

**The Highland Council: West Highlands and Islands Local Plan Examination  
Expansion site MU5 and MU7 (Blàr Mór and Caol/Lochyside)  
Representation 694, Dr Ian Strachan**

I refer to the questions posed by the Reporter Mr Russell, in a letter from Mr Archibald of the Scottish Government Directorate for Planning and Environmental Appeals, sent to me on 16 November 2009, regarding the above.

**Subject 6** (environmental constraints on development) and **Subject 8** (adverse effects of development).

The development of these two sites could result in the destruction of up to ~60 ha of blanket bog on deep peat. Such an outcome would seem completely contrary to global, European, UK and Scottish commitments to sustainable development, from the Convention on Biological Diversity and the Habitats Directive through to the Scottish Biodiversity Strategy and the Local Biodiversity Action Plan. I consider it would also be inconsistent with the Council's Biodiversity Duty conferred on them by the Scottish Government, and specifically with General Policy 13 for Important Habitats.

Blàr Mór, also known as Corpach Moss, is the remains of a large expanse of peat bog which has developed since the last ice age on alluvial deposits at the southern end of the Great Glen – bounded by the River Lochy to the east and south, Loch Linnhe to the west and Meall Bhanabhie (Banavie Hill) to the north. At least part of the Moss may have developed through natural infill of a freshwater loch, which historians suggest was the original 'Loch Aber' from which the district takes its name, though hard evidence of this has yet to be found. It would have been an important local source of peat for fuel in historical times and there is widespread evidence of past cutting, but the majority of the bog, roughly 80 hectares, has survived, with its characteristic flora and fauna, as an outstanding example of its habitat type. More recently the bog has been 'eaten into' by developments around the margins, at Caol, the Blàr Mór Industrial Estate, and the Health Centre. Nevertheless what remains is still an outstanding site for biodiversity.

A vegetation survey and preliminary hydrological condition assessment of Blàr Mór was carried out for Scottish Natural Heritage by J.M. Morris in 1999. This mapped, described and evaluated the vegetation and habitats present across the whole peatland unit, which is almost entirely included within sites MU5 and MU7.

The area to the southwest of the railway line, comprising most of site MU7, has been adversely affected by repeated burning, reducing the quality of the habitat. In contrast most of the area northeast of the railway (almost all of site MU5), and especially the area northeast of the A830 trunk road, has well-developed bog vegetation with an abundant carpet of bog mosses, indicating much less impact from fire. It also has other valuable features, notably sedge swamp, boggy pools, and patches of birch woodland, including areas with naturally stunted trees on bog vegetation, a habitat type known as 'Bog woodland'. Natural birch bog woodland is thought to be extremely rare in Britain, and this may be one of the largest and best examples we have in Scotland.

There are many reasons why the Blàr Mór, and particularly the area east of the railway, should be preserved from further development and destruction.

- It is an important and unusual example of Active Blanket Bog, a habitat for which Scotland has an international responsibility. It also supports scattered birch woodland of a special type called Bog woodland, which is exceptionally rare in the UK
- Active blanket bog and Bog woodland are both listed as a European Priority Habitats in the EC Habitats Directive, and destruction of this bog would be contrary to the aim of the

Directive 'to maintain or restore, at favourable Conservation status, natural habitats and species of wild flora and fauna of [European] Community interest.'

- Blanket bog and Wet woodland are both designated as Priority habitats in the UK Biodiversity Action Plan and the Scottish Biodiversity Strategy, and highlighted in the Lochaber Biodiversity Action Plan as important for conservation.
- The Blàr Mór supports a rich wetland flora and fauna, including dragonflies and butterflies, and breeding birds such as curlew
- It forms the 'green heart' of the Fort William conurbation, crossed daily by hundreds of people, both locals and visitors, and adds greatly to the rural character of Fort William.
- It is an important historical resource, likely to hold evidence in the peat layers of the history of the area around Fort William. No comparable site exists close by.
- It may well be the ancient site of Loch Aber, from which the District takes its name.
- It is an important educational resource, used for example by Lochaber High School for teaching biology and ecology
- It is increasingly recognised that blanket bog plays a key role in the carbon cycle, holding a huge quantity of CO<sub>2</sub>. Destruction of bogs such as this contributes significantly to greenhouse gas emissions through oxidation of the peat and loss of its storage capacity.
- Wetlands and especially bogs play a key role in sustainable flood management, Bogs act as giant 'sponges' to absorb and hold water, releasing it only slowly. Many of the recent flooding problems in lowland Britain result in part at least from the loss of wetlands.

The Blàr is just as important and irreplaceable as man-made historical features such as the old Fort, or Inverlochy Castle. I am sure no one would dream of destroying either of these, but because the Blàr Mór is a bog, is not so widely valued or appreciated.

### **Subject 3 (Environmental Report).**

There are quite a number of references in the Environmental Report which are relevant to consideration of these proposals. Some are highlighted below.

The report acknowledges that the allocation for MU5 will affect 'natural heritage designation or area identified for its importance to nature conservation' and 'priority protected or priority habitat or species', and the latter for MU7.

Table 5.3 in the report highlights 'loss of peatland cover' as a potential environmental problem for the Plan area, which would be an inevitable consequence of development of these sites.

The importance of peat for storing carbon is referred to in Appendix 10 in relation to the EU Soil Thematic Strategy.

In relation to the Lochaber Biodiversity Action Plan (2004) the report states that 'the development plan should be aware of important species and habitats within the plan area and should aim to protect these areas from development.' Blanket bog, wet woodland and fen, which are key features of the Blàr Mór, are all listed as important habitats in the LBAP.

### **Subject 5 & Subject 7 (scope to accommodate different uses)**

A bog such as this has complex hydrological interdependences, and cutting away part of the peat body will generally have an adverse effect through drainage on a much larger area than just that cut away.. It is very difficult to say without detailed hydrological studies what effect for example the removal of peat from MU7 would have on MU5. It may be that MU7 could be developed with only limited impact on MU5. However I would advise that, to secure the ecological integrity and importance of site MU5, in particular the area east of the A830 (which is the most important part of the Blàr Mór for biodiversity), there should be no further development on areas with peat deposits to the east of the railway line. Further

encroachment or fragmentation may well have a severe adverse effect on the integrity of the bog. Within that limitation there may be some scope for development, whilst retaining the core interest of the site, on the eastern and northern margins of MU5, and possibly west of the A830, subject to hydrological research, and dependent on the nature of development.

I would recommend that the bog itself should be established as a Local Nature Reserve for the local community (together with wetlands associated with the River Lochy and Caol Bay) as promoted in section 6.4 of the Lochaber Biodiversity Action Plan.

### **Response by Highland Council**

In response to the comment by Highland Council that Blanket bog is not rare in a Highland context, I would reiterate that (a) blanket bog is globally rare (b) this site is in a better condition than many areas of blanket bog in the Highlands (c) the Blàr Mór has other unusual features, in particular birch bog woodland which is very rare in the Highlands and Scotland as a whole.

I would also comment that the 'mitigation' proposed would in no way compensate for the loss of habitat which would result from the removal of blanket bog.