

AGENDA ITEM 8

APPENDIX 4

2015/0375/DET

REPRESENTATIONS OBJECTION

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21 December 2015

Dear Planner

2015/0375/DET Use of land for siting of 10 no Wigwams (renewal of permission
2012/0120/DET(12/01400/FUL)) Speyside Trust.

BSCG wishes to object to this application for reasons that include those provided below.
We request to address the committee when this application is determined.

We understand that the Speyside Trust has repeatedly apparently misled the planning authorities with respect to material planning considerations at this site, which potentially have significant implications for conservation priorities, including at an international level. The CNPA will be aware of a long history of planning breaches at this site.

The supporting information for the application states:

"This will effectively substitute use of the 10 established all season wigwams adjacent to the centre's main facilities for seasonal use of 8 wigwams which are remote and only suitable for seasonal use.

For all 12 of the new wigwams, the reseeding and landscaping is not yet properly established to an acceptable and comparable standard with other centre facilities. In addition to their exposed location they are surrounded by an extensive area of commercial clear felled plantation. This will restrict use in order to avoid generating visitor complaints."

We would like to draw to the CNPA's attention that all 22 wigwams are promoted on the Speyside Trust website for all year use with no indication of any restricted use or seasonal use. It appears to us that it is misleading to indicate that there would be any substitution of wigwams.

The supporting information also states:

"Current Position

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Development of the new campsite is now at a position where it provides permanent sites for 12 wigwams which can be brought into limited use."

The 12 wigwams relating to the 2011 reference have been in full use for months. They appear to have been advertised as available for full use since the summer and it appears to be misleading to indicate that they "can be brought into limited use".

We urge the CNPA to diligently and accurately establish the veracity of all the applicant's claims. We are concerned that in the past the CNPA has uncritically accepted demonstrably inaccurate information from the applicant.

In relation to the applicant's comments about the lack of landscaping and consequent lack of attractiveness of the area around the 12 wigwams, it should be noted that the landscaping of this is the applicant's responsibility and is a condition of their permission, and they apparently could have initiated some of the landscaping works (e.g. away from the cycle trail works area) some considerable time ago.

All the wigwams are not wheelchair accessible, with a step at the front door and no provision for space for wheelchair/s inside.

BSCG has major concerns at the number of bed spaces available at Badaguish. The 35 wigwams already permissioned, at 5 beds per wigwam, provide 175 bed spaces per night. This is far in excess of many sizeable hotels in Strathspey. Even if the 35 wigwams only had two occupants it would equate to 70 bed spaces, which again, is more than many local hotels.

Given potential significant adverse impacts on Natura interests at Glenmore, the CNPA as the competent authority should not be sanctioning any expansion of accommodation at this site. There would be an expansion in accommodation if the CNPA were to permission the 10 pilot wigwams in addition to the 35 already permissioned.

The applicant refers to 40 bed spaces for the 10 wigwams. However, according to the information recently provided by the applicant to the CNPA each wigwam sleeps 5, making 50 bed spaces.

We cannot understand how a further 40 or 50 bed spaces from the 10 wigwams of the pilot scheme can be justified. The CNPA should refuse any additional accommodation over and above the already permissioned 35 wigwams.

Badaguish is a highly sensitive location. It is some 300m from a European site for which capercaillie is a qualifying feature. Capercaillie are well known to be sensitive to disturbance. Sensitivity to recreational disturbance and habitat change near to potential breeding areas are subjects that have informed the CNPA's 2015 'Capercaillie Framework' that indicates it has a purpose "To increase the Capercaillie population by coordinating deployment of management measures at landscape scale to expand functioning habitat and reduce disturbance ..". Expanding functioning habitat and reducing disturbance are not achieved by consenting development that adds to disturbance in capercaillie habitat. Badaguish is within an area of Glenmore that supports blackgrouse and other sensitive biodiversity interests vulnerable directly or indirectly to recreational pressure.

We note that the Visitor Management Plan recently provided by the applicant is based on improbable assumptions about the behavior of visitors to Badaguish. From our own direct

observations we find these assumptions are unsound and consider them to have been overstated.

We respectfully request the CNPA to bottom out inconsistent figures provided by the applicant over time, in relation to occupancy, bed spaces, capacity, flows and loads and related issues at Badaguish, so that the CNPA properly understands and is fully aware of the level of accommodation at Badaguish, and consequent multiple impacts, including on infrastructure and natural heritage.

Yours sincerely

Gus Jones
Convener

