

Protecting Scotland's wildlife for the future

FAO Gillian Pearson
Planning and Building Standards
The Highland Council

By email to: gillian.pearson@highland.gov.uk



13 April 2022

Dear Ms Pearson,

22/01330/SCOP | Construction and Operation of an 18-hole golf course, construction and operation of a par 3 golf course, practice area, clubhouse, parking, paths and ancillary infrastructure. | Land 1700M NW Of Embo Community Centre School Street Embo

Thank you for the chance to comment on the above-named application at scoping stage. We would like to object to the proposal.

The Scottish Wildlife Trust corresponded frequently over the previous application to develop the protected site at Coul Links and noted the ultimate refusal of the application by the Scottish Ministers in early 2020. Our previous response can be viewed [here](#).

We note that the Scoping report states that key changes include a “*reduced area of the actual golf course*”, however, when viewing the map included in the scoping documents the proposed site looks to be the same. Particularly the area within the SSSI looks to be very similar. We would seek further clarity around what is meant here.

Our Policy on the planning System states that “*Internationally, nationally and locally designated sites are a key mechanism for identifying important areas for biodiversity. The Planning System should act to protect and safeguard designated sites from inappropriate development, damaging operations or other impacts.*” And we believe developing a golf course on, even a part of, a Site of Special Scientific Interest, Ramsar wetland and a Special Protection Area will damage this heavily protected site.

We understand that attempts have been made to address environmental concerns that were previously raised. Given the time lapsed since ecological surveys had taken place, we would need to see all of these repeated for the Environmental Impact Assessment.

We note that irrigation is proposed to be facilitated by a bore hole, given that hydrological impacts to the wetland ecosystem were such a key concern with the previous application, we would want to see evidence provided that groundwater levels will not be impacted.

The Trust recently submitted a full response to the Scottish Government consultation on the National Planning Framework 4 which can be seen [here](#). This is a hugely important and powerful document and essentially sets policy on planning for the next decade. The draft NPF4 states that “*To achieve a net zero, nature-positive Scotland, we must rebalance our planning system so that climate change and nature recovery are the primary*

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It is also a company limited by guarantee and registered in Scotland (registered no. SC040247).

guiding principles for all our plans and all our decisions". From the detail we can currently see we do not think the proposal is consistent with this ambition.

Thank you in advance for considering our concerns.

Yours sincerely,



Jo Pike

Chief Executive

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