



PRESS RELEASE

21 December 2017

GOLF COURSE PROPOSAL “GROSSLY UNDERESTIMATES ENVIRONMENTAL DAMAGE WHILE EXAGGERATING LIKELY ECONOMIC GAINS.”

Not Coul is a group of Dornoch and Embo residents working together with their advisers to oppose an application for Planning Permission for the construction of a golf course on an area of highly protected sand dunes in Northern Scotland, called Coul Links.

Following months of painstaking research, field work and analysis, the *Not Coul* group today submitted its detailed objection to Highland Council. Key aspects of the objection, which runs to more than 150 pages, include:

- A summary of Planning Policy provisions which are contravened by the application
- Detailed evidence showing how the environmental surveys and studies carried out by the developers are of such poor quality that they are not fit for purpose and simply cannot be used to make an accurate assessment of likely environmental impacts.
- As a consequence, the developers have significantly underestimated the environmental effects of the proposed golf course.
- An alternative evidence-based assessment submitted by experts as part of the *Not Coul* objection finds that:
 - o The golf course would be extremely damaging to the environmental integrity of dunes at Coul protected by SSSI/SPA/Ramsar designations.
 - o Developer claims that the golf course would result a Biodiversity Net Gain are incorrect. The proposed course will instead lead to significant biodiversity loss.
 - o Developer claims that Coul Links has major issues with invasive species are also incorrect. There is only minor invasion by gorse and birch in some dune heath.
 - o The developer’s proposed environmental mitigation measures would be ineffective.
 - o The Environmental Statement is not a fair attempt to identify likely significant impacts. It should be withdrawn, and done again.

- An independent study by one of the Highlands' leading economists shows that the economic benefits of the development could be only a fraction of that promised by the developers. They claim 444 jobs could be created across Scotland in five years, whereas the new study shows that number could be as low as 62 jobs - i.e. about a seventh of the developer's estimate.

Not Coul's Chairman, Dr Tom Dargie, said: "The developers have grossly underestimated the level of likely environmental damage, while seriously overestimating any economic benefits. Unfortunately, their Environmental Statement and accompanying Planning and Economics reports stray some distance from practical reality, and in our opinion cannot be relied upon. They would provide a very poor basis for a detailed Planning Permission, even one subject to conditions.

The detailed scientific assessment presented in our objection brings the developer's incorrect information and exaggerated claims out into the open for all to see. It puts to bed once-and-for-all the frankly ridiculous idea that bulldozing protected sand dunes to construct a golf course could "protect" the formally designated interests at Coul Links and somehow produce a biodiversity net gain.

The developer's plans have been steadily unravelling over the past few weeks, with strong and informed objections from SNH and SEPA and with measured public opinion now being at least 3:1 against the development, following more than 1,000 formal objections from the public to The Highland Council, and more than 85,000 objections in an online Petition.

We've always suspected that the developer's economic claims were exaggerated. The jobs they promise represents about one third to one quarter of the total number of golf tourism jobs in Scotland. To suggest that one additional golf course could have that level of impact is clearly preposterous.

The most frustrating thing in all of this is that a better solution is staring the developers in the face. An environmentally-sensitive golf course could be constructed at Coul, away from the protected areas and the beach-front, about 450m back from the dunes and beaches. The land there is owned by one of the developers and is part of the planning application. The views would be better, with construction much easier and less contentious. Such a course could be built in the same way as Castle Stuart, which did not require the destruction of natural links and, as is well known, is now a very successful championship-standard course.

Not Coul's opinion is that "It would be a serious mistake for the developers not to have considered this revision to the course layout. If they have – and there is no sign of it at present - then we'd ask them to stop wasting everyone's time and tax payers money, and put forward a more sensible proposal."

Not Coul has recommended to The Highland Council that this application should be unambiguously refused.

[END]

The full *Not Coul* objection and supporting evidence is available on request, and will be on THC's and *Not Coul's* websites as soon as possible.

It includes:

- A short review of relevant planning policies and law
- A detailed environmental and ecological assessment by Dr Tom Dargie
- A landscape and visual impact Preliminary Review by Mark Steele Consultants
- An Economics report by Dr Steve Westbrook