

A. Comments for Reporter's Specified Subjects (RSS)

To avoid re-iteration, please refer to my letters of 12th March 2008 and 7th June 2006 for further explanations.

RSS 3.

Yes, in the SEA Revised Environmental Report, December 2008 and Appropriate Assessment there are relevant findings for consideration in this determination, in particular :

This proposal for **MU 5 on the Blàr Mór** seems to contradict the following Council's General Policies : 4, 6 and G2, 10, 11, 12, 13 and 14. An outline of the reasoning for each of these contradictions is given in my letter of 12th March 2008.

Additional comments on the SEA, along with those dated 12th March 2008, are as follows :

- ❖ For SEA Q1 : If the development were to proceed, could some of the existing fine-quality distinctive West Highland blanket bog be retained as public open space instead of replacing it with urban landscaping (a habitat which could be in any Scottish town).
- ❖ For SEA Q 18 : why is there no requirement for the Developer to retain a portion of the good quality (active) Blanket Bog which is a European 'priority habitat'?
- ❖ For SEA Q 26 : would the planting be to create a characteristic Lochaber habitat or an urban setting which could be in any town in the UK ?

This proposal contradicts at least 3 of the objectives within the Lochaber Biodiversity Action Plan, and has the potential to damage a number of EU, UK and local BAP 'priority habitats and species', especially blanket bog which is specially protected as a European 'priority habitat' under EU and UK legislation.

This area contains much active Blanket Bog which is a European priority habitat as defined in the EU Habitats and Species Directive. There are also sections with birch-fringed bog, defined as Bog Woodland which is a habitat with European importance and is very limited in quantity. These habitats support a variety of native plants, mammals, birds, amphibians and invertebrates which are characteristic of good examples of blanket bog ecosystems situated near the Atlantic. The blanket bog east of the A830 is in very good condition and its species diversity of plants and animals indicate that it has been less affected by burning, grazing, digging and other pressures which have lowered the ecological value of many peatlands in the Highlands.

RSS 6.

There would be the loss of a fine example of relatively undisturbed active Blanket Bog and of Bog Woodland. This would contravene EU and UK Natural Heritage legislation. An appreciable area of heather would be lost as a food source for local bees (domestic and wild). There would be increased 'carbon footprint' impacts from disturbing and digging out peat. The change from open native habitats to continuous urban sprawl would result in the loss of visual amenity for walkers, cyclists and other travellers along the A830 and hillwalkers on the Ben and surrounding hills.

There would also be environmental constraints in changes to the water table and drainage. There would be constraints on development from the displaced ground water and its availability for wild plants and animals would be altered either by loss, reduction, or increasing the levels in lower areas, depending on which SUDS methods were employed. There may be other potential flooding issues including those relating to high tides at Caol.

RSS 5. & 7.

If it is decided that the area north-east of the A830 has to be developed, a sustainable part of the blanket bog and bog woodland in this should be retained undeveloped and protected, including its hydrology, as a prime example (which should be the minimum environmental requirement). If development were to proceed then guidance from Scottish Natural Heritage should be obtained on the area to be conserved, which would allow the blanket bog and bog woodland to retain all their present natural and semi-natural features. There would need to be adequate mitigation measures to maintain their hydrological and ecological good qualities.

RSS 8.

Adverse effects to the wildlife in this area and for humans would come from :

- ❖ Loss of an EU priority habitat active Blanket Bog, and of relatively rare bog woodland.
- ❖ Loss of habitats for native mammals, birds, amphibians, and invertebrates.
- ❖ Loss of a semi-natural resource and open space for human recreation : both for walking or viewing nature. This provides an open, rural space between the built-up areas on the north, south and west of the Blàr Mór.
- ❖ Blàr Mór translates from the Gaelic as ‘big bog’, if this development were to proceed another piece of local culture and history would be lost.

B. Remarks on THC’s submission

THC 3.2

The level of mitigation quoted in the SEA does not appear adequate when compared with other developments involving blanket bog (of various qualities) in Lochaber. For example there is no mention of retaining any of the EU priority habitat active Blanket Bog. And why is shelter planting preferable mitigation compared with retaining native bog woodland ?

THC 3.3

I disagree with some of the THC comments. Good quality active blanket bog is limited in the Highland context and this blanket bog east of the A830 is in very good condition according to various peatland specialists. Its species diversity of plants and animals indicate that it has been less affected by burning, grazing, digging and other pressures which have lowered the ecological value of many peatlands in Lochaber.

THC 5.2

If development of this area were deemed vital, there would be ecological merit in retaining parts of the blanket bog wherever SUDS were required. The retained areas should not all be festooned with paths, what’s wrong with walking on heather and peat ? If paths are introduced this will degrade the native habitat as the verges would be cut and possibly planted with an amenity grass seed mix – thus introducing non-native species.

THC 5.4. and 6.2

I agree on the need for a detailed hydrological analysis and the requirement for significant SUDS systems. It is interesting to note that “ surface water drainage problems exist within the area at present”.

THC 8.1

The mitigation indicated in the available documents from THC would not be adequate to prevent significant adverse impacts on active Blanket Bog.

THC 8.2

The creation of swathes of cut grass (often non-native species are used,) with a scattering of planted standard trees would not nearly offset the loss of carbon or biodiversity which would result from the removal of the native active blanket bog habitat.

THC 8.3

Flat, low-lying ground covered in blanket bog at the head of estuaries is part of the West Highland landscape and here provides a visual ‘oasis’ in the surrounding urban areas. It also provides a stunning contrast for photographing the ‘Ben’ in a rural setting, its flatness emphasising the height of the hills and the habitats indicating the West Highland context.

C. My overall Conclusion

Maintaining the high quality of our environment, including space for the native Lochaber flora and fauna – especially where it is of international importance, should limit the extent of development in some places in order that features people enjoy are not spoiled by loss or interference. A sustainable section of the active Blanket Bog and Bog Woodland on the Blàr Mór should be retained undeveloped and should be conserved for the present and future generations to be able to appreciate this valuable habitat, the wildlife it supports, and the characteristic landscape it provides.
