

AGENDA ITEM 5

APPENDIX 3A

2020/0201/DET

**REPRESENTATIONS
GENERAL**



Emma Bryce
Planning Manager (Development Management)
Cairngorms National Park Authority
14 The Square
Grantown-on-Spey
PH26 3HG

Dear Emma

APP/2020/1566

**Land To The North And North East Of Tomidhu, Crathie, Ballater, Aberdeenshire
Erection of 18 Hut, 4 Compost Toilets and Associated Access, Car Parking and Landscaping**

I am writing on behalf of Butterfly Conservation Scotland to highlight our concerns over the above application due to the presence of an important assemblage of rare and threatened Lepidoptera.

The north-western half of the development site lies within the Crathie Wood SSSI (Site of Special Scientific Interest). The SSSI is designated in part due to the importance of its invertebrate assemblage which is identified as a Notifiable Feature. It is therefore important that the proposals do not compromise the objectives of the SSSI designation.

We have recently reviewed our conservation priorities in Scotland with the production of our Scottish Conservation Strategy (SCS) which identifies the country's most threatened species and thus those most in need of conservation action. The proposed development falls within Butterfly Conservation Scotland's Deeside Priority Landscape one of eighteen landscapes across Scotland that identify the country's key areas for threatened Lepidoptera. The boundaries of these Priority Landscapes are drawn up to encompass networks of sites supporting one or more linked colonies, or sub-populations, of threatened species.

It is vital that sub-populations are linked, acting as stepping stones across the landscape, thus preventing genetic isolation and greatly reducing the possibility local extinction. If any of the sub-population locations are lost, then the others become more isolated and the overall set of sub-populations becomes fragmented, with the risk that eventually even larger sub-populations may become extinct and the whole population may fail. This highlights that sub-populations both on and off the SSSI are of equal significance.

The following SCS species have been identified as occurring on the site or close by within the SSSI and are therefore potentially detrimentally impacted by the proposal.

- **Dark Bordered Beauty - *Epione vespertaria* (HA)**
- **Northern Brown Argus - *Aricia artaxerxes* (HB)**
- **Pearl-bordered Fritillary - *Boloria euphrosyne* (HA)**
- **Cousin German - *Protolampra sobrina* (M)**
- *Exaeretia ciniflonella* (HB)
- *Dichomeris juniperella* (HB)

HA = High Priority Species Action urgent across all occupied landscapes/sites

HB = High Priority Species Action necessary in some occupied landscapes/sites

M = Medium Priority Species

Species in bold are also Scottish Biodiversity List Species

In addition, the following scarce species, that have no formal designation, also occur

- *Cydia coniferana*
- *Bryotropha galbanella*
- *Roeslerstammia erxlebella*
- *Phiaris metallica*

The site's two most important species are Dark Bordered Beauty and Northern Brown Argus. There are only three populations of Dark Bordered Beauty in Scotland, all within the Cairngorms, and one in England. In Scotland the moth is solely associated with aspen, the larvae feeding on their short suckers. The moth was first found on the site in 2013 and annual surveys have proved it still to be present this year both in the east and west of the site. It is very pleasing, therefore, to note that there are measures in the Woodland Management Plan to enhance the habitat for Dark Bordered Beauty, including the erection of four small exclosures to allow the aspen suckers that are currently being kept in check by rabbits and sheep to get away. However, it should be borne in mind that the erection of exclosures to enhance sucker growth will only be successful in the short-term and subsequent management, including cyclical clearance and/or erection of additional exclosures, will be required to ensure there is always suitable habitat for the moth. In addition, a proportion of suckers should be allowed to mature to become the next cohort of adult trees to improve the age structure of the aspen in the woodland and be the source of future suckers. Similar exclosures are currently being used successfully to enhance Dark Bordered Beauty habitat at some of its other extant sites in the Cairngorms.

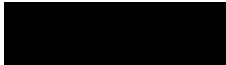
Northern Brown Argus is associated with Common Rockrose, its sole larval foodplant. It appears that the butterfly was formerly more widespread and numerous at the site, especially in the late 1970's, and has subsequently declined. The exact reasons for this are unclear but it probably corresponds with a reduction in Rockrose and where it continues to persist the plants are probably too short, as the butterfly preferentially selects plants growing in a medium to tall sward to lay their eggs. The reduction in Rockrose height and occurrence may be due to excessive grazing by deer, sheep and or rabbits as well as trampling and compaction by pedestrians and vehicles.

The other listed lepidoptera are predominantly woodland or woodland edge species mostly reliant on birch, juniper and blaeberry. It is therefore imperative that the current woodland remains intact and felling, e.g. for firewood etc, prevented.

Given the importance of the site and species BCS is willing to work closely with the landowner, and/or their agent(s), and others to provide the necessary expertise to ensure that the proposals minimise the impact on the priority species and ideally, particularly in the case of Dark Bordered Beauty and Northern Brown Argus, grasp the opportunity to enhance their habitat and thus populations.

Please do not hesitate to contact me if you require any further information.

Yours sincerely

A solid black rectangular box used to redact the signature of Tom Prescott.

Tom Prescott
Senior Conservation Officer
Butterfly Conservation Scotland