NatureScot
Scotland's Nature Agency
Buidheann Nàdair na h-Alba

Planning and Development
The Highland Council
Tigh Na Sgire
Park Lane
Portree
IV51 8GP

20 December 2021

Your ref: 21/04521/FUL

FAO: Alison Harvey

Dear Alison

**Town & Country Planning (Scotland) Act 1997**
**Proposed improvements at Staffin Harbour; erection of WCs, office, storage sheds, parking spaces, installation of septic tank, diesel fuel tanks and upgrading of existing private water supply. Staffin Boatslip and Breakwater Staffin**

Thank you for your consultation on the above proposal.

**Summary**

- The proposed development lies within Trotternish National Scenic Area which is of national importance for its landscape. In our view the proposals will not have an adverse effect on the integrity of Trotternish NSA or the objectives of the designation. We recommend you consider whether to condition the colour of the sheds and outdoor storage in order to address potential localised effects.

- The development is immediately adjacent to An Corran Geological Conservation Review (GCR) site and Skye Nature Conservation Order (NCO) area which are of national importance for vertebrate fossils and sedimentary geology. These sites will not be affected by the proposals. However, the same rock strata extend into the application area and we therefore recommend a geological watching brief during construction.

**Background**

An EIA Report has been provided with the application, covering both the Staffin harbour development and associated re-opening of Lealt quarry. The Staffin harbour proposals include both marine and terrestrial components. There are significant overlaps and interactions between the regulatory processes for Planning and Marine Licensing. We have sought to provide you with sufficient information to determine this application, including aspects where it is currently unclear whether they will be regulated by Planning or Marine Licencing, particularly the geology of the intertidal and the landscape effects of the breakwater. We will address primarily marine aspects as part of our Marine Licence response, including: effects on porpoise within Inner Hebrides and the Minches SAC; hydrographic changes which may alter sediment deposition/erosion of the foreshore; and benthic habitats.

We provided pre-application advice in April 2021. There have been notable changes to the location and design of the breakwater since then. The project is also much smaller-scale and less industrial than previous iterations of this project (e.g. 2013 or 2015).

The current proposal is to dismantle the existing breakwater and re-use the rock, along with new rock obtained from Lealt quarry, to create a larger breakwater, along with a second slipway and pontoons. There would be an approximate doubling of the size of the hard standing by extending the rock armour onto the foreshore; three 6m x 10m sheds and four 4m x 10m sheds; parking for 40 vehicles; a new harbour office and public toilets. We understand that alternations to the access road have been approved separately.

**Appraisal of the impacts of the proposal and advice**

## 1. Landscape

The proposed development lies within Trotternish National Scenic Area which is of national importance for its landscape. Our assessment of the likely effects on the NSA included consideration of landscape character, visual impacts and effects on the Special Qualities.

### 1a. Landscape character

As stated in the EIA report (13.3.1.3) '*The landscape of the SCH has very strong containment between coastal cliffs and the sea itself. This linear space provides natural screening from the stepped landform above and a sense of security. This is enhanced by the partial shelter afforded by Staffin Island to the north and by the Sgeir nam Foileann (skerry of the gulls) and small headland, Rubha Garbhaig, to the east'.* The EIA Report also highlights the existing access road and harbour development: this proposal represents a modification to an existing feature of the landscape.

The landscape character sections of the EIA Report contains useful information and assessment but focus on the terrestrial landscape character types (LCT) - Smooth Stepped Moorland in particular - rather than coastal LCTs. Staffin bay is mapped as 'Sounds and Narrows' and Staffin Island as 'Offshore Islands' in the Skye and Lochalsh Landscape Character Assessment (1996) but these have not been highlighted or assessed in the EIA Report. The EIA Report suggests that the proposed development includes elements of the Harbour Settlement LCT and we agree that is the case. We have included a brief summary of the key landscape characteristics and key forces for change we consider to be most relevant in Annex A**.**

The applicant has presented a clear design philosophy and is seeking to create visual cohesion and sense of destination/place that is lacking with the current utilitarian harbour facilities. We support efforts to minimise the massing of the sheds, to utilize the sheds to create shelter from the prevailing winds and the use of colour to increase interest. We agree that a thriving, well-managed harbour facility would present a positive landscape image. However, outdoor storage and waste is common around similar sheds and shore bases elsewhere which would present a less positive industrial image that would be inappropriate in this sensitive landscape. **We recommend that you consider whether it is necessary to condition outdoor storage at this site.**

In summary, this proposal will result in a significant modification to the existing landscape character of the area but that effect is well contained and will not have a major impact on the landscape character of the wider NSA.

### 1b. Visual impacts

The Zones of Theoretical Visibility (ZTV) map confirms that this area has restricted visibility from terrestrial viewpoints.

Photomontages have been produced for the key viewpoints as recommended in our pre-application advice. The photomontages are useful and generally appear well rendered, although there appears to be inconsistency in the alignment of the breakwater in relation to the rock outcrops between VP1 and VP2. Lighting is variable with high dynamic range apparent in the photomontages but that is a characteristic of this location. This may also have led to issues with the colour rendering of the sheds (see below).

The assessments of the visual impacts for each viewpoint cover most of the important points and generally appear reasonable and balanced. We do not agree on all aspects – for example while the new breakwater and hard standing relates to the intertidal outcrops it still appears super-imposed and incongruous. We would also have liked to see an assessment of sequential impacts, especially on walkers coming down the path from Garafad. Nevertheless, we agree with the conclusions on impact significance - VPs 2 & 3 will be 'Moderate-Major' during construction and 'Moderate' during operation.

We support the re-use of the rock from the existing breakwater which is already weathered, as well as new locally sourced rock armour comprising similar rock. This will help to minimise visual impacts and assimilate the development into the landscape.

We support the design choice to minimise the scale and mass of the sheds and select designs appropriate to the exposed location. In principle we support using various colours for the sheds to help break up the mass and add visual interest. It is not clear from the application exactly what colours will be used. Some drawings (e.g. the elevation drawings) show more muted colours than the photomontages which show brighter shades. **We support the use of the more muted colours and non-reflective finishes in order to minimise the prominence of the sheds**, helping the development to integrate into the landscape when viewed at distance. You may wish to control this aspect via condition.

We support the use of motion activated lighting in order to minimise light pollution in this rural location.

These proposals are likely to result in significant visual impacts at a small number of viewpoints but these effects are not considered significant at the scale of the NSA.

1c. Special Qualities

The Special Qualities of the NSA are detailed in https://www.nature.scot/doc/naturescot-commissioned-report-374-special-qualities-national-scenic-areas and in the EIA Report. Only a subset of the Special Qualities are well represented in the harbour area:

- **Variations from light to dark across the landscape**

The banding of colours and textures is present in microcosm at Staffin harbour. The pale grey of cliffs contrasts with the varying greens and browns of the grazings, and the dark brown of seaweed on the foreshore at low tide. Those contrasts are amplified by the natural variation in light between areas in the shadow of the cliffs and in sunlight, which varies with time of day and season of year. These variations are apparent in the submitted photomontages. The proposed hard-standing and breakwater will disrupt the dark band of foreshore at a small scale but not sufficiently to affect the Special Quality.

- **Dramatic sea-cliffs of basaltic columns**

Unusually the cliffs here are set back from the coast but retain the characteristic basaltic columns that are a distinctive feature of the NSA coastline. The height of the cliffs and physical separation from the development means neither their setting nor scale will be unduly affected.

- **Distant views over the sea**

The Special Qualities report refers to views across the Minch, to Wester Ross, Rona and Raasay and to the nearby islands of Staffin and Flodigarry. The view from Cadha Riach (VP2) is representative of this special quality. The main impact will be the effect of the enlarged breakwater on the setting of Staffin Island, narrowing the apparent gap between Skye and the offshore island. Wider vistas out to Eilean Flodigarry and out across the Minch, with the shifting patterns of waves, sky and cloud will be unaffected. Views of the distant mountains of Wester Ross will also be unchanged. Due to the screening of the inland cliffs the development is likely to be unseen from most of the Trotternish Ridge. The changes would therefore modify only a part of the middle distance in a restricted number of views. We do not consider this to be a significant effect on the Special Quality.

Overall, the proposals are unlikely to have a significant impact on the special qualities of the NSA.

We conclude that the proposals will not have an adverse effect on the integrity of Trotternish NSA or the objectives of the designation.

## 2. Geology

The proposals are directly adjacent to An Corran Geological Conservation Review (GCR) site and the Skye Nature Conservation Order (NCO) area. These are of national and international importance for the dinosaur footprints; vertebrate fossils and the Jurassic sedimentary rock strata. Dinosaur remains (and other vertebrate fossils) from the Middle Jurassic are rare worldwide. The outcrops at An Corran preserve a section of the upper Duntulm Formation which is missing from the type section at Lon Ostain on the northern coastline of Trotternish. The site interests are well described and the impacts thoroughly assessed in the EIA Report. The information appears to have been collated by a specialist from existing sources rather than as a result of a site survey by a palaeontologist.

We welcome the changes to the location of the breakwater compared to the pre-app proposals. The proposed development is adjacent to the GCR and NCO sites and therefore there should be no direct impacts on these interests. Section 12.5.5 states that '*During the construction of the proposed SCH development, there will likely be direct physical impacts on the immediate area around the existing slipway. This will involve covering the bedrock underlying the immediate area, which includes the Duntulm Formation'*. We have assumed this to mean east of the slipway only since west of the slipway is outwith the development boundary.

As the EIA Report acknowledges, the middle Jurassic-age sedimentary rock layers extend east beyond the GCR/NCO sites, including within the footprint of the development. Section 12.5.1.1 states that '*Some stone removal will take place around the existing slipway, which could potentially uncover new fossil material. Although only one fossil bone has been found from the area immediately around the slipway, it is possible that more are present underneath the existing slipway breakwater and toe*' Given the fact that some of the boulders that make up the existing breakwater came from the beach at An Corran it is also seems possible that these may contain fossils.

We welcome the mitigation proposed in Sections 12.6.1.1 '*It is vital that the Construction of the proposed SCH development does not encroach onto the adjacent An Corran GCR. The presence*

*of fossils in the area will be included in the risk assessment for work on the site. A visual inspection will be undertaken before work commences, and when slipway stone are removed (uncovering underlying rock exposures). Appropriate construction site staff training will be provided to key employees (such as site supervisor) that includes awareness of fossil resources, and information on the Scottish Fossil Code'.* It is not clear from the above whether the intention is for a specialist to carry out the visual inspections and training. **We recommend that a specialist palaeontologist should have a geological watching brief during construction**. Their role would be as detailed above, as well as co-ordinating the measures detailed in 12.6.1.3 in the event that fossils are found.

Indirect impacts are possible due to marine hydrographic changes resulting from the creation of the new breakwater. Changes to rates of erosion, sediment transport and deposition may affect the conservation and visibility of the dinosaur footprints. While the EIA Report states (17.5.2.4 & 17.5.2.5) that the effects will not be significant we have not yet assessed the modelling report in detail and will do so as part of the Marine Licencing process.

In conclusion, there are geological interests of national and international importance adjacent to the site, but these will not be affected by the proposal. Fossils of similar importance could be present in outcrops/boulders within the development area but that risk could be mitigated as described above.

Please let me know if you require any further advice or clarification. The advice in this letter is provided by NatureScot, the operating name of Scottish Natural Heritage.

Yours sincerely,

**Alex Turner**
**Area Officer, Skye and Lochalsh**

[redacted]

**Annex A**

| Summary of text from Skye & Lochalsh Landscape Character Assessment 1996 | Comments on how development proposals for Staffin harbour affect characteristics |
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| **Sounds and narrows LCT** | |
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| **Key landscape characteristics** | |
| Dominance of a linear space, water being 'sandwiched' between opposite land masses. Simple visual composition. Horizontal emphasis. Experiential qualities of land and sea intermingle. Spatial characteristics and dominance of visual elements varies with viewpoint and elevation | Pronounced horizontal emphasis. Linearity of Staffin Island, extensive rock and seaweed on gently sloping foreshore, island cliffs, large band of sky |
| Visual movement tend to be along the linear space or across the water | |
| Land use and activity concentrated along shore. Settlements utilize both agricultural and marine resources. Layout and access routes relate to linear edge | |
| Climatic conditions and aspect. Impact of light at different times of day and seasons of year. | Variations in light are pronounced |
| Land:water edge is dominant element within landscape. People attracted to shorelines. Coastal edge highlighted by tidal banding | |
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| **Key forces for change** | |
| Introduction of new focus can disrupt linear emphasis and distort visual balance | Breakwater is modification to existing harbour but increases visual focus. In low level views linear emphasis is retained. Some disruption from higher viewpoints but still strong horizontal emphasis. |
| Development into water distorts distinct shoreline edge and linear spatial characteristics. Appears more appropriate when it relates to linear space and visual balance of landscape and is an inferior focal element and does not disrupt visual movement. | Breakwater and hard-standing will distort distinct shoreline edge but this is already affected to a smaller degree by existing breakwater. Increasing scale but still an inferior element. Some disruption to visual movement from higher viewpoints but never blocks visual movement. |
| Elements which protrude into the water tend to appear inappropriate unless their location relates directly to their function. Visual impact can be reduced by siting and being inferior in scale. New elements may seem more positive where it appears as a light elegant feature | Location of harbour relates to function. Although this is not a natural harbour it is one of the most sheltered areas on this stretch of coast and this development is adapting an existing facility that has been used for centuries. Siting relates to rock outcrop/skerries and has an elegant sweep though rock armour itself is utilitarian. Shape of breakwater does not mirror the natural outcrop so appears somewhat super-imposed and less harmonious. |
| Increased traffic along shoreline will influence experience of coastal qualities such as vehicles masking sound of waves. Increased activity may conflict with perceived tranquillity. | This is an existing road that already be busy with tourists and visitors to the beach so the development would extend that impact (both spatially and temporally). However activity and |

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| | bustle of a busy port portrays a positive image (see Harbour Settlement LCT). |
| Where onshore developments are in areas with no other buildings they create a dominant focus. Impact minimised when concentrated and avoid visual confusion and negative image created by large yards full of waste or junk. Can appear more appropriate when buildings are designed to relate to other strictures in the landscape, whilst also directly relating to their function and not appearing dominant in scale | The current breakwater, parking and containers are small-scale. This development will not create a new focus but it will increase its prominence. Development is concentrated and external storage/waste could be controlled by condition. Buildings are appropriate to their function and will remain subordinate in scale to the landscape. |
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| **Offshore Islands LCT** | |
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| **Key landscape characteristics** | |
| Islands have a strong sense of place | Staffin Island is used for summer grazing. Its distinctive green, smooth, low-lying character is retained. |
| Perception of islandness is influenced by relationship with neighbouring land and distance of separation. Varies with viewing angle and elevation | Staffin island appears both physically close but inaccessible |
| Where more than one island exists they may form a collective focus | This is true in views from An Corran and Cadha Riach where Eilean Flodigarry is seen in the background |
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| **Key forces for change** | |
| Changes in access can decrease isolation | Separation distance between Staffin Island and Skye is reduced but island still retains its sense of inaccessibility. |
| Development which competes with focal character can affect experience of landscape. New elements should be inferior in scale to the island and concentrated in certain areas, allowing open views. | Although breakwater appears large it does not significantly diminish the scale of Staffin Island due to its linearity and extent of water inside the breakwater. The development is concentrated in one part of the view and open views remain in all directions. |
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| **Harbour settlement LCT** | |
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| **Key landscape characteristics** | |
| Dominated by coastal edge | |
| Contains a concentration of activity, providing constant interest. Typically portrays a positive image of prosperity and is often targeted by visitors | Development would be a concentration of activity. Likely to attract more fishing, work, sight-seeing and recreational boats which in turn is likely to increase the sense of prosperity over the existing under-utilized facilities. Proposals will create a sense of place and destination that the current facilities lack. |
| Jetty or pier typically forms a focus by protruding into the sea across the coastal edge | |

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| Typically a clear and simple visual composition with a direct relationship between layout and function. Buildings possess common design properties despite variety of colour, texture and pattern | Lacks natural spatial containment |
| Rich assortment of experiential characteristics | |
| Transitions to other character types | |
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| **Key forces for change** | |
| Small scale and balance of functions are important - don't allow large scale industrial development to dominate | Design of buildings has sought to minimise the scale of individual sheds and maintain a human scale. Design has sought to create a more distinctive character than the current facilities. |
| Size and design of harbour buildings should relate to function. Present a distinctive character and positive image of a new element. | Design of buildings relates to function - work sheds and an office/public toilets on a smaller-scale |
| Avoid creation of large expanses of open yard space | Yard is large but not excessively so. Minimising tarmac is positive |
| Avoid significant land reclamation. | Extent of reclaimed land is increasing significantly which is not desirable. Greater integration into landscape could have been achieved by siting buildings on adjacent grazing land rather than extending onto the foreshore since the site is unconstrained on the landward side. |