### Application 23/00580/FUL Coul Links Planning Manager's conclusions

9. CONCLUSION

9.1 It is evident, that even with caution applied to the applicant’s assessment, that the

proposal does represent a significant development proposal for Sutherland with

substantial, albeit not unanimous, support locally and in planning terms there is broad

support for a development of this nature i.e. a proposal which has the capacity to

contribute to the Council’s overarching vision with regards tourism. Moreover, the

supporting information submitted with the application indicates that the development

has potential to create additional economic benefit which would result in increased

demand for accommodation and so forth. Such effects are likely to ‘trickle’ down

within the Sutherland area. In particular the proposal will add an additional golf

course to the Sutherland area which has the potential to extend the time visitors stay

in Sutherland.

9.2 Golf course development on the site was first mooted nine years ago and during that

period, the same concerns have remained with regards to impact on the natural

heritage and specifically the Site of Special Scientific Interest/Ramsar site covering

significant portions of the site. Ultimately this led to refusal of a previous application

and whilst the intentions of the applicant to address the concerns noted during PLI

are acknowledged, the revisions have fallen short of being able demonstrate.

9.3 The National Planning Framework is now embedded in the development plan setting

out an overarching ambition for Scotland to progress towards net zero, reducing its

climate emissions and in planning terms supporting suitably located proposals which

contribute to sustainable communities. NPF4 therefore reinforces the need to

consider the application in terms of its environmental credentials and in addition to

the concerns regarding the designated areas remaining, there is policy context

favouring developments where it can be demonstrated that the proposal will

conserve, restore and enhance biodiversity, including nature networks so they are in

a demonstrably better state than without intervention. The application has not been

able to demonstrate this as such biodiversity cannot be delivered within designated

areas and does not negate the negative impacts on the designations for which the

site is protected.

9.4 All relevant matters have been taken into account when appraising this application.

It is considered that the proposal does not accord with the principles and policies

contained within the Development Plan and is unacceptable in terms of applicable

material considerations.

9.5 Should the Committee be minded to support the application Members are reminded

the application would be referred to Scottish Ministers who have the opportunity to

call it in.

. . . .

11. RECOMMENDATION

. . . it is recommended to REFUSE the application for the following reasons:

1. The application is contrary to the provisions of National Planning Framework 4 Policy

4 (Natural Places) the Highland-wide Local Development Plan Policies 28 (Sustainable

Design) Policy 57 (Natural, Built and Cultural Heritage) as the proposed development

would result in a significantly detrimental impact on the Loch Fleet Site of Scientific

Interest and Loch Fleet Ramsar Site, designated for its sand dune habitat. In particular,

the Coul Links support some of the best quality SSSI dune slack habitats in Scotland

and the proposal, in its current format, will result in significant and permanent loss of

sand dune habitat, particularly dune heath and dune slacks and impacts to other

species which depend on it. Although mitigation is proposed the residual losses are

extensive and likely to be permanent. In addition, the proposed development will create

a high level of disruption to natural dune processes, such as dynamism, due to large

dune areas becoming stabilised. It will also result in significant levels of habitat

fragmentation, with the course infrastructure spread throughout the dune system.

Furthermore, translocation of habitat is unlikely to be successful and therefore not an

appropriate technique to safeguard a protected area of such natural environmental

complexity and notable dune quality.

2. The application is contrary to the provisions of National Planning Framework 4 Policy

3 (Biodiversity). In particular the proposal cannot be demonstrate that the proposal will

conserve, restore and enhance biodiversity, including nature networks so they are in a

demonstrably better state than without intervention. The proposal also fails to comply

with part b)i) which requires the proposal to be based on an understanding of the existing characteristics of the site and its local, regional and national ecological context

prior to development, including the presence of any irreplaceable habitats.

REASON FOR DECISION

All relevant matters have been taken into account when appraising this application.

It is considered that the proposal does not accord with the principles and policies

contained within the Development Plan and is unacceptable in terms of applicable

material considerations.

Signature:

Designation: Area Planning Manager North

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