

## **RESPONSE TO SALMAR GENETICS AS DEVELOPMENT PROPOSAL BY RORY PATTERSON, BØMYRA 26, VÅGSTRANDA 6387**

### **References:**

- A. Detaljplan for SALMAR GENETICS AS Vågstranda, Framlegg til planomtale 29.04.2022, Vestnes kommune Planid 1535-0153
- B. Detaljregulering for SalMar Genetics AS, Vågstranda – merknadsvurdering etter offentlig ettersyn ref P1686 of 29.04.2022 (states new 3D photo's made)
- C. Vestnes kommune Reguleringsplan Salmar Genetics Vågstranda Fråsegn til offentlig ettersyn – motsegn ref 2021/54 of 01.11.2021
- D. Reguleringsplan Salmar Genetics AS – Vågstranda Utlegging til 2. Gongs offentlig attersyn PLAN-20/00307-29

### **Introduction**

1. The purpose of this submission is to express my objections to the proposal outlined in the references.
2. In essence the plan submitted by SalMar requires the construction of a large building to a height of approximately 12 metres, plus unknown additional heights for other necessary structures. The proposal also calls for the infilling of a 25 metre section of a 110 metre long beach.

### **Points of contention**

3. Reference A states new 3D images from ground level have been produced. These images do NOT illustrate the impact on the neighbouring properties. For example, the 3D designs do not illustrate the significant loss of views from my property to the east, if this development is allowed to occur. See Annex A. Similar issues likely exist for neighbouring properties.
4. Reference A states that the new height of the building is 12 metres, and that most neighbouring properties are at an elevation of 11.5 metres. My property (194/11) is NOT at this elevation. It is at a low elevation and as such the proposed development has a significant impact on my view, and property value. Additionally SalMars submission states there will be an unknown number of additional structures in excess of this height. Surely the Kommune should not approve a plan that gives such vague information on height of the structure, with corresponding significant impact on neighbouring properties.
5. Reference A acknowledges that SalMar should have engaged with and consulted neighbours on their plan. I ask the Kommune to not approve this proposal until/unless SalMar actually does engage in good faith consultation with local residents. It is of note that it was in April that SalMar stated they should have engaged with local residents; it is now August and SalMar has still NOT engaged with or sought to consult local residents.
6. Reference B states there will be a purpose built recreation area within the friluftsområde. My understanding is SalMar has merely renamed what they previously planned to use as their outdoor lunch/break area. Given there will potentially be a significant number of SalMar employees utilising this so-called friluftsområde, it is unlikely members of the public would feel welcome to utilise this area.

7. It is unclear if SalMar plans to be responsible for the maintenance of this friluftsområde. Furthermore, issues of public liability insurance should be detailed. SalMar states they will provide play equipment for the friluftsområde; who is legally liable if members of the public are injured while utilising equipment provided by SalMar?
8. SalMar's plan includes infilling of the sea. To the best of my understanding, SalMar has not stated why the destruction of this beach area is necessary for their proposed development. A previous discussion with SalMar management indicated that they had no use for this area to be infilled, however they would just try to get it done. Surely the removal of a precious beach zone requires significant justification? Removal of a substantial part of the beach also potentially impacts local wildlife; for example my children have seen juvenile eels and crabs along the shoreline in the area SalMar is proposing to infill. I have also seen sea otters within this area.
9. The proposal significantly impacts my privacy. If the development is allowed to proceed, SalMar should be required to provide a suitable fence/vegetation screen on the border of my property and the proposed development. As highlighted in reference C, privacy concerns should be respected.
10. Reference C states that "The purpose of the planning work is to facilitate further development of the current facilities for keeping broodstock, breeding and production of roe at SalMar Genetics AS in Vågstranda." This is of concern as a previous discussion with SalMar management revealed SalMar plans to open a visitor centre at this facility which would involve a significant number of rigid hull inflatable boat (RHIB) transfers carrying passengers to and from the site. This suggests SalMar has not been forthcoming in its complete plans to the Kommune. Furthermore such a plan would cause significant noise pollution to residents. This directly contradicts SalMar's proposal where they state there would not be an increase in noise pollution. Indeed it is stated the proposal would reduce noise pollution!
11. Reference C further states "The coastal zone along the sea and along waterways has special protection according to Section 1-8 of the Planning and Building Act. It is a national goal that the beach zone should be preserved as a nature and outdoor area that is accessible to everyone in a long-term, sustainable perspective. In the beach zone, special consideration must be given to the natural and cultural environment, outdoor activities, landscape and other public interests." SalMar's proposed development would permanently alter and remove a sizable portion of this beachzone. As such, any approval of this development would be contrary to Section 1-8 of the Planning and Building Act. Additionally, as noted by Statsforvaltaren i Møre og Romsdal, given the current high level of development and destruction of the existing shoreline and beach areas, the remaining open areas become even more important and must be preserved.
12. SalMar proposes that residents may simply swim and use the beach in front of my house (194/11) once their development occurs. Reference C supports my previous submission that the proposed plan would significantly impact on my privacy: "The area that the industry will redistribute from free space to commercial use is the area of the beach which is the furthest from private housing, and which, in this sense, has the greatest value for the general public to stay." Clearly SalMar has ignored the issues regarding beach use and privacy highlighted by Statsforvaltaren i Møre og Romsdal.

This is even more egregious given that SalMar states in Reference A that members of the public can access the beach through my private road and crossing my land: a significant breach of my privacy and potential degradation and destruction of my property. Furthermore, SalMar does not consider that as a private resident, I may choose to fence my property, which would prevent any access to the beach area from members of the public crossing my private property. I find the arrogance of SalMar offensive in that they state an unknown number of people may forevermore utilise my private property simply in order for SalMar to further increase their significant profits. They have done this without consulting me and other residents who own (and pay to maintain) the private road (Bømyra). This attitude displays a complete disregard for local residents and is contrary to reference C which places a significant emphasis on the privacy of landowners, as well as those who wish to utilise public spaces.

13. Reference D states “There has been participation according to pbl., which is the minimum requirement. This is the norm in Vestnes municipality. The municipal director believes that there is always value in talking to affected parties, but this is also one of them questions about resources. Although there could always be more involvement, there is no doubt that the neighbors have been allowed to participate.” I am unsure what “pbl” refers to, however there has been NO consultation with neighbouring residents by SalMar or the Kommune. Frankly, the Kommune stating there is a question of resources is laughable given it is my understanding the Kommune has had multiple meetings on-site with SalMar. Indeed one of these meetings occurred with representatives of Salmar and the Kommune standing on my property, some 20 metres from my house! This suggests the Kommune is only interested in engaging with big-business, not with residents.

14. Furthermore, reference D also states “The sea view will be affected, but not in such a way that it will be completely gone. The municipal director considers this to be acceptable”. On what basis is this statement made given that at no stage has the Kommune engaged with residents? Additionally, the 3D images completely fail to show the impact of the proposed development on the views of the neighbouring properties. I also ask the Kommune to state to what extent the value of my, and surrounding properties should be negatively affected simply to allow SalMar to make even greater profits? Additionally, the Kommune should state to what extent I and other residents should expect our privacy to be impacted simply for a hugely profitable company to make even greater profits? Finally to what extent would the municipal director find the loss of sea views to be acceptable if it was their property so affected?

15. The kommuneplan shows that the area proposed for development is not approved for industrial use. Prior to purchasing 194/11 I ensured that this area was not zoned for industrial use and was reassured by the kommuneplan. On what basis is the kommune ignoring the kommuneplan with significant privacy and negative financial consequences for residents?

16. The height of the proposed building and associated planned development will have a negative affect on my property in a number of ways. These include but are not limited to:

- a. Destruction of the view to the east of my property. This is the most impressive and enjoyable, and therefore I argue most valuable view from my property.

- b. The size and location of the proposed development limits future use of my property by removing options for future developments. These include but are not limited to: flower gardens, vegetable gardens and temporary accommodation for short-term rental income. Historically my property was a small farm and the proposed development would restrict the ability to grow fruit and vegetables on my vacant land due to the nature of the development. This affects the use of my land, with a corresponding impact on its value.
- c. The development may result in an increase in roosting sites for birds, resulting in significant additional avian noise and faecal pollution. The SalMar response stated that the existing flat roof of the Nærbutikken is not a roosting site for birds, however this is disingenuous as the Nærbutikken roof is black bitumen while SalMar is proposing a grass roof. SalMar is comparing apples to oranges.
- d. The infilling of the sea removes a secluded area of beach for people to utilise. By infilling the sea, beach users are forced to use the beach directly in front of my property, affecting the enjoyment of my property by my family and myself. This also affects the value and saleability of my property.
- e. The proposal states members of the public can utilise my private road and cross my private property to access the beach.
- f. Increase in noise and light pollution.
- g. Future loss of profits that can be gained through renting or selling of my property at some time in the future.

## **Conclusion**

17. I object to the proposal on the basis that it:
- a. has a significant impact on the local environment through its height and the infilling of a significant section of beach;
  - b. will significantly impact the enjoyment of my property through the destruction of views;
  - c. will affect the future use options for my property;
  - d. will result in a potential increase in avian noise and faecal pollution with a corresponding affect on health;
  - e. will have a substantial negative effect on the value of my property;
  - f. would result in a loss of privacy; and,
  - g. makes my property less appealing(and valuable) if/when I decide to rent or sell the property.

18. It is unreasonable that local residents should suffer an extreme impact to their quality of life through the approval of the submission as outlined by SalMar. SalMar is proposing the construction of a large industrial use facility in a residential area, which is contrary to the kommuneplan. Their proposal is purely for financial reasons and has not taken into account the impact on local residents. The lack of consultation by SalMar indicates their focus is on profits, not community.

19. Nearly all residents (myself included) of Bømyra have recently spent significant time and money on renovating their properties. This was done to increase the enjoyment of living in our houses and enjoyment of our local environment as well as increasing the value of the individual properties. On what basis should we suffer a dramatic impact on the quality of our life, and major financial impact to our properties purely for SalMar to make even greater profits? If SalMar wishes to proceed with this development, suitable and significant financial compensation should be made to the affected residents.

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Annex:

A. Impact on view for 194/11



View from property currently. Shaded area illustrates the view to be lost by the proposed building.



Impact of the development on my view. Clearly this is a major impact on my property and its value.