



Cairngorms
National Park Authority

Ùghdarras Pàirc Nàiseanta a'
Mhonaidh Ruaidh

Item 7 Appendix 3b 26 January 2024

Agenda item 7

Appendix 3b

2023/0300/PPP

Representations - general

Ref: 2023/0300/PPP

Land 80m SW of Inshcraig, Insh

Proposed 'Community Housing' development by Cathryn Williamson, Balnespick Farm

We consider ourselves fortunate and very privileged to live in such a diverse landscape, reassured by the knowledge that all its ecosystems; from broad straths to high mountain plateaus, its culture and heritage lie beneath the umbrella of the Cairngorms National Park Authority. This fact encouraged our move here over a decade ago and is the reason why local businesses benefit from similar minded people who are attracted to the CNP every year.

While the proposed development by Cathryn Williamson may at first seem innocuous, just 3 houses to be built on low-grade agricultural land, our fear is that by granting planning in this instance it may set a precedence for future developments within the Park that are currently out-with the CNP plan. Piecemeal development, even on this scale, fragments an otherwise 'wild and extensive' landscape that is the CNP. Furthermore, what is often perceived as 'low-grade' agricultural land often indicates 'high-value' biodiversity habitat. In this context 'wet grassland' and brown hare, are amongst other important habitats/species that occur on the proposed site for development. How does the CNP reconcile the proposed development and compliance with 'The UK Habitats Directive and Habitat Regulations and the broader framework of the European Habitat Regulations? Both are endorsed and implemented in Scotland through the 'Scotland Habitats Directive' to provide protection to vulnerable and scarce 'Habitats and Species'. European Union Council Directive 92/43/EEC on the conservation of natural habitats and wild fauna and flora. This is a major contribution by the European Community towards realising the Convention on Biological Diversity agreed at the 1992 Rio Earth Summit. In Scotland the Habitat Directive is translated into specific legal obligations by the convention, Natural Habitats Regulations 1994.

The Habitats Regulations have been amended in Scotland, most recently in 2019 as a result of the UK leaving the EU. These amendments mean that we must continue to apply the requirements of the Habitats and Bird Directive as to how European sites are designated and protected.

The Scottish Biodiversity Strategy identifies that biodiversity conservation calls for an ecosystem approach. This approach recognises that nature is a system of many functioning parts that work in balance with each other. Nature provides us with many benefits, called ecosystem services, though they're not always obvious to us, such as air, food, water, stable living conditions, beauty and inspiration. Adopting an ecosystem approach can help to secure these benefits for us now, and for future generations. Adopting an ecosystem approach involves identifying an ecosystem's parts, and interacting with them in a way that keeps them healthy. This involves collaboration between a wide range of organisations, government departments and businesses.

The Scottish Government 2020 Statement of Intent on Biodiversity outlined the commitment to protect at least 30% of our land and sea for nature by 2030. The 2021 Programme for Government committed to the deployment of Nature Networks. These two are key components

in increasing ecological connectivity and restoration of nature more widely, helping to deliver the Scottish Biodiversity Strategy.

In December 2020 the Scottish Government published the 'Scottish Biodiversity Strategy Post 2020': a statement of intent with the aims to –

- Protect and restore diversity on land and in our seas, and to support ecosystems
- Connect people with the natural world, for their health and well-being, and to involve them in decision making procedures
- Maximise the benefits for Scotland of a diverse natural environment and the services its contravention provides, contributing to sustainable economic growth

Disturbance or potential habitat loss on the site of the proposed development may not comply with the Scottish Biodiversity Strategy on priority habitats and species. I suggest the Planning Authority need to instruct the Developer to produce a full 'Environmental Impact Statement' in support of the proposed development, and I would urge a full invertebrate survey to be a key element of such a report.

The entrance track to the proposed development is wet, often lying under water for weeks at a time, especially during winter, and will require ground works to provide year-round access. Any drainage works, other than significantly raising ground levels to elevate the access are likely to affect a greater area of wetness than just the access track and further impact on local biodiversity, amphibians in particular, especially newts.

The site entrance to the proposed development raises more issues. The site entrance will be off a single-track road, already under heavy usage by people and vehicles gaining access to the picturesque Glen Feshie/Uath Lochens, and connecting to the B970 by way of a 'blind' bend that would require substantial works to make safe.

Fragmented and piecemeal developments, like the one proposed, detract from the very essence of maintaining a cultural, historical and environmental landscape, the core values of the CNP; a landscape of agriculture, woodland, forestry and mountain supporting a wealth of wildlife and creating a sense of wellbeing for locals and people travelling to enjoy the heritage afforded by Scottish Highlands.

Only recently did the CNP negotiate a mitigation clause to remove overhead pylon lines across the proposed development, to accommodate power distribution works undertaken elsewhere within the National Park. These high voltage cables were buried in the vicinity of the proposed development and to relocate these cables will be, perhaps, cost prohibitive and cause further damage to the local environment.

Best Regards

