

TERRAS DA COMPORTA TORRE PORTUGAL

Sustainability Blueprint V1

Design Stage

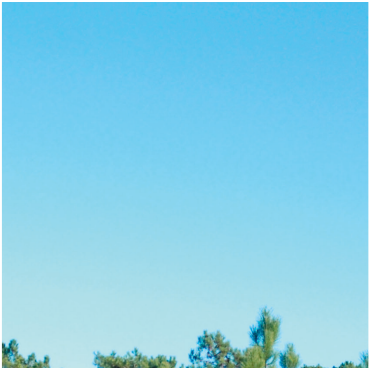
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Sustainable.Golf

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Site Images form Site (Credit: Author)



A photograph of a dense forest of tall, slender pine trees. The trees are dark green and fill most of the frame. The sky is a clear, pale blue. The text is overlaid in the center of the image.

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 honour the natural environment.

INTRODUCTION

Project Journey

Preparation Stage
Project Appraisal

Design Stage
Sustainability Blueprint V1

Construction Stage
Sustainability Blueprint V2

Completion Stage
Certification Report

This Sustainability Blueprint V1 has been prepared by GEO in order to present a concise summary of the anticipated sustainability outcomes generated by the project. It aims to outline the practical ways in which this golf development will benefit local communities, individuals, and the environment.

It provides a comprehensive understanding of the golf project's sustainability vision and goals, and outlines a roadmap showing how these will be translated into real world deliverables in the subsequent stages of the project.

The V1 Blueprint forms the key milestone report, for Torre Golf Course on the pathway to receiving the GEO Certified® Development mark.

The GEO Certified® Development mark is the international sustainability certification system for golf design and construction. It represents the highest available standard of sustainable design and construction for the golf industry.

The mark aims to distinguish the world's most sustainable golf developments. It gives credible recognition to projects which demonstrate leadership from local through to global level in all three pillars of sustainability; environment, society, and economy.

The project is independently verified at key milestones corresponding to the following stages of golf development:

1. **Design**
2. Construction
3. Completion

This Sustainability Blueprint V1 report corresponds to the design stage of the certification process. For more details of the certification system, its process and assurance model visit <http://www.sustainable.golf>. Torre Golf Course formally registered in the OnCourse® Developments programme in December 2021.



OVERVIEW

PROJECT OVERVIEW

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 studies undertaken for the project.

REGIONAL CONTEXT

This area of Portugal can be classed as semi-rural with a fairly sparse population and low population density. Tourism and various forms of agriculture are the major industries in the region, this also means that the population is fairly transient and fluctuates depending on season.

Golf as a sport for the local communities and tourists is popular in this part of the country with a four golf courses in the region and 2-3 more planned for future development.

The climate is a typical Mediterranean climate¹ which is a contributing factor to the popular tourist industry. The temperatures get lowest (less than 12°C on average) between December – April, with June – September bringing temperatures of over 21°C on average. Average annual precipitation is around 775mm with the months of October – February experiencing the highest volumes of precipitation.

This area of the Alentejo coast constitutes one of the widest systems of active and relict sand dunes on the entire European coastline. The site comprises of a diverse assemblage of aromatic shrubs in combination with gently-rolling, large-scale relict dunes, creates a distinctive and readily-appreciated sense of place. There is a very clearly defined primary dune crest inland of the beach.

There are a number of nearby protected environments in the region notably the Natura 2000 Comporta / Galé designated² as a Site of Community Importance (SCI) in 2008. The site lies partially within the Natura 2000 area.

¹ <https://www.britannica.com/science/Mediterranean-climate>

² <http://natura2000.eea.europa.eu/Natura2000/SDF.aspx?site=PTCON0034>



Figure 1 - Aerial map (source: Google Earth)

PROJECT SITE

The project site is around 130km from Lisbon, this journey takes around one hour by car. There is an international airport in Lisbon making this site accessible to a large market. The site itself is approximately 365 hectares in area. Views from the site are contained due to the surrounding dunes, although from some higher points there are ocean views.

The site is sat within a designated site of cultural importance due to the unique landscape features mentioned earlier. The site has a rolling terrain with a dune landscape and soils which appear to be ideal for golf course construction – very sandy in texture and free draining.

Water availability is becoming very scarce in this part of the world – there are no surface water features on the site at present. The site is dominated by a mixture of natural and plantation pine trees.

Pockets of coastal dune scrub as well as Cork and Oak trees make up the rest of the vegetation pallet. In its current condition the site shows

good ecological value in native habitat areas. The site has been cleared in places around 10 years ago and this has had an impact on the quality of the landscape vegetation, which shows signs of some regenerating native species coming back.

The areas of the site where golf will be played are reasonably flat meaning the site could be walkable if climatic conditions permit. The hills surrounding the proposed course location bring a dramatic change in elevation adding to the character of the site.

CLIENT VISION

The vision here is to create golf course which merges seamlessly with the natural character of the area, allowing the golfer to truly experience the unique dune environment. To carry this out while having a beneficial impact on the local environment and communities would see this project deemed successful and be in keeping with the ethos of the project and the client.

The client for this development (Vanguard Properties) are a real estate developer based in Portugal. It is one of the integral missions of the client to ensure that all projects they works on are 'developed in an ethically responsible way that respects the environment and the community in which they are built.' They aim to have a healthy impact on the community where the development occurs and leave a positive mark on the lifestyle of locals. They are currently bringing together a project management team with experience of developments within sensitive areas.

Vanguard Properties tend to work on projects that take advantage of the Portuguese climate where the location is a special one. They work to create an exclusive feeling in each of their developments while contributing to the local community and respecting the history and tradition. They are fully aware of the impact that property development has on the natural environment.



Figure 2 - Aerial Photo of site (source Google Earth)

PROJECT SUMMARY

The project aims to create an accessible and challenging golf environment which includes:

- 18-hole golf course
- Substantial practice and teaching area
- Maintenance facility
- Clubhouse



Figure 3 - Vegetation on site (Source: GEO)





Figure 4 - Course Layout (Source: Client)

ROADMAP

Narrative Roadmap

The Torre project team are addressing a wide range of social and environmental issues throughout the planning, design and construction of a golf and multi sports resort facility. The roadmap below outlines the approach of the golf team and the actions that are being undertaken on and around the golf course to ensure that nature conservation; resource efficiency; social value and climate action are all fully integrated into the project from the start.

SUSTAINABILITY OVERVIEW

Given the sensitive nature of the surrounding landscape and Natura 2000 designations at Torre, there is an increased understanding and commitment to conserving and enhancing the land - to improve its health and promote native species to flourish.

There is a knowledge of how important resource selection and use is to ensuring the development is truly sustainable. The project team here are committed to using local materials and workforce as far as possible. This not only reduces the transport required and associated CO₂, but it ensures the visitor experience is authentic and contributes back to the local economy.

By using these local sources a relationship can be built with suppliers which will benefit everyone throughout the lifetime of the golf course. It is a sure way to foster strong long-term connections with the local community.



Figure 5 - Site Photos (Source: GEO)



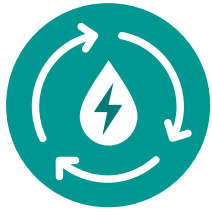
Nature

As this development is situated within a Natura 2000 site the way it works in harmony with nature is of huge importance. A careful approach will be taken to multi-phased site clearing, ensuring that the minimum amount of land is cleared for the golf course, this approach will include selective removal of vegetation and incorporation of 'found' features. This approach will see a significant proportion of the site's natural habitats preserved. The course will be shaped in a way that respects the natural shape and contours of the land. The outcome is intended to be a course sitting 'quietly' in the landscape surrounded by the natural environment of this part of Portugal.

Careful consideration will be given when it comes to native vegetation selection throughout the surroundings of the golf course. Wherever possible existing vegetation will be preserved and retained to minimise reinstatement areas. When needed, only native locally sourced flora species will be used. This will ensure that the character and feel of the area is retained and will seek to increase ecosystem function and biodiversity throughout the site. In a further bid to offset any impacts caused by this development, the project is leasing approx. 250 hectares of land immediately to the north of the development site. The land is currently in poor condition and the aim is to remove invasive species, then enhance and improve this area - moving it towards a more favourable conservation status.

The nature goals will be specifically delivered by:

- Minimal earthmoving to respect the existing land and natural contours.
- 80hc of the 145hc site being undisturbed and a further 22hc being recovered.
- Ensure that all conditions of working within a highly sensitive Natura 2000 site are strictly adhered to.



Resources

The land here presents the ideal conditions to build not just a golf course, but one to the highest sustainability standards. The turfgrass area and irrigated land will be kept to an absolute minimum across the site for an 18-hole golf course and premier academy facility. The majority of this water will be sourced from treated sewage effluent (TSE) generated on site and from the local communities.

The sand that currently exists on site is a ready-made rootzone type material which looks to be of a high standard. By using this native sand for fairways and tees this will greatly reduce the need for imported sands and project's potential carbon footprint. This will also reduce the amount of plastic drainage pipe throughout the course due to the free-draining properties of the native soils.

Electric and hybrid vehicles and machines will be utilised where appropriate for both the golf cart and course maintenance fleets. Micro renewables will be explored to support the energy demand of the electric fleet.

Material reuse across the site will be a fundamental ethos during this development, as well as the extensive use of native soils and 'found' site objects such as rocks can be used in construction and course finishing (simple tee markers, maintenance path edging and signage).

The resource goals will be achieved by:

- Irrigated areas on the site will be confined to less than 33 Hectares
- Nature led solution to drainage of turfgrass areas to reduce plastic pipe installed to less than 1,500 linear metres.
- All fairways, tees and greens to be constructed using native soils.



Community

This area of land is cultural important to the region's identity and as such it is important for the development to establish a positive relationship and contribute back to the local communities. Throughout construction the golf course will use local companies wherever possible to carry out the work and this idea will carry through to operation where locals will likely be employed for course management and caddying positions.

The introduction of this construction, and eventually service based work, to the local area will increase economic activity in the region. The development will also ensure that this land is protected as open recreation space for years to come and by presenting opportunities for golf and non-golf activities such as walking and cycling trails, making the site accessible to a wide range of people to enjoy the beauty of the site and feel connected to the place.

The resource goals will be achieved by:

- Establishing a world class sports and activity centre immersed in the natural landscape of Alentejo.
- Investing in creating accessible native landscape and protecting and enhancing that biodiversity and health of that landscape.



Figure 6 - Site Photos (Source: GEO)



Tabular Roadmap

Target Code	Project Targets	Supporting Documentation
Nature		
N1	The golf construction will strictly limit disturbance to the native vegetation areas to no more than 64 hectares and ensure any disturbed areas outside of turfgrass are reinstated using native locally sourced plants - approximately 27 hectares.	Clearing/tree location plan, Rehabilitation area note
N2	Removal of all non-native and invasive vegetation species across area around the golf site (approximately 85 hectares) with the aim of enhancing the health and native diversity of the landscape.	Habitat management plan
N3	Create contiguous habitat patches to maximise health and function of the native landscapes for local fauna - wherever possible ensuring that these directly connect with habitat patches outside the site.	Clearing & tree location plan
N4	Retain the maximum amount of mature existing native tree within and around the golf course area.	Clearing & tree location plan
N5	The course is designed to flows with the shape of the land, requiring little earth movement and no impact on the dunes themselves.	Grading plan
N6	100% of diseased tree species will be removed from the site and a monitoring plan and regime put in place to stop the spread and maintain the integrity of the site.	Habitat management plan
N7	Improvements to be made to the habitat in the 254 hectares of compensation area (removal of invasive species, enhancement of native ecosystems, biodiversity studies and making accessible pathways or areas for the public).	Compensation area management plan Meeting minutes 220215
N8	Local and natural 'found' materials from the site such as rocks, to be used in construction or for small signage and other informal path edging or maintenance uses if suitable.	Golf Construction Specifications pg 46
N9	Creation of small-scale habitat opportunities for birds, bats and invertebrate to potentially inhabiting the golf course area post construction.	Habitat management plan
N10	More than 13 hectares of out-of-play areas will be re-rehabilitated with exotic species removed and native planting promoted through proactive management practices.	Landscape Re-naturalisation areas



Target Code	Project Targets	Supporting Documentation
Resources		
R1	Turfgrass area should be kept to a minimum – no more than 34 hectares including the academy area.	Grassing plan
R2	Turfgrass to be grown on and sourced locally (within 10km of site) and a Portuguese nursery.	Meeting memo 220215
R3	Select a turfgrass that is well suited to the climate, tested in the area and requiring minimal inputs and water.	Grassing selection detailed on grassing plan
R4	Use nature led drainage solutions and utilise the free draining soil properties to cope with surface water - meaning plastic piped drainage systems is kept to a minimum – Not exceeding 1,500 linear meters.	Drainage plan email
R5	Zero imported sands to be used in the construction of fairways and tees	Grading plan Rootzone profiles – Tee/fairway
R6	Minimal earthworks with zero exported bulk earth materials from site and less than 200,000m ³ overall earthworks volume.	Cut & fill plan
R7	Cart paths to be no longer than a total of 11,000 linear meters in length.	Cart Path Plan
R8	The potential to use the native seed bank in the upper layer of native sand and soils will be looked at across the site to encourage faster regrowth of native vegetated areas.	Golf Construction specifications
R9	Irrigation system designed to maximise energy and water efficiency through: - Pump sizing, quantity and location - Heads selection and layout - Head controls on greens and other specialist areas - Split pressure delivery to maximise water efficiency - Mobile soil moisture sensor probe - On site weather stations for daily adjustment in scheduling	Irrigation specifications
R10	Irrigated areas on the site will be confined to less than 34 Hectares	Irrigation plan
R11	At least 70% of irrigation will be supplied by treated sewage effluent (once produced on site).	Water management plan



Target Code	Project Targets	Supporting Documentation
R12	100% of golf cart fleet will be electric powered.	Vehicle specifications
R13	The golf maintenance machinery will use electric or hybrid machinery where the equipment is available and effective for the site and purpose.	Vehicle specifications
R14	The potential use of PVs will be explored for small scale energy provisions as part of the golf maintenance buildings.	Building designs
R15	A full and comprehensive waste management plan will aim to minimise exported waste to landfill to zero or near zero.	Waste management plan
R16	All green waste material generated by landscape management work on site will be composted on site, the resulting material should be used on site.	Waste management plan
R17	Earth movements, in particular cut depths, to be kept to a minimum, there should be no bulk construction materials removed from the site.	Grading plan

Community		
C1	Establish protected areas on the site that are valued for the fauna and flora which have important educational value.	Habitat management plan
C2	Create opportunities for non-golf activities such as walking and cycling trails as well as general nature watching hides.	Masterplan
C3	More than 70% of the construction staff on site to be Portuguese staff.	Construction staffing plan
C4	Impact positively on local jobs market with: - add a summary of numbers of potential job creation impact in both construction and operations.	Future staffing plan
C5	Provide shared transport options (e.g. bus) and/or multi modal options to commute to work for employees.	Transport strategy
C6	Create a active recreation focus destination that provide golf activities alongside and integrated with other sports and recreation activities such as tennis and paddle tennis, horse riding, cycling, running, soccer.	Masterplan



Target Code	Project Targets	Supporting Documentation
C7	Create a 'sports hub' programme that includes access for the local community as well as the resort residents.	Management plan
C8	Open compensation area to the public for guided tours and educational purposes teaching them about rare native species that inhabit the area.	Meeting memo 220215
C9	If produced then composted material made on site from green waste to be made available to the local community for use locally as well as to improve soils where needed on site.	Management plan



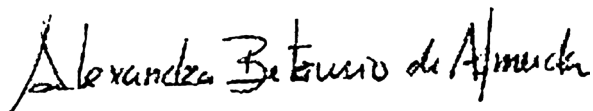
VERIFIER CONCLUSIONS

Verifier Conclusions

Following an accompanied site inspection carried out on 9th August 2022, I have reviewed the Sustainability Blueprint above in conjunction with the supporting information and have the following points for consideration:

- A complete and comprehensive management plan needs to be created which looks at the enhancement of the compensation area associated with the Torre development. This should see this area brought to a higher standard than it currently sits at whether this be in terms of nature or social use.
- A sensitive approach must be taken during the clearance phase of the site. Only vegetation that must be removed should be and this should be kept to within the golfing corridors.
- Cart path material should be permeable or at least be designed to move water run off towards drainage areas so that water can be collected and cleaned before reuse.
- Through operation the resort and golf facilities should be powered by renewable energy sourced on the site e.g. solar panels. I would like to see evidence of this plan.
- The site should move away from diesel powered generators as soon as possible, connecting to the national grid to power generators through construction.
- I would like to see evidence of plans for green waste management on the site.
- The maintenance facility should be designed and built including the highest standard of pollution prevention and be capable of supporting and electric maintenance fleet. I would like to see designs of this as they become available.

Considering all of the above information I recommend that Torre, should progress to the Construction stage of the OnCourse® Developments program.



Alexandra Almeida
Independent Verifier for Torre Golf Course



APPENDIX

Appendix - Criteria Checklist





Nature

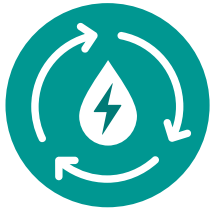
Baseline Criteria 11 of 12
Improvement Criteria 2 of 5

Criterion	Objective	Detailed Performance Requirements	Notes - OK Pending No
DN1B	Develop clear understanding of species, habitats, hydrology and geomorphology	Study in detail ecology, hydrology, designations, soils, geology and geomorphology of the site. Any invasive species to be identified and managed appropriately.	OK
DN2B	Ensure golf course and landscape design typology is clearly compatible with site and surroundings	Avoid predetermined artificial or enforced design styles.	OK
DN3B	Protect the most valuable landscape, cultural and ecological features	Avoid ecological hot spots and sensitive landscape zones. Retain existing valuable and/or protected trees, habitats and cultural sites.	OK
DN4B	Use native or locally important species in landscaping designs, and drought-tolerant varieties if applicable	Landscape planting to maximise native, naturalised, locally adapted and important species (exceptions for some sites where aesthetic or cultural heritage issues are relevant, or for garden areas).	OK
DN5B	Ensure that any topographic changes protect and enhance landscape character	Ensure no degradation to existing landscape character.	OK
DN6B	Consider whether open water is appropriate	Provide clear justification for any open water in desert/arid locations	OK
DN7B	Minimise pollution from maintenance facility	Plan early how to integrate best practice pollution control measures into maintenance facility design.	Pending
DN8B	Plan an ecologically rich landscape	Maximise the integration of native habitats and ecology in the design	OK
DN9B	Maximise habitat patch sizes and connectivity	Internal habitat patches to be large enough for identified key species. Link internal patches, maximise habitat size, and create connections to wider landscape habitats.	OK



Criterion	Objective	Detailed Performance Requirements	Notes - OK Pending No
DN10B	Adopt a 'natural systems' approach to water management, considering water quality and habitat creation	Utilise natural soakaways, attenuation areas, swales and turfgrass biofilters. Incorporate vegetative buffer zones into design. Allow seasonal flooding where possible. Demonstrate that water table control does not adversely impact upon the quality of surrounding water and habitats.	OK
DN11B	Naturalise any water features as far as possible	Create diverse, living lakes and wetlands suitable to the site, maximising ecological value as far as practical	N/A
DN12B	Minimise visual intrusion of bunkers, tees and green complexes on visually sensitive sites	No significant adverse impacts on visual amenity of key receptors or viewpoints.	OK
DN13I	Consider the visual impact of core golf buildings	Avoid prominent or highly exposed positions and breaking skylines. External materials to be in keeping with geographical region.	OK
DN14I	Use permeable surfaces	Hard surfaces on the golf course property, such as cart paths, to be made of permeable materials.	Pending
DN15I	Minimise the extent of intensively managed turfgrass areas	Minimum area of the site within the development boundary to become intensively managed turfgrass.	OK
DN16I	Increase ecological interest of the external skin of the core golf buildings	Utilise ecological building techniques such as green roofs, green walls and insect housing.	Pending
DN17I	Minimise the visual impact of signage and furniture	Maximise the use of local sustainably sourced materials and position to integrate with the surroundings.	OK





Resources

Baseline Criteria 12 of 12
Improvement Criteria 4 of 5

Criterion	Objective	Detailed Performance Requirements	Notes - OK Pending No
DR1B	Ensure responsible use of site and surrounding water resources, including watershed	Undertake and analyse baseline surveys to ensure informed water resource decisions and implement recommendations, particularly on water sourcing.	OK
DR2B	Seek opportunities to minimise energy use in design	Design to minimise energy use and demonstrate how this is achieved.	OK
DR3B	Minimise impact on key hydrological and flood zones on site if applicable	Avoid these areas for built development and net positive fill.	OK
DR4B	Minimise volume of earthwork	Design a course which does not require excessive earthworks in order to minimise fuel use during construction.	OK
DR5B	Maximise irrigation water efficiency	When needed, install irrigation systems and technologies, such as weather stations, to deliver the correct amount of water most efficiently to the smallest possible area. Restrict irrigation only to genuine priority areas with flexibility in the system to control application areas. Identify ways golf course irrigation water can come from recycled or 'off grid' sources.	OK
DR6B	Use local materials	Minimise the average total distance construction materials will travel. Give preference to onsite or locally, responsibly and sustainably sourced materials where feasible.	OK
DR7B	Select best-adapted turf species and cultivars for the local environmental conditions and to minimise long-term resource requirements	Maximum stress, disease, temperature and drought-resistant species to be selected where possible. Select grass species with moderate maintenance requirements such as mowing and top dressing rates. Consider these long-term maintenance impacts, budgets and the final quality of the playing surface in the decision-making process.	OK



Criterion	Objective	Detailed Performance Requirements	Notes - OK Pending No
DR8B	Optimise location of core golf buildings to benefit from natural heating, cooling and lighting	Analyse the location and aspect of core golf buildings.	OK
DR9B	Reduce fuel use in maintenance	Consider ease of maintenance access and mowing regimes to avoid excessive fuel use. Consider the use of electric- or hybrid-powered maintenance machinery.	OK
DR10B	Maximise the energy efficiency of drainage design	Justify the use of piped drains in light of criterion DN10B	OK
DR11B	Maximise the energy efficiency of irrigation system	Design irrigation system to maximise benefits of topography, soil type and climatic conditions. Design irrigation system to optimise use of pipe and wire. Consideration to be given to use of recycled HDPE or an equivalent high-quality pipe material.	OK
DR12B	Minimise fuel use in buggies	Design a golf course that can be walked where climate and terrain permit. Use electric- or hybrid-powered buggies if they are required.	OK
DR13I	Use recycled materials and materials with recycled content	Maximise the integration of recycled material into the supply chain. Where available, maximise use of certified products and materials equal to ISEAL Alliance standards.	OK
DR14I	Manage precipitation onsite	Define the amount of precipitation to be retained and released from the site. Optimise the water management design to benefit the entire watershed.	OK
DR15I	Consider development as 'net zero energy'	Assess the potential of onsite or local renewables such as solar panels. Assess the feasibility of exporting onsite- generated energy back to the national grid. Integrate either or both where possible.	OK
DR16I	Integrate re-use and re-cycling of water around core golf buildings	Where possible, utilise harvested rainwater for greywater for golf and landscape irrigation as well as cart and machinery wash down.	OK
DR17I	Achieve an appropriate sustainability certification for the non-golf buildings within the property	Undertake an appropriate sustainability certification from the relevant authority/ organisation for all non-golf buildings on the property.	Pending





Community

Baseline Criteria 6 of 6
Improvement Criteria 1 of 5

Criterion	Objective	Detailed Performance Requirements	Notes - OK Pending No
DC1B	Define supply chain of products and materials	Identify key opportunities and challenges in materials supply and demonstrate how they can be addressed.	OK
DC2B	Undertake local consultation	Consult with local community and advertise to raise local awareness. Encourage input through meetings/ open days, in writing, by phone and via email.	OK
DC3B	Protect cultural heritage	Design to protect and/or incorporate features of historical and cultural significance if any.	OK
DC4B	Ensure principles of 'Access for All' are implemented	Proactively consider all requirements for accessible core golf buildings to meet the access needs of disabled people.	OK
DC5B	Incorporate public access where appropriate	Maintain an appropriate type of community access to all or part of the property, or mitigate any detrimental affects to the existing situation.	OK
DC6B	Justify transport impact	Minimise the demands placed on the community's transportation network through development both in construction and long-term. Promote future multi-modal transport methods as part of wider sustainable travel networks.	OK
DC7I	Undertake local engagement	Engage with, listen and respond to local opinion. Encourage input through meetings/ open days, in writing, by phone and via email and give transparent feedback on how identified issues have been addressed.	Pending



DC8I	Promote ethically and environmentally led procurement	Define policy for procurement of products and services. Suppliers and contractors to conform with Ethical Trading Initiative's base code or equivalent.	Pending
DC9I	Promote community integration and awareness	Establish ways in which the development can contribute to local communities, for example, promoting publicly accessible outdoor facilities onsite or events programmes to help raise awareness of sustainability issues, such as local ecology, cultural heritage and renewable energy.	OK
DC10I	Incorporate educational values	Design in educational opportunities such as placements, open days (i.e. pre- and post-construction) and onsite classroom facilities etc.	Pending
DC11I	Promote and improve community health and well-being	Incorporate opportunities for non-golf- related health and well-being activities appropriate and proportional to site conditions, project scope and location.	Pending



Limitations

The content of the Sustainability Blueprint V1 is drawn from information contained within exiting project documentation and surveys carried out by consultants hired by Vanguard. 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.



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