

## **Biodiversity Net Gain at Coul Links**

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## Background

In light of the development of best practice guidance and principles with regard to Biodiversity Net Gain (BNG) and planning in the UK<sup>1</sup>, the Coul Links team has agreed to provide Scottish Natural Heritage (SNH) with a summary of BNG proposed at Coul Links. Specific details will be presented in full in the Environmental Statement (ES), but in the meantime this is a summary of proposed BNG the project will deliver. It is important to note that the ES will report these BNG elements as *committed mitigation measures* (so they can be controlled through planning conditions). Further, we anticipate these measures will be developed, implemented and monitored in agreement with SNH and independent ecological advisors.

A range of ecological and ornithological surveys have been carried out at Coul Links since 2015. Substantial areas of the proposed golf course at Coul Links form part of formally designated nature conservation sites, namely the Loch Fleet Site of Special Scientific Interest (SSSI), Dornoch Firth and Loch Fleet Special Protection Area (SPA) and Ramsar site and Loch Fleet National Nature Reserve. We have reviewed in detail the SNH Site Condition Monitoring Statements/Reports for these designated sites and used them to identify and inform the main proposed BNG work areas towards SNH defined priorities.

The proposed 18-hole golf course at Coul Links will be placed within a 317.7ha Coul Links Study Area (CLSA) upon which the developers intend to establish a 'conservation easement' under which a detailed long-term site management plan will be established in conjunction with land-owners and SNH (see section 3 below for more details). The goal of the conservation easement is to expand and strengthen the long-term conservation management of Coul Links, funded by the golf course. The CLSA is located both within and outside the Loch Fleet SSSI. The CLSA includes 172.9ha not in the SSSI of which 14.3ha is ecologically consistent with the SSSI and will be managed as such. The current proposed layout includes turfed areas of the course (tees, greens and fairways) of approximately 30.7ha of which only 20.0ha is contained within the SSSI, representing 1.6% of the total SSSI area.

## Measures to deliver BNG at Coul Links

### 1. Cessation of winter shooting of Special Protection Area (SPA) wildfowl at Coul Links

Bird surveys at Coul Links were conducted in winter 2015-2016 because Dornoch Firth and Loch Fleet SPA species were potentially present within the proposed development area. However, the only SPA species recorded during these targeted surveys using the dune slack habitats in the winter at Coul Links were teal *Anas crecca* (present regularly) and wigeon *Anas penelope* (present occasionally).

The Coul Links landowner currently exercises their legal right to shoot wildfowl (including teal and wigeon from the SPA) on Coul Links SSSI; numbers killed vary annually, but usually several dozen are shot each winter. This activity has taken place at Coul Links over many years during the winter shooting season. In winter 2015-2016, bird surveyors noted that the wildfowl recorded in wetted areas (teal, mallard *Anas platyrhynchos* and wigeon) were very wary of humans, taking flight at hundreds of metres distance from the observer. Under the recommendation of Alba Ecology and in discussion with the landowner, shooting of these SPA/SSSI birds (indeed all wildfowl shooting) would cease within the entirety of the CLSA if planning consent was granted for the lifetime of the proposed golf course at Coul Links. This would lead to two immediate significant ornithological benefits.

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<sup>1</sup> CIRIA, CIEEM and IEMA, 2016. Biodiversity Net Gain: Good practice principles for development.

- Firstly, teal and widgeon from the SPA/SSSI would no longer be shot and killed, resulting in greater winter survival of both these species within the SPA/SSSI (impact - a reduction in direct mortality).
- Secondly, the disturbance to SPA/SSSI wildfowl associated with wildfowl shooting throughout the winter would no longer take place (which causes the birds to expend valuable energy looking for 'safe areas' elsewhere to rest and feed). Studies have shown that regular disturbance to wildfowl causes these birds to lose weight through increased energy use, resulting in lower fitness and overall winter survival, i.e. once shooting of the SPA/SSSI wildfowl ceases, these birds will find sanctuary during the winter within the wetted areas at Coul Links, rather than danger (impact - a reduction in indirect mortality).

Over time, it is considered highly likely that the population of wintering SPA/SSSI wildfowl using Coul Links will increase substantially as the birds learn that Coul Links is neither dangerous nor disturbed. Thus, the likely value of the Coul Links for SPA/SSSI wintering wildfowl is predicted to increase substantially in the long-term with the development of the golf course.

The main uncertainty associated with this proposal relates to the replacement of shooting related disturbance with potential golf related disturbance. Following discussions with the Coul Links team, they are willing to close the golf course during the winter months when SPA/SSSI birds use the wetted dune slack habitats. Based on ornithological monitoring, the dune slacks are typically wetted between December and the end of March. Thus, it is proposed that the golf course will be closed to the golfers during these months and only be operational outwith these months (i.e. April-November).

**One of SNH's Loch Fleet SSSI Site Management Statement Management Objectives is 'To maintain non-breeding populations of waterfowl and avoid significant disturbance'. These BNG proposals to cease wildfowl shooting during the non-breeding season will help deliver this SSSI Management Objective.**

In short, if the proposed golf course is not built the status quo, i.e. the winter shooting and disturbance of SPA/SSSI wildfowl, will continue indefinitely. If the golf course is built, it provides a guaranteed mechanism to stop the shooting of SPA/SSSI wildfowl and associated disturbance for the lifetime of the golf course; in effect creating a wildfowl sanctuary at Coul Links during each winter when the birds are present. Within the context of the ES, the cessation of shooting and the unambiguous BNG benefits it would bring to SPA/SSSI waterfowl would be considered a likely moderate<sup>2</sup> significant positive impact/effect for the designated sites.

## **2. Remediation, control and long-term management of invasive plant species at Coul Links**

Parts of Coul Links, specifically (but not exclusively) the south and southwest, have had substantial increases in invasive species cover since SSSI designation and monitoring began. For example, the SNH Site Management Statement reports that "*Tree saplings (e.g. Scots pine, birch and willow) and gorse encroachment of the dune habitats has been causing gradual modification of the dune system*"<sup>3</sup>. Furthermore, detailed analysis of aerial images by Alba Ecology have shown that in 1988 there was ca. 1.83ha of bracken *Pteridium aquilinum* and the expansion has continued with 3.66ha of bracken in 2016, an increase of 100%. This invasive species expansion has adversely affected several of the SSSI featured habitats at Coul Links, including composite flower-rich areas of potential importance to

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<sup>2</sup> Moderate level of magnitude/change is defined as likely to affect 10-49% of this SSSI population at Coul Links.

<sup>3</sup> SNH. Loch Fleet SSSI Site Management Statement.

Fonseca's seed-fly (see section 6). Consequently, control and management of the large area of invasive species at south and southwest end of Coul Links, both within and outside of SSSI, will be beneficial.

Gorse *Ulex europaeus* is encroaching the Coul Links sand dune system and has resulted in modification and an unfavourable condition of the sand dunes<sup>4</sup>. Targeted removal of gorse bushes could be achieved through burning or cutting to ground level. The stumps could be removed by mechanical digging, or by treating the stumps with an approved, target herbicide which can effectively kill the root stock with much less ground disturbance. The proposed plan is not to remove all gorse bushes, as they provide nest sites for some of the SSSI bird species, but to substantially reduce the area of gorse. Proposed site management will halt further expansion of gorse onto sensitive habitats. The exact methods of gorse control/removal will be discussed and agreed with SNH.

Rosebay willowherb *Chamaenerion angustifolium* is found extensively in the south of the study area. This species can be controlled effectively with the use of targeted herbicides, although other non-chemical options are also available including cutting and burning. The exact methods of rosebay willowherb control/removal will be discussed and agreed with SNH.

The Loch Fleet SSSI citation states that thistles are an invasive species within the SSSI<sup>5</sup> and feature as part of the reasoning for the unfavourable status for the sand dunes. Marsh thistle *Cirsium palustre*, spear thistle *Cirsium vulgare* and creeping thistle *Cirsium arvense* are present in the study area, usually as individuals within grassland habitats. Removal would likely be by hand, but there are also targeted chemical herbicides which work on thistles too. The exact methods of thistle control/removal will be discussed and agreed with SNH and could be delayed until results of the Fonseca's seed-fly PhD study are available, in case the studies identify thistles as important flowers for the species (see section 6).

Tree saplings – The Loch Fleet SSSI Management Plan states that tree saplings (Scots pine *Pinus sylvestris*, birch *Betula spp.* and willow *Salix spp.*) are gradually modifying the Coul Links dune habitats. Continued removal of these tree saplings could be beneficial. However, woodland is part of the successional changes that naturally take place over time and indeed the presence of some native woodland within the SSSI is one of the reasons for wider site designation. Thus, management and control of regenerating trees, rather than eradication will be beneficial and agreed with SNH.

The evidence available indicates that all the invasive species noted are continuing to expand within the SSSI. Importantly, adjacent but outside the SSSI to the south, namely 7.2ha of land south of the southern burn to Embo (see Figure 1) is considered particularly important as it currently contains some areas of good dune habitat and is also the source of much of the invasive species within the SSSI. Managing invasive species only within the SSSI will be a potentially difficult and onerous task unless suitable management on adjacent 'source' areas is simultaneously undertaken. The developer commits to a long-term schedule of management work associated with invasive species outlined above and agreed with SNH.

**One of SNH's Loch Fleet SSSI Site Management Statement Management Objectives is 'To restore the condition of the sand dune habitat'. These BNG proposals to control and manage invasive species at Coul Links will deliver this Management Objective.**

In short, if the proposed golf course is not built the status quo, i.e. the expansion of several invasive species within the SSSI, will likely continue indefinitely to the detriment of the SSSI and its features. In

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<sup>4</sup> SNH. Loch Fleet SSSI Site Management Statement.

<sup>5</sup> [https://gateway.snh.gov.uk/sitelink/siteinfo.jsp?pa\\_code=984#featurePressures](https://gateway.snh.gov.uk/sitelink/siteinfo.jsp?pa_code=984#featurePressures)

contrast, if the golf course is built, it provides a guaranteed long-term mechanism to fund and manage invasive species across Coul Links and adjacent 'source' areas. Within the context of the ES, the invasive species management and the unambiguous BNG benefits it would bring would be considered a likely moderate<sup>6</sup> significant positive impact/effect for the SSSI.

### **3. Favourable conservation management of Coul Links SSSI, plus purchase and favourable conservation management of land immediate adjacent to SSSI**

The entire CLSA, including land to south of the SSSI, will be brought into favourable conservation management in agreement with SNH and funded by the developer for the lifetime of the golf course, anticipated to be at least 99 years, based on the lease for the site.

Within the SNH Loch Fleet SSSI Site Management Statement (2011) are a series of Management Objectives, some of which are specifically relevant to the Coul Links part of this large designated site. These include:

- Maintain condition of salt marsh habitats;
- Restore the condition of the sand dune habitat;
- Maintain the distribution and population size of rare and scarce plants;
- Maintain the population of breeding birds and to avoid significant disturbance to these birds during the breeding season; and
- Maintain non-breeding populations of waterfowl and avoid significant disturbance.

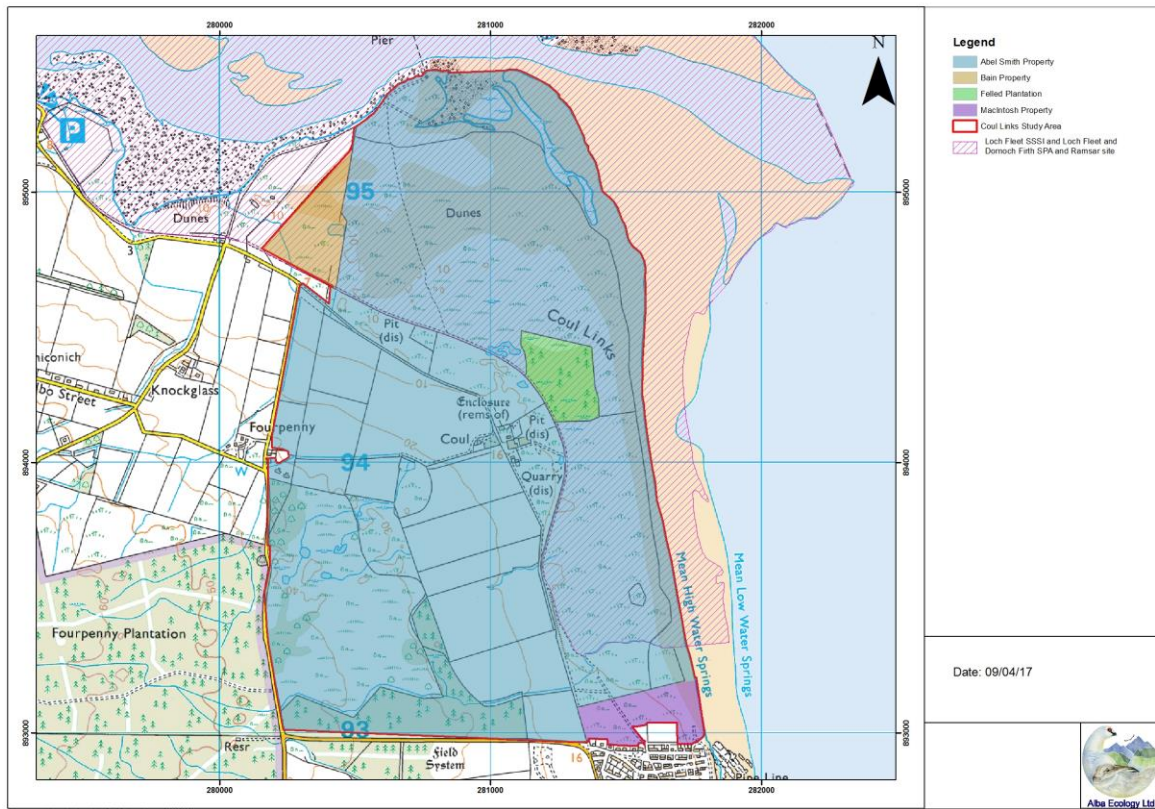
The BNG proposals include the purchase of two areas of Coul Links outwith the current ownership of the Abel Smith family (see Figure 1): (i) 7.2ha of land at Coul Links between the southern burn and Embo (not within the SSSI and known as the MacIntosh property), and (ii) 7.5ha of land at Coul Links in the northwest (which is within the SSSI and known as the Bain property). The 7.2ha MacIntosh property and 7.1ha of the Abel Smith property south of the Southern Burn totaling 14.3ha, are not in the SSSI yet will be managed as if it was part of the SSSI. Conservation management of this entire area of Coul Links will be agreed with SNH, implemented and funded by the developer for the lifetime of the golf course.

The developers intend to establish a 'conservation easement' over the entirety of the CLSA which includes 172.9ha not in the SSSI of which 14.3ha is ecologically consistent with the SSSI. A conservation easement, commonly used in the United States, is essentially a legally binding agreement amongst land-owners, developers and regulators in which a long-term site management plan is agreed and funded, in this case by the golf course. Specifically, the conservation easement agreement would commit to limitations on further development on the site as well as commitments towards high environmental and conservation management as agreed with SNH.

*Figure 1. Coul Links and associated landownership*

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<sup>6</sup> Moderate level of magnitude/change is defined as likely to affect 10-49% of this SSSI habitat at Coul Links.



A detailed conservation management plan for CLSA will aim to address all of the existing SNH management objectives by funding and implementing a range of practical measures to be agreed with SNH such as grazing and visitor management. Some of these are included within the BNG measures outlined here, whilst others are not, but will feature in the final agreed management plan for Coul Links.

**This proposal will address all Coul Links relevant Loch Fleet SSSI Site Management Statement Management Objectives.**

In short, if the proposed golf course is not built the status quo, i.e. failure to agree upon and implement site management for Coul Links with the landowner, is likely to continue into the foreseeable future. If the golf course is built, it provides a guaranteed mechanism to develop and pay for SSSI and the entire CLSA site management for the lifetime of the golf course. Further, 14.3ha ecologically consistent but not currently in the SSSI, will be managed as if it was. Within the context of the ES, the development and delivery of agreed site management and the unambiguous BNG benefits it would bring would be considered a likely major<sup>7</sup> significant positive impact/effect for the SSSI.

<sup>7</sup> Major level of magnitude/change is defined as likely to affect >50% of SSSI habitats at Coul Links.

#### 4. Dune heath expansion at Coul Links

Dune heath at Coul Links is a habitat of particular interest to SNH. It is a European Annex 1 habitat ('*decalcified fixed dunes with crowberry and Atlantic decalcified fixed dunes*') and part of the UK Biodiversity Action Plan Coastal Sand Dunes priority habitat. Using a series of detailed aerial photographs and GIS, Alba Ecology has demonstrated that there has been an approximate 3.6ha expansion of dune heath at Coul Links since SSSI designation in the 1980s; an increase of 18% in the 28 year time period.

Year	Area of dense dune heath (m <sup>2</sup> )	Area of dense dune heath (ha)
2016	24,8551	24.9
2009	24,0054	24.0
1988	21,2683	21.3

The area of dune heath expansion is predominantly in the west and northwest of Coul Links and the evidence clearly demonstrates this natural expansion is on-going.

- Area of dune heath in 1988 = 21.3ha
- Area of dune heath in 2016 = 24.9ha
- Area of dune heath lost under original layout of golf course (prior to dune heath issues being raised by SNH) = 7.4ha
- Estimated area of dune heath lost under revised layout of golf course = ~5ha
- Estimated area proposed for dune heath expansion/transplanted/restored = 6.9ha

With the area of proposed dune heath expansion considerably greater than the predicted area of dune heath loss, the proposal will achieve '*no nett loss*' in dune heath habitat extent, and will result in a '*net increase*' of ~1.9ha of dune heath within the SSSI. Additionally, if a greater portion of the felled tree plantation is seeded with dune heath, the estimated net increase would be greater. We currently anticipate approximately 1-2 ha of dune heath to be placed in this area.

There is extensive best practice guidance available to inform proposed heath expansion and transplantation at Coul Links. Dune heath expansion and heath transplantation has been successful on a number of golf courses in the UK in recent years including three which are partly within SSSI's. The Coul Links team has visited all these courses and met with their site management teams to begin a thorough understanding of their transplantation programs.

- Castle Stuart Golf Links, Inverness (SSSI);
- Walton Heath, Surrey;
- Carnegie Golf Club, Skibo Castle, Dornoch (SSSI);
- Sunningdale Golf Course, Berkshire (SSSI);
- Thornbury Golf Club, Bristol; and
- Royal Birkdale Golf Club, Southport.



Castle Stuart, partly located within a SSSI, translocated 1.5ha of heather and associated species (including crowberry) onto sandy soils in 2007 from a donor location ca. 40 miles away (Photo 1). The seed and brash from the translocated heather was collected and sown to create new heathland areas (Photo 2). According to Castle Stuart's monitoring programme, the translocation was almost immediately successful with a lichen understorey quickly established within the translocated heather.

*Photo 1. Transplanted heath, Castle Stuart*



*Photo 2. Heather grown from seed, collected from the transplanted heath, Castle Stuart*



SNH's Information and Advisory Note No. 44<sup>8</sup> '*Heather re-establishment on mechanically disturbed areas*' provides an important starting point for the methods of translocation and seeding of heather material at Coul Links. Transplantation would involve removing heath with a front loader, with a large root mass, and re-planted in suitable locations such as the felled coniferous plantation with the Coul Links SSSI. Key points are: heath removal and translocation should be achieved on the same day wherever possible whilst watering the translocated heather on the day of translocation.

Dune heath expansion would likely also be achieved through seeding. Key points are: collect heather seed and brash from on site, and sow in suitable locations; encourage heather establishment through weeding of grasses and other competing species. The developer plans to use UK experts in heath

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<sup>8</sup> <http://www.snh.org.uk/publications/on-line/advisorynotes/44/44.htm>

management, restoration and transplantation at golf courses at Coul Links. Full details of these techniques would be provided in the Habitat Management Plan within the ES.

It is worth noting that SNH's dune habitat advisor does not accept that dune heath can be transplanted or created (grown from seed), despite extensive evidence to the contrary from other golf courses (e.g. Photos 1 and 2). The contention is that such artificially created/restored heath habitat does not '*count as proper dune heath*' despite having all the constituent species and similar composition. We've struggled with addressing this logic which appears akin to rejecting north Scotland's reintroduced red kites or south Scotland's soon to be reintroduced golden eagles as '*not proper red kites or golden eagles*'. Thus, there is a disconnect between Alba Ecology's evidence-based assessment that dune heath can be transplanted/restored and in effect be recreated in the right conditions, noting that much of the dune heath predicted lost to land-take at Coul Links is species poor and so likely to be relatively easy to recreate/transplant.

**One of SNH's Loch Fleet SSSI Site Management Statement Management Objectives is 'To restore the condition of the sand dune habitat'. These BNG proposals to expand dune heath (against a natural background of an expanding SSSI dune heath resource) will deliver this Management Objective.**

In short, the proposed golf course will ensure no net loss in dune heath habitat at Coul Links and indeed, a small expansion in the dune heath resource is predicted. Within the context of the ES, the small/modest increase in dune heath and its associated BNG benefits would be considered a likely minor<sup>9</sup>, non-significant positive impact/effect for the SSSI.

#### **5. Habitat restoration of felled conifer plantation area at Coul Links**

Within the Coul Links SSSI there is a 6.8ha area of felled conifer plantation (see Figure 1) most of which is currently of negligible biodiversity value or importance. As part of the proposed development, this area, which will contain a portion of two golf holes, will also be restored to a mosaic of dune heath and dune grassland using established and effective methods.

There are examples of dune heath restoration work within Europe (e.g. Denmark) where dune heath has been re-established on areas which had been planted with conifer trees (<sup>10</sup>). The 6.8ha felled plantation area within the Coul Links SSSI (around holes 10 and 11) would be suitable for dune heath restoration work of this nature. This could be achieved by clearing the area of the brash and stumps (probably mechanically) and either re-planting some transplanted heath vegetation (i.e. ling heather *Calluna vulgaris* cut elsewhere on the course layout) or, possibly more easily, cut brash from established nearby heath and spread it over the cleared areas. This form of spreading heath brash allows young heather plants to establish within 1-2 years and has been successful at nearby sites such as Skibo and Castle Stuart golf courses. Within the former conifer plantation there are areas of (U2a) grassland with wavy hairgrass *Deschampsia flexuosa* and some dwarf shrubs including ling heather, cross-leaved heath *Erica tetralix* and bell heather *Erica cinerea*. This community indicates that the area would likely be suitable for heath vegetation. In other words, the evidence from the plantation area suggests heath restoration would be a viable restoration method at this location.

**One of SNH's Loch Fleet SSSI Site Management Statement Management Objectives is 'To restore the condition of the sand dune habitat'. These BNG proposals to restore sand dune habitats at the felled conifer plantation will help deliver this Management Objective.**

<sup>9</sup> Minor level of magnitude/change is defined as likely to affect 1-9% of this SSSI habitat at Coul Links.

<sup>10</sup> [http://naturstyrelsen.dk/media/nst/Attachments/SNS592x924\\_WEB.pdf](http://naturstyrelsen.dk/media/nst/Attachments/SNS592x924_WEB.pdf)

In short, if the proposed golf course is not built the status quo, i.e. the condition of the degraded, felled conifer plantation habitat with low biodiversity value in the SSSI, will remain unrestored. In contrast, if the golf course is built, it provides a guaranteed long-term mechanism to fund and restore important habitats at Coul Links. Within the context of the ES, the restoration of natural dune habitats in the felled conifer plantation and the unambiguous BNG benefits it would bring would be considered a likely minor<sup>11</sup> non-significant positive impact/effect for the SSSI.

## 6. Enhanced understanding of Fonseca's seed-fly ecology

Fonseca's seed-fly is a true fly (Diptera) of the family *Anthomyiidae* which is only known to live on coastal sand dunes in east Scotland. It was first collected in 1965 and only named *Botanophila fonsesai* as recently as 1989 (Ackland, 1989<sup>12</sup>). Fonseca's seed-fly is the rarest species known at Coul Links and consequently will be considered in detail within the ES. The ecology of the species is very poorly known, as evidenced by Alba Ecology's 2016 Coul Links survey extending the known global range of this localised endemic species by 29% from 6.3km to 8.1km of coastal dune; a substantial expansion for such an apparently range restricted species. The Coul Links survey has also extended the known flight period of this poorly understood species too.

Fonseca's seed-fly is thought to be a univoltine species, only producing one brood of young a year, overwintering before emerging as adults in June. It is believed, but not confirmed, that they use the flowers of composite plants to oviposit their eggs, and so areas at Coul Links which are rich in these plants (ragwort *Senecio jacobaea* in particular), could be important for the life cycle of Fonseca's seed-fly (Gibbs, 2013<sup>13</sup>).

When studying the conservation needs of this species, it is necessary to consider the lack of knowledge regarding important elements of the ecology of Fonseca's seed-fly. Given the small global range and importance afforded to Fonseca's seed-fly, understanding more about the ecology of the species is crucial for its management, not just at Coul Link, but elsewhere in east Scotland.

The requirements of Fonseca's seed-fly will be considered in four main ways, as part of BNG:

- Phase 1- ensure large and important habitat areas for composite flowers at Coul Links are retained through design layout.
- Phase 2 - fund a PhD studentship into the unknown, important elements of Fonseca's seed-fly ecology.
- Phase 3 – publish the findings of the PhD studentship so that the ecology of the species is more widely understood and recognised.
- Phase 4 – commit to adjust and target habitat management at Coul Links towards Fonseca's seed-fly favoured composite flowers (and other elements if necessary) in light of the PhD studentship results.

**One of SNH's Loch Fleet SSSI Site Management Statement Management Objectives is 'Maintain the distribution and population size of rare and scarce plants'. These BNG proposals ensure the retention and management of large and important habitats for composite flowers will deliver this Management Objective, along with the design layout which avoids the locations of rare plants.**

<sup>11</sup> Minor level of magnitude/change is defined as likely to affect 1-9% of SSSI habitats at Coul Links.

<sup>12</sup> Ackland, D.M. 1989. Anthomyiidae (Dipt.) new to Britain, with a description of a new species of *Botanophila* Lioy. *Entomologists Monthly Magazine*, 125, 211-230.

<sup>13</sup> Gibbs, D. 2013. Survey and ecology of *Botanophila fonsesai* Ackland (Diptera, Anthomyiidae), a seed-fly endemic to Scotland. *Scottish Natural Heritage Commissioned Report No. 618*.

In short, if the proposed golf course is not built the status quo, i.e. lack of detailed knowledge of the ecology or targeted management of Fonseca's seed-fly, will likely remain. In contrast, if the golf course is built, the ES will commit mitigation to ensure that: (i) areas of potentially important Fonseca's seed-fly food plant will be protected and managed for this species (note for the first time this conservation management would cover a substantial proportion of the known global range of Fonseca's seed-fly), and (ii) the golf course development will be used as a mechanism to fund and target detailed PhD research into the poorly known areas of Fonseca's seed-fly's ecology and then disseminate the findings by publication for use in conservation management. Within the context of the ES, the Fonseca's seed-fly research and conservation work would be considered a likely major<sup>14</sup> significant positive impact/effect for the species both within and outside the SSSI.

## **7. Community Engagement and Public Awareness**

The developer seeks to secure full and active community engagement through the involvement of the Embo Trust as a development partner throughout the planning, construction and life of the proposed Coul Links golf course. Discussions between the developer and Embo Trust continue, and the ongoing dialogue and involvement has been welcomed by Embo Trust who are seeking to become directly involved via fundraising, a direct equity investment in the project and be a signatory on the ES and the Planning Application.

Awareness of the wider public has already been raised through two sets of public consultation events held in each of Dornoch and Embo in 2016, and which were attended by several hundred members of the wider local community. Considerable feedback from these events has been received and has been taken into account in the ongoing design process. Scottish Government advice<sup>15</sup> on community engagement and the promotion of wider public awareness will continue to be followed in preparing the planning application.

Some existing public use of Coul Links causes adverse impacts on the sensitive ecology at Coul Links, namely:

- Disturbance of nesting Schedule 1 birds by walkers and dogs during breeding season<sup>16</sup>;
- Litter, and associated remediation around the Embo dump; and
- Illegal use of all-terrain vehicles (ATV) in the dune area.

The unauthorised use of ATVs by members of the local community regularly causes damage at Coul Links. Whilst the existing land owners have attempted to control it, they have found it impossible to police constantly. If the golf course is developed, it should help eliminate ATV use at Coul Links through the regular presence of legitimate users and by the patrolling of the golf course personnel.

A Visitor Management and Community Engagement Plan will aim to engage effectively with local people who live and work next to and use Coul Links. Full detail of the plan will be provided within the ES. Local community co-operation in the development (through the Embo Trust's involvement) is the ideal way to get direct local involvement in the sustainable management and future use of Coul Links. The Coul Links team considers the rich cultural, historical, and ecological aspects of the CLSA to be strategic to the success of the golf course. They seek to encourage the collection and distribution of information on these aspects to visitors. Further, the developers are giving consideration to the

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<sup>14</sup> Major level of magnitude/change is defined as likely to affect >50% of the population at Coul Links.

<sup>15</sup> Scottish Government 2010. Planning Advice Note 3/2010 Community Engagement.

<sup>16</sup> SNH. Loch Fleet SSSI Management Statement.

employment of a site ecologist who will monitor the site as well as develop and disseminate ecological information to the public.

**Two of the SNH's Loch Fleet SSSI Site Management Statement Management Objectives are '*Maintain the population of breeding birds and to avoid significant disturbance to these birds during the breeding season*'; and '*Maintain non-breeding populations of waterfowl and avoid significant disturbance*'. These BNG proposals effectively engage with visitors and the local community in the long term management of Coul Links will help deliver these SSSI Management Objectives into the future.**

In short, if the proposed golf course is not built the status quo, i.e. the lack of substantive and meaningful engagement with the local community and its associated adverse ecological impacts e.g. disturbance, litter and ATV use, will likely remain or continue. In contrast, if the golf course is built, the enthusiastic and sincere involvement of Embo Trust in the form of sustainable community engagement with the project will help to achieve the objectives of long-term sustainable conservation management of Coul Links.