



Campaigning for the Conservation of Wild Land in Scotland

Publisher of Scottish Wild Land News

Beryl Leatherland
Convenor
57 Charles Way
Limekilns
Fife
KY11 3LH

The Highland Council
Planning and Building Standards
Glenurquhart Road
Inverness IV3 5NX

15th March 2020

Our ref: OTHC20201

Dear Sir

Application ref: 20/00616/FUL Construction of vertical launch space port with launch operations control centre, site integration facility, launch pad complex, antenna park, access road, fencing, services and associated infrastructure Land 2600M SW of Dunbuie Talmine Tongue.

I am writing on behalf of the Scottish Wild Land Group [SWLG] to lodge our **objection** to this proposed development. Our aims are to protect and enhance wild land in Scotland, to promote the conservation of wildlife and their habitats and to encourage the implementation of good planning policies and decision making. We campaign on these matters in our members' interests.

The development proposal has the potential to impact on valued and sensitive landscapes including the Ben Hope and Ben Loyal Wild Land Areas [WLA] and the Kyle of Tongue National Scenic Area [NSA]. These are not within the development site itself, but there is the potential to impact on the special qualities of the NSA and the WLA descriptions. The NW Highland Geopark is in the vicinity and the Highland Council Eriboll East and Whiten Head Special Landscape Area is adjacent to the north. The project will not comply with the Highland Wide Local Development Plan [LDP] Policy 61 as it does not enhance or protect the landscape and has the potential to cause significant adverse effects, and we consider that the mitigation proposed will be inadequate. It should be noted that as a result of an amendment passed during the debate stages of the Planning Bill that progressed through the Scottish Parliament in 2019 that NSA protection will be strengthened in the new Scottish Planning Act.

Although WLA is not a designation NPF3[2014] recognises wild land as a "nationally important asset" and indicates that Scotland's landscapes merit strong protection; and this is further supported in Scottish Planning Policy at paragraphs 193, 200 and 215.

In addition, the development is close to or overlapping sites which are designated nationally or internationally for important wildlife and habitats. These include the Caithness and Sutherland Peatlands Special Protection Area [SPA], Special Area of Conservation [SAC] and Ramsar wetland, the Ben Hutig and A'Mhoine Sites of Special Scientific Interest [SSSI] and the North Sutherland Coastal



Islands SPA. The area is frequented for breeding, roosting and feeding by several bird species listed in Annex 1 of the Birds Directive and Schedule 1 of the Wildlife and Countryside Act. In addition, there are vast expanses of blanket bog which is listed on Annex 1 of the Habitats Directive. Blanket bog is a globally rare habitat and important in carbon sequestration. There are extensive areas of peat on site, some of which is in a degraded condition but which has potential for restoration, further contributing to carbon storage. We have particular concern over the potential for disturbance impacts on bird species due to noise, lighting regimes, increased traffic, construction and operational impacts and visitor activity.

The Applicant has not supplied sufficient evidence that mitigation strategies will be adequate to eliminate likely adverse significant effects on site integrity and the viability of species. This is especially concerning considering the lifespan of the project when many generations of birds could be impacted. Thus the Applicant's proposals will not in our opinion comply with the Highland Wide LDP Policy 58, Protected Species. There appears to be no Habitats Regulations Assessment which we consider to be essential given the high importance of the local wildlife.

We would additionally comment that the survey work completed does not appear to be as full as we should expect, with clear baselines and evidence of adequate survey work carried out over a number of seasons.

It is difficult to fully evaluate this project proposal as there are so many omissions from the information provided. For example, there is

- no Habitat Management Plan,
- no Visitor Management Plan [despite the existing impacts of the NC500],
- no Construction Traffic Management Plan – essential when moving materials and lengthy loads on roads where there is limited capacity for overthrow,
- no specified arrangements to accommodate workmen
- no application of the IROPI test [imperative reasons of overriding public interest] as specified in the Directives
- no details of launch pad construction
- no adaptation of the launch schedule to accommodate bird breeding seasons and times of peak visitor impacts.

All of the above make it difficult for SWLG to do other than object to the proposal.

Should you have any queries or require clarification regarding the points made above, please do not hesitate to contact me.

Yours faithfully

Beryl Leatherland

Convenor SWLG