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14 December 2017

The Head of Planning and Building Standards,  
ePlanning Centre,  
The Highland Council,  
Glenurquhart Road.  
Inverness  
IV3 5NX

By email – [epc@highland.gov.uk](mailto:epc@highland.gov.uk)

Dear Sir or Madam,

**Reference: 17/04601/FUL: Development of 18-hole golf course, erection of clubhouse, renovation of existing buildings for maintenance facility, pro-shop, caddy hut, workshop, administration building, information booth, formation of new private access from C1026.**

**The Botanical Society of Britain & Ireland OBJECTS to this proposal as it will result in significant adverse effects on internationally and nationally important sand dune habitat.**

Coul Links is in the Dornoch Firth & Loch Fleet Ramsar site. The Information sheet for this Ramsar Site states that it is **internationally** important because it contains a number of Habitats Directive Annex I features including: Embryonic shifting dunes, Shifting dunes along the shoreline with Marram Grass (“white dunes”), Fixed dunes with herbaceous vegetation (“grey dunes”), Decalcified fixed dunes with Crowberry, Atlantic decalcified fixed dunes, Humid dune slacks and Coastal dunes with Juniper.

Coul Links is also in the Loch Fleet Site of Special Scientific Interest which is notified to protect a number of natural features, including “Sand dunes” and “Vascular Plant Assemblage” – both of which are therefore **nationally** important. Its citation describes Coul Links as “an extensive dune system which is unusual in displaying a complete transition from foredune to slacks. Coastal heathland is well developed in drier areas, supporting juniper scrub locally. Flooded slacks and winter lochs contribute to the variety of habitat, with a rich diversity of vascular plants...”.



Sixteen of the 18 golf course greens are proposed to be constructed in the Ramsar site and the SSSI, which will result in significant permanent loss of sand dune habitat, especially dune heath and dune slacks.

The construction of the greens amongst the sand dune habitat will also lead to habitat fragmentation.

This habitat has evolved naturally over many thousand years. Attempts to translocate the habitat are very unlikely to result in habitat of the same quality.

A key feature of sand dune systems is their dynamic nature. The proposal will result in their stabilisation.

Sand dune habitats are naturally nutrient-poor. Those habitats that are not immediately destroyed by the proposal are likely to be adversely affected in the long term by run-off from the fertiliser applied to the greens.

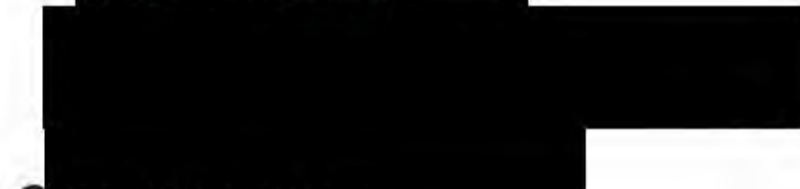
The use of herbicide on the greens and fairways is likely to have an adverse effect on the adjacent, remaining, native flora.

Drainage of the fairways, greens and paths will adversely affect the hydrology of the surrounding sand dune habitat - particularly in the winter, when the flooded slacks are at their most important.

Overall the proposed development would irreversibly compromise the ecological integrity of the sand dune system and the SSSI as a whole.

All these adverse impacts to the sand dune habitats will also adversely impact the vascular plants species, many notable, that occur in them. We disagree with the conclusion drawn in the Environmental Statement, that the Vascular Plant assemblage is not of national importance. We provide justification of this view below.

Yours faithfully,



Chris Metcalf

BSBI President

Specific points about the Environmental Statement regarding vascular plants:

1. The surveyors have failed to understand that the Vascular Plant Assemblage includes all species listed as Nationally Scarce or Nationally Rare at the time the site was notified, not just those mentioned in the citation under the Vascular Plant Assemblage heading. Our recorders have found five other Nationally Scarce species in the site: Coralroot Orchid (*Corallorhiza trifida*), Baltic Rush (*Juncus balticus*), Red Bartsia (*Odontites vernus* subsp. *litoralis*) and Reflexed Saltmarsh-grass (*Puccinellia distans* subsp. *borealis*).
2. The surveyors incorrectly conclude that they only need to consider the one species listed under the Vascular Plant Assemblage heading as occurring in the sand dunes - Seaside Centaury (*Centaureum littorale*).



3. Furthermore, they describe this species as one of saltmarshes, whereas Stace's *New flora of the British Isles* (2010) describes it as occurring in coastal dunes and sandy turf. It is therefore more likely to be affected by the proposed development.
4. They failed to find the species (probably because they were surveying the site too early in the season, before it flowers) and conclude therefore that the Vascular Plant Assemblage is not of national importance. Absence of evidence is not evidence of absence.
5. The Environmental Statement omits to report the IUCN categories of the vascular plant species in Table B.12. However, they are included in the equivalent table (Table 3) of Appendix B.2 The Habitat Survey Report. For information, Purple Milk-vetch (*Astragalus danicus*) is **Endangered**, whilst Frog Orchid (*Coeloglossum viride*) and Lesser Butterfly-orchid (*Platanthera bifolia*) are both **Vulnerable** and Autumn Gentian (*Gentianella amarella*) and Wild Pansy (*Viola tricolor*) are both **Near Threatened**.