

Archived: 15 March 2017 12:16:12

From: [Alex Turner](#)

Sent: 24 January 2017 13:55:17

To: [Alison Harvey](#)

Subject: Further advice from SNH - Response to additional information submitted by SCC re. ADDs - Portree Outer fish farm - 16/03352/FUL - 24 January 2017

Importance: Normal

Alison

Further to the additional information submitted by SCC on 16 January you requested further comment from us:

Summary

The additional information does not change the position detailed in our response of 7 October 2016. We can provide you with further advice on the particular ADD system now proposed but in order to do so we would require further information from the developer. Based on the information currently available it seems unlikely that the proposed control system is an appropriate way to address the issues we laid out in our previous response. **Please let me know if you require further advice at this stage.**

Additional advice:

We are not familiar with the cetacean triggered control system proposed and could not find any additional information on the manufacturers website. However the noise profile described is similar to the one we assessed previously and suggests that it is just a different control system. In order to evaluate the control system we would need further information on how it detects the presence of cetaceans (including at what distance) and how that controls sound output.

The proposed system does not appear to meet our aim of minimising additional noise inputs into the cSAC. Rather than following the principle of being targeted to sound when seals are present, it appears that this device would sound intermittently most of the time.

The developers commitment to keep accurate records is welcome. SCCs participation in the industry working group is also very welcome and this group will hopefully help shape best practice in the future.

We do not agree that '*There is no consistent, scientific evidence that ADDs of any kind affect cetaceans*'. A number of scientific studies have been carried out in Scotland (including by SNH and SARF) and abroad which indicate that ADDs result in disturbance/habitat exclusion of harbour porpoise. However the evidence varies between studies and is dependent on many variables (e.g. noise characteristics of device, how the device is used, underwater topography, animal behaviour and importance of the area/habitat where the ADD is being used).

We have previously provided you with an appraisal of the impacts of the proposals on the SAC. We disagree with a number of statements in the developers assessment. The fish farm is not '*in the periphery of the SAC*'. The use of ADDs may cause disturbance/habitat exclusion and/or contribute to barrier effects in Sound of Raasay, in combination with existing ADDs. This area has been identified as being an area of higher risk in addition to Sound of Mull.

We recognise that the use/management of ADDs within the cSAC is not a straightforward issue and will require co-operation between the industry, SNH, Marine Scotland and Local Authorities to resolve. However that process will take time and at the moment we consider that ADD use needs to be controlled through planning. The measures that we proposed would allow review and amendments in the future as our understanding develops.

Please let me know if you require clarification or further advice.

Regards

Alex

Alex Turner

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From: Paul Condy [<mailto:Paul.Condy@scottishsalmon.com>]
Sent: 16 January 2017 16:56
To: alison.harvey@highland.gov.uk
Cc: Alex Turner
Subject: 16/03352/FUL - Portree Outer

Dear Alison

SNH made an additional comment on 16th Dec 2016 stating that their original comments have still not been addressed. SSC have made a further response (attached) following contact with our ADD supplier (OTAQ). I have also cc'd in Alex Turner from SNH.

If you require any further information please do not hesitate to make contact.

Thanks

Paul

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