

Councillor Bill Howatson  
Provost of Aberdeenshire  
Aberdeenshire Council  
Woodhill House  
Westburn Road  
Aberdeen  
AB16 5GB

4 October 2019

Dear Councillor Howatson,

I am writing to ask Aberdeenshire Council to carry out an urgent review of possibly unauthorised damage that has been inflicted on the Foveran Links Site of Special Scientific Interest.

I am policy and communications director at the Grantham Research Institute on Climate Change and the Environment at the London School of Economics and Political Science, a Fellow of the Geological Society and a Fellow of the Royal Geographical Society, but the contents of this letter represent my own professional opinion rather than the views of the institutions to which I am affiliated.

The citation for the Site identifies its extensive areas of mobile foreshore and sand dunes as well as fixed dunes, dune pasture, marshes and heath, as being "of exceptional importance for the study of a wide variety of coastal landforms and processes and its value is enhanced by the availability of extensive research results in other disciplines which provide much additional and complementary evidence relevant to solving a broad range of geomorphological problems".

In 2008, the Scottish Government granted, after a public local inquiry, an application by Trump International Golf Links Scotland Ltd (TIGLS) to develop a golf course on land at Menie House, Balmedie. The report of the inquiry acknowledged that the development would cause severe damage to part of the Foveran Links SSSI, but concluded that the destruction of the natural heritage would be justified by the potential economic benefits. However, the planning agreement explicitly specified conditions, including that TIGLS should take steps to limit environmental damage, for instance through regular monitoring and reporting in line with an environmental management plan and through acting on the advice of the Menie Environmental Management Group (MEMAG).

It is clear that TIGLS failed to comply fully with these conditions, in breach of the planning permission it was granted. It failed to provide regular reports and it unilaterally disbanded

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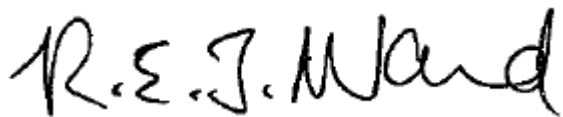
MEMAG in 2013. As a result, there can be no confidence that sufficient care was taken by TIGLS to avoid unnecessary damage to the SSSI. As you know, it is a criminal offence to cause unauthorised damage to a Site of Special Scientific Interest.

A recent review by Scottish Natural Heritage has revealed that the Foveran Links SSSI has been partially destroyed by the development of the golf course, and it is now considering the removal of its protected status.

It is worth noting that since the public local inquiry and the decision to allow the development of the golf course, a more complete understanding has emerged of the value of Scotland's natural capital and the benefits that features such as the Foveran Links SSSI offer in terms of recreation and heritage. At the same time, it is unclear that the promised economic benefits from the golf course have been realised. TIGLS has recorded substantial financial losses over the past few years.

In view of the fact that TIGLS has failed to comply fully with the conditions of the planning agreement and may have inflicted unauthorised damage to the Foveran Links SSSI, I urge Aberdeenshire Council to carry out a review of this case, and to ask Scottish Natural Heritage to suspend any decision on de-notification of the SSSI until the Council has completed its considerations.

Yours sincerely,

A handwritten signature in black ink that reads "R.E.J. Ward". The letters are cursive and connected, with a prominent flourish at the end of the word "Ward".

Bob Ward FGS FRGS