

14 November 2017

Head of Planning and Building Standards  
The Highland Council  
Glenurquhart Road  
Inverness IV3 5NX  
[eplanning@highland.gov.uk](mailto:eplanning@highland.gov.uk)

Ramblers Scotland  
Caledonia House  
1 Redheughs Rigg  
South Gyle  
Edinburgh  
EH12 9DQ

Phone: 0131 472 7006

Email [scotland@ramblers.org.uk](mailto:scotland@ramblers.org.uk)  
[www.ramblers.org.uk/scotland](http://www.ramblers.org.uk/scotland)

Dear Sir or Madam

**Planning application: 17/04601/FUL – Development of 18 hole golf course, Coul Links**

Ramblers Scotland is writing to **object** to the above application, on the grounds of the insufficient attention given to public access in the Environmental Statement and on the impact this development would have on a valuable walking environment which currently offers people a rare chance to view natural dune landscapes, important habitats and protected species. We support the joint submission from environmental organisations RSPB Scotland, Scottish Wildlife Trust, Buglife, Butterfly Conservation, Marine Conservation Society and Plantlife, with their more detailed comments on the adverse impacts of this development on plants, wildlife and habitats. We will concentrate below on our additional concerns relating to recreational access and the landscape impacts of this proposal.

Ramblers Scotland helps everyone, across Scotland, enjoy walking and protects the places we love to walk. We are the representative body for walkers in Scotland and are recognised by **sportscotland** as a governing body of sport. We are a membership organisation with 54 local walking groups in Scotland, running 3,500 group walks a year which are led and organised by 1,200 volunteers.

Over the past two decades we have had concerns about a number of new golf courses in other coastal areas of Scotland. These concerns have centred on the long term loss of important natural landscapes and the encroachment of development along the coastal fringe, with the resulting impact on public access and natural heritage. We have similar concerns with regard to this proposal.

With regard to landscape impacts, Coul Links is a rare, undisturbed dune system, offering walkers and others the chance to experience important habitats and view species which are protected at both a national and international level. We believe this development would be contrary to a number of policies in the Highland-wide Local Development Plan, including Policy 57 Natural, built and cultural heritage, and Policy 61 Landscape.

This proposed development and the resulting land use change would significantly affect the views and the character of the area if it is approved. It would remove the area's wild qualities for those enjoying outdoor recreation in what is now a relatively undisturbed coastal setting, and instead turn the dunes into manicured golf links, the like of which are found in more than [90 other places in Scotland](#). Currently walkers and riders can enjoy extensive views from the beach across the natural, unspoilt dune system and across expansive seascapes to Ben Bhraggie and the eastern coast of Sutherland. The development of the course, and particularly holes 15 and 17 which will lie within a few metres of the beach, would mean the course is clearly visible to anyone walking on the beach. As a result the

wild nature of this landscape would be lost, transformed into a managed golf course. Some dunes would need to be flattened to make way for holes, altering the natural dune topography. According to the coastal erosion report, multiple sand fences and marram planting would be required to stabilize the sand and create a buffer zone to protect these holes, and this would form an unnatural intrusion on to the beach. We do not believe this transformation is justified for this development.

With regard to public access on the site, access rights are a material consideration in planning and while we are pleased to see that there has been some recognition of public rights of access across golf courses and the current levels of use by walkers of this area, we are deeply concerned by the lack of weight given to this aspect and the poor level of detail in the Environmental Statement and related Recreation and Access Management Plan (RAMP). We note and whole-heartedly support the comments of the council's Access Officer in this regard.

The Environmental Statement gives assurances that the proposed golf development must result in no net loss of amenity or recreational areas. However, given that currently there is unlimited public access across the site, enabling people to enjoy the wild qualities of this landscape, we are not convinced that this aspect has been given sufficient attention. As well as the residents of Embo and nearby settlements, there is a substantial summer population in the caravan park who use this area for recreational walking, as well as other visitors to the area and those walkers using the route of the core path which is part of a national long distance route.

We believe it is crucial that full consideration is given to all aspects of public access and that a fully comprehensive RAMP must be developed and agreed by all relevant stakeholders, including representatives from the community, recreation bodies, Scottish Natural Heritage and the council. This must be done before any decision is made with regard to the proposal.

Rather than simply cutting and pasting generic advice for golf course managers, the RAMP needs to set out a clear and comprehensive statement by the developer, showing they understand that access rights apply to the entire area of the golf course, apart from the greens and curtilage of any buildings, and that this needs to be accommodated and planned for with regard to this particular context at Coul Links. The management of access during the construction period, if the application is approved, needs to be fully considered and in addition, it is essential that all golfers using the course be given information on this aspect of golfing in Scotland and be made aware that they are likely to see members of the public on the course who aren't walking on the core path.

We note the RAMP's comment which suggests that most walkers will be accessing the site using the core path which crosses the course. It is possible also that cyclists and horse-riders will also be using this route. The proposed layout of the course in the masterplan appears to show that seven of the holes would be played across this core path. We believe this is an issue of great concern, and poses an unnecessarily high risk for users of this route. Public access has clearly not been considered when designing the course although it is clear in the environmental statement that many other issues relating to the habitat and natural features were taken into consideration as the layout was finalised.

It is important to recognise that this core path also forms a section of the John o'Groats Trail, a long distance route which runs from Inverness to the north coast. The route is expected to fully open in 2018, and it has been the subject of a supportive motion in the Scottish Parliament, praising the benefits it will bring to the region. Given that this trail links in the south to the Great Glen Way and beyond that the West Highland Way, it has the potential to bring a significant number of visitors to this part of Sutherland who will be enjoying multi-day walking trips and bringing substantial economic benefits to businesses along the route. It is

crucial that the use of this path, including its potentially increased use in future as the trail is promoted more widely, is considered as part of the overall design and management of the course. There would need to be guidance cautioning walkers on any possible risks and also outlining their responsibilities when crossing a golf course along with the above-mentioned need for advice to the players. We advise that consideration is given to altering the line of this core path using the legal framework set out in the Land Reform Act 2016.

As well as the core path, people will be accessing the golf course from many points along the beach. We are aware that currently there is a popular path which runs along the top of the dunes and enables people to take an alternative route back to their starting point at Embo. However, the creation of holes located within the dunes, in particular holes 15 and 17, would remove the option of this route as an alternative. Walkers would be acting within their rights to cross the golf course at any point, as long as they are acting responsibly and avoiding any interference with play. Therefore a study of the existing patterns of public access is required to design routes which fit closely with current desire lines and potentially also can be used by golfers and for maintenance purposes. This would minimise the chance of walkers interfering with play and would also ensure that they feel welcome on the course, with the result that they would be more likely to comply with any reasonable request to use these paths where possible.

We would be happy to meet the local authority or the developer to discuss these issues further.

Yours faithfully

Helen Todd  
Campaigns & policy manager