

AGENDA ITEM 7

APPENDIX 3B

2021/0112/DET

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PUBLIC COMMENTS
OBJECTIONS

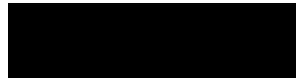
Deirdre Straw

From: BSCG info <info@bscg.org.uk>
Sent: 10 May 2021 23:49
To: Stephanie Wade; Planning
Subject: 2021/0112/DET BSCG Comment

Categories: For Dee

Badenoch & Strathspey Conservation Group

Fiodhag, Nethybridge, Inverness-shire PH25 3DJ



Scottish Charity No. SC003846

Email info@bscg.org.uk

Website bscg.org.uk/

Stephanie Wade

CNPA

Grantown on Spey

10 May 2021

Dear Stephanie Wade

2021/0112/DET | Reconfiguration of existing car park and provision of infrastructure for camper van overnight facility | Cairngorm Mountain Ciste Car Park Glenmore Aviemore Highland PH22 1RB.

I am writing to object to the above application, and BSCG would like to request the opportunity to address the planning committee remotely when the application is determined, which we understand will be on 14 May.

Impacts on Glenmore Forest

The Ciste car park is about 1/2km from the southern edge of the eastern part of Glenmore Forest. There is now established natural regeneration [REDACTED] with self-sown trees, mostly Scots Pine, spreading to the south. Glenmore forest is therefore naturally expanding up the hill, by natural regeneration.

[REDACTED] It is important to recognise that Glenmore is one of the most important core areas for capercaillie in Scotland, [REDACTED]

[REDACTED] is highly significant in terms of capercaillie conservation.

[REDACTED] If this [REDACTED] is to provide lasting benefit to capercaillie [REDACTED] it is imperative that levels of recreational disturbance are not too high.

The critically low population of capercaillie and their dependence on the forests of Strathspey is well established, as is their sensitivity to disturbance from people and dogs.

Capercaillie have been declared effectively extinct at Loch Lomond and there are very serious concerns over their viability outwith the core Strathspey metapopulation. The Strathspey forests are now vital for the future of capercaillie in Scotland and we must ensure that we do not impact the viability of capercaillie in any of the Strathspey forests.

[REDACTED]

The CNPA Capercaillie Framework states:

“With capercaillie populations at such vulnerable numbers, any factors that could impact on the breeding success of individual birds could have significant impacts for the population as a whole”.

We consider, there is every likelihood the proposal would affect breeding success and consequently the population as a whole. This area of Glenmore has long been known as key for capercaillie, and this is reflected in forest management.

There is a worrying level of existing recreational use [REDACTED] The formalisation of a 50-motorhome facility at the Ciste car park, and the social media ‘chat’ that would accompany this, is very likely to increase recreational disturbance to the surrounding area by people and their pets, from walking, running and biking. [REDACTED] the Glenmore visitor centre and café, links with many other routes in Glenmore, and thereby offers a variety of attractive circular round trips of a range of distances.

The CNPA’s Capercaillie Framework states:

“The Strathspey capercaillie population is crucial to the long-term survival of the species in the UK. This places a significant responsibility on CNPA and our partners to take a strategic approach to management for this population and work at a landscape scale if we are to save this species”.

There is a powerful body of scientific evidence that capercaillie are significantly sensitive to disturbance.

This is acknowledged in the CNPA's Capercaillie Framework which states that: "Capercaillie are sensitive to disturbance and predation at all life stages especially when attending leks, incubating eggs or rearing broods".

Visitor Management Plan.

The VMP makes no reference to people walking or biking down the Allt na Ciste path into the forest.

[REDACTED]

Environmental Impact Assessment

The EIA provides no evidence or even a rational justification for the conclusion reached of "no significant effects are anticipated". This assertion does not follow a precautionary approach and can be considered extremely reckless.

We note that the "essential actions" of the Cairngorms Capercaillie Project include "Improving and creating more habitat for capercaillie...in key areas." There appears to be a failure to properly recognise that the area [REDACTED] set to be impacted by the proposal is a crucial key area of unparalleled importance in Scotland to capercaillie conservation.

Habitat Regulations Assessment

Glenmore is of national importance for capercaillie. It is the responsibility of the CNPA to ensure there is no adverse affect on the viability of capercaillie [REDACTED] There is reasonable scientific doubt about the effects of the proposal [REDACTED]

We do not accept that motorhome users will not alter [REDACTED]
For example, people have multiple reasons to seek new routes, such as to avoid paths being used by other dogs, or slower recreational users.

Additional use would increase disturbance. It is established that more use by people adds to disturbance and the distance of avoidance by capercaillie. This effectively diminishes and fragments habitat.

We do not consider that the proposed mitigation is adequate to prevent additional adverse disturbance to capercaillie.

Yours sincerely

Gus Jones

Convener

