



PRESS RELEASE 23<sup>rd</sup> May 2018

## Top dune ecologist says golf plan 'full of holes'

Not Coul, the local opposition group against controversial plans for a championship golf course at Coul Links, has submitted a further objection to the proposals. Dr Tom Dargie, chair of the group and leading dune expert, has highlighted a catalogue of errors from the Environmental Statement, which he claims is 'seriously flawed'.

New survey work checking the ES has revealed numerous habitats and species that have either been missed, wrongly identified or not mapped.

Tom Dargie from Not Coul said, *'The ES environmental survey work is seriously flawed, our expert analysis found less than 50% of the habitats is accurately mapped. That work underpins a lot of golf course design plus key impact calculation on ecology and hydrology. This calls in to question how much reliance the Council can place on the many submitted planning documents, based on information which is clearly not fit for purpose'*

Furthermore, a recent visit by the British Lichen Society found great species interest in Coul dune heath, missed by ES environmental survey. The BLS work revealed that Loch Fleet SSSI can now be regarded as the number one dune lichen site in the UK. Large areas of dune heath are proposed to be moved using a controversial technique called translocation. Scottish Natural Heritage has already advised The Highland Council that this method *"is unlikely to be successful and therefore is not an appropriate management technique to safeguard a protected area of such natural environmental complexity and notable dune quality."*

Sandy Coppins of the British Lichen Society said: *"The lichens on Coul Links are a really special part of the dunes. They have evolved with this habitat over the centuries, adding to the diversity and delight of the place. Much of the site is still unexplored and more species can be expected to be found there. It is concerning that the footprints of the proposed golf greens, fairways and access tracks coincide with some key areas of high lichen interest."*

The planning application is expected to be decided by the Highland Council early next month.

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### NOTES TO EDITORS

- Not Coul is an unincorporated group of Third Party objectors, opposing September 2017 plans which were submitted to Highland Council for an 18-hole golf course on the site (application reference 17/04601/FUL) by a group of developers led by US millionaires Mike Keiser and Todd Warnock.
- Coul Links a stretch of coastline in East Sutherland, near the village of Embo. It is protected for its rare dune habitats and wildlife by national (Site of Special Scientific Interest), European (Special Protection Area) and international (Ramsar) designations.
- Coul Links is home to more than 1,200 species including the extremely rare Fonseca's Seed Fly, which is restricted worldwide to this stretch of coastline.
- Scottish Natural Heritage and a group of organisations, including RSPB Scotland, The Scottish Wildlife Trust and National Trust for Scotland, have objected to the proposal on the basis that it runs contrary to the Scottish Planning Policy (SPP), compromising the environmental integrity of the site.

- The developers claim that "less than 2%" of the site will be affected and that mitigation measures will lead to biodiversity net gain. Coul is part of the very large Loch Fleet SSSI which is 80% tidal mud and sand. In fact, the negative impact on land habitat is very extensive and analysis by Scottish Natural Heritage shows large losses of dune heath, dune grassland and dune wetland would occur. SNH also considers that mitigation by moving different habitat as turf – translocation - “ *is unlikely to be successful and therefore is not an appropriate management technique to safeguard a protected area of such natural environmental complexity and notable dune quality.*” Overall, SNH considers that “*adverse impacts will still greatly outweigh any benefits for the sand dune habitat*”.

- The developers claim overwhelming local support, even though consultations held in Embo and Dornoch to poll support were only attended by around 10% of the local population. 1,467 objections have to date been lodged with Highland Council versus 342 support comments. Almost 90,000 people have signed a UK petition against the development, while a petition supporting it closed with 606 signatures.

Further information:

<https://wam.highland.gov.uk/wam/applicationDetails.do?activeTab=summary&keyVal=OX10GYIHH0I00>

[www.coullinksgolf.com](http://www.coullinksgolf.com)

<http://www.notcoul.com/home.html>

Not Coul Further Objection in full:

<http://nebula.wsimg.com/32fbad7f9da4f8bc6d733ba4dcab31dc?AccessKeyId=EDC827D8AD8BC3E385FC&disposition=0&alloworigin=1>

<https://you.38degrees.org.uk/petitions/conserves-coul-links-for-nature-not-golf-1>

#### **Attachments:**

- Not Coul report on flaws in developer environmental information (part of Further Objection)
- Not Coul table comparing treatment and judgement of different types of environmental information by applicant and Not Coul/other expert groups (part of Further Objection)
- British Lichen Society submission to Highland Council
- Image (no photo credit required) – larger version can be supplied

**Please direct all press enquires and requests for comment to Not Coul:**

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