

# **AGENDA ITEM 6**

## **APPENDIX 4**

**2019/0347/DET**

**REPRESENTATIONS - OBJECTION**

# Comments for Planning Application 2019/0347/DET

## Application Summary

Application Number: 2019/0347/DET

Address: Balavil House Kingussie Highland PH21 1LU

Proposal: Formation of forest/woodland access track (in retrospect)

Case Officer: Edward Swales

## Customer Details

Name: Mr Nick Kempe

Address: 23 Queen Square Glasgow

## Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: My objection is not to the principle of a track in this location to assist with forest operations but to one element of the design/route and the spur off the main track to access pheasant feeders.

A short section of the track is too steep and contrary to SNH's best practice guidance. It will erode. The ecology report is right to recommend that no fine material be used to surface this section of the track as it will be quickly washed away but the aggregate below this will be subject to continued erosional pressure. As this section of track is short, rerouting it along a gentler but longer line would probably have a much greater impact, but ways need to be found to prevent it eroding. These could include water bars and a different type of surface, eg cobbles rather than compacted aggregate.

The spur off the track to access pheasant feeders which has already been constructed should be restored. The CNPA should not be encouraging/facilitating estates to release alien game species. I accept that the CNPA does not control the release of game birds at the current time but it should not be assisting infrastructure related to this. If the estate wants to place pheasant feeders in wooded areas it could do so by the section of track which is now to be directed through the wood. Its very welcome that since the application was submitted CNPA staff have got the estate to agree that the line of the track which had not been construction prior to this planning application might be directed through the wood rather than around the top of it. That is an improvement on the original proposal.

BSCG  
info

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From: BSCG info  
Sent: Mon, 2 Dec 2019 23:48:16 +0000  
To: Planning  
Subject: 2019-0347-DET Objection

## Badenoch & Strathspey Conservation Group

Fiodhag, Nethybridge, Inverness-shire PH25 3DJ

Scottish Charity No. SC003846

Email [REDACTED]

Website [bscg.org.uk/](http://bscg.org.uk/)

2 December 2019

Dear Ed Swales

2019/0347/DET | Formation of forest/woodland access track (in retrospect) | Balavil House  
Kingussie Highland PH21 1LU

BSCG wishes to object to the above application. We request the opportunity to address the planning committee when this application is considered.

It is disappointing that this is a retrospective application and that major construction works have already been undertaken. Balavil Estate engaged with the CNPA planning team over a controversial track to the River Dulnain (2018/0400/DET) a year ago and it is hard to understand why the estate has subsequently made a retrospective application.

Part of the purpose of the track is to facilitate pheasant rearing for sport.

Pheasants can have significant ecological impacts, including on slow worms, common lizards and adders, all of which pheasants are known to predate. These three species are on the Scottish Biodiversity List and are UKBAP species and have the potential to be present in the vicinity of the proposal.

Pheasant rearing can also have implications for local populations of opportunistic predators of ground nesting birds such as woodcock.

There are also cumulative impacts with other developments, that have been approved, such as the housing on the former sawmill site on Rothiemurchus and An Camas Mor. We are concerned that these species were not included in the ecological survey relating to this proposal.

We are concerned at the impact of the proposal on woodland on the Ancient Woodland Inventory of semi natural origin. In this context all aspects of the woodland habitat are

important and merit protection and appropriate management, including soils, ground vegetation and drainage and hydrology.

Some of the habitats in the vicinity of the proposal are of particularly outstanding quality in our view.

We are concerned that the spur track does not appear to have been included in the ecological survey.

In the context of the climate and ecological emergency, the impact of pheasants on biodiversity is of particular concern.

We are concerned about the ecological impacts of this new track. A major plank in the CNPA's Capercaillie Framework is the expansion of suitable habitat for capercaillie that will enable the Scottish population to increase in numbers and expand in distribution and achieve favourable status in the future. A crucial aspect of the success of this is human disturbance. The new track connects with other routes and is likely to promote a range of recreational activities and associated disturbance pressures.

Croftcarnoch plantation is dominated by Scots pine and provides potentially suitable habitat for capercaillie. The combination of the new track and other tracks creates a circular route all the way around Croftcarnoch plantation.

In relation to capercaillie and potential Schedule 1 breeders, there has been no assessment of potential impacts associated with increased recreational pressure.

We query the conclusion that a HRA is not needed.

It is not clear whether ecological survey work has been undertaken to cover the route in the updated site plan.

We are concerned at the landscape impacts of the track in this exceptionally scenic area. In addition, we are concerned at the irreversible alterations to natural landforms and geomorphology.

Yours sincerely  
Gus Jones  
Convener