

Scottish Natural Heritage  
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26<sup>th</sup> September 2019

To Whom it May Concern:

**Proposed partial denotification of Foveran Links SSSI**

Please treat this letter as a representation to the proposed partial denotification of Foveran Links Site of Special Scientific Interest (SSSI).

RSPB Scotland supports the proposed partial denotification of Foveran Links SSSI, on the basis that the notified natural features on the Menie Links section of the SSSI have been irreversibly destroyed, damaged or fragmented through extensive direct and indirect impacts. 34% of the semi-natural habitats in the Menie Links section have been destroyed or severely modified, including “*the losses of 99% and 90% of the Menie and Sandend sand sheets respectively – both key geomorphological features in the SSSI...as well as the loss of 64% of the dune slacks/open water habitats in the estate.*”<sup>1</sup> It is our understanding that both the geomorphological and biological interests are being denotified on this part of the SSSI.

It was on the basis of the potential adverse impacts to the SSSI that RSPB Scotland, SNH and a number of other conservation organisations objected to the planning application for Trump International Golf Links. This confirms our fears that this development would have an irreversible impact on this nationally important site. In their evidence at the public inquiry SNH warned that the scale of impacts of the development could be such that “*This would remove the geomorphological interest of the site. It would be up to SNH to consider whether this part of the SSSI should be denotified.*”<sup>2</sup>

It is highly regrettable that the predicted adverse impacts have indeed come to pass, on a site that was described as ‘*unparalleled in Great Britain*’ for its special features.<sup>3</sup> However we agree there is no longer any scientific grounds upon which to maintain the notification of the site as part of Foveran Links SSSI.

Regards,

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The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654

<sup>1</sup> <https://www.nature.scot/sites/default/files/2019-06/Foveran%20Links%20SSSI%20-%20reasons%20for%20proposed%20partial%20denotification.pdf>

<sup>2</sup> Dr Hansom for SNH, paragraph 3.1.10 <https://www2.gov.scot/resource/doc/212607/0067709.pdf>

<sup>3</sup> Dr Hansom for SNH, paragraph 3.1.4 <https://www2.gov.scot/resource/doc/212607/0067709.pdf>