

TOWN AND COUNTRY PLANNING SCOTLAND ACT 1997

TOWN AND COUNTRY PLANNING (INQUIRIES PROCEDURES) (SCOTLAND)
RULES 1997 AS AMENDED



**OUTLINE PLANNING PERMISSION FOR GOLF COURSE AND RESORT
DEVELOPMENT ON LAND AT MENIE HOUSE, BALMEDIE, ABERDEEN**

ECOLOGY

REBUTTAL PRECOGNITION OF

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Evidence on behalf of Scottish Natural Heritage

(DPEA REFERENCE: CNS/ABS/001)

2ND June 2008

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Introduction

1. The purpose of this statement is to rebut certain specific assertions of identified witnesses and productions in respect of ecology in the absence of my principal precognition explicitly dealing with such matters.

Precognition of Dr T Dargie for TIGLS on Ecology

2. Dr Dargie states in his precognition that he has previously expressed concern regarding the development to SNH and he also identified that “*golf development was a very significant threat to site geomorphological and ecological integrity.*” (Section 3.3). He outlines the habitat and species interests of the land within the development proposal and provides a detailed consideration of his analysis in relation to the Championship golf course design iterations (Fazio II and Hawtree).
3. Dr Dargie also identifies that some areas of the SSSI are in unfavourable condition in relation to the standardised Site Condition Monitoring programme (section 5). SNH agrees that damage has occurred as a result of grazing and winter feeding. These activities have been undertaken without consent by SNH. However, while SNH is concerned by this damage, it is at a small scale and can be reversed, in contrast to the golf course, which is large-scale, and which would be very difficult to reverse.
4. In section 5.30 – 5.41, Dr Dargie stresses the importance of a range of environmental gradients such as acidity and soil wetness, in determining the nature of the vegetation. I contend that it is this complexity, in turn related to the range of dynamism within the development site that gives this area its very high habitat value, represented by a range of habitats listed on Annex 1 of the Habitats Directive, two of them with Priority status. This complexity of processes would be difficult, if not impossible, to emulate in any receptor site.
5. In his description of habitats (Section 5), Dr Dargie identifies a number of Annex 1 habitats. Any habitat listed on Annex 1 is by definition of international importance, yet Dr Dargie has described grey dune – Priority rated on Annex 1 – as of regional importance. It should be noted that the crowberry heath, an Annex 1 habitat that features so strongly on this site is restricted to Scotland in the UK.
6. The evidence provided by the applicants appears to SNH to admit that most of the development site is of high conservation importance and that the golf course(s) will have an adverse impact on this value, affecting both the SSSI and the land to the south. Mitigation is proposed which, according to Dr Dargie, would compensate for the admitted losses, yet, as presented in the evidence of my colleague Mr Rooney, the likely effectiveness of proposed mitigation is poorly supported by evidence.