

# **Agenda Item 6**

## **Appendix 4**

**2023/0380/DET**

**Representations - objection**

## Emma Greenlees

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**From:** [REDACTED]  
**Sent:** 30 October 2023 23:53  
**To:** Planning; Emma Bryce  
**Subject:** 2023/0380/DET comments  
**Categories:** Emma G, Request to Speak, Comments

[REDACTED]

[REDACTED]

[REDACTED]

Emma Bryce

CNPA Planning

30 October 2023

Dear Emma Bryce

2023/0380/DET | Extension to caravan site with 16No. static holiday caravans | Grantown-On-Spey Caravan And Motorhome Club Seafield Avenue Grantown-On-Spey PH26 3JQ

I am writing to object to the above application. I would like to request the opportunity to address the planning committee when they meet to determine this application.

Landscape

Extending the caravan site will impact the formerly relatively natural landscape with additional roadways, static caravans, and associated infrastructure. A number of mature native trees have already been compromised to the detriment of landscape quality in this general part of the caravan site.

The proposal site is visible from various locations, including where there are long established access routes. These include:

To the south east of the proposal, from the path that runs from Seafield Avenue past Lynemore Care Home (and is joined by the path from beside Inverallan Church) and continues north east at the woodland edge by the Meadow Burn to open ground on the Mossie.

North east of the proposal, from the various paths and open ground of the Mossie.

North west of the proposal, from the top of the railway line embankment. The railway line at this point forms part of the promoted Dava Way, for which viewpoints are of course important.

North of the proposal, from the paths within the mainly conifer woodland near the woodland edge.

There are cumulative impacts on landscape in this part of Grantown with in particular the nearby Beachen Court development, as well as the Care Home.

## Habitats

The variety and richness of wet and dry grassland, fen and woodland habitats on the Mossie is exceptional.

The recent work that has stripped the field beside the caravan site of vegetation, and re-profiled the field, apparently in order to extend the caravan site into this area, is a very significant loss to the habitats and biodiversity of the Mossie.

In the CNPA report *"2009 CNPA Supplementary Habitat Information GS/H1, 2008 CNPA HLM Survey Information GS/H1, Summary of Biodiversity Data"* the most important habitats on the Mossie are considered to be the calcareous and unimproved grassland habitats. In the CNPA's In-Bye survey, there were few other fields with so much species rich grassland, and the Mossie was in the top 40 (of 1340) sites surveyed in terms of vegetation richness and species diversity, with less than 4% of the sites surveyed being as species rich as the Mossie.

The CNPA Report refers to the species rich grassland and fen between the caravan site and the birch wood, which is directly adjacent to the proposal site.

## Biodiversity

The Mossie has supported a rich and exceptional biodiversity. However, this cannot be taken for granted and there is evidence that its rich assemblage of species has declined significantly in recent years.

Thus, for example, the large population of hundreds of Field Gentian present some 15 years ago has declined to almost nothing; and similarly, the 12 species of waxcap fungi recorded then, now amount to about two species.

The Mossie as a whole is subject to a variety of influences, including grazing and trampling pressures from horses and cattle, and application of fertilizer, which are outwith the control of the CNPA. However, planning and access are within the CNPA's determination.

Waders: The Cairngorms Straths have long been appreciated as of national importance for breeding waders. The following waders have all been known from the Mossie, but their numbers have declined significantly at the Mossie over recent years: Redshank (UK Amber List, UK population and distribution declining); Curlew (UK Red List, UK population and distribution declining); Snipe (UK Amber List, UK population stable, distribution declining); Lapwing (UK Red List, UK population and distribution declining); and Oystercatcher (UK Amber List, UK population declining, distribution expanding).

As explained in the “2009 CNPA Supplementary Habitat Information GS/H1, 2008 CNPA HLM Survey Information GS/H1, Summary of Biodiversity Data” the Mossie was then “critical to breeding waders.” At that time the Mossie supported important numbers of breeding Lapwing; and Curlew, Snipe, Redshank and Oystercatcher all bred on the Mossie. During 2008, when the Mossie was surveyed for breeding waders by the CNPA, the density of breeding waders recorded there made it the second most important site of 46 sites regularly surveyed in Badenoch & Strathspey. An additional 12 sites in the Spey catchment were surveyed in 2006, and none of them supported a higher density of breeding waders than recorded at the Mossie.

In the CNPA report the high densities of breeding waders at the Mossie are considered to be due to the complex matrix of different wet and dry grassland habitats, open water and fens at the Mossie, the generally open nature of the site, as well as the hydrology and history of livestock grazing.

The proposed development would increase disturbance levels in the area of wet unimproved grassland that adjoins the proposal site, through the activities of people, pets and vehicles in and near the proposal site. This wetland provides valuable habitat and in the recent past has supported significant numbers of breeding snipe.

#### Amphibians and Reptiles

The Mossie is known to have supported Common Toad and Common Lizard both of which are on the Scottish Biodiversity List, and Common Frog.

Near the now decadent Aspen tree close to the proposal site, there was a former wet area that supported Common Toad, which may have bred there. Frog and Toad spawn has been found in the large body of water behind the health centre. The wet grassland and fen adjacent to the proposal provides suitable habitat for amphibians. Lizards are likely to breed on the Mossie given the diversity and structure of habitats available.

#### Invertebrates

The Mossie is a well known site for its importance for invertebrates. It is illustrated in the book known as the ‘Bee Bible’ (Field Guide to the Bees of Great Britain and Ireland by Falk and Lewington), which refers to the “plentiful Devil’s-bit Scabious” that “attracts bees such as *Andrena marginata* and *Bombus soroensis*”.

Parts of the Mossie are particularly rich in Devil’s-bit Scabious, an important source of pollen and nectar later in the summer. It is the only known source of pollen for *Andrena marginata*, which is on the Scottish Biodiversity List, is rated Red Data Book Nationally Notable A, and is rare and threatened in much of Europe.

The Leafcutter bee (*Megachile*) has been recorded on the Mossie, which at the time was the only record for the National Park according to NBN.

Butterflies known from the Mossie include Large Heath (Scottish Biodiversity List, classed as Vulnerable); Small Heath (Scottish Biodiversity List, classed as Near Threatened); Small Pearl-bordered fritillary (Scottish Biodiversity List, classed as Near Threatened); Northern Brown Argus (Scottish Biodiversity List, classed as Vulnerable).

Thirty one species of hoverfly are recorded from the Mossie, with two species (*Eristalis rufum* and *Xylota jakatorum*) known to have bred on the Mossie.

Cumulative impacts on biodiversity need to be taken account of. Flower-rich habitats of value to invertebrates have been lost at the Beachen Court site; and Lynemore Care Home has developed the south west edge of the Mossie.

## Access

Public access has been lost since the land to the north west of the caravan site came under the same ownership as the caravan site, and a fence with no access through it (such as a gate) was erected on the east boundary, demarcating the new ownership. Now, following very recent work, the field has been further transformed, with vegetation stripped and major re-profiling of bare soil.

Previously a path lead through this field, from the lower ground of the Mossie to near the top of the field where there was a fine view over the Mossie, the town and beyond to the Cromdales. This path continued and joined the railway line and connected with the various routes that form part of the path network in this part of Grantown.

The proposal would reduce the quality of experience and enjoyment of the countryside through development further encroaching on the Mossie and impacting the quality of landscape and biodiversity which make important contributions to people's enjoyment of the countryside.

Cumulative impacts on access need to be taken account of, with a reduction in access on the Mossie as well as at the fields that have been developed at Beachen Court.

## Waste

We note that there is a large drain emanating from the site and draining directly into the Mossie, with signs of oil in the drained water on the Mossie side of the fence. This source of potentially long- term pollution into the Mossie is of concern, and may increase as a result of the proposed development.

## National Planning Framework 4

We do not consider the proposals to be in line with policies in NPF4, in particular Policy 3 Biodiversity. It is apparent that the Mossie is both exceptional in terms of biodiversity but that its species richness is significantly declining. The proposed development would not fulfil the Policy Intent to protect biodiversity, reverse biodiversity loss, deliver positive effects from development and strengthen nature networks. Neither would the proposal deliver the Policy Outcome of achieving enhanced biodiversity with strengthened nature networks.

## Caravan Sales and Uses

We note that the caravan site advertises “Holiday Homes For Sale”. Concerning the question on the caravan site website ‘Can I live full-time in my caravan’ the website provides the perhaps ambiguous answer “The Caravan Park is open 12 months of the year for holiday use.”

It is unclear how the CNPA or The Highland Council can regulate the use of such ‘Holiday Homes’ on the site. It appears that there is scope for living on a permanent, residential basis on the site irrespective of whether this is permitted.

The proposed development of 16 static caravans, has the potential for these proposed caravans to become residential homes rather than holiday homes. There is also the potential for these caravans to be advertised for sale as having “excellent rental potential” if you “Fancy some extra income” just as comparable caravans at the site are already.

We are concerned that the important landscape and biodiversity as well as people’s enjoyment of the countryside in the National Park may potentially become degraded through this wider use of the caravan site.

Your sincerely

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

Convener