

Project Appraisal

Comporta Developments
Portugal

Preparation Stage
Milestone Document

Produced by:



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FOREWORD

Done properly golf developments provide multiple positive benefits to local environments and wider communities. Those benefits are complex and often interconnected but provide the opportunity to enhance quality of life and enrich landscapes and ecosystems. All over the world, ethical and environmental issues are directly influencing consumer choices. Resources costs are rising and governments are gaining votes with policies that protect our environment. Golf development businesses that proactively engage with these issues are better placed for success and to embrace the challenge.

Sustainability was part of golf in the beginning, and it must be part of golf in the future, creating golf courses that respect their surroundings and honor the natural environment.

1. RECOMMENDATION

The Recommendation of GEO Foundation (GEO) further to the Project Appraisal process outlined by this report is that the two golf courses¹ that, for the purposes of this report, form Comporta Development should be formally enrolled in the OnCourse® Developments Programme.

The primary reasons for this recommendation are:

- A legacy of sustainable development principles across the work that has been ongoing at the properties for over 10 years – sites known to GEO since July 2010.
- Strong commitment to environmental enhancement and off-site compensation due to the NATURA 2000 status of both sites and surrounds.
- The existing terrain, soils and climate of both sites are all well suited to deliver a low input and authentic golf courses that can be easily immersed in the native landscape surrounds.
- Opportunity to deliver a world leading sustainable construction process and example of true minimalism in its resource use and environmental footprint.
- The character of both sites offers the potential for significant habitat creation, ample space to accommodate golf and other uses on the wider property such as walking trails, bird watching and other environmental awareness and educational activities.
- A clear commitment to voluntary actions beyond statutory requirements to create a flagship sustainable development is expressed.

Taking into account the above summary of clear positive attributes of the proposals GEO is confident that given the high standard of sustainable development that commitment to the OnCourse® Developments Programme demands, the two courses that form the Comporta Developments have the potential to deliver significant multiplier benefits to the local environment and economy.

GEO Foundation
April 2021

¹ Course One –Herdade da Comporta ; Course Two: Comporta Torre

2. INTRODUCTION

PURPOSE OF REPORT

The purpose of this Project Appraisal Report is to provide a recommendation regarding formal enrolment in the OnCourse® Developments programme.

The recommendation is informed by a review of the fundamental sustainability opportunities and challenges the project is likely to generate, to ensure that it has the potential to deliver the very highest standards in sustainable development.

SCOPE OF THE PROGRAMME

It is regarded as fundamental to the aims of the OnCourse® Developments programme that a project has the potential to deliver a fully integrated sustainability concept, in which golf is embodied. In this instance it is proposed that the OnCourse® Developments programme should include development of the two golf courses at separate sites under the umbrella for the purpose of this report of Comporta Developments.

It is important to note one golf course (Course One - Herdade da Comporta) is partially built at the time of writing and the scope of the *GEO Certified® Development* application would encompass construction work carried out from 2021 onwards and explicitly does not assessed retrospective construction activities. Therefore, the project components within the scope of the programme are including:

Course One – Herdade da Comporta

- Completion of a partially built 18-hole golf course
- Practice grounds
- Clubhouse
- Maintenance facility
- Any auxiliary structures such as starters hut – To be determined.

Course Two – Comporta Torre

- 18-hole golf course
- Practice grounds
- Clubhouse
- Maintenance facility
- Any auxiliary structures such as starters hut – To be determined.

Moreover, the OnCourse® Developments programme philosophy requires that the sustainability potential of the project extends beyond the property boundary, to interface with, and embrace, the wider social, economic and environmental context of the site and its surrounds.

METHODOLOGY

Project Appraisal constitutes an initial review of the core aspects of the development project. Should the project be formally enrolled in the OnCourse® Developments programme, this process will be extended incrementally to explore the relevant sustainability issues at progressively more detailed levels, corresponding to the following stages of development:

- Design
- Construction
- Certification

The Project Appraisal therefore focuses on investigating the broad compatibility of the project with GEO values and aims, rather than detailed specifics. It includes the following key tasks:

- Review of the main components of the project as currently defined.
- Appraisal of key sustainability issues generated by the project, in order to identify and understand the main opportunities and challenges in relation to the 2nd Edition of the Sustainable Golf Developments Guidelines² and Voluntary Sustainability Standard³.
- Advice and guidance on fulfilling the project's sustainability potential through the subsequent stages of the process.

These tasks have been informed by:

- Review of documents provided by the project team directly.
- A detailed review of general literature sources, environmental assessment reports (DIAs), site photographs and websites.
- Discussions/telephone conferences with the project team representatives.

² http://www.sustainable.golf/get_involved/developments/sustainable_golf_development_guidelines

³ <http://www.sustainable.golf/vision/action/standards/developments>

3. PROJECT

The purpose of this section of the report is to provide a brief overview of the context of the project with respect to the main factors potentially influencing sustainability. The site information is drawn primarily from the baseline study undertaken for the project.

PROJECT SITE

The site is located less than 1km from the shores of the Atlantic Ocean with few small towns located within the vicinity.

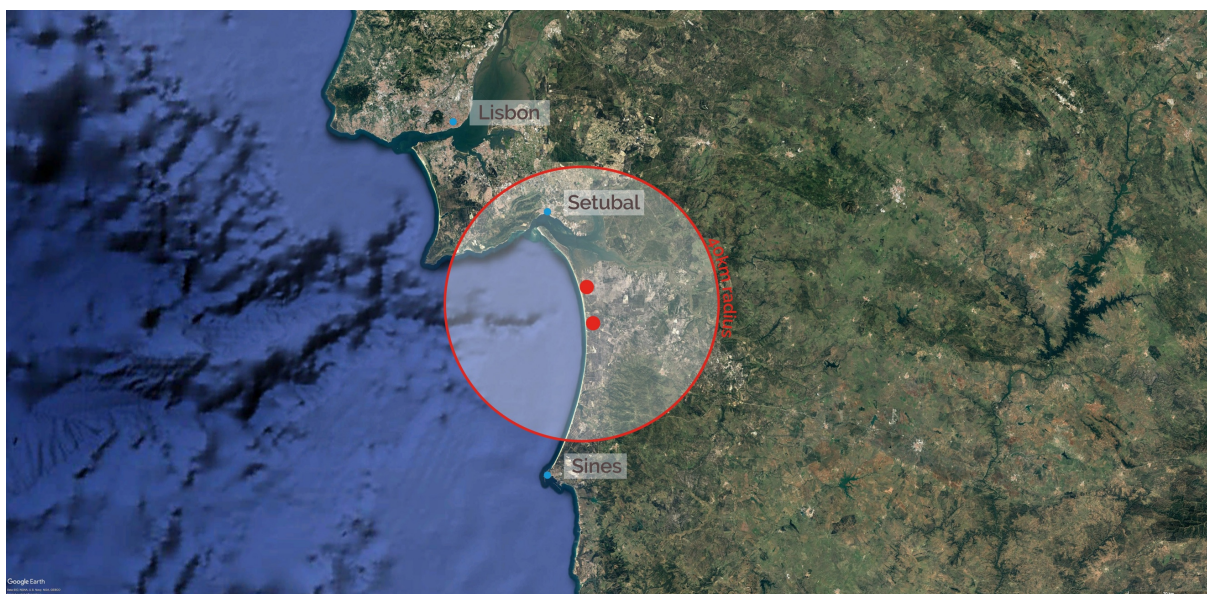


Figure 1: Aerial photo of Context (Source: Google)

The project site is around 130km by car from Lisbon where there is an international airport. There are a few other golf courses in the region and 2-3 others planned for future development. The area is fairly sparsely populated and a popular holiday region, which is well known for its beaches and secluded spots.

Tourism and various forms of agriculture are the major industries in the region with visitors often coming from Germany, UK and Sweden to visit the beaches, lakes and woodlands of the area.

There are a number of nearby protected environments in the region notably the Natura 2000 Comporta / Galé designated⁴ as a Site of Community Importance (SCI) in 2008.

⁴ <http://natura2000.eea.europa.eu/Natura2000/SDF.aspx?site=PTCON0034>

PROJECT SITES

The overall site is approximately 100 hectares (245 acres) of former agriculture land that now has partial golf course construction shaping evident but left to lie fallow of circa 8-10 years. As a result of the previous construction activities, the site is now overgrown with a broad mix of weed and self-seeding plant species on top of a disturbed sub-soil and topsoil profile.



Figure 2: Site Aerial indicating both courses (Source: Google Earth)

The overall site area of the two courses is as follows: Course Two is approximately 360 hectares and Course One is approximately 210 hectares. There are no significant existing structures on either site except roadways being constructed currently for the golf site and the views are contained mostly by elevation changes and existing tree plantation.

The climate and availability of water is not a cause for concern currently and initial investigations with the local authority regarding access to groundwater are underway. The temperatures get lowest (less than 12 C on average) between December – April, with June – September bringing temperatures over 21 C on average. Average annual precipitation is around 775mm with the months of October – February experiencing the highest volumes of precipitation. The climate is a typical Mediterranean climate⁵.

⁵ <https://www.britannica.com/science/Mediterranean-climate>

Course One – Herdade da Comporta Site: The vegetation on the site was dominated by pine trees both natural and plantation with pockets of coastal dune scrub, cork and oak trees. These have been selectively cleared during construction of the initial golf works. This has resulted in more light penetrating and initial signs of native seed banks becoming established.

The site has rolling terrain and has a balance of open and closed views, lending itself very well to golf course creation with minimal grading and manipulation being required. The soil appears to be very well suited to golf course creation, of very sandy texture and free draining qualities. This suggests that a relatively fast, light and straightforward remaining construction timeframe and construction methodology should be possible.

Course Two – Comporta Torre Site: The vegetation here is still dominated by pine trees both natural and plantation with pockets of coastal dune scrub, cork and oak trees. There is clearly some good ecological value in the patches of native natural habitat area.

The site as similar undulating terrain with view enclosed in this site by surrounding dune type landscape. The soil also appears to be very well suited to golf course creation, of very sandy texture and free draining qualities.

SUMMARY

The proposed Comporta Development comprises of two golf courses on separate sites.

Golf Course One – Herdade da Comporta

Herdade da Comporta to comprises an 18-hole golf course, driving range; short game area. Other core golf components include the clubhouse, starter's hut, rest station and maintenance building.



Figure 5: Illustrative golf plan of Herdade da Comporta Torre (Source: Client)

Grading works have been completed for over 50% of the golf site with turf grass seed being grown in on over 50% of the course. Construction works continue on the rest of the property. GEO's understanding is that mass earthworks are 100% complete for the golf, with fine shaping work and finishing works being in progress.



Figure 4: Typical site view of partially built Course One (Source: Client)

As the site is partially graded for golf, it is possible to make out the general corridors of the holes and grass areas of the most advanced holes. There are pockets of established native vegetation establishing that have appeared over the past few year while the site has been dormant. There are also constructed swales and waste bunkers where they were proposed in the original golf and landscape designs.



Figure 5: Some typical views of the shaping completed in the out-of-play areas. (Source: Client)

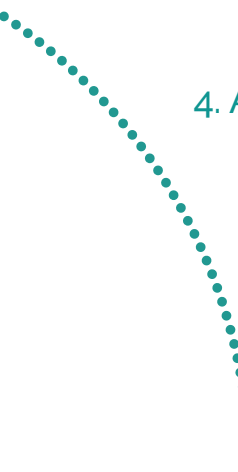
Golf Course Two = Comporta Torre

Comporta Torre comprises an 18-hole golf course, driving range; short game area. Other core golf components include the clubhouse and maintenance building.



Figure 6: Illustrative golf plan of Comporta Torre (Source: Client)

Course One is set to complete construction in Q3 2021 and Course Two is set to begin Construction in Q3 2021.



4. APPRAISAL CHECKLIST



Golf Course One – Herdade da Comporta:

AREA	OPPORTUNITY	CHALLENGE
SITE SELECTION	1. Course One only: Site is already a partially built golf course which hold good potential for a low impact golf course on very well suited terrain. 2. Nature of development will secure the protection of the open space within the protected site. 3. There are numerous natural features and planting that can add to the character and natural interest around the course. 4. The site is close enough to large population centres of Lisbon to be easily accessible for visitors. 5. The climatic conditions and subtle terrain make the location well suited for golf course creation.	1. The site is within the Nature 2000 as noted in the report text above, which brings high levels of control and places high conservation values on some of the habitats within the site. 2. Changes to design since its conception maybe needed to keep pace with market expectations. 3. Additional environmental oversight of construction activities is likely given the sensitivities of the site.
NATURE	1. Opportunity to improve the biodiversity of the site from the previous pine plantation areas of the site. 2. Increase in the population of protected flora and fauna is possible if correct landscape and habitat creation is achieved. 3. The designs set aside significant areas of the site to 'native habitat' with generous patch sizes. 4. Likely existing soils contain a rich bank of dormant seeds that could be harvested or at least encouraged to germinate through conservation led land management techniques.	1. Course Two only: Connectivity of the habitat areas to the wider landscape natural areas appears to be more challenging than in the course one designs. 2. The tight controls of the Natura 2000 site is the overriding challenge of developing both sites. 3. Long term monitoring and survey work is likely to be thought desirable for any net biodiversity gains to be found through habitat creation. 4. Building designs have not been seen at this time.
RESOURCES	1. Proposals indicate comparatively small areas of turfgrass and implies water saving measures have been considered in design. 2. Native soils appear to be good quality for use in the construction build ups. 3. Early work done to collect plants and seed bank in an on-site nursery should result in significant savings in terms of plant material supply chains both in construction and in the future. 4. Given the site terrain a limit earthworks volume has been proposed and could result in a comparatively very low carbon footprint for grading operations. 5. Early discussions include consideration of future TSE supply for irrigation demands.	1. Course One only: Given the partially built nature of the site, earthwork for this proposed construction phase will be likely lower and less disruptive. 2. Unconfirmed good source of sand for green's rootzone material at this time. 3. Maintenance facility designs are unknown at this point. 4. Cart path material is unknown at this point and is currently proposed as wall-to-wall layout on both courses. 5. Energy provisions and proposed infrastructure is unknown at this point.
COMMUNITY	1. Opportunity to enhance natural heritage value of the area through preservation of its valued flora and fauna. 2. Opportunity to create improved quality facilities and access to outside recreation, walking, cycling, nature watching, physical exercise and other non-golf activities.	1. Business model and accessibility of the course is unknown at this point. 2. Further discussions are required to understand the intentions for social value or community opportunity to be realized at both sites. 3. Given the semi remote location, providing viable multi modal and active travel options for future staff and grounds workers will be important.

LIMITATIONS

The content of the Project Appraisal is drawn from information contained within exiting project documentation and surveys carried out by consultants hired by the Client group. It reflects information correct at the time of writing, it is possible that new information will become available after the completion of this report. This new information would be incorporated into future revisions of this report or in the subsequent stages of the certification reporting.

APPENDICIES

A: CRITERIA CHECKLIST⁶

⁶ To be read in conjunction with the “Sustainable Golf Development – Voluntary Sustainability Standard. First Edition”

A. CRITERIA CHECKLIST

PREPARATION STAGE:

Baseline 3 of 3

Improvement 1 of 1

Criterion	Objective	Detailed Performance Requirements	Notes - OK / Pending / No
P1B	Appropriate site selection	Ensure all efforts are made to: minimise development of prime agricultural land; protect land supporting local livelihoods; protect floodplain capacity and conserve threatened and/or endangered habitats and species.	OK Development for both courses in NATURA 2000 site has been agreed with local authorities based on significant mitigation measures.
P2B	Establishment of legal context	Demonstrate that alternative sites have been considered and that Free and Prior and Informed Consent (FPIC) or equivalent has been agreed. Ensure clarity around land ownership, transport access and legal permits.	OK Planning permission for the golf course and maintenance buildings are in place.
P3B	Economic due diligence	Ensure an economic feasibility study has been carried out to determine the economic sustainability of the project.	OK Carried out as part of previous planning applications.
P4B	Promotion of development team leadership	Ensure that development team is committed to sustainable development, aware of its role and has expertise to deliver. Preferred nomination of a “Sustainability Leader” on the project team.	OK A project leader has been in discussion with GEO regarding the project’s intentions. A clear understanding of sustainable development principles is evident since 2010 when Comporta Developments was first known to GEO.
P5I	Economic, environmental and social due diligence	Ensure that, in the feasibility study, all material issues have been considered and addressed in their environmental and social contexts.	OK Social impacts have been assessed as part of EIA and other supporting documents for previous planning submissions with social benefits proposed being identified.



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