

**From:** Graeme Glencorse [<mailto:GGlencorse@ashglasgow.com>]  
**Sent:** 11 September 2012 15:21  
**To:** Paul Condy  
**Cc:** James Truscott; Penny Hawdon  
**Subject:** RE: Gometra Fish Farm - SNH Response Letter - 7 Sept 2012

Hi Paul,

Following the SNH response, we have the following observations to make:

### **1. Advice**

- SNH agree with the LVIA conclusions that potential effects on the Loch na Keal National Scenic Area would be limited and therefore withdraw their objection to the proposed development on landscape grounds;
- Recommend that an Aquaculture Framework is developed for Mull which considers landscape and visual capacity to accommodate further large scale aquaculture development. This is a comment aimed more at Argyll and Bute Council.
- Agree that the LVIA report and supporting LVIA Addendum is considered adequate in terms of enabling SNH to form their own conclusions. Highlighted concerns regarding the lack of information in relation to potential cumulative impacts from certain viewpoints.

## **APPENDIX 1**

### **1. Landscape**

SNH concur with the findings set out in the LVIA (August 2012) and acknowledge that significant impacts are relatively localised and will therefore, not adversely impact on the integrity of the NSA.

### **2. Visual Impacts**

SNH acknowledge that views of the proposed development would be localised significant adverse, but otherwise not significant.

### **3. Cumulative landscape and visual impacts**

We acknowledge that no cumulative landscape and visual impact assessment has been undertaken within the LVIA Addendum. We can confirm that short sections of the B8073 road would experience sequential impacts of the existing Tuath fish farm and the proposed Gometra Fish Farm. However, these would only be experienced from short sections due to the winding nature of the road with several hairpin bends and partial screening provided by adjacent trees. Of the existing and proposed fish farms, Loch Tuath would be the most prominent from the road due to the roads proximity to the loch shore, further west the road heads inland and the proposed Gometra Fish Farm would largely be screened by foreground topography.

Sequential views of Tuath Fish Farm and the proposed Gometra Fish Farm would also be experienced from the sea, in particular yachts and wildlife cruises going to the Treshnish Isles/Staffa, however, potential impacts would be localised due to the nature of headlands which limit views. Both sites are also viewed against the backdrop of land and would be close to the coastline rather than interfering with the wider seascape.

Potential views from the minor road above /approaching Achleck would be minimal due to the distance between the proposed development and partial screening that takes place from adjacent vegetation and local topography. From this location Loch Tuath would be the most prominent of the fish farm developments.

The two other developments within the NSA at Geasgill and Inch Kenneth, as mentioned are well designed and situated in areas where visual impacts are minimised amongst islands and skerries. However, these locations would not be suitable for a development classed as large-scale, and is contrary to guidance produced by SNH which suggests that large-scale fish farms should be located parallel along regular coastlines in expansive seascapes where the proposed development would not dominate the water surface. SNH also advise that large-scale, open seascapes create expansive setting with a horizontal emphasis which can often 'swallow up' or dominate large structures. It is therefore acknowledging that development can be diminished in scale relative to the expanse of water it is located in. This is true of Loch Tuath which is a fairly long sea loch orientated east to west and at the point of where the proposed development is to be located, fairly broad.

#### **4. Quality of the LVIA/supporting Landscape addendum**

4b) We disagree with the comments made regarding the variation of impact relating to receptors and viewpoint. The viewpoint locations have been chosen by The Scottish Salmon Company (following the screening/scoping response from the Local Council and SNH on 12/1/2012) to represent the general views obtained from that particular location and provide a good representation of the coastline of Loch Tuath.

Viewpoints chosen to represent areas tend to experience a view of the development due to being taken from roads or high points within the landscape. Typically, following best practice, viewpoints are taken from where the landscape is open (i.e. the photomontage would not be taken within a woodland). However, the detailed visual assessment of building/route receptors undertaken by ASH design+assessment Ltd has assessed the various properties found along the B8073 road. Variation of impact is largely down to the orientation of the property, potential screening provided by vegetation and topography and the nature/context of the view that the proposed development would be experienced in.

The properties highlighted in the SNH response found along the B8037 road tend to experience slightly oblique to oblique views of the proposed development. These views are also partially screened by adjacent foreground vegetation /local topography. The proposed development would also not be a dominant feature within the view as the eye is drawn along the coastline east or west along Loch Tuath.

With regard to the photomontages, unfortunately unlike wind farms, there is no guidance currently published with regard to the production of photomontages for fish farms. Following the issue of the LVIA Addendum, ASH design+assessment Ltd have reviewed the photomontages produced by The Scottish Salmon Company and have confirmed that they are happy with the quality and representation of the proposed fish farm with the exception of Viewpoints D and E, for the following reasons:

- Viewpoint D: ASH would expect that the development would be visible to the left of the small boat found in the foreground, but viewed against Gometra. The distance between the viewpoint and proposed development is around 6.2km and would therefore form a very small part of the view; and
- Viewpoint E: ASH consider that this photomontage actually portrays the proposed development worse than it actually is. The proposed development appears to be sitting further out in Loch Tuath and should in fact, be closer to the Gometra coastline.

Since these comments were made The Scottish Salmon Company have revised these photomontages in line with the comments and re-submitted them to Argyll and Bute Council.

d) Assessment of wild land qualities were considered in the LVIA Addendum and were not considered in the assessment for the following reasons:

- The site does not fall within or near a SNH Search Area for Wild Land;
- Northern side of the island includes views of houses, B8073 road on the north bank of Loch Tuath and regular boat activity can be experienced; and
- Presence of man-made elements such as post and wire fencing, access track, animal tracks from sheep, former settlements and discarded equipment.

Although at consultation stage, SNH have attempted to identify relative areas of wildness as indicated in the 'Map of Relative Wildness' which indicates that the island of Gometra is generally Medium in terms of wildness with the access track reducing the perception of wildness. The west coast of the island is considered of being Medium-High in terms of Wildness which would not be affected by the proposed fish farm as indicated in Figure 2: Zone of Theoretical Visibility of the LVIA Addendum.

The LVIA Addendum has reviewed the special landscape qualities as part of the Local Character Impact Assessment.

### **5. Landscape Capacity**

We acknowledge SNH concerns regarding landscape capacity, however, a capacity study is out of the scope of works that ASH were employed and would be the responsibility of Argyll and Bute Council. We also recognise that the proposed development site is located within an NSA which has high sensitivities. However, the fairly regular coastline and wide expanse of sea also lends itself to large-scale fish farm development which as both LVIA documents highlight, impacts experienced would be localised landscape and visual adverse impacts and not significant in the wider area.

### **6. Previous Response**

We have tried to cover the coastal character assessment as part of the identification of Local Character Zones, however, due to time constraints we have been unable to provide a full assessment of the coastal character units and seascape. However, we feel that our identification of Landscape Character Zones address some of these concerns.

We hope that the above answers the points raised in SNH's response.

Kind Regards

Graeme