

Submission number

S-35-1

Organisation

RSPB Scotland

Date

31/03/2026

Comments

RSPB Scotland would like to submit comments on the above proposed Masterplan Consent Area, which comprises a proposed phased residential development of up to 150 dwellings on land at Embo, including biodiversity enhancement, landscaping, community woodland, amenity open space, food growing area, and associated infrastructure. RSPB Scotland appreciates the need for housing, particularly affordable housing, in the Highlands. While we are not opposed to the principle of housing on the site, the potential environmental impacts of any development need to be considered carefully in the early stages, including consideration of how the location, design and scale are likely to impact nature. We note that there was a site at Embo proposed in the 'call for sites' as part of the process for the next local development plan, which was for only for 9 units. The MCA Committee Report (Table 1) states that the Embo site would comprise 30-50 housing units, and the public event information from Lochview Estate proposes 60 houses.

All these figures are less than the 150 units currently being consulted on in the public notice dated 05 January 2026. Given the uncertainty over the number of units, we have had to assume that the maximum number of 150 housing could be brought forward and have responded on this basis. The Highland Council report entitled 'Masterplan Consent Areas: Potential Sites', dated 13 November 2025 ('the MCA Committee Report') gives a 'firm preference' for the Council to progress three MCA sites, including Embo. However, we are not clear from the information we have seen whether environmental considerations have been properly taken into account in making this recommendation. The 'Map of Location of Possible Proposal for an MCA Scheme' shown in the public notice document, and the Environmental Constraints public display board PDF, indicate that the Embo MCA would be located approximately 30m from the Dornoch Firth and Loch Fleet SPA and Ramsar site and the Loch Fleet SSSI. Given the site's location close to nationally and internationally designated sites, it is very concerning that no significant constraints seem to have been identified for the MCA at Embo. We note Scottish Government MCA guidance<sup>1</sup> (p12) indicates that site surveys, analysis and constraints should be identified at stage 1, that is prior to public engagement. It is not clear to what extent this has been carried out and what the outputs of this were. We note that indicative plans show that no housing would be located directly adjacent to the designated sites which would be buffered by a 'no build community space'. However, a large housing development in this area would have

potential impacts on the nearby designated sites, for instance due to increased recreational disturbance. RSPB Scotland is concerned that the location of the MCA at Embo could have significant adverse effects on the Dornoch Firth and Loch Fleet SPA and Ramsar site and the Loch Fleet SSSI, particularly due to increased levels of recreational disturbance, both in isolation and cumulatively with other developments in the area. The proposed MCA site would also be located adjacent to the infrastructure layout for the proposed Coul Links golf course, which is currently awaiting a decision by Scottish Ministers. We note that during the inquiry for the proposed golf course proposal (NA- 270-10), impacts on the above designated sites, Dornoch Firth and Loch Fleet SPA and Ramsar site and the Loch Fleet SSSI, were discussed in detail. In particular, the Conservation Coalition, of which RSPB Scotland is a part, provided evidence on the likely impacts of recreational disturbance to the qualifying bird features. We note that any progression of sites will be subject to a more detailed appraisal of their suitability through an environmental impact assessment process (section 9.1 of the MCA Committee Report). We agree that this is crucial for all sites. In addition, the Council must undertake a Habitats Regulations Appraisal under the Conservation (Natural Habitats, &c.) Regulations 1994. From the information available at this stage, there would be likely significant effects on the Dornoch Firth and Loch Fleet SPA and Ramsar site and therefore the Council must undertake an Appropriate Assessment of the effects of the proposal on the SPA and Ramsar site and its species in light of the sites' conservation objectives. This is required before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which is likely to have a significant effect on a European site and is not directly connected with or necessary to the management of the site. A number of other MCA sites listed in the Highland Council report entitled 'Masterplan Consent Areas: Potential Sites', dated 13 November 2025, are also likely to impact on designated sites of international importance due to recreational disturbance. We note that the MCA Committee Report (Section 8.9) states that, 'An initial Strategic Environmental Assessment site appraisal for the Table 1 sites has been undertaken.

Only the westernmost sites at Tain raise the prospect of significant adverse environmental effects that will be difficult to mitigate (in terms of the potential effects of increased recreational access to Morangie Forest and its associated capercaillie interest).' We agree that this is a likely significant effect but are unclear why similar potential impacts have not been identified for Embo (and other proposed MCAs) and we are not aware of the SEA being part of the consultation documents. It is crucial that the appropriate assessments are carried out prior to any MCA being taken forward. We note that Regulation 9 of The Town and Country Planning (Masterplan Consent Areas) (Scotland) Regulations 2024 ensures that no MCA scheme can grant authorisation for development which is likely to have an adverse effect on a European site (i.e. a SAC or SPA) or Ramsar site, which is not directly connected with or necessary to the management of the site.

Submission number

S-32-1

## Organisation

N/A

## Date

30/03/2026

## Comments

Despite this being the second event, it feels to me that the initial concerns have not been addressed. Those concerns being: Facilities - GP services - major lack of capacity already  
Facilities - Schools - major lack of capacity already Road infrastructure - Why is the road not being upgraded to account for all the additional traffic?

## Submission number

S-31-1

## Organisation

N/A

## Date

25/03/2026

## Comments

I would like to register my opinion on the proposal presented by the Developer at the second public event on the 5th of March at Embo. The core part of the proposal for 60 properties, 25% 15 of which will be affordable properties, seems fair and reasonable depending on the style, type, how many properties identified for rent and affordability of the affordable properties. The second part of the proposal for 10 larger exclusive properties being built on what appears as the largest area of the development, separated from the core site by a private unadopted road without providing 25% of these properties as affordable homes is unacceptable. How many local people from Sutherland or the Highlands would be in a position to purchase these exclusive properties, I believe that this part of the proposal does not help deal with the current housing crisis in Sutherland and the Highlands. Any new housing development in Embo should be of mixed tenure inclusive and part of the existing community, in my opinion the Developers proposal especially the 10 large exclusive property section presented does the opposite. The Developer advised on the 5th of March that if it was not agreed for the 10 large exclusive properties to be developed, that the full proposal would not be viable. The Developer should be challenged on this comment and asked to qualify and quantify the detail, to me this appears like coercive pressure by the Developer to get his own way. With regards to the area of woodland

identified as a community managed woodland space, rare birds and other species have been identified in this area. Before any disturbance of this area a full species survey will need to be carried out to identify any measures that may need to be made to allow any changes to happen in this area. The impact of all aspects of construction work will need to be taken into account for this proposal for the wildlife in this area, I believe that a full EIA assessment is required, if Highland Council disagree with this view a Targeted Environmental Report must be conducted.

Submission number

S-30-1

Organisation

N/A

Date

24/03/2026

Comments

[redacted - personal information] I make the following comments on the Embo MCA: - Embo is now a dramatically ageing village - There are very few Council houses remaining and of the few private dwellings which come on the market, almost all are snapped up by incoming pensioners who price locals out of the market. - Some of these incomers bring great value to the village, but we desperately need young families to have any kind of healthy community. - Therefore it is very important that we have more housing, especially affordable housing, whether secure rent, rent to buy or low-cost purchase, to attract some of our exiles back again or bring in young families from elsewhere. I trust my comments are in order. This is my home village and I and my wife currently live in a house which was built by her relations in the early 1900s.

Submission number

S-29-1

Organisation

N/A

Date

19/03/2026

Comments

The Council will know that the Dornoch Firth and Loch Fleet SPA adjoins the Cluain Burn to the east of the MCA site, and that the Dornoch Firth and Loch Fleet Ramsar Site shares the SPA boundary there. My attention has been drawn to the potential risk of residential runoff (particularly, as I understand the plan, from MCA phases 2 and 3) flowing into the burn, meeting high tides exacerbated by sea level rise, and causing saline and potentially polluted floodwater in the seasonal wetland area to the north of the burn. The Ramsar designation, in addition to overlapping the SPA bird interests, has a plant feature (Baltic Rush) which I understand occurs in that wetland area. The Council will be aware of: 1. regulation 9 of the MCA Regulations, whereby no MCA scheme grants authorisation for development which is likely to have an adverse effect on an onshore or offshore European Site; and 2. the Ministerial and Chief Planner letter of 9 July 2025, stating that from today as a matter of policy the Scottish Government considers that listed Ramsar sites in Scotland should be treated as if they were European sites for the purposes of land use change decision making". I understand that the policy introduced by item 2 extends MCA Regulation 9 with the effect that no MCA scheme grants authorisation for development which is likely to have an adverse effect on a Ramsar site (or any of its designated interests) The relevant test appears to involve Habitats Regulations Appraisal on which NatureScot would be best placed to advise. I would also draw the Council's attention to section 51 of the Natural Environment (Scotland) Act 2026 pursuant to which the Ramsar extension of MCA Regulation 9 may within five years be a matter of legislation rather than policy. Depending on the landowner's proposed development timescales and NatureScot's advice on risks to Ramsar interests there seems to be a possibility that such legislation may make at least the later phases of the proposed MCA development undeliverable or alternatively cause a need for strict conditions. The Council may wish to consider how best to proceed in light of the new primary legislation position.

Submission number

S-28-1

Organisation

N/A

Date

12/03/2026

Comments

I am copying this email to Dornoch Community Council as they are representatives but have, as yet and as far as I am aware, not actually consulted the residents of Embo regarding this MCA. I think that they should be consulting with the village so that they can give a fair representation for the people that it will affect. Many thanks for the presentation and round table discussion on

5th March which was very informative. It is interesting to see how these preliminary consultations shape the proposed development. The Community Council should really have been present at it. I was pleased to see that the amount of houses has been amended to 60 - including 15 affordable houses, which is a figure which may, apparently, increase. I do understand that the 10 large villa houses need to be a part of the scheme to finance the lower priced houses and that without them the rest of the development will not happen. I do have concerns that some of these may become second homes and be left empty part of the year, thereby creating a ghost town. I take on board the fact that the developer cannot be held responsible for doctors, dentists etc but as the population in the area expands someone has got to do something about these issues. I remain concerned about the water pressure - although I am pleased that Scottish water are, once again, investigating. My main concern is the area of woodland earmarked for woodland walks etc. There needs to be a survey done - I know the otter uses that area and apparently there are pine martens too. There is a possibility that bats and owls also use the woods as they are. Someone in the village set up a camera and has evidence of the animals using the area, I am led to believe. It was suggested that these woods are LEPO woods and this needs to be investigated as there are severe restrictions. The developer appeared to be open to changing the plan and move the paths etc to another area of the plot. Re the 'community area' perhaps some benches and some outside gym equipment could be considered?

Submission number

S-25-1

Organisation

N/A

Date

09/03/2026

Comments

My husband and I own [redacted - personal information] and run it as a large self-catering property. We therefore employ a number of people from Embo and Dornoch and understand how hard it is for local people to find decent, affordable housing. Our manager has literally spent years trying to find an affordable place to buy. We see the new housing proposal for Embo as a very positive development, particularly for young people, with its contingent of affordable housing, which will hopefully allow the area to retain more families and people of working age. Though we fall into the older bracket ourselves, our local population is currently very unbalanced, with far too many older folk and too few youngsters and families. Additionally, it seems at the moment that Embo village may be just too small to be self-sustaining. It was a

great shame that the community shop and community centre have had to close due to lack of custom. An extra 30-50 families may make a critical difference in terms of sustaining such community functions. Finally, if as we hope, the proposed Coul Links golf course becomes a reality, this development will become completely essential to house the many more young workers we will need in this area.

Submission number

S-24-1

Organisation

N/A

Date

09/03/2026

Comments

The proposal from the developer makes very little mention of affordable properties, in fact the developer mentions detached, semi-detached, terraced and small starter homes. This is unacceptable Embo Sutherland needs family homes for local people not starter homes. The proposal put on the table by the developer should be rejected. The proposal by the developer does nothing to help with the housing crisis in the area. Phase 2 and especially phase 3 are larger in area but have less properties. In fact phase 3 the largest area has only 9 properties within it, this is just wrong. It looks like a MCA process is being used to develop an exclusive area especially in phase 3 not of mixed tenure - its no more than separation. Highland Council should reject the developer's proposal as it is not helping local people or addressing the national housing crisis

Submission number

S-23-1

Organisation

N/A

Date

06/03/2026

Comments

Further to my earlier email of Thu, Mar 5, 2026 at 10:55 AM, I would like to add a further comment as below; As a local resident living less than 5 miles from Embo, I have the following comments on the proposed MCA Scheme for the residential development of up to 150 dwellings adjacent to the village: Firstly, I think it is totally inappropriate for the prospective developer to explicitly link the development of the houses at Embo to the approval of the adjacent Coul Links golf planning application currently being considered by the Scottish Government as stated in the Press and Journal in November 2025. As the same landowner is involved in the golf course application this seems to me to be deliberately coercive and an abuse of the planning system. I am also concerned that, despite the developer suggesting the initial phase of development will be a scheme of around 50 houses, the approval of the MCA would in fact allow for the future development of a much larger scheme of up to 150 houses without the need for a further planning application. This would swamp the village and put a huge strain on local utilities such as the water supply, and also medical and dental services. This would be completely unacceptable. It is therefore essential that the size of any development be mandated and restricted through specific defined planning conditions. In addition to the above, the proposed housing scheme is adjacent to the Dornoch Firth and Loch Fleet Ramsar site and as such a development of more than a small number of houses would lead to a significant negative impact on the designated features of the area. This would include hydrological impacts and direct serious damage and disturbance to nationally scarce aquatic plants and British Red Data Book invertebrates as well as important populations of Greylag geese, Wigeon and Bar-tailed godwit.

Submission number

S-22-1

Organisation

N/A

Date

06/03/2026

Comments

Please see below my comments on the proposed Embo MCA. While I support the building of good quality and genuinely affordable homes for local people, I have strong reservations about this application and the motivation behind it. Highland Council states in its online MCA information that 'The principal reason to progress MCAs within Highland is to address presently unmet housing need and demand'. Part of the reason that there is unmet housing need and demand in the Dornoch and Embo area is that 25% of existing houses (200 houses in total) are currently being used as second homes and holiday lets and are not available for local people to live in. This is true of Embo as well as Dornoch. In recent housing developments in Dornoch

(Springfield's Dornoch North Phase I-III and Pat Munro's Dornoch South) an equivalent percentage of new houses have been bought as holiday lets and second homes. This suggests that an increase in the supply of houses may not necessarily solve the problem of unmet housing need and demand. As stated in the attached report, empty homes destroy communities. Holiday lets and second homes inflate the cost of housing to unaffordable levels, local people are priced out of the market and working families move away, leading to local staffing issues. For at least the last 25 years, housing in Dornoch and Embo has been typically 10% more expensive than in other nearby settlements, such as Golspie, Tain or Bonar Bridge. As affordable houses are priced at 10% below market value, this will only reduce the price to existing levels elsewhere. In addition, the landowner and prospective developer for the proposed Embo MCA is the same person who holds planning permission for a hotel to the north of the site and is involved in a contested application for an adjacent golf course, currently under consideration by Scottish government ministers. He has stated repeatedly that the MCA development and the hotel development will not go ahead unless the golf course application is approved. The landowner says that the golf course will be developed by American golf resort developer, Mike Keiser. A key component of Mike Keiser's other golf developments across the world is the selling of 'real estate' to American golfers, usually in the form of spacious four-bedroomed units connected to the golf resort by private roads and buggy routes. While Phase 1 (suggested by the landowner to be 50 houses) may include affordable terraced homes for local people, there is nothing to prevent further phases of up to 100 second homes and holiday lets for American golfers. This would be a mockery of the stated intention of the MCA process 'to address presently unmet housing need and demand'. In addition, the MCA development area is immediately adjacent on its north east corner to an internationally important Ramsar site. It appears that the proposed MCA could drain onto the Ramsar site, potentially causing adverse effects to the hydrology and wildlife of the area. In conclusion, I feel that it is of the utmost importance to the MCA process that any approval if granted is subject to strict conditions and exclusions which ensure the following: 1. That approval permanently excludes the sale of new houses as holiday lets or second homes. 2. That affordable homes are priced at a level which is genuinely affordable on local salaries (this would need to be worked out). 3. That any further development on the site beyond the proposed phase 1 is subject to a repeated MCA process and is not simply taken as already approved in principle. 4. That a specific number of affordable and other units is agreed and set before approval (ie not just a range of 1-150) 5. That an Environmental Impact Assessment and an Appropriate Assessment is conducted before approval to ensure that the adjacent Ramsar site does not suffer adverse effects from the building and ongoing habitation of the new housing and infrastructure. 6. That specific conditions are set on the inclusion and future maintenance of the woodland walks, tree planting, landscaping, amenity areas, food production areas etc as promised by the landowner. Many thanks for your attention.

[attachment provided, related to golf course proposal]

I am concerned that the proposed golf resort on Coul Links may already be having an unintended impact on housing options for young and old people in the communities of Dornoch, Embo and the hinterland, and that it could unwittingly lead to the weakening of community life in the area. 2 Since the last public inquiry there has been unprecedented 'luxury renovation' of older housing in Dornoch and Embo, construction of 100+ houses on the Springfield estate, as well as a significant number of large new individual houses being built on sites around the villages. Yet many of these houses are clearly not occupied all year round. 3 At the same time, friends who have bought family homes on Dornoch housing estates (Pat Munro and Springfield) tell me that as many as half the new-build houses around them have been bought as short-term holiday lets or are left unoccupied for most of the year. 4 When 'Communities for Coul' was established and began promoting the idea of a second application for a golf course, one of the eleven houses which make up [redacted - personal information], a few miles from Embo, was bought by a golf speculator. This person used that local address (despite the house being unfurnished and empty) to write in support of the Coul Links golf application, stating that if Councillors did not approve the application, he would take his capital elsewhere. When it became clear that the application would be called in by the Scottish Government, the speculator sold the house. This unsettling episode suggests that publicity around the proposed golf course has been fuelling a race for second home investors to make money from the area. 5 Concerned by this and other examples, I asked the Highland Council for information on how many houses in Dornoch parish are classified for Council Tax purposes as second homes or as unoccupied properties (1). 6 I wanted to see if the figures backed up anecdotal evidence that second homes and holiday lets were increasing in number since the first golf course application in 2016, so I asked for data from 2016, 2020 and 2024. Unfortunately, the Council doesn't retain historical information and could only give me figures for 2024 (2). 7 I was startled to discover that 100 houses - ie. 15% or one in six houses paying Council Tax in the parish - are already unavailable for occupation by local people. For comparison, in 2022 the Scottish national average for second homes and unoccupied houses was 4.3%. 8 The greatest proportion of these unavailable homes (21%) are in band A, the lowest Council Tax category and the traditional entry level for young people buying their first home, or for older people downsizing and living alone. Nearly half the unavailable properties (49%) are in bands A, B and C: the lowest three of the eight bands. It appears from this data that second home investors are removing the most affordable houses from the local housing market. 9 Due to the way Council Tax bands are allocated (3) some of the houses in the A, B and C categories are amongst Dornoch and Embo's oldest and most characterful cottages, homes which were recently lived in by local families. Once bought and transformed into luxurious second homes, however, these houses become unaffordable on an average local wage and quickly disappear from the local housing pool, possibly for ever. 10 An anomaly of the figures I received from the Highland Council is that they do not include second homes and holiday lets which are owned by companies or have registered to pay rates as a small business. I checked the Scottish Assessors Association database for several well-known second homes in the village and could not find the addresses listed on the Council Tax register. I searched for these properties on the Rateable Value register

and discovered there are an additional 92 houses or flats registered as self-catering units in and around Dornoch and Embo. Many of these are company owned.

Alarming, this suggests that the percentage of unavailable homes in the area is already as high as 25% or one in four. (4) 11 Second homes and holiday lets are well known to drive up house prices and increase the incidence of homelessness, especially amongst younger and older single people. They also create seasonal ghost towns. This is already happening in parts of Dornoch and Embo. Take a stroll through the village centres and you will see many houses where the blinds are drawn. Walk in winter and there will be no house lights from one end of a street to another. 12 For those living alongside holiday houses and second homes the experience is unnerving - they have no neighbours, no relationships, no community around them. 13 The problems of overtourism, second homes and holiday lets are well-documented for places like Cornwall and Cumbria. Closer to home, we are now seeing the same issues in Skye, Ullapool, Gairloch and Plockton (5). 14 Dornoch and Embo are well on the way to experiencing similar problems. In the last few years many local holiday lets have been set up to cater exclusively for the high-spend, overseas golf market. Should this new golf resort be approved, it is highly likely that second home investors, real estate speculators and holiday letting companies will be queuing up to buy even more houses in the area. 15 Empty houses contribute little or no value to the local community, and unaffordable houses push local residents to the margins or to communities further afield, encouraging depopulation. Recent reports suggests that when second homes and holiday lets reach 20% or one in five, there are not enough working people to sustain the services required for a properly functioning community (6). 16 'Communities for Coul' may suggest that their golf course application will be good for the area, but it could inadvertently hollow out the centres of Dornoch and Embo, push local people away, and turn the strong, vibrant communities we already enjoy into something considerably less resilient and sustainable.

Submission number

S-21-1

Organisation

N/A

Date

05/03/2026

Comments

I support this application. The population of sutherland used to be 25,793 in 1851, there is approx 1300-13500 now living here. This is only topped up by english white settlers moving

here. Young people of working age move away, i believe this is a great shame. Back in 1851 people were living more rurally than they do today so it would be good to see some more rural homes getting built aswell as these masterplan ones. This development and coul links golf course have a chance to change this demographic and migratory problem into an oppourtunity for sutherland to thrive again.

Submission number

S-20-1

Organisation

N/A

Date

24/02/2026

Comments

I want to start with a question - does the person/people that are proposing this development know what it is to be part of a small community? Embo isn't just a collection of houses - it's a community in the truest sense of the word. The reason it feels safe and special isn't because of streetlights or infrastructure, but because of the relationships between the people who live here. We know each other. We know each other's children. When our kids are outside playing, they aren't surrounded by strangers - they're surrounded by neighbors who look out for them. That shared familiarity is what gives parents the confidence to let their children roam, explore, and grow independently. Safety here comes from connection. We check in on one another. We lend tools. We bring meals when someone is unwell. If something looks out of place, someone notices - not out of suspicion, but out of care. There's an unspoken understanding that we're responsible not just for our own homes, but for the wellbeing of the whole village. Growth isn't necessarily the problem. But rapid expansion risks changing the very thing that makes this place valuable. Community doesn't automatically scale with housing numbers. It's built slowly, through trust, familiarity, and shared experience. If development happens in a way that overwhelms that balance, what's lost can't easily be rebuilt. I hope you'll consider not just what can be built here, but what could be lost. Profit can be measured quickly. Community cannot.

The choices made here will shape the lives of our children long after the development is finished. We ask that you weigh that responsibility carefully.

Submission number

S-19-1

Organisation

N/A

Date

24/02/2026

Comments

As a native and resident of Embo, I would like to record that I do not agree for further housing in Embo at present, due to the fact that over 30yrs ago our village plan was meant to have the underground pipe work all renewed within 5yrs and has never been done to date. Yes, Scottish Water has put in valves recently but that is not renewing all the old lead pipes throughout the village and with that the good number of bursts that they cannot find. So before any new dwellings comes into the equation perhaps get our services up to the standards for living in 2026. The village water pressure has been badly affected by the amount of users at Grannies Heilan Hame and indeed this is to get worse with another 21 caravans added this year. Embo residents have been told no not the cause but we all live here and is it coincidental that through the winter months we have good pressure and from April it has gone down by half? There is also the big problem of 100's of houses been built in Dornoch with no regard to residents for the Health Centre; schools; etc and this does affect Embo as we have no facilities in our village - it is our Health Centre and school is as well. One road into Embo and the same road out - we have one of the busiest roads in our village with Lorries/Vans/cars/caravans etc constantly but increased tenfold from April-Nov with guests to the caravan park. Until all of the above is fixed there should be no additional housing in Embo. When and if it ever happens then yes 1-20 houses is more than enough for this village.

Submission number

S-18-1

Organisation

N/A

Date

09/02/2026

Comments

PROPOSED HOUSING Whilst I wasn't against the initial plan for a golf course, I am vehemently against this housing proposal, which is doing nothing but urbanising the area, more so when you consider that a community can only sustain 3% growth per year, which leads me to believe that there is a total disregard for the people living in the Highlands and their way of life! This, in addition to the fact, that nothing has changed since the Reporter declined the last housing proposal for this area over 20 years ago. There is still major infrastructure problems in the village. The pipework hasn't been upgraded since the Second World War, and this is compounded by the extra demand from the caravan site which (for some unknown reason), the Council continues to allow to expand, further inconveniencing the local residents. We were led to believe a complete re-engineering of the infrastructure was going to take place in the mid 1990's, at which time the village was crawling with Civil Engineers telling everyone what they were planning regarding our roads, pavements, pipe works, etc, only to end up with some cosmetic roadwork, when the Civil Engineers and funding went elsewhere! (Another unfulfilled promise!) And whilst your presentation stated that Dornoch Academy still had capacity (?), the building itself is past its 'sell by date', being built in the early 1960's when structures weren't built to last, unlike anything erected in the early 1900's and before. However, it is the new housing estate at Springfield that has most definitely tipped the balance for housing in this area. It has put undue pressure on Dornoch, which has impacted on the whole Parish, and turned a lovely Highland village into a jam packed nightmare. Short term parking is pretty much impossible, meaning people like me carry onto Tain (not helping local businesses nor the environmental footprint that the Government keeps banging on about!). And we have already went from 6 monthly check-ups to yearly check-ups at the dentist, and no doubt this will jump again, because of additional housing. More worryingly though, is the extra demand on hospital and doctor appointments. Raigmore has been under pressure for many years and the only thing Councils focus on is additional housing, which only exasperates the problem, so it is of much more importance that this is addressed before any further housing is considered for the Highlands. Therefore, in conclusion, this proposal should most certainly not go ahead.

Submission number

S-17-1

Organisation

N/A

Date

05/02/2026

Comments

I am writing to express my opposition to the proposed housing development. I have several concerns that I would like to raise. Affordability: I am concerned about the affordability of the housing units. While the developers claim to make these houses affordable, I believe that building and selling them will drive up the housing market. Furthermore, the requirement to make 25% of the houses affordable by being local authority housing and mid-market rent raises questions about the potential for increasing this percentage. Would you consider this? I am also concerned about the availability of housing in Springfield. According to the Right Move website, several houses have been built in Springfield and not sold. How can the developers guarantee that the houses they are building will sell? Will locals be given priority in purchasing these houses? The purchase of many houses in Dornoch for holiday use has contributed to rising house prices. Education: The local nursery, primary and secondary schools are nearing capacity. Have you considered the potential increase in the number of children in the area? Would Highland Council be required to build a new school? Would they have the budget to do so?

Would the local bus company be able to accommodate the additional children? The local baby and toddler groups are also at capacity. There have been a significant number of births in Dornoch over the past year and this will only increase. Healthcare: Although the doctor's surgery in Dornoch is excellent, as a local I struggle to secure an appointment. There can be a two-week wait. The developers could propose expanding the surgery, but how would they do this given the national shortage of doctors? Raigmore is already facing challenges posed by its Highlands population. How will the influx of additional individuals contribute to addressing these issues?

Services: Will the local fire station be adequately equipped to manage the increased demand resulting from the community's expansion? The community has experienced a decline in its sense of security. The 'All Things Dornoch' Facebook page has reported an increase in criminal activity including vandalism at the local caravan park, harassment of pupils by a man in a van and the theft of bins. Furthermore there has been a surge in drugs in the community. [rephrased] Concern about increased drug activity in rural areas which could affect Embo. Given the current strain on the police service it is imperative that effective measures be implemented to safeguard the community. The local Scottish Water Board for Embo operates in Dornoch.

When Grannies Heilan Hame operates over the summer, Embo already faces challenges in meeting the demand for water and increasing sewage. There are only two small shops within Dornoch (the Co-op and Spar). These shops are only designed for a small community which could entice larger shops such as Tesco, Asda and Lidl to expand into Dornoch, leading to more construction. The roads already struggle with the caravans that come to Embo let alone the influx of construction lorries. This will put a strain on the local council workers on maintaining the roads. With an increase in traffic this will only increase noise pollution and emissions from cars. The increased population will undoubtedly lead to an increase in dogs. There is an issue at the moment in Dornoch with owners not disposing of their dogs' faeces. The local walks are already very busy. With an increase in foot traffic this will damage paths and encourage people to veer off the dedicated paths destroying the natural ecosystem. In addition, a Facebook post has been published regarding the substantial amount of litter collected in Embo. This not only

deteriorates the town's aesthetics but also exacerbates the issue as the population continues to grow. A similar situation has occurred in Dornoch where a page has been established for Springfield residents to coordinate litter and dog waste removal efforts. Thank you for your time and thoughtful consideration.

Submission number

S-16-1

Organisation

N/A

Date

02/02/2026

Comments

We cannot sustain our village as it is and works and repairs to be fixed. Doctors, dentists, vets, schools etc water, flooding. We cannot get the health etc addressed and so how are we supposed to sustain more housing needing.

Submission number

S-15-1

Organisation

N/A

Date

02/02/2026

Comments

Additional housing, if approved, must be supported by an increase in provision for medical facilities, educational facilities, social and recreational opportunities. Public transport is non-existent. Housing provision MUST include sufficient bungalows.

Submission number

S-14-1

Organisation

N/A

Date

02/02/2026

Comments

The road from Dornoch to Embo needs upgrading to improve safety issues around the junction of Embo Street and Hilton. The current signage is very poor and is dangerous due to speeding traffic. Please don't use this proposal to delay road improvements. In principle the scheme seems ok. Provided that the infrastructure can cope with improved sewage, water and energy supply.

Submission number

S-13-1

Organisation

N/A

Date

02/02/2026

Comments

Primarily I am all for housing but not if the local young people cannot afford to buy them. Concerned about the water pressure as currently during the summer it is an issue. The roads during summer is also extremely busy therefore the construction traffic could add to the road problems especially at Embo Street where it is single track. Over the years the village has not had much in way of improvements, by having paths to walk, parks for kids as the current one is not in good repair. I would like my kids to be able to afford a house in Embo and at the moment there is nothing to bring them here. Slightly concerned about people, mainly older 'incomers' objecting and not letting genuine young people have the opportunity to purchase a house in their own village, just like all the issues with the golf course!

Submission number

S-12-1

Organisation

N/A

Date

02/02/2026

Comments

Masterplan is agreeable providing the inclusion of a bus route into the village also a grocery shop and also an improved pressurised water supply. Also, consideration should be applied to Primary and Secondary school to be able to accommodate influx. Doctor surgery also and Raigmore Hospital.

Submission number

S-11-1

Organisation

N/A

Date

02/02/2026

Comments

Water pressure issues Concerns about sewage i.e. would they be able to cope. Road access i.e. single track road at Heatherwood/Embo Street.

Submission number

S-10-1

Organisation

N/A

Date

02/02/2026

## Comments

I am a young girl who would like the opportunity to buy a house in the village.

## Submission number

S-9-1

## Organisation

N/A

## Date

02/02/2026

## Comments

Water lines priority: Water tank not large enough for village and development plus extra caravans being built on caravan site. Social housing, Embo young people given first right of refusal. Roads: Roads from Dornoch at Heatherwood Park needs double tracked, been waiting nearly 30 years for it to be completed. What guarantee to have up to 150 houses will be built to comply with the Scottish Government rules are met to provide amenities within 20min walking distance. Also, Embo needs a proper bus service, the residents in village getting older and not able to drive. Or will it be less houses and left with no amenities.

## Submission number

S-8-1

## Organisation

N/A

## Date

02/02/2026

## Comments

I went to the consultation on Thursday evening. I did fill in a written comments form but, having talked it over with my husband, I have some additional comments. The amount of 'affordable' housing is very small and, from what I could gather, is not particularly affordable. The houses earmarked for people with a link to Embo would apparently be difficult to get a mortgage on

and if the person wanted to sell up, the house could not go on the open market. This does not sound ideal. It sounds rather as if it is being used as propaganda to stop objections and make it seem as if the developer is doing it because it's what people have apparently asked for in the past. There has been a lot of problems with the water supply, the village has been dug up and monitored most of the summer of 2025. When a msp enquired about it he was told 'it's complicated'. If it is so complicated how are they going to add more houses to the system without causing more problems? In fact the water pressure on Friday was terrible again. My last point is about using the existing sewage and drainage system. I have not had problems with sewage. However, even though the drain covers in the roads are lifted and cleaned yearly most flood when it rains. A couple of houses had to use sandbags to stop being flooded - this was from blocked drains. Some are in poor repair and are sinking into the road and some covers cannot be lifted at all. Before adding to a broken system I think that there should be a survey and appropriate measures taken to make sure the existing system is fit for purpose first. I know some villagers want a shop or cafe but I don't think there is the footfall to sustain it. I am also sceptical that a 'community meeting area' would be used.

[Paper form feedback] My concerns 1. Water pressure - the village has been dug up most of the summer, my boiler breaks down often because of the sediment and air pumped into the system each time. It is NOT resolved yet. 2. Pressure on already strained doctor surgery, dental surgery 3. Lack of vets after Rogart closed and Easter Ross vets work mainly out of Invergordon. Jo and Farrel are harder to get appointments with. 4. No transport (public) to Dornoch. So if you want to catch a bus to Tain, Inverness etc you need to drive or walk to Dornoch. 5. Still concerned that the homes will be used for airbnb/second homes 6. DADCA may have been advised by did not let Embo know. A leaflet drop would have made sure that everyone knew. It was very much word of mouth or a change viewing of a random facebook site. 7. Worried about the impact on Dornoch facilities and parking 8. There is a lot of flooding at the junction out of the village if there is a lot of rain. It comes down the hill, the drain is inadequate and it only leaves a very small part of the road unflooded.

Submission number

S-6-1

Organisation

N/A

Date

02/02/2026

Comments

These are my initial comments following the consultation on the above date. I was disappointed with the lack of clarity available at the event considering that this was an official consultation, about what type of properties labeled as AFFORDABLE HOMES would be, the detail put out prior to this event advised that this proposed development aims to include a mix of detached, semi detached and terrace housing alongside affordable homes. This sounds like the affordable homes will be of a lower quality standard of accommodation, this is not acceptable whatsoever. No one was able to answer my questions about what type of properties the affordable homes would be, how many there would be or where they would be positioned on the plans presented. It is unclear if the affordable homes would be of mixed tenure or how these homes would be integrated into the development. It is also unclear exactly how many properties are going to be built within this proposal, stage 1 looks like it could be 50 properties, there is also a phase 2 and phase 3 to this development, these phases appear to be of larger exclusive detached properties, rising to 150 properties in total. The style of the properties within stage 2 and stage 3 appear large exclusive properties, these types of properties are not what Embo or Sutherland needs. Local people of Embo and Sutherland need affordable homes, homes with affordable rents for young families, not expensive detached homes designed for private sale to people from outside Sutherland, even outside Scotland. This proposed development does not meet the region's housing needs, we need affordable homes for young local people and homes for families to rent. At first glance this proposed development does not meet the needs of local people and the people of Sutherland. This appears like Highland Council in partnership with a Developer, using the MCA planning process to build a majority of exclusive private detached homes for people outside Sutherland even Scotland., not a good use of the MCA planning system and does not help address the housing emergency in Sutherland. Highland Council has declared a housing emergency in areas like Sutherland, there is a long standing shortage of affordable housing to support the Green Freeport Project, this proposal does not provide enough of the type of housing that Embo and Sutherland needs, this proposal is no more than an exclusive private housing estate with a few affordable homes sprinkled around, which is just not enough. [rephrased] Concern that Coul Enterprises, the potential developer partner for this proposal, is not a registered company. The proposed Developer has no builder in place, no one knew where the access road to the development would be or the position of roads within the development. The road leading to Embo may need widened, possibly even a filter lane to accommodate additional vehicle use, no one could advise about these concerns. Embo as a whole is a protected area, on the proposed drawing it shows that part of the woodland area is to be removed for this development, this area is full of rare animals, otters and other protected species. No one was able to advise if an assessment has taken place to consider protection for the wild life and the environment. This proposal would be adjacent to a SSSI protected site, this proposal would need full environmental approval before any agreement should be made with the developer. Given that phase 1 is for 50 properties, this alone is classed as a major project, possibly rising to 150 properties with phase 2 and phase 3, this would mean that Embo would basically double in size. A proposal of this size should never be considered under MCA planning rules, this needs to be placed under full planning conditions and full planning scrutiny. The infrastructure within Embo cannot support an additional 50 houses, never mind an additional

150 houses. Within 20 minutes there is no local shop, there is no bus service either connecting Embo to Dornoch and beyond. There is already an ongoing issue with water pressure in Embo adding on an additional 50 to 150 homes would potentially increase the that we have been having with the water supply. In Embo we experience mini power outages with electricity, what impact are these additional proposed properties going to have on the power supply to Embo.

With regards to the Community Input part of the MCA, Embo has 152 properties at present some of the residents are elderly, some are less able physically who do not have access too or to use internet or social media, if they don't buy a local newspaper they will not know about this proposal. I asked if it was Highland Councils intention to hand deliver a survey/questionnaire to all 152 existing properties to get their views on this proposal which would not be difficult to do. I was advised that they did not have to do that and that what they were doing was all that they had to do. Digital exclusion is high among the elderly, Highland Council has a duty under the Equality Act 2010 and the Care Act 2014, to provide information in a physical format to the elderly, vulnerable and less able residents of Embo, the whole of the existing community in Embo should have a say on this proposal. At this point in time I would reject this proposal as it does not provide the type of housing that Embo and Sutherland needs, I would urge Highland Council to review and think again about this proposal.

Can someone qualify and quantify the following questions as during the first event all of these questions were not answered 1 Is the public event in Embo on the 5th of March the final event for Embo. 2 Can someone advise exactly how many affordable homes will be built in phase 1 3 What type and style of properties are the affordable homes in phase 1 going to be 4 Can someone explain exactly what they mean by affordable homes, are they for rent, to buy, part purchase, . 5 Will there be any homes available for people to rent? 6 Will the people of Embo and Dornoch be given priority for the affordable or rented homes. 7 Is phase 2 and phase 3 part of this proposal, will this definitely happen? 8 How soon will phase 2 and phase 3 of the proposal begin following the completion of phase 1. 9 How many affordable homes will be built in both phase 2 and phase 3. 10 Will there be any homes designed for people who are disabled, visually impaired, additional support needs and the elderly in phase 1. 11 With regards to the development extending into the wooded area, has an assessment taken place with regards to the wildlife,rare birds who use and nest in this area. 12 Embo as a whole is a protected area, given the importance of this development being adjacent to a SSSI site, have NatureScot been contacted about the potential impact of this proposed development 13 As we have a housing crisis in the Highlands, will there be a restriction on people from outside Sutherland and Scotland purchasing private homes as second homes, renting out as holiday homes. 14 Can someone answer how the 20 minute rule can be applied in relation to local infrastructure in Embo given that we have no shop, no bus service, very little amenities for young and old in Embo. 15 Will the infrastructure required happen if this proposal goes ahead, who will be responsible for putting the infrastructure in place. 16 The volume of traffic will increase dramatically if this proposal goes ahead, along with the holiday traffic for Parkdean during the

holiday season will there be a requirement to improve the road structure under safety guidelines.

Submission number

S-5-1

Organisation

N/A

Date

02/02/2026

Comments

Unfortunately I was unable to attend yesterdays meetings in Embo Old School. I am an Embo resident and was born and brought up here in the village. I reside with my husband at [redacted - address]. I love my village and do not want it to change beyond recognition, this proposal for 150 houses will certainly do that. Even Mr Ed Abel Smith's assurance that its only 30-50 houses raises considerable alarm bells to me. We do not have the infrastructure in place to cope with these plans, 1. The roads are inadequate. We already have the extra traffic to cope with from March - November with the campsite. Although a bypass road to Grannies is in place the traffic race down this road and don't adhere to the speed limits. Much of this traffic uses the Skelbo route down from the Trentham as google maps take them this way. The proposed route for the new road is on a bend and will undoutably cause accidents! 2. Our water pressure in our village is dramatically reduced when the campsite is at capacity. Many of us villagers were opposed to the planning for an extra 21 static vans because of our water pressure issues but Grannie's Heilan Hame were still granted permission. There are currently preparing the site for them over this winter months and we just cannot pathom why they were given the planning before the waterboard have fixed the problem. 3. Our health centre in Dornoch has insufficient Dr's to cope with the extra demand for their services. 4. The school's won't be able to accommodate the demand for children to attend them neither will the school transport. 5. You say that so many of the proposed houses are to be affordable but our young folks cannot afford houses that cost

£200,000+ My own son is renting from a private landlord and has been for years. Since [redacted - personal information] he's been in numerous houses, about 5, and currently moving yet again because he can't afford the colossal rents in Dornoch and can't afford a deposit for a mortgage. This is with both himself and his wife working. I'm also concerned that many of these homes will end up as 2nd homes for Southerners and will be vacant for months of the year. Or they quite possibly will become air bnb's. This will not help our young folks get on the housing ladder. You just have to look at Springfield and Pat Munro houses in Dornoch to see this.

Submission number

S-4-1

Organisation

N/A

Date

30/01/2026

Comments

I would like to give my opinion on the proposed houses at coul farm, embo. As a resident of Dornoch with a young family, I am against the proposal. There has been too many houses already built in and around Dornoch. It is now harder to get a Dr's appointment, the wait is much longer too. Also, [redacted - personal] in the school, there isn't the capacity for all of the new children incoming, let alone more. The nursery is also full. I think the amenities in Dornoch are already struggling to cope with the influx of people moving into new houses. It also doesn't feel as safe here anymore. In the summer, when Grannies is open, Embo struggles with water supply already. This has a knock on effect to Dornoch. There isnt a sufficient supply of water as it is. The same as the sewer, theres only so much it can take, and its already at the limit. So I am against the proposal, and sincerely hope it does not go ahead.

Submission number

S-3-1

Organisation

N/A

Date

29/01/2026

Comments

I totally oppose to the building of any houses in our village. I was actually born in the village and lived here almost all of my life, and by building additional houses will ruin the village! The [redacted - person] at the meeting stated up to 150 houses, this will increase the volume of the village by +100%. In what world is this acceptable! I know Abel Smith put a notice up saying no more than 50 homes will be build, but I know from looking at Springfield houses in Dornoch, the

number will increase ten fold! Who will be living in these houses, I guarantee it will not be young local folk! I along with probably the majority of Embo folk do not want these houses to go ahead! It's seems a landlord who wants to make a buck or two at the expense of our lovely small community. And to heck what the local people feel and want! If he wants to build a NEW village, he has plenty of land, let him build it elsewhere eg on the north side of Coul Farm! Away from our village Embo. 1. Do not have the infrastructure 2. Water pressure not adequate especially from April to October. 3. Not enough room on the school bus 4. Where they are proposing the entrance to the new scheme, would be a huge hazard, in fact ludicrous!

Numerous accident waiting to happen. I have [redacted - personal information] who all live in the village, and speaking to them without putting my views across, said they do not want these houses and would not feel safe going out at night! Please consider this application very very carefully and not about the revenue this will generate for the highland council! It will simply kill our community.

Submission number

S-2-1

Organisation

N/A

Date

15/01/2026

Comments

When considering the development please can the following items be part of the plan  
Archaeology- there is a Viking grave nearby and further materials may well be in this area.  
Biodiversity- the recent golf proposals raised a lot of concerns for the biodiversity of the area.  
Water supply- with the current issues of water pressure in the village and proposals to increase the campsite capacity could place incredible strain on these supplies. Transport- the single track road will be under increased pressure particularly when the campsite is open and should look at safety measures- traffic lights/ priority to certain traffic or dualling this road is essential. Also public transport will need to be considered. Education- is there a need for local primary with this increase in homes. Services- provision of a shop of some sort. Eco measures- the homes must be provided with solar and battery or ground source heat pumps to ensure they are affordable homes. Can priority of these homes be given to those with a connection to the area.

Submission number

S-1-1

Organisation

N/A

Date

15/01/2026

Comments

In principle I have no fundamental objections to building affordable homes in Embo, however, I do have genuine concerns which I believe will be shared by many. Embo is a small village swelled in summer by the traffic at Grannies. They are also planning additional temporary dwellings. The water supply does not cope with the existing numbers, let alone a proposed doubling of the number of users! There are 300 residents in and about swelled by tourism in the season, so this is a substantial increase which threatens existing infrastructure. If all those homes use cars, the roads will be very busy - wear and tear, pollution, accidents. There is no public transport in Embo and most car journeys are short, so a public transport option should also be considered along with the provision of a local store. The Spa at Grannies is currently only open seasonally. These two actions would lessen the impact of more than doubling the population! Homes should be for locals. There are already air b&b, holiday and second homes in the village. I believe if these didn't exist there would actually be enough housing here. Providing local homes for local people needs to be a priority otherwise you'll get people out of area snapping up bargains for holiday homes and the council's stated objective will be null and void. Measures need to be in place to ensure this. The free market principle will NOT deliver your stated plan and will simply mean more empty properties for part of the year and less money going into the economy and Highland Council coffers. Serious thought needs to be given to ingress and egress as the road in and out of the village is busy. People walk on it. There are deer frequently crossing the it. An exit point outwith the village would be preferable to avoid hold ups at key times. Cars coming from grannies already create a stream during peak periods and tacking another 150 plus cars onto this flow would make it difficult for people to get out of the adjoining roads. I think the numbers are too high for a small rural village to cope with and there is certainly not the infrastructure in place to deal with the proposed numbers, however staggered . 150 homes represent 300 plus people, which is in excess of the current population. A smaller number would be far more reasonable.

Submission number

N/A

Organisation

Dornoch Community Council

Date

N/A

Comments

The Dornoch Area Community Council has discussed the possible Masterplan Consent Area at Embo.

Our view is that DACC would not wish to stand in the way of development if this is something the Embo community wants and supports. Equally, if feedback from local residents shows that there are significant concerns or a lack of support within Embo, then that is something we would take seriously and stand with the community on.

At this stage, members are broadly supportive of the principle of housing development that would bring real benefit to the area, particularly where it helps meet local housing need.

However, views were not unanimous. Concerns were raised about whether the current emerging concept, as presented locally, places sufficient emphasis on mixed-tenure housing that is fully integrated with the existing community. In particular, concern was expressed about the element described as larger exclusive private homes, and whether that aspect of the proposal would do enough to address local housing need.

Concern was also raised about the wider local context, including existing pressure from second homes, holiday lets, and the potential loss of housing availability for permanent residents. On that basis, DACC would wish any future scheme to prioritise genuinely affordable housing, strong local connection where possible, and a layout and tenure mix that supports the long-term sustainability of the community.

So, while DACC is supportive in principle of a development that delivers meaningful housing benefits for the area, it would ask that the concerns above are taken into account as the process moves forward. Any proposal should ultimately be guided by what the Embo community itself wants and by what will provide genuine long-term benefit to local people.