



**Scottish Natural Heritage**  
**Dualchas Nàdair na h-Alba**

All of nature for all of Scotland  
Nàdar air fad airson Alba air fad

By email to: [centralvalidationteam@argyll-bute.gov.uk](mailto:centralvalidationteam@argyll-bute.gov.uk)

Mr Richard Kerr  
Argyll and Bute Council  
Planning Services  
Whitegates Office  
Whitegates Road  
LOCHGILPHEAD  
PA31 8SY

Your Ref: 12/01176/MFF  
Our Ref: CONS/MFF/AB/Gometra

7 September 2012

Dear Mr Kerr

**Town and Country Planning (Scotland) Act 1997**  
**Proposed Fin Fish Farm, North Gometra, Loch Tuath, Isle of Mull, Argyll and Bute**

I write to provide comment and advice on the revised landscape and visual impact assessment and addendum submitted by the applicant on 22 August and 31 August 2012. These documents were submitted in response to our concerns expressed to you in our letter dated 6 August 2012.

To avoid repetition, only advice on the landscape and visual impacts of this proposal is provided within this letter. All other concerns raised within our previous response letter remain valid and must be considered as part of the determination process.

1 Advice

- The proposed fish farm will have locally significant visual impacts on the Loch na Keal National Scenic Area (NSA). We advise that the development will erode the overall scenic quality and perceived remoteness of this area, contributing to the long term attrition of some of the characteristics and special qualities of this landscape. These affects will however be limited in their extent and are not considered likely to affect the overall integrity of the NSA landscape. We therefore withdraw our objection to this development on landscape grounds.
- We strongly recommend that an Aquaculture Framework is developed for Mull, which is underpinned by and includes consideration of the landscape and visual capacity to accommodate further large scale aquaculture development in presently remote sensitive undeveloped coastal areas, such as Loch na Keal NSA. This framework would help ensure that Mull retains some areas, particularly within the Loch Na Keal NSA which are free of large scale aquaculture development to protect the special qualities of wild seascape and remote coastal landscapes.

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INVESTOR IN PEOPLE

- The additional LVIA and landscape character assessment provided in support of the application is considered adequate enough to enable us to form our own conclusions regarding the development. We advise that both documents contain gaps in information, such as a lack of an appropriate cumulative landscape assessment, and weaknesses in the assessment of impacts from certain viewpoints.

## 2 Loch na Keal National Scenic Area

The development site lies within the Loch na Keal National Scenic Area (NSA), one of only 40 such areas in Scotland. The development represents a very large scale aquaculture development with associated structures and activities, in an area where development should only be permitted where it will not adversely affect the integrity of the area or the special landscape qualities for which it has been designated. The special qualities for which it is designated are found here:

<http://www.snh.gov.uk/protecting-scotlands-nature/protected-areas/national-designations/nsa/special-qualities/>

## 3 Appendix

Our detailed consideration of the landscape and visual impacts of the development proposal, the revised LVIA and addendum documents, and our suggestion for an Aquaculture Framework, are contained within the attached appendix.

In conclusion I confirm that we withdraw our objection to the development proposal.

If you require any further information regarding our position please do not hesitate to contact me at the address above.

Yours sincerely

ANDREW CAMPBELL  
Operations Manager  
Argyll and Outer Hebrides

**Town and Country Planning (Scotland) Act 1997  
Proposed Fin Fish Farm, North Gometra, Loch Tuath, Isle Of Mull, Argyll and Bute**

**1. Landscape**

The proposed Gometra fish farm is large scale, but it will not transform or dramatically change the Landscape, it will however, modify and weaken its character, impacting on some of the Special Landscape Qualities listed for Loch Na Keal NSA (SNH report "The Special Qualities of NSA "), in particular it will have some significant (Moderate) adverse impacts on the following special qualities

"Views of an island studded sea"

"Distinctive seaways and shores "

"A voyage from enclosed sea loch to the open Atlantic"

"Dramatic coast of basalt terraces and cliffs "

We concur with the findings of the LVIA (august 2012) that the installation of the proposed fish farm represents a "medium change ", and represent a "noticeable deterioration" considered as a moderate adverse impact on the above Special Qualities . In the context of the whole Loch na Keal NSA ,however, we consider that these significant adverse impacts are relatively localised and that they cannot therefore be considered to adversely impact on the overall integrity of the NSA , and do not therefore justify an objection .

**2 Visual Impacts**

There will be some significant adverse (moderate ) visual impacts from some key views within the NSA, SNH concur with the findings of the LVIA (Page 20 /21) , that from viewpoint's A, B, E and F (supporting LVIA August 2012) there will be moderate adverse Impacts, with the fish farm representing "a noticeable deterioration" from these viewpoints. SNH consider all these views to be highly sensitive, in a landscape of recognised high scenic quality, where even a low magnitude of change would result in a Moderate impact. SNH however consider these to be localised significant adverse impacts, which will not result in significant adverse impact on the overall integrity of the NSA. This is because of the extent and range of similar important seascape views where the NSA landscape will be experienced from, but the proposed fish farm will not be evident or will be barely perceptible; the large scale diversity and complexity of the land/seascape: and the horizontal nature of the proposed development, which has some compatibility with the horizontal visual emphasis of the island studded landscape. In addition the proposed fish farm will be mostly viewed against the backdrop of the islands, aligned with and close to the coastal edge.

**3 Cumulative landscape and visual impacts;**

It is likely that there will be also be some sequential cumulative impacts on road and recreational users from B8073 as both the existing (Rubha nan Gall) and proposed Gometra , both large scale fish farms, will potentially be visible in sequence from a range of recreational points and on sections of the B8073 viewpoints D and F and surrounding higher ground/footpath routes e.g. from gateway views to NSA/Loch Tuath from minor road above /approaching Achleck.

Sequential cumulative visual and landscape impacts have not been assessed within the supporting LVIA or addendum. Instead a judgement has been made within the LVIA, without any supporting justification or assessment, that there will be no cumulative impacts based on the reasoning that there is a 6km distance between the two fish farms. SNH does not

consider this to be an adequate approach or proper assessment of potential sequential landscape and visual cumulative impacts.

Both the Geasgill and Inch Kenneth (Samalan Island) fish farm sites are well established in this area and are situated to minimise visual impacts upon the area. The Inch Kenneth site nestles between the islands of Samalan and Inch Kenneth, away from the more expansive and unbroken stretches of coastline, such as at Gometra, outer Loch Tuath, where large geometric structures are more difficult to accommodate amid such a convoluted, skerry-studded coastline

SNH advise that because the proposed development is very large and geometric, and located in an area valued for its perceived undeveloped remote and wild land qualities, if this development is approved it will increase the overall impact of Aquaculture development within Loch na Keal NSA and that as a result aquaculture will form a stronger focus within Loch Tuath and its associated coastal landscape.

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

The additional LVIA and landscape character assessment provided in support of the application is considered to be adequate enough to enable SNH to form its own conclusion's regarding the development, but there are gaps in information and weaknesses/some concerns in relation to following aspects ;

a) The potential sequential cumulative landscape and visual impacts have not been assessed. (See above Para 1.4)

b) The very high sensitivity of the landscape and significance of impacts has in some instances been underestimated. For example drawing number 0120406 within the Addendum 'Visual amenity with ZTV overlay' rates the impact for all views as being the same, either negligible or slight adverse. In contrast, experience of visiting the site and viewing the supporting photomontages evidently demonstrates that there is a significant variation in the impact between some views; for example viewpoint D (correlates with B3 on addendum) from which the proposed fish farm would not be visible to viewpoints B, E and F (correlates with F1, B6 and B7 on ASH plan) from which the proposed fish farm is visible. In certain instances we have concerns regarding the reliability of the viewpoint assessment and quality of photomontages. At the Kilninian view (VP E) the impacts are under-rated in the supporting appraisal, where they are described as having a "slight adverse impact" because the sensitivity of receptor is rated as low (SNH consider this should be rated as high), whilst the photomontage in contrast, illustrates a very significant adverse visual impact ,and the fish farm, actual scale of development, appears to have been visually exaggerated. SNH is unsure if this photomontage is correctly representative of the actual scale of the proposed development.

c) The conclusions drawn in relation to Significance of impact in relation to mitigation measures do not follow GLVIA Guidelines.

The LVIA, in relation to its assessment of Landscape receptors (Page 18) concludes that the landscape is high sensitivity and the magnitude of impact is Medium , therefore the overall impact is moderate (significant adverse). It then reduces the impact to Slight adverse when mitigation measures are taken into account. The GLVIA (page 43/para 5.3 section 5 mitigation) states that mitigation should be considered fewer than two categories – primary measures that intrinsically comprise part of the design process, and secondary measures which address the remaining residual adverse effects of the final development proposals. SNH consider that all the mitigation proposed for this development is primary and intrinsic to the design process and development proposal meeting Aquaculture Guidelines. Therefore this is the development proposal which has been assessed in the LVIA, and the impacts

should not therefore be downgraded subsequently from moderate adverse impact to Slight on basis of mitigation.

d) Assessment of impact on wild land qualities and sensitivity in relation to qualities of perceived remoteness has not been properly considered. The LVIA under-estimates /fails to adequately recognise the proposed developments impact/erosion of the perceived remoteness and wildness of the Loch Na Keal NSA.

The LVIA in support of the application states that 'Search areas for wild land' indicates that the proposed development is not near or adjacent to one of these search areas. However it should recognise that one of the important special landscape qualities of the Loch Na Keal NSA is its perceived wild land and remote coastal character, and the Gometra coastal area in particular has a recognised high quality of perceived naturalness and remote wild land qualities.

## 5 Landscape Capacity

Assessment of landscape capacity - in the LVIA a purely quantitative approach is applied in drawing its conclusion that Loch Tuath has capacity to accommodate development proposed. This is a flawed approach and fails to recognise the importance of landscape sensitivities and compatibility of landscape in assessing capacity. SNH consider that the very /highly sensitive Loch na Keal landscape has very limited or no capacity to accommodate significant Fish Farm development, and we recommend a Landscape Capacity study for marine Aquaculture development is carried out for Mull's Loch na Keal NSA and the north coast of the Ross, the sound of Iona and Iona. The primary designated interest of Loch Na Keal NSA arises through the inter-relationship of sea, complex and diverse geology and geomorphology, and the coast and a capacity study would produce guidelines for sustainable economic uses, taking account of the need to protect and maintain the high scenic quality of the coast and seascapes, and sustain special landscape qualities. The proposed development will erode the special landscape qualities and SNH consider a capacity study would assist in making planning decisions which take account of this attrition to landscape arising from development in such sensitive locations, and on the Isolated Coast.

## 6 Previous response

In our previous response SNH recommended that because the proposed development is in a very high sensitivity of the landscape and coastal setting, (NSA) and that the proposed development is large scale located effecting sensitive coastal and remote coastal edge, **SNH therefore recommends that a proper assessment of the coastal character unit impacted on by the development.**

The LVIA and landscape Addendum (August 2012 /Sept 2012) does provide a more detailed LCT assessment, but it fails to recognise the inter-relationship between sea and land and does not therefore provide a proper assessment of coastal character units. This is something that could be properly addressed by a capacity study as recommended above, and would therefore provide a more accurate basis for making judgements about appropriateness of future aquaculture development in Loch Na Keal NSA.