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Our Case ID: 201601795  
Your ref: 01109 - ENVIRONMENTAL  
REPORT  
28 September 2016

Dear Mr Harris

**Environmental Assessment (Scotland) Act 2005  
Cairngorms National Park Authority - The Cairngorms National Park Partnership  
Plan 2017 - 2022**

Thank you for your consultation which we received on 30 June about the above and its Environmental Report (ER). We have reviewed these documents in relation to our main area of interest for the historic environment. The first part of this response relates to the Big 9 consultation, with part two focusing upon its environmental assessment.

**Part 1: Cairngorms National Park Authority - The Cairngorms National Park Partnership Plan 2017 – 2022 – The Big 9**

We understand that the Big 9 consultation aims to identify the key issues and challenges for management of the National Park for the next five years, and that consequently it has focussed on those issues, rather than attempting to include all issues relevant to the Partnership Plan at this stage. We note that the consultation has not drawn out the historic environment as a key issue, and we are content with this approach in this context. However, as you move towards drafting the National Park Partnership Plan (NPPP), we encourage you to embed the historic environment (both in terms of its protection and the benefits it can offer) into the Plan.

*Conservation*

Aspirations for landscape scale conservation within the CNPPP should embody the Landscape Convention of Europe's holistic approach to the understanding and management of landscape as both a natural and cultural resource. We would encourage the CNPPP to take into consideration the potential for woodland expansion to have adverse effects through damage to monuments and sites, or erosion of historic landscape features.

We welcome the identification of flood management as a key issue, and hope that the CNPPP will provide scope for the identification of opportunities for the protection of vulnerable historic environment assets from flooding and flood damage.

### *Visitor Experience*

We welcome your aspirations for enhancing the quality of the Park as a tourism destination. The historic environment is a key element of the visitor experience which should be recognised by the CNPPP as it develops. There are five visitor sites operated by Historic Environment Scotland within the National Park. The focus within the emerging CNPPP on visitor experience will present a driver for us to ensure our interpretation panels are up to date, and to explore opportunities for outreach, learning and inclusion activities at our sites, building on what we already offer. We would also welcome exploration of opportunities for partnership working in this area.

### **Part 2: Environmental Report**

We are broadly content with the findings of the Environmental Report (ER). However, we noted that commentary on the assessment of the Landscape and Cultural Heritage topic focussed on landscape and was limited in its discussion of effects of cultural heritage, and historic environment in particular. It would have been helpful for the commentary to describe the assessment of effects for the historic environment. In the case of Policy 2.2, we would have expected the assessment to recognise the potential for negative effects on the historic environment from woodland expansion.

None of the comments contained in this letter constitute a legal interpretation of the requirements of the Environmental Assessment (Scotland) Act 2005. They are intended rather as helpful advice, as part of our commitment to capacity-building in SEA.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Virginia Sharp and they can be contacted by phone on 0131 668 0131 668 8704 or by email on [virginia.sharp@hes.scot](mailto:virginia.sharp@hes.scot).

Yours sincerely

Virginia Sharp  
**Historic Environment Scotland**