

From: [Ian Bray](#)
To: [Daniel Gotts](#)
Subject: FW: 2017 01 27 - Coul Links - briefing for SG - 27 January 2017 (A2194186)
Date: 27 January 2017 16:34:21
Attachments: [2017 01 27 - Coul Links - briefing for SG - 27 January 2017.docx](#)

fyi

From: Ian Bray
Sent: 27 January 2017 16:24
To: Keith Connal (keith.connal@scotland.gsi.gov.uk)
Cc: Dave Mackay; David Patterson; Kristin Scott; Ian Jardine; Nick Halfhide; SNHGOVERNMENT_RELATIONS
Subject: 2017 01 27 - Coul Links - briefing for SG - 27 January 2017 (A2194186)

Dear Keith

Please find attached a briefing on the Coul Links golf course.

Please come back to me should you require any further information.

Thanks

Ian

[Ian Bray](#) | Operations Manager | Scottish Natural Heritage | Strathallan House | Castle Business Park | Stirling | FK9 4TZ | Mobile [REDACTED] | ian.bray@snh.gov.uk

Ian Bray has sent you a copy of "2017 01 27 - Coul Links - briefing for SG - 27 January 2017" (A2194186) v2.0 from Objective.

Proposal for golf course at Coul Links – briefing

Background

Coul Links is located to the north of Dornoch on the east coast of Sutherland.

SNH have been involved in discussions with a proposal for a golf course at Coul Links since September 2015. We have had regular contact with the developer and their consultants through meetings, a site visit, correspondence and telephone conversations. Contact has primarily been through local SNH staff, but senior SNH staff have also met with the applicant.

The proposal is for a 18 hole golf course and associated infrastructure.

The proposal lies within the Loch Fleet Site of Special Scientific Interest (SSSI) and Dornoch Firth and Loch Fleet Special Protection Area (SPA). SNH has advised it would be challenging to locate such a proposal within these protected areas throughout all contact.

SNH were first asked to comment on layout of the golf course in September 2016.

Natural Heritage interests of Coul Links

Loch Fleet SSSI is protected for a number of nationally important interests including a number of various coastal habitats, Caledonian pinewood and wide diversity of coastal breeding birds.

Dornoch Firth and Loch Fleet SPA is protected for a variety of wintering species of wildfowl and waders, together with breeding osprey, which all occur in sufficient numbers to be of international importance.

A rare fly (Fonseca's seed fly) was discovered to be present in Coul Links during surveys undertaken by the consultants. This fly has a very restricted known global range to the immediate coastal fringe on the northern shore of the Dornoch Firth. The species is listed as a priority for conservation action on both Scottish and UKBAP biodiversity lists. Very little is known about the ecology of this species.

Key impacts to natural heritage

Through working closely with consultants and discussing survey results as they become available, SNH have been able to provide advice over the most critical impacts, while discounting others. This identified that potential impacts to the SPA and SSSI breeding birds would be unlikely to adversely affect the integrity of these protected interests. This allowed more recent assessment to focus on impacts to the SSSI sand dune interest.

The layout for the golf course runs the length of the sand dune system of Coul Links, including greens, fairways and tees. There are a number of component sand dune habitats within the dune system, with dune heath and dune slack being the two most affected.

The proposal would impact on these two habitat types principally through habitat loss (for dune heath) as the habitat would need to be changed for golfing purposes (i.e. heather to grass) and, through changes to the hydrology of the dune system (dune slack) through habitat modification. The dune heath at Coul Links includes the particular type "dune heath with crowberry", of which there is only 338 ha within Scotland (& UK) and, as a result, is of high conservation importance (it is also an EU Annex 1 habitat). The hydrology of dune slacks is highly complex, seasonably variable and is poorly understood, so there is a significant level of uncertainty over impacts.

In addition to these direct impacts, indirect impacts such as fragmentation of the dune habitats will also need to be assessed, given the course layout runs the length of the dune system.

How have we worked to reduce impacts?

SNH has worked with the developer and consultants, with difficulties only occurring since October 2016, when the first detailed course layout was proposed. Due to the impacts mentioned above, SNH advised they thought 1/3 of the course could be accommodated within the SSSI, with the remainder of the course located on adjacent land within the same land ownership. This would involve a 1/3 of the course being located on less sensitive and more common sand dune habitats (within the SSSI), and avoiding the more sensitive and rarer sand dune habitats (within the SSSI). This was not accepted by the developers as they want the course located entirely within the dune system and have not been prepared to discuss significant alternatives to course design.

We continue to work with the developer's consultants to try and reduce the level of impacts to the dune heath (at the consultant's request). This has caused some tensions. SNH accept that the SSSI sand dune interest is in unfavourable condition and would benefit from positive management measures to remove invasive scrub. The consultants consider that the dune heath has increased in extent since the SSSI was notified, but SNH's view is that all the sand dune habitat is part of the protected interest and not just the original extent. The developers have proposed to offset habitat losses through recreating or translocating dune habitats, but there is currently no policy context within Scotland (or UK) to support such an approach. Some guidelines have been developed for biodiversity offsetting, but they state it should not be undertaken within protected areas.

SNH
27 January 2017

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Ian Bray
Sent: 20 February 2017 13:28
To: Keith Connal (keith.connal@scotland.gsi.gov.uk)
Cc: Nick Halfhide; Ian Jardine; Jan.Anderton@gov.scot
Subject: 2017 01 27 - Coul Links - briefing for SG - 27 January 2017 (A2194186)

Keith

Here are a few links to three documents which cover the information you are looking for, they are all quite short. Please get back to me should you need anything further.

Ian
Ian Bray | Operations Manager | Scottish Natural Heritage | Strathallan House | Castle Business Park | Stirling | FK9 4TZ | Mobile [REDACTED]
| ian.bray@snh.gov.uk

SNH's role in support of development and regulation - We set out our role in our service statement – [Planning for Development](#).

We only object to development when it raises natural heritage issues of national interest. We have set out our approach in [Identifying Natural Heritage Issues of National Interest in Development Proposals](#),

Our balancing duties apply to all of our work, including advice on development. We have set out our approach in [Applying SNH's Balancing Duty](#). The only exception to this is advice with respect to effects on Natura sites where our duties under the Habitats Regulations override our balancing duties.

Describing and evaluating impacts on natural heritage

(the following is an extract from our internal Development Management Guidance)

This section helps us respond in a consistent way when evaluating the impacts of proposals that affect Natura sites, NSAs, SSSIs and protected species. These sites and species have special legal protection and so it is particularly important that our advice enables the PA and the developers to comply with the legislation and follow due process.

Natura sites

The purpose of an appraisal under the Habitats Regulations (commonly known as Habitat Regulations Appraisal – HRA) is to identify proposals that can proceed without jeopardising the site’s Conservation Objectives. It is not to rule out every conceivable circumstance that could, in theory, result in an adverse effect. Advice that there is likely to be a significant effect and that an appropriate assessment is required must be reasonable. A judgement of likely significant effect should be based on clear connectivity between the proposed plan or project and the qualifying interest(s) of the Natura site, which is likely to result in the proposal undermining the conservation objectives of the site, or where such an effect cannot be excluded.

The [Natura Casework Guidance](#) provides more detail on the consideration of proposals affecting SACs, SPAs and Ramsar sites and you should read it alongside this guidance. Where a Natura site is involved, the key questions relate to the following 3 tests. A detailed explanation of these tests is provided in the Natura Casework guidance and you should familiarise yourself with this before completing a Natura proforma and writing a response letter

N1) Is the plan or project directly connected with or necessary to site management for nature conservation management purposes (and part of a fully assessed and agreed management programme)?

Although you should consider this question, it will not usually be necessary to refer to this question in the response unless the applicant is claiming, or is likely to claim in the future, that the proposal is necessary for conservation management purposes.

N2) Is the plan or project (either alone or in combination with other plans or projects) likely to have a significant effect on the site?

Use the Natura proforma as a framework for considering this question. If there is a likely significant effect on the qualifying interests then it is important to explain the connection between the proposal and the qualifying interests: how a specific aspect of the proposal could affect a specific qualifying interest and if possible explain the likely scale and nature of that effect.

N3) Can it be ascertained that the plan or project will not adversely affect the integrity of the site?

Use the Natura proforma as a framework for considering this question. You should take care to explain the specific ‘cause and effect’ mechanism, in other words, explain why (or why not) a particular element of the proposal is (or is not) likely to have an effect on a particular qualifying interest to the extent that the site’s conservation objectives are undermined or, if this cannot be determined, why not.

Sites of Special Scientific Interest

Scottish Planning Policy states that “*development that affects a SSSI should only be permitted where it will not adversely affect the integrity of the area or the qualities for which it has been designated*”. In terms of responding to a planning consultation, the key question to address with regard to the impacts of a proposal on a SSSI is therefore:

“Will it affect the integrity of the area or the qualities for which it has been designated?”

In answering this question we should consider:

- impacts on the natural features of a site (direct and indirect)
- the extent to which adverse impacts undermine the management objectives for a site as set out in the Management Statement
- the extent to which impacts of a development might affect the condition of the site’s natural features
- the permanence of the impacts, and
- impacts in combination with other proposals or activities.

In reaching a conclusion about the importance of the impacts, it may be helpful to consult the site attribute table in order to judge the magnitude of an impact in relation to key indicators. This will also help ensure that you don’t miss possible indirect effects on natural features, or effects that might take years to manifest.

Decision-makers sometimes struggle to understand why small losses to a site or temporary losses of quality are important and you should therefore take care to explain this in simple terms.

The following concepts are important here:

- Once designated all parts of a SSSI (the whole site) collectively assume the minimum standard of “special interest”. This is why damage to one small bit of the site affects the site’s ‘integrity’ or ‘wholeness’.
- Loss of or damage to any one feature cannot rationally be justified by the survival of the larger fraction since, once the process has begun, there are no logical stopping points. The setting of arbitrary limits to incursion would merely undermine the consistency of approach that is the credible basis for SSSI selection.
- SSSIs should be in favourable condition continuously to fulfil their purpose.

It is also essential to establish the likely permanence of adverse impacts. We may be able to avoid objecting to proposals where the natural features that experience short-term damage or a disturbance event can recover within one breeding or growing season without intervention. In addition, minor interventions or changes can sometimes effectively avoid damage or ensure that the condition of the site recovers quickly.

Exceptions to this could be acceptable in relation to major/national developments that take many years to complete and have substantial wider public benefit. In these cases, it might be reasonable to accept that the condition of the natural features of a site might be depressed for longer, provided measures were in place to secure swift recovery once the construction was completed. In these circumstances it would also be reasonable to expect the developer to put in place measures that would compensate for the temporary loss of favourable condition for the duration of the construction, preferably in an area close to the site.

Where natural features are already in unfavourable condition our advice should promote recovery. We should consider objecting to damaging proposals in such circumstances.

From: Keith.Connal@gov.scot
Sent: Sunday, 19 February 2017 20:27
To: Nick Halfhide
Cc: Ian Jardine; Jan.Anderton@gov.scot
Subject: RE: 2017 01 27 - Coul Links - briefing for SG - 27 January 2017 (A2194186)

Nick

Pending us catching up on this, could you give some thought to any off-the-shelf SNH documents which potentially would help give Liz Ditchburn some background on the approach adopted by SNH to considering a potential development involving a SSSI and a European protected area. In particular, it would be good if she could see anything that is written down about SNH’s balancing duties in the founding legislation and the consideration which SNH needs to give as a result of the Better Regulation legislation.

Liz won’t want to wade through reams of material but equally she has said she is happy to receive ‘raw’ material rather than troubling officials in SG or SNH to write lots of bespoke briefing.

Are there documents which come to mind which might fit the bill?

Thanks

Keith

From: Nick Halfhide [<mailto:Nick.Halfhide@snh.gov.uk>]
Sent: 19 February 2017 15:15
To: Connal K (Keith)
Cc: Ian Jardine; Anderton JM (Jan)
Subject: Re: 2017 01 27 - Coul Links - briefing for SG - 27 January 2017 (A2194186)

Keith

Thanks for this update. I will keep 15th March free. Happy to discuss before then.

Nick

Sent from my BlackBerry 10 smartphone.

From: Keith.Connal@gov.scot
Sent: Friday, 17 February 2017 18:50
To: Nick Halfhide
Cc: Ian Jardine; Jan.Anderton@gov.scot
Subject: RE: 2017 01 27 - Coul Links - briefing for SG - 27 January 2017 (A2194186)

Update

Nick – briefly, just to say that DG Economy is indeed going to engage on this and convene a meeting with the developer, SNH, HIE and VS. Looking at 15 March in Inverness, hosted by HIE.

I suggest we arrange a call to discuss but I thought it would be helpful to let you know now of the thinking here.

Ian, we checked your availability with Liz today for a 1-1 meeting with Liz next week, as part of her induction as I don't think she has engaged directly with SNH yet and partly to chat about this development. One of the reasons she is getting involved is to learn more about the way in which planning operates and in particular about the approach to balancing economic and environmental factors, including in relation to matters where the Directives are relevant.

Keith

.....

Nick

The briefing was indeed helpful, thanks. No follow up needed immediately, but it's possible, especially in light of the developer's decision not to proceed meantime with a planning application, that the SG (perhaps in the guise of DG Economy) might wish to engage with this. I am awaiting further word from Liz Ditchburn and I will come back to you then.

Regards

Keith

From: Nick Halfhide [<mailto:Nick.Halfhide@snh.gov.uk>]
Sent: 06 February 2017 15:27
To: Connal K (Keith)
Cc: Ian Jardine
Subject: FW: 2017 01 27 - Coul Links - briefing for SG - 27 January 2017 (A2194186)

Keith

I hope you found this briefing helpful. I was wondering if there is any follow up you require.

Happy to discuss on the phone if that would be more convenient.

Nick

Nick Halfhide
Director of Operations
Scottish Natural Heritage


01463 725224

From: Ian Bray
Sent: 27 January 2017 16:24
To: Keith Connal (keith.connal@scotland.gsi.gov.uk)
Cc: Dave Mackay; David Patterson; Kristin Scott; Ian Jardine; Nick Halfhide; SNHGOVERNMENT_RELATIONS
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Thoiribh an aire airson adhbharan gnothaich, 's dòcha gun tèid sùil a chumail air puist-dealain a' tighinn a-steach agus a' dol a-mach bho SNH.

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Dh'fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh'fhaodadh nach eil beachdan anns a' phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.

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Rhoda Davidson

From: Ian Bray
Sent: 20 February 2017 17:14
To: Keith Connal (keith.connal@scotland.gsi.gov.uk)
Cc: Nick Halfhide; Ian Jardine; Jan.Anderton@gov.scot
Subject: RE: 2017 01 27 - Coul Links - briefing for SG - 27 January 2017 (A2194186)

Categories: INFORMATION

Keith

Further to my email below. I located a short summary, see below, of our balancing duty which also links to which also makes links to the Scottish Regulars' Code of Practice.

Thanks

Ian

SNH's balancing duty

SNH is required by statute to take into account other interests when discharging its remit

Section 3 of the Natural Heritage (Scotland) Act 1991 states

'.....it shall be the duty of SNH in exercising its natural heritage functions to take such account, as may be appropriate in the circumstances, of:

- a) actual or possible ecological and other environmental changes to the natural heritage of Scotland;
- b) the needs of agriculture, fisheries and forestry;
- c) the need for social and economic development in Scotland or any part of Scotland;
- d) the need to conserve sites and landscapes of archaeological or historic interest;
- e) the interest of owners and occupiers of land; and
- f) the interests of local communities.'

And section 1(2) of the Deer (Scotland) Act 1996 states:

'.....it shall be the duty of SNH, in exercising its deer functions, to take such account as may be appropriate in the circumstances of:

- a) the size and density of the deer population and its impact on the natural heritage;

- b) the needs of agriculture and forestry; and
- c) the interests of owners and occupiers of land.

Collectively, these requirements are termed SNH's 'balancing duties'. They are designed to ensure that we are alert to other considerations.

Our approach is outlined in:

Summary - <http://www.snh.gov.uk/docs/A406599.pdf>

Approach - <http://www.snh.gov.uk/docs/A435198.pdf>

As outlined in the guidance, the importance which we place on other interests/considerations, relative to our purpose, is a matter for our discretion and does not override our primary aims and purposes. The need for such exemptions is reiterated in Section 4(1) of the Regulatory Reform (Scotland) Act 2014, namely "*...in exercising its regulatory functions, each regulator must contribute to achieving sustainable economic growth, except to the extent that it would be inconsistent with the exercise of those functions to do so*". For example, advice on projects or plans affecting Natura sites are exempt from our balancing duties. Here, it is Ministers or local authorities who make any decisions on overriding public interest.

To achieve consistency in implementation of this approach, internal Guidance Notice 056 – Applying SNH's Balancing duties outlines the process that staff should follow. The guidance highlight that there are both formal requirements (and exclusions) and behavioural needs. The formal requirements relate to in documenting our application of the duty in contentious cases, whilst the behaviour needs relate to understanding the operational context and interests of others in our day-to-day working.

It is important to highlight that in situations beyond our SSSI and wildlife management regulatory functions, we are not the decision taker and it is not our role to reconcile different interests. In these situations, our role is to take wider interests into account, and not to conclude the required balance. Understanding such context is important and places the onus on application of our duty through positive influencing/facilitation.

We apply our balancing duty to all our work and are conscious of wider interests when formulating our decisions, advice or guidance. This reduces the circumstances when we need to formally change our position and document 'our balance'. This is not because we are not applying our balancing duty, but because we are identifying and discussing compromise or mitigation as a matter of routine. This is key to enabling development and promoting sustainable economic growth.

An indicator of the appropriateness of this approach is reflected in the overall high levels of satisfaction in our planning and development customer survey.

Similarly, the approach has not been successfully challenged at Public Inquiry or by other means.

Examples of implementation

Another indicator of the appropriateness of our approach are the positive examples that show effective use of our balancing duty. Some examples of where we have applied our duty are :

- a. Licencing. In making most species licensing decisions we consider the interests of the applicant and wider public benefits before making a reasonable decision. Proportionality also applies in licensing decisions we take affecting European Protected Species where the law requires strict application of the relevant licensing tests but guidance from the European Commission gives some flexibility.
- b. Development Advice. We responded to a planning application for works at Ardersier to establish a port and port-related services for the energy sector. The implementation of the final proposed project would lead to damage to and partial loss of the national interest of geomorphological features at Whiteness Head SSSI. However, SNH recognised that this development was of national importance. We advised decision-makers that in this case, we considered the partial and temporary loss of part of the SSSI to be acceptable given the economic and social value of the proposed development. We clearly set out the nature and implications of the loss so that decision-makers were fully informed when coming to a conclusion on the planning application.

These examples illustrate that there have to be significant, important and agreed public benefits for our advice to be changed/moderated.

Updating our guidance

We are currently reviewing our guidance on implementation of our balancing duties. Given the broad application. The Review is taking into account:

- a. **The requirements of the Scottish Regulators' Strategic Code of Practice to review operational policies**, and particularly "*...whilst regulatory outcomes in themselves contribute to sustainable economic growth, the way that regulators carry out their work in practice and interact with those they regulate can also make a significant contribution to supporting business and hence contributing further to sustainable economic growth. Good regulators seek to understand those they regulate, including taking economic and business factors appropriately into account in carrying out their regulatory activities*"
- b. **The evolution of our approach – achieved the right 'sense of balance' in taking into account wider interests.** Our approach has evolved from a systematic/analytical assessment of wider interests (that would necessitate adjustment of our decision/advice) to an approach that takes account wider interests at all stages of our work. This shift reflects the challenge of attaining the necessary evidence to support such an assessment and has brought the behavioural needs of our balancing duty to the fore – listening to, understanding and showing empathy with other interests. The approach also reflects that we pursue much of work through engagement and collaboration.

The evolution also takes into account that it is easier to 'balance' and resolve issues/seek solutions as early as possible in the land use/management process. This is helping to provide certainty for investment and reducing the risk of having to moderate our advice later.

- c. **The need to convey our duty is an easier to understand way.** We want to refresh the wording for both internal and external audiences. This will reiterate that the duty applies to all our work and set out the process for documenting our thinking beyond our planning work, for example, in deer management where we are the decision-taker.

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Use the Natura proforma as a framework for considering this question. If there is a likely significant effect on the qualifying interests then it is important to explain the connection between the proposal and the qualifying interests: how a specific aspect of the proposal could affect a specific qualifying interest and if possible explain the likely scale and nature of that effect.

N3) Can it be ascertained that the plan or project will not adversely affect the integrity of the site?

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Scottish Planning Policy states that *"development that affects a SSSI should only be permitted where it will not adversely affect the integrity of the area or the qualities for which it has been designated"*. In terms of responding to a planning consultation, the key question to address with regard to the impacts of a proposal on a SSSI is therefore:

"Will it affect the integrity of the area or the qualities for which it has been designated?"

In answering this question we should consider:

- impacts on the natural features of a site (direct and indirect)
- the extent to which adverse impacts undermine the management objectives for a site as set out in the Management Statement
- the extent to which impacts of a development might affect the condition of the site's natural features
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- Loss of or damage to any one feature cannot rationally be justified by the survival of the larger fraction since, once the process has begun, there are no logical stopping points. The setting of arbitrary limits to incursion would merely undermine the consistency of approach that is the credible basis for SSSI selection.
- SSSIs should be in favourable condition continuously to fulfil their purpose.

It is also essential to establish the likely permanence of adverse impacts. We may be able to avoid objecting to proposals where the natural features that experience short-term damage or a disturbance event can recover within one breeding or growing season without intervention. In addition, minor interventions or changes can sometimes effectively avoid damage or ensure that the condition of the site recovers quickly.

Exceptions to this could be acceptable in relation to major/national developments that take many years to complete and have substantial wider public benefit. In these cases, it might be reasonable to accept that the condition of the natural features of a site might be depressed for longer, provided measures were in place to secure swift recovery once the construction was completed. In these circumstances it would also be reasonable to expect the developer to put in place measures that would compensate for the temporary loss of favourable condition for the duration of the construction, preferably in an area close to the site.

Where natural features are already in unfavourable condition our advice should promote recovery. We should consider objecting to damaging proposals in such circumstances.

From: Keith.Connal@gov.scot
Sent: Sunday, 19 February 2017 20:27
To: Nick Halfhide
Cc: Ian Jardine; Jan.Anderton@gov.scot
Subject: RE: 2017 01 27 - Coul Links - briefing for SG - 27 January 2017 (A2194186)

Nick

Pending us catching up on this, could you give some thought to any off-the-shelf SNH documents which potentially would help give Liz Ditchburn some background on the approach adopted by SNH to considering a potential development involving a SSSI and a European protected area. In particular, it would be good if she could see anything that is written down about SNH's balancing duties in the founding legislation and the consideration which SNH needs to give as a result of the Better Regulation legislation.

Liz won't want to wade through reams of material but equally she has said she is happy to receive 'raw' material rather than troubling officials in SG or SNH to write lots of bespoke briefing.

Are there documents which come to mind which might fit the bill?

Thanks

Keith

From: Nick Halfhide [<mailto:Nick.Halfhide@snh.gov.uk>]
Sent: 19 February 2017 15:15
To: Connal K (Keith)
Cc: Ian Jardine; Anderton JM (Jan)
Subject: Re: 2017 01 27 - Coul Links - briefing for SG - 27 January 2017 (A2194186)

Keith

Thanks for this update. I will keep 15th March free. Happy to discuss before then.

Nick

Sent from my BlackBerry 10 smartphone.

From: Keith.Connal@gov.scot
Sent: Friday, 17 February 2017 18:50
To: Nick Halfhide
Cc: Ian Jardine; Jan.Anderton@gov.scot
Subject: RE: 2017 01 27 - Coul Links - briefing for SG - 27 January 2017 (A2194186)

Update

Nick – briefly, just to say that DG Economy is indeed going to engage on this and convene a meeting with the developer, SNH, HIE and VS. Looking at 15 March in Inverness, hosted by HIE.

I suggest we arrange a call to discuss but I thought it would be helpful to let you know now of the thinking here.

Ian, we checked your availability with Liz today for a 1-1 meeting with Liz next week, as part of her induction as I don't think she has engaged directly with SNH yet and partly to chat about this development. One of the reasons she is getting involved is to learn more about the way in which planning operates and in particular about the approach to balancing economic and environmental factors, including in relation to matters where the Directives are relevant.

Keith

.....

Nick

The briefing was indeed helpful, thanks. No follow up needed immediately, but it's possible, especially in light of the developer's decision not to proceed meantime with a planning application, that the SG (perhaps in the guise of DG Economy) might wish to engage with this. I am awaiting further word from Liz Ditchburn and I will come back to you then.

Regards

Keith

From: Nick Halfhide [<mailto:Nick.Halfhide@snh.gov.uk>]
Sent: 06 February 2017 15:27
To: Connal K (Keith)
Cc: Ian Jardine
Subject: FW: 2017 01 27 - Coul Links - briefing for SG - 27 January 2017 (A2194186)

Keith

I hope you found this briefing helpful. I was wondering if there is any follow up you require.

Happy to discuss on the phone if that would be more convenient.

Nick

Nick Halfhide
Director of Operations
Scottish Natural Heritage


01463 725224

From: Ian Bray
Sent: 27 January 2017 16:24
To: Keith Connal (keith.connal@scotland.gsi.gov.uk)
Cc: Dave Mackay; David Patterson; Kristin Scott; Ian Jardine; Nick Halfhide; SNHGOVERNMENT_RELATIONS
Subject: 2017 01 27 - Coul Links - briefing for SG - 27 January 2017 (A2194186)

Dear Keith

Please find attached a briefing on the Coul Links golf course.

Please come back to me should you require any further information.

Thanks

Ian

Ian Bray | Operations Manager | Scottish Natural Heritage | Strathallan House | Castle Business Park | Stirling | FK9 4TZ | Mobile [REDACTED] | ian.bray@snh.gov.uk

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mearachd, cuiribh fios dhan manaidsear-siostaim no neach-
sgrìobhaidh.

Thoiribh an aire airson adhbharan gnothaich, 's dòcha gun tèid
sùil a chumail air puist-dealain a' tighinn a-steach agus a' dol a-
mach bho SNH.

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Dh'fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh'fhaodadh nach eil beachdan anns a' phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.

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Thoiribh an aire airson adhbharan gnothaich, 's dòcha gun tèid sùil a chumail air puist-dealain a' tighinn a-steach agus a' dol a-mach bho SNH.

Rhoda Davidson

From: Ian Jardine
Sent: 03 March 2017 11:23
To: 'Liz.Ditchburn@gov.scot'
Cc: 'DGEconomy@gov.scot'; 'Keith.Connal@gov.scot'; Liz Colmer; 'director.enfor@gov.scot'; Nick Halfhide
Subject: RE: Coul

Hi Liz,

I'm delighted you will be able to visit Great Glen House on the 8th. I plan to be there when you arrive. As you probably know, the Crofting Commission are in the same building if you wanted to say hello to them too.


I wasn't planning to go on the site visit. We are checking that Nick is available but he is on leave just now. The original plan had been for Dave Mackay, our local Operations Manager, to lead for us on the site visit but I am sure Nick will want to be there if he can. However I can also see that meeting the local staff 'on the ground' could be an important part of seeing policy into practice.

I have checked Ian Ross's diary and it looks like he would be able to attend on the 16th. Let me know if there is anything we can help with for your visit, or more generally,

Regards,

Ian

Ian Jardine, Chief Executive
Scottish Natural Heritage

 +44 (0)1463 725001

 ian.jardine@snh.gov.uk

 www.snh.gov.uk

 Please consider the environment before printing this email

From: Liz.Ditchburn@gov.scot [<mailto:Liz.Ditchburn@gov.scot>]
Sent: 03 March 2017 08:31
To: Ian Jardine
Cc: DGEconomy@gov.scot; Keith.Connal@gov.scot; Liz Colmer; director.enfor@gov.scot
Subject: Coul

Hi Ian

Thanks very much for meeting the other day – good to meet you properly and it really helped me start to understand SNH as an organisation and to increase my understanding of the frameworks in which you operate, and how that really feels in practice to implement them.

I mentioned that I had considered convening stakeholders at the site for the meeting, but had thought perhaps it wasn't helpful to descend en masse. You said that of course I could always visit before and that SNH would be glad to take me through the issues in terms of protection and science on site. I would very much like to take you up on that offer. I understand that there had already been a proposal for Nick H to meet up with the ecologist from the developer on the 8th – I'd like to join that to

really understand the issues on the ground before the meeting. Can we make that work? From their perspective, the developer has said they are fine with that. Perhaps I could also take the opportunity to meet people in your Inverness office – a working proposal would be that I would come up the night before so could start with you first thing in the morning and then go to the site with Nick or whoever else would be appropriate.

In terms of the meeting on the 16th, you said you wanted Nick to be there as the person with the most detailed knowledge, which seems absolutely right. We've also now had confirmation from Lorne Crerar and Lord Thurso so I'd like to make sure we invite Ian Ross too, alongside Nick (I'm not sure we had done that earlier). We'll do that from here (DG office to action please)

Looking forward to learning more about SNH. As we discussed, Coul is just one specific case amongst the many you deal with all the time – but amongst other things, it is a useful example to illustrate broader issues, and for me personally, to see policy into practice.

Warm regards

Liz

Liz Ditchburn
Director General Economy
Scottish Government
Tel: 0131 244 [REDACTED]
Mob: [REDACTED]
DGEEconomy@gov.scot

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Dh'fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh'fhaodadh nach eil beachdan anns a' phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.

Rhoda Davidson

From: Damon.Hewlett@gov.scot
Sent: 07 March 2017 08:54
To: Liz Colmer
Cc: Christina.Kopanou@gov.scot; Dave Mackay; David Patterson
Subject: RE: Visit to GGH / Coul Links - 8 March 2017

Liz – many thanks for this, I think having the option of the facilities at Golspie if necessary on the day would be ideal.

Damon

Damon Hewlett

DG Economy and DG Finance | Scottish Government | 0300 244 [REDACTED] / [REDACTED]

From: Liz Colmer [mailto:Liz.Colmer@snh.gov.uk]
Sent: 06 March 2017 16:01
To: Hewlett D (Damon)
Cc: Kopanou C (Christina); Dave Mackay; David Patterson
Subject: RE: Visit to GGH / Coul Links - 8 March 2017

Hi Damon

With regards to changing facilities, Dave Mackay mentioned the possibility of using the farmhouse at Coul but that would be a question for Todd Warnock or Peter Cosgrove, as we're not sure if it's occupied and how that might work.

We can offer the use of the shower room at our Golspie Office, should Ms Ditchburn need to change afterwards, which is reasonably near to the site.

Best regards

Liz

Liz Colmer | Co-ordinator to the CEO

Scottish Natural Heritage | Great Glen House | Leachkin Road | Inverness | IV3 8NW
t: 01463 725003 (direct line)
e: liz.colmer@snh.gov.uk

From: Damon.Hewlett@gov.scot [<mailto:Damon.Hewlett@gov.scot>]
Sent: 06 March 2017 15:41
To: Liz Colmer

Cc: Dave Mackay; David Patterson; Stuart MacQuarrie; Christina.Kopanou@gov.scot

Subject: RE: Visit to GGH / Coul Links - 8 March 2017

Liz – many thanks again. As discussed, we will recommend to Liz D that she doesn't pursue a meeting with HIE at the end of the day, to keep things simpler and to build in some contingency.

And thanks for agreeing to look into the matter of changing facilities etc any advice or info would be appreciated.

Damon Hewlett

DG Economy and DG Finance | Scottish Government | 0300 244 [REDACTED] / [REDACTED]

From: Liz Colmer [<mailto:Liz.Colmer@snh.gov.uk>]

Sent: 06 March 2017 15:29

To: Hewlett D (Damon)

Cc: Dave Mackay; David Patterson; Stuart MacQuarrie; Kopanou C (Christina)

Subject: RE: Visit to GGH / Coul Links - 8 March 2017

Hi Damon

To confirm, Dave Mackay will liaise with the developers to run the site visit between 11:00 – 15:00, to allow Liz Ditchburn to be included in both elements of the site visit with, a view to being back into Inverness for 16:00 for a meeting with HIE.

Journey time between Inverness and Dornoch may be slightly over the hour.

We will adjust the GGH visit to 08:30 – 10:00.

Best regards

Liz

Liz Colmer | Co-ordinator to the CEO

Scottish Natural Heritage | Great Glen House | Leachkin Road | Inverness | IV3 8NW

t: 01463 725003 (direct line)

e: liz.colmer@snh.gov.uk

From: Damon.Hewlett@gov.scot [<mailto:Damon.Hewlett@gov.scot>]

Sent: 06 March 2017 15:16

To: Christina.Kopanou@gov.scot; Liz Colmer

Cc: Liz.Ditchburn@gov.scot; DGEconomy@gov.scot

Subject: RE: Visit to GGH / Coul Links - 8 March 2017

Liz (Colmer) – as discussed a moment ago, helpful if Liz could participate in both elements of the site visit ie the dune heath part and the subsequent general discussion (we agreed that minor time adjustments plus allocating one hour for the journey (assuming I've got that right!) could enable this.

Also, if you are able to give us a steer on eta back in Inverness that would be much appreciated, you kindly agreed to look into this and respond in 30 mins or so.

Thanks again

Damon

Damon Hewlett

DG Economy and DG Finance | Scottish Government | 0300 244 [REDACTED] / [REDACTED]

From: Kopanou C (Christina)
Sent: 06 March 2017 14:55
To: 'Liz Colmer'
Cc: Ditchburn L (Liz); Hewlett D (Damon); DG Economy
Subject: RE: Visit to GGH / Coul Links - 8 March 2017

Dear Liz,

Thank you for organising this plan. Liz need to get the train to Edinburgh at 17:30

Regards,

Christina

From: Liz Colmer [<mailto:Liz.Colmer@snh.gov.uk>]
Sent: 06 March 2017 14:48
To: Kopanou C (Christina)
Subject: Visit to GGH / Coul Links - 8 March 2017

Dear Christina

As discussed, I am still waiting for confirmation on a couple of aspects of Liz Ditchburn's visit to Great Glen House (GGH) and the Coul Links site visit, however this is the outline plan:

08:30 – Ian Jardine to meet Liz Ditchburn and show her around GGH
09:15 – Meet with local SNH Management Team members
10:00 – Meet with the Crofting Commission
10:30 – Nick Halfhide and Liz Ditchburn to travel to Coul Links to meet Dave Mackay, David Paterson, Peter Cosgrove (and others) at Coul Farmhouse for 12:00.

With regards to the site visit at Coul Links; the plan is for Dave Mackay and David Patterson from SNH to meet with the consultants (Peter Cosgrove and others) at 10am to discuss Dune Heath. Liz Ditchburn and Nick will join this meeting on their arrival to have a look at the whole sand dune system and carry on the discussions.

This is a map link to our office location in Inverness:

<https://www.google.co.uk/maps/place/Scottish+Natural+Heritage/@57.4663269,-4.2743679,17z/data=!3m1!4b1!4m5!3m4!1s0x488f73977db68dc1:0x4a1d30a44e7a126d!8m2!3d57.466324!4d-4.2721739> and attached is a map of the meeting point at Coul Links Farmhouse.

Strong winds and showers have been forecast, so Ms Ditchburn will need waterproof clothing/shoes or boots, as well as a packed lunch.

Can you advise when Liz Ditchburn needs to be back in Inverness for onwards travel to Edinburgh? Will she be travelling by train or car?

Nick is on leave until tomorrow, so once I have spoken to him I will confirm the above.

Please let me know if you have any queries or problems with the proposed programme.

Best regards

Liz

Liz Colmer | Co-ordinator to the CEO

Scottish Natural Heritage | Great Glen House | Leachkin Road | Inverness | IV3 8NW
t: 01463 725003 (direct line)
e: liz.colmer@snh.gov.uk

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mearachd, cuiribh fios dhan manaidsear-siostaim no neach-
sgriobhaidh.

Thoiribh an aire airson adhbharan gnothaich, 's dòcha gun tèid

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Dh'fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh'fhaodadh nach eil beachdan anns a' phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.

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From: David Patterson
Sent: 07 March 2017 16:47
To: 'Steven.dora@scotland.gsi.gov.uk'
Cc: Ian Bray; Kristin Scott; Nick Halfhide; Dave Mackay
Subject: Golf course layout with SSSI boundary - January 2017 - Coul Links Golf Course - Loch Fleet SSSI - 13 February 2017 (A2207596)

Hi Steven,

Thanks for your query regarding the Coul Links Golf Course proposal – answers provided below.

- We assess the impact on the integrity of a SSSI using our guidance (see Annex below). Our full Development Management guidance can be found at <http://www.snh.gov.uk/docs/B699305.pdf>.
- Each case will be assessed on a site by site basis, using the above approach and applying professional judgement. There is no set threshold as such.
- This proposal is at pre-application (Stage 1 – EIA) and has been through EIA scoping. The developer is still collecting information for inclusion within an Environmental Statement, for example hydrological surveys. The proposal involves construction of an 18 hole championship golf course (top 50 in the world). The proposed development comprises a golf course and supporting facilities and infrastructure, as follows:
 - A new access road into the course
 - Car parking
 - Club house
 - Professional's shop
 - Refurbishment of existing buildings
 - New sheds for course maintenance equipment
 - Golf practice area
 - Irrigation system
 - Possible bore hole for irrigation water
 - Improved amenity area north of Embo
 - Upgrading footpath network across the links; and
 - Two tourist information points along the former railway line [currently used by walkers]

Annex - SSSI site integrity information from the Development Management Guidance.

Scottish Planning Policy states that “*development that affects...a SSSI...should only be permitted where it will not adversely affect the integrity of the area or the qualities for which it has been designated....*”. In terms of responding to a planning consultation, the key question to address with regard to the impacts of a proposal on a SSSI is therefore:

“Will it affect the integrity of the area or the qualities for which it has been designated?”

In answering this question we should consider:

- impacts on the natural features of a site (direct and indirect)
- the extent to which adverse impacts undermine the management objectives for a site as set out in the Management Statement
- the extent to which impacts of a development might affect the condition of the site's natural features

- the permanence of the impacts, and
- impacts in combination with other proposals or activities.

In reaching a conclusion about the importance of the impacts, it may be helpful to consult the site attribute table in order to judge the magnitude of an impact in relation to key indicators. This will also help ensure that you don't miss possible indirect effects on natural features, or effects that might take years to manifest.

Decision-makers sometimes struggle to understand why small losses to a site or temporary losses of quality are important and you should therefore take care to explain this in simple terms.

The following concepts are important here:

- Once designated all parts of a SSSI (the whole site) collectively assume the minimum standard of "special interest". This is why damage to one small bit of the site affects the site's 'integrity' or 'wholeness'.
- Loss of or damage to any one feature cannot rationally be justified by the survival of the larger fraction since, once the process has begun, there are no logical stopping points. The setting of arbitrary limits to incursion would merely undermine the consistency of approach that is the credible basis for SSSI selection.
- SSSIs should be in favourable condition continuously to fulfil their purpose.

It is also essential to establish the likely permanence of adverse impacts. We may be able to avoid objecting to proposals where the natural features that experience short-term damage or a disturbance event can recover within one breeding or growing season without intervention. In addition, minor interventions or changes can sometimes effectively avoid damage or ensure that the condition of the site recovers quickly.

Exceptions to this could be acceptable in relation to major/national developments that take many years to complete and have substantial wider public benefit. In these cases, it might be reasonable to accept that the condition of the natural features of a site might be depressed for longer, provided measures were in place to secure swift recovery once the construction was completed. In these circumstances it would also be reasonable to expect the developer to put in place measures that would compensate for the temporary loss of favourable condition for the duration of the construction, preferably in an area close to the site.

Where natural features are already in unfavourable condition our advice should promote recovery. We should consider objecting to damaging proposals in such circumstances.

From: Steven.Dora@gov.scot [<mailto:Steven.Dora@gov.scot>]

Sent: 07 March 2017 10:46

To: David Patterson

Cc: Dave Mackay; Ian Bray

Subject: RE: Golf course layout with SSSI boundary - January 2017 - Coul Links Golf Course - Loch Fleet SSSI - 13 February 2017 (A2207596)

Hi Dave

Further to my call, I'm looking for some quick lines as follows:

- how SNH assesses the impact on the integrity of a SSSI
- what the threshold is for impact to be likely to lead to SNH objection
- the current status of the proposal & a description of the proposal (based on what the developer has imparted thus far)

I don't need a lot of detail, am just looking for something to incorporate into a briefing note (which is already too long).

Thanks,

Steven

0131 244 [REDACTED]

-----Original Message-----

From: David Patterson [<mailto:David.Patterson@snh.gov.uk>]

Sent: 27 February 2017 08:17

To: Ian Bray; Dora S (Steven)

Cc: Dave Mackay

Subject: Golf course layout with SSSI boundary - January 2017 - Coul Links Golf Course - Loch Fleet SSSI - 13 February 2017 (A2207596)

Hi Ian & Steven,

Please find attached a map showing the golf course layout (Jan 2017 version) in context to Loch Fleet SSSI. The boundary of the SSSI is coincident with the boundary of Dornoch Firth & Loch Fleet SPA at this location.

Drop me a line or give me a call if you need further assistance.

Thanks,

David.

David Patterson

Operations Officer - Sutherland

Scottish Natural Heritage - The Links - Golspie Business Park - GOLSPIE - Sutherland - KW10 6UB.

Please note, I normally work Mon-Thurs only.

Direct Dial - 0300 067 3108.

SNH Reception - 0300 067 6841

David Patterson has sent you a copy of "Golf course layout with SSSI boundary - January 2017 - Coul Links Golf Course - Loch Fleet SSSI - 13 February 2017" (A2207596) v1.0 from Objective.

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Thoiribh an aire airson adhbharan gnothaich, 's dòcha gun tèid sùil a chumail air puist-dealain a' tighinn a-steach agus a' dol a-mach bho SNH.

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Tha am post-d seo (agus faidhle neo ceanglan còmhla ris) dhan neach neo luchd-ainmichte a-mhàin. Chan eil e ceadaichte a chleachdadh ann an dòigh sam bith, a' toirt a-steach còraichean, foillseachadh neo sgaoileadh, gun chead. Ma 's e is gun d'fhuair sibh seo le gun fhiosd', bu choir cur às dhan phost-d agus lethbhreac sam bith air an t-siostam agaibh, leig fios chun neach a sgaoil am post-d gun dàil.

Dh'fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh'fhaodadh nach eil beachdan anns a' phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.

Coul Links meeting

March 16th 2017, 11.00 a.m to 1.00 p.m

St Andrew's House.

Agenda

1. Welcome and introductions, scene setting: *Liz Ditchburn*

1. Presentation from the developer of their vision and approach to the potential development and its subsequent management. *Todd Warnock*

2. Economic development perspective. View from HIE as to where such a development would sit in the local, regional and national economic development context, including what would be necessary to realise the potential economic and social benefits. *Charlotte Wright*

3. The tourism perspective. View from Visit Scotland as to where such a development would sit in the local, regional and national tourism context, including what would be necessary to realise the potential tourism benefits. *Lord Thurso*

4. The environmental perspective. View from SNH as to the importance of the natural asset, the protections in place and appropriate mitigations / approaches to stewarding the natural asset and maintaining its value. *Ian Ross / Nick Halfhide*

5. Discussion

File Note: Coul Links**Meeting of SG and Key Agencies in Edinburgh on 16th March 2017**

This meeting was attended by senior representatives from Scottish Government Rural Economy, Planning, and Natural Resources, VisitScotland, HIE, SNH and the developer. It was chaired by Liz Ditchburn, SG DG Economy.

The aim of the meeting was to share understanding and perspectives. The Chair was clear to establish that the meeting was not part of the formal planning process.

The meeting consisted of a presentation by the developer followed by discussion from the different interests represented considering the economic, environmental and social impact of the proposed development.

The developer's team committed to deliver two actions by 15th April:

- Further detail on the proposed construction and management approach, along with more detail of the impact of two of the holes on dune heath
- Further detail on the conservation measures being proposed as part of the development.

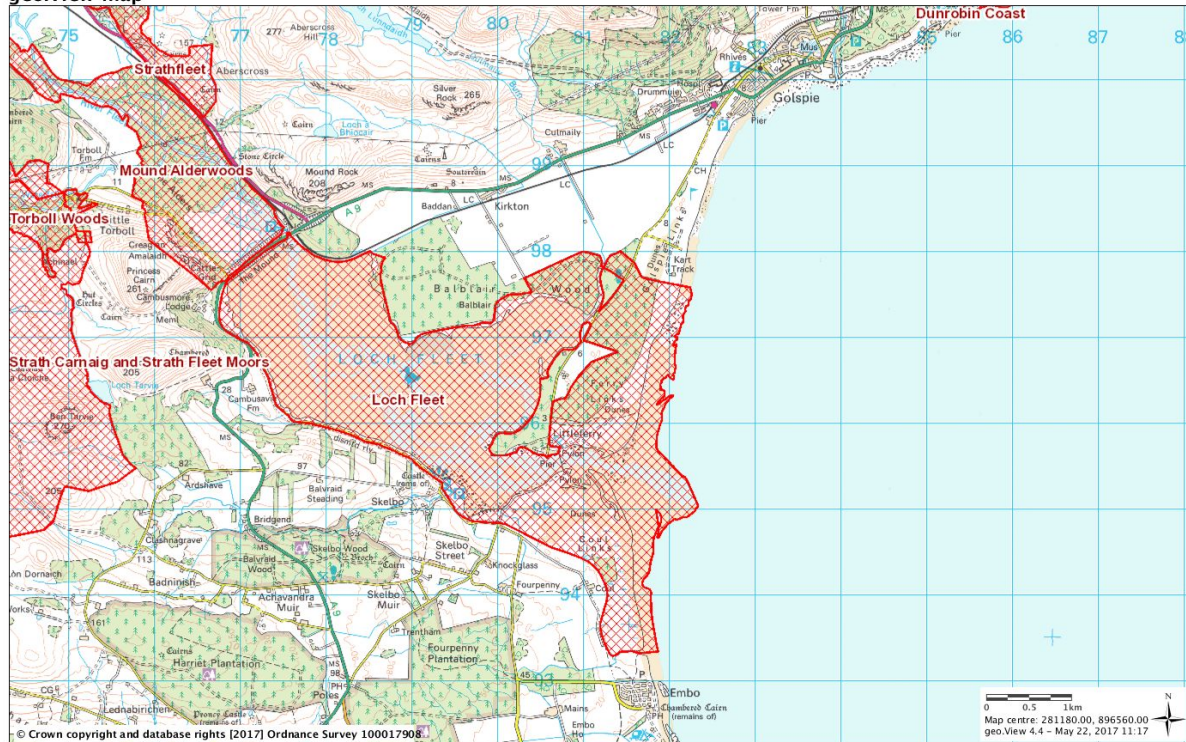
Nick Halfhide

March 2017

Loch Fleet SSSI - Briefing

Loch Fleet SSSI is located on the east coast of Sutherland, between the settlements of Embo and Golspie (see map). The SSSI is nationally important for a diverse range of habitats and species of birds and rare plants, including native pinewood and a number of coastal habitats. The SSSI is also a component part of the Dornoch Firth and Loch Fleet SPA, classified for a number wintering birds and breeding osprey that occur in internationally important numbers.

geo.View map



 Scottish Natural Heritage
Dualchas Nàdair na h-Aibha

The proposed golf course is located within Coul Links, one of two sand dune systems within the SSSI (Coul Links = 137ha; Ferry Links = 69ha). Part of the golf course is located outwith the SSSI. The two sand dune systems are separated by the Loch Fleet tidal basin, with Coul Links to the south and Ferry Links to the north. Behind the high dune ridge at Coul Links there is an extensive dune slack which runs along a significant proportion of the dune ridge, which often floods during winter and is used by feeding/roosting SPA ducks. As the proposal involves a significant amount of excavation and re-profiling, including 56k cubic metres of sand and up to 2m (raising & lowering) in some cases, this is likely to alter the hydrology of the dune system, resulting in changes to plant communities.

A number of SSSI interests are not present within Coul Links and would not be impacted by the proposed golf course (see table). The interest present within Coul Links which would be impacted most by the golf course is sand dune. Estimated figures for direct (habitat loss) and indirect (habitat modification) sand dune loss based on the latest details from the developer are provided in the table below. Indirect impacts are particularly important as the golf course layout runs throughout the dune system of Coul Links, so impacts are not restricted to part of the system, but throughout. For comparison purposes, direct sand dune loss for the Menie golf course was 25.1ha (12% of the sand dune SSSI area); there are no comparable figures for indirect impacts.

Loch Fleet SSSI table of interests (SSSI area: 1231.77ha)

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Sand dunes	206	Yes	Direct (15-20); Indirect + Direct (20-25)	Direct (7-10); Indirect + Direct (10-12)
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Vascular plant assemblage	N/A	No	Nil	N/A
Breeding bird assemblage	N/A	Yes	Impacts can be mitigated	N/A
Eider (non-breeding)	N/A	Yes	Impacts can be mitigated	N/A

To date discussions with the developer have focussed on dune heath (see table below), which is a component habitat of the sand dune, as this is where most extensive habitat change through turfing would be needed (i.e. change from heather to grass). More recently (April 2017), it has been indicated more extensive areas of dune would also need to be turfed, including paths, fairways and some areas of rough. Previously it had been indicated such areas would simply be mown and existing plant communities left unchanged.

Table showing Annex 1 habitats that will be directly affected by the golf course footprint, based on habitat data provided by Alba Ecology (Nov 2016 & Jan 2017)

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Atlantic decalcified fixed dunes*	Dune heath	5.79
Humid dune slacks	Dune slacks	1.93
Coastal dunes with <i>Juniperus spp</i> *	Dunes with Juniper	0.25
Totals	All dune Annex 1 habitats	11.04

*Denotes priority habitat

From: [Nick Halfhide](#)
To: ["Steven.Dora@gov.scot"](mailto:Steven.Dora@gov.scot)
Cc: ["Keith.Connal@gov.scot"](mailto:Keith.Connal@gov.scot); David Patterson; ["Iain.Martin@gov.scot"](mailto:Iain.Martin@gov.scot); Dave Mackay
Subject: RE: Coul
Date: 22 May 2017 12:32:27
Attachments: [Coul Links - Loch Fleet SSSI - SG briefing - 22 May 2017.docx](#)

Steven

I attach some further briefing. I suggest you speak to Dave Mackay if you need to clarify any of the detail. He is on 0300 067 3107.

Nick

Nick Halfhide
Director of Operations
Scottish Natural Heritage


01463 725224

From: Steven.Dora@gov.scot [<mailto:Steven.Dora@gov.scot>]
Sent: 19 May 2017 17:46
To: Ian Jardine
Cc: Nick Halfhide; Keith.Connal@gov.scot; David Patterson; Iain.Martin@gov.scot
Subject: Coul
Importance: High

Ian

Apologies for the short notice but we've been asked (also at short notice) to provide an update on Coul by (late) Monday afternoon. Is there anything available which set outs the latest thinking on the predicted natural heritage impacts (% impact on notified features etc)?

Steven

From: David Patterson [<mailto:David.Patterson@snh.gov.uk>]
Sent: 30 January 2017 09:41
To: Dora S (Steven)
Subject: FW: 2017 01 27 - Coul Links - briefing for SG - 27 January 2017 (A2194186)

Hi Steven,

Please find attached briefing for your information, as discussed.

Please give me a call if you need further detail.

Kind regards,

David.

David Patterson
Operations Officer – Sutherland
Scottish Natural Heritage - The Links - Golspie Business Park - GOLSPIE - Sutherland - KW10
6UB.

Please note, I normally work Mon-Thurs only.

Direct Dial – 0300 067 3108.
SNH Reception – 0300 067 6841

From: Ian Bray
Sent: 27 January 2017 16:24
To: Keith Connal (keith.connal@scotland.gsi.gov.uk)
Cc: Dave Mackay; David Patterson; Kristin Scott; Ian Jardine; Nick Halfhide;
SNHGOVERNMENT_RELATIONS
Subject: 2017 01 27 - Coul Links - briefing for SG - 27 January 2017 (A2194186)

Dear Keith

Please find attached a briefing on the Coul Links golf course.

Please come back to me should you require any further information.

Thanks

Ian
[Ian Bray](#) | Operations Manager | Scottish Natural Heritage | Strathallan House | Castle Business Park | Stirling | FK9
4TZ | Mobile [REDACTED] | ian.bray@snh.gov.uk

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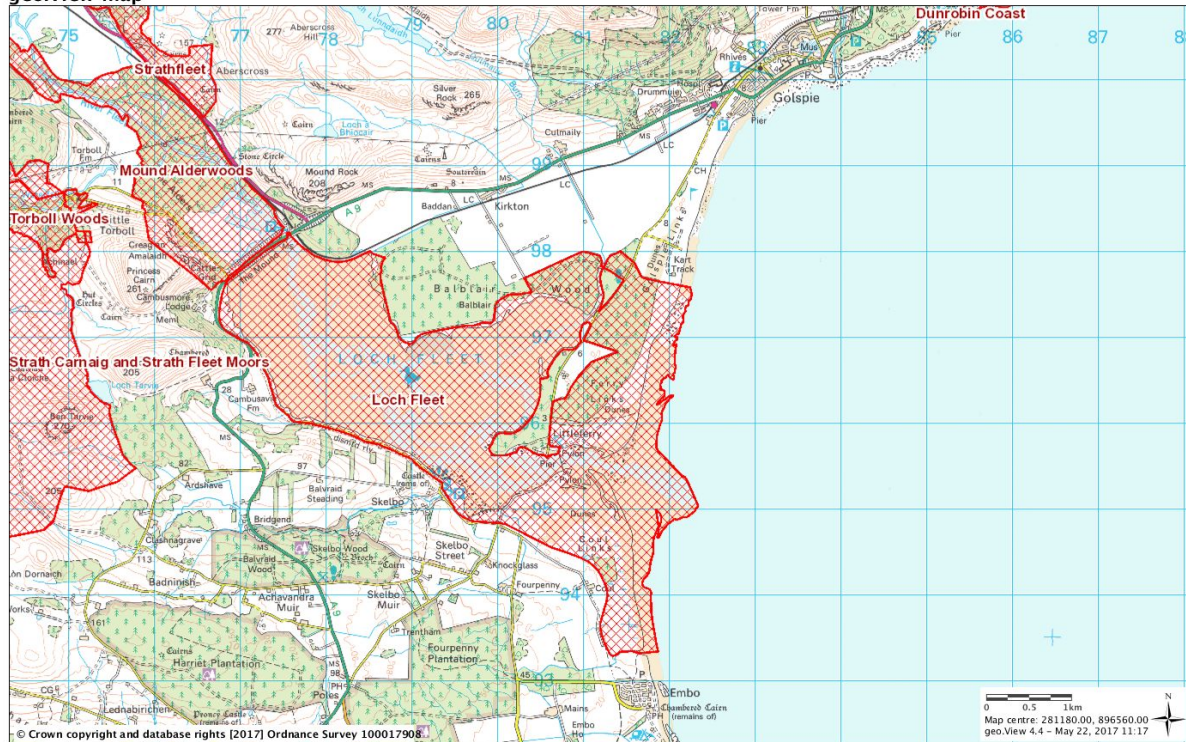
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Briefing on SNH's use of offsetting and Biodiversity Net Gain principles for the Chair meeting with the Cabinet Secretary

Definitions

SNH & 'Biodiversity Net Gain' – previous and current experience

Wider context

Stakeholders

Lessons learned and risks in relation to Coul Links

Definitions

Biodiversity offsetting – a tool for providing compensation for biodiversity losses from development. Offsetting involves measuring negative residual impacts on biodiversity from development and implementing measures to create (at least) equivalent gains (offsets), usually nearby.

Biodiversity Net Gain (BNG) – an approach that provides a set of tools – avoidance, mitigation and offsetting (the mitigation hierarchy) – to achieve net gain. Net gain can often be achieved by good design that avoids and/or minimises impacts and actively incorporates new elements that support biodiversity. Where the loss of biodiversity cannot be avoided or mitigated then developers can use biodiversity offsets to achieve the required outcome of 'biodiversity in a better state than before'. Offsetting is therefore only one of a range of ways that BNG can be achieved. It is not a requirement of BNG in and of itself.

The proposal at Coul Links is to offset loss and damage to an SSSI. One question is whether the developers have done all that they can to utilise the 1st two levels of the mitigation hierarchy. The accompanying 'Proposal for golf course at Coul Links – briefing' addresses this

SNH & 'Biodiversity Net Gain' – previous and current experience

SNH's previous involvement in offsetting proposals has been driven on a case by case basis and can be divided into four types of situation

- Wind Farms and Habitat Management Plans
- Other links golf courses
- Nationally important infrastructure
- Natura – compensation measures

1. Wind Farms and Habitat Management Plans

SNH has published guidance on Habitat Management Plans. The guidance is on content and process and not on whether one is required

Scottish Borders Council - The most prominent example of biodiversity offsetting in Scotland is a series of projects to deliver offsets in the Scottish Borders. The scheme was developed by Scottish Borders Council (SBC) in partnership with Scottish & Southern Energy (SSE). The first offsets were developed in 2006 and related to wind farms and Black Grouse habitats. The

scheme is aimed at offsetting impacts on locally important biodiversity, not nationally important protected areas.

2. Other links golf courses on SSSIs

In most of these cases, the potential SSSI damage, whilst small, would have been significant. The need for objections was overcome by generous offsets involving habitat translocation and/or land management. Generally, the gains have been much larger than potential losses. The Machrihanish case involved larger scale impacts but the net benefits were still very significant at the end of the day. There are other examples but these are the best.

Course: Royal Troon (Troon Golf links and Foreshore SSSI, South Ayrshire)
Impacts on site: Proposal to move/realign holes and fairway. About 0.5ha of fixed dune grassland/heath affected. The SSSI was already a golf course at the time of designation. The grassland was under long-term, low intensity, management.
How significant were the impacts (please specifically refer to site integrity in terms of both SSSI integrity and Natura integrity): Proposal would have had an effect on site integrity.
Summary of SNH advice: The proposal included careful large scale habitat translocation. Long period of pre-application discussion addressed all the technical issues and enabled the planning consent to be supported by appropriate conditions.
Outcome: Habitats were translocated successfully. Minimal impacts.

Course: Renaissance (Firth of Forth SSSI, West Lothian)
Impacts on site: Three new fairways and greens on sand dune feature partly within SSSI (approx. 4 ha). Most of the proposed new playing areas within the SSSI were in poor condition. The proposal was to remove 4ha of buckthorn – half to become new playing areas, half to be restored to dune grassland. Only 0.1ha of good dune grassland would be lost to development.
How significant were the impacts (please specifically refer to site integrity in terms of both SSSI integrity and Natura integrity): Proposal would have had an effect on site integrity.
Summary of SNH advice: We agreed to the above proposal after considerable discussion and revisions. Our acceptance of the proposal hinged on the production and implementation (conditioned) of a detailed management plan for the remainder of the courses 99 year lease.
Outcome: Consented and constructed as per the proposal outlined above. Buckthorn successfully removed and dune grassland (rough) successfully re-established. A further 21ha of SSSI dunes to be managed for ongoing removal of scattered sea buckthorn.

Course: Machrihanish Dunes golf course (Machrihanish Dunes SSSI, Kintyre)
Impacts on site: The SSSI was in unfavourable condition and required grazing management.
<ul style="list-style-type: none"> Habitat loss – tees and greens -1.1ha

<ul style="list-style-type: none"> • Habitat modified – fairways - 13.8ha • Habitat management – out of play - 58.9ha
<p>How significant were the impacts (please specifically refer to site integrity in terms of both SSSI integrity and Natura integrity): Proposal would have had an effect on site integrity.</p>
<p>Summary of SNH advice: Long and complex case with extensive discussions with developer to come to best solution for the golf course and the SSSI. The key advice in relation to offsetting was to improve management of the non-playing areas by seasonal grazing.</p>
<p>Outcome: The final iteration, which SNH agreed to, involved minimal earthworks, minor damage, some modifications and a very positive commitment to a full Management Plan which protected and enhanced the out of play areas which form the vast majority of the golf course.</p>

3. Nationally important infrastructure

The public benefits from some projects are so great that they clearly outweigh their negative impacts on the natural heritage. SNH clearly has a role to enable these sorts of development while minimising impacts on important natural heritage. Objecting is not an option in such cases.

A9 dualling – This is an example of a project supported by NPF3. SNH has worked with Transport Scotland, the Forestry Commission and the Cairngorms National Park to plan and deliver better management of a range of native and non-native woodlands in proximity to the A9 to compensate for the loss of some ancient semi-natural woodland along the route. One example involved the loss of a small amount of riparian woodland at Alvie SSSI near Aviemore. To address the loss of this area of the SSSI, part of an adjacent coniferous plantation was removed and management put in place to encourage regrowth of riparian woodland.

4. Natura compensation measures

Natura legislation contains specific requirements for compensation. Article 6.4 of the Habitats Directive requires that where plans or projects which may have an adverse effect upon the integrity of a Natura site must be carried out for imperative reasons of over-riding public interest, the Member State must take appropriate compensatory measures to ensure that the overall coherence of the Natura network is maintained.

Proposed A830 Arisaig to Loch Nan Uamh Trunk Road Improvement – This major road improvement was approved for imperative reasons of over-riding public interest and resulted in loss of 7.9 ha of qualifying oak woodland habitat within Glen Beasdale SAC. An adjacent area (20ha) was identified as suitable replacement habitat with appropriate management measures put in place.

What is the wider context for these cases?

- Scottish Planning Policy (para. 192) states that: ‘the planning system should seek benefits for biodiversity from new development where possible, including the restoration of degraded habitats and the avoidance of further fragmentation or isolation of habitats’

- There is no dedicated guidance to help SNH decide whether offsetting is appropriate, what form it should take or how much gain is required to offset losses. This is important because the nature of gains may not be identical to the losses.
- SNH is a partner in biodiversity off-setting research planned for 2018 under the Scottish Government Rural Affairs, Food and the Environment (RAFE) Strategic Research Programme. Work in progress and planned will assess current BNG practice, design new options and test potential implementation of these to assess their implications and the perceptions of end-users and stakeholders.
- The Chartered Institute for Environmental and Ecological Management (CIEEM), in partnership with the Construction Industry Research and Information Association (CIRIA) and the Institute of Environmental Management and Assessment (IEMA), has recently developed some high level principles on BNG, which include guidance on when offsets might be appropriate. The correct application of the mitigation hierarchy (avoid impacts, then mitigate impacts and then compensate as a last resort) is at the core of these principles. We will explore with CIEEM how we might contribute to their 'practice guidance' on implementing BNG principles, which is currently in preparation.
- A review of SNH's experience with offsetting suggests that we take opportunities either (rarely) because it is required under Natura legislation, or (also rarely) if it can improve development that will go ahead anyway because it is so important, or (more often) it offers an opportunity to apply new resources to an unsatisfactory situation and results in a clear biodiversity gain.

Stakeholders

- SNH doesn't have a clear and definitive picture of stakeholders' views.
- Most available feedback is in respect of proposals to apply the principles of BNG/offsetting systematically. This is not the case with Coul Links. Nevertheless we can take some indications from the views available.
- Stakeholder views on the DEFRA pilots of biodiversity offsetting are very mixed and divided about 50/50 between pro and against. The public were especially negative.
- Views were requested on biodiversity offsetting as part of the consultation for "*2020 Challenge for Scotland's Biodiversity - A Strategy for the conservation and enhancement of biodiversity in Scotland*". There was quite a good response to the topic but support for biodiversity offsetting was varied. Several respondents acknowledged the potential benefits of the approach but very few supported it outright and most of the respondents talked about moving with extreme caution.
- The majority of stakeholders are very wary of applying offsetting to protected areas.
- A quick survey of the internet reveals a huge weight of views against or sceptical of offsetting. This is not a scientific survey and is likely biased towards detractors who will be more vocal.

- Many, possibly a majority of, stakeholders are sceptical of the value of offsetting, especially in the absence of an agreed framework and of agreed standards. Opportunistic offsetting presents additional risks.

Lessons learned and risks in relation to Coul Links

The **potential benefits** to the SSSI from the positive works proposed by the developer are summarised in the accompanying '*Proposal for golf course at Coul Links – briefing*'. Some of these benefits can be delivered with a high degree of certainty – others less so. It does offer a potential opportunity to apply new resources to an unsatisfactory situation and achieve biodiversity gain. However...

- Fulfilling the requirements of the mitigation hierarchy (avoid, then mitigate, then compensate) is critical if the integrity of the planning system is to be maintained.
- Clearly, if the economic benefits from the proposal are of national significance these may outweigh the effects on the SSSI and SNH might not object. However, SNH is not an expert on the significance of economic and social benefits. Our approach is to rely on clear, unambiguous, documentary evidence that benefits are nationally significant e.g. National Development status. There is no such evidence on the benefits from this proposal. However, the planning authority, with Ministers, is in a position to make this judgement and could consent the golf course even if SNH objected. If this happened SNH would work with the developer to ensure satisfactory offset measures were implemented and maintained.
- Were offsetting to proceed at Coul we would have to agree the quantity of loss and the required gains to offset these. Sand dunes are complex systems and are difficult to replicate. The positive management measures would almost certainly not deliver habitats identical to those lost.
- The situation at Coul may be different to the situations at other sites where SNH has accepted and used offsetting to benefit SSSIs. In the other golf course proposals i.e. the situations most similar to Coul Links, the potential gains have been much greater than the predicted losses.
- There is little evidence that some of the rarer habitats at Coul (dune heath and slacks) can be successfully recreated and maintained in the long term. This also contrasts with earlier examples where certainty was high. Offsetting in these circumstances may be more akin to an experiment than a guaranteed delivery mechanism for no net loss of biodiversity.
- Achieving agreed outcomes is critical to successful offsetting. Although there are mechanisms such as S.75 agreements that can deliver them, we know from experience that commitment can wane and planning authorities usually lack the resources to enforce compliance.
- There is widespread opposition to the use of offsetting in the context of protected areas. Previous experience has probably been acceptable because of the scale of gains and losses and the overwhelming net benefit. This may not be the case at Coul. It is also the case that previous experience on protected areas has involved measures with a high degree of certainty for delivery of outcomes. It is clear that is not the case at Coul either.
- Although offsetting has been used previously (see examples) accepting it in the circumstances at Coul would open the door wider for future use. Is this

something that we wish to do before we have an agreed framework for BNG in Scotland? There seems to be a fairly wide consensus that an agreed framework and standards for offsetting is highly desirable and improves the chances of success.

COUL LINKS - LOCH FLEET SSSI - SG BRIEFING

Foveran Links SSSI – Menie Golf course

No part of Foveran Links SSSI has been denotified since the construction of the golf course at Menie Links. As part of its regular consideration of impacts of developments on SSSIs across Scotland, in due course SNH will carry out a review of the impact of the golf course on the scientific interest of the SSSI. Depending on the outcome, the broad options are to take no action or consider de-notification and removal of damaged areas from the SSSI boundary.

Loch Fleet SSSI – Proposal for Golf course at Coul Links

Loch Fleet SSSI is located on the east coast of Sutherland, between the settlements of Embo and Golspie. The SSSI is nationally important for a diverse range of habitats and species of birds and rare plants, including native pinewood and a number of coastal habitats. The SSSI is also a component part of the Dornoch Firth and Loch Fleet SPA (& Ramsar site), classified for a number of wintering birds and breeding osprey that occur in internationally important numbers.

Part of the proposed golf course is located within Coul Links, one of two sand dune systems within the SSSI (Coul Links = 137ha; Ferry Links = 69ha). Part of the golf course is located outwith the SSSI. The two sand dune systems are separated by the Loch Fleet tidal basin, with Coul Links to the south and Ferry Links to the north. Behind the high dune ridge at Coul Links there is an extensive dune slack which runs along a significant proportion of the dune ridge, which often floods during winter and is used by feeding/roosting SPA ducks.

A number of SSSI interests are not present within Coul Links and would not be impacted by the proposed golf course (see table below). The interest present within Coul Links which would be impacted most by the golf course is sand dune. Estimated figures for direct (habitat loss) and indirect (habitat modification) sand dune loss based on the latest details from the developer are provided in the table below. Indirect impacts are particularly important as the golf course layout runs throughout the dune system of Coul Links, so impacts are not restricted to part of the system, but throughout. For comparison purposes, direct sand dune loss for the Menie golf course was 25.1ha (12% of the sand dune SSSI area); there are no comparable figures for indirect impacts.

Loch Fleet SSSI table of interests (SSSI area: 1231.77ha)

SSSI interest	Extent of interest (ha)	Condition of interest	Present on Coul Links	Area impacted by golf course proposal (estimated figures - ha)	% of SSSI interest impacted
Eelgrass beds	156	Unfavourable	No	Nil	N/A
Sandflats	577	Favourable	No	Nil	N/A
Saltmarsh	22	Favourable	Yes	Outwith golf	N/A

				course layout	
Sand dunes	206	Unfavourable	Yes	Direct (15-20); Indirect + Direct (20-25)	Direct (7-10); Indirect + Direct (10-12)
Native pinewood	139	Unfavourable - recovering	No	Nil	N/A
Vascular plant assemblage	N/A	Favourable	No	Nil	N/A
Breeding bird assemblage	N/A	Favourable	Yes	Impacts can be mitigated	N/A
Eider (non- breeding)	N/A	Favourable	Yes	Impacts can be mitigated	N/A

The proposal involves a significant amount of excavation and re-profiling, including 56k cubic metres of sand and up to 2m (raising & lowering) in some cases. This is likely to alter the hydrology of parts of the dune system, and will likely result in changes to some plant communities.

To date discussions with the developer have focussed on dune heath, which is a component habitat of the sand dune and is particularly rare in Scotland. This is where most extensive habitat change through turving would take place (i.e. change from heather to grass).

We understand the developer plans to submit a planning application for this golf course in September. SNH will provide advice on that application to the Highland Council as the decision-making planning authority.

Scottish Natural Heritage, 15 August 2017.

From: [Ian Bray](#) on behalf of [Nick Halfhide](#)
To: [Rhoda Davidson](#)
Subject: FW: Coul Links
Date: 05 January 2018 09:33:38
Attachments: Biodiversity - news release - national - SNH provides advice on Coul Links golf course - November 2017.docx

From: Nick Halfhide
Sent: 24 November 2017 11:03
To: Steven.Dora@gov.scot
Cc: Keith.Connal@gov.scot; Fergus Macneill
Subject: Coul Links

Steven

As discussed, here is a draft of our press release. Any views welcome – we would like to get it out this afternoon.

We have not yet shared with Greener Coms. We would usually do that once we have discussed the policy content with yourselves but happy if you want to discuss with them yourself. Let me know what would suit you best.

I'm on my mobile if you'd like to discuss.

Nick

Nick Halfhide
Director of Operations
Scottish Natural Heritage
01463 725224 or [REDACTED]

SNH provides advice on Coul Links golf course

Scottish Natural Heritage (SNH) has published its advice on a proposed new golf course at Coul Links near Embo in Sutherland.

The organisation considered all aspects of the course's impact on the nature of the site.

Commenting on SNH's advice, Nick Halfhide, Director of Operations said: "We have worked closely with the developer on this proposed new golf course.

"We recognise the many benefits it would bring to Embo and the local economy, and we welcome the developers' commitment to high standards of construction and management.

"However, we are not able to fully support the development as proposed due to the loss of more than 16 hectares of nationally important sand dunes, and the special plants and animals found there."

The development includes a range of measures to improve the management of the site for nature but SNH considers these do not outweigh the permanent loss to the sand dunes.

Coul's sand dunes contain some of the best dune habitat in Scotland and is one of the few sites in Scotland to support populations of green felt lichen and the rare Fonseca's seed fly.

NOTES TO EDITORS

The majority of the dune system at Coul Links is a component part of two protected areas: Loch Fleet Site of Special Scientific Interest (SSSI) and Dornoch Firth and Loch Fleet Special Protection Area (SPA).

The SPA is a European designation which protects birds under the European Birds Directive.

Fonseca's fly is present within Loch Fleet SSSI. Further information can be found at: <http://www.snh.gov.uk/publications-data-and-research/publications/search-the-catalogue/publication-detail/?id=2049>

From: [Ian Bray](#) on behalf of [Nick Halfhide](#)
To: [Rhoda Davidson](#)
Subject: Coul Links response
Date: 05 January 2018 09:31:40
Attachments: Coul Links planning application - SNH response to Highland Council - 24pdf

From: Nick Halfhide
Sent: 27 November 2017 10:59
To: 'Steven.Dora@gov.scot'
Subject: RE: Coul Links response

Steven – response attached. Nick

Nick Halfhide
Director of Operations
Scottish Natural Heritage

01463 725224

From: Steven.Dora@gov.scot [<mailto:Steven.Dora@gov.scot>]
Sent: 27 November 2017 09:28
To: Nick Halfhide
Subject: Coul Links response

Morning Nick

Would it be possible to have a copy of the Coul response? Highland Council hasn't uploaded it yet and I need to update some briefing.

Regards,

Steven

[Steven Dora](#)

[Natural Resources Division | Directorate for Environment and Forestry](#)

[The Scottish Government | 3G South, Victoria Quay | Edinburgh EH6 6QQ | T: 0131 244](#) 
[BlackBerry](#) 



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Tha am post-d seo (agus faidhle neo ceanglan còmhla ris) dhan neach neo luchd-ainmichte a-mhàin. Chan eil e ceadaichte a chleachdadh ann an dòigh sam bith, a' toirt a-steach còraichean, foillseachadh neo sgaoileadh, gun chead. Ma 's e is gun d'fhuair sibh seo gun fhiosd', bu choir cur às dhan phost-d agus lethbhreac sam bith air an t-siostam agaibh agus fios a leigeil chun neach a sgaoil am post-d gun dàil.

Dh'fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh'fhaodadh nach eil beachdan anns a' phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.



Scottish Natural Heritage Dualchas Nàdair na h-Alba

All of nature for all of Scotland
Nàdar air fad airson Alba air fad

Ms Gillian Webster
Planning Department
Highland Council
Drummuie
Golspie
By email – epc@highland.gov.uk.

24 November 2017

Your Ref: 17/04601/FUL
Our Ref: CDM 147883

Dear Ms Webster,

**Town & Country Planning (Environmental Impact Assessment) (Scotland) Regulations
Construction of 18 hole golf course, erection of clubhouse, renovation of existing
buildings for course maintenance, pro-shop, caddy hut, workshop, administration
building, information booth, formation of new private access from C1026.**

Thank you for your letter of 11 October 2017 requesting our comments on this proposal.

1. Summary

We recognise the potentially large economic benefits that could arise from this proposal and their local and regional significance. We also recognise and acknowledge the commitment and creative thinking by the applicant to develop measures to mitigate and offset impacts on nationally important natural heritage interests. However, the conclusion of our assessment is that this proposal is contrary to the Scottish Planning Policy's (SPP) requirements not to compromise the objectives of the SSSI designation and the overall integrity of the Loch Fleet Site of Special Scientific Interest.

While we are unable to fully support the proposal as presented, we believe that a golf course could be progressed in this general location by using a much higher proportion of the adjacent agricultural land.

Loch Fleet Site of Special Scientific Interest (SSSI)

We object to this proposal as it will result in significant adverse effects on sand dune habitat of national importance.

Special Protection Areas (SPAs)

This proposal could affect internationally important bird interests and we therefore object to this proposal until further information is provided. This will enable us to carry out an appraisal of these effects and help you determine this proposal. We consider it likely that these issues could be overcome by a competent Recreation & Access Management Plan and a Breeding Bird Protection Plan (for SSSI birds).

Scottish Natural Heritage, The Links, Golspie Business Park, Golspie, KW10 6UB
Tel: 0300 0676841 Fax: 01408 634222 www.snh.gov.uk

An Ceangal, Roan Gniomhachais Ghoillspidh, Goillspidh, Cataibh, KW10 6UB
Fòn 0300 067 6841 Fax 01408 634222 www.snh.gov.uk

2. Background

We have been working with the developers during the extensive pre-application stage to help gauge the likely impacts of this proposal on protected area interests. We advised the developers during those discussions that we would be likely to object to this proposal due to the adverse impact it would have to SSSI sand dune habitat.

The EIA lacks a suitable level of detail and accuracy for a proposal in such an environmentally sensitive location. We have provided some additional material to supplement the EIA in Annex A.

We have been able to assess the likely impacts of this development using the EIA, supplemented by our own experts, site visits and discussions with the applicants.

3. Appraisal of impacts and advice

3.1 Loch Fleet SSSI and Dornoch Firth & Loch Fleet Ramsar Site

This proposal lies within this SSSI protected for its range of coastal habitats and species.

Sand dune (SSSI & Ramsar)

The management objective for sand dune within the Site Management Statement for this SSSI is 'to restore the condition of the sand dune habitat'.

As presented, this proposal will result in significant permanent loss of sand dune habitat, especially dune heath and dune slacks and impacts to other special species which depend upon it. The new golf turf will not include plant species that are identifiable as a sand dune habitat. Therefore, the proposal will result in a marked change of habitat type. Direct loss extends to around 9% (16.4 ha) of the SSSI sand dune habitat, most of which is located midway along the dune system. Even after mitigation, the residual losses are extensive (at around 8% (14.9 ha)) and likely to be permanent, with indirect losses of unknown extent adding to the area lost under the course footprint.

In addition it will create a high level of disruption to natural dune processes, such as dynamism, due to large dune areas becoming stabilised. It will also result in significant levels of habitat fragmentation, with the course infrastructure spread throughout the dune system. In our view translocation of habitat is unlikely to be successful and therefore is not an appropriate management technique to safeguard a protected area of such natural environmental complexity and notable dune quality. Our view is based on 'A Habitat Translocation Policy for Britain (2003)'¹.

The proposal will be positive for the control of invasive species and negative for habitat loss and fragmentation. Balancing these gains and losses indicates that the adverse impacts will still greatly outweigh any benefits for the sand dune habitat. We have provided more detail on the impacts to the sand dune habitat in Annex A. We have also completed a scientific appraisal of how this proposal would affect the integrity of this habitat, which we would be happy to provide if it would help with your determination.

If the planning authority intends to grant planning permission against this advice, you must notify Scottish Ministers.

¹ *A Habitats Translocation Policy for Britain (2003)*. Joint Nature Conservation Committee in conjunction with The Countryside Council for Wales, English Nature and Scottish Natural Heritage. JNCC, Peterborough. <http://jncc.defra.gov.uk/page-2921>.

Breeding birds (SSSI)

The management objective for breeding birds within the Site Management Statement for this SSSI is 'to maintain the population of breeding birds and to avoid significant disturbance to these birds during the breeding season.'

There are bird interests of national importance on the site, which could be affected by the proposal (e.g. breeding terns) through disturbance as a result of increased use of the area. We require a Recreation and Access Management Plan to help determine whether the proposal will affect the integrity of the SSSI. We can provide further advice on the format of this plan in due course. We will comment further once the additional information is available.

A Recreation and Access Management Plan was submitted as part of the EIA but it does not include the necessary level of detail to reduce likely impacts.

The proposal could also adversely affect this nationally important feature through disturbance to breeding birds during the construction phase and we therefore object to it unless it is made subject to the measures as set out below:

- A Breeding Bird Protection Plan should be produced and implemented to ensure breeding birds are protected during two summer (breeding) seasons of construction.

If the planning authority intends to grant planning permission against this advice without the suggested mitigation, you must notify Scottish Ministers.

3.2 Dornoch Firth & Loch Fleet SPA & Ramsar Site

The proposal lies within the Dornoch Firth & Loch Fleet SPA and Ramsar site. This SPA is protected for its range of non-breeding waterfowl and breeding osprey and the Ramsar site is protected for its range of coastal features. The proposal also lies adjacent to the Moray Firth proposed SPA (pSPA), protected for its marine waterfowl and seabirds.

The site's status means that the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended (the "Habitats Regulations") or, for reserved matters the Conservation of Habitats and Species Regulations 2010 as amended apply. Consequently, Highland Council is required to consider the effect of the proposal on the SPA and the pSPA before it can be consented (commonly known as Habitats Regulations Appraisal). For a summary of the Legislative Requirements for European Sites, please refer to our website: <https://www.snh.scot/professional-advice/planning-and-development/environmental-assessment/habitats-regulations-appraisal/habitats-regulations-appraisal-hra-appropriate>.

In our view, from the information available, it appears that the proposal is not connected with or necessary for the conservation management of the site. Hence further consideration is required.

Waders and Waterfowl Assemblage

In our view, this proposal is likely to have a significant effect on SPA waders and the waterfowl assemblage. Consequently, Highland Council, as competent authority, is required to carry out an appropriate assessment in view of the site's conservation objectives for its qualifying interests. To help you do this, we propose to carry out an appraisal to inform your appropriate assessment.

To enable us to carry out this appraisal, the following information is required:

- A Recreation & Access Management Plan should be produced which aims to reduce any increased level of disturbance to SPA birds in agreement with Highland Council

& SNH. We would be happy to advise on the format of this plan. A single plan covering all bird issues (SSSI & SPA) would be sufficient.

Once this information has been provided, we will be able to give further consideration to this proposal.

Teal and Wigeon

In our view, this proposal is likely to have a significant effect on teal and wigeon using flooded areas of dune slack through disturbance as a result of increased numbers of people using the site. Consequently, Highland Council, as competent authority, is required to carry out an appropriate assessment in view of the site's conservation objectives for its qualifying interests. To help you do this we advise that in our view, on the basis of appraisal carried out to date, if the proposal is undertaken strictly in accordance with the following mitigation, then the proposal will not adversely affect the integrity of the site:

- From December to March (inclusive), green-keeping operations on holes 10-18 must only take place between one hour after sunrise and one hour before sunset. This should reduce disturbance to a level that is more reflective of current use.

If the planning authority intends to grant planning permission against this advice without the suggested mitigation, you must notify Scottish Ministers.

3.3 Moray Firth pSPA

In our view, this proposal is likely to have a significant effect on pSPA eider. Consequently, Highland Council, as competent authority, is required to carry out an appropriate assessment in view of the site's conservation objectives for its qualifying interests. To help you do this, we propose to carry out an appraisal to inform your appropriate assessment.

To enable us to carry out this appraisal, the following information is required:

- A Recreation & Access Management Plan should be produced which aims to reduce any increased level of disturbance to eider in agreement with Highland Council & SNH. A single plan covering all bird issues (SSSI & SPA) would be sufficient.

Once this information has been provided, we will be able to give further consideration to this proposal.

3.4 European Protected Species

Bats

We advise that you ask the applicant to provide the following additional information with regard to this proposal:

- Roost survey work for June and July, including at least one activity survey per building². This information will be needed to inform the level of mitigation required depending on the status of the bat roosts identified.

Once you have received this additional information, we can advise further if necessary.

If you approve this application without this further information you could risk the applicant being unable to make practical use of the planning permission, or the applicant committing an offence under protected species legislation. For more information, see:

² In accordance with the latest copy of BCT's *Bat Survey Guidelines for Professionals*, <http://www.bats.org.uk/pages/batsurveyguide.html>.

<https://www.snh.scot/professional-advice/safeguarding-protected-areas-and-species/licensing/species-licensing-z-guide/bats-and-licensing/bats-licences-development>.

Otters

Should consent be granted, we recommend that pre-construction surveys for otters should be carried out within the six month period preceding commencement of construction, and that a watching brief is then implemented by the Ecological Clerk of Works (ECoW) during construction. An otter Protection Plan may be needed prior to construction commencing and licences may be required.

We further recommend that the ECoW has a role in drafting the Species Protection Plan, using the information from the EIA Report and pre-construction surveys, and that the ECoW oversees implementation of the plan and any licensing requirements.

3.5 Other protected species

Pine marten & badger

We advise that the same recommendation for otter (as above) should also apply to pine marten and badger.

4. Concluding comments

We are keen to work with the applicant to try and reduce impacts, should this proposal receive planning permission.

Please let us know if you need any further information or advice on this proposal by contacting David Patterson David.patterson@snh.gov.uk.

Yours sincerely,

Nick Halfhide

Director of Operations

Annex A – Detailed advice on SSSI sand dune habitat

We expand here on the impacts to sand dune habitat and the species it supports, together with some comments on the ES. We have also included 3 recommendations that we would wish to see implemented if the proposal was granted planning permission.

Magnitude of direct impacts to sand dune habitats

The EIA does not appear to present the data on direct impacts of the course in context of the SSSI boundary. Therefore, we made our own assessment of this by using a digital layout of the course overlaying the developer's NVC habitat survey. Our results using this approach indicate much higher impacts to sand dune habitats than those presented within the EIA and are shown in the table below.

Table showing habitat impacts presented within the EIA compared to assessments undertaken by us using the developers' data

Habitat	Area affected in EIA Report (ha.)	Area affected from our assessment (ha.)
Dune heath	4.47	8.5
Dune grassland (fixed dune)	2.51	4.8
Open dune (semi-fixed dune)	0.74	0.91
Dune slack	0.27	2.20

Effects on dune slack³ & hydrology

Coul Links supports some of the best quality SSSI dune slack habitats in Scotland. The water table and water chemistry of Coul Links are very important as they influence the sand dune vegetation communities which they support, especially the dune slacks.

Fertiliser, herbicide or pesticide could be washed towards or even into a dune slack, potentially damaging these dune habitats. We note within the EIA that leaching of fertiliser may reach 100% in sandy habitats, suggesting that nitrogen is likely to reach the water table, which could cause vegetation changes to dune slack habitats.

Advice we received from the Sports Turf Research Institute (STRI) suggests that it is standard practice to irrigate at a level lower than losses to evapotranspiration. If the management does involve irrigation at a level below the loss to evapotranspiration, it is highly likely that the water table will fall below its natural level, with adverse impacts on the dune slacks.

Effects on dune grasslands

The dune grassland on Coul Links is especially diverse and rich, reflecting the national importance of this sand dune habitat. The proposal will result in adverse impacts to dune grassland through habitat loss. The use of chemicals is also likely to have impacts, potentially changing these dune grassland communities through time.

Effects on notable species supported by SSSI sand dune habitat - Fonseca's seed fly (*Botanophila fonscai*)

This rare fly is restricted globally to sand dune habitats, in proximity to Dornoch and Embo, and features on the Scottish Biodiversity List as requiring conservation action. The EIA shows that Coul Links supports a population of the fly.

³ This habitat may also support Ramsar wetland invertebrates.

As so little is known about this fly, we cannot estimate the level of disturbance that would be considered tolerable. The disturbance resulting from the creation of fairways and greens and the subsequent long-term stabilisation of the dunes will very likely damage parts of the species' habitat, with additional impacts arising from use of herbicides and insecticides.

We welcome the developer's intention to promote further research on this fly. The only mitigation proposed which is likely to benefit to Fonseca's seed fly is the retention of large areas supporting *Compositae* flowers (e.g. sow-thistle and black knapweed, etc.). Therefore, we recommend this is taken forward as mitigation should the proposal receive planning permission:

- Ensure large and important areas of *Compositae* flowers are retained throughout Coul Links for Fonseca's seed fly.

Previous surveys found the species in significantly greater numbers than the latest survey. This factor is likely to reduce the resilience of the population to such a proposal. Like most endemic species, this fly is intrinsically at risk of extinction.

Effects on notable species supported by SSSI sand dune habitat - Green felt-lichen (*Peltigera malacea*)

This lichen features on the Scottish Biodiversity List as requiring conservation action. This species was recently discovered at Coul Links on a survey visit with our lower plant specialist. An extensive population of this lichen were discovered within the footprint of hole 4 and five colonies outwith, but in close proximity to the fairway. Based on only a brief survey visit, we found that Coul Links supports around 10% of the UK green felt-lichen population.

Success of translocation is uncertain and unlikely to be viable in the long-term. Green felt-lichen depends on intermediate levels of disturbance (i.e. rabbit scraping) to maintain areas that are not dominated by other large plants. However, the impact of this development is likely to be stabilising and therefore negative.

As fairways will be fertilised, and greens and tees will be treated long-term, there is a risk of additional impact if the fertiliser were to leach into the surrounding vegetation. Use of fungicides also has potential for adverse impacts.

Effects on notable species supported by SSSI sand dune habitat – grassland fungi

A survey in 2003 found part of Coul Links to support a diverse range of waxcap grassland fungi. This area was identified as an Important Fungus Area (IFA) which qualified for national importance at that time, with more than 12 species of waxcaps recorded.

Diverse communities of fungi are strongly associated with grassland that has been relatively undisturbed and avoided applications of fertiliser. Fungicides will also have adverse effects on grassland fungi. The proposal will result in the loss of grassland fungi and potential negative impacts outwith the course footprint due to potential drift and leaching of fertiliser and fungicides. The proposal will affect approximately a third of the previously identified IFA.

Translocation of dune heath

Habitat translocation is an important element of the developer's strategy to make good losses from the footprint of the golf course. Research indicates that the long-term success of habitat translocation, as proposed for dune heath, is uncertain. Recent research shows that

the factors governing the success of translocation are poorly understood and that we should expect a high failure rate from this approach⁴.

Long-term course management, coastal geomorphology and climate change

Sand dune is a dynamic habitat so it is important to consider how long-term management of the course might affect the SSSI, especially in the context of climate change. Some tees and greens are located close to the dune edge and are therefore at risk from coastal erosion. Should coastal defences be used to protect parts of the golf course they would likely result in further adverse impacts to the sand dune through the introduction of structures affecting natural processes. Therefore, we recommend the following mitigation measures to reduce impacts should the proposal receive planning permission:



- The Coull Links coastline should remain free from future coastal defences proposed to protect golf course assets.
- A Coastal Retreat Plan should identify strategies and alternative layouts to inform future course management if parts of the course become adversely affected by coastal processes.

⁴ *Feasibility study: translocation of species for the establishment or protection of populations in northerly and/or montane environments* (2017). SNH Commission Report No. 913, <https://www.snh.scot/snh-commissioned-report-913-feasibility-study-translocation-species-establishment-or-protection>.

From: [Ian Jardine](#)
To: ["Keith.Connal@gov.scot"](mailto:Keith.Connal@gov.scot)
Subject: RE: newsdirect: Debate mention
Date: 27 January 2017 12:12:00

Hopefully very quickly since we briefed Ian R on it. I will check with Nick,

Ian

Ian Jardine, Chief Executive
Scottish Natural Heritage
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 ian.jardine@snh.gov.uk

 www.snh.gov.uk

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From: Keith.Connal@gov.scot [<mailto:Keith.Connal@gov.scot>]
Sent: 27 January 2017 12:12
To: Ian Jardine
Subject: RE: newsdirect: Debate mention

Ian, that would be very helpful. How quickly could that be provided?



Keith

From: Ian Jardine [<mailto:Ian.Jardine@snh.gov.uk>]
Sent: 27 January 2017 12:10
To: Connal K (Keith)
Subject: RE: newsdirect: Debate mention

Thanks Keith,

Maybe we need to provide you with a briefing on this one? Our Chairman has had phone calls from the developer and from Mr Ewing about this case. The developer is very pushy but there is also a very real issue here about the scale of the impact on an SAC. As things stand it looks very hard for SNH not to object – and the NGOs are all over it,

Ian

Ian Jardine, Chief Executive
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 ian.jardine@snh.gov.uk

 www.snh.gov.uk

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From: Keith.Connal@gov.scot [<mailto:Keith.Connal@gov.scot>]
Sent: 27 January 2017 12:05

To: Ian Jardine
Subject: RE: newsdirect: Debate mention

Ian

A further reply omitting the others, to alert you to an urgent request I received this morning to look at what's happening re the SNH handling of a proposed golf course development at Coul Links. I have not read any of the paperwork yet, so this is just a heads up. If you want to take a look yourself, the SNH letter is referenced CNS/DC/Coul Links Goldf Course/CPA 144063 and is from David Mackay.



Keith

From: Ian Jardine [<mailto:Ian.Jardine@snh.gov.uk>]
Sent: 27 January 2017 11:56
To: Ian Ross; 'SUE WALKER'; Connal K (Keith)
Subject: FW: newsdirect: Debate mention

Ian, Sue, Keith

Thought you might want to see this if you haven't already,

Ian

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 www.snh.gov.uk

 Please consider the environment before printing this email

From: Emma Jordan
Sent: 27 January 2017 10:17
To: George Hogg; Ross Johnston
Cc: SNHGOVERNMENT_RELATIONS
Subject: FW: newsdirect: Debate mention

Hi George,

Thought you might appreciate seeing this, sure it was influenced by your meeting and follow up!

Kate Forbes MSP (extract from planning debate):

'So what do we need? First, wisdom is required in relation to what and how we build. Building standards need to be adapted to rural areas such as the Highlands. Expert advice is also required. While I have, in the past, strongly disagreed with Scottish Natural Heritage on its verdict on the housing development in Staffin, I recognise its advisory role on Scotland's natural heritage. In fact, I have been quite impressed with the changes that SNH has made to its engagement with the planning process, to the extent that, since 2014, the number of its responses to planning applications has fallen

from more than 1,500 to more than 500; in the same period, its outright objections have halved to five. That is praise where praise is due—though I still hope that the housing development in Staffin gets the go-ahead by those tasked with the responsibility for that.'

Full report:

[http://www.parliament.scot/parliamentarybusiness/report.aspx?
r=10752&i=98649&c=1968781#ScotParlOR](http://www.parliament.scot/parliamentarybusiness/report.aspx?r=10752&i=98649&c=1968781#ScotParlOR)

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Dh'fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh'fhaodadh nach eil beachdan anns a' phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.

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From: [Liz Colmer](#)
To: DGEconomy@gov.scot
Subject: RE: Meeting to discuss Coul Links
Date: 08 March 2017 13:08:00

Hi Alan

Just to confirm that Nick Halfhide will attend on Ian Jardine's behalf.

Best regards

Liz

-----Original Appointment-----

From: Alan.Caldwell@gov.scot [<mailto:Alan.Caldwell@gov.scot>] **On Behalf Of**
DGEconomy@gov.scot

Sent: 08 March 2017 12:50

To: gillian.suttie@hient.co.uk; charlotte.wright@hient.co.uk; lorne.crerar@hient.co.uk;
'liz.colmer@snh.gov.uk'; [REDACTED]; todd@linkshousedornoch.com;
Steven.Dora@gov.scot; Keith.Connal@gov.scot; John.McNairney@gov.scot

Cc: Nick Halfhide; Ian Ross

Subject: Meeting to discuss Coul Links

When: 16 March 2017 09:00-11:00 (UTC) Dublin, Edinburgh, Lisbon, London.

Where: Walnut Room, 5th Floor, St Andrew's House, Regent Road, Edinburgh, EH1 3DG

I am now issuing the invitation for this meeting. If you are unable to attend, or if you wish a substitute to attend then please advise.

Thank you

Alan Caldwell

Private Secretary to Liz Ditchburn, DG Economy

0131 244 [REDACTED]

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From: [Liz Colmer](#)
To: [Ian Jardine](#)
Subject: FW: Meeting to discuss Coul Links- Agends
Date: 15 March 2017 14:02:00
Attachments: Coul Links agenda.docx

Dear Ian

To see the attached agenda for tomorrow's Coul Links meeting for information.

Liz

From: Christina.Kopanou@gov.scot [mailto:Christina.Kopanou@gov.scot]
Sent: 15 March 2017 13:56
To: gillian.suttie@hient.co.uk; charlotte.wright@hient.co.uk; 'liz.colmer@snh.gov.uk';
[REDACTED]; todd@linkshousedornoch.com; Steven.Dora@gov.scot;
Keith.Connal@gov.scot; Simon.Pallant@gov.scot; Nick Halfhide; Ian Ross; Moira.Strange@gov.scot
Cc: DGEconomy@gov.scot
Subject: Meeting to discuss Coul Links- Agends

Dear all,

Please find attached the agenda for the Coul Links meeting on Thursday the 16th of March

Regards,

Christina

Christina Kopanou
Assistant Private Secretary to Director General, Economy
Room 1N:01, St Andrew's House, Regent Road, Edinburgh, EH1 3DG

Telephone: 0131 244 [REDACTED]

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Dh'fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh'fhaodadh nach eil beachdan anns a' phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.

Coul Links meeting

March 16th 2017, 11.00 a.m to 1.00 p.m

St Andrew's House.

Agenda

1. Welcome and introductions, scene setting: *Liz Ditchburn*
1. Presentation from the developer of their vision and approach to the potential development and its subsequent management. *Todd Warnock*
2. Economic development perspective. View from HIE as to where such a development would sit in the local, regional and national economic development context, including what would be necessary to realise the potential economic and social benefits. *Charlotte Wright*
3. The tourism perspective. View from Visit Scotland as to where such a development would sit in the local, regional and national tourism context, including what would be necessary to realise the potential tourism benefits. *Lord Thurso*
4. The environmental perspective. View from SNH as to the importance of the natural asset, the protections in place and appropriate mitigations / approaches to stewarding the natural asset and maintaining its value. *Ian Ross / Nick Halfhide*
5. Discussion

From: [Liz Colmer](#)
To: [Nick Halfhide](#)
Subject: RE: Coul
Date: 16 May 2017 12:48:00
Attachments: Conference call to discuss Coul Links.msg

Dear Nick

I've sent the attached appointment to you - 12:45 – 13:30. Dial Conference call details:

Call: 08003767983

Code: XXXXXXXXXX

Liz

From: Nick Halfhide
Sent: 16 May 2017 07:24
To: Liz Colmer
Cc: Ivana Curuvija
Subject: Fw: Coul

Liz

Can you confirm the details of the conference call on Wed?

Nick

Sent from my BlackBerry 10 smartphone.

From: Ian Jardine <Ian.Jardine@snh.gov.uk>
Sent: Tuesday, 16 May 2017 06:26
To: Keith.Connal@gov.scot
Cc: Nick Halfhide
Subject: Re: Coul

Hi. Copying to Nick and grateful if he could let us both know if he is available. Nick also reported to me after he spoke to Todd. It is of verse not unheard of for developers to hear and speak selectively. Ian

Sent from my BlackBerry 10 smartphone.

From: Keith.Connal@gov.scot
Sent: Monday, 15 May 2017 20:16
To: Ian Jardine
Subject: Coul

Hi Ian

Liz has asked if Nick could be available to join the conference call on Wednesday.

Also, Liz took a call today from Todd Warnock. From a very brief read-out it sounds like Nick spoke to him today and advised that the Board had an interesting discussion but decided that a

net-gain approach will not be used before a review is undertaken in a year or two (not sure if a specific year was mentioned). This, if accurate, sounds more definitive than I understood was the intention and as you relayed this morning about no conclusions having been reached.

I had briefed Liz that the closed session wouldn't reach any conclusion/decision and that it would help inform our joint thinking about this issue. In that context, Liz asked me again if we had received a copy of the SNH paper.

I understand that Catriona Maclean has been speaking with Nick (and others?) about Coul and that Nick provided her with a readout from the Board discussion. Liz has made clear here that contact on the general issue and about Coul is only to be through policy, in part to avoid the risk of sending mixed messages to SNH and/or receiving different messages. Apologies if different SG contacts have caused any confusion, though hopefully that isn't the case.

Thanks

Keith

Keith Connal
Deputy Director

Natural Resources Division
Directorate for Environment & Forestry
Area 3G South, Victoria Quay, Edinburgh, EH6 6QQ
T: 0131 244 [REDACTED]
M: [REDACTED]

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thead. Ma 's e is gun d'fhuair sibh seo le gun fhiosd', bu choir cur às dhan phost-d agus lethbhreac sam bith air an t-siostam agaibh, leig fios chun neach a sgaoil am post-d gun dàil.

Dh'fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh'fhaodadh nach eil beachdan anns a' phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.

From: [Liz Colmer](mailto:Liz.Colmer@snh.gov.uk)
To: Jan.Anderton@gov.scot
Subject: RE: Coul
Date: 16 May 2017 12:54:00

Thanks Jan

It's sooo good to be back on email 😊.

Liz

From: Jan.Anderton@gov.scot [mailto:Jan.Anderton@gov.scot]
Sent: 16 May 2017 12:53
To: Liz Colmer
Cc: Keith.Connal@gov.scot
Subject: RE: Coul

Excellent – thanks, Liz!

Jan

From: Liz Colmer [mailto:Liz.Colmer@snh.gov.uk]
Sent: 16 May 2017 12:51
To: Anderton JM (Jan); DG Economy
Subject: RE: Coul

Hi Jan, Christina

Just to confirm that Ian Jardine and Nick Halfhide will join the meeting tomorrow using the conference call details.

Best regards

Liz

Liz Colmer | Co-ordinator to the CEO

Scottish Natural Heritage | Great Glen House | Leachkin Road | Inverness | IV3 8NW
t: 01463 725003 (direct line)
e: liz.colmer@snh.gov.uk

From: Jan.Anderton@gov.scot [mailto:Jan.Anderton@gov.scot]
Sent: 15 May 2017 16:46
To: DGEconomy@gov.scot
Cc: Liz Colmer
Subject: RE: Coul

Christina

Ian Jardine could join by conference call. Steven Dora will also join either in

person or by phone. I will confirm whether Keith comes to SAH or calls in. Could you please let us have details of the timing that best suits you, venue and dial-in details?

Many thanks,

Jan

From: Anderton JM (Jan)
Sent: 15 May 2017 15:41
To: DG Economy; liz.walker@forestry.gsi.gov.uk
Subject: RE: Coul

Hi Christina

Keith could do that. I assume it would be in SAH.

Liz – can you please advise re Ian’s availability?

Many thanks,

Jan

Jan Anderton | PA to Keith Connal | Natural Resources Division | Directorate for Environment and Forestry | The Scottish Government | Area 3G South | Victoria Quay | Edinburgh EH6 6QQ | T: 0131 244 [REDACTED] | M: [REDACTED]

From: Kopanou C (Christina) **On Behalf Of** DG Economy
Sent: 15 May 2017 15:37
To: Anderton JM (Jan)
Cc: DG Economy
Subject: RE: Coul

Hi Jan,

Liz’s diary is quite tight tomorrow. Liz is available on Wednesday the 17th at 12:00-14:00. Would that work?

Regards,

Christina

From: Anderton JM (Jan)
Sent: 15 May 2017 13:45
To: DG Economy
Subject: Coul

Hi

Re below, does DG have any availability from 2 pm onwards tomorrow in SAH or VQ for a meeting with Keith Connal and Ian Jardine to discuss Coul (which I gather she would like to do at the earliest opportunity)? If not could you please offer any slots later in the week?

Many thanks,

Jan

Jan Anderton | PA to Keith Connal | Natural Resources Division | Directorate for Environment and Forestry | The Scottish Government | Area 3G South | Victoria Quay | Edinburgh EH6 6QQ | T: 0131 244 [REDACTED] | M: [REDACTED]

From: Liz Colmer [<mailto:Liz.Colmer@snh.gov.uk>]
Sent: 15 May 2017 08:54
To: Anderton JM (Jan)
Cc: Ian Jardine; Connal K (Keith)
Subject: RE: Call with Keith Connal

Hi Jan,

Ian is in meetings this morning, so can be available for a call from 13:45 today.

Alternatively, he is due to be in Victoria Quay tomorrow for a meeting with Graham Black between 12:30 – 14:00 and so could meet Keith (and Liz?) afterwards.

Let me know what Keith would prefer.

Best regards

Liz

Liz Colmer | Co-ordinator to the CEO

Scottish Natural Heritage | Great Glen House | Leachkin Road | Inverness | IV3 8NW
t: 01463 725003 (direct line)
e: liz.colmer@snh.gov.uk

From: Jan.Anderton@gov.scot [<mailto:Jan.Anderton@gov.scot>]
Sent: 12 May 2017 17:45
To: Liz Colmer
Cc: Ian Jardine; Keith.Connal@gov.scot
Subject: Call with Keith Connal

Hi Liz

Keith has asked whether it would be possible to arrange a time to call Ian, ideally on Monday, if not say Tuesday, to discuss to discuss Coul Links and the Board discussion with Ian (who will know all about this) as well as trying to identify a time for an early meeting which would involve Liz Ditchburn.

Please could you copy Keith into your reply as I won't be around much on Monday morning. The Monday slots that he is free for, or could make free, are:

Before 10 am
10:30 to 11:15
12 to 1

13:45 to 2.30
4.30 pm onwards

Many thanks,

Jan

Jan Anderton | PA to Keith Connal | Natural Resources Division | Directorate for Environment and Forestry | The Scottish Government | Area 3G South | Victoria Quay | Edinburgh EH6 6QQ | T: 0131 244 [REDACTED] | M: [REDACTED]

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