

British Lichen Society Closing Statement – Key Points

- Based on the UK's Guidelines for the Selection of Biological SSSIs (with lichens as a qualifying feature) – Loch Fleet SSSI is the second highest scoring coastal heath and sand dune site in the UK, with a score of 47 and far exceeding the threshold score of 20 at which a site should be considered for SSSI notification
- Using the same Guidelines, Coul Links alone (independently of Ferry Links) scores 37 – also well above the SSSI threshold and representing the fourth highest scoring coastal heath and sand dune site in the UK
- These facts underscore the national importance of Coul Links to UK lichen conservation and – as a red flag – we note that no sites with links golf courses meet the threshold score of 20 – we anticipate that there would be a very strong likelihood these exceptional scores would decline because of biodiversity loss if Coul Links is developed into a golf course

- Coul Links also includes populations of rare and threatened species, notably there are healthy populations of *Peltigera malacea* which is classified as Endangered (IUCN criteria), is a UK BAP species, and features for protection on the Scottish Biodiversity List
- Two of this species' largest recorded populations intersect with the footprint of the golf course
- Despite lichen survey being proposed as a planning condition, it was not carried out by the Applicant, so that this population loss is a minimum estimate; it is therefore not possible to give an accurate percentage for the overall loss of the species' populations because they intersect with the golf course footprint or spill-over effects
- However, the best current available information shows that all known populations of *P. malacea* at Coul Links become entrapped and separated from adjacent habitat on all sides, by fairways and greens which act as barriers to the dispersal of the species, and which represent a loss of ecological integrity
- For species such as *P. malacea* (and other coastal heath and dune species) which undergo frequent short-distance dispersal between ephemeral habitat patches (stabilising disturbed ground, before vascular plant succession) – this fragmentation of the site poses a direct threat to the species' long-term viability

- We emphasise that although action could be taken to improve the habitat status of Coul Links, in its current state it offers a strong foundation for the future protection of characteristic coastal heath and sand dune lichens, including rare, threatened and protected species
- In contrast, development of a golf course would fragment the site to severely compromise its ecological integrity and is considered by us to be a very high-risk action for which future mitigation is unquantified and – based on the denotification of Menie Links following golf course development – unlikely to succeed