nature of the proposal						
7.2 Hydropower	The policy outlines additional requirements for the development of Hydropower permitted under policy 7.1. There are therefore no predicted negative or positive effects associated with this policy.	z	P				
7.3 Wind energy	The policy outlines additional requirements for the development of wind energy permitted under policy 7.1. There are therefore no predicted negative or positive effects associated with this policy.	N	P	_			
7.4 Biomass	The policy outlines additional requirements for the development of biomass facilities permitted under policy 7.1. There are therefore no predicted negative or positive effects associated with this policy.	N	Р	_			
7.5 Energy from waste	The policy outlines additional requirements for the development of energy from waste facilities permitted under policy 7.1. There are therefore no predicted negative or positive effects associated with this policy.	N	P				
7.6 Heat networks	The policy outlines additional requirements for	N	P				

			Per	Significan	Significance		
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
	the development of heat networks permitted under policy 7.1. There are therefore no predicted negative or positive effects associated with this policy.						
Policy 8: Open Space	, Sport and Recreation						
8.1 New development	There are no predicted effects associated with this policy.	N	P				
8.2 Re-development of outdoor sports facilities	There are no predicted effects associated with this policy.	Z	Р		_		
8.3 Re-development of other open space	There are no predicted effects associated with this policy	N	P				
Policy 9: Cultural He	ritage						
9.1 Listed buildings	The Policy aims to protect and enhance the historic and cultural environment thereby supporting the aims of the SEA Objective.	N	Р	++	++	++	
9.2 Cultural and historic designations	The Policy aims to protect and enhance the historic and cultural environment thereby supporting the aims of the SEA Objective.	N	P	++	++	++	
9.3 Conservation areas	The Policy aims to protect and enhance the historic and cultural environment thereby supporting the aims of the SEA Objective.	N	P	++	++	++	
9.4 Other cultural heritage	The Policy aims to protect and enhance the historic and cultural environment thereby	N	P	++	++	++	

Plan Element			Per	Significance		nce	
	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
	supporting the aims of the SEA Objective.						
Policy 10: Resources							
10.1 Water resources	There are no predicted effects associated with this policy.	N	Р				
10.2 Flooding	There are no predicted effects associated with this policy.	N	Р				
10.3 Connection to sewerage	There are no predicted effects associated with this policy.	N	P				
10.4 Waste management and minimisation	There are no predicted effects associated with this policy.	N	P	_			
10.5 Landfill	There are no predicted effects associated with this policy.	N	Р				
10.6 Minerals	Well designed and thought-out restoration should benefit the landscape. However, the effects of this are uncertain as they are very much dependant on the scale location and nature, of any one development, and the standard of restoration.	N	Р	?	?	?	See Mitigation for Policy 1.2.
10.7 Carbon sinks and stores	Protecting carbon rick soils could have some minor landscape benefits.	N	Р	+	+	+	
10.8 Contaminated land	There are no predicted effects associated with this policy.	N	Р				
Policy II: Developer Obligations							

			Per	Sig	Significance	nce	
Plan Element	Nature of Effect	Scale	manence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
Policy 11: Developer Obligations	The option offers a more effective procedural approach to asking for developer contribution, with requirements based on pre-identified settlement specifics. It is considered that these requirements could result in landscape enhancement.	Z	P	+	+	+	

### **Summary and Conclusions:**

The Cairngorms National Park is the UK's largest protected landscape and has a character that is well recognised for its special qualities. Any potential effects on landscape quality or the cultural and historic environment are therefore considered to be national in scale.

Uncertainty identified against a large number of options as it is likely that effects will be dependent on the nature, design and location of development.

The only negative effect is identified against Policy I.II. This is however a site based issue and an extremely minor one at that. It is not considered to have any bearing on the overall sustainability of the Plan. It is also important to note that the development of these sites in question is unlikely within the Plan period and therefore it is probable that no negative effects occur at all.

Assessments a	glance:

# **SEA** Issue / Topic

Population and Human Health

# **SEA** Objective(s):

8a Promote opportunities that maximise the health and wellbeing of local people, visitors and communities.

# **SEA Sub Objective**

- Maintain the recreational value of the Cairngorms National Park.
- Promote and maintain opportunities for people to enjoy physical recreation and lead healthy lifestyles.
- Encourage walking or cycling as an alternative means of transportation.
- Empower people to experience, learn about and share the Cairngorms National Park's historic, cultural and natural heritage.
- Promote the improvement and maintenance of social and physical environments / facilities that provide opportunities to enhance health and wellbeing.

# **Significant Interrelationships**

Landscape and cultural heritage, population and human health.

### Assessor(s):

Dan Harris

### **Date of Assessment:**

13/09/2017, 14/09/2017, 15/09/2017, 19/09/2017, 21/11/2018 and 22/11/2018.

	Nature of Effect		Permanence	Significance			
Plan Element		Scale		Short Term	Medium Term	Long Term	Mitigation and Enhancement
Vision							
Vision: An Outstanding National Park, enjoyed by everyone, where nature and people thrive together	The vision explicitly supports the enjoyment of the National Park and therefore actively promotes opportunities that maximise the health and wellbeing of local people, visitors and communities.	R	P	++	++	++	
Spatial Strategy							
Spatial Strategy	The co-location of housing and economic growth development in the strategic settlements as identified in the will help reduce the reliance on private motor vehicles and encourage walking and cycling.	R	P	+	+	+	
Policies							
Policy I: New Housin	g Development						
1.1 Housing delivery in settlements	The co-location of housing and economic growth development in the strategic settlements as identified in the will help reduce the reliance on private motor vehicles and encourage walking and cycling.	R	P	+	+	+	
I.2 Housing development in existing rural groups	The provision of housing in locations where it is needed at a scale where it does not adversely affect the amenity of the locality is likely to have some minor positive effects on health and	R	P	+	+	+	

Plan Element			Per	P Si	gnifica	nce	
	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
	wellbeing.						
1.3 Other housing in the countryside	The provision of housing in locations where it is needed at a scale where it does not adversely affect the amenity of the locality is likely to have some minor positive effects on health and wellbeing.	R	P	+	+	+	
1.4 Designing for affordability	Good health and wellbeing is linked to the availability of good quality and affordable housing. Ensuring that housing is targeted at those who are most in need will have significant positive benefits against the SEA objective.	R	P	++	++	++	
1.5 Affordable housing	Good health and wellbeing is linked to the availability of good quality and affordable housing. Aiming for a higher level of affordable housing provision in areas that are under particular pressure, namely Aviemore, Ballater, Braemar and Blair Atholl, will therefore have significant positive benefits against the SEA objective.	R	P	++	++	++	

			Per	Sig	nificar	nce	
Plan Element	0	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement	
I.6 Affordable housing exception sites	Good health and wellbeing is linked to the availability of good quality and affordable housing. The scale of the policy is however likely to be limited and therefore it is considered that the policy will have some minor positive benefits against the SEA objective.	R	P	+	+	+	
I.7 Alterations to existing houses	There are no predicted effects associated with this policy.	R	P				
1.8 Conversions	There are no predicted effects associated with this policy.	R	P				
1.9 Replacement houses	There are no predicted effects associated with this policy.	R	P				
1.10 Housing for gypsies and travellers	There are no predicted effects associated with this policy.	R	Р				
I.II Long term designations	Two sites have been identified in Aviemore, which is home to the greatest concentration of services within the National Park. However, the sites are currently within moderate walking distance of public transport, local facilities and housing. However, their scale allows for the creation of local shops and their integration with the public transport network.	R	P	-	-	-	Policies 3, 7 and 11 have a wide range of elements that will help mitigate the negative effects of this policy on the SEA Objective, Policy 11 allows the LPA to ask for developer obligations to deliver improvements to walking and cycling infrastructure and the public transport network.

			Per	Sig	nificar	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
Policy 2: Supporting	Economic Growth						
2.1 Retail development and high footfall generating uses	There are no predicted effects associated with this policy.	R	P				
2.2 Tourist accommodation	There are no predicted effects associated with this policy.	R	P				
2.3 Other tourism and leisure developments	There are no predicted effects associated with this policy.	R	P				
2.4 Other economic development	There are no predicted effects associated with this policy.	R	P				
2.5 Protecting existing economic activity	There are no predicted effects associated with this policy.	R	Р				
Policy 3: Design and I	Placemaking						
3.1 Placemaking	The policy aims to enable new development that contributes positively to a sense of place and to retain and enhance local character, to create spaces that are legible, inclusive and pleasurable to be in and also promote active travel thus indirectly and directly promoting opportunities that maximise the health and wellbeing of local people, visitors and communities alike.	R	Р	++	++	++	
3.2 Major Developments	Masterplanning major developments, which may cross ownership boundaries, can be used	R	Р	++	++	++	

			Per	Sig	nificar	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
	to ensure that new sport and recreation facilities are delivered in conjunction with other uses, thereby having a positive effect on health and wellbeing.						
3.3 Sustainable Design	The policy aims to enable new development that contributes positively to a sense of place and to retain and enhance local character, to create spaces that are legible, inclusive and pleasurable to be in and also promote active travel thus indirectly and directly promoting opportunities that maximise the health and wellbeing of local people, visitors and communities alike.	R	P	++	++	++	
3.4 Replacing existing building stock	There are no predicted effects associated with this policy.	N	P				
3.5 Converting existing building stock	There are no predicted effects associated with this policy.	N	P				
3.6 Alterations to existing building stock	There are no predicted effects associated with this policy.	R	P				
Policy 4: Natural Her							
4.1 International designations	There are no predicted effects associated with this policy.	R	P				
4.2 National designations	There are no predicted effects associated with this policy.	R	P				

			Per	Sig	nifica	nce		
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement	
4.3 Woodlands	The policy will help promote the improvement and maintenance of social and physical environments that provide opportunities to enhance health and wellbeing.	R	Р	+	+	+		
4.4 Protected species	There are no predicted effects associated with this policy.	R	P					
4.5 Other biodiversity	The policy will help promote the improvement and maintenance of social and physical environments that provide opportunities to enhance health and wellbeing.	R	P	+	+	+		
4.6 All development	The policy will help promote the improvement and maintenance of social and physical environments that provide opportunities to enhance health and wellbeing.	R	Р	+	+	+		
Policy 5: Landscape								
5.1 Special Landscape Qualities	By requiring development to take landscape quality into account, the policy contributes to the empowerment of people to experience, learn about and share the National Park's landscape.	R	Р	+	+	+		
5.2 Private Roads and Ways	There are no predicted effects associated with this policy.	R	Р					
Policy 6: The Siting and Design of Digital Communications Equipment								
Policy 6: The Siting and	There are no predicted effects associated with	R	Р					

			Per	Sig	nifica	nce	
Plan Element		Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement	
Design of Digital	this policy.						
Communications							
Equipment							
Policy 7: Renewable I	Energy						
7.1 All renewable energy developments	There are no predicted effects associated with this policy.	R	Р				
7.2 Hydropower	There are no predicted effects associated with this policy.	R	P				
7.3 Wind energy	There are no predicted effects associated with this policy.	R	P				
7.4 Biomass	There are no predicted effects associated with this policy.	R	P				
7.5 Energy from waste	There are no predicted effects associated with this policy.	R	P				
7.6 Heat networks	There are no predicted effects associated with this policy.	R	P				
Policy 8: Open Space	, Sport and Recreation						
8.1 New development	Developing new sport and recreation facilities could have a positive effect on health and wellbeing.	R	Р	++	++	++	
8.2 Re-development of outdoor sports facilities	Re-developing and enhancing sport and recreation facilities could have a positive effect on health and wellbeing.	R	Р	++	++	++	
8.3 Re-development of	9	R	Р	++	++	++	

			Per	Sig	nifica	nce	
Plan Element	0	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement	
other open space	spaces and recreational facilities, which provideopportunities for leading active and healthy lifestyles.						
Policy 9: Cultural He	ritage						
9.1 Listed buildings	The policy supports the SEA Objectives aim of empowering people to experience, learn and share the National Park's historic and cultural environment.	R	P	++	++	++	
9.2 Cultural and historic designations	The policy supports the SEA Objectives aim of empowering people to experience, learn and share the National Park's historic and cultural environment.	R	P	++	++	++	
9.3 Conservation areas	The policy supports the SEA Objectives aim of empowering people to experience, learn and share the National Park's historic and cultural environment.	R	Р	++	++	++	
9.4 Other cultural heritage	The policy supports the SEA Objectives aim of empowering people to experience, learn and share the National Park's historic and cultural environment.	R	Р	++	++	++	
Policy 10: Resources							
10.1 Water resources	There are no predicted effects associated with this policy.	R	P				
10.2 Flooding	There are no predicted effects associated with	R	Р				

			Per	Sig	nificar	nce	
Plan Element	Plan Element Nature of Effect Scale Plan Element	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement	
	this policy.						
10.3 Connection to sewerage	There are no predicted effects associated with this policy.	R	P				
10.4 Waste management and minimisation	There are no predicted effects associated with this policy.	R	P	_			
10.5 Landfill	There are no predicted effects associated with this policy.	R	P				
10.6 Minerals	There are no predicted effects associated with this policy.	R	Р				
10.7 Carbon sinks and stores	There are no predicted effects associated with this policy.	R	P				
10.8 Contaminated land	There are no predicted effects associated with this policy.	R	P				
Policy II: Developer	Obligations						
Policy 11: Developer Obligations	The option offers a more effective procedural approach to asking for developer contribution, with requirements based on pre-identified settlement specifics. These requirements could relate to a range of recreation infrastructure and public services facilities that would contribute positively to the SEA Objective.	R	Р	++	++	++	

### **Summary and Conclusions:**

Overall, the Policies of the LDP offer strong recreational benefits, increasing opportunities physical recreation and enhancing health and wellbeing. Combined, these effects are likely to be significant, particularly when considering the population and housing growth projected and permitted in the local area.

The only negative effect is identified against Policy I.II. This is however a site based issue and an extremely minor one at that. It is not considered to have any bearing on the overall sustainability of the Plan. It is also important to note that the development of these sites in question is unlikely within the Plan period and therefore it is probable that no negative effects occur at all.

# Preferred options at glance:

# **SEA** Issue / Topic

Population and Human Health

### **SEA** Objective(s):

8b Support vibrant, safe and healthy communities.

### **SEA Sub-Objectives**

- Ensure the population and household growth is accommodated in appropriate locations.
- Ensure a suitable affordable housing stock is available to meet needs.
- > Promote the design of settlements that improve social fabric by removing barriers and creating opportunities for positive interactions.
- > Promote the inclusion of disadvantaged and minority groups.
- > Redress imbalances of inequality, deprivation and exclusion.
- > Provide easy access to high quality facilities and services.
- Ensure that adequate healthcare premises are provided throughout the National Park.
- > Reduce burden of ill-health in the population.
- Reduce the causes of accidents.
- Ensure the quality of the built environment complements the high quality natural environment.

## **Significant Interrelationships**

Climatic factors, air, water, soil, material assents, biodiversity, fauna and flora, landscape and cultural heritage, population and human health.

### Assessor(s):

Dan Harris

### **Date of Assessment:**

13/09/2017, 14/09/2017, 15/09/2017, 19/09/2017, 21/11/2018 and 22/11/2018.

Plan Element			Per	Sig	gnifica	nce	
	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
Vision							
Vision: An Outstanding National Park, enjoyed by everyone, where nature and people thrive together	The vision's explicit objectives to support the enjoyment of the National Park by everyone, where nature and people thrive together actively contributes towards supporting vibrant, safe and healthy communities.	R	P	++	++	++	
Spatial Strategy							
Spatial Strategy	The Strategy's aim to meet the majority housing need in in the strategic settlements but also to ensure that there is a flexible land supply in the smaller settlements should help deliver the SEA objective's aims to ensure the population and household growth is accommodated in appropriate locations and to ensure a suitable affordable housing stock is available to meet needs, thus supporting vibrant, safe and healthy communities. The concentration of growth in these locations will also help provide easy access to the National Park's main facilities and services.	R	P	++	++	++	
Policies							
Policy I: New Housin	g Development						

			Per	Sig	nificar	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
I.I Housing delivery in	The Strategy's aim to meet the majority						
settlements	housing need in in the strategic settlements but also to ensure that there is a flexible land						
	supply in the smaller settlements should help						
	deliver the SEA objective's aims to ensure the						
	population and household growth is						
	accommodated in appropriate locations and to	R	P	++	++	++	
	ensure a suitable affordable housing stock is						
	available to meet needs, thus supporting vibrant, safe and healthy communities. The						
	concentration of growth in these locations will						
	also help provide easy access to the National						
	Park's main facilities and services.						
1.2 Housing	There are no predicted effects associated with		_	_			
development in	this policy.	R	Р				
existing rural groups  1.3 Other housing in	There are no predicted effects associated with						
the countryside	this policy.	R	P				
1.4 Designing for	Good health and wellbeing is linked to the						
affordability	availability of good quality and affordable						
	housing. Ensuring that housing is targeted at those who are most in need will help address	R	Р	++	++	++	
	inequality and ensure that communities remain	"	Г				
	vibrant and healthy and have significant positive						
	benefits against the SEA objective.						

			Per	Sig	nificar	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
1.5 Affordable housing	Aiming for a higher level of affordable housing provision in areas that are under particular pressure, namely Aviemore, Ballater, Braemar and Blair Atholl, will have significant positive benefits against the SEA objective.	R	Р	++	++	++	
I.6 Affordable housing exception sites	Good health and wellbeing is linked to the availability of good quality and affordable housing. The scale of the policy is however likely to be limited and therefore it is considered that the policy will have some minor positive benefits against the SEA objective.	R	P	+	+	+	
I.7 Alterations to existing houses	There are no predicted effects associated with this policy.	R	Р				
I.8 Conversions	There are no predicted effects associated with this policy.	R	P				
I.9 Replacement houses	There are no predicted effects associated with this policy.	R	P				
1.10 Housing for gypsies and travellers	The provision of designated sites and housing for gypsies and travellers where need is required will have a positive benefit on the health and wellbeing of those communities and promote overall social cohesion.	R	P	+	+	+	
I.II Long term designations	The sites are within moderate walkingdistance of public transport, localfacilities and housing	R	P	-	-	-	Policies 3, 7 and 11 have a wide range of elements that will help

			Per	Sig	gnifica	nce	
Plan Element	Plan Element Nature of Effect Scale Sanence	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement	
	which maynot encourage community interactions and cohesion.						mitigate the negative effects of this policy on the SEA Objective, Policy I I allows the LPA to ask for developer obligations to deliver improvements to walking and cycling infrastructure and the public transport network.
Policy 2: Supporting	Economic Growth						
2.1 Retail development and high footfall generating uses	The policy aims to meet the retail needs of both towns and smaller settlements, thereby helping to build vibrant, safe and cohesive communities and help redress past imbalances of inequality, deprivation and exclusion.	R	P	+	+	+	
2.2 Tourist accommodation	Supporting the year round economy will help support vibrant and healthy communities d help redress past imbalances of inequality, deprivation and exclusion.	R	Р	+	+	+	
2.3 Other tourism and leisure developments	Supporting the year round economy will help support vibrant and healthy communities d help redress past imbalances of inequality, deprivation and exclusion.	R	Р	+	+	+	
2.4 Other economic development	Supporting the vitality and viability of the local economy with help build vibrant, safe and cohesive communities and help redress past imbalances of inequality, deprivation and	R	Р	+	+	+	

			Per	Sig	nifica	nce	
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement
	exclusion.						
2.5 Protecting existing economic activity	Protecting existing economic activity will help support vitality and viability of the local economy with help build vibrant, safe and cohesive communities and help redress past imbalances of inequality, deprivation and exclusion.	R	P	+	+	+	
Policy 3: Design and	Placemaking						
3.1 Placemaking	The policy will help promote the design of settlements that improve social fabric by removing barriers and creating opportunities for positive interactions and ensure the quality of the built environment complements the high quality natural environment.	R	P	+	+	+	
3.2 Major Developments	Masterplanning major developments, which may cross ownership boundaries, can be used to ensure that the built environment compliments the high quality of the natural environment, provides access to high quality facilities and services and removes barriers to pubic interaction.	R	P	++	++	++	
3.3 Sustainable Design	The policy will help promote the design of settlements that improve social fabric by removing barriers and creating opportunities for positive interactions and ensure the quality	R	P	+	+	+	

Plan Element	Nature of Effect	Scale	Permanence	Sig	nifica	nce	Mitigation and Enhancement	
				Short Term	Medium Term	Long Term		
	of the built environment complements the high quality natural environment.							
3.4 Replacing existing building stock	There are no predicted effects associated with this policy	R	P					
3.5 Converting existing building stock	There are no predicted effects associated with this policy	R	Р					
3.6 Alterations to existing building stock	There are no predicted effects associated with this policy	R	P					
Policy 4: Natural Her	Policy 4: Natural Heritage							
4.1 International designations	There are no predicted effects associated with this policy	R	P					
4.2 National designations	There are no predicted effects associated with this policy	R	Р					
4.3 Woodlands	By protecting and enhancing woodlands and providing access to the natural environment, the policy creates opportunities for leading active, healthy lifestyles, promotes wellbeing and empowers people to access and appreciate the National Park's natural heritage.	R	Р	+	+	+		
4.4 Protected species	There are no predicted effects associated with this policy	R	P					
4.5 Other biodiversity	By protecting and enhancing biodiversity and providing access to the natural environment, the policy creates opportunities for leading	R	P	+	+	+		

Plan Element	Nature of Effect	Scale	Permanence	Sig	nifica	nce	Mitigation and Enhancement
				Short Term	Medium Term	Long Term	
	active, healthy lifestyles, promotes wellbeing and empowers people to access and appreciate the National Park's natural heritage.						
4.6 All development	By protecting and enhancing biodiversity and providing access to the natural environment, the policy creates opportunities for leading active, healthy lifestyles, promotes wellbeing and empowers people to access and appreciate the National Park's natural heritage.	R	P	+	+	+	
Policy 5: Landscape							
5.1 Special Landscape Qualities	By requiring development to take landscape quality into account, the policy helps to ensure the quality of the built environment complements the high quality natural environment.	R	Р	+	+	+	
5.2 Private Roads and Ways	There are no predicted effects associated with this policy.	R	Р				
Policy 6: The Siting and Design of Digital Communications Equipment							
Policy 6: The Siting and Design of Digital Communications Equipment	The policy enables the provision of high quality services, namely broadband and mobile data.	R	Р	+	+	+	
Policy 7: Renewable Energy							

Plan Element	Nature of Effect		Permanence	Significance			
		Scale		Short Term	Medium Term	Long Term	Mitigation and Enhancement
7.1 All renewable energy developments	There are no predicted effects associated with this policy.	R	Р				
7.2 Hydropower	There are no predicted effects associated with this policy.	R	Р				
7.3 Wind energy	There are no predicted effects associated with this policy.	R	Р				
7.4 Biomass	There are no predicted effects associated with this policy.	R	P				
7.5 Energy from waste	There are no predicted effects associated with this policy.	R	Р				
7.6 Heat networks	There are no predicted effects associated with this policy.	R	P				
Policy 8: Open Space	, Sport and Recreation						
8.1 New development	Providing sport and recreation facilities will help sustain communities and directly support this SEA objective.	R	Р	++	++	++	
8.2 Re-development of outdoor sports facilities	Re-developing and enhancing sport and recreation facilities will help sustain communities and directly support this SEA objective.	R	Р	++	++	++	
8.3 Re-development of other open space	The policy seeks to prevent the loss of open spaces and recreational facilities, which provide opportunities for positive interactions and social cohesion.	R	Р	++	++	++	

	Nature of Effect	Scale	Permanence	Significance			
Plan Element				Short Term	Medium Term	Long Term	Mitigation and Enhancement
Policy 9: Cultural He	ritage						
9.1 Listed buildings	There are no predicted effects associated with this policy.	R	Р				
9.2 Cultural and historic designations	There are no predicted effects associated with this policy.	R	P				
9.3 Conservation areas	There are no predicted effects associated with this policy.	R	P				
9.4 Other cultural heritage	There are no predicted effects associated with this policy.	R	P				
Policy 10: Resources							
10.1 Water resources	There are no predicted effects associated with this policy.	R	P				
10.2 Flooding	There are no predicted effects associated with this policy.	R	P				
10.3 Connection to sewerage	There are no predicted effects associated with this policy.	R	P				
10.4 Waste management and minimisation	There are no predicted effects associated with this policy.	R	P				
10.5 Landfill	There are no predicted effects associated with this policy.	R	P				
10.6 Minerals	There are no predicted effects associated with this policy.	R	P				
10.7 Carbon sinks and	There are no predicted effects associated with	R	P				

			Per	Sig	nificar	nce		
Plan Element	Nature of Effect	Scale	Permanence	Short Term	Medium Term	Long Term	Mitigation and Enhancement	
stores	this policy.							
10.8 Contaminated land	There are no predicted effects associated with this policy.	R	P					
Policy II: Developer	Policy II: Developer Obligations							
Policy 11: Developer Obligations	The option offers a more effective procedural approach to asking for developer contribution, with requirements based on pre-identified settlement specifics, including the provision of healthcare facilities. These requirements could relate to a range of recreation infrastructure and public services facilities that would contribute positively to the SEA Objective.	R	P	++	++	++		

# **Summary and Conclusions:**

Overall, the Policies of the LDP offer strong benefits for increasing inclusion and positive social interactions. Combined, these effects are likely to be significant, particularly when considering the population and housing growth projected and permitted in the local area.

The only negative effect is identified against Policy I.II. This is however a site based issue and an extremely minor one at that. It is not considered to have any bearing on the overall sustainability of the Plan. It is also important to note that the development of these sites in question is unlikely within the Plan period and therefore it is probable that no negative effects occur at all.

# Preferred options at glance: