

AGENDA ITEM 5

APPENDIX 4a

2018/0046/DET

**REPRESENTATIONS -
OBJECTIONS**



www.cairngormscampaign.org.uk

Email: cairngormscampaign@gmail.com



The Firs
Crathie
Ballater
AB35 5TJ

5th March 2018

Reference Planning Application 2018/0046/DET Erection of 25 dwellings 130m south of Meadow View
Carrbridge

The Cairngorms Campaign objects to this planning application as it conflicts with the No1 aim of the National Park.

As indicated by SNH and RSPB this development threatens capercaillie which the CNPA has stated it wants to support. Capercaillie are at risk from disturbance by this development and the CNPA cannot guarantee or demonstrate ahead of implementation that a recreation management plan will prevent further disturbance. For 25 houses it is not worth the risk. (Consider the numerous encounters with dog walkers during the ground nesting bird breeding season when dogs are not close to heel/on leashes).

The site is adjacent to woodland on the Ancient Woodland Inventory in the category ancient and semi-natural origin. It is well established that development adjacent to such, impacts on it through garden escapees, garden refuse and lawn clippings and soil degradation from dog excrement. The CNPA will be unable to change peoples' behaviours and prevent such happening.

The site is adjacent to bog woodland, which is a UK Priority habitat and will be degraded as a result of this development.

The site has a high natural heritage value with Scottish Biodiversity List and UK Priority species recorded on it, the very habitat the CNPA is supposed to be protecting.

Susan Matthews on behalf of the Directors and members of the Cairngorms Campaign

From: [REDACTED] behalf of BSCG info
Sent: Mon, 5 Mar 2018 23:51:04 +0000
To: Planning
Subject: 2018-0046 comments

Badenoch & Strathspey Conservation Group

Fiodhag, Nethybridge, Inverness-shire PH25 3DJ

[REDACTED]
Scottish Charity No SC003846

Email info@bscg.org.uk

Website bscg.org.uk

5 March 2018

Dear Katherine

2018/0046/DET Erection of 25 no dwellings and associated infrastructure, landscaping and parking Land 130M South Of Meadow View Crannich Park Carrbridge

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

Wildcat - European Protected Species

The proposal site lies within the Scottish Wildcat Action Northern Strathspey Priority Area. It is our understanding that wild living cats with 'good' wildcat features have been recorded on the outskirts of Carrbridge.

A walkover survey is inadequate as a means of surveying for wildcat. As is well documented, they are highly secretive, elusive and do not leave evident signs. To provide meaningful information, a survey using baited camera traps is necessary.

Brown Hare - Scottish Biodiversity List, UKBAP

Brown hare are known to make significant use of the proposal site.

Red squirrel

Dreys have been recorded on the granny pine near the road.

Badger

Known from the general area.

Hedgehog

Not recorded but may use the site.

Spiders

Spiders recorded from the site or close by, include the following:

A Jumping spider *Tallavera aequipes* in the bog woodland by the site. There are only a handful of Scottish records (c. 4 others since 1990). Scottish sites include Flanders Moss, Abernethy and Culbin.

Gallows spider *Dipoena torva* on the site.

Pirata uliginosus on the site, a wetland wolf spider, rarely collected.

Pardosa prativaga wolf spider, few records, scarce in northern Britain.

Sintula corniger nationally scarce, watching brief amber

Wood Ants

A nest of *Formica exsecta* IUCN Red list category 'Endangered', Scottish Biodiversity List and UKBAP has been recorded from the site.

We are concerned at the proposals to translocate wood ant colonies, the receptor site and how successful translocation will prove.

The Shining Guest Ant *Formicoxenus nitidulus* is one of the species of myrmecophile supported by wood ant nests. No survey has been undertaken for this species. The Shining Guest Ant is on the Scottish Biodiversity List and accordingly is a species that Scottish Ministers consider to be of principal importance for biodiversity conservation in Scotland and to which the 'biodiversity duty' of the Nature Conservation (Scotland) Act 2004 applies. The shining guest ant is shortlisted on the Cairngorms National Park Authority's Cairngorms Nature Action Plan, and thus identified by the CNPA as requiring urgent, focused conservation action over the 5 years of the Action Plan (2013-2018).

Other Invertebrates

Bug *Chartoscirta cocksii* possibly the first record for the Cairngorms NP and 3rd for Scotland.

Rosechafer beetle *Protaetia metallica* Nationally Scarce Notable B. This species is associated with wood ants and can be viewed as an important pollinator. It has suffered cumulative loss of habitat from other development e.g. at Grainish.

5 spot Ladybird *Coccinella quinquepunctata* Endangered in Britain, unusual find away from river shingle habitat.

Blaeberry or Mountain bumble bee *Bombus monticola* an important pollinator of blaeberry, that is a significant food plant for capercaillie. This bee has declined in the UK.

Butterflies recorded on the site include:

Small pearl bordered fritillary UK Priority Species, SBL, Near Threatened.

Northern brown argus UK Priority Species, SBL, Vulnerable

Small Heath UK Priority Species, SBL, Near Threatened

Scotch Argus

Dark green fritillary

Common blue

Orange tip

Small tortoiseshell

Painted lady

Peacock

Meadow brown

Ringlet

Haworth's minor *Celaena haworthii* UKBAP, SBL

Cousin German *Protolampra sobrina* UKBAP, SBL, Rare in the UK

Flowering Plants

In recent years the site has supported:

Field Gentian *Gentianella campestris* UKBAP, Scottish Biodiversity List, IUCN Red list category 'Vulnerable';

Heath Cudweed *Gnaphalium sylvaticum* Scottish Biodiversity List, IUCN Red list category 'Endangered';

Heath Dog Violet *Viola canina* of National Conservation Concern and 'Local' in the Cairngorms.

Close to the site and within (or perhaps partly within) the Ancient Woodland is a significant population of the Nationally Scarce plant Coralroot orchid *Corallorhiza trifida*. This is the largest known population in the Cairngorms National Park. This orchid is susceptible to pollution as a result of the proposal and also to destruction through trampling. The plant itself is delicate and easily overlooked. It is growing in a wet and fragile environment that is readily accessible from the site and which people would naturally cross in order to access other parts of the woodland. It is therefore particularly vulnerable to being damaged and destroyed.

Fungi

In recent years the site has supported grassland fungi including Blackening waxcap *Hygrocybe conica*, *H. coccinea* and Snowy waxcap *H. virginea*.

Ancient Woodland Inventory

The site is adjacent to (and perhaps partly within) woodland on the Ancient Woodland Inventory in the category Ancient of semi-natural origin. The development would impact

negatively on this AWI woodland. The report ‘The impacts of nearby development on the ecology of ancient woodland’ (Corney et al 2008) identifies multiple ways in which development may impact on ancient woodland, such as invasion of non-native species from gardens; garden refuse, lawn clippings etc being put over the garden fence into the wood; disturbance impacts from people and pets (for example, dogs disturbing ground nesting birds, and cats predated wildlife including red squirrels, bats, lizards and birds); impacts on soil, plants and fungi of dog droppings.

Bog Woodland

The site is adjacent to Bog woodland, which is a UK Priority habitat. The development could impact negatively on the bog woodland through pollution and intrusion of materials (such as soil). Post construction the development could impact negatively through trampling impacts. It was established on the site visit that development would threaten this habitat.

CNPA planning paper of 9 March 2007 states that there should be no development within 25m of the bog woodland.

Impacts on Wetland Habitats

The proposal impacts directly and indirectly on wetland habitats. The SUDS pond will impact on existing wetland. This is contrary to best practice.

Recreational impacts

We consider that the proposal will have recreational impacts outwith the proposal site. For example, residents will create new paths in the adjoining woodlands and add to recreation impacts on capercaillie and other species.

We dispute SNH's assertion that “The potential increase in residents is unlikely to result in any change to the existing patterns of recreation in the area or increased disturbance to capercaillie in any SPA or in nearby undesignated woodlands that are home to capercaillie”.

The proposal places 25 households adjacent to a different area of woodland that at present is little visited. We consider it highly likely this area of woodland will receive substantially more uses than it does at present and that paths will be developed in this area of woodland. In our view this is a change to the existing pattern of recreation. Also,

people create short cuts and favoured routes specifically to and from access points into the outdoors near their home, resulting in an increase in small paths.

In addition, increased numbers of people tends to result in changes to recreational patterns. Some people prefer to enjoy the outdoors at times when they know they are unlikely to meet other people and in places that are little visited by other people. This results in recreation impacts expanding and changing.

Also, recreation activities are developing and this also changes patterns of recreation. For example, night time cycling, running etc is gaining in popularity, as is downhill mountain biking, and the use of electric bikes.

We also do not agree with SNH's assertion that "Recreational routes suitable for walkers and cyclists which avoid sensitive habitats and species already exist within Carrbridge plantation". Carrbridge plantation provides potential habitat for capercaillie but it is not used by capercaillie, and recreational disturbance is highly likely to be a significant reason why not.

Capercaillie

The CNPA needs to address the fact that capercaillie are at an extremely low population level at present and their range has contracted significantly. Both these trends need to be reversed for capercaillie to be returned to favourable conservation status. We realise that the CNPA is encouraging the creation of new forests that the Authority hopes will provide suitable habitat that will be used by capercaillie. However, there are significant uncertainties associated with any such forests as well as long timescales and we regard it as unreasonable to place any reliance on them at this stage.

Yours sincerely

Gus Jones

Convener