

The Highland Council

North Planning Applications Committee  
27 October 2015

Agenda Item	5.2
Report No	PLN/058/15

**15/02012/FUL: Kames Fish Farming Ltd (KFF)**  
**Northwest of Lower Milovaig, Loch Pooltiel, Skye**

**Report by Head of Planning and Building Standards**

### Summary

**Description:** New marine fish farm for Salmon and Rainbow Trout (revised application)

**Recommendation:** GRANT planning permission with conditions

**Ward:** 11 – Eilean a' Cheò

**Development Category:** Marine Fish Farming Local (with EIA)

**Pre-determination hearing:** none

**Reason referred to Committee:** 77 objections, one of which from a statutory consultee

## 1.0 Proposed Development

- 1.1 This is a revised version of a fish farm proposal at Loch Pooltiel which was submitted in 2013, and subsequently withdrawn. The current proposal would locate the farm a little further west, in a position about 600m NNW of the branch road at Lower Milovaig [see *location maps - Diagrams 1 to 3*]. The nearside cages would be a minimum of 150m out from the shore whilst the cages on the outer (seaward) side of the installation would be a maximum of about 280m out from the shore.
- 1.2 The proposed fish farm would consist of 12 circular cages, each 100m in circumference, in a single group of 6 x 2, using a 300m x 80m mooring grid. It would also include an automated feed barge of a boat-like design (20m x 10m x 7m high above the waterline) with capacity for 160-170 tonnes of feed. The feed barge would be positioned on the shore side (south side) of the installation, towards the western end of the cage group [see *site layout and barge details at Diagram 4 to 6*]. The barge would be linked to the 12 cages by pipes carrying the feed. The total area of sea surface which would be occupied by the equipment would be 9747 sq m, whilst the sub-sea moorings array would extend over an area of 17.2 hectares. Some moorings cables will be anchored onto the adjacent foreshore.

- 1.3 The proposed maximum biomass of fish which would be stocked on the site at any one time would be 2500 tonnes (for which CAR consent has been granted). Feed would be delivered by sea from the mainland and harvesting would be by well boat.
- 1.4 Day-to-day access for personnel and equipment would be from Meanish Pier. The company aims to use the existing building there as a shore base and expects the fish farm to directly generate 4 full-time and 2 part-time jobs.
- 1.5 KFF's earlier fish farm planning application for Loch Pooltiel was screened and scoped for EIA in March 2013 and the applicant prepared an Environmental Statement accordingly. The applicant has updated the Environmental Statement to take account of the revised proposal

## **2.0 Site Description**

- 2.1 The proposed site is just inside the mouth of Loch Pooltiel on the south side. The coastline adjacent is a line of steep cliffs, approximately 30 to 50m high at this point, which rise from east to west. Immediately adjacent to the proposed fish farm site, the land behind the sea cliffs is rough pasture. Next to this, on the landward side, is the croft land and settlement of Lower Milovaig. The closest inhabited house would be about 600m from the nearest fish cage and 700m from the site of the proposed feed barge. The fish farm would likely be most visible from houses approximately 800m distant on the higher ground in Lower Milovaig, either side of the north-western end of the road which links Lower to Upper Milovaig. It would also be visible from houses on the higher ground up beyond the head of the loch at Feriniquarrie and Fasach, but at a considerably greater distance (3 to 5 kms).
- 2.2 There is a lightly worn path along the coast, following the crest of the cliffs to the high headland of An Ceannaich and then on to Neist. This route is used by walkers fairly regularly and is publicised locally.
- 2.3 Loch Pooltiel is a relatively short sea loch and it does not really have any "narrows" as such. It widens progressively to the north and west and is therefore exposed to winds from those directions. The proposed fish farm site, sitting at the mouth of the loch, is therefore likely to experience severe weather more often than most established fish farm sites in Highland.

## **3.0 Planning History**

### **Recent proposals at Loch Pooltiel – pre-application advice, the initial KFF application and subsequent revision**

- 3.1 The company sought pre-application advice for its initial proposal to site a fish farm near Lower Milovaig in December 2012. On the principle of development, siting and design, the Council's pre-application advice (ref. 12/04864/PREAPP) included the following:

*The site is particularly close to the settlement at Milovaig and impact on the community residential amenity at this location is likely to be a key consideration... On the basis of experience from other sites elsewhere it is possible there will be objections from the local community to the proposed development. It is therefore advisable that you seek the views of the local community and where possible incorporate these views in bringing forward proposals for this site.*

*This section of coast is classified as 'Undeveloped' in the Council's coastal development strategy. There is no general presumption in favour of or against development in such areas so the site-specific considerations will be the main determining factors in appraising the planning application.*

- 3.2 KFF subsequently applied to establish a fish farm near Lower Milovaig in July 2013 (13/02838/FUL). There was however strong opposition to the proposal (221 objections) but also 105 messages of support. The Council advised the company to consider revising its proposals to address points raised by objectors. In particular, the Council suggested that the company should consider a site 750m to 1000m further west to avoid impacting on views from properties at Lower Milovaig and to reduce the risk of adverse biological impacts on Meanish Reef, a well known recreational dive site near the pier which is used by a local dive charter business. The Council also advised that there might be less local opposition to a revised fish farm proposal if the company offered more tangible community benefits in the form of improvements to facilities at Meanish Pier. The company subsequently withdrew its initial application in February 2014 and set about preparing revised proposals.

### **Earlier fish farm development in Loch Pooltiel**

- 3.3 There is an earlier record of fish farm development in Loch Pooltiel. However, that was in the more sheltered inner reaches of the loch and smaller in scale. In 1987 the Crown Estate granted a ten-year lease for two separate areas of the inner loch to Mr N. MacPherson and specified that the development should not exceed 20 cages each c. 12m square (total cage area 2880 sq.m.).
- 3.4 In 2004 Glendale Salmon asked for an EIA screening/scoping opinion on a proposal to renew the fish farm lease in the inner loch. However, after the Crown Estate told the applicant an ES would be required, no subsequent application was lodged and the lease has now presumably expired. In advising the Crown Estate at that time, the Council pointed out that:

*“Loch Pooltiel is only a small sea loch with limited shelter and restricted width. It is also a sensitive area, which though remote, is well-populated and attractive to tourists. It is used by fishing boats and visiting yachts in the summer season.”*

A site in the inner loch could not now be redeveloped for fish farming without a new planning application.

## **4.0 Revised Elements of the Current Fish Farm Proposal**

- 4.1 When KFF withdrew its 2013 application (13/02838/FUL) the company gave notice that it would be hesitant about moving the fish farm 1000m to the west but 850 metres to the west would “possibly be OK”. However, the company subsequently tested current speeds at various positions west of its original proposed site and decided that a move that far west would not be viable. The company has therefore opted to apply for a site just under 500m west of the position which it proposed in 2013, and has pulled the site in closer to the shoreline cliffs to reduce its visual impact. The company has also changed the specification for the installation, opting now for fewer but larger cages (12 x 100m circles instead of 14 x 90m circles) and a different design of automated feed barge [see *Diagram 2*].
- 4.2 The total area of surface waters which would be occupied by the cages and barge is now 6% larger (9747 sq.m. compared with 9168 sq.m. proposed before). The cage grouping is however more compact and as a result the subsea moorings area would be 24% smaller (17.2 hectares compared with 22.5 ha before). As mentioned above, some moorings cables will now be anchored onto the adjacent foreshore.
- 4.3 In February 2015, the company asked the Council for informal views on a choice of feed barge design for the site. The company offered two alternatives – the Gaelforce Seamate design which was part of the initial application, or a new MacDuff MYS design which was somewhat larger but more boat-like. The case officer advised that an aesthetically attractive design (in this case the boat-like design) would probably be less contentious than a utilitarian one even if the former was somewhat bigger.
- 4.4 The type of feed barge proposed now is longer than before (20m instead of 14m), slightly higher above the water level (7m instead of 5m), and boat-like in appearance [see *scale drawings in Diagram 5, and example photograph, Diagram 6*].

## **5.0 Public Participation**

- 5.1 The application was advertised as EIA development on 12<sup>th</sup> June in the West Highland Free Press and the Edinburgh Gazette.

Representation deadline: 30 July (extended from 10<sup>h</sup> July)

Timeous representations: 81 (76 objections + 4 indications of support + 1 critique of the generic opposition to the fish farm proposal from wild fish interests)

Late representations: 0

- 5.2 As mentioned above, KFF’s previous proposal in 2013 generated a substantial number of written submissions (324) and objections outnumbered indications of support by a ratio of 2:1.

5.3 The material considerations which were raised and which are still relevant to the current revised application can be summarised as follows:

- impact on landscape character and quality;
- impact on the visual amenity and tranquillity enjoyed by residents and visitors at properties close to the proposed fish farm site;
- the employment and income which would be generated by the fish farm v. the potential loss of income to local businesses catering for tourists who value a tranquil and unspoilt coastal location;
- impact on wildlife and local wildlife-watching opportunities - potential displacement of large marine species (whales, dolphins, porpoises, seals, basking sharks), which are a significant wildlife attraction of this area for tourists;
- potential impact on Meanish Reef recreational dive site from siltation or pollution;
- impacts on wild salmonids in the Hamara River;
- potential community gains which could arise from development at Meinish pier

5.4 Other material concerns which were raised or given more prominence in the context of the revised application include:

- potential disturbance to and displacement of protected bird species in the vicinity of the fish farm site;
- the exposed position of the site and risk of storm damage;
- potential impact on the wreck of the 'Chadwick' – a recreational dive site at the north end of Oisgill Bay;
- pressure on local infrastructure

5.5 The number of representations this time around is significantly less (81 compared with 324).

5.6 The general thrust of the public representations on the revised application is still strongly against the fish farm proposal, although this contrasts with the position of most of the statutory consultees (see below). About one third of the objections (ie 28) came from addresses within the Milovaig/Glendale area, the rest from further afield. KFF conducted a questionnaire survey of its own to gauge support for its proposal and submitted some supportive responses which it had received but this survey was outwith the control of the Council so its results have not been taken into account here.

5.7 The Royal Society for the Protection of Birds submitted comments which cannot be summarised in full here for reasons of confidentiality. However the main gist is strong concern that birds of a protected species which favour the area close to the proposed fish farm site for roosting and nesting, will be displaced, at least during the establishment/construction phase of the fish farm. Such disturbance, if considered "reckless or intentional harassment" would be an offence under Schedule 1A of the Nature Conservation (Scotland)

Act (2004). Although the Scottish breeding population of the main species of concern is increasing, loss of this territory and disruption to its breeding activity would slow the rate of expansion.

- 5.8 Information from SEPA and from RSPB's own resources indicate that the water column here is rich in fauna and RSPB regards this area as an important feeding ground for kittiwakes – a species whose numbers around Skye and the UK in general have declined dramatically in recent years. Given the importance of this un-spoilt location for biodiversity and the likely impacts of the proposed development for certain species in particular, RSPB has urged the Council to consider carefully the losses, both short and long term, which approval of this development might bring. If, despite this objection, the Council is minded to approve the application, RSPB asks that a condition should be imposed which requires construction activity to take place outwith the nesting period.
- 5.9 Names and addresses of those who responded to the Council's consultation are set out in Appendix C. All letters of representation, with the exception of confidential responses concerning protected species, can be viewed on the e-planning portal at <http://wam.highland.gov.uk/wam/> using reference number 15/02012/FUL.

## 6.0 Consultations

- 6.1 **The Skye District Salmon Fishery Board**, which expressed reservations about the previous application but did not object to it, has now hardened its position by registering a formal objection. This is despite the revised proposal involving a site slightly further away from the nearest river than previously. The Board's reasoning is that the fish farm would increase the general threat to wild salmon and sea trout from sea lice, and its exposed position at the mouth of the loch means there is an elevated risk of escapes. The Board is concerned at the fish farm's proximity to the Hamara River – a small watercourse whose wild salmonid population it regards as "dangerously low". The Board also sees KFF as having a poor record of compliance/co-operation with the Area Management Agreement from its previous time operating in the Skye area. The Board also referred to a recent national project MIA (Managing Interactions with Aquaculture) which it believed had classified Loch Pooltiel as a 'sensitive' area. However, this perception seems to be mistaken. On the website of Rivers and Fisheries Trusts Scotland the MIAP map shows Loch Pooltiel as being in a low sensitivity category.
- 6.2 **Marine Scotland Science (MSS)** is content with most aspects of the application but remains guarded in relation to the potential impacts on wild fish. As is now customary with salmon farm proposals, it neither objects to nor supports the application with regard to that aspect. It leaves the local authority to make the call in terms of how much weight should be attached to the precautionary protection of local wild fish populations. MSS regards the proposed biomass as acceptable for this location. It noted that difficulties had been experienced with the management of sea lice at other fish farms within the farm management area (M-25). It therefore asked the applicant for further

information on how risks to effective sea lice management would be mitigated. It said that strict control of sea lice should be practiced throughout the year and asked the applicant for further information on its capacity to carry out bath treatments with chemotherapeutants if the need arose. When this information was subsequently provided MSS concluded that the arrangements were “acceptable as far as can reasonably be foreseen”.

- 6.3 **SEPA** has no objection and says the results of modelling indicate the likely benthic and water column impacts are acceptable. It points out that the natural flushing of the site seems good and the major axis of this is in a north-easterly direction (with residual current in a south-westerly direction), indicating that waste may not go into the loch but may be transported along the coast and into the Minch. It is therefore unlikely that there would be an adverse effect from nutrient loading to Loch Pooltiel from this development. SEPA has recently authorised a variation of the applicant’s existing CAR licence to allow for the revised site position.
- 6.4 **SNH** has no objection because it does not does not consider the natural heritage interests likely to be affected by this proposal to be of national or regional Importance. SNH accepts that there are likely to be local impacts on protected species and landscape but leaves it to the Council to assess the importance of these issues in the context of the Council’s own policies.
- 6.5 Having viewed the seabed survey material provided, SNH has expressed no concerns about impacts on marine habitats. It does however have concerns about the protected bird interest nearby which it says would warrant restricting the construction of the proposed fish farm to a period outwith the birds’ breeding season. It does not suggest refusal of the application. SNH accepts that if the proposed fish farm uses ADD’s (Acoustic Deterrent Devices) to deter predators, the development could result in a localised displacement of cetaceans and basking sharks. However, it thinks there is unlikely to be a major effect on these species.
- 6.6 There were no objections from **Transport Scotland, Historic Scotland, the Crown Estate or Scottish Water. Glendale Community Council** did not respond to the consultation.

## 7.0 **Development Plan Policy**

- 7.1 The following policies in the Highland-wide Local Development Plan (2012) are relevant to the assessment:

- 28 – Sustainable Design
- 29 – Design Quality and Place-Making
- 36 – Development in the Wider Countryside
- 49 – Coastal Development
- 50 - Aquaculture
- 57 – Natural, Built and Cultural Heritage
- 58 – Protected Species
- 59 – Other Important Species

- 60 – Other Important Habitats
- 61 – Landscape
- 63 – Water environment

## 8.0 Other Material Policy Considerations

### Scotland's National Marine Plan (2015)

8.1 Three policy strands of the National Marine Plan are relevant to this application. Firstly, there is a strand which seeks to develop an aquaculture industry which is “sustainable, diverse, competitive, economically viable and which contributes to food security whilst minimising environmental impact.” The plan supports the industry’s target to grow marine finfish production sustainably to [*an annual level of*] 210,000 tonnes “with due regard to the marine environment and carrying capacity”. Another (in this case competing) strand in the plan seeks to protect and enhance the unique natural resources of Scotland which attract visitors and which are relied upon for recreational activities. It also supports continued and improved access to marine and coastal resources for tourism activities and recreational use. A third relevant strand is that the plan supports the sustainable development of harbours to maximise their capacity and support other sectors. Relevant policies in the plan are:

- GEN 1 – General planning principle
- GEN 2 – Economic benefit
- GEN 3 - Social benefit
- GEN 7 – Landscape/seascape
- GEN 9 – Natural Heritage
- GEN 11 – Marine Litter

- AQUACULTURE 3 [*nutrient enhancement and benthic impact*]
- AQUACULTURE 5 [*seascape, landscape and visual amenity*]
- AQUACULTURE 7 [*risk-based approach in relation to wild fish*]
- AQUACULTURE 9 [*emergency response plans*]
- AQUACULTURE 10 [*pre-application discussion and consultation*]
- AQUACULTURE 11 [*gear fit for purpose*]
- AQUACULTURE 14 [*maximising community benefit from aquaculture*]

WILD FISH 1 [*consideration of impact on diadromous fish species*]

REC AND TOURISM 2 [*consideration of impacts on recreation and tourism*]

TRANSPORT 7 [*support for harbour development*]

8.2 The principle of sustainable development and consideration of other coastal and marine interests is one of the key themes of the National Marine Plan. In the context of the Loch Pooltiel application there is an element of tension between the plan’s objective of supporting the general expansion of finfish farming and its objective of protecting the natural resources which attract



visitors. However, the plan's objective of supporting the sustainable development of harbours would be realised locally if the proposed fish farm delivers (or helps to deliver) improvements to facilities at Meanish pier which benefit other users.

### **Scottish Planning Policy (2014) (SPP)**

- 8.3 **Scottish Planning Policy (2014)**, like the National Marine Plan, supports the fish farming industry's 2020 growth target provided this is achieved sustainably. It sees the role of the planning system as being to guide development to coastal locations which best suit the industry's needs with due regard to the marine environment. To achieve sustainability SPP sets out a range of factors which should be considered when assessing specific proposals. These include economic benefits, landscape and visual impact, biological carrying capacity, and interaction with other users of the marine environment. SPP also states that the planning system should promote a pattern of development which is appropriate to the character of the particular rural area and the challenges it faces.
- 8.4 In remote and fragile areas and island areas outwith defined small towns, SPP states that "the emphasis should be on maintaining and growing communities by encouraging development which provides suitable sustainable economic activity, while preserving important environmental assets such as landscape and wildlife habitats that underpin continuing tourism visits and quality of place". In the context of the Loch Pooltiel application, the proposed fish farm would help to broaden the base of the local, tourism-dependent economy by generating some additional year-round employment directly on the farm and indirectly via support services. However, it could not be argued that the development would preserve important landscape or wildlife habitats. It would impact on these at a localised level.

### **Highland Coastal Development Strategy (2010) (HCDS)**

- 8.5 The coastline adjacent to the proposed fish farm site is on the boundary between an area classified as "Isolated" (the An Ceannaich headland) and "Undeveloped" (the croft land and low-density settlement of Lower Milovaig, Glendale etc). The current SPP does not include policy statements for these coastal categories but the general sensitivity of "Isolated" coast has been acknowledged in previous Scottish Government documents. Within the HCDS the Council's strategy for the West Coast "*supports the development of aquaculture which is compatible with other coastal interests, tailored to the potential and sensitivities of respective sites and at a scale which is within the visual and biological carrying capacity of the areas concerned*".
- 8.6 Given the responses of the statutory consultees to the current proposal, and looking at the proposal in very broad terms, the Loch Pooltiel fish farm proposal could be considered broadly consistent with the strategy. But there are provisos to this. It would be compatible with most coastal interests in this part of Skye, but not all. The revised proposal has been tailored to some of the local amenity sensitivities, but not all, and *not enough* as suggested by

some interests. As far as the regulatory bodies are concerned, the scale of the proposed fish farm would appear to be within the visual and biological carrying capacity of the area concerned. But to certain specific groups - the owners of neighbouring properties in Lower Milovaig, the local dive charter company which takes some of its clients to Meanish Reef and partly relies on it as a poor-weather diving option, the angling and riparian interests who see the proposal as presenting an unacceptable risk to wild salmonids in the small river nearby, and the RSPB, which envisages a protected bird interest being displaced - the proposed development is *not* within the carrying capacity of the area concerned. The role of the Council as Planning Authority in making a recommendation on this proposal is deciding how much weight is given to these competing arguments.

## **9.0 Planning Appraisal**

9.1 Section 25 of the Town and Country Planning (Scotland) Act 1997 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. The Development Plan in this case comprises the Highland-wide Local Development Plan.

9.2 The determining issues are:

- do the proposals accord with the development plan?
- if they do accord, are there any compelling reasons for not approving them?
- if they do not accord, are there any compelling reasons for approving them?

9.3 In order to address the determining issues, the relevant planning considerations are (a) development plan policy, (b) the principle of development, and (c) the issues raised during consultation and listed at paragraphs 5.3 and 5.4 above.

### **Development Plan Policy**

9.4 Policy 50 (Aquaculture) within the Highland-wide Local Development Plan (HwLDP) states that the Council will support the sustainable development of finfish and shellfish farming subject to there being no significant adverse effect, directly, indirectly or cumulatively on the natural, built and cultural heritage and existing activity. Of the statutory consultees, only the Skye District Salmon Fishery Board envisages a significant adverse effect from the proposed fish farm which they believe merits refusal. However, SNH's main concern nowadays is natural heritage interests at national level only and Marine Scotland Science rarely objects to fish farm development proposals unless they are technically unsound or compromise fish disease management arrangements.

9.5 The proposed fish farm site lies within the North West Skye Special Landscape Area which has the status of a local/regional heritage feature in the Council's development plan (Policy 57). The policy test is a presumption in favour "*if it can be satisfactorily demonstrated that the development will not have an unacceptable impact on*" the particular heritage feature(s)." From a

broad planning perspective this would appear to be the case, though the objectors would disagree (see detailed discussion of landscape aspects below).

- 9.6 This part of Skye lies within a Fragile Area as referenced in Policy 36. This policy requires consideration of *the extent to which the proposal “would help, if at all, to support communities ... in maintaining their population and services ...”*. Comments of support which were received for the current and the superseded KFF proposal are relevant here, particularly in relation to the permanent jobs which would be created and the prospect of some facilities at Meanish Pier being improved for other users.

### **Principle of Development**

- 9.7 A small fish farm operated in the inner loch between 1989 and 2005. Fish farming has however moved on, more exposed sites are now feasible, and to be economically viable larger, more automated installations in better-flushed sites are now required. The applicant clearly believes the proposed site in the outer reaches of Loch Pooltiel is technically suitable for a new fish farm, SEPA regards the likely impact on seabed and water column as acceptable, and MSS regards the proposed installation and farm management arrangements as fit for purpose “as far as can be reasonably foreseen”. Furthermore, SNH does not believe the integrity or qualities of the landscape character in this area would be significantly compromised by the proposed development. Nor does it believe that the fish farm would do significant harm to wildlife provided it is properly managed. There is however no local planning history for development of such an installation in the outer part of Loch Pooltiel and there remains the question of impact on the amenity of Lower Milovaig.
- 9.8 Lower Milovaig is a small township, at the outer edge of the populated area of Glendale and at one of the north-westerly extremities of the island of Skye. It has an outlook over wild and unspoilt coastal scenery and can boast closer views of the Western Isles across the Minch. Its small number of inhabitants enjoy the particular environmental qualities and business potential and the owners of tourist accommodation here market their product accordingly. The unspoilt views, tranquillity, wildlife-watching opportunities and dark night skies are central to what they offer their clientele. The first three of these elements at least could all be compromised to a certain extent by development of the proposed fish farm on Lower Milovaig’s doorstep. This is a localised consideration because the impact would not be felt to anything like the same extent by residents and accommodation providers in other parts of the Glendale area more distant from the proposed fish farm site. The essential question is whether or not the residents and house owners in Lower Milovaig should be forced to accept potentially negative impacts on their amenity and earnings in order to allow the establishment of a fish farm which may or may not deliver more net community benefit.

## **Economic Development**

- 9.9 Prospects for the fish farming industry are currently good due to steady public demand for farmed salmon and trout and a growing export market. It is against this backdrop, and with several years of previous fish farming experience in north-west Skye behind it, that KFF has put forward its development proposal in Loch Pooltiel. KFF expects the fish farm to directly generate 4 new full-time jobs and 2 part-time jobs, mostly within the local community (howsoever defined). The development would also generate work and income for contractors, both locally and elsewhere in Scotland, eg for repairs and maintenance, well-boat services and feed delivery, and processing and packaging of the harvested fish.

## **Landscape character and visual amenity**

- 9.10 The site falls within the North West Skye Special Landscape Area (SLA) which extends from the tip of the Waternish peninsula in the north to Loch Brittle in the south. The citation for this designation describes it thus:

*A coastal landscape of dramatic cliffs, and headlands, isolated bays, and intimate beaches contrasts with a stepped moorland interior which often has distinctive hills shaped by their volcanic origins. The complex interplay of land and sea provides an ever-changing sequence of views, many of which extend outwards across the full width of the Minch.*

- 9.11 Relevant special qualities include:

- extensive, unbroken stretches of coastline accessible only by boat or on foot;
- diverse seascape character seen as an ever-changing sequence from the meandering coastal roads, tracks and footpaths;
- a sequence of dramatic peninsulas separated by deep penetrating sea lochs and large-scale complex bays;
- crofting landscapes with a sense of remoteness and tranquillity

- 9.12 The citation lists various sensitivities to change. Three of these are relevant to this application:

- *coastal and marine development which would introduce any incongruous man-made elements into views over open water or from shore to shore across bays and inlets.*
- *Further large-scale structures which would significantly increase the incidences of such features intruding on coastal and mountain views.*
- *Additional prominent visual features within the moorland landscape which would compromise the simplicity of the existing landscape quality.*

- 9.13 The regular geometric shapes and horizontal orientation of the proposed fish farm cages would contrast with the rugged coastal cliffs adjacent and this

seems most apparent in the photomontage prepared for viewpoint 7, the view southwest across the loch from Eas Aboist on the uninhabited north side [see *Diagrams 7 and 8*]. However, there is a regularity of landform in the coast also – a regularity of line and a steady increase in cliff height from east to west on the south side of the loch – which mutes this contrast. The fish farm appears as an obvious addition to the landscape but not necessarily one which is detrimental. If anything, the photomontage tends to exaggerate the likely visual impact from this particular angle, whereas from the other viewpoints explored in the EIA the fish farm appears either as a more distant, small-scale feature in the landscape, or it is seen in the context of a managed crofting landscape with other man-made structures (eg houses, roads/tracks, fences) round about. The photomontages based on seaward views also tend, if anything, to exaggerate the relative visual impact of the fish farm because a key distant feature of the views here on most days – the long profile of the Western Isles – is lost in haze in the photos. [see *Diagrams 9 to 13*]

9.14 SNH advised as follows:

*The fish farm would be inferior in scale to the sea, especially as the new site is further out towards open water. The low, linear layout of the fish farm is compatible with the horizontal emphasis of the landscape. The height of the structures will be clearly inferior to the coastal cliffs nearby. It will align well with the adjacent coastline in most views. The location, well over to one side of Loch Pooltiel, means that it does not block the visual movement out to sea.*

*The immense vertical cliffs south of Biod an Athair exhibit a strong sense of ruggedness and naturalness which contribute to a sense of localised wildness in that area. However the fish farm is associated with the settled southern shore of Loch Pooltiel and is unlikely to compromise those attributes.*

On the basis of this response, that the proposal only forms a small component in the wider landscape, it is considered that the landscape impact is acceptable.

9.15 SNH also notes that the revised fish farm location appears to have reduced the visual impact of the proposals from the majority of viewpoints on the south side of the loch. The feature of the Loch Pooltiel landscape which most draws the eye at Lower Milovaig is the dramatic north-south line of cliffs on the opposite (north) side of the loch, which SNH mentions above. Complete with waterfalls, this impressive line of cliffs rises to a height of more than 300m at Biod an Athair. In the previous (withdrawn) KFF proposal the fish farm would have intruded significantly on the foreground of that view from Lower Milovaig. However, in the current revised application that is no longer the case. If the fish farm is seen as intruding on the seaward view now, as it may from the highest houses overlooking the site, it is a relatively smaller part of a much wider and more distant sea view – the view to the Western Isles on the horizon. This means a lesser impact. The clifftop walk to the west of Lower Milovaig would have the fish farm as significant foreground feature for part of

its distance. That would be unwelcome for some but for others it would be a feature of interest. Either way, this impact would recede as height is gained towards the summit of An Ceannaich headland.

- 9.16 Notwithstanding the above, the proposed fish farm would undoubtedly introduce an “alien” element to some of the views across the mouth of Loch Pooltiel and this change is at the nub of local complaints that the fish farm would spoil the pristine landscape character of the outer part of the loch. This message comes especially strongly from residents and visitors who see this as a special and unique place, particularly good for sunsets and observing the night sky, and who value its wilderness quality. In moving the fish farm site westward, and by pulling it closer in to the shore and below the cliff line, the applicant has sought to mitigate its disruptive effect. From the point of view of those locally who do not want to see a fish farm from their property at all, this mitigation is not enough. But suggestions that the fish farm would become “a dominant feature of the views throughout Glendale”, “massively detrimental” to the area’s natural beauty, “totally ruin” its current sense of peace and tranquillity, or turn Glendale into a “loud, ugly industrial site” seem overstated.
- 9.17 In practice, few households should be able to see this fish farm at close quarters and of those which do, only a fraction should be able to see the fish farm in its entirety. The houses closest to the proposed site, below the line of the Lower Milovaig spur road, should not be able to see any of the fish farm cages directly, or the feed barge, because they will be out of sight below the cliffs. Houses sitting along this road on its uphill side will probably only see the northeast-most cage. Houses on the higher ground at Lower Milovaig, on either side of the loop road, will see more – probably half to two-thirds of the cage group if the house sits on the south side of that road, the whole cage group only from houses on the high spur inside the loop – but these views will be from further away (about 800m). For most of the houses in the Glendale area, around the inner part of Loch Pooltiel, the fish farm would be invisible or a relatively minor, distant feature.
- 9.18 If planning permission was to be granted, further mitigation of the visual impacts could be achieved via the inclusion of a planning condition requiring all surface equipment on the fish farm to be a matt grey colour with the exception of safety equipment. The applicant has already indicated a willingness to do this in the Environmental Statement (p93). Another condition could require all working lights to be directed downward by shielding and specify that infra red lights and cameras are used if any lighting is required for security purposes overnight.
- 9.19 Concerns expressed by some objectors that the limited number of navigational warning lights specified by the Northern Lighthouse Board would cause significant light pollution have not been borne out at any existing fish farm sites elsewhere in Highland. Only three such lights are involved, they are point-source and relatively low-wattage, and they have quite a limited visible range. The highest navigation light would be on top of the feed barge and that is the part of the fish farm tucked closest under the cliff. Suitably marked, as the NLB

has indicated, the proposed fish farm should not present a hazard to navigation as some objectors have suggested. No objections to the proposal were received from navigational, yachting or commercial fishing interests.

## **Noise**

- 9.20 Tranquillity is seen by local residents as one of the most important attributes of the Lower Milovaig area and a number of objectors have expressed concern that this quality will be lost or significantly compromised by the presence of a fish farm nearby. There is a fear that despite the applicant's claims of minimal noise pollution from the feed barge, a constant hum will be produced, and when this happens in an area which is virtually silent it could be annoying for both local residents and visitors. They are also concerned at the possibility of noise from portable machines which may be used on the fish farm, eg compressors, portable generators, power tools, or radios.
- 9.21 In the EIA scoping opinion issued by the Council in May 2013 the applicant was asked to provide within the LVIA "an assessment of the noise impacts of the site from the closest properties to the site." The scoping opinion also stated that the phrase "minimal noise" should be quantified. The noise assessment subsequently provided by the applicant is very basic and does not attempt to estimate the sound levels which might be heard on neighbouring properties. It states that the noise from the single generator on the feed barge would be less than 35dB on the deck because the generator would be enclosed by an insulated canopy in an insulated room which would be underwater. This is equivalent to the noise level typically experienced in a library and would likely be attenuated to a negligible level over the 700m distance to the nearest residential property.
- 9.22 The sound of feed pellets being blown through the feed pipes (normally a gentle swishing sound) may occur on and off for up to 8 hours per day during the normal working week and for up to 6 hours a day at weekends. The applicant's assessment indicates that this sound would be at a level of less than 50 dB (similar to that of a dishwasher in the next room) if measured 50m from the feed barge. Experience then suggests that attenuation to a negligible level would be likely within the range of the nearest house, particularly given the buffering which may be provided by the nearby cliffs. However a definitive statement could not be made on this without a test run.
- 9.23 The applicant accepts that portable machines would be used as temporary power sources on occasion. However, on the basis of the company's experience with its other fish farm sites, these are generally not audible from residential properties more than 500m away.
- 9.24 Several objectors have pointed out that sound travels further over water and they expect the nearby cliffs to have an amplifying effect on noise from the fish farm. As an example, one local resident claimed to have heard the waterfall splashing into the sea on the far side of the loch when it was in spate (presumably on a still day). Another said the sound of human voices on the

pier could sometimes be heard 700m away. Given the configuration of the coast here, it is conceivable that such effects may work both ways, eg the cliffs might reflect noise from the fish farm back out to sea. However, such local effects could only be verified with a detailed independent noise assessment over a period of time covering periods of both stormy and calm weather.

- 9.25 In the absence of such an assessment, control of the noise output of the fish farm could be exercised by the use of a standard condition which sets a tight limit on the noise level which the development could generate as measured at the nearest residential properties.

### **Impact on wildlife and local wildlife-watching opportunities**

- 9.26 Another key attribute of this area is the habitat or feeding ground which it provides for coastal and marine wildlife and the opportunities it therefore provides for wildlife-watching. One aspect of this, only recently notified to the Council, is the proximity of sites used by protected bird species mentioned above in sections 5 and 6 of this report. Another aspect is Loch Pooltiel's reputation as one of the places where there is the best chance of seeing basking sharks or minke whales from the shore, as well as the opportunity to see dolphins, harbour porpoises and seals. This may arise partly because of Loch Pooltiel's proximity to the narrowest point of the Minch and partly because of hydrographic and biogeographic factors. There is more than just nature conservation at stake here. This type of wildlife resource is increasingly recognised as having real economic value because it helps to attract tourists to this remote area, and if they are lucky with their sightings, it helps to attract repeat visits.
- 9.27 Whilst RSPB has objected to the planning application on the grounds of the nearby protected bird interest, SNH has not because (a) it is uncertain how the birds would respond to the fish farm once operational, and (b) even if it caused them to leave the area the favourable conservation status of the regional population of these birds would be unaffected.
- 9.28 Both RSPB and SNH are agreed however that any grant of planning permission for the fish farm should include a condition which restricts the construction phase to the months outwith the birds' breeding season (ie outwith February to August). In addition SNH advises that work on constructing the fish farm should not start until 2 hours after sunrise and finish 2 hours before sunset.
- 9.29 The issue of potential displacement, disorientation, or even entanglement of large, iconic marine wildlife which may result from establishment of a fish farm at this location and its use of acoustic deterrent devices (ADD's) to deter seal attacks, is harder to resolve. SNH believes that the predator control arrangements put forward by the applicant follow good practice and they should ensure minimal impact on cetaceans and basking sharks. The company's primary defence would be well-tensioned and maintained nets with ADD's only used if necessary and for the minimum period of time until seal



attacks cease. SNH recognises that ADD use could still displace harbour porpoises and other cetaceans from the vicinity but it thinks major effects are unlikely because of the open nature of the coastline.

### **Potential impact on recreational dive sites**

- 9.30 The local dive charter company, Dive and Sea the Hebrides (DSH), based in Loch Bay, has expressed considerable concern about this application and KFF's previous one because it believes pollution or siltation from the fish farm could have a detrimental effect on two of its regular dive sites - Meanish Reef, which lies just northwest of Meanish pier, and the wreck of the 'Chadwick' which lies at the north end of Oisgill Bay. Like other tourism operators in the northwest of Skye, DSH is conscious that the remoteness of the area puts it at a competitive disadvantage with other more accessible locations in Scotland. It is therefore under extra pressure to offer an attractive package to potential clients, and in the case of DSH that means being able to provide access not only to high quality diving when the weather is good but also to worthwhile sheltered sites when poor weather prevails. Meanish Reef is particularly relevant in the latter regard and it also attracts a wider diving clientele to the area because it can be accessed from the shore and features in a recently published book: "Top 100 British Shore Dives".
- 9.31 To underline the importance of this particular dive site, which it perceives as threatened by the KFF fish farm proposal, DSH commissioned a Seasearch underwater survey of the reef by professional marine biologists in September 2013. One of the authors of the report is quoted recently as saying "moving a fish farm 400m further away will not substantially remove the threat to the Meanish Reef communities." DSH points out that the revised planning application would still place a large fish farm within 550m of one of Skye's most important dive sites and asserts that this would result in the dive site's "total destruction." DSH also points out that an HSE study of underwater noise showed that ADD's in an underwater environment have the potential to damage a diver's hearing.
- 9.32 This however contrasts with the Council's experience of fish farm developments elsewhere in Highland which lie in closer proximity to recognised recreational dive sites, namely the wreck of the "Port Napier" at Kyle of Lochalsh and the wreck of the "Shuna" in the Sound of Mull. In neither instance has the Council received any reports of damage to the dive sites or divers' hearing which can be attributed to the fish farm. In its consultation on the current planning application, the Council asked SEPA specifically to advise whether or not a significant impact would be likely on the two recognised dive sites nearby (Meanish Reef and the wreck of the "Chadwick"). SEPA said that it did not expect the fish farm operation to have any significant impact on these sites. If it were to transpire that subsequent monitoring did reveal a significant impact, SEPA said it could deal with this accordingly.

## **Impacts on wild salmonids and fishing interests**

- 9.33 The Hamara River, which might more accurately be described as a burn, runs through the middle of Glendale village and flows into Loch Pooltiel less than 3 kms from the proposed fish farm site. This makes it inherently vulnerable and it is recognised as one of only 12 rivers on Skye which naturally would support a significant population of wild salmon and sea trout. However, given its small size, exposure, and the presence today of many houses close by along much of its length, its inherent value as a fishery is likely to be low. The nearest river system with a significant economic value as a sport fishery is the River Snizort, the mouth of which is 25 kms away.
- 9.34 The Skye District Salmon Fishery Board's main concern is the increased risk of sea lice infestation and mass fish farm escapes which could arise from the continuing expansion of salmon farming in north-west Skye. The exposure of the proposed fish farm site in Loch Pooltiel is particularly a concern because it could make escapes due to storm damage more likely. Marine Scotland Science has however checked carefully the robustness of the proposed fish farm equipment for the site in question, the containment and escapes contingency plan, and the arrangements for management of sea lice. It has concluded that these are "satisfactory as far as can reasonably be foreseen". Provided these arrangements match expectations, it would seem reasonable to assume that there should not be any significant adverse effect on wild fish populations.
- 9.35 The company states that it "would be" a signatory to the Area Management Agreement between fish farming companies and wild fish interests in the area in order to promote and maintain healthy stocks of both wild and farmed fish, and to protect the natural environment. This assurance is welcome. However, there is no up-to-date Area Management Agreement for Skye at present (it was due for review more than 3 years ago). For some fish farm proposals near to important wild fisheries the Council has made the preparation of a detailed Environmental Management Plan a condition of planning consent. However, given the comments made by Marine Scotland in this case this does not seem warranted on this occasion.
- 9.36 Glendale Estate Management Committee has objected to the proposed fish farm partly because it claims to own the coastal fishing rights in this area (most of the Duirinish coast) – presumably for salmon and sea trout – which it purchased from the Crown Estate over 20 years ago. The management committee asserts that the fish farm would interfere with and obstruct public navigation rights as defined in the disposition granted by the Crown Estate. This may relate to a right to establish a coastal netting station for wild salmon and sea trout. The Northern Lighthouse Board has not raised any concerns about navigational safety other than to recommend its standard marking and lighting arrangements for the fish farm. The competent body to deal with rights to navigation is Marine Scotland which would assess this as part of the fish farm company's application for a marine license.

## Site exposure

- 9.37 A number of representations referred to the exposed position of the proposed fish farm site, which is completely open to winds from the west and north, and the attendant risk of storm damage and escapes, eg:

*“The peak gust winds at Milovaig will typically reach over 100mph on an annual basis, and have been known to cause significant damage. The Google aerial view currently shows the destroyed house at No 16 Lower Milovaig, which was a house approaching completion, destroyed in the January 2005 storms. Static Caravans have been overturned and destroyed on a number of occasions in recent memory.”*

*“There would inevitably be some escapes from the farm, possibly several if the regular adverse weather conditions (particularly the autumn and winter gales) were to damage the cages or slacken the net tension. These gales can last up to 3 months on and off, and gusts of 134mph were recorded. Again the landscape magnified the effect of these winds creating wind tunnels with a cyclone-like effect causing considerable damage.”*

- 9.38 The applicant seems confident however that the proposed equipment and its regime of regular inspection and maintenance is up to the task. Marine Scotland Science has reviewed the equipment specifications and gear attestations in considering the adequacy of containment arrangements. Its independent view is that the equipment is “satisfactory as far as can reasonably be foreseen”. This is with the proviso that the environmental data supplied with the application is accurate. However some objectors have taken issue with this, eg:

*“...the weather data presented within the EIA uses Carbost as a proxy. The average wind speed of this weather station is less than 60% of those measured in Lower Milovaig.”*

*“the potential for structural damage to the pens and nets is considerable, no matter the anecdotal claims made by Kames Fish Farms as to the suitability of the pens... the applicant has not demonstrated that the integrity of the pens can be maintained while taking account of the combination of sub-sea, and above-sea forces at this location. The consequence of this is that it represents an unacceptable risk to the environment, and also an unacceptable risk to health and safety and good fish husbandry.”*

- 9.39 The applicant's managing director seems relaxed about this. Fish farm technology is advancing all the time and he has pointed out that the company has an established site in a more exposed position in Argyll. Council staff have also noted that several recent fish farm developments and proposals by other companies have involved sites with a considerable degree of exposure to

prevailing west and south-westerly winds, eg at outer Loch Kishorn and Loch Sunart. The exposure of the Loch Pooltiel site does not therefore seem to be grounds for a refusal.

### **Impact on Infrastructure**

- 9.40 Some objectors have complained that traffic to and from the proposed fish farm development would invade the privacy and peacefulness of houses nearby. It has also been suggested that this would put further strain on the single-track road which carries a significant amount of traffic to Neist Point (one of Skye's most-visited landmarks). Others are concerned that the area around Meinish pier would become more congested and untidy with use by the fish farm. Against these reservations however there is the realistic prospect of the fish farm helping to generate improvements to the Meanish Pier area which is somewhat run-down at present and has very few facilities. Such improvements could help local fishermen, recreational boating interests, visiting divers, the local dive charter company and local tourism generally.
- 9.41 Traffic flow along the single-track road to Meanish Pier and local boat movements would undoubtedly increase if the fish farm is established. However, this should not be too significant because (a) the automated feed barge offshore would provide for immediate staff needs on the fish farm, and (b) the major movements of equipment, feed and stock would be done direct by sea from further afield using well boats and supply boats. No issues have been raised by transport interests.
- 9.42 A key attraction of the proposed development is the stimulus it would give for harbour improvements at Meanish pier. In an e-mail of 28 July 2015, the Managing Director of KFF wrote:
- “There are many elements that we can, and are willing to help [the Glendale Trust] with, should our application be approved. Kames has offered to install 4-5 deep water moorings suitable for visiting yachts, help with the refurbishment of the pier and a floating walkway.... This would allow not only Kames personnel to have easy and safe access at any time/height of tide but also for visiting boats, both big and small.*
- Taking account of the feasibility study and what some of the locals are requesting, we have also offered to help in the refurbishment / repair of the slipway and improvements to the car park. This would help to stimulate more tourists to visit Loch Pooltiel, who in turn would spend money in the community and perhaps open up opportunity for other potential economic enterprise by local business, eg boat trips or bike hire. The direct economic impact of the fish farm, ie full time permanent employment, and the ancillary boost to the local area would help to revitalise this fragile and currently declining community.”*
- 9.43 If planning permission is granted (which could conceivably favour an operator other than KFF if the latter chooses sell the fish farm on) it should be directly

linked to the impetus for pier improvements. A condition could be attached which requires the fish farm company (whosoever that might be) to take an active and constructive part, in consultation with the relevant local bodies, in improving and developing facilities at Meanish Pier which can benefit other users besides the fish farm, in particular moorings for small-to-medium-sized yachts, walkways, improvements to the pier, and improvements to the Glendale Estate shed. Any proposed investment is welcomed but this has to be aligned with the recognition that the pier building is listed and the pier represents its immediate setting. It will be necessary to ensure any works preserve the character of both building and surroundings. Separate planning and listed building application(s) are likely to be required for the use of the pier and any alteration to the listed building which will require the approval of Historic Environment Scotland.

### **Economic cost/benefit of fish farm development v. tourism**

- 9.44 In terms solely of broad environmental acceptability, and despite strong local misgivings, a dispassionate assessment suggests this application is acceptable. The fish farm will have an impact; however it will be a small component in the wider landscape and will not be significantly detrimental may not look great *in situ* but the scenic landscape resource here seems big enough and strong enough to cope with the proposed development.. Noise levels can be addressed by planning conditions. The environmental footprint the fish farm would create on the seabed and its impacts on the water column seem to be within reasonable limits. The dive sites do not seem to be in imminent threat of degradation and if such signs were to show up, SEPA could rein back on the discharge consent. Provision can be made to avoid significant damage to the wildlife here that really matters (though there may still be some local displacement of that wildlife). Arrangements for ensuring that the fish farm stock is properly contained and managed to minimise sea lice problems for the indigenous wild salmon and sea trout seem “satisfactory as far as can reasonably be foreseen.”
- 9.45 Whether or not the proposed fish farm would generate all the jobs the company promises in the Glendale area itself, it would still inject income into the economy of north-west Skye on an all-year-round basis and help to support some local businesses. The promised improvements to the Meanish Pier area would be a fillip for Glendale generally, potentially attracting more yachts and other recreational boat traffic. This could have spin-offs for all the local tourism businesses. Local fishermen, downstream fish processing businesses and specialist aquaculture support services in other parts of Highland could benefit also. The negative impacts on tourist custom which some property owners in Lower Milovaig anticipate are considered to be overstated.
- 9.46 Many of the objectors compare the potential economic benefits of the proposed fish farm unfavourably with those generated locally by tourism. But it is not considered that significant numbers of repeat visitors or potential visitors would stay away from the Glendale area if there was a fish farm near the mouth of Loch Pooltiel.

9.47 Some objectors are entitled to assert that they have an emotional investment in and strong personal attachment to this area as it is at present, whereas the fish farm company's interest is primarily financial, more remote, and likely to be transient. But all ownership is transient and the transformative influence of a fish farm at this location, whether run by Kames or some other subsequent operator, could be contained within reasonable limits and may be used to help upgrade infrastructure which will benefit the local community in the longer term.

## **10.0 Conclusion**

10.1 This application has aroused considerable public interest as evidenced by the number of representations received. In reaching a view on this planning application all relevant planning policies and guidance have been considered, along with the applicant's supporting information, consultee responses and public comments. In light of the considerations above, and assuming incorporation of the various mitigation measures and safeguards suggested in this report, the proposal may be regarded as broadly in accordance with the terms of the Highland-wide Local Development Plan.

## **11.0 Recommendation**

It is recommended that the application is GRANTED subject to the following conditions:

1. All surface equipment, with the exception of navigational markers and safety equipment, shall be finished in a dark matt neutral colour unless alternative finishes are agreed in advance in writing with the Planning Authority. In particular, the top nets and netting along walkways shall be matt grey. Pipes between the automated feed barge and the cages shall be neatly bundled to minimise clutter and routed below water where it is practical to do so.

*Reason: to minimise the visual impact of the installation and to help safeguard the integrity of the North West Skye Special Landscape Area.*

2. All lighting above the water surface and not required for safe navigation purposes shall be directed downwards by shielding. It should be extinguished when not required for the purpose for which it has been installed. If lighting is required for security purposes, infra red lights and cameras should be used.

*Reason: to minimise the visual impact of the installation; to ensure that lights left on in the daytime do not draw the eye towards the site and at night do not present unnecessary sources of light pollution.*

3. Construction of the fish farm shall take place outwith times which are sensitive for birds in this area (ie outwith the breeding season February to August and avoiding the roosting period within two hours of sunrise or sunset). To this end, the applicant should seek advice from RSPB and SNH and follow their guidance in this respect.

*Reason: to safeguard the protected bird interest in this area.*

4. In the event of equipment falling into disrepair or becoming damaged, adrift, stranded, abandoned or sunk in such a manner as to cause an obstruction or danger to navigation, the site operator shall carry out or make suitable arrangements for the carrying out of all measures necessary for lighting, buoys, raising, repairing, moving or destroying, as appropriate, the whole or any part of the equipment so as to remove the obstruction or danger to navigation.

*Reason: in the interests of amenity and navigational safety*

5. At least three months prior to cessation of use of the site for fish farming, a scheme for the decommissioning and removal of all equipment shall be submitted to and agreed in writing with the Planning Authority. Upon cessation the approved scheme shall be implemented.

*Reason: to ensure that decommissioning of the site takes place in an orderly manner and to ensure proper storage and disposal of redundant equipment in the interest of amenity and navigational safety.*

6. All plant, machinery and equipment associated with ventilation, compressors, blowers, air-conditioning, heating and refrigeration services or similar and including fans, ducting and external openings shall be so installed, maintained and operated such that any associated operating noise does not exceed noise standard NR 20 when measured or calculated within any noise sensitive premises with windows open for ventilation purposes.

*Reason: to protect the amenity of nearby houses and to avoid noise nuisance*

7. No development shall commence until a scheme, including timescales for implementation, for the improvement and/or re-development of the facilities at Meanish Pier has been submitted to, and approved in writing by, the Planning Authority. Such scheme shall include details of:

- Proposed consultation with the Glendale Trust and users of the pier
- Proposals for the establishment of new moorings
- Improvements to the existing pier
- Improvements to the Glendale Estate Shed
- On-going maintenance and aftercare

The scheme shall be implemented in accordance with approved details and timescales.

*Reason: In the interest of securing improvements to and around Meanish Pier to enable the applicant's operation to coexist with other users as set out within the application.*

Signature: Malcolm MacLeod

Designation: Head of Planning and Building Standards

Author: Colin Wishart, Principal Planner, Coastal Planning Team

Date: 15 October 2015

Appendices: A: Maps and drawings – location, site layout, barge design;  
B: Photographs and photomontages;  
C: List of Representations



# Appendix A: Maps

Diagram 1: Location of proposed fish farm



Diagram 2: Current v. previous proposal

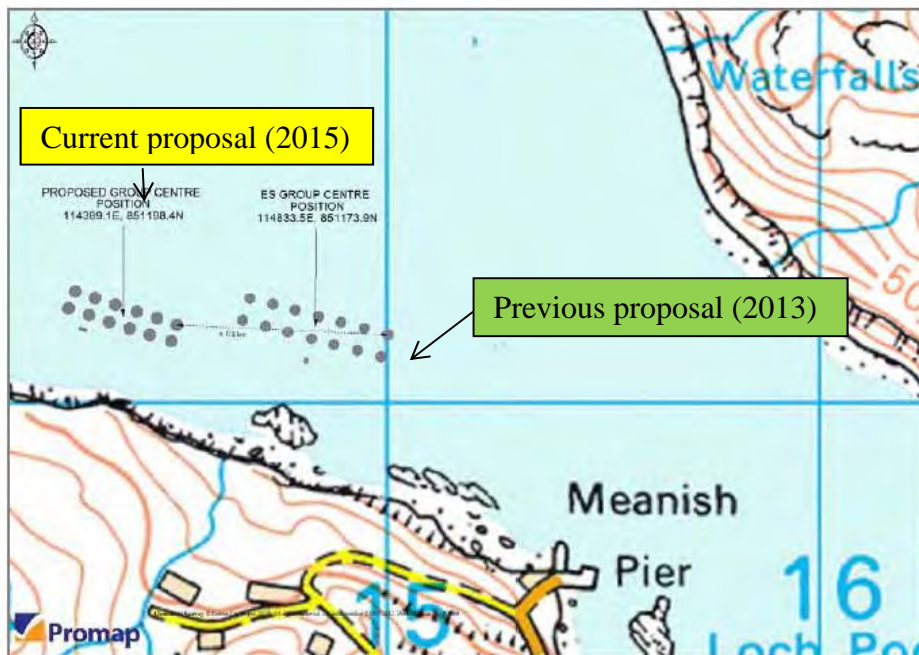


Diagram 3: Location of currently proposed fish farm in relation to Lower Milovaig



Diagram 4: Proposed site layout

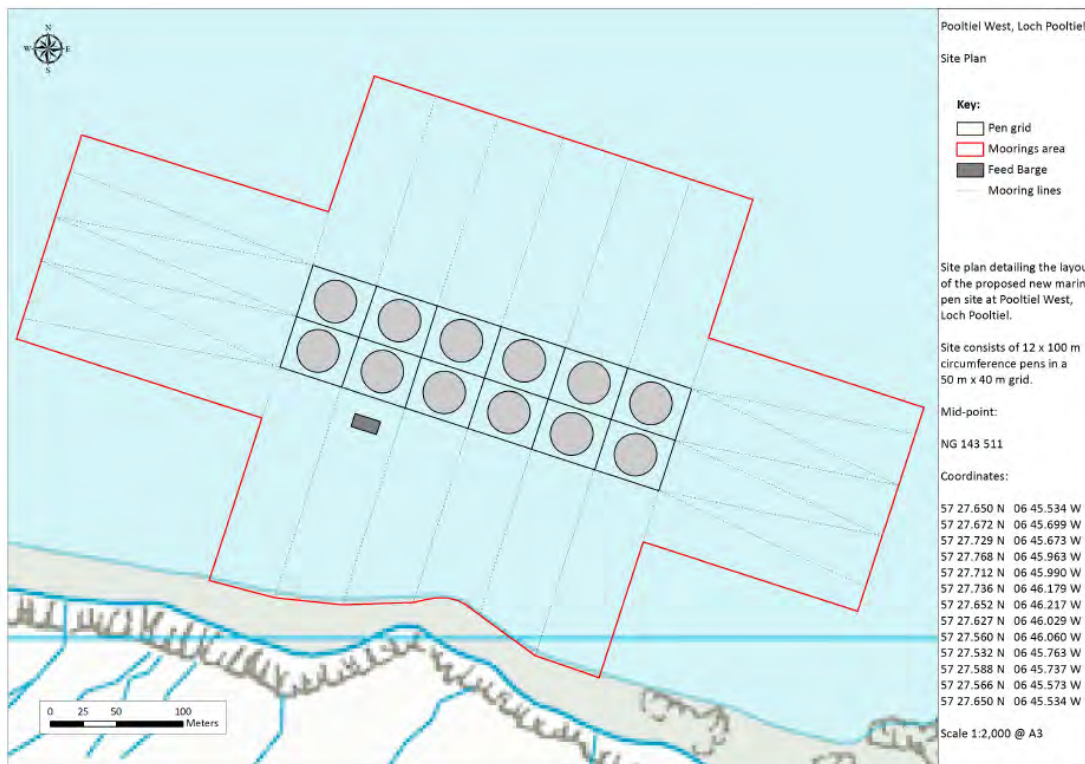
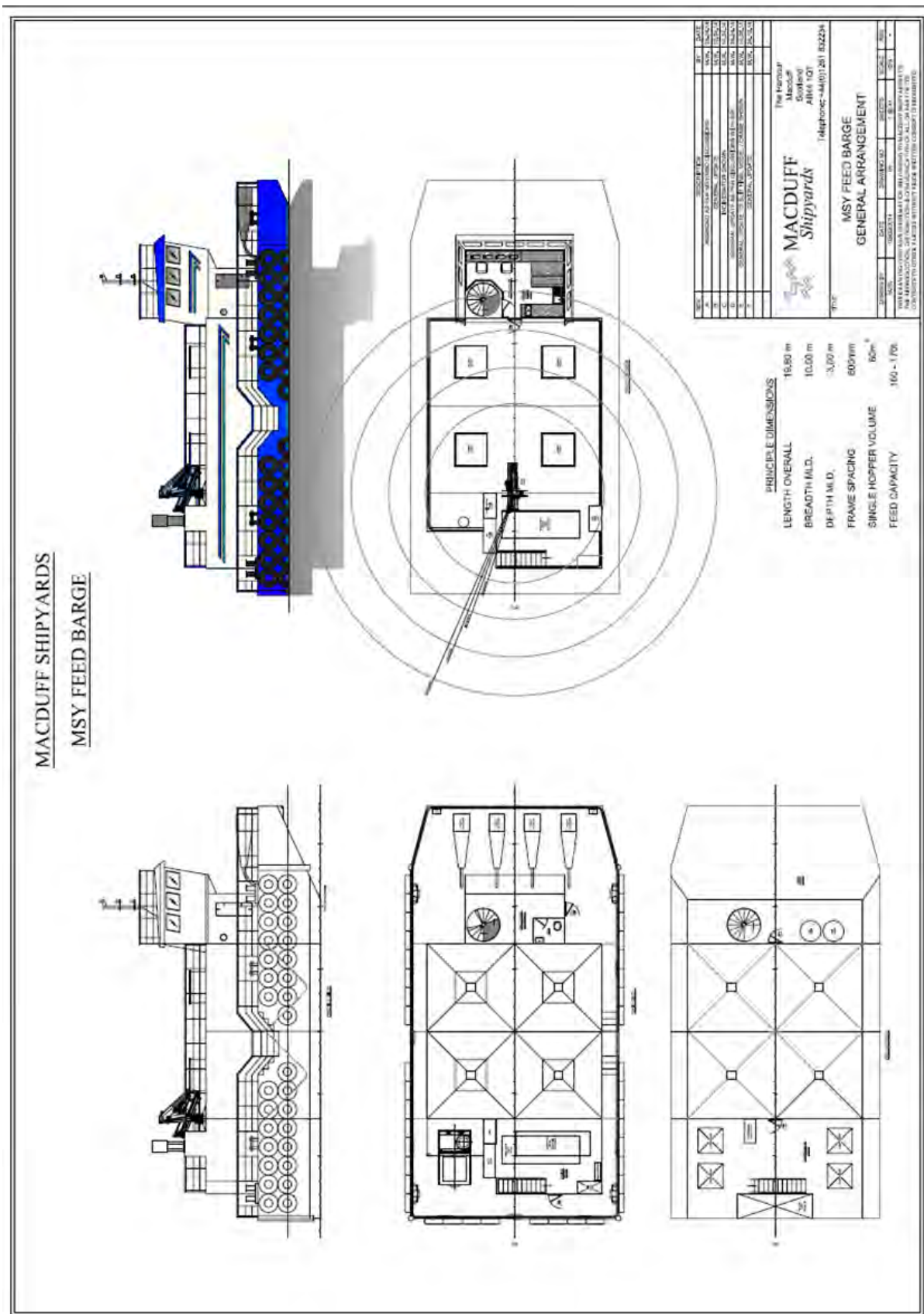




Diagram 5: Design & dimensions of proposed feed barge



## Appendix B: Photographs and photomontages

Diagram 6: Photographic example of proposed feed barge design



Diagram 7: Viewpoints used for photomontages in the LVIA (Landscape and Visual Impact Assessment)

(Erratum: The symbol for VP 8 is in the wrong place on this map. VP 8 was in fact the summit of Biod an Athair (the high point at 313m above sea level on the cliffs adjacent) and a photomontage was subsequently supplied for that position)

Appendix G: LVIA Figures

Eight views were requested by The Highland Council from land surrounding the proposed site. To these eight IFF has added three further views from RCA-HMS & HS sites. The photographs were taken with regard to the visualisation standards for wind energy developments<sup>(1)</sup>. The locations from which the photographs were taken are shown in Figure A and the coordinates provided in Table A. The base photographs and photomontages for these views are provided in Figures C to M.



Figure A: Viewpoints from which photomontage photographs were taken



Diagram 8: Photomontage of the proposed fish farm from viewpoint 7 (Eas Aboist)



<b>Viewpoint 7: View from East Aboist</b>	Grid Ref: 115800 851700	Distance to edge of nearest fish pen: 1.4 km	AOD: c. 85 m	View Direction: WSW (247 degrees from Grid N)
<b>Viewing Instructions</b>				
This image should be viewed with both eyes from a distance of approximately 500 mm.				

Proposed Pooltie West Fish Pen Site  
Landscape and Visual Appraisal  
Figure I2. Photomontage

Diagram 9: Photomontage from viewpoint 3 (Feriniquarrie Road)



<b>Viewpoint 3: View from Feriniquarrie Road</b>	Grid Ref: 117788 850314	Distance to edge of nearest fish pen: 3.4 km	AOD: c. 88 m	View Direction: WNW (288 degrees from Grid N)
<b>Viewing Instructions</b>				
This image should be viewed with both eyes from a distance of approximately 500 mm.				

Proposed Pooltie West Fish Pen Site  
Landscape and Visual Appraisal  
Figure E2. Photomontage

Diagram 10: Photomontage from viewpoint 6 (high ground at Lower Milovaig)



Proposed Pooltie West Fish Pen Site  
Landscape and Visual Appraisal  
Figure H2. Photomontage

Diagram 11: Photomontage from viewpoint 9 (high ground at Lower Milovaig)



Proposed Pooltie West Fish Pen Site  
Landscape and Visual Appraisal  
Figure K2. Photomontage

Diagram 12: Photomontage from viewpoint 4 (branch road at Lower Milovaig)



Viewpoint 4: View from Lower Milovaig	Grid Ref: 114506 850491	Distance to edge of nearest fish pen: 0.64 km	AOD: c. 49 m	View Direction: NBW (350 degrees from Grid N)
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Proposed Pooltiet West Fish Pen Site  
Landscape and Visual Appraisal  
Figure F2: Photomontage

Diagram 13: Photomontage from viewpoint 1 (Meanish Pier)



Viewpoint 1: View from North of Meanish Pier	Grid Ref: 115366 850634	Distance to edge of nearest fish pen: 0.99 km	AOD: c. 0 m	View Direction: NBN (299 degrees from Grid N)
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Viewing Instructions

This image should be viewed with both eyes from a distance of approximately 500 mm.

Proposed Pooltiet West Fish Pen Site  
Landscape and Visual Appraisal  
Figure C2: Photomontage



Diagram 14: Applicant's noise assessment and decibel chart  
(extract from KFF's Environmental Statement)

The highest level of sound will occur from a single generator on the feed barge which will be enclosed by an insulated canopy. At 1 m from the generator the sound level will be 80 dB(A). The generator will be located in an insulated room which lies underwater. Standing on the barge deck noise from the generator will be at <35 dB(A) which is the equivalent of noise in a library as indicated in the dB(A) chart below (Figure 14).

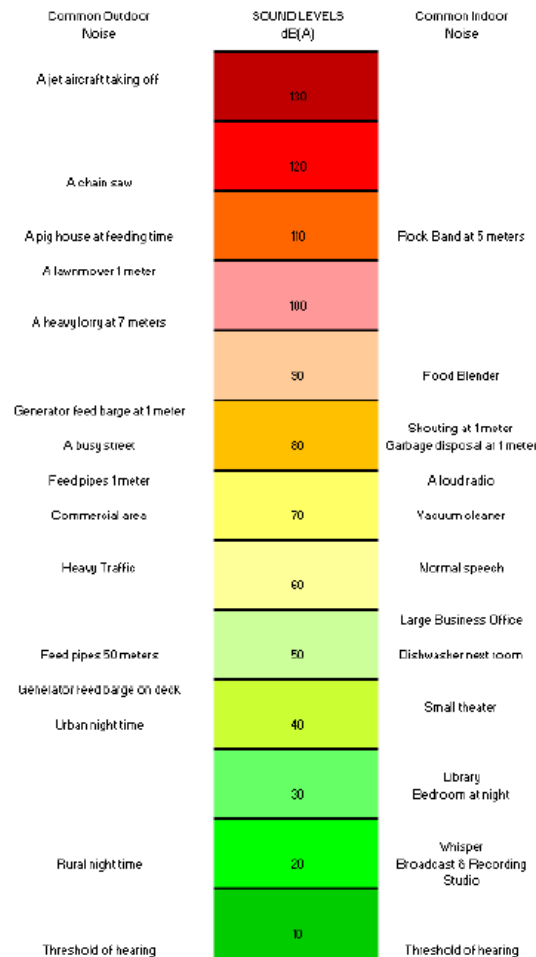


Figure 14. Decibel chart

Some low level noise will be generated from the feed pipes during feeding times. Normal routine feeding will take place within working hours and is estimated to last not more than 8 hours per day during the normal working week and less than 6 hours per day at weekends. At 50 m from the barge the feed pipes will generate sound levels of <50 dB(A) which is similar to that generated by a dishwasher in the next room.

Compressors, portable generators and powerpacks are used as temporary sources of power on occasion throughout the year. As a general rule, these are not audible from residential properties >500 m from KFF's other sites and are restricted to general working hours.

In mitigation, noise from farming operations is predominantly intermittent and is almost entirely confined to daylight hours (normal operating hours 0800 – 1700). Operations outside of these hours are not routine and are only anticipated in occasional and exceptional circumstances. The feed barge will not operate when it is dark as the fish require daylight to feed.