

Martha Rojas-Urrego, Secretary General; and
Tobias Salathé, Senior Advisor for Europe,
Secretariat of the Ramsar Convention
Rue Mauverney 28
CH-1196 Gland,
Switzerland

22 November 2017



Dear Ms. Rojas-Urrego and Mr. Salathé,

Golf course development threat of change to the ecological character of Ramsar Site 897 *Dornoch Firth and Loch Fleet*

Our organisations are writing to you jointly to advise you of a proposed development that poses a significant threat to the listed features of Ramsar Site 897 *Dornoch Firth and Loch Fleet*.

Reasons for listing as a Ramsar Wetland of International Importance

Dornoch Firth and Loch Fleet is a unique example of undeveloped coastal dunes and seasonally flooded dune slacks, and supports a wide range of species and habitats. As noted on the Ramsar Site's Information Sheet¹, Dornoch Firth and Loch Fleet contains extensive sandflats and mudflats, backed by saltmarsh and sand dunes with transitions to dune heath. The sand dune, saltmarsh and estuary habitats are of international importance for their flora and geomorphology. The proposed development is situated within the complex of sand dune habitats at Coul Links – these habitats, in particular the winter flooded dune slacks, are not replicated elsewhere within the Ramsar site.

Site 897 *Dornoch Firth and Loch Fleet* is listed as a Ramsar Wetland of International Importance for meeting Ramsar criteria 1, 2, 5 and 6. It is considered internationally important under Ramsar criterion 1 for containing rare and unique examples of wetland features (most notably saltmarsh, sand dunes and intertidal mudflats and sandflats). The listed features under Ramsar criterion 2 include nationally-scarce aquatic plants and British Red Data Book invertebrates, including Fonseca's seed fly which is endemic to Scotland and has very limited distribution. It is additionally considered internationally important under criterion 5 for supporting more than 20,000 waterfowl.

Finally, under Ramsar criterion 6 site 897 supports internationally important populations of Eurasian wigeon, *Anas penelope* (3.4% GB population), greylag goose, *Anser anser* (3% population) and bar-tailed godwit, *Limosa lapponica* (1.7% GB population). In addition to the listed features this Ramsar site supports several species in nationally important numbers, namely: Osprey, *Pandion haliaetus*, Whooper swan, *Cygnus cygnus*, Eurasian teal, *Anas crecca*, Common redshank, *Tringa totanus*, Otter, *Lutra lutra* (Habitats Directive Annex II species), Harbour seal, *Phoca vitulina* (Habitats Directive Annex II species), red pine hoverfly, *Callicera rufa*, *Grzegorzekia collaris*, *Dicanthous (Harminius) undulates* and *Saldula opacula*.

¹ <http://jncc.defra.gov.uk/pdf/RIS/UK13011.pdf>

The site is additionally designated as a Special Protection Area (SPA) under the Birds Directive 2009/147/EC for internationally important bird species and part of the site is also designated as a Site of Special Scientific Interest (SSSI) under the Nature Conservation (Scotland) Act 2004 for its intertidal marine habitats, salt marsh and sand dunes, native pinewood, vascular plant assemblage, bottlenose dolphin, *Tursiops truncatus*, and nationally important bird species.

Proposed development and potential impacts

The development proposal is for an 18-hole golf course, the layout of which is partially situated within the section of the Ramsar Site and SPA that is underpinned by the Loch Fleet SSSI. The golf course would result in the direct loss of and modification to sand dune habitats including the rare undeveloped sand dune and back dune habitats, which form part of the reasons for the site's listing under criterion 1, and as mentioned are not replicated elsewhere in the Ramsar site. This is likely to result in the loss of some plant species, changes to the dune geomorphology as well as disruption to the natural processes across the dune system.

In addition, the habitat fragmentation caused by the proposed development may inhibit many species from moving freely within and between habitats, and fragmented plant populations would be threatened by genetic isolation. Habitats may also be impacted through changes in hydrology as a result of the proposed groundwater extraction and drainage modifications. Habitat loss, intensified human activity and increased recreation across the site could result in significant disturbance to nationally and internationally important species, including overwintering Icelandic greylag geese, Eurasian wigeon, teal, oystercatchers, redshank and curlew which are listed features under the Ramsar and SPA designations.

We therefore believe that the proposed development has the potential to have adverse impacts on the integrity of the site and its listed features and as such qualifies as an Article 3.2 case under the Ramsar Convention. In the first instance, responsibility for project consenting lies with the local government body The Highland Council. The Highland Council have indicated that they will accept public comments on the proposed application for project consent up until the 1st December 2017. If they are minded to, the Council could then move quickly to approve the project. Scottish Ministers could call in the project for their own determination but they would need to do so before a final consent is issued and so far, they have indicated that they would not intend to do this.

Recommendations

Our organisations will continue to urge the relevant authorities to ensure that the site is protected but we believe there is a serious and immediate threat to the site. We therefore appeal to the Ramsar Secretariat, as a matter of urgency, to consider inclusion of the site on the Montreux Record and to request the UK Government to take swift and effective action to prevent human induced ecological change to the site, in line with Recommendation 4.8.

We are keen to provide the Secretariat with further information about the likely impacts of the proposal once we have carried out a detailed assessment, having now received the finalised development planning application and supporting documents. In the meantime, if the Secretariat would like additional assistance, please do not hesitate to contact Bruce Wilson, Senior Policy Officer, Scottish Wildlife Trust at bwilson@scottishwildlifetrust.org.uk or 0131 312 7765.

Coul links is particularly special as a complete, undisturbed dune system, and is one of the last remaining in Scotland. Similar dune systems elsewhere have been destroyed by development. We therefore appreciate your time and support in ensuring the continued protection of the site.

Sincerely,

Jonathan Hughes
Chief Executive, Scottish Wildlife Trust

Signed on behalf of and with the support of:

Craig Macadam, Director, Buglife Scotland
Paul Kirkland, Director, Butterfly Conservation Scotland
Calum Duncan, Head of Conservation Scotland, Marine Conservation Society
Ben McCarthy, Director, Plantlife
Anne McCall, Director, RSPB Scotland
Jonathan Hughes, Chief Executive, Scottish Wildlife Trust