

AGENDA ITEM 10

APPENDIX I

PRE APPLICATION ADVICE SERVICE: RESPONSE

Planning Ref:	18/01979/PREAPP (CNPA Ref. PRE/2018/0018)
Proposal Name	Re-structure of Rothiemurchus camp & caravan site, Coylumbridge
Date of Meeting	30 May 2018
Date of Response	14 June 2018

Response

General and Policy Background

The proposal seeks to restructure the existing campsite in the north and utilise an area to the south of the existing active campsite for the purpose of touring pitches. The area to the south has been used previously for touring pitches and already has a track and hard standing for pitches.

This proposal will be considered in relation to the policies of the Cairngorms Local Development Plan (LDP) 2015 and associated supplementary guidance as well as any other material considerations that may apply including the National Park Partnership Plan and Scottish Planning Policy.

The LDP and associated guidance are available on this web link:

<http://cairngorms.co.uk/park-authority/planning/>

Environmental Impacts

Policy 4: Natural Heritage of the LDP states that all new development fully considers the impact on protected species and ensures that appropriate measures are in place to avoid, reduce or mitigate any impacts.

Plans have been provided which indicate where new pitches are proposed, tracks realigned and where some tree removal is anticipated. The plans show "tree" and "general" target notes but no background information is provided to explain what these are. Anthill target notes are shown to indicate where wood ant nests are and there are target notes for notable fungi.

A site visit was conducted by the CNPA Ecology Advisor on the 21st May 2018. It was noted that there are more wood ant nests present than indicated on the plan. Also tree removal is likely to be much more extensive than indicated on the drawings provided (southern part). There are also a number of large junipers which are likely to be impacted (southern part).

Northern part of the site

The plan provided of the northern part of the site is not easy to interpret – it is not clear which pitches are existing and which are new. Restructuring/moving of cabins and static caravans could require tree removal or limb removal and this is not clearly shown on the plan.

Southern part of the site

This area comprises of semi-natural woodland of high ecological value, supporting native tree and understory species and colonies of wood ants, a Cairngorms Nature Action Plan species (see figure 5). The woodland is listed in the Ancient Woodland Inventory as category 1a (semi-natural woodland from maps of 1750). This area has been previously adapted for use as a campsite and has a circular track and several existing pitches.

Creation of new track and provision of new touring pitches will require tree loss and disturbance to wood ant nests. Some tree loss is shown on drawings but this is likely to be a significant underestimate given the need for a new section of track through woodland (figure 4) and realignment of a track to the south side of the croft. Many of the pitches have trees shown on top of them, which include mature birch, pine and juniper. The pitches which are existing, are restrained by surrounding trees, vegetation and in some cases landform (figure 3). It is not clear if the southern section will be used for campervans/motorhomes or touring caravans (or both). It is likely that the existing pitches will require to be widened to accommodate campervans, caravans (which need substantial turning space), vehicular parking and outdoor space for guests. This is likely to require tree and habitat loss and therefore impact on the woodland in this area. Although some of the pitches do have existing hard standing, several of the pitches do not and would require excavation and loss of woodland habitat (figure 1 and 2).

There is a small burn that passes through this area from north to south, through the woodland in the centre. Creation of pitches and track in this area has potential to impact on this burn during construction. This burn connects to the Am Beannaidh, which forms part of the River Spey SAC. The burn is within a natural hollow and one of the pitches proposed in this area is within this hollow where habitats are likely to be wet – it's not known if this burn is subject to flooding but this will need to be considered, as will the requirement to achieve dry, level ground which is will impact on habitat and trees.

In addition, this area appears to have no provision for ground based electricity hook-ups or water and this will require installation, which may result in further habitat disturbance.

There is an old derelict croft house (Lairig Ghru cottage) situated in this area which is likely to be demolished (judging by the drawings and proximity of new pitches) (figure 6). This building has potential to support bats as well as breeding birds.

The re-design of the campsite must reflect the woodland character of the site – avoiding adverse impacts on the semi-natural woodland habitat which is AWI listed. The habitats present should be used as a basis for designing locations of pitches, tracks etc. so that ecological impact is minimised. In particular the southern section, from the plans submitted, has potential to have a significant adverse impact on the woodland habitat surrounding the existing infrastructure. To reduce this impact, it is recommended that the number of pitches is reduced, and those impacting on high quality woodland habitat and wet woodland (e.g. figure 2, figure 4) are removed.

Landscape Impacts

Policy 5: Landscape of the LDP states that new development should conserve and enhance the landscape character and special qualities of the National Park. Policy 3: Sustainable Design also sets out design considerations that require to be taken account of.

The site lies within the Cairngorms Mountains National Scenic Area.

This area is characterised by diverse native pinewood with birch, juniper and rowan reflecting the small scale differences in sunlight, soils, levels and drainage. These landscape characteristics underpin the special landscape qualities that people experience here;

- Dark and venerable pine forest.
- Light and airy birch woods,
- extensive tracts of natural vegetation,
- attractive and contrasting textures
- long association with forestry

The site abuts the B970 and is adjacent to the Coylumbridge to Lairig Ghru core path. The path is well-used by walkers and cyclists and the wider area is criss-crossed by tracks and paths which are very popular for recreation. The caravan campsite is visible from the core path, but once past the campsite the woodland provides a secluded environment for the many people who visit.

The extension area to the site (for tourers) has been managed in the past as grazed woodland, and for overspill pitches. From a landscape perspective there is little difference between this area and the woodland to the south, apart from the presence of the derelict Lairig Ghru cottage and its former garden ground.

The proposal seeks to restructure the existing campsite in the north and utilise an area to the south of the existing active campsite for the purpose of touring pitches and the inclusion of a warden's caravan.

The area to the south has been used previously for touring pitches and already has a track and hard standing for pitches. However, additional pitches will be required as will a new track. In order to accommodate the space to manoeuvre, park and access camper vans/ caravans and towing vehicles, the infrastructure footprint (hard standings, access tracks, services) will require to be greater than is currently on the ground, possibly double. This will mean the loss of/damage to trees and understorey beyond what is indicated on the plans. A tree survey and accurately dimensioned plans are required to properly assess impacts.

The plans for the northern part of the site appear to combine both the existing situation and the proposed. Two separate plans would help to clarify the situation. A tree survey and accurately dimensioned plans are required to properly assess impacts.

The re-design of the campsite must reflect the woodland character of the site if it is to avoid impacting upon the special landscape qualities. As the special landscape qualities almost all relate to the qualities of the woodland the habitats present should be used as a basis for designing the locations of pitches, tracks etc. In the case of the southern part of the site it is advised that the number of pitches are reduced.

This is a popular part of the National Park and a NSA, development could have a significant local impact on the experience of special landscape qualities by people within and around the site. Further detail is required at planning application stage to determine the nature and extent of impacts and whether these can be addressed by mitigation.

Public Access

Policy 3: Sustainable Design of the LDP requires that new development maintains and maximises all opportunities for responsible outdoor access including links into the existing path network. All development requires to be consistent with the Core Paths Plan – the Rothiemurchus Blue route and Glenmore Off – Road route are both core paths. Consequently the relationship to core paths and the potential to further improve public access will require to be fully explored. If the site is expanded it presents an opportunity to improve the adjacent routes and make them more accessible to cyclists/horse riders/mobility scooters. This would benefit campers, residents and visitors also.

Amenity

Policy 3 Sustainable Design of the LDP requires that new development protect the amenity enjoyed by neighbours including minimisation of disturbance caused by access to the development site. In this regard potential noise issues will have to be fully considered and assessed as well as any issues relating to existing water supplies in the area. It is recommended that any neighbouring proprietors are kept informed of the proposals and their input actively sought.

Process

It is understood that this proposal will constitute a major application under the Scottish Government's hierarchy of development so appropriate pre application consultation with the community will require to be undertaken.

In addition the proposal will require to be screened to establish if Environmental Impact Assessment is required – the applicant will require to make such a request to the Highland Council who will consult with the Cairngorms National Park Authority (CNPA).

Any application would be submitted to the Highland Council for validation. Thereafter once valid, an application for this type and scale of development would be called in by the Cairngorms National Park Authority (CNPA) for determination as it constitutes a Type 1 development under our criteria for call in – more detail on this link:

<http://cairngorms.co.uk/wp-content/uploads/2016/02/151218PANApplyingForPlanningPermissionV22.pdf>

The CNPA would then offer a processing agreement setting out a timetable towards determination and identifying which Planning Committee it would be considered at. All applications determined by the CNPA are decided at Committee. The CNPA would welcome ongoing discussion on the proposals prior to submission of an application.

Conclusion

In order to fully consider any application we will need full supporting information as set out below. Submission of a *complete* package of information will help to facilitate swift processing, avoiding the need for re - consultation with other parties and importantly enable the public to comment fully. It will also avoid, in the event of the application being supported, the need for extensive use of "suspensive" planning conditions which would later hold up a start on site. Information set out below represents our initial assessment and we will of course be guided by the responses of consultees who it is expected will be seeking additional information.

Key Points	Assessments to be carried out and/or submitted with application
Detailed Plans	<p>All standard plans to be provided:</p> <ul style="list-style-type: none"> - location plan - site plan - scaled drawings of any engineering works including details of site sections and final levels - landscape plan
Ecological and Environmental Impacts	<p>As well as any baseline ecological information carried out to date (as indicated on the provided plans as target notes), the following is required as part of a future planning application:</p> <ul style="list-style-type: none"> - A full Arboricultural Impact Assessment detailing location of existing trees (including juniper) and a tree constraints plan. Only needed for the northern and southern sections, not needed for the camping area as this it is assumed that this area is not subject to change. Tree constraints plan to provide a realistic assessment of tree loss required for new pitches, widening of pitches, new tracks, infrastructure etc. - Detailed plans which show the layout of the whole site as existing, and plans to show proposed changes so that a comparison can be easily made and therefore an assessment of ecological impact. To include detailed designs for pitches, new roads and location of other infrastructure (electricity, water pipes, lighting etc.) so that habitat impacts can

	<p>be determined.</p> <ul style="list-style-type: none"> - Up to date species surveys for trees requiring removal i.e. red squirrel dreys and checks for bat potential - An up to date survey of wood ant nest locations and a Species Protection Plan detailing how nests will be protected during works. There are a couple of nests that come into conflict with touring pitch location and new track – translocation must be a last resort only but it could be that moving some nests is required to avoid disturbance during construction and operation. The SPP to include some interpretation to explain to guests about wood ant nests and not to disturb them. - An up to date bat survey of the derelict croft house, as well as checked for signs of breeding birds. - Scottish Natural Heritage will require to be consulted as to the potential for impacts on qualifying features of the adjoining Cairngorms SAC and River Spey SAC.
<p>Landscape Impacts</p>	<ul style="list-style-type: none"> - A full Arboricultural Impact Assessment detailing location of existing trees (including juniper) and a tree constraints plan. Only needed for the northern and southern sections, not needed for the camping area as this it is assumed that this area is not subject to change. Tree constraints plan to provide a realistic assessment of tree loss required for new pitches, widening of pitches, new tracks, infrastructure etc. - Detailed plans which show the layout of the whole site as existing, and separate plans to show proposed changes so that a proper assessment of impact can be made. To include detailed designs for pitches, new roads and location of other infrastructure (electricity, water pipes, lighting etc). - The above plans to include a 3m to 4m wide stock-fenced enclosure along the southern edge of the site. This will protect regenerating trees from browsing and disturbance and provide visual containment and a boundary to the site - Construction Method Statement detailing how the pitches and access and other

	<p>infrastructure will be constructed and how the site will be restored and reinstated including timescales</p> <ul style="list-style-type: none"> - A landscape maintenance plan describing ongoing site maintenance
Drainage Impacts	<p>Hydrology and Flooding Reports - SEPA and Highland Council flood team will advise on requirements for flood risk assessments. The information will also be used to inform the Habitats Regulations Appraisal”</p> <p>Drainage Impact Assessment, including information on foul and surface water drainage arrangements. This should reflect the need for SUDS to be used to maximise biodiversity and landscape enhancements. Information on maintenance to be included. Site drainage plan - existing and proposed- should also be included</p>
Construction methods and Management	<p>Construction Method Statement –a site specific document which demonstrates how the development will be implemented to take account of any environmental issues identified. This should also include phasing timing of works.</p>
Economic Impacts	<p>Economic Statement – to outline the requirement for the proposed expansion of the campsite and the economic benefits this will bring in terms of contributing to visitor experience and extending the core tourist season.</p>
Pre – Application Consultation with the Community(PAC)	<p>Pre Application Consultation Report as required by Scottish Government legislation explaining how the public consultation process has informed development of the proposal and the measures taken to inform the public. It is also recommended that (aside from the neighbour notification process which will be carried out by the Highland Council), the developer advise residents in the area of the submission of the application in the interests of good practise and public relations as it is our experience that this type of proactive work is usually beneficial.</p>

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Please attach any additional information as a separate file and send to
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