

Badenoch & Strathspey Conservation Group
STATEMENT OF EVIDENCE
Hearing Session

Provision of the Local Plan

Grantown HI

Summary of objection(s)

The allocation conflicts with the aims of the NP.

The site is an important feeding and breeding area for waders (including snipe, oystercatcher, lapwing, redshank and curlew). Strathspey is recognised as of particular importance for waders, of which this site is a component part.

The site supports a rich assemblage of plants. This includes at least 2 red listed vascular plants. It supports an exceptionally large and therefore important population of Field gentian. This is the largest population of this highly attractive flower, which has declined dramatically in the UK in recent years, that we have recorded in the strath.

The site supports an important assemblage of waxcap (*Hygrocybe*) fungi and supports other fungi of interest.

All the above are examples of conflict with the 1st, 3rd and 4th aims.

The site contributes extremely positively to the landscape setting of Grantown.

It provides an important public amenity. It provides exceptionally attractive and varied walking and other access opportunities and links in well to other walks promoted in the town.

The above are examples of conflict with the 1st, 3rd and 4th aims.

The scale of this proposal is excessive.

Research has demonstrated the health benefits of the sights and sounds of the countryside on patients.

This is a significant aspect of the benefit of the location of the hospital. To urbanise the surroundings of the hospital is to reduce the quality of life for patients. (Conflict with 3rd aim).

The site is very unusual within the CNP and the wider area in general, owing to the influence of base-rich rock coupled with the local topography. There are several UK priority species of invertebrates and other rare invertebrates recently recorded using the site. (conflicts with 1st, 3rd and 4th aims)

Recommendation.

Omit allocation from LP

We recommend part of the site should be recognised by the CNPA as a 2nd tier site.

Northern Newsletter 25, 2009. New Scottish Record for Grantown, and Refuges – answer to caper calamity?
Scottish Wildlife Trust.

Additional Statement

The impact on Anagach Wood SPA has not been properly determined. Recreational disturbance is known to impact on capercaillie in Anagach, as a result of recent field research (Moss 2008). This is new evidence.

It is not credible to suggest that an allocation of this scale in this part of Grantown would not increase recreational use of Anagach.

We welcome that the natural heritage importance of the Mossie is now recognised by the CNPA in the light of new information, and that, on the present information, they consider the most significant natural heritage of the site are the breeding waders, the associated grassland and mire habitats and invertebrate communities. The CNPA has established that in their view there is conflict between the 1st and 4th aims, and therefore, according to the legislation, the 1st aim takes precedence.

We contend that this process must occur at the LP stage, not at the stage of determining an application. For the CNPA to approve an allocation knowing that it is in conflict with the 1st aim, and knowing that the reasons for that conflict are extensive rather than localised, and in addition, are by no means fully known, appears to be at odds with what the NP was set up to achieve.

The wader interest requires an extensive habitat, the true extent and locations of the invertebrate interest are simply unknown, the grassland and mire habitats are widespread on HI, the plants and fungi of conservation importance are widespread on the site and by no means fully known, and so on.

In addition, maintaining a grazing regime on the grassland is important to sustaining its biodiversity importance and special qualities. It is very questionable whether an appropriate grazing regime could be viable if a large part of the proposed allocation is to be developed for housing.

Long established, unimproved grazed meadow is a habitat that the CNPA recognises of particular importance (e.g. see the CNPA Inbye vegetation report). It is a habitat that has declined in Badenoch & Strathspey, as elsewhere, with changes in agricultural practices.

Bob Loughton of the Spey Fisheries Board has advised the CNPA (email 3.10.08) that "The Burn is a particularly good one for trout both sea trout and brown trout are present and surprisingly good numbers of juveniles are also present. Salmon do also use it on occasion. The lampreys are brook lamprey which are common in the middle Spey... The burn has seen a lot of development of (sic) the years including rechanneling ... The additional 200 houses could have potential further effects on the watercourse and I think we would like to review this further with respect to mitigation measures".

The hydrological regime on the site is a crucial part of maintaining the important habitats and species. The site depends on a fluctuating, high water table. The surface water recharge on developed land would be lost permanently; the impact of this loss is simply unknown. SEPA have provided written advice to the CNPA (19.11.08) regarding a live application on this allocation site. We appreciate that the LP process is separate from this. However, we consider that SEPA's informative advice is pertinent to the LP allocation decision.

SEPA states that (points 11 and 12) "SEPA is therefore aware that development of this site, including the SUDS proposals, will impact on the existing moss area in terms of its current water levels and this may have impacts on the existing flora and fauna....By including the existing moss in the surface water drainage system it is clear that the current SUDS proposals will impact on the existing moss and this is contrary to SEPA guidance".

The SEPA SUDS leaflet (available on SEPA website) states as the first 'Don't "Don't use existing ponds, wetlands or ditches for SUDS treatment". It is unclear what the options are for developing the allocation without SUDS impacting on the moss area.

Clarity for all parties concerned is important in reducing conflict. We appreciate that the CNPA is considering that not all the allocation could be available for built development. But nevertheless, if they are to retain such a

large allocation in the LP then presumably they are considering that a large part of it will be developed. Otherwise, what is the purpose of retaining such a large allocation?

We consider that it is unrealistic to propose that a housing development could go ahead without major impacts on important natural heritage that would constitute conflict with the 1st aim.