

Paper 2

Appendix 2

Representations

Badenoch & Strathspey Conservation Group
Fiodhag, Nethybridge, Inverness-shire PH25 3DJ
Tel [REDACTED]
Scottish Charity No. SC003846
Email [REDACTED]

Mary Grier

CNPA Planning Office

Ballater

20.7.12

Dear Mary Grier

Touring Caravan Site at Granish, Aviemore 2012/0188/DET (HC Ref 12/02019/FUL)

I am writing on behalf of BSCG to object to the above application and to indicate that BSCG wishes to speak at the CNPA planning committee meeting when this application is discussed.

BSCG's reasons for objecting include the following points which are presented in no particular order:

Outwith Settlement Boundary

The proposal site is outwith the settlement boundary of Aviemore in the current Local Plan and in the settlement maps as currently proposed for the forthcoming Local Development Plan.

Expansion of Aviemore

The proposal could provide a justification for the built up area of Aviemore to expand north towards the proposal site at Granish. Were the present proposal to be built this would make the 'logic' of such development considerably harder to resist. A linear 'ribbon' development style of development of Aviemore has for many years been viewed as inappropriate.

Incremental development of permanent structures

The development of permanent accommodation such as lodges would be hard to resist as a 'natural progression' of the business were the present proposals to be built. The CNPA has indeed repeatedly approved such a change from temporary to permanent developments in our district, for example at the Glenmore caravan and camping site, where wooden lodges were approved; and at Badaguish where wooden wigwams have been approved. One justification for these permanent structures has been all-weather and all-season usage. More extreme weather is predicted in Scotland which would strengthen the case for permanent structures (for example, four of the wettest months since records began in 1910 have occurred in the last four years, including the wettest April and June this year). Permanent holiday chalets accommodation can then lead to permanent dwellings.

Application for Site Manager's Dwelling

The development of a permanent dwelling on the site sets a damaging precedent. For example, it undermines the defensibility of the settlement boundary of Aviemore.

Designations

Part of the footprint of the access road and possibly part of the footprint of the caravan site itself are within the Ancient Woodland Inventory site.

High Invertebrate Interest

The proposal site is within the 'Strathspey' Important Area for Invertebrates in the Cairngorms (see p. 260-261 Rotheray and Horsfield in *The Nature of the Cairngorms*, 2006, HMSO). The Strathspey important area for invertebrates is the 2nd most important area in the northern Cairngorms and the 3rd most important in the whole of the Cairngorms area. This ranking of importance is according to the number of nationally important species. Nationally important species are defined as species with at least 10% of their UK range or population occurring in the area; or classed as Nationally Rare (occurring in fewer than 16 10-km squares in the UK); or nationally threatened; or whose presence in the Cairngorms is considered to be of international importance.

The Strathspey Important Area for Invertebrates overlaps with the Granish Invertebrates Register Site (e.g. SNH files December 6th 2001), which is another non-statutory designation.

Within these nationally important invertebrate areas there has been cumulative adverse impact around Granish, including direct loss of habitat due to expanding development footprint, for example with the expansion of the waste facilities of Highland Council and Ritchies and the new Aviemore sewage works.

In 2009 the CNPA welcomed Scotland's Invertebrate Conservation Strategy and stated that invertebrates are "one of the Cairngorms' special qualities" (see e.g. Sunday Herald 18.1.09). Buglife - the Invertebrate Conservation Trust has emphasised the very high importance of the Cairngorms for invertebrates, stating "More rare and threatened invertebrate species are found in the Cairngorms area than anywhere else in Scotland, or perhaps the UK". Buglife have also emphasised the threats from developments: "Current development plans are putting increasing pressure on these habitats and their wildlife, and there is a real risk that rare invertebrates could be lost for ever" (Sunday Herald 18.1.09).

Importance of habitats mosaic

The mosaic of habitats affected by the proposals (including broadleaved woodland, semi-improved grassland and heathland) is important, providing a range of habitats in close proximity that can be used by species for different purposes and/or at different stages of their life cycle. The proposals would impact negatively on this mosaic e.g. by reducing the area of semi-improved grassland and by reducing the quality of surrounding woodland through recreational impacts.

Negative Impacts of Road Widening

Widening the public road requires the loss of several trees including mature oaks. Stands of oak are a scarce habitat in Badenoch & Strathspey, and the oaks at Granish are a special quality of the CNP as well as a significant landscape feature beside this well-used road.

Negative Impacts on Landscape

The combination of such habitats as broadleaved woodland, semi-improved grassland and heathland is a valuable landscape feature that is characteristic of parts of Strathspey. The proposals would impact negatively on this attractive landscape.

Recreational Impacts beyond the proposal footprint

It is inevitable that users of the caravan and camping site will want to use the surroundings for recreational purposes. For example, paths will develop following desire lines and disturbance will increase which will impact negatively on a variety of biodiversity interests; dog mess will increase with adverse impacts on soil nutrient status (for example, significant for fungi).

Conflicts with the aims of the Park

The proposals conflict with the aims of the CNP.

1st aim: The proposals would impact negatively on the natural heritage and landscape of the proposed development site and the wider area.

2nd aim: The proposal would result in the further loss of lowland agricultural land, which is a finite resource that is subject to increasing pressures. Such loss should be viewed in the context of cumulative reduction of farmland of this type in Strathspey in recent years and in the context of developments in the pipeline. We note that further phases of this proposed development are under consideration which would significantly increase this impact.

4th aim: The economic importance of existing caravan sites is recognised by the CNPA, for example at Boat of Garten, Grantown on Spey etc. The proposed development would compete with existing businesses which could result in negative economic impacts. In relation to any claimed potential wider-spend economic benefits, we note that the development includes a shop which could have implications for existing businesses.

Conflicts with CNPA Policies

Policy 3: This development conflicts with this policy as it would adversely affect an ancient woodland site.

Policy 4: Wildcat - There is Wildcat prey (such as rabbits) and suitable habitat (including hunting areas) on and around the proposal site. We note that wildcat have been caught on camera in low ground in the strath (e.g. Carrbridge) and in areas where there was no idea they were present (e.g. the Highland Wildlife Park). We also note that wildcat can travel considerable distances and that habitat connectivity has important bearing on their favourable conservation status within their natural range. The proposals would reduce the connectivity and permeability of the proposal site and its surroundings.

Bats - Given the presence of trees with suitable roosting habitats for bats, the proposals could be significantly damaging to the favourable conservation status of bats in this locality.

Policy 5: The proposed development would impact negatively on biodiversity, including on a range of ecologically important species and species of national conservation concern.

Policy 6: The proposals would impact negatively on landscape, including the approaches to Aviemore.

Policy 22: There is conflict with this policy as the site manager could live in Aviemore rather than on site.

Policy 25B: The proposals conflict with this policy.

Policy 26C: The proposals are inconsistent with this policy.

Policy 33: The proposals do not comply with this policy.

Yours sincerely

Gus Jones

Convener

Brian Ledbetter
42 Eccles Road
London SW11 1LZ
Phone: [REDACTED]

19 June 2012

Mr. Andrew Tait
Cairngorms National Park Authority
Ground floor, Albert Memorial Hall
Station Square
Ballater, Aberdeenshire
AB35 5QB

RE: Proposed touring caravan park, Granish, Aviemore

Dear Mr. Tait,

I own Red Stag Lodge, which is adjacent to the site of the Granish Farm Partnership's proposed touring caravan park near Shunem Cottage at Granish, Aviemore. Red Stag Lodge is a family holiday home for our frequent, private use. It is not rented out.

This letter outlines several issues that I would suggest the Park Authority researches in-depth in the course of reviewing the application to build the park:

1. Vehicular access to the proposed park
2. The proposed park's linkage to the village of Aviemore
3. Drainage at the site
4. Potential increased light pollution by the scheme
5. Views and safety next to the A9
6. The potential economic viability of the park

CONTEXT

This letter is not a formal objection to the proposed park. In 2010, when I sought to purchase additional land from the Reidhaven Estate to expand my property at Red Stag Lodge, Allan Munro made his release of that land from Granish Farm contingent on me signing an agreement to not object to the proposed caravan park as planned at the time.

While the current plans for the caravan park have significantly changed from those to which the agreement is based in 2010, Mr. Munro has indicated that he

plans to make further alterations to the submitted plans to satisfy my immediate concerns about the amenity at Red Stag Lodge. In particular, this would be the inclusion of a planted buffer between the park and my property to shield the park from view and emphasize the separation between the properties. I look forward to reviewing Mr. Munro's amendments to his submission

The six issues that I suggest you research in this letter are in the spirit of ensuring that the proposed park is in the best interest of the community and preserving the ecology and aesthetic of the area.

KEY ISSUES

1. Vehicular access to the proposed park. The current road accessing the site is a primitive, unpaved remnant of General Wade's Military Road. Access to this road, particularly to vehicles travelling south on the B9152, is difficult due to the sharp angle of access and narrow width of the road. Although the proposed plans indicate a widened aperture to the access road, the Park Authority should review:

- The degree to which protected woodland will need to be cleared to widen this access (in particular the oak tree wood at that site)
- The impact of increased car and caravan traffic mixing with heavy goods traffic in that immediate spot due to the adjacent public tip, quarry, and potential karting track
- The safety for drivers (incl. articulated car and caravan) entering and exiting the site given the sharp angle between the access road and the B9152 even after widening

2. The proposed park's linkage to the village of Aviemore. The proposed park is relatively far from the village vs. other existing parks considering the amenities that it offers. For example, it does not offer a restaurant or notable recreational feature (e.g., lake) on-site. This increases the necessity for it to be convenient to the village. The Park Authority will want to review:

- The degree to which the public is likely to use the added foot path along the B9152 given other more convenient options exist closer to the village or other amenities for touring caravans
- Why the park cannot be sited in another part of the property at Granish Farm (on either side of the B9152) closer to the village

3. Drainage at the site. Currently the site (both proposed caravan and tent pitches on either side of General Wade's Military Road) flood regularly each year during snow run-off and heavy rains. In addition, during particularly heavy rains or accelerated run-off, the culvert and open creek to the north of the proposed "Phase 2" site is inadequate and overflows further. This will

require work in the construction of the site to stop this flooding and divert run-off. The Park Authority should review:

- Whether the proposed works can adequately address the flooding
- Whether modifications to stem this flooding will adversely affect the culvert and open creek which today provide water and habitat for wildlife
- Whether the full elimination of seasonal flooding at the proposed site of caravan and tent pitches will adversely affect wildlife

4. Potential increased light pollution by the scheme. Given the site's distance from Aviemore it currently avoids a significant amount of light pollution. This preserves natural beauty and avoids disturbance to wildlife. It should be noted that there are bats near the site (confirming the hypothesis in the mammal survey). The Park Authority should review:

- Whether the introduction of outdoor lighting within the park and along the proposed new path into Aviemore will increase light pollution in the area
- Whether potentially increased light pollution will adversely affect nocturnal wildlife at the site and in the immediate area

5. Views and safety next to the A9. Currently the site is immediately adjacent to and fully visible from the A9. Today, the view from the A9 is an undisturbed view through a simple barbed wire fence across the fields to the Cairngorm range. The introduction of the caravan park and the proposed buffer planting will interrupt these views. In addition, an unclimbable barrier built along the A9 for safety will introduce a significant man-made structure along the road. The Park Authority should review:

- Whether the introduction of the park, buffer planting and man-made safety barrier unduly spoil the views from the A9 toward the Cairngorm range
- That the specification of the safety barrier along the A9 is sufficient to protect potential visitors (including children) to the caravan park from dangerous traffic

6. The potential economic viability of the park. The proposed park is relatively modest in size at 33 pitches excluding tents. Even at 80% occupancy year round (which would assume a 100% occupancy at all other times if the park closes for 1 month for maintenance each year) it would be difficult to quickly recoup the up-front investment to build the park. The Park Authority should review:

- The degree to which the caravan park relies on developing a second phase in order to be a profitable ongoing concern in a reasonable investment window

- The degree to which the caravan park will rely on caravans staying more permanently parked on the site over the winter months to generate enough occupancy—creating a more permanent entity
- The degree to which the park will rely on income not from pitch hire in order to achieve profitability

CONCLUSION

I hope you find an articulation of these issues useful for your review of the proposed plans. If you require further details or information, please do not hesitate to contact me.

Best regards,

Brian Ledbetter