**23/00580/FUL Design and Access statement (transcript of PDF)**

**Introduction**

The proposal represents a revised scheme for the development of an 18-hole golf course on land at Coul, to the north of the village of Embo near Dornoch in Sutherland. The proposal is based on a collaboration between the local landowner, Coul

Enterprises, and the local communities, Communities for Coul (C4C).

The objective is to create a world-class course that will attract International visitors while bringing added opportunities for UK-based golfers. Existing golf facilities within Highland, including Dornoch to the south and Brora to the north, draw visitors, a

significant number of which do not stay and continue to travel elsewhere for accommodation and overnight faciliies. This course creates an opportunity to extend the length of visitor stay, enhance the golfing opportunities on offer to the north of those offered further south, at St Andrews and concentrated around Fife, and to

contribute towards enhancing the golfing destinations that the Highlands can offer.

Increasing visitor stay brings considerable benefits to the local economy and has the potential to address the acknowledged loss of visitors who play the available courses but stay elsewhere, often outwith the Highlands.

This revised layout is proposed only after detailed consideration of the factors that led to the previous Scottish Ministers' decision to refuse planning permission.

**Proposal**

The proposal seeks to develop an 18-hole links golf course on land at Coul. The scheme, in summary, comprises the following:

18 hole golf course

 Change of use of exising buildings to provide Golf Club faciliies

 Car parking

 Access road

 Associated infrastructure

This proposal will embrace the natural features, landscape, and high ecological value of the area and develop a course where the design and layout is determined by the exising topography. It is a symbiotic development, combining biodiversity net gain while developing a world class golf links facility and creaing a golf cluster together with the existing courses nearby. Management of the entire 317.7 hectares included in the application site boundary will be executed in line with NatureScot recommendations. It serves to adress the evident deterioration of the dune system while endorsing those features for which the site is recognised through the national and international designations.

This proposal introduces significant changes when compared to the previous application. It involves a much reduced footprint of development with only 1.5 ha of direct habitat loss and a corresponding reduction in the need to alter the landform or introduce ‘alien’ features such as engineered footpaths, translocation of vegetation, construction on site etc. All of this is directed at addressing the previous concerns and developing a course that delivers biodiversity net gain.

The design and layout of the proposed course is dictated by the exising topography and avoidance of the idenified areas of high sensitivity. Mowing the fairways, roughs, paths

etc. with new planting required only on the tees and greens, significantly reduces the scope and extent of intervention.

It embraces the principles of a true links course, using the natural landforms and topography as the guiding principles in achieving a challenging golf course that will meet the objectives of securing world class status. The benefits of golf clusters are recognized. Fife, East Lothian and Ayrshire demonstrate the catalyst these bring to enrichment of the area.

This proposal is based on extensive studies, undertaken by the team, of exising links courses within SSSI’s, and has enabled a considered approach, embracing the good practices adopted elsewhere, that meet, in particular, NatureScot and RSPB objectives.

**Background**

A previous planning proposal for the development of an 18-hole-links golf course was the subject of detailed assessment and consideration, involving extensive analysis

encompassed within the accompanying Environmental Impact Assessment Report.

The proposal was granted planning permission by Highland Council but, following a ‘call in’ by Scottish Ministers and a lengthy public local inquiry, was subsequently refused

planning permission.

In summary, the overriding objective was based on ecological and environmental considerations notwithstanding the recognition given towards the economic benefits such a proposal would bring to the area. It is against this decision that the current proposal is to be submitted: seeking to address the main concerns and objections raised by Scottish Ministers and to demonstrate that the development will bring benefits to the ecology of the area, maintaining the dynamism of the dune system, rather than the negative impacts previously identified.

**Design**

The design of the course has therefore adjusted and evolved embracing tried and tested techniques used on other courses also within SSSI’s. It is recognized by NatureScot and local residents that action is required if the area is to be protected and its special features conserved for future generations. Many of the objections to the earlier application made comparisons to the Menie Estate golf development. Nothing could be further from the design of this proposal. There is no comparison to be made. This course is designed to work with the topography, habitats and is guided by NatureScot objecives. It seeks to reverse decline and secure Biodiversity Net Gain.

The Location Plan illustrates the area involved. It extends in total to some xx hectares but with only …………….hectares involved in the actual golf course. The site extends west from the dune system that defines the North Sea foreshore and to the east of the old railway line. It comprises a stable dune system with areas of trees, scrub, bracken, and felled woodland. This part of the site is also grazed by cattle. The central part of the site immediately west and south of the route of the old railway line comprises improved pasture that has been used for sheep grazing. The land in the southwestern part of the site comprises rough pasture with patches of scrub, heather, and woodland.

As detailed in the drawings, much of the site is also designated as being of internaional and European importance as part of the Dornoch Firth and Loch Fleet RAMSAR site and Dornoch Firth and Loch Fleet Special Protection Area (SPA) respectively, and is of

national importance as part of the Loch Fleet site of scientific interest (SSSI).

To the west, and outwith the special designations, the existing farmhouse and associated buildings are situated. These provide an opportunity to provide the facilities required to manage the golf course including clubhouse, maintenance facilities, and equipment storage. A golf pro shop will also be accommodated within the existing buildings.

The application will include a change of use of these buildings but not details of the conversion which will be dealt with under a further, separate applicaion. Drainage details associated with the conversion of the buildings will however be incorporated within this proposal. The proposed car park is located to the west of the exising

buildings.

**Communities for Coul Ltd – C4C**

The applicants are committed to delivering a world-class golf course that will bring benefits to the area and support the local communities. C4C is a locally based community group, formed in January 2021, mandated to deliver the course. It is a collaborative group of local residents representing Brora, Golspie, Embo, Dornoch and Tain. Before embarking on the project, nearly 5000 residents were consulted through a Civica Ballot and of the 43% respondents, some 70% responded in favour of the development of a course. This reflects the importance placed by local residents on delivering an environmentally appropriate course that will serve the local community and bring much needed economic benefits.

C4C has long recognised that existing courses within the area are frequently at capacity with potential spend and visitor stay lost. This proposal will address that shortfall.

**Infrastructure**

Foul Drainage Arrangements

The proposal for the disposal of wastewater was developed with the previous application and was consented to by SEPA. This proposal will build on the previous approvals.

Wastewater (foul) from the development (clubhouse only) is to be directed to a septic tank for primary, secondary, and tertiary treatment (separate plant), before discharge to a reedbed for further treatment, and subsequent discharge of the treated flows to a drainage ditch on the northern perimeter.

Infrastructure

The perimeter ditch follows a tortuous route to discharge into Loch Fleet. The reedbed is largely superficial but maintains the inflow and ouflow pipework at slopes slightly

greater than minimum gradients. Although built to Scottish Water requirements, it is considered unlikely that the system will be adopted. This does not diminish its suitability for the site.

The outputs from the treatment tank (upstream of the reedbed) are within the prescribed minimum water quality limits set within the CAR Licence to maintain reasonable water quality in the ditch and subsequent discharge quality into Loch Fleet.

The current CAR license places limiting restrictions on the volume of flows that can be directed to the wastewater treatment plant, which equated to foul flows from the

Clubhouse only. Flows over these would need to go to flow sewer- the nearest is Embo.

Surface Water arrangements

The surface water (discharge from building roofs and roads and hardstanding) would go to the ground - SUDs. Surface Water discharge from working areas, such as plant workshops and associated hardstanding would be isolated and directed to the wastewater treatment facility through an oil interceptor. These working areas would be isolated from adjacent areas to prevent clean runoff from penetrating these areas and (possibly) becoming contaminated with silts and oils etc.

Please also refer to Appendices for additional details.

**Access**

The exising access will continue to serve the exising Coul Farmhouse which is not included within the proposal. A new dedicated access is proposed to the west of the

site and will adjoin the public road network. The previous application supported this option. The revised design and course layout has a corresponding reduction in the

need for extensive on site construction. This will reduce the need for construction traffic, limiting it to small-scale diggers and those associated with the construction of site infrastructure including drainage and road construction.

The site includes the former rail line. This is a Core Path and provides access to the north towards Loch Fleet and to the south towards Embo and Dornoch. The section contained within the site boundary will not be affected by the development. Construction is unlikely to impact on continued use but alternative measures, in

discussion with Highland Council, will be put in place should this be necessary.

Informal access along the foreshore is unaffected by the golf course development. Evidence of informal tracks through the dunes demonstrates some use by walkers

etc. In accordance with Outdoor Access legislaion, the public will not be prevented from accessing the site although opportunites for defining appropriate access will be undertaken in discussion with the Council’s Access Officers.

**Golf Course & SSSI Status**

This proposal has studied the existing and developing golf courses located within SSIs and other designations including RAMSAR and SPAs. There are over 220 golf courses located within SSSI status areas. There are therefore many examples that demonstrate that development of a course within these designations brings benefits. It enhances the habitat and biodiversity of the site. Development can improve the SSSI status from declining to improving. Golf courses fund the long term management of these sites and benefit from the experienced and engaged labour to carry out tasks appropri-

ately and with due diligence.

It is also relevant to consider the positive impact a course will bring to a SSSI, with all but a few of the SSSIs designated after the Golf courses were established. This serves to highlight the positive work that golf courses do to bring benefits to the ecology of an area.

**Landscape and Visual Impact**

Consideration has been given to the visual impact of the course in this location. The reduction in the extent of the changes to the topography of the existing dunes, dune slacks and vegetation will limit the visual impact.

**Design & Construction**

Design

The course design has altered and is based on a detailed analysis of the site including habitats, species, SSSI designation, proximity to the coastal margins and topography.

This has guided a very different approach to the earlier proposal and demonstrates the ability to design a course that both attains a layout that reflects the best in a traditional links course with one that recognises that development must acknowledge the special qualities of the site. The iterative process in determining the form and scope of the course now proposed has embraced the principles applied successfully elsewhere in Scotland within designated SSSI’s. These have included nearby Skibo Castle Golf Course where recent activity has involved removal of large areas of gorse and scrub. Other similar courses include at Machrihanish where the dune heath has enhanced due to the planned intervenion associated with the golf development. By working with the landscape and avoiding all but minimal change to exising landforms and structures, the following benefits will be secured:

avoidance of Dune slacks through micro siting

avoidance of Juniper through micro siting

avoidance of lichens through micro siting

avoidance of removing Fonseca fly habitats

avoidance of all but a small amount of translocation

reduction in water usage by 80%

reduction in ferilizer usage by 80%

reduction in construction disturbance

reduction in habitat loss as mowing is modified

reduction in construction traffic

The revised construction and maintenance methodology identified within the Golf Course Management Plan, will introduce the following benefits:

create and improve lichen habitat by removing gorse from the roots

expand and enhance lichen interests

create open sandy areas

angle blade mowing to avoid edge effect

no fertiliser on fairways

reduce the need for irrigation

remove invasive gorse and the debris

remove invasive birch and remove the debris

remove invasive bracken and remove the debris

remove meadowsweet

remove the debris that is contributing to nitrification of the dune slacks in particular

**Demand**

The demand for golf has grown substantially since the pandemic. This demand partly stems from the physical and mental health benefits that it brings. Increased demand

has added to the pressure on existing faciliies. Such was the demand on tee times, Royal Dornoch had to close its bookings for the entirety of 2022 in March of that year.

Golspie, Brora and Tain golf courses have also experienced substanial increases in bookings. Increased demand for golf has spread worldwide. For example, in Norway, golf course bookings doubled between May 2019 and May 2020. Scotland is the home of golf and paricularly links golf. The national and international demand for the links

experience is substantial and growing with the game. Coul Links provides an opportunity to expand Scotland’s links golf repertoire, and create a golf cluster to deliver on the Scottish Government's stated objecive of Rural Revitalisation within the designated North regions.

The course is designed to avoid the more sensitive areas previously identified, paricularly at holes 4 and 16.

Other benefits include removal of the former coniferous plantation, creation of new water bodies within the proposed borrow pits that are located on the existing fields to the west of the site, reintroduce instability within an increasingly stable dune environment and to avoid the areas around the coastal margins at Loch Fleet and the east coast. Extensive survey work included within the EIAR confirms that waders and

overwintering birds will not be impacted by the proposal.

**Ecology and Course Design**

Between the ime of the 2016 NVC survey and its update in 2021, there has been considerable change in the design of the course and the vegetation of Coul Links. The proposed redesign reduces the course footprint and its influence on habitats & species, and the management plan will promote maintenance of instability. Vegetation change has seen an increasing dominance by a small number of invasive species, to the detriment of the semi-natural features.

The course redesign involves a smaller, more fragmentary course and a graduated interface with the surrounding habitats. This reduces the loss and disconnection of habitats and species populations. Furthermore, a reduction of management inputs (fertilisers, pesticides & non-native seed) diminishes the potential for an extension of effects from the direct footprint of the course. Some repositioning of the course also avoids the most sensitive habitats, juniper & lichen species.

Habitat management associated with the course will enhance connectivity and habitat quality through the reduction of invasive species extent (burnet rose, gorse, grasses,

meadowsweet and birch scrub) that otherwise displaces, modifies and/or disconnects the semi-natural features. A "stability of instability" will also be implemented by this process as well as modificaion of slopes to encourage slippage and exposure of bare sand.

As a result, early successional stages will be provided with new opportunities to enhance the biodiversity and functioning of the dunes in the face of a rising tide of stasis and atrophy.

**Existing Buildings**

The proposal brings benefits and will repurpose the exising Coul farm buildings.

These are no longer required for the operaion of the farm and provide an excel-

lent opportunity to redevelop for the necessary golf related faciliies including a

clubhouse, maintenance and storage areas, member facilities and staff accommo-

dation. The buildings are of traditional form and style, of quality local materials and lend themselves to sensitive upgrade and long term protection.