

INTERNATIONAL OTTER SURVIVAL FUND

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28 November 2017

Dear Sirs

**Planning Application 17/-04601/FUL: Land 1700m NW of Embo Community Centre, School Street, Embo**

I am writing to lodge a formal OBJECTION to the proposed golf course at Coul Links on the following grounds:

- 1. Otters:** We see from the Environmental Impact Assessment that no signs were found that otters are currently using the area and that a pre-construction survey should be carried out. This survey was carried out in summer 2016. However, we know from previous records that spraint and tracks are regularly found right across the site, particularly along the burn north of Embo and we have been given details of spraint found in the area in November 2017. It is clearly therefore an important area for otters.
- 2. “The Fate of Pesticides and Fertilisers in Turfgrass Situations”:** In this document it compares the amount of nitrogen fertilisers used on a typical golf course with an area of intensive agriculture. This is totally irrelevant in the case of Coul Links as it is not under intensive agriculture but a natural dune system and therefore there are no fertilisers in use.
- 3. Water Use:** Clearly there will need to be water extraction to allow watering of the course and we understand that there is another planning application before the Council for a reservoir to supply water for this. This is outside the boundaries of the SSSI and therefore again it shows the impact of this development is not confined to the actual course site. There seems to have been no indication of the need for a reservoir in the initial application.
- 4. Dornoch and Loch Fleet SPA:** As the Scottish Wildlife Trust have pointed out the repercussions of this development are much wider than the actual land area of the site. Drainage, water extraction, erosion, use of pesticides/nutrients, etc will have a major impact on the whole area of Coul Links. So this MUST be taken into account when considering the application.
- 5. Protected Area Status:** We have already mentioned the area is listed as an SPA but it is also recognised as a Ramsar site and an SSSI to protect the dunes, rare habitats and wildlife.
- 6. Dune System:** This is a natural environment with its associated flora and fauna, some of which are rare. The nature of a dune system is that it is ever-changing and migratory – the stabilisation of the dunes by trees and the actual golf course will change the habitat completely.
- 7. Over-provision of facilities:** We all accept that golf is a very popular sport but if there are already 30 courses within a radius of 30 miles of the proposed site, then surely that is enough. We can see no evidence that these existing courses are so heavily in demand that there is a need for an extra facility – indeed if this course is constructed it will surely take business from the others.
- 8. Poor Track Record:** In urban areas golf courses can provide a “green” area where people can walk as well as play golf. However, evidence has recently come to light that they are

not as environmental as is portrayed. Residents near Trump's golf course in Aberdeenshire are opposing his expansion plans largely based on how Phase 1 has turned out.

There have been a number of letters of support for the proposal largely based on the expected economic impact on the area, but is this a realistic benefit. Of course, people will come to play golf which will bring financial benefit to hotels and other tourist businesses. It will provide jobs in an area where there are not many opportunities. But how many people visit the area already for its wildness and natural beauty and will they feel that they no longer want to visit when it changes. They too provide a financial benefit through tourism and this may be lost. Will the benefits of the golf course outweigh these losses?

Furthermore, it was reported in the Washington Post that Trump's two golf courses in Scotland had lost £24million in 2016 – this is based on figures supplied to the UK Government. Is this what is wanted in Embo and the area?

Whilst we can fully understand that there is a need for more jobs and economic security of the area this cannot be at the expense of the environment, the wildlife, and existing jobs. It would be better to work to employ more people in conserving the environment and encourage visitors to enjoy those natural facilities.

Yours faithfully



Grace Yoxon  
Director



Wildlife Conservation Award Winner,  
British Animal Honours 2013



IFAW Animal Action Award Winner 2012

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Patron: Julian Pettifer. Joint Presidents: Laurence Broderick, Dennis Furnell. Head of Operations: Dr Paul Yoxon



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