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Dear Emma Wilson

2019/0222/PPP | Erection of 7 No. houses (5 no affordable) | Land 125M NE Of 4 Lettoch Road Nethy Bridge

We apologise that this objection to the above application is non-timeous. This was not intentional and was due to an error on our part.

BSCG hopes that the CNPA will consider the information in this submission, which is intended to focus on information that is additional to points already made in other responses available on the CNPA planning portal.

The following provides information on species recorded on or close to the site this year, as well as potential impacts on other species. These include species for which the site provides suitable habitat, and species which are known from the nearby native pinewood site of School Wood in Nethybridge.

Serrated Wintergreen *Orthilia secunda*

The site supports this nationally scarce flower, which is on the Amber list and classed as 'Vulnerable and Near-Threatened'. The Cairngorms National Park population is classed as of 'Very High Importance' in the context of the whole British distribution. It is one of the 7 higher plant species identified as characteristic of the native pinewoods of Scotland.

Cumulative losses of Serrated Wintergreen within the National Park need to be taken into consideration. These include: loss of the whole population on the site of 6 houses at Rothiemurchus near Heatherbank (2016/0158) and this loss is not mitigated or compensated for. A population in Glenmore beside well-used paths in the beach area is vulnerable to inadvertent damage due to trampling by walkers, being ridden over by cyclists, and being messed on by dogs. A population in Nethybridge on the School Wood Craigmores Road allocation in the current LDP remains under threat of loss if development were to proceed at this allocation. There have been impacts from the installation of road verge infrastructure at Nethybridge and the species is vulnerable to damage from other edge impacts.

Juniper

The site is rich in Juniper which is of 'National Conservation Concern', is on the Scottish Biodiversity List (and is a UK Priority Species). The Cairngorms National Park is an important centre of its distribution within the UK, accounting for Juniper being well represented and having high biodiversity value within the CNP, but of national conservation concern.

The Juniper on the site supports numerous *Oligotropus* galls, the fungus *Gymnosporangium clavariaeforme*, along with other juniper-associated wildlife, including the moth the Juniper berry miner or ochreous argent *Argyresthia praecocella*. It is likely to support the SBL species the small mesh web weaver spider *Dictyna pusilla* which has been recorded from comparable habitat in Nethybridge at School Wood.

Creeping Lady's-Tresses *Goodyera repens*

This attractive pinewood orchid is frequent across the site. It is on the Amber list and is classed as 'Vulnerable and Near-Threatened'. The Cairngorms National Park population is classed as of 'High Importance' in the context of the whole British distribution. It is one of the 7 higher plant species identified as characteristic of the native pinewoods of Scotland.

At a nearby site in Nethybridge at School Wood the associated *Pucciniastrum goodyerae* rust (extremely rarely recorded) has been found. This species, which is readily overlooked, may be present at the site.

Wintergreen *Pyrola* sp.

The site supports this flower. It is yet to be confirmed if the species is *P. minor* or *P. media*. Intermediate wintergreen *P. media* is one of the 7 higher plant species identified as characteristic of the native pinewoods of Scotland.

Chickweed Wintergreen *Trientalis europaea*

The site supports this attractive flower. The Cairngorms National Park population is classed as of 'High Importance' in the context of the whole British distribution. It is one of the 7 higher plant species identified as characteristic of the native pinewoods of Scotland.

Coralroot orchid *Corallorhiza trifida*

This rare orchid is saproxylic and largely dependent on fungi for food. It is classed as 'rare' in the Cairngorms and of National Conservation Concern. It is readily overlooked, and requires to be surveyed during the flowering season. It is known from damp woodland in School Wood.

Lesser Twayblade *Listera cordata* and Twinflower *Linnaea borealis*

Both these species occur at School Wood as well as nearby in Abernethy. The site provides potential habitat and careful survey is required, especially as some populations of twinflower rarely flower and the flowers of Lesser twayblade are often concealed under dwarf shrubs in shade. Both species are among the 7 higher plant species identified as characteristic of the native pinewoods of Scotland.

Scaly Tooth *Sarcodon squamosus*

The tooth fungus Scaly Tooth *Sarcodon squamosus* is present within the site (September 2019). The Scaly Tooth is characteristic of remnants of Caledonian pinewood and also occurs in old pine plantations. It is on the Scottish Biodiversity List, is a UK Priority Species and has a Biodiversity Action Plan. It grows in a mutually beneficial relationship with the pine host.

The Gypsy *Cortinarius caperatus*

This edible fungus is present at several locations on the site. This Highland speciality is extremely rare in the UK south of the Highlands. The Gypsy is described in Scottish Fungi as "a very good bio-indicator of valuable ancient habitat containing a variety of endangered mosses, lichens and other fungi as well as rare plants, insects and vertebrates".

Woodcock

The site is used by woodcock which is on the UK red list of birds of high conservation concern and on the Scottish Biodiversity List.

Capercaillie

The habitat on the site, which is by and large W18 woodland with some wet areas, is suitable for capercaillie and the site is part of a larger woodland that generally provides habitat suitable for capercaillie too. In addition, this more extensive woodland area is contiguous with woodland and wet habitats that are also suitable for capercaillie. Taken together these areas provide a level of connectivity between the SPAs for capercaillie of Craigmore Wood and Abernethy Forest.

Earlier this year capercaillie sign was found some 750m to the north east from the proposal site (at Culstank Moss).

As well as providing suitable habitat and connectivity, the proposal site provides a buffer for the wider woodland from the disturbance associated with the road and the south east edge of the village.

We are also concerned that capercaillie numbers need to rise and their distribution expand very substantially if the UK population is to become sustainable and have a secure future. To deliver this important conservation priority, habitat close to known occupied areas should be considered to be of particularly high value.

There are many cumulative impacts to be considered, including developments (built, under construction, consented and allocated) at Boat of Garten, Carrbridge, Aviemore, Grantown, Inverdrue, Coylumbridge, Glenmore, and An Camas Mor.

Amphibians & Reptiles

The site has suitable habitat for amphibians and reptiles and we are concerned that no survey has been undertaken.

Common toad is known from very close to the site (on the road) and is likely to use the site. This is a Scottish Biodiversity List species (and a UK BAP Priority Species).

Common Lizard is known from School Wood and is likely to use the site. This is also a Scottish Biodiversity List species (and a UK BAP Priority Species).

Brown Hare

Brown hare, which is on the Scottish Biodiversity List, use the woodland on the site, neighbouring woodland and the field directly opposite the site. The woodland at and beside the site is likely to provide valuable day time cover habitat, as well as other resources, for hares using a more extensive area.

Cousin German moth *Paradiarsia sobrina*

This rare and local species is known from School Wood. Its two food plants of birch and blaeberry are abundant across much of the proposal site which provides habitat very comparable to that at School Wood.

Mountain or Blaeberry bee *Bombus monticola*

The site is likely to be used by *Bombus monticola* which is on the Scottish Biodiversity List. *Bombus monticola* has long been documented from School Wood and has been found nesting in pinewood habitat at An Camas Mor. The proposal site supports foraging flowers important for this species, including blaeberry, cowberry and ling, with blaeberry flowers early in the season considered especially important for emerging queens.

Other Pollinators

The site supports a range of pollinating insects, including moths, butterflies, hoverflies, other flies (Diptera) and bees.

The site provides potential foraging and other habitat for some significant wild pollinators, including foraging and breeding habitat for bees, such as bumble bees and solitary bees. The site is likely to support the blaeberry specialist, the Blaeberry mining bee *Andrena lapponica*, which is known from School Wood and woodland at An Camas Mor and which lost a known breeding site due to the recent development in pinewood at Boat of Garten.

Some of the smaller insects likely to use the site include species that pollinate pinewood rarities such as twinflower (populations of which in the CNP are considered to be suffering from inadequate out-breeding).

Deadwood

The site has a substantial amount of fallen and standing deadwood which contributes to its biodiversity value. Deadwood on the site supports various deadwood-associated beetles including longhorn beetles, as evidenced from exit holes. The old galleries of some longhorn beetles provide a home for the pinewood mason bee *Osmia uncinata* that is on the Scottish Biodiversity List and classed as 'vulnerable'; and the bumble bee robberfly *Laphria flava* that is also on the Scottish Biodiversity List. The sunny woodland edge habitat at and very near the site support flowers that contribute to the habitat needs of both these species. Both these species are known from nearby School Wood. Both species would suffer cumulative impacts were the Craigmor Road site allocated in the current LDP to be developed; and were the An Camas Mor site to be developed.

Impacts Beyond Proposal Site

Housing inevitably has negative impacts on surrounding areas, through such things as lawn mowings and general garden waste being put over the garden fence, the effects of dogs and cats both as predators and through the habitat impacts of their mess (e.g. on fungi), the spread of garden plants including non-native invasive species, as well as general disturbance.

Recreational Impact

The proposal would reduce the quality of recreational experience for people using the Lettoch Road, that is a long established and particularly scenic element of Nethybridge's network of promoted routes.

Information Sources

Andy Amphlett 2013. The Flora of the Cairngorms National Park A Rare Plant Register.

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