



Agenda item 4

Appendix 5b

2025/0034/DET

Representations - objections

From: Cairngorms Campaign [REDACTED]
Sent: 24 March 2025 23:22
To: Planning
Cc: Katherine Donnachie
Subject: CNPA planning application Ref 25/0034/DET

Categories: Emma G, Comments

Cairngorms Campaign
Scottish Charity SC05523

CNPA planning application Ref 25/0034/DET

Dear Sir/Madam

The Campaign is writing to object to the above application.

Grounds for our objection include the following concerns:

1. This proposal significantly exceeds the allocation in the recent local plan, both for the number of houses and the land take.
2. The proposal would reduce the connectivity of a vital wildlife corridor between the designated sites of Craigmore and Abernethy Forest. Facilitating movement of Capercaillie between these two SPAs is vital to maintaining a viable future for this endangered bird.
3. The proposal conflicts with both the 1st and 4th aims of the NP. It depletes the stock of agricultural land with implications for future generations.
4. The proposal to segregate the affordable housing rather than integrate a mix of house types is damaging to the character and social cohesion of the settlement and out of line with accepted good place-making. These considerations should take precedence over profit maximisation for the developer.
5. The design has been recognized as uninspiring and inappropriate given especially the context of outstanding and exceptional views that stand to be degraded.
6. It destroys an open view degrading the experience on a much-appreciated walk/cycle promoted route. The landscape asset it impacts contributes to the tourist economy and provides inspiration to visitors and residents.
7. It is too close to sensitive riparian woodland, impacting important biodiversity, including species associated with the River Spey SAC.
8. It appears that the SUDS proposals are not of sufficient scale. There is also a risk that some garden ground could be subject to periodic flooding.
9. The development would create light pollution impacts. These are potentially particularly damaging when impinging on freshwater habitats.
10. Species on the Scottish Biodiversity List for which the Cairngorms is important are liable to be adversely impacted.
11. We are not satisfied that adequate account has been taken of the potential impact on otters. Distributional information is provided by signs (tracks, droppings), but these do not provide information on the number of individuals. Therefore, the size of the population associated with the River Spey remains unknown. This at a time when there is reduction in important otter prey, such as salmon and eels.

12. We note some planting is proposed in strips, but do not consider realistic assessment can rate these as generous enough to be effective.
13. We consider that the proposal, particularly because of its location and scale, conflicts with NPF4 policy 3 (Biodiversity).
14. We do not see this proposal as climate friendly or affordable.

Yours sincerely

A solid black rectangular box used to redact the signature of Keith Charman.

Keith Charman

Director

The Dulaig
Seafield Avenue
Grantown-on-Spey
PH26 3JG

24 March 2025

Cairngorms National Park Authority
Planning Team
14 The Square
Grantown on Spey
PH26 3HG

Objection to Planning Application 2025/0034/DET - Residential development of 35no. units, formation of access road and SUDS – Land 160m South of Lynstock Park, Nethy Bridge

I have certain objections to this planning application in its current form and layout.

1. SUDS Pond.

The Drainage Statement calculates the required size of the pond to be 190m³. I have two concerns about the SUDS pond being undersized for this development.

- The SUDS pond is stated to be of a depth of 1.5m. From the topographical plan, it would appear that the base of this SUDS pond is close to the levels of the River Nethy. There appears to be the potential for groundwater ingress into the SUDS pond, especially during periods of sustained higher rainfall. I do not see any recognition of this potential for groundwater ingress into the SUDS pond in the capacity calculations. Without accounting for ingress of groundwater especially during periods of high rainfall, it is likely that the SUDS pond could be significantly undersized.

- The SUDS pond is only sized for a 30 year + climate change storm event. This was noted by Highland Council's Flood Team. The Flood Team said they would welcome 'betterment' of the SUDS pond size as there are known flood risk issues downstream. I wouldn't term this request 'betterment', instead I maintain that if this SUDS pond is not increased in size significantly above the 30 year + climate change storm event, then this development (if it were to proceed) would consequently increase the downstream flood risk. Furthermore, I believe to not increase the SUDS pond capacity to ensure no contribution to flood risk areas downstream would be a breach of NPF4, and I quote, *"To strengthen resilience to flood risk by promoting avoidance as a first principle and reducing the vulnerability of existing and future development to flooding"*.

Taking these issues together, if this development is to proceed, then the SUDS pond capacity requirement needs to be recalculated to compensate for these two issues. Furthermore, it is unsatisfactory for these important issues to be downrated to a

planning condition requiring these risks to be assessed in a Drainage Impact Assessment. They are of significant importance for these issues to be addressed before this application goes to Committee, or before full approval of the application is granted.

I have one further concern this time regarding the siting of the SUDS pond. According to the Flood Risk Assessment report, the SUDS pond lies well within the 1 in 200 year flood risk area, and since there does not appear to be any embankments proposed around the SUDS pond, in the event of a fluvial flood (from the River Nethy) overtopping the SUDS pond, the purpose and operation of the SUDS pond would be negated.

2. Flood Risk

The Envirocentre Flood Risk Assessment shows the areas of the development which have a greater risk than 1 in 200 years + climate change adjustment of flooding see plan below.



This flood risk area is very close to the proposed built development and shows that the actual houses in plots 9 and 10 are on the edge of this 1 in 200 year flood risk. Even

SEPA noted that in plots 9 and 10, their gardens are within the flood risk area. Furthermore, the sensitivity analysis output predicts a greater potential flood area which would additionally affect plots 8 and 11.

Given the limitations of the accuracy of the modelling used for the flood risk assessment, I believe the viability of plots 8, 9 10 and 11 is very questionable. I also believe that NPF4 in its commentary on flood risk supports my assertion.

3. Landscape

I note that the valid comments made by CNPA's Landscape consultant during the pre-application discussions seem to have been ignored. I quote from her response to this application, *"Housing units 12-16 are likely to be more visually prominent due to their elevated position and it would have been better to have omitted these units in favour of planting woodland to reinforce the knoll lying to the south-east of the development site"*.

I fully concur with her comments and believe these plots should be removed from the application.

Taken in conjunction with my concerns over the flood risk to plots 8-11, if all 9 plots were removed from the application, the wildlife corridor along the banks of the River Nethy would be much wider and much more environmentally sustainable.

4. Conflict with the LDP H1 site size.

The current CNPA LDP site size is much smaller than the proposed built development in this application and the number of houses has grown from around 20 to 35 houses.



This overlay of the LDP site size (in pink) clearly demonstrates the very significant expansion of this development. I have read all the justifications put forward for increasing the development size, but remain unconvinced of the need for such expansion and remain concerned about the reduction in wildlife corridor near the river and of the visual impact of the development on the edge of the village. Such a major expansion to the proposed development in the LDP, calls into question the validity of the LDP. Is it in place for strong guidance to shape future developments, or something that can be altered at will or whim?

I propose a possible compromise on the extent of the 'hard' development area compared with the LDP area.

- remove plots 8, 9, 10 and 11 on the basis of these plots being on the margins of flood risk
- remove plots 12, 13, 14, 15, 16 on the basis of the CNPA's Landscape consultant's recommendation
- additionally the removal of these 8 plots would greatly improve the visual landscape character and provide a much improved landscape setting, and much improved wildlife corridor along the bank of the River Nethy.

The resulting 26 plot development would still be slightly larger than the LDP proposed site, but much more in keeping with the original intention of including this 20 house development in the LDP.

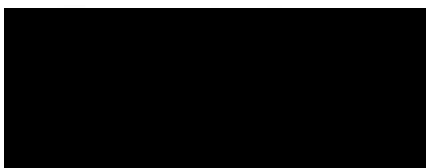
5. House Design

In line with the comments of the CNPA's Landscape consultant, I am concerned that the outside design of the proposed housing doesn't live up to the LDP words which require, housing of the highest quality design and Policy 1 states that housing proposals will be supported where they reinforce and enhance the character of the settlement. However, I note in the Design & Access Statement that the architect is implying that these designs are indicative only. Consequently, I assume that detailed design of the individual houses will be the subject of supplementary applications, or alternatively agreed under appropriate planning conditions.

I urge CNPA to use what influence and processes it has to improve these designs to be less suburban in nature and have more local character.

I hope my comments will be seriously considered and assessed and appropriately presented in the Planning Officer's report, and not as happens too frequently just presented in a summary list of objections.

Yours faithfully,



**Roy Turnbull
Torniscar
Nethy Bridge
Inverness-shire PH25 3ED
Scotland
Tel. [REDACTED]
Email: [REDACTED]**

Katherine Donnachie,
CNPA Case Officer

23th March 2025

Dear CNPA Case Officer,

2025/0034/DET | Residential development of 35no. units, formation of access road and SUDS

I **object** to the above planning application for the following reason:

The above planning application is not in accordance with the Development Plan.

The Development Plan comprises both the National Planning Framework (NPF4) and the Local Development Plan (LDP). Scottish Government policy states that decisions on planning applications are legally required to be made in accordance with the Development Plan unless there are material considerations that indicate otherwise.

In this case, the LDP allocated

- i) land at H1 on a site whose area is substantially smaller than the present application site, and
- ii) for 20 dwellings rather than the 35 dwellings applied for, an increase of 75%.

The applicant briefly addresses these substantial departures from the Development Plan in the Design and Access Statement, in the following terms:

"a strong argument for extending the current site designation could be made in the interests of achieving a coherent development" and that "there is no particular bar on numbers achievable on the site". In addition, the applicant claims that these substantial enlargements would "improve efficiency of the layout by increasing the number of units" and that "Spreading the site infrastructure works across more units will help improve affordability to fulfil local housing need."

Whatever the merits or demerits of those assertions, the fact remains that they did NOT result in an extended site designation, nor for the provision for 35 dwellings, in the LDP. Thus, this application is indubitably not in accordance with the Development Plan, and, indeed, diverges from it to a substantial extent.

Whilst it may be acceptable to change the shape of a development area somewhat in the final design, if, and only if, the material considerations proposed do not impact on considerations of biodiversity, landscape, and amenity, that should not be used to substantially **increase** the development area, as is proposed in this case. In this case, the expanded area now proposed brings housing development within a few metres of the River Nethy, part of the River Spey Special Area of Conservation, which should be unacceptable.

Moreover, the proposal to increase the number of dwellings in the interest of "improved efficiency" not only results in the north west boundary of housing development being too close to the existing dwellings, but produces a far more suburban character of development than is appropriate in this location. It is arguable that the Nethy Bridge settlement boundary should never have been extended

further south east beyond the existing housing. However, it is accepted that that is what the LDP allowed for. But that should not now result in a greatly increased number of dwellings simply to increase the "efficiency", (and financial viability), of the proposal. The applicant's reason for proposing this increase in dwellings might have merit in an infill development in an urban or suburban situation, but not in an extension on the fringe of a rural settlement in a landscape and biodiversity sensitive location in a national park.

The CNPA rightly strives to encourage stakeholder participation during the consultations on the Local Development Plan. That is admittedly a difficult process, attempting to reconcile frequently conflicting views on what is acceptable. But if that process of producing the LDP is then shown to be of little worth, if the result is seen to be disregarded in favour of developers' interests, and what appear to be legal requirements are ignored, then can it be any wonder if the public confidence in such consultations grows to be the opposite of what the CNPA might wish?

Yours sincerely,



Comments for Planning Application 2025/0034/DET

Application Summary

Application Number: 2025/0034/DET

Address: Land 160M South Of Lynstock Park Nethy Bridge

Proposal: Residential development of 35no. units, formation of access road and SUDS

Case Officer: Katherine Donnachie

Customer Details

Name: Mr Stewart Taylor

Address: Firwood Nethy Bridge PH25 3DE

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: In Carol Anderson's Response Form a more sensible number of houses is raised ie "The site has capacity for 20 dwellings" as per the current CNPA Local Development Plan. The number of houses applied for goes against what is typical of this part of Nethy Bridge with several croft-type houses along the road to the SE of the site.

Whilst there should be 25% affordable it is quite difficult to know how many local people will be able to afford the other houses and how many might become holiday homes.

Will the extra number of people, dogs etc be considered regarding the increased impact on the surrounding woodland etc especially with this area being part of the woodland link between RSPB Abernethy and RSPB Craigmore wood regarding Capercaillie. Thinking of birds, has a breeding/wintering bird survey been done for this location? In fact, most of what seems to appear in the "20 Feb 2025 Supporting information NATURAL HERITAGE DESK STUDY" relies on information about species found by other people.

Whilst there appears to be few records for the actual development site (only brown hare), areas of land totally adjacent to the site support many important species, particularly fungi and flowers. The knoll adjacent to houses 12, 13, 14, 15 and 16 is close to being of national importance for the range of fungi it supports particularly waxcap fungi with 12 species recorded to date. Several plants are also key species particularly for the number of insect species they support; bird's-foot trefoil, rockrose, devil's-bit scabious and yellow rattle to name but a few. Two orchid species have also been recorded heath spotted and heath fragrant orchid with over 300 of the latter. With the right level of grazing management more fungi are likely to be recorded but this would take recording visits over several growing seasons. Houses away from this area should be important - hence a maximum of 20 houses would be key.

2025/0034/DET

Residential development of 35no. units, formation of access road and SUDS
Land 160M South of Lynstock Park Nethy Bridge

Comment as sent to via the CNPA Planning website with some additions for your information.

In Carol Anderson's Response Form a more sensible number of houses is raised ie "The site has capacity for 20 dwellings" as per the current CNPA Local Development Plan. The number of houses applied for goes against what is typical of this part of Nethy Bridge with several croft-type houses along the road to the SE of the site.

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An addition following contact with local Mycological expert Liz Holden about the number of important waxcap fungi on the knoll that could be affected by this planning application should the residential development go ahead.

Three species of importance out of the twelve species identified on the knoll by the proposed development are:

Neohygrocybe ovina, *Hygrocybe punicea* and *Hygrocybe splendidissima*.

These three species alone suggest a proper, full survey of the knoll site should be undertaken before any planning permission is given and consideration given about allowing houses to be built so close to the knoll.

Stewart Taylor

Firwood, Nethy Bridge, PH25 3DE.

Comments for Planning Application 2025/0034/DET

Application Summary

Application Number: 2025/0034/DET

Address: Land 160M South Of Lynstock Park Nethy Bridge

Proposal: Residential development of 35no. units, formation of access road and SUDS

Case Officer: Katherine Donnachie

Customer Details

Name: Sorrel Jones

Address: 37 lynstock crescent Nethybridge PH253DX

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: This application is not compliant with the Local Development Plan. The proposed allocation of affordable housing is all at a different site, which lack of integration will do nothing to strengthen the community. Furthermore, their size and design indicates they are not genuinely affordable. The local development plan highlights that terraced housing in the style of Lynstock crescent is desirable. Such a development would be far more valuable to the community.

The application for 35 houses also greatly exceeds the number of houses in the local development plan (20). This excessive increase will exacerbate the ecological damage from the development, especially due to bringing the development area in close proximity to the River Nethy. It seems clear that a more appropriate development would include properly affordable housing, and be constrained to the top field.

Emma Greenlees

From: BSCG info [REDACTED]
Sent: 24 March 2025 23:44
To: Planning; Katherine Donnachie
Subject: BSCG Comments 25-0034

Categories: Emma G, Comments

Badenoch & Strathspey Conservation Group

Fiodhag, Nethybridge, Inverness-shire PH25 3DJ

Tel [REDACTED]

Scottish Charity No. SC003846

Email [REDACTED]

Website bscg.org.uk/

CNPA Planning

24 March 2025

Dear Katherine Donnachy

25/0035/DET Residential
development of 35no. units, formation of access road and SUDS

Land 160M South Of Lynstock Park Nethy Bridge

I am writing to object to the above application and I would like to request the opportunity to address the committee when the application is determined.

Not compliant with the CNPA Local Development Plan 2021.

The LDP states "The site has capacity for 20 dwellings". The 35 dwellings proposed represents an increase of 75%.

The area allocated in the LDP is very substantially smaller than the area of the proposal. The area of the proposal within the red line boundary represents an increase of approximately 410% above the allocated area in the LDP; and if the undeveloped ground near the river is excluded, then the increase is approximately 320% compared to the area of the H1 allocation in the LDP.

This level of non-compliance is unacceptable. To permit such an uplift in house numbers and land take would draw into question the validity and the purpose of the LDP. It would also undermine public confidence in the planning system and the worth of engaging with the consultation process of the LDP.

Landscape

The proposal would have significant impacts on the landscape of an extremely attractive area, and on outstanding views to the Cairngorms that are truly exceptional.

The LDP states that the “detail of any development must take account of and seek to complement ... the views towards the Cairngorms, and the nature of nearby development” and that “the site will need to take account of and respond to the wider landscape context, particularly views towards the Cairngorm plateau”.

We do not see that this proposal has in any way taken account of, or responded to the outstanding quality of this setting.

Recreational Enjoyment

The Lettoch Road is part of the popular, well used, promoted path network of Nethybridge and the proposal would significantly reduce the quality of experience for users.

House Designs and Layout

We agree with the Landscape Advisor's comments, that the proposal has a “suburban character” that is out of place in this setting, and the house designs are “uninspiring.” We do not consider that this meets the LDP requirements of “the highest quality of design”; and neither would it “reinforce and enhance the character of the settlement”.

The Landscape Adviser states that Houses 12-16, which are elevated and therefore likely to be more prominent in the landscape, should be removed from the proposal. We agree that these houses should be removed given the landscape impacts. In addition, we consider they should be removed due to impacts on biodiversity that are considered later.

In relation to house types and design, the LDP states that “semi-detached and terraced dwellings , in a similar pattern to Lynstock Crescent are desirable.” This guidance, which implies modest houses and a higher housing density, has not been followed. Consequently, the proposed houses are unlikely to match the needs of many people working in the local economy.

We do not support segregating the housing so that all the 'affordable' housing is at the Old Station site and there is no provision of affordable housing at the Lettoch Road site. We don't believe such segregation is community-friendly, nor that it delivers good place-making.

SUDS

At a time of climate emergency, we believe a precautionary approach towards SUDS is imperative. We consider it is unacceptable that the gardens of houses 9 and 10 are within the flood risk area; and that the houses of these two plots are on the edge of the 1 in 200 years + climate change adjustment flood risk. We note that the sensitivity analysis predicts a greater potential flood area that would also affect plots 8 and 11.

Further, the SUDS pond capacity should be more than the current 30 year + climate change storm event. There are known flood risk issues downstream, and without a larger SUDS the proposed development could add to the downstream flood risk. We consider the present SUDS proposals do not comply with the 4th aim of the NP that requires development to be “sustainable”. The proposals similarly conflict with NPF4 which states on flooding that “promoting avoidance” is a first principle, and emphasises “reducing the vulnerability of existing and future development to flooding”.

Biodiversity Impacts

The proposal site forms part of the habitat connectivity in a key corridor between Craigmore and Abernethy. Both these sites are designated for Capercaillie and movement between the two is necessary for the Strathspey metapopulation of Capercaillie. The proposals would degrade the connectivity as well as add to recreational disturbance in the corridor (from walkers, dogs, cyclists, runners, etc), including in the woodland directly across Lettoch Road from the development.

A Selection of Species Recorded within the Red Line Boundary of the Proposal Site and very close by.

Invertebrates

Raft Spider *Dolomedes fimbriatus*, Nationally Scarce.

In the south west of the site, within the red line boundary but outwith the part of the site proposed to be developed, there is a damp area where in wet conditions there can be standing water, that is contributed to by a field drain that issues into this area from the field further uphill.

Here we have recorded the rare Raft Spider *Dolomedes fimbriatus* that is classed as Nationally Scarce. This spider is closely associated with water. It is breeding at this location, with a nursery web containing many spiderlings and guarded by the adult female, having been found here in 2024.

A feature of this breeding location is extreme vulnerability to trampling.

Small Scabious Mining Bee *Andrena marginata*. On the Scottish Biodiversity List and recorded within the red line boundary. This rare bee is associated with the flower Devil's-bit Scabious, which occurs at many locations within the proposal site. One of this bee's few UK strongholds is in the Cairngorms. It is a particularly important pollinator of Devil's-bit Scabious. It is one of the target species of the Rare Invertebrates in the Cairngorms project. The CNPA writes of this bee "Listed as endangered in 7 other European countries, this mining bee is an internationally important part of the Park's brilliant insect biodiversity. It ... is closely associated with its only known pollen source recorded in Scotland, Devil's-bit Scabious."

Tormentil Mining Bee *Andrena tarsata*. On the Scottish Biodiversity List and recorded within the red line boundary. It typically visits Tormentil flowers for which it has a strong preference for pollen. Will also visit Harebells and some other flowers, possibly only for nectar, not for pollen.

Narrow-bordered Bee Hawk-moth (*Hemaris tityus*). On the Scottish Biodiversity List and classed as Nationally Scarce. It is recorded within the red line boundary and is also associated with Devil's-bit Scabious.

Pinewood Mason Bee *Osmia uncinata*. On the Scottish Biodiversity List and is a species of Conservation Concern. It is recorded close to the proposal site and is likely to feed on its food plant Bird's-foot Trefoil on the proposal site and on the Knoll. The rare Pinewood Mason Bee is recorded feeding on Bird's-foot Trefoil flowers on the northern side of the Lettoch Road a few metres from the proposal red line boundary.

Furry Peat Hoverfly *Sericomyia superbiens* recorded within the red line boundary. Visits flowers of Devil's-bit Scabious.

Bog Hoverfly *Sericomya silentis* recorded from within the red line boundary.

Fungi

Crimson Waxcap *Hygrocybe punicea* is recorded from various parts of the site near the edge of the development footprint. Most, or perhaps all of these areas, will be directly impacted by development. Within the CNP in recent years, there have been cumulative impacts with loss of sites for this fungus, including at Carrbridge, Aviemore and Kincaig.

Birds

Curlew UK Red List of Birds of Conservation Concern (BoCC). Feed on the proposal field.

Oystercatcher UK Amber List. Known to breed successfully in the field in recent years.

Woodcock UK Red List. Benefit from good cover, which may be denuded depending on management; wintering birds using dense and relatively frost-free habitat near the river where the ground remains unfrozen, may be impacted by disturbance from dogs and people. May lose undisturbed daytime refuge sites.

Dipper UK Amber List. Breed nearby, and forage in the River Nethy. Could be impacted by habitat degradation and loss in the riparian zone depending on management practices; increased disturbance

pressures from people and pets; from artificial lighting affecting their prey e.g. adult river flies; young birds can be especially vulnerable when they have left the nest but are still dependent on an adult.

Cuckoos UK Red List. Use the site for foraging. May be impacted by their hosts, such as Meadow Pipits, losing habitat.

Meadow Pipits UK Amber List. Known to use parts of the site. Will lose habitat to development.

Thrushes including Song Thrush, Mistle Thrush, Fieldfare All UK Red List. All use the grassland for foraging.

White-tailed Eagle UK Amber List. There is an anecdotal report of a sea eagle taking a brown hare from this site.

Kestrel UK Amber List. Will lose foraging habitat.

Mammals

Brown Hare On Scottish Biodiversity List. Can make considerable use of the site and have been seen at high densities in some years. Several females believed to have bred on the site in some years.

Pine Marten On Scottish Biodiversity List. Considered to use the site.

Otter On Scottish Biodiversity List. Otters using the area can be considered to be part of the River Spey SAC population. Two fresh spraint locations in the stretch of the R. Nethy alongside the proposal site, March 2025.

Known to use the riparian area. There is an anecdotal report of an otter seen crossing the Lettoch Road, suggesting use of the habitat corridor between the River Nethy and the burns and ponds in School Wood and Culstank.

Wildcat Potential Wildcat habitat supporting prey (such as small mammals and birds) and providing cover, will be lost and degraded. There are potential impacts from domestic cats due to inter breeding, disease and competition for wild prey.

Badger Will lose habitat.

Proximity of Houses to the River Nethy

Some proposed houses and gardens (house numbers 11, 12, 13) are sited considerably too close to the River Nethy, where they would impact the very important habitat of the steep wooded slope of the river bank. Impacts include lighting from house lights and garden lighting; garden waste including lawn mowings being disposed of over the garden fence; garden plants spreading into valuable riparian vegetation; dogs being let out of the garden and impacting both on the banks and the river itself; people scrambling up and down the steep banks; the creation of dens; the erection of zip wires. The value of riparian habitats is high. Space should be provided to expand and enhance the riparian zone. As proposed, the development would constrain it.

Proximity of Houses to the Knoll

The Knoll is the elevated area that is outwith the proposal site but directly adjacent to the red line boundary, on the east side. House numbers 13-16 are sited significantly too close to the Knoll, where they would impact the very high quality habitat of this area.

It is an exceptional area that benefits from being both long established and unimproved. It is extremely vulnerable to degradation due to the proximity of houses and gardens as proposed. Impacts from the proximity of houses would be likely to include dumping of lawn mowings and other garden waste over the garden fence onto the Knoll; the spread and possible intentional planting of garden plants onto the Knoll; the effects of cat and dog mess on the soils, fungi and flora; increased trampling pressure; lighting from houses and gardens impacting night flying species of insects which include important pollinators.

The CNPA has plans and targets in place to prioritise the conservation of long established flower- and fungi-rich sites, and is spending staff time on seeking to achieve this. The Knoll is a rich and important example of such a site.

12 species of waxcaps have been recorded from the Knoll. These include the rare Blushing Waxcap *Neohygrocybe ovina* (found in two locations, with 12 individual and 6 individual fruiting bodies); and Crimson Waxcap *H. punicea* recorded from multiple locations on the Knoll as well as within the red line boundary. Both these species are on the Provisional European Red List (PERL).

The other waxcap species recorded on the Knoll are:

Hygrocybe chlorophana

H. laeta

H. russocoriacea

H. conica

H. coccinea

H. reidii

H. splendidissima

H. cantharellus

H. ceracea

H. virginea

The CNPA CNAP states that a “good site” may contain 12-20 species of waxcaps. The Knoll is already known to contain 12 species, making it a good site, and this number may well be added to with the fruiting bodies of other waxcap species appearing in other years.

Nationally important site for grassland fungi. How many species.

In 2024 there were 50 fruiting bodies of the fungus Morel (*Morchella elata*) on the Knoll; and some 390 flowering spikes of Heath Fragrant Orchid (*Gymnadenia borealis*).

The following 15 species are a selection of the over 50 flowering plant species recorded from the Knoll, with notes for some species:

Alpine Bistort *Persicaria vivipara* There is potential for the rarely recorded fungus (*Microbotryum bistortarum*) that grows on Alpine Bistort to occur here.

Common Bird's-foot Trefoil *Lotus corniculatus*. This is the food plant for the rare Pinewood Mason Bee (*Osmia uncinata*) that is recorded feeding on Bird's-foot Trefoil on the northern side of the Lettoch Road a few metres from the proposal red line boundary. It may well breed nearby and is likely to feed on the Knoll.

Common Bird's-foot Trefoil is an important food plant for the 6-spot Burnet moth, which has been recorded within a few metres of the proposal site red line boundary.

Common Bird's-foot Trefoil is also the usual food plant for the scarce Dingy Skipper butterfly (*Erynnis tages*), that has not as yet been recorded here.

Common Rock Rose *Helianthemum nummularium*. This is the food plant for the rare butterfly Northern Brown Argus (as yet unrecorded on the Knoll).

Creeping Willow *Salix repens*

Devil's-bit Scabious *Succisa pratensis*. This is also present within the red line boundary. This is an important food plant for many species including the Small Scabious Mining Bee (*Andrena marginata*) and the Narrow-bordered Bee Hawk-moth (*Hemaris tityus*). Both these insects have been recorded on the proposal site within the red line boundary. Another rarity associated with Devil's-bit Scabious that has not as yet been recorded at this location is Scarce Scabious Clubhorn Sawfly *Abia candens*.

Fairy Flax *Linum catharticum*

Goldenrod *Solidago virgaurea*

Harebell *Campanula rotundifolia*

Heath Milkwort *Polygala serpyllifolia*

Lousewort *Pedicularis sylvatica*

Pill Sedge *Carex pillulifera*

Slender St John's Wort *Hypericum pulchrum*

Wild Thyme *Thymus polytrichous*

Yellow Rattle *Rhinanthus minor*. Important as a hemi-parasite in sustaining the richness of the site.

Yours sincerely

Gus Jones

Convener