



APRS
The Association for the
Protection of Rural Scotland

Head of Planning and Regulatory Services
Argyll and Bute Council
Kilmory
LOCHGILPHEAD
PA31 8RT

7 July 2017

Dear Sir/Madam

PROPOSED FISH HATCHERY AT LOSSIT POINT, MACHRIHANISH
APPLICATION REF: 17/00642/PP

The Association for the Protection of Rural Scotland (APRS) objects to the above application. The proposed site is not allocated for development in the adopted Argyll and Bute Local Development Plan and so should be refused. This large-scale development would be intrusive and inappropriate within designated countryside and is contrary to a number of key policies and objectives within the Local Development Plan. These include:

- Key Objective E, which seeks 'to ensure the outstanding quality of the natural, historic and cultural environment is protected, conserved and enhanced'
- Policy LDP STRAT 1 Sustainable Development, which states that developers should seek to 'conserve and enhance the natural and built environment and avoid significant adverse impacts on biodiversity, natural and built heritage resources' and to 'respect the landscape character of an area and the setting and character of settlements'
- Policy LDP 3 Supporting the Protection, Conservation and Enhancement of our Environment, which states that a development proposal will not be supported when it 'does not protect, conserve or where possible enhance biodiversity, geodiversity, soils and peat, woodland, green networks, wild land, water environment and the marine environment'. It further states that a development proposal will not be supported when it does not 'protect, conserve or where possible enhance the established character and local distinctiveness of the landscape and seascape in terms of its location, scale, form and design'.

Argyll and Bute's natural environment is of outstanding diversity and quality, the protection of its coastal and marine environments being particularly important environmental issues.

4 Hunter Square, Edinburgh, EH1 1QW
info@aprs.scot 0131 225 7012 www.aprs.scot

President: Colin Prior FRPS Chairman: Charles Millar MA MSc

Director: John Mayhew MA MSc DipTP MRTPI

Scottish Charity No SC016139; Scottish Charitable Company limited by guarantee Registered No 154563

The development site is close to the much visited Machrihanish Dunes and the Gauldrons ('Bay of Storms') and to the Kintyre Way long distance footpath.

The Mull of Kintyre is designated as an Area of Panoramic Beauty and this section of coast is designated as Isolated Coast, indicating its significance in terms of landscape and seascape.

The landscape assessment produced for the applicant shows that the development site covers four landscape character types: Rocky Mosaic; Sand Dunes and Machair; Bay Farmland; and Upland Forest Moor Mosaic. The effect on each landscape will be respectively Medium, Medium to High, Low and Medium. APRS is concerned about these levels of impact, particularly the Medium to High level effect on the Sand Dunes and Machair landscape character type. Machair is only found in North and West Scotland and in the West of Ireland and is recognised particularly for its high biodiversity. Any development impacting on this rich landscape should therefore be discouraged.

APRS therefore requests that this development should be refused and respectfully suggests that the applicant should be encouraged to find a more appropriate site for this development, perhaps on an under-utilised part of the nearby former military airbase which is now the MACC Business Park.

Please contact me if you have any questions about this submission or if you wish me to provide further clarification of any of the points.

Yours faithfully

A handwritten signature in black ink that reads "John Mayhew". The signature is written in a cursive style and is underlined with a single horizontal stroke.

John Mayhew MA MSc DipTP MRTPI
Director