

Agenda Item	6.7
Report No	PLN/084/22

HIGHLAND COUNCIL

Committee: North Planning Applications Committee

Date: 27.09.2022

Report Title: 22/02482/FUL: Mowi Scotland Ltd
Upper Loch Torridon
Shieldaig

Report By: Area Planning Manager - North

Purpose/Executive Summary

Description: Marine Fish Farm - Atlantic Salmon: alteration to install two additional 120m circumference cages

Ward: 05 - Wester Ross, Strathpeffer And Lochalsh

Development category: Local (Non EIA)

Reason referred to Committee: Number of third party objections

All relevant matters have been taken into account when appraising this application. It is considered that the proposal accords with the principles and policies contained within the Development Plan and is acceptable in terms of all other applicable material considerations.

Recommendation

GRANT the application as set out in section 11 of the report

1. PROPOSED DEVELOPMENT

- 1.1 This application seeks permission for the installation and use of two additional 120m circumference pens at an existing fish farm located in Upper Loch Torridon. The existing farm comprises ten 120m circumference pens arranged in two rows of five. The proposal seeks to add two additional pens to the northern end of these rows, thereby extending the existing planning boundary beyond its current extent. The surface area the pens occupy would extend approximately 75m beyond the existing equipment and the mooring area boundary would extend approximately 155m northwards. They also seeks permission for the relocation of the existing work raft to a more central location within the site, within the existing pen configuration.
- 1.2 Other infrastructure is located at or nearby to the site of the proposal in addition to the existing pens and mooring lines to which the proposal intends to attach and extend. This includes a 200T feed barge located alongside the pen configuration and a shore base used to service the site located to the south of the site at Shildaig.
- 1.3 Pre-Application Consultation: No formal pre-application submission. Although the applicant was provided with verbal advice on relevant supporting information to include by planning officers. Planning officers were also made aware of plans being shared with the community council in advance of the application being submitted.
- 1.4 Supporting Information:
- Information to support assessment of visual impact
 - Information to support assessment of noise impacts
 - Details of farm management plans
 - Further information supplied in response to Marine Scotland Science comments and Kinlochewe Community Council comments.
- 1.5 Variations: No variations have been sought since lodging the application.

SITE DESCRIPTION

2.

- 2.1 The fish farm site is on the east side of the hilly peninsula (maximum height 110m) that separates Upper Loch Torridon from Loch Shildaig. It is sheltered from the prevailing westerly winds, and it is also quite close by the narrows and so benefits from good tidal flushing. It is visible at a distance at various points around the upper loch, particularly from Aligin Shuas on the north side and the section of high road above it which runs to and from Diabaig. The proposal would sit approximately 1.3km from its nearest residential neighbours across the loch.
- 2.2 The site lies within the Wester Ross National Scenic Area.

3. PLANNING HISTORY

- 3.1 21.11.2008 08/00581/FULRC - Modification of finfish farm site Approved

(expansion)

- | | | | |
|-----|------------|---|----------|
| 3.2 | 17.03.2011 | 10/03954/FUL - Expansion of fish farm - 128% increase in moorings area and spacing out of existing fish pens. | Approved |
| 3.3 | 29.02.2012 | 11/04695/FUL - Proposed expansion of cage area and reduction of moorings area at salmon farm at Camas an Leim, Loch Torridon | Approved |
| 3.4 | 04.02.2021 | 20/01745/S42 - Section 42 to amend condition 1 of planning permission 11/04695/FUL at Torridon Salmon Farm (removal of 10 year limit) | Approved |

4. PUBLIC PARTICIPATION

4.1 Advertised: Unknown Neighbour

Date Advertised: 08 July 2022

Representation deadline: 22 July 2022

Timeous representations: 8

Late representations: 2

4.2 Material considerations raised are summarised as follows:

Objections:

- Increased use of antifoulant treatment on nets
- Increased vessel movement and general activity associated with the pens and the environmental impact this will have
- Concerns over excessive or increased noise due to operations associated with the additional pens.
- Concerns over light pollution as a result of the navigational marking requirements
- Risk of increased marine litter
- Adverse impact on sea floor
- Negative impacts on tourism

Support:

- The proposal (and existing development) supports local businesses and employees.
- The proposal would have a beneficial impact on fish welfare.

4.3 All letters of representation are available for inspection via the Council's eplanning portal which can be accessed through the internet www.wam.highland.gov.uk/wam.

5. CONSULTATIONS

5.1 Environmental Health Officer - No objection

- The site has previously been the subject of noise complaints.
- Deemed unlikely additional pens will have significant impact on amenity for people in the area.

Following further correspondence with the case officer additional comments were made:

- Confirmed the benefit of previous noise monitoring and resultant mitigation deployed by the applicant which has brought noise levels to acceptable levels.
- Identified that further monitoring could be required by condition but that this would be subject to a decision on the degree to which such a requirement was deemed 'reasonable'.
- Any further noise complaints would be subject to investigation by Environmental Health Officers.

5.2 SEPA – no objection

- The proposal will reduce stocking density and thereby lessen the intensity of deposition on the seabed.
- The proposal is outwith site boundaries for their existing CAR licence and will therefore require a technical variation at which point modelling for the site will be evaluated.

5.3 Wester Ross Salmon Fishery Board – No comment received.

5.4 Marine Scotland Science – No objection

- Benthic Impacts – the increase in footprint will likely result in a decrease in benthic impact per unit area. SEPA CAR licence variation is being sought therefore confirmation should be provided confirming this proposed change is likely acceptable. No modelling has been provided therefore further information is sought confirming this is likely acceptable.
- Water Column – no change to impacts anticipated compared to existing operation of site.
- Stocking Density – the operation of the site will be at an acceptable level of below 22kg/m³. Confirmation of net depth is required.
- Husbandry - Proposal is not expected to impact methods for mortality removal and disposal on site.
- Sea lice – Site is located in Farm Management Area (FMA) M-17 with three other farms within the same FMA operated by another operator.
- Sea lice - Heightened lice counts have occurred at the suite during the previous production cycle however a range of physical and chemical treatments were deployed to keep lice numbers below MS intervention levels.
- Sea lice – sea lice management strategies presented by applicant show a more stringent approach than code of good practice standards. Preventative strategies include a pen by pen interventions rather than whole site and use

of cleaner fish.

- Sea lice – Time taken across various treatment techniques varies with several estimated at 6 days (including the proposed additional pens). “.. there is an increase in pen number proposed which could result in an increase in time taken to perform sea lice treatments and husbandry techniques on site; however, with a switch to targeting individual pens that breach the intervention level, whole farm treatment is less likely and therefore the impact of the additional pens on sea lice treatments reduced”.
- Sea lice – “measure taken to mitigate against any increased risk to sea management from the modifications proposed are deemed satisfactory as far as can be reasonably foreseen.”
- Containment – the modification is not expected to impact on escape contingency plans or predator interaction mitigation.
- Containment – clarification sought regarding attestation of suitability of equipment.
- Wild fish interactions – assuming adequate control of sea lice in the proposed development. The proposal is not expected to further increase the risk to wild salmonids.
- Sea lice efficacy – further clarification is sought to support applicants’ assumption that no increase to currently consented quantities of chemotherapeutants will be required.

Further information was subsequently provided by the applicant addressing the requests for further information from MSS. Their response was as follows:

- The applicant has not provided the modelling reports, but the outputs provided show benthic impacts are within Environmental Quality Standards.
- Proposed net depth (16m) is well beyond required minimum of 9m.
- Equipment attestation confirms equipment is satisfactory as far as can reasonably be foreseen
- Treatments quantities – applicant has provided further information supporting assumptions that treatment quantities won’t change, based on SEPA’s required modelling. Noted that SEPA CAR licence technical variation is still to be determined.

5.5 Scottish Water – No objection

5.6 Nature Scot – No objection

- Appropriate assessment required in respect of the River Kerry SAC, designated for freshwater pearl mussels. Primary risk is associated with escape events. NS conclude that the proposal will not result in adverse effect on site integrity on the basis that the escape contingency plan for the site is adhered to. NS suggest it may be recommended to secure adherence to the existing escape contingency via a condition.
- No likely significant effect is anticipated for the Inner Hebrides and the Minches SAC nor any of the Special Protection Areas designated for

Breeding Gannet interests.

- The proposal will give rise to a slight negative localised impact however this is not so substantial as to have an adverse effect on the integrity of the Wester Ross National Scenic Area or the objective of its designation.
- Standard mitigation should be applied through the utilisation of dark muted matt colours for equipment used.

5.7 Northern Lighthouse Board - no objection

- Site should be marked with 2 lit yellow Special Mark Poles fitted with a yellow X 'topmark'
- The lights should be attached above the X 'topmarks' that flash yellow every five seconds with a nominal range of 2 nautical miles.
- The poles should be fitted to the Northerly and Easterly corners of the cage group.
- The feed barge should be fitted with an all round fixed white light with a nominal range of two nautical miles.
- Further requirements set out related to regular audits, marking any anchor points avoiding loose lines and updating the UKHO on completion of works.

5.8 The Crown Estate Scotland – no comment received.

6. DEVELOPMENT PLAN POLICY

The following policies are relevant to the assessment of the application

6.1 **Highland Wide Local Development Plan 2012**

28 - Sustainable Design
36 - Development in the Wider Countryside
50 - Aquaculture
57 - Natural, Built & Cultural Heritage
58 - Protected Species
59 - Other important Species
60 - Other Importance Habitats
61 - Landscape
72 – Pollution

6.2 **West Highlands and Islands Local Development Plan 2019**

No specific policies apply

6.3 **Highland Council Supplementary Planning Policy Guidance**

Highland's Statutorily Protected Species (March 2013)
Sustainable Design Guide (Jan 2013)

7. OTHER MATERIAL CONSIDERATIONS

7.1 Scottish Government Planning Policy and Guidance

- SPP (2014) paragraph 204 states:

“...Planning authorities should apply the precautionary principle where the impacts of a proposed development on nationally or internationally significant landscape or natural heritage resources are uncertain but there is sound evidence indicating that significant irreversible damage could occur. The precautionary principle should not be used to impede development without justification. If there is any likelihood that significant irreversible damage could occur, modifications to the proposal to eliminate the risk of such damage should be considered. If there is uncertainty, the potential for research, surveys or assessments to remove or reduce uncertainty should be considered...”

- SPP (2014) paragraph 250 states:

“...The planning system should:

- play a supporting role in the sustainable growth of the finfish and shellfish sectors to ensure that the aquaculture industry is diverse, competitive and economically viable;
- guide development to coastal locations that best suit industry needs with due regard to the marine environment;
- maintain a presumption against further marine finfish farm developments on the north and east coasts to safeguard migratory fish species...”

- SPP (2014) paragraph 253 states:

“...The planning system should not duplicate other control regimes such as controlled activities regulation licences from SEPA or fish health, sea lice and containment regulation by Marine Scotland...”

- The National Marine Plan 2015:

The NMP sets out seven objectives for the aquaculture industry. Notably these address the support for growth within environmental limits and a proportionate and transparent regulatory framework.

The National Marine Plan includes plan policies directly related to aquaculture, of which the following are deemed relevant to the assessment of this proposal.

Policy ‘AQUACULTURE 3’ In relation to nutrient enhancement and benthic impacts, as set out under Locational Guidelines for the Authorisation of Marine Fish Farms in Scottish Waters, fish farm development is likely to be acceptable in Category 3 areas, subject to other criteria being satisfied. A degree of precaution should be applied to consideration of further fish farming development in Category 2 areas and there will be a presumption against further fish farm development in Category 1 areas.

Implementation of Aquaculture 3 is supported by the annually updated guidance document 'Authorisation of marine fish farms in Scottish waters: locational guidelines.

Policy AQUACULTURE 5: Aquaculture developments should avoid and/or mitigate adverse impacts upon the seascape, landscape and visual amenity of an area, following SNH guidance on the siting and design of aquaculture.

AQUACULTURE 9: Consenting and licensing authorities should be satisfied that appropriate emergency response plans are in place.

AQUACULTURE 10: Operators should carry out pre-application discussion and consultation, and engage with local communities and others who may be affected, to identify and, where possible, address any concerns in advance of submitting an application.

AQUACULTURE 11: Aquaculture equipment, including but not limited to installations, facilities, moorings, pens and nets must be fit for purpose for the site conditions, subject to future climate change. Any statutory technical standard must be adhered to. Equipment and activities should be optimised in order to reduce greenhouse gas emissions.

AQUACULTURE 12: Applications which promote the use of sustainable biological controls for sea lice (such as farmed wrasse) will be encouraged.

In addition, the following general marine plan policies apply:

Gen 1 'General planning principle'

Gen 7 'Landscape/ Seascape'

Gen 9 'Natural Heritage'

Gen 11 'Marine Litter'

Rec and Tourism 2

- Scotland 2045 – fourth National Planning Framework (draft for consultation)

Policy 21: Aquaculture states;

"...In order to safeguard migratory fish species further salmon and trout open pen fish farm developments on the north and east coasts of mainland Scotland should not be supported..." thus maintaining the policy approach of SPP (2014) paragraph 250 above.

8. PLANNING APPRAISAL

- 8.1 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.

Section 15 (1) of the Marine (Scotland) Act 2010 requires that all authorisation decisions be taken in accordance with the appropriate marine plans unless relevant considerations indicate otherwise.

Determining Issues

- 8.2 This means that the application requires to be assessed against all policies of the Development Plan relevant to the application, all national and local policy guidance and all other material considerations relevant to the application.

Planning Considerations

- 8.3 The key considerations in this case are:

- a) compliance with the development plan and other planning policy
- b) Visual and landscape impacts
- c) Noise impacts
- d) Marine Litter
- e) Impacts on ecology
- f) Impacts on European sites
- g) any other material considerations.

a) Compliance with the development plan/other planning policy

- 8.4 Policy 50 (Aquaculture) of the Highland-wide Local Development Plan (HwLDP) is the key policy in respect of this application. Policy 50 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 any existing activity. Policy 50 is supported by the National Marine Plan General Planning Principle (GEN 1), which establishes a presumption in favour of sustainable development in the marine environment when consistent with other policies and objectives of the plan, the supporting text for which specifically cites aquaculture and its nationally set targets for growth. National Marine Plan Aquaculture Policies 3, 5, 9, 11 and 12 set out further requirements related to appropriate siting, limiting visual impact, appropriate contingency planning, equipment design, community engagement and use of biological controls of sea lice.
- 8.5 In addition to the policies listed above, Policy 28 'Sustainable Design', Policy 36 'Development in the Wider Countryside', Policy 57 'Natural, Built and Cultural Heritage' and Policy 61 'Landscape' are relevant to landscape, seascape and visual impacts. Policy 28 requires consideration of impacts on landscape, scenery,

individual and community residential amenity and whether proposals demonstrate sensitive siting. Policy 36 requires developments to be assessed in terms of whether siting and design are acceptable and compatible with landscape character and capacity. Policy 57 indicates that for features of local/regional significance developments will be allowed where it can be satisfactorily demonstrated there would not be an unacceptable impact on the natural environment. The requirements of Policy 57 are mirrored in National Marine Plan Policy Gen 9 'Natural Heritage'. Policy 61 requires that new developments are designed to reflect the landscape characteristics and special qualities identified in the Landscape Character Assessment of the area in which they are proposed, the requirements of which are largely mirrored in National Marine Policy GEN 7 'Landscape/ Seascape'.

- 8.6 Policy 72 'Pollution' requires that proposals that may result in significant noise or light pollution provide detailed assessments of these impacts and how the pollution can be avoided or mitigated. National Marine Plan Policy GEN 11 'Marine Litter' adds that reduction of marine litter must be taken into account by decision makers.
- 8.7 Subject to ensuring that the above requirements are met then the proposal would accord with the development plan

b) Visual and landscape impacts

- 8.8 The proposal is located within the Wester Ross National Scenic Area which lists 'the superb coast and coastal views' and 'the abundance of water, a foreground to dramatic views' amongst its special qualities.
- 8.9 The proposal seeks to add to an existing arrangement of pens previously approved. In support of the application the applicant provided a series of visualisations which aid in considering the visual impact along with a map showing the zone of theoretical visibility.
- 8.10 Nature Scot advice noted that an expansion would likely have a slight adverse effect but that this would not be significantly detrimental to the integrity of the designated area, and not significantly different from past configurations at that site.
- 8.11 With regard to the supporting information supplied by the applicant and Nature Scot advice, officers consider that impacts on the Wester Ross NSA are within acceptable limits. The zone of theoretical visibility shows that the additional pens would increase visibility of the farm. However, this increase would be marginal and primarily related to certain viewpoints looking from the West towards the peninsula that the rest of the farm is sheltered by. When viewed from the East and North the additional pens appear contiguous with the existing array and have limited additional impact. It is recommended that if permission is granted that this be subject to conditions being applied that would require mitigation of visual impacts through appropriate design and colour of equipment.
- 8.12 More general concerns related to visual amenity were also raised by most of the third-party objectors. These primarily were related to visual impacts at night due to light pollution that would result from the navigational marking requirements set out by the Northern Lighthouse Board for the proposal.

- 8.13 The existing permitted fish farm is marked at its northern point with a flashing navigational warning light along with a fixed white light atop the feed barge. These lights must be visible at 2 nautical miles, a range at which most of the key visual receptors along the north shore of the Upper loch Torridon are within.
- 8.14 Proposed marking requirements for the proposal leave these elements unchanged, although the northern point of the development would move northwards by approximately 75m. The only additional lighting required would be to the Easternmost corner of the full pen array which is some way to the South.
- 8.15 In essence the concerns raised are in relation to additional lighting . Objectors did not identify that the majority of the lighting their stated concerns related to has been in operation for several years. With this in mind, it seems reasonable to conclude that the impacts on visual amenity, in particular with regards to the 'dark sky' qualities of the area, are within acceptable limits and that the change to navigational marking required as a result of this proposal is likely to be minor in its effect.
- 8.16 On the basis of the assessments above it is concluded that the proposal accords with the landscape and visual considerations of Highland Wide Development Policy, 28, 36, 57 and 61, along with National Marine Plan Policy GEN 7.

c) Noise Impacts

- 8.17 Several third-party comments cited issues of noise pollution associated with the existing development and raised concerns over the additional noise that may be associated with operation and maintenance of the two additional pens proposed by the applicant.
- 8.18 The existing development has been subject to a number of previous noise complaints and at the point of the most recent planning decision (20/01745/S42) was subject to a planning condition requiring a programme of noise monitoring and implementation of noise mitigation.
- 8.19 The application includes noise monitoring reports from the previous two years along with an action plan that provides a record of noise mitigation implemented. This is relevant to the proposal in that this same equipment would be used in relation to the service and operation of the additional pens. The accompanying reports detail that where noise monitoring has identified equipment emitting noise at levels above statutory thresholds at key receptor locations, then mitigation has successfully been implemented to reduce this. In other cases measures have been put in place to reduce other noise emitting equipment that, although not a statutory breach, may be audible to an extent that affects general amenity.
- 8.20 Some noise emitting operations are associated with treatments for fish health. The proposal seeks an expansion that would allow stocking densities to be reduced which in turn may improve fish health and reduce requirements for treatment operations. The supporting information also indicators the proposed management approach of treatment interventions being 'pen by pen' will be applied. The above points suggest it cannot be assumed that the additional pens would result in any material increase in noisy operations.

8.21 Consultation advice from Environmental Health Officers indicate that no significant concerns are held in relation to proposal for the additional pens. However, the proposal would result in a slight encroachment northward towards the key receptors. In consideration of this and the concerns raised via third-party comment the officer recommendation is that further noise monitoring and associated mitigation action plan be secured via planning condition.

d) Marine litter

8.22 Third party comment raised concerns over the presence of marine litter found along the local coastline that is understood to originate from fish farm operations. This concern points to the risk that additional pens may result in increased deposition of marine litter in the local area.

8.23 It is not evident however that that existing marine litter within the area has its source at the existing fish farm to which the proposal relates. The applicant has subsequently clarified that they have undertaken regular site checks for any losses of equipment.

8.24 The addition of the pens put forward in the proposal is not deemed likely to significantly increase the risk of marine litter entering the environment. The procedures in place by the applicant would appear reasonable and proportionate to mitigate any residual risk the proposal introduces.

e) Impacts on ecology

8.25 Several third-party objectors raised concerns that the additional two pens the proposal seeks would result in negative impacts upon the benthic (seabed) habitats beneath. Similarly, Marine Scotland Science Sought assurances from the applicant that modelling of benthic impacts had occurred.

8.26 Further supporting information supplied by the applicant confirmed that whilst the depositional footprint would increase if the proposal were to go ahead, the intensity of deposition across the site would decrease as a result of the same biomass of fish being spread further apart, a view confirmed in the consultation response of SEPA. The applicant went on to state that the levels of deposition would be within SEPA's Environmental Quality Standards. It should be noted that benthic impacts are regulated separately via the SEPA CAR licensing process under which the applicant is currently seeking a technical variation to their permission.

8.27 National Marine Plan Policy; Aquaculture 3 addresses appropriate siting in relation to benthic impacts. The policy is supported by annually updated guidance that categorises areas based on their potential suitability and sensitivity with the proposals location falling within a category 3 area. The policy specifies 'fish farm development is likely to be acceptable in Category 3 areas, subject to other criteria being satisfied'.

8.28 Further details of the seafloor habitat in the area of the proposed additional pens were not included along with the application. However, information supporting the decision on the existing farm identified that the area was comprised of 'Sublittoral sands and gravel' one of the most widespread habitats below tide level in the UK

and likely to have low sensitivity to the development.

- 8.29 A single third-party comment raised concern over the potential for impact on wild salmonids within the Loch system. However, the two additional pens sought via this application are not anticipated to increase risk to wild salmonids in any appreciable manner and in fact may reduce existing impacts. Marine Scotland Science supports the view that no additional risk is likely. It also confirms that sea lice management procedures at the farm site appear adequate.
- 8.30 Sea lice management procedures that would apply to the additional pens utilise biological controls via cleaner fish as a preference and seek no additional authorisations via SEPA for increased use of chemotherapeutants. Again, Marine Scotland Science opinion broadly confirms the measures in place are satisfactory.
- 8.31 Several third-party comments raised concerns over increased inputs of anti-foulants as a result of the increased det-washing associated with the additional pens. The applicant has clarified that neither the nets currently used at the site, or the nets associated with this proposal contain an antifoulant coating nor are any used as part of the net washing process.

f) Impacts on European sites

- 8.32 Nature Scot advice identified that the proposal does have the potential to impact upon several European sites. Of these, no likely significant effect was determined for Special Protection Areas for Gannets. Due to the site's location within 35km of the River Kerry Special Area of Conservation, designated for freshwater pearl mussels it was advised that an appropriate assessment was required for this site/feature.
- 8.33 The appropriate assessment concluded no adverse effect on the integrity of the site in consideration of the known qualities and likely sensitivities of the features of this site and the limited additional pressures this proposal is likely to introduce. The key risk the additional pen equipment would introduce is around equipment failure and potential escape events.
- 8.34 Equipment attestations provided have satisfied Marine Scotland Science's requirements. A copy of the containment and contingency escapes plan currently in place for the existing site has been supplied as supporting information. If the proposal is granted permission, this will apply to the additional pens as part of the wider site, thus securing appropriate mitigation.

g) Other material considerations

- 8.35 The proposal's potential to impact generally upon tourism was raised in third-party comment. However, no specific evidence has been identified to support the concern. The Highland Wide Local Development Plan does not include policy which addresses this issue directly, but the National Marine Plan's Tourism and Recreation Policy 2 does address the question of marine development impacting upon tourism activity. The extent to which the proposal may affect the qualities of the area. This states that consideration should be given to "...the extent to which the proposal will alter the qualities important to recreational users..." and "...Where

significant impacts are likely, whether reasonable alternatives can be identified for the proposed activity or development...". In consideration of the appraisal above regarding both visual amenity and the impacts of the lighting it is not considered that the proposal will significantly alter or impact the qualities of the area.

8.36 Existing conditions for the Upper Loch Torridon fish farm.

The proposal seeks to add to an existing fish farm and extend the planning boundary that applies to this site. The site itself has existing management procedures and practices in place, which were secured as mitigation through the EIA process, some of which are detailed in the supporting information supplied alongside this application. For the avoidance of doubt if this current proposal is granted permission, it will be understood to then form part of the wider existing site, and such be subject to the same mitigation and associated procedures detailed within the management plans for the site as whole.

Non-material considerations

8.37 Third party comment raised the point that lower stocking densities could be achieved by the applicant using the existing equipment by reducing biomass. However, consideration of alternative options for management of the existing site are not a material consideration in relation to this proposal. In fact, planning policy within both the Highland Wide LDP and the National Marine Plan directs that where relevant impacts are within acceptable limits the determining authority should support aquaculture development.

8.38 Third party comments have cited a lack of responsiveness from the applicant to complaints made in relation to the existing development. The quality of the relationship between applicant and other loch side neighbours is not material to the consideration of this proposal.

8.39 Third-party comments raised concerns that the development proposed had already been carried out and thereby had tacit approve in advance. Further investigation confirmed that this application is not for permission in retrospect and that no additional stocked pens are installed at the site. At the point of application, the applicant had moored two additional pens at the site for temporary storage.

Matters to be secured by Section 75 Agreement

8.40 **None**

9. CONCLUSION

9.1 The proposal includes the addition of two pens at the site of an existing fish farm. No variations to the proposal have been sought during the application process. The proposal will allow for lower stocking densities across the whole site.

9.2 The proposal falls within Wester Ross National Scenic Area and its visual impact is a material consideration. The proposal is considered to have a slight adverse effect, but this is not likely to significant enough to be considered a reason for refusal.

- 9.3 Several third-party comments raised objections around amenity issues associated with light, noise and marine litter pollution. Although these concerns raise material considerations, it is not considered the impacts associated with the addition of the two pens would warrant refusal. In the case of light pollution there is very little change anticipated from that which is currently in effect. In the case noise it is evident that the applicant has taken appropriate action in the recent past to appropriately mitigate the existing developments impacts. Given the history of the site, it is deemed appropriate to secure further mitigation to protect against any additional impact the proposal may introduce. With regards to marine litter the applicants standard operating procedures appear appropriate proportionately manage the risk of additional litter the proposal may introduce.
- 9.4 Ecological pressures the proposal introduces are material considerations and are touched on by several third-party comments. The evidence and stakeholder comment suggests that any impacts are within acceptable limits and that the proposal has the potential to reduce impacts of the site as a whole in some regards.
- 9.5 The proposal is deemed capable of effecting European designated sites. However, this effect has been assessed as either not likely to be significant or not capable of having an adverse effect on site integrity either alone or in combination with other plans or projects. This assessment is supported by the advice of nature Scot and the HRA record is attached as an appendix to this report.
- 9.6 The Council has adopted an EIA screening opinion that the proposal does not require an Environmental Impact Assessment. This is on that basis that although the proposal does fall within the definition of 'Schedule 2 development', impact on the receiving environment, while possible, is not considered to be significant. Therefore, the proposed development does not constitute 'EIA development' and Environmental Impact Assessment (EIA) is not required. This conclusion was reached having screened the proposal against the selection criteria outlined in Schedule 3 (including cumulative impact, pollution, impact on natural resources/the natural environment, environmental quality and the historic environment)
- 9.7 All relevant matters have been taken into account when appraising this application. It is considered that the proposal accords with the principles and policies contained within the Development Plan and the National Marine Plan and is acceptable in terms of all other applicable material considerations.

10. IMPLICATIONS

- 10.1 Resource: Not applicable
- 10.2 Legal: Not applicable
- 10.3 Community (Equality, Poverty and Rural): Not applicable
- 10.4 Climate Change/Carbon Clever: Not applicable

10.5 Risk: Not applicable

10.6 Gaelic: Not applicable

11. RECOMMENDATION

Action required before decision issued

Notification to Scottish Ministers N

Conclusion of Section 75 N
Obligation

Revocation of previous permission N

Subject to the above actions, it is recommended to

GRANT the application subject to the following conditions and reasons

- 1 The surface equipment shall be coloured to match the existing farm equipment unless agreed in writing by the planning authority

Reason: In the interests of minimising visual impact within the NSA

- 2 All lighting above the water surface and not required for safe navigation purposes should 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 ensure the landscape and visual impact of the development upon the NSA and local amenity is minimised

- 3 Following the installation and operation of any equipment hereby approved a further noise impact assessment should be undertaken to establish if the additional pens have resulted in a material change to the sound profile of the farm operations. The Noise impact assessment shall be carried out so as to align with those previously undertaken in compliance with condition 2 of planning permission 20/01745/S42. A report shall be prepared and submitted to the planning authority. The report shall:

- i. Include a detailed assessment of vessels servicing the farm,
- ii. Detail how or if the additional pens have altered the noise emitting from the fish farm site.
- iii. Show where required measures have been put in place to resolve any identified noise impacts at noise sensitive premises to the north of the farm.
or
- iv. Identify further measures to be taken to achieve

such resolution.

Reason: In the interests of residential amenity.

- 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, buoying, 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.

REASON FOR DECISION

All relevant matters have been taken into account when appraising this application. It is considered that the proposal accords with the principles and policies contained within the Development Plan and is acceptable in terms of all other applicable material considerations.

TIME LIMIT FOR THE IMPLEMENTATION OF THIS PLANNING PERMISSION

In accordance with Section 58 of the Town and Country Planning (Scotland) Act 1997 (as amended), the development to which this planning permission relates must commence within THREE YEARS of the date of this decision notice. If development has not commenced within this period, then this planning permission shall lapse.

INFORMATIVES

Initiation and Completion Notices

The Town and Country Planning (Scotland) Act 1997 (as amended) requires all developers to submit notices to the Planning Authority prior to, and upon completion of, development. These are in addition to any other similar requirements (such as Building Warrant completion notices) and failure to comply represents a breach of planning control and may result in formal enforcement action.

1. The developer must submit a Notice of Initiation of Development in accordance with Section 27A of the Act to the Planning Authority prior to work commencing on site.
2. On completion of the development, the developer must submit a Notice of Completion in accordance with Section 27B of the Act to the Planning Authority.

Copies of the notices referred to are attached to this decision notice for your convenience.

Flood Risk

It is important to note that the granting of planning permission does not imply there is an unconditional absence of flood risk relating to (or emanating from) the application site. As per Scottish Planning Policy (paragraph 259), planning permission does not remove the liability position of developers or owners in relation to flood risk.

Scottish Water

You are advised that a supply and connection to Scottish Water infrastructure is dependent on sufficient spare capacity at the time of the application for connection to Scottish Water. The granting of planning permission does not guarantee a connection. Any enquiries with regards to sewerage connection and/or water supply should be directed to Scottish Water on 0845 601 8855.

Septic Tanks & Soakaways

Where a private foul drainage solution is proposed, you will require separate consent from the Scottish Environment Protection Agency (SEPA). Planning permission does not guarantee that approval will be given by SEPA and as such you are advised to contact them direct to discuss the matter (01349 862021).

Local Roads Authority Consent

In addition to planning permission, you may require one or more separate consents (such as road construction consent, dropped kerb consent, a road openings permit, occupation of the road permit etc.) from the Area Roads Team prior to work commencing. These consents may require additional work and/or introduce additional specifications and you are therefore advised to contact your local Area Roads office for further guidance at the earliest opportunity.

Failure to comply with access, parking and drainage infrastructure requirements may endanger road users, affect the safety and free-flow of traffic and is likely to result in enforcement action being taken against you under both the Town and Country Planning (Scotland) Act 1997 and the Roads (Scotland) Act 1984.

Further information on the Council's roads standards can be found at:

<http://www.highland.gov.uk/yourenvironment/roadsandtransport>

Application forms and guidance notes for access-related consents can be downloaded from:

http://www.highland.gov.uk/info/20005/roads_and_pavements/101/permits_for_working_on_public_roads/2

Mud & Debris on Road

Please note that it is an offence under Section 95 of the Roads (Scotland) Act 1984 to allow mud or any other material to be deposited, and thereafter remain, on a public road from any vehicle or development site. You must, therefore, put in place a strategy for dealing with any material deposited on the public road network and maintain this until development is complete.

Construction Hours and Noise-Generating Activities: You are advised that construction work associated with the approved development (incl. the loading/unloading of delivery vehicles, plant or other machinery), for which noise is audible at the boundary of the application site, should not normally take place outwith the hours of 08:00 and 19:00 Monday to Friday, 08:00 and 13:00 on Saturdays or at any time on a Sunday or Bank Holiday in Scotland, as prescribed in Schedule 1 of the Banking and Financial Dealings Act 1971 (as amended).

Work falling outwith these hours which gives rise to amenity concerns, or noise at any time which exceeds acceptable levels, may result in the service of a notice under Section 60 of the Control of Pollution Act 1974 (as amended). Breaching a Section 60 notice constitutes an offence and is likely to result in court action.

If you wish formal consent to work at specific times or on specific days, you may apply to the Council's Environmental Health Officer under Section 61 of the 1974 Act. Any such application should be submitted after you have obtained your Building Warrant, if required, and will be considered on its merits. Any decision taken will reflect the nature of the development, the site's location and the proximity of noise sensitive premises. Please contact env.health@highland.gov.uk for more information.

Protected Species – Halting of Work

You are advised that work on site must stop immediately, and NatureScot must be contacted, if evidence of any protected species or nesting/breeding sites, not previously detected during the course of the application and provided for in this permission, are found on site. For the avoidance of doubt, it is an offence to deliberately or recklessly kill, injure or disturb protected species or to damage or destroy the breeding site of a protected species. These sites are protected even if the animal is not there at the time of discovery. Further information regarding protected species and developer responsibilities is available from NatureScot: <https://www.nature.scot/professional-advice/protected-areas-and-species/protected-species>

Signature: Dafydd Jones
Designation: Area Planning Manager – Area Planning Manager - North
Author: Jethro Watson
Background Papers: Documents referred to in report and in case file.
Relevant Plans:

Document Type	Document No.	Version No.	Date Received
Plan 1 Committee Plan			
Plan 2 – Site Location	1	1	24.06.2022
Plan 3 – Site Layout	1	1	24.06.2022
Plan 4 – Existing Site Configuration	1	1	24.06.2022
Plan 5 – Proposed Site Configuration	1	1	24.06.2022
Plan 6 – Pen Plans and Elevations	1	1	24.06.2022

Appendix B – Habitats Regulations Appraisal

The status of European protected sites such as SACs and SPAs, under the EC Directive 92/43/EEC, the ‘Habitats Directive’, means that the Conservation (Natural Habitats, etc.) Regulations 1994 (as amended), also known as the ‘Habitats Regulations’, apply.

Under the Habitat Regulations, The Highland Council, as a competent authority in the planning system, must consider whether any planning proposal, prior notification for permitted development rights or plan (e.g. Local Development Plan) will have a ‘likely significant effect’ on a European site. If so, they must carry out an ‘appropriate assessment’. The council must also seek advice from NatureScot and have regard to their representations during the HRA process.

The Highland Council must not authorise a plan or grant a planning application unless it can show beyond reasonable scientific doubt – using appropriate assessment – that the plan or planning proposal will not adversely affect the integrity of a European site.

Date: 27/09/2022

Author: Jethro Watson

A. EUROPEAN SITE DETAILS

Name of European Site(s) potentially affected:

- River Skerry Special Area of Conservation (SAC)
- Inner Hebrides and the Minches Special Area of Conservation (SAC)
- Sule Skerry and Sule Stack Special Protection Area (SPA)
- North Rona and Sula Sgeir Special Protection Area
- Ailsa Craig Special Protection Area
- Forth Islands Special Protection Area

Qualifying interest(s) at the site:

This information can be obtained from NatureScot (SNH) site link website - <https://sitelink.nature.scot/map>

River Kerry SAC

Qualifying Species: Freshwater pearl mussel

Inner Hebrides and the Minches SAC

Qualifying species: Harbour porpoise

Sule Skerry and Sule Stack, St Kilda, North Rona and Sula Sgeir, Ailsa Craig and the

Forth Islands SPAs

Qualifying species: Gannet

Conservation objectives at the site:

This information can be obtained from NatureScot (SNH) site link website -

<https://sitelink.nature.scot/map>

River Kerry Special Area of Conservation

To avoid deterioration of the habitats of the qualifying species (listed below) or significant disturbance to the qualifying species, thus ensuring that the integrity of the site is maintained, and the site makes an appropriate contribution to achieving favourable conservation status for each of the qualifying features; and

To ensure for the qualifying species that the following are maintained in the long term:

- Population of the species as a viable component of the site
- Distribution of the species within site
- Distribution and extent of habitats supporting the species
- Structure, function and supporting processes of habitats supporting the species
- No significant disturbance of the species
- Distribution and viability of the species' host species
- Structure, function and supporting processes of habitats supporting the species' host species

Inner Hebrides and the Minches SAC

Qualifying species: Harbour porpoise

- To ensure that the Inner Hebrides and the Minches SAC continues to make an appropriate contribution to harbour porpoise remaining at favourable conservation status.
- To ensure for harbour porpoise within the context of environmental changes, that the integrity of the Inner Hebrides and the Minches SAC is maintained through 2a, 2b and 2c:
- 2a. Harbour porpoise within the Inner Hebrides and the Minches are not at significant risk from injury or killing.
- 2b. The distribution of harbour porpoise throughout the site is maintained by avoiding significant disturbance.
- 2c. The condition of supporting habitats and the availability of prey for harbour porpoise are maintained.

Special Protection Areas with breeding Gannet interests:

To avoid deterioration of the habitats of the qualifying species (Gannet) or significant disturbance to the qualifying species, thus ensuring that the integrity of the site is maintained; and

To ensure for the qualifying species that the following are maintained in the long term:

- Population of the species as a viable component of the site
- Distribution of the species within site
- Distribution and extent of habitats supporting the species
- Structure, function and supporting processes of habitats supporting the species
- No significant disturbance of the species

B. PROPOSAL DETAILS

Planning Application Reference:

22/02482/FUL

Proposal Name:

Marine Fish Farm - Atlantic Salmon: alteration to install two additional 120m circumference cages

Location:

Upper Loch Torridon, Shieldaig

Description of proposal:

Marine Fish Farm - Atlantic Salmon: alteration to install two additional 120m circumference cages.

Is the proposal directly connected with or necessary to site management for conservation?

No

C. NatureScot Advice

While the responsibility to carry out the HRA Screening and Appropriate Assessment rests with the Council, NatureScot (previously SNH) provides an advisory role to help determine whether an Appropriate Assessment is needed and what needs to be included in the assessment. As part of the the HRA the council must consult with NatureScot and take consideration of their advice. This requirement is outlined in

regulation 48 (3) of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended (The 'Habitats Regulations').

This advice is usually provided as part of NatureScot's formal consultation response for a planning application and will be detailed within the section of the relevant to designated European site.

Outline relevant advice from NatureScot received 18/08/2022:

River Kerry SAC

This proposal is likely to have a significant effect on the freshwater pearl mussel qualifying interest of the River Kerry SAC due to the potential impact of escaped farmed salmon from the proposal on the host species. Consequently, the Highland Council, as competent authority, is required to carry out an appropriate assessment in view of the site's conservation objectives for its qualifying interest.

To help you do this we advise that, in our view, based on the information provided and our appraisal carried out to date, **the proposal will not adversely affect the integrity of the site**. The appraisal we carried out considered the impact of the proposals on the following factors:

The applicant confirms that they "will adhere to the recommendations made by the Containment Working Group, a sub-group of the Strategic Framework, the SSPO Code of Good Practice and the Scottish Technical Standard" and that the farm will have "site-specific escape prevention and contingency plans to provide effective means of reporting and potentially recapturing escapee farm stock". Therefore we can conclude that so long as they adhere to the plan, there will be no adverse effect on site integrity of the River Kerry SAC. The Highland Council may wish to secure this as a condition to any planning permission given.

The site is within the 35km buffer that our guidance suggests as the potential threshold for advising competent authorities of likely significant effect on the freshwater pearl mussel feature due to the potential effect of sea lice on migratory salmonids.

We have good evidence that the pearl mussel population in the River Kerry SAC uses juvenile Atlantic salmon as the preferred host species. Our recent Research Report no. 972 included surveys of the River Kerry which identified salmon as the host. This conforms with evidence from surveys undertaken in the between 1997 and 2002 which also suggested salmon were the preferred host (Hastie & Young, 2003).

We do not know the migration route for the post-smolts after they leave the River Kerry. However they are most likely to leave the River Kerry and migrate in a northerly or westerly direction to their feeding grounds in the North Atlantic. As such we would advise that, as this proposed extension to the existing fish farm site is reasonably distant to the south and around a headland within a loch, there is unlikely to be connectivity between sea lice that may emanate from the site and the main host species of the River Kerry SAC.

Inner Hebrides and the Minches SAC

The development is approximately 4 kilometres outside the boundary of Inner Hebrides and the Minches SAC which is of European importance for harbour porpoise. Our advice is that **this proposal is unlikely to have a significant effect on harbour porpoise within Inner Hebrides and the Minches SAC** and therefore no further assessment is required. Harbour porpoise are sensitive to noise disturbance, and therefore the use of Acoustic Deterrent Devices (ADDs) would be a concern. However, from the information supplied, the applicant does not appear to be proposing to use ADDs (see Appendix 9 Farm Management Statement and Appendix 10 Predator mitigation plan). Should ADDs be required at the site in the future then a European Protected Species (EPS) licence will be required before they are deployed. At that stage MS-LOT, as the licencing authority, would be required to carry out a Habitats Regulations Appraisal for the SAC before granting an EPS licence.

Other interactions are covered in the SAC Conservation and Management Advice, available via Sitelink - <https://sitelink.nature.scot/site/10508>

Special Protection Areas with breeding Gannet interests

There is connectivity between this development and a number of Special Protection Areas (SPAs) which are of European importance for breeding gannet. There is a risk that gannet become entangled or entrapped in fish farm top nets. However for smaller mesh sizes the risks of such damaging interactions are considered to be low. The current farm and the proposed extension will use 'hamster wheel' type top net supports rather than pole mounted top nets with a mesh size of less than 100mm, therefore **this proposal is unlikely to have a significant effect on the breeding gannet interests of Sule Skerry and Sule Stack; St Kilda; North Rona and Sula Sgeir; Ailsa Craig; Forth Islands.**

D. SCREENING

'Screening' is the initial evaluation of a project's potential effects on one or more European sites to determine whether an Appropriate Assessment is required. If an appropriate assessment is required, the output of screening should indicate which European sites are affected and which aspects of the project are likely to have significant effects.

IS THE PROPOSAL (EITHER ALONE OR IN COMBINATION WITH OTHER PROPOSALS) LIKELY TO HAVE A SIGNIFICANT EFFECT ON THE SITE?

River Kerry SAC

Highland Council have considered the statutory nature conservation advice provided by Nature Scot and conclude that **a likely significant effect cannot be ruled out** without further assessment and/ or securing mitigation. Therefore, **an appropriate assessment is required** for the qualifying species of this site.

Inner Hebrides and the Minches SAC

Highland Council have considered the statutory nature conservation advice provided by Nature Scot and conclude **no likely significant effect** regarding the potential impact of this proposal on Harbour Porpoise. This conclusion is based on the specifications of the proposal which confirm that development is not likely to generate a pressure to which the qualifying species of relevance are sensitive to (underwater

noise).

Special Protection Areas with breeding Gannet interests

Highland Council have considered the statutory nature conservation advice provided by Nature Scot and conclude **no likely significant effect** regarding the potential impact of this proposal on gannet features of these sites either alone or in combination with other development. This conclusion is based upon the design specifications of the proposal, which although put forward as a design choice rather than mitigation, are understood to reduce the risk posed to diving Gannets.

E. Appropriate Assessment

The appropriate assessment consists of two parts: a scientific, reasoned appraisal and a conclusion. Consider the proposed project, its impact on the qualifying interests assessed against their conservation objectives.

For each qualifying interest effected evaluate potential impacts of proposal detailing which aspects of the proposal are involved, the duration and size of the impact, and the overall effect on sites conservation objectives. Sufficient detail should be included to conclude the proposal will not adversely affect site integrity. This conclusion should be reached beyond scientific doubt.

Advice contained within Planning Circular 6/1995 stipulates that the assessment can be based on information submitted from other agencies e.g. NatureScot and the applicant.

*The council can only agree to the proposal after having ascertained that it **will not have an adverse effect on the integrity of the sites (AESI)**. If this is not the case, and there are not alternative solutions, the proposal can only be allowed to proceed if there are imperative reasons of overriding public interest, which in this case can include those of a social or economic nature (please see seek further guidance if this is the case).*

Undertake an Appropriate Assessment of the implications for the site in view of its conservation objectives:

Feature condition assessments available for the site^{1 2} show that the qualifying species - Fresh Water Pearl Mussel – is in 'favourable' condition. However, it is not clear that much confidence can be ascribed to this assessment given the last

¹ <https://sitelink.nature.scot/site/8359>

² <https://informatics.sepa.org.uk/ProtectedNatureSites/>

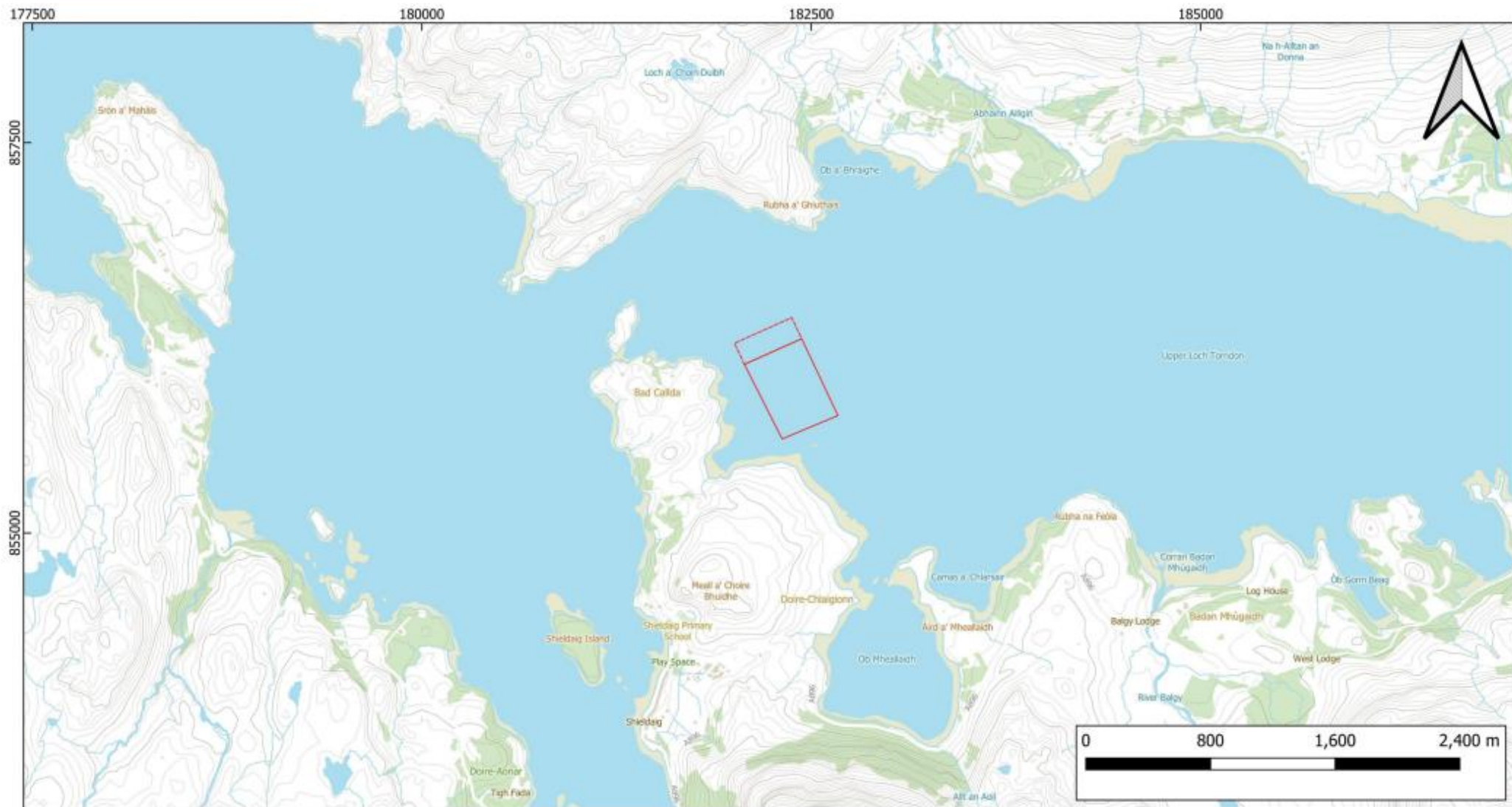
published assessment visit is dated from 2002.

The proposal may generate pressures on the qualifying species' host species (Atlantic Salmon) via either escaped farmed Salmon or from the spread or dispersal of sea lice from the farm site.

Nature Scot's advice states that the proposal is within the 35km buffer used to advise LSE for freshwater Pearl Mussel features. However, their advice also indicates that there is a relatively low likelihood of a pathway for impact based on (a) the predicted/ expected migratory routes of host species and (b) the use of juvenile salmon as the preferred hosts within this population of freshwater pearl mussel. These aspects of Nature Scots advice taken together with the details of the proposal i.e. it is for two additional cages, with no biomass increase, support a conclusion that risk from sea lice in this instance is not anticipated to result in an adverse effect on site integrity.

Farm operations present a risk of escape incidents. Should such an incident occur then this would likely impact upon wild populations that provide the host species for the freshwater pearl mussel qualifying species within the SAC. Nature Scot advice indicates that this risk, if not properly managed could result in a significant effect on the site. However, the proposal is an expansion of existing site with pre-existing mitigation in place. Equipment to be used matches that on site already and attestations have been supplied and accepted by Marine Scotland Science. The existing existing procedures and plans in place for the whole site are deemed suitable and adherence is required for the site via an existing planning condition for the existing development. Nonetheless, for the avoidance of doubt copies of the relevant plans were requested to support the current application and the mechanism for securing adherence will be addressed within the decision report. On this basis it is concluded that this pressure is also unlikely to result in adverse effect on site integrity.

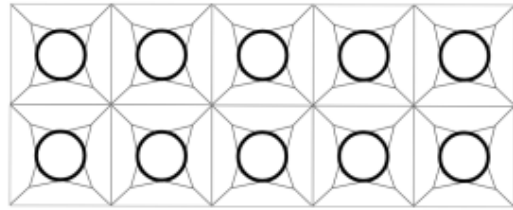
The pressures identified as relevant to the proposal are such that there is either (a) a very limited or low likelihood pathway for impact or (b) that the proposal is such that there is a negligible increase in risk/ pressure generated. There are other farm operations within the wider Torridon Loch system that will likely generate similar pressures/ risks. Although the presence of these might increase the risk of impact across the area, the pressures considered are not necessarily likely to eventuate or act in-combination on the features of the site. Therefore, in consideration of the above factors, including Nature Scots statutory nature conservation advice it is concluded the proposal will not result in an adverse effect on site integrity, either alone or in-combination with other projects.



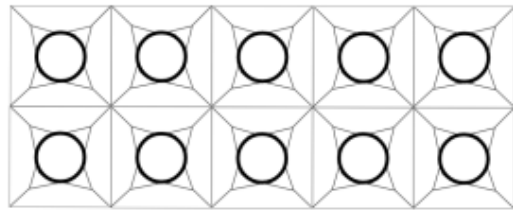
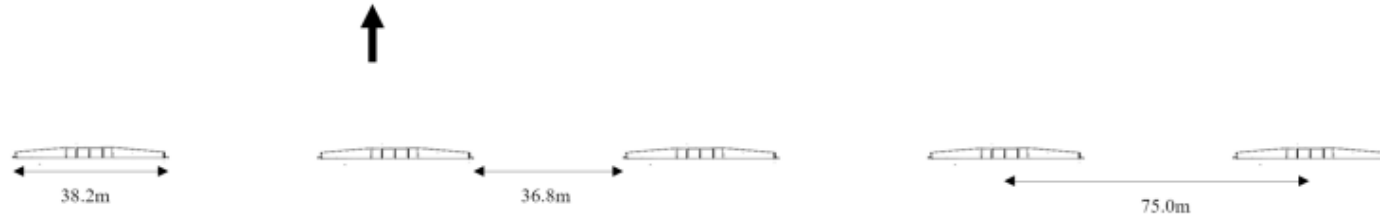
Torridon Fish Farm	Legend Existing planning area Proposed planning area	1:25000	2022-05-25	KM
MAP OF SITE LOCATION				
General view of existing and proposed locations		Scale	Date	Drawn



Torridon Fish Farm	Legend			
MAP OF SITE LOCATION	<ul style="list-style-type: none"> Existing pens Proposed pens Existing grid Proposed grid Feed barge Proposed raft Existing planning area Proposed planning area Proposed moorings 	1:5000	2022-05-26	KM
Detailed view of existing and proposed surface equipment and mooring areas		Scale	Date	Drawn



Plan – Not to scale



Plan – Not to scale



EXISTING: TORRIDON SALMON FARM

PLANS AND ELEVATIONS - EXISTING SITE CONFIGURATION

Figure 1: Plan and surface cross sectional elevation views (as observed from direction of arrow) of 10 circular plastic pens of 120m circumference in a 75m matrix grid (shown in plan view).

Key:

 Typical pen design with hamster wheel.

1:1,250

28/04/2022

KM

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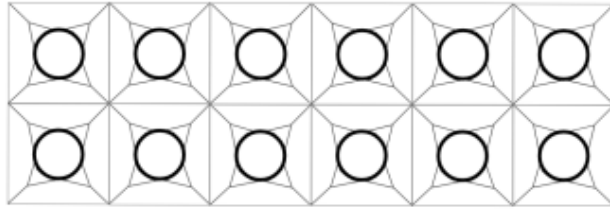
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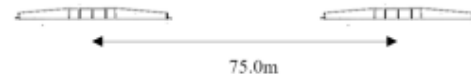
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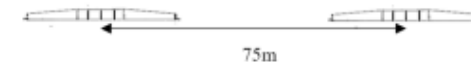
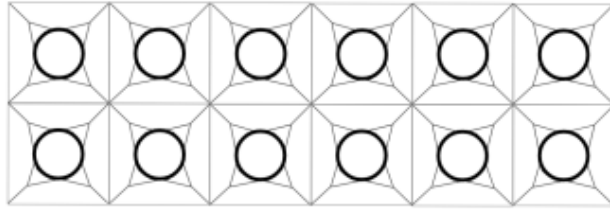
Status



Plan – Not to scale



Plan – Not to scale

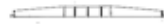


PROPOSED: TORRIDON SALMON FARM

PLANS AND ELEVATIONS - PROPOSED SITE CONFIGURATION

Figure 2: Plan and surface cross sectional elevation views (as observed from direction of arrow) of 12 circular plastic pens of 120m circumference in a 75m matrix grid (shown in plan view).

Key:



Typical pen design with hamster wheel.

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28/04/2022

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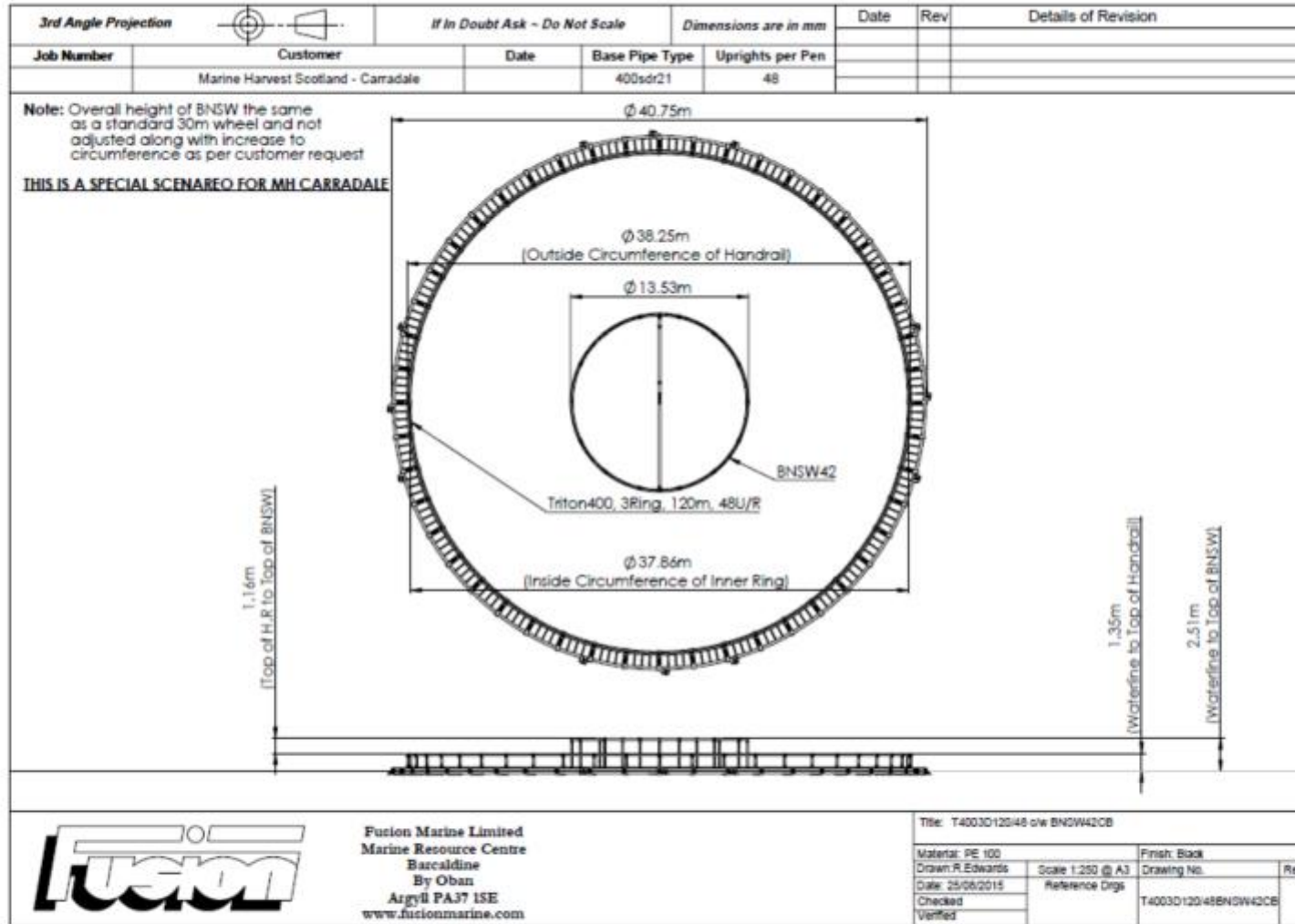
Scale

Date

Drawn

Revision No.

Status



TORRIDON SALMON FARM	Comments: Hamster-wheel top net support design. This design is the same for both existing and proposed pens at the Torridon salmon farm.	Not to Scale	28/04/2022	KM	0001	Draft
PLAN & ELEVATION - EXAMPLE OF A TYPICAL PEN DESIGN TOP NET SUPPORT OPTION 2		Scale	Date	Drawn	Revision No.	Status
Figure 3: Manufacturers Diagram						