

AGENDA ITEM 7

APPENDIX 4

2022/0023/DET

**REPRESENTATION
GENERAL**

BSCG
info

From: BSCG info
Sent: Mon, 21 Feb 2022 23:31:30 +0000
To: Edward Swales
Subject: 2022/0023/DET Comment

Badenoch & Strathspey Conservation Group

Fiodhag, Nethybridge, Inverness-shire PH25 3DJ

Scottish Charity No. SC003846

Email info@bscg.org.uk

Website bscg.org.uk/

edwardswales@ Cairngorms.co.uk

21 February 2022

Dear Ed Swales

2022/0023/DET | Formation of access hill tracks adjacent to (1) Base Station and (2) Shieling | Land 1200M Ne Of Coire Cas Car Park Cairngorm Mountain Glenmore Aviemore

BSCG is commenting on this proposal but not objecting to it.

We are concerned that the CNPA should fully recognise the sensitivities of the ground within the red line boundaries of this application and the surrounding area. This area should be treated as likely to be supporting significant biodiversity interest. It is important to recognise that this development will cause additional adverse impacts to the sites. We urge that appropriate measures are taken to both reduce these and strictly minimise habitat damage, and to ensure that best practice is achieved during construction and operation.

It is of concern that specific on-site ecological surveys do not appear to have been undertaken for this application. In view of the nature emergency, we find this particularly disappointing.

Previous surveys, and other records, indicate that the Cas area has high biodiversity interest.

The proposal site is close to the Cairngorm Important Plant Area and there are likely to be species of value within the site including mosses, liverworts, lichens and fungi. A nationally rare lichen was recorded in the survey associated with the 2018 application for an artificial ski slope. There are sensitive habitats contributing to supporting birds including ring ouzel (UK red list of birds of conservation concern). Invertebrates recorded during the survey associated with the artificial ski slope included 6 nationally scarce species of fly associated with wet flushes. And the proposal site is not far from the location where a springtail new to Britain was relatively recently discovered, which as far as we know is still only known in Britain from this single location.

Yours sincerely

Gus Jones
Convener