



## **Campaigning for the Conservation of Wild Land in Scotland**

*Publisher of Scottish Wild Land News*

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Convenor

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Dear Sir

### **OBJECTION TO PLANNING APPLICATION 17/04601/FUL**

I am writing to **object** to the above development proposal on behalf of the members of the Scottish Wild Land Group.

This proposed development is in conflict with several of our charitable objectives, including

- The protection and promotion of Scotland's wild land
- Environmentally sensitive land and wildlife management
- The connection of habitats and protected areas to allow ecological recovery and species movements.

The development proposal includes the sites of the Dornoch Firth and Loch Fleet Special Protection Area [SPA] and Ramsar site, the Loch Fleet Site of Special Scientific Interest [SSSI], the tidal basin of the Loch Fleet National Nature Reserve, and is adjacent to the Moray Firth proposed SPA. In addition, there are European Protected Species, including mammals, birds and invertebrates, in specific habitats and areas of the site. This range of environmental and ecological designations indicates the high significance and importance of the site both nationally but also internationally. These designations protect the site under both national and international law.

The grounds on which we object include failure to comply, as indicated from our scrutiny of the information supplied in the range of documents that the Applicant has supplied, with the following

- Scottish Planning Policy
- The Highland Council's Highland-wide Local Development Plan, Policy 57
- The Conservation [Natural Habitats etc] Regulations 1994 and the Conservation of Habitats and Species Regulations 2010, as amended.

We also object for the following reasons:

- The potential impacts of the development would be very likely to compromise the integrity and objectives of the site designations.



- It would result in significant adverse effects on sand dune habitats of national importance.
- There is insufficient information, depth and accuracy in the EIA and Environmental Statement [including on feasible mitigation strategies] to enable the Highland Council to conclude beyond reasonable scientific doubt that there would not be an adverse effect on the designated sites.

The Applicant has not complied with the procedures and application of the Birds and Habitats Directives in several areas. For example, there has been no full identification and evaluation of Alternatives. Furthermore, the survey work carried out by their contractors is also inadequate in that ecological baselines are not accurate or sufficiently precise, either for flora or fauna. Ecological impacts due to the use of fertilisers and pesticides to encourage monocultures of non-site endemic grasses to grow have not been assessed accurately enough, in particular the potential impacts and consequences of nutrient enrichment on water quality. There will also be impacts on hydrology due to the impacts of changes to water tables during construction activity and subsequent maintenance and operation of the site. The environmental impacts of none of this have been adequately identified, considered and assessed. In addition, the mitigation strategies proposed are mostly unlikely to be successful, such as the proposal to translocate dune heath, which would probably result in loss and damage of species and contribute to loss of site integrity.

The very extensive proposed development site includes a mosaic of interconnected habitats all of which are increasingly rare. It extends inland from very mobile sand dunes, over species rich wild flower stabilised dunes and seasonally flooded dune slacks to heathery heath covering ancient dunes. The area is populated by a rich and unique flora and fauna. One species, the Fonseca's Seed Fly, occurs only in this area and is unique globally, for example. Presently, there is almost uninterrupted seasonal free movement of species between habitats, essential for the resilience and sustainability of the area. Habitat modification involving damaging fragmentation on such a scale would destroy the dynamic functioning of the site and introduce significant adverse impacts on the species living there by preventing essential free movement, and causing imbalance and loss of functioning. . The proposed "stabilisation" of parts of the site would be totally inappropriate as this interaction would be prevented. The proposed construction would effectively be a network of barriers embedded among the dune habitats which would severely disrupt ecological coherence.

Additionally, there would be a greater level of human disturbance and no realistic buffering from this is proposed. Many of the species that would be affected are Amber or Red listed, and their survival is already threatened.

All of these habitats are increasingly rare due to human activity and climate change effects.

The site is more extensive than that already damaged, to very little local economic advantage, by another overseas input, the Trump development in Aberdeenshire, which was short sighted and an example of poor decision making and future proofing. The claimed socio-economic benefits and future investment of the Trump golf course have not materialised and seemingly will not be in the foreseeable future, so the Highland Council should be urged to exercise caution when evaluating these aspects of the application. We appreciate of course that these points are not perhaps material planning considerations. It would, however, be most undesirable to repeat such irreversible errors at Coul and mistakes can be learned from the example quoted.

At the moment, this is the last complete dune system left in Scotland that has not suffered anthropogenic detriment, not only that, but it is thought to be one of the last representatives of this type of habitat in Europe. It should be valued as a pristine national asset of considerable significance; Scotland should be conserving and enhancing sites such as this and not be prepared to destroy them for future generations to enjoy, and use for education, research and the increasingly important wildlife tourism sector. By contrast, golf tourism is, if anything, over catered for throughout Scotland compared with the income generated, especially for local communities. It certainly does not justify environmental damage of international significance, and perhaps to the detriment of our reputation and standing, on this scale. Scotland needs to offer tourists much more than the predictable golf, whisky and shortbread, and to also imaginatively use our unique national assets to encourage both visitors and residents to enjoy the full range of what the country has to offer.

The Scottish Wild Land Group is not at all anti-development. We very much appreciate and sympathise with the desirability for remote communities in particular to be able to thrive and be successful, supported by innovative and diverse industries with a long term future, together with the necessary infrastructure. However, we consider that this development will cause an unreasonable amount of environmental harm compared with the failure of the Applicant to indicate its necessity and dubious benefit to the local community at the level indicated. There is also a substantial international reputational risk for Scotland if it went ahead.

For the above reasons the Scottish Wild Land Group's opinion is that The Highland Council should robustly refuse the application.

Yours faithfully

Beryl Leatherland

