

Section	Organisation	Comment	Response
General Comments	Historic Scotland	Welcomes this updating of the existing Local Torridon Framework Plan and considers that it clearly sets out both its objectives and advice on how to deliver these. In terms of our historic environment interests we particularly welcome the advice offered regarding undesignated and unrecorded sites. The clear and concise manner in which this is related should be beneficial to all users of the framework plan and we have recently pointed another local authority to this section as an example of good practice.	Support noted.
General Comments	Scottish Environment Protection Agency	We support this draft aquaculture framework plan and welcome the additional guidance it gives to developers. The guidance is well written and describes the issues really well. It also provides a clear steer on where development will be supported and where it would not. This in turn will hopefully provide greater certainty for developers and other interested parties. The draft plan is fully supportive of recent initiatives that are being promoted by the Scottish Government as well as acknowledging existing planning and other guidance policies.	As an agency which is closely involved with regulation of fish farming and which has a complementary regulatory role to that of the Council, SEPA's support for the plan is appreciated.
General Comments	Scottish Natural Heritage	SNH welcomes the development of this plan and is generally supportive of the objectives it sets out and the policies it promotes.	As a key statutory body, SNH's support for the objectives and policies of the plan is welcomed.

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General Comments	Scottish Natural Heritage	There needs to be reference to the life span of the plan. It would also be helpful to explain the process of review and monitoring.	Text amended accordingly.
General Comments	Marine Scotland	In our opinion the draft Torridon FP is an excellent example of what FP's should be delivering. It conforms to the principles of Marine Spatial Planning providing good, clear map-based guidance as well as providing high-level planning policy advice and generic guidance. It is very clear in its objectives and in particular the area policies are very clear and unambiguous, providing good direction to potential developers.	As a key regulator and statutory consultee in the field of aquaculture, Marine Scotland's support for the plan is welcomed.
General Comments	Marine Scotland	A link to the MS Development portal, Planning page would be useful to include. <a href="http://www.scotland.gov.uk/Topics/marine/Fish-Shellfish/18716/fish-farm">http://www.scotland.gov.uk/Topics/marine/Fish-Shellfish/18716/fish-farm</a>	Appendix added to include various additional sources of information.

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General Comments	Marine Harvest Scotland	MHS feels that this document has a marked negative tone regarding aquaculture and seems to be aimed at limiting aquaculture in the area rather than promoting its sustainable development. The economic contribution aquaculture makes to the Highland economy at large is not recognised in the opening statements of the plan. As this is referenced in the Highland wide development plan, although not as strongly as we feel is appropriate, we feel that this should also be referred to here, not least due to the fact that our Torridon site employs 5 people full time, and 1 part time, and will contribute further to the local economy through indirect inputs such as employment of local tradesmen and accommodation required for site visitors. The omission of this recognition and the lack of implied support of the industry seems to contradict the support given to economic growth by the Scottish Planning Policy.	<p>Much of the text, aside from the policy sections, is generic in line with similar AFPs for other areas e.g. Nevis Plan published Nov 2009. The objectives of the Loch Torridon plan are set out in paragraph 20. First and foremost of these is “promote the operation and development of aquaculture within the plan area which is environmentally sustainable and in harmony with other interests.” This objective supports responsible aquaculture development and it means giving due consideration to other interests in and around the loch.</p> <p>The strategy for the loch supports continued finfish and shellfish farming activity in the areas currently used for this purpose, identifies opportunities for new aquaculture development in less constrained parts of the plan area, and encourages the use of aquaculture consents which are inactive or undeveloped. It seeks to contain the scale of the existing aquaculture operations in Loch Shildaig and Upper Loch Torridon broadly at their current level because they are already at or close to the maximum size which these sensitive areas can assimilate without detracting from the landscape character and qualities which have been nationally designated. The balanced approach which the strategy promotes has been welcomed by most interests in the area.</p> <p>The focus of the plan is the Loch Torridon area. The Highland-wide Development Plan is a more appropriate location for comments on the economic contribution</p>

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General Comments	The Crown Estate	Our general impression is that it constitutes a considered and practical marine aquaculture planning document.	<p>which aquaculture makes to the Highland economy as a whole. The economic contribution of aquaculture to the Torridon area is dealt with in the section headed “Economic Development”. This did not mention the numbers currently employed in the sector only because they are currently quite small and may change significantly over the lifetime of the plan. The Council appreciates the contribution which Marine Harvest’s fish farm operation makes to the local economy of the Loch Torridon area and recognises that this involves both direct employment opportunities and spin-offs for other local businesses.</p> <p>Text of para 46 amended so that the first two sentences read: “Aquaculture generates employment opportunities both on-farm and downstream in processing and marketing. It also helps to generate income for other local businesses which provide support services. Planning policies therefore need to nurture sustainable aquaculture to maximise these benefits.”</p> <p>Support noted.</p>

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General Comments	The Crown Estate	As we have mentioned in previous responses on Aquaculture Framework Plans, we consider that in line with technological and/or market developments, any existing site relinquishments, etc, a holistic overview of aquaculture development in the loch is worth maintaining to accommodate sustainable development proposals that such changes may encourage - polyculture opportunities for example, such that net benefit is derived in terms of the overall sustainability, environmental and socio-economic, of this sector in Loch Torridon.	Support noted.

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General Comments	Scottish Salmon Producer's Organisation	In the Foreword, there is no mention of how important aquaculture is to the economy of the Highlands, nor to the fact that aquaculture is identified as a key sector to achieve sustainable communities in the Vision set out in the proposed Highland Wide Local Development Plan. SSPO has submitted separate comments on the HWLDP Proposed Plan September 2010 and would like those comments to be taken into account when redrafting and amending the LTAFP.	<p>Text of foreword amended to include at the beginning the following paragraph: "Aquaculture is one of the key economic sectors on the Highland west coast and it is increasing in importance as a means of seafood production. The Highland-wide Local Development Plan therefore recognises it as a key contributor to the aim of achieving sustainable communities. Finfish farms and shellfish farms now operate in all the major sea lochs and there is still scope for expansion of the industry. However, there are also other interests around the coast and the natural heritage value of the Highland west coast is high, so aquaculture operations have to be located and managed with care."</p> <p>The HWLDP Policy 51 Aquaculture provides strategic guidance which must be taken into consideration regarding aquaculture planning applications. Whilst supporting sustainable development, the policy also states that, among other things, existing aquaculture sites, wild fish populations, cumulative impacts, landscape character, natural, built and cultural heritage also need to be considered.</p>
General Comments	West Highland Anchorages & Mooring	The framework plan appears very satisfactory to us.	Support noted.

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General Comments	Wester Ross Fisheries Trust	As the industry grows larger and cages become larger, the potential for loss of fish from a single cage being holed increases. There is evidence of farmed salmon spawning in the wild and cross-breeding with wild fish, though as yet the long-term impact of escaped farm salmon on the productivity of wild populations in the West of Scotland, including those around Loch Torridon, is poorly understood.	Comments noted.
General Comments	Wester Ross Fisheries Trust	Wester Ross Fisheries Trust (hereafter WRFT) supports the approach taken in this plan, to provide planning guidance for potential fish farm developers.	Support noted.
General Comments	Royal Yachting Association (Scotland)	Comments submitted in conjunction with West Highland Anchorages and Moorings Association.	Noted.

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General Comments	Wester Ross Area Salmon Fishery Board	<p>The Board endorses the views put forward by the WRFT and strongly supports the presumption against further expansion of salmon farming in upper Loch Torridon embodied in the plan. We would, however, reinforce the WRFT concern that a more precautionary approach is needed for the area as a whole. It is quite clear from the draft that the Council has recognised the actual and potential negative impacts of salmon farming on wild fish populations but it is not entirely clear that the importance of these impacts has been as fully taken into account in the plan as we feel is merited. If, as suggested by WRFT, this is as a result of inadequate data upon which to fully assess and balance the various environmental and socio-economic factors which come into play, then the case for a more precautionary approach would seem vindicated.</p> <p>We nevertheless welcome the draft plan and recognise the process as a serious step forward in aquaculture planning for the area. If the points made by WRFT are taken on board, an extremely valuable development tool will have been created</p>	The Board's comments are noted and addressed through the Council's response to Wester Ross Fisheries Trust.

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Introduction	The Crown Estate	The planning context provided by way of introduction is comprehensive and clear, as are the declared objectives which set out briefly and clearly in our view how proposals for aquaculture development in the loch will fit within a wider context of ambitions for development, heritage, conservation and social interests. This all constitutes a good setting out of the plan's stall, as it were, which is important for prospective developers to understand if they are to make full use of it.	Positive feedback welcome and noted.
Introduction	Scottish Salmon Producer's Organisation	The Introduction should refer to the HWLDP, the Council's Vision and the need to accommodate potential growth in the aquaculture industry in suitable locations. The Council should actively seek information from companies active in the area, and those who could potentially be so, on their plans for development in this area. This would considerably enhance the accuracy, relevance and usefulness of the Plan.	<p>The Introduction sets the scene by describing the area covered by the plan and the aquaculture presence within it. The policy context and the scope for accommodating growth in suitable locations are dealt with in other sections of the plan. The Foreword has been amended to refer to the importance of aquaculture, the HWLDP, and the Council's vision.</p> <p>When it was decided that the Torridon AFP would be revised, all active aquaculture businesses in the area were consulted. This took place several years ago, but due to staffing issues, the draft plan was not completed until 2010. We have since consulted again with the aquaculture industry and the main operators in particular.</p>

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National Guidance	Scottish Natural Heritage	In terms of National Guidance there should be reference to the Water Framework Directive and the West Highland Area Management Plan. These are important documents for maintaining and improving the water environment and set out detailed targets for improvements until 2027.	Text amended to include mention of these documents.
National Guidance	Marine Scotland	The section on Locational Guidelines refers to the wrong website for guidance. The correct web address should be: <a href="http://www.scotland.gov.uk/Topics/marine/science/Publications/publicationslatest/locationalfishfarms">http://www.scotland.gov.uk/Topics/marine/science/Publications/publicationslatest/locationalfishfarms</a>	Text of para 9 amended.
National Guidance	Marine Scotland	Where reference to management areas is made it should be noted that these are fluid and a link to our website maps for the areas should be included. <a href="http://www.scotland.gov.uk/Topics/marine/Fish-Shellfish/FHI/managementagreement">http://www.scotland.gov.uk/Topics/marine/Fish-Shellfish/FHI/managementagreement</a>	Para 9 does state that the classification of the loch may change and a weblink is provided. An appendix of additional websites has been added.

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National Guidance	Scottish Salmon Producer's Organisation	The Highland Structure Plan, the Wester Ross Local Plan and the Proposed HWLDP all make reference to, and contain policies on, the need to support economic growth and diversification, especially in remote rural areas. This is an equally valid contextual reference to those relating to environmental protection, coastal development etc. The fact that the section on Planning Policy Context (pp2-5) makes no mention of the economic sustainability objectives set out in the Council's own strategic planning documents means that the LTAFP appears less than complete and certainly not balanced.	<p>The purpose of the Framework Plan is to complement, not duplicate elements of the Highland Structure Plan or local development plans. There are many policies in these higher-level plans which are relevant to aquaculture in Loch Torridon (e.g. para 17 in the draft plan gives a flavour of this in relation to the Structure Plan) and in the interests of brevity it would not be appropriate to quote all of them in the Framework Plan. It would also be misleading to selectively quote the Council's economic sustainability objectives without reference to its environmental and social objectives as well, since they all form an integrated whole. Readers of the Torridon plan are therefore referred to the development plans themselves. Para 6 in the draft plan refers to sustainability (economic, environmental and social) as the overarching guiding principle for aquaculture development in Scotland and this is promoted at the regional and local level by the Council's terrestrial and coastal plans.</p> <p>To clarify the current position with the Highland-wide Local Development Plan a new paragraph has been inserted between paras 18 and 19 which refers to the HWLDP's overall vision for sustainable development and its policy on aquaculture:</p> <p>"The vision of the HWLDP focuses on enabling sustainable Highland communities, and supporting a competitive, sustainable and adaptable Highland economy by encouraging economic development (e.g.</p>

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National Guidance	Scottish Salmon Producer's Organisation	Aquaculture makes a significant contribution to the Scottish, and Highland, economies as described in more detail in SSPO's comments on the HWLDP. Scottish Planning Policy makes clear statements about how the planning system and planning authorities should support economic growth. However this important factor is not mentioned in the section on Planning Policy Context. There is scope to include comments on this in paragraphs 5, 6, 12, 13, 14 and 15.	<p>via key sectors such as aquaculture) whilst safeguarding our environment. It also focuses on helping deliver a healthier Highlands, providing better opportunities for all and a fairer Highlands. To help deliver this vision the HWLDP provides a positive planning framework to support sustainable development of finfish and shellfish farming."</p> <p>The main accent of the SPP is on sustainable development of coastal areas as a contributor to sustainable economic growth. It acknowledges from the outset that the coast of Scotland has many areas of special landscape and ecological significance. It states that "development plans should identify areas which are potentially suitable for new or modified fish farm development and sensitive areas which are unlikely to be appropriate for such development.... The needs of local communities and other interests should also be taken into account alongside the economic benefits of the sustainable development of the fish farming industry and the operational needs of fish farms." The Loch Torridon plan is consistent with this guidance and it makes reference to the SPP's main thrust in paragraphs 6, 13, and 15. HC is showing its commitment to aquaculture by developing its non-statutory Aquaculture Framework Plans in a time of financial cut-backs.</p>

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Regional/Local guidance	Scottish Natural Heritage	Paragraph 18 refers to the Wester Ross Local Plan. For completeness it would be useful to highlight that the plan identifies the area between the road and the loch shore as locally/regionally important in providing views over open water and as such is given policy protection.	Text amended to include suggestion.
Objectives	Scottish Salmon Producer's Organisation	In the 'Objectives of the Framework Plan' section (p5) there should be greater emphasis placed on the need to accommodate the growth of the industry locally in order to contribute toward supporting sustainable communities as set out in the HWLDP. The priority should be to enable the development of sites for aquaculture in the area as opposed to restricting it by emphasising the protection of natural assets. This is not to diminish the importance of the latter but to try to achieve a reasonable level of balance in the text.	As noted elsewhere, the AFP has to take account of the whole of the HWLDP, not just individual policies in isolation. Whilst the AFP supports some further expansion of aquaculture in Loch Torridon, the existing level of development, along with other inter-linked economic and environmental interests such as tourism and natural heritage, also has to be taken into account. The AFP seeks to accommodate growth of the industry sustainably by guiding development to appropriate locations which are compatible with other interests and by encouraging development at an appropriate scale.

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Scale of Aquaculture Development and	Scottish Salmon Producer's Organisation	In the section on 'Scale of Aquaculture Development and Potential' it would seem essential for the Council to liaise with companies active in the area, and those who may be so, to obtain information so that a balanced assessment can be made between the pressure for development, the need to support sustainable communities and the need to protect the local environment. It would appear that the Plan cannot serve its principal purpose, to guide development of aquaculture in the Loch Torridon area, if such information is not taken into account and fully considered.	When it was decided that the Torridon AFP would be revised, all active aquaculture businesses were consulted. This took place several years ago, but due to staffing issues, the draft was not completed until 2010. The Council has since consulted again with the aquaculture industry and the main operators in particular.
Future Prospects for Aquaculture Development	Scottish Natural Heritage	Paragraph 39 highlights some of the issues which could result from mooring fish cages in more exposed areas. The potential for escapes and the knock-on effects for wild fisheries should be included as one of the issues.	Text amended.
Future Prospects for Aquaculture Development	Marine Scotland	In relation to paragraphs 37 and 38, it should be noted that there may be difficulties with developing cod and halibut farming in Loch Torridon whilst supporting the principle of the current AMA (detailed in paragraphs 106, 107 and 108). The production cycle of these species is longer than that of Atlantic salmon and this could interfere with fallow periods in the loch which should ideally be synchronous.	Text amended to note that such species may not be suitable for Loch Torridon.

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Future Prospects for Aquaculture Development	Marine Scotland	In relation to point 43, it should be noted that whilst polyculture can be positive in terms of reducing environmental impact, it does potentially present an increase to the risk of disease transmission. Shellfish can act as carriers for some infectious diseases and although other species such as sea urchins and seaweed are not known to be susceptible, holding other species in such close proximity presents an unquantifiable risk in terms of disease transmission not only from the cultured species themselves but any epifauna associated with their production. Careful consideration of stocking regimes including sources, movements and fallowing is required before establishing polyculture on a site to ensure the risks of disease transmission are minimised.	Text of para 43 amended (last sentence amended) to acknowledge the need for care to minimise the risks of disease transmission.
Future Prospects for Aquaculture Development	The Crown Estate	We were pleased to see recognition of potential for polyculture in the future. Acknowledgement of the economic and environmental benefits that may accrue from this type of development by the planning authority will be key to its future prospects.	Support noted.

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Future Prospects for Aquaculture Development	Scottish Salmon Producer's Organisation	Given the comments made above, it is clear that the text of Paras. 31–43 would have to change to reflect better the Council’s Vision and its acknowledgement of the importance of aquaculture to the economy of the Highlands as set out in the HWLDP. Equally, the text of these paragraphs would have to change to ensure that appropriate balance is struck between economic, social and environmental sustainability and the need to accommodate development and growth of aquaculture in the Loch Torridon area.	The Council's vision also states, among other things, that it will ensure the special quality of the natural environment in Highland is protected and enhanced. The HWLDP vision and policies are not presented with particular emphasis on one element. Rather they rely on a balance of issues. This is supported by the SPP which advocates aquaculture development in appropriate locations. As Loch Torridon is almost at acceptable capacity, it is not realistic for the plan to suggest that growth can continue unchecked. The plan identifies opportunities for development where aquaculture can grow without adversely affecting other interests.
Planning and Development Considerations	Scottish Salmon Producer's Organisation	Paragraphs 44 – 108 are described as ‘Planning and Development Considerations’. However, some of the matters highlighted are regulated by means other than the planning system and therefore, according to Scottish Planning Policy, ought not to be considered when dealing with planning applications. It is not made clear in the document what are and what are not material planning considerations. Therefore, this would need to be rectified if it is to be useful as a guide to developers, the public, special interest groups and those who make decisions on planning applications. The SSPO has objected to the wording of Policy 51 of the HWLDP on this basis.	This section of the document is background/contextual information not policy. For clarification, the role of the local authority has been clarified in several sections.

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Economic Development	Scottish Salmon Producer's Organisation	The economic contextual information provided in the SSPO response to the HWLDP could be used to inform the references to 'Economic Development' (paras. 44-46).	Text amended. New paragraph inserted between paras 45 and 46:  "At the time of writing salmon farming is still considered to have good growth prospects nationally and there was capital investment of £8m in the sector across Highland in 2009. The Scottish Government currently estimates that for each pound paid to employees in the fish farming sector a further £4-5 is generated in the local economy. Aquaculture generates employment opportunities both on-farm and downstream in processing and marketing. It also helps to generate income for other local businesses which provide support services. "
Water Quality	Scottish Environment Protection Agency	Paragraph 54 describes the anti-fouling properties of copper and zinc. The latter metal is not specifically an anti-foulant but is present primarily to protect metal structure from the effects of salt-water corrosion. Copper is the principal anti-foulant used by the industry. It would be helpful if this was clarified within paragraph 54.	Text amended.

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Water Quality	Scottish Environment Protection Agency	<p>We note the comments in paragraphs 56 and 57. Our stance at present is that shellfish farms should be located within shellfish designated waters. We note the document states that small scale shellfish developments would be favoured outwith the Upper Loch Torridon area although overall potential for shellfish farming is limited within the plan area.</p> <p>If we were consulted on any shellfish proposals outwith the designated area of Upper Loch Torridon, we would also need to ascertain if there were any significant discharges currently or proposed. For example, in addition to the Scottish Water Torridon septic tank there are number of private discharges at Inveralligin. We don't hold info on all existing discharges but we can advise on discharges that we regulate. Therefore in paragraph 57 you may wish to add SEPA as consultee when assessing the presence of existing discharges.</p>	Comments noted and para 57 text amended to include reference to SEPA as a consultee.

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Water Quality	Scottish Environment Protection Agency	<p>It would be useful if paragraph 50 made direct reference to supporting the objectives of the Water Framework Directive (WFD) through the implementation of the Scotland River Basin Management Plan. Perhaps the following text or similar text could be inserted after the second sentence in section 50.</p> <p>4.2 “The Water Framework Directive seeks to secure good or high ecological status for all waterbodies. This is achieved through the implementation of the Scotland River Basin Management Plan including the West Highland Area Management Plan which covers Loch Torridon. Each planning application will need to demonstrate that it will not adversely affect the ecological status of Loch Torridon”</p> <p>.</p>	Text amended as suggested.
Water Quality	Scottish Natural Heritage	<p>Paragraph 53 refers to some of the techniques being used to administer sea lice treatments. The use of well boats should be included within these techniques.</p>	Text amended.

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Water Quality	Marine Scotland	<p>The Loch Torridon area has been the focus of considerable research on sea lice by Marine Scotland Science. Farms have been shown to be a more important contributor than wild fish to the total lice in the environment (Penston &amp; Davies 2009) with the number of lice in the water column being related to the number of lice on the farms (Penston et al. 2008). Furthermore, wind-driven transport from the farms (Amundrud &amp; Murray 2009) leads to high concentrations of lice in areas where sea trout congregate after entering the sea (Middlemas et al 2009). The number of sea trout caught in Loch Shildaig with lice levels above a critical threshold level is also known to be higher when the farms within the Torridon AMA are in their second year of production compared to the first year (Middlemas et al. 2010).</p> <p>While the farmers in the area have generally been successful in decreasing the levels of lice on the farms (Penston et al 2008), there have been exceptions, such as 2007, where synchronous fallowing appeared to breakdown and large number of lice were present on the farms (Penston &amp; Davies 2009).</p>	Up to date research data welcome. Compare this information with the comments SSPO submitted on para 52 in the 'Water Quality' section of the draft plan.

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Water Quality	Marine Harvest Scotland	MHS fully supports SSPO's comments regarding the approach of the bulk of the framework plan, including comments relating to paragraphs 44 -108 and particularly those regarding paragraphs 52-54 & 71. There are serious concerns about confusion which could be caused by incorporating issues which are regulated by other agencies into the planning process.	Text amended - see responses to SSPO's comments.
Water Quality	Marine Harvest Scotland	The sections regarding the impact of sea lice, lice treatments and medicines fails to mention that the impacts of these are already highly regulated by SEPA and MSS. The failure to mention this implies that they are either unregulated or will fall under the consideration of the planning process, both of which are inaccurate.	Text in para 51 states SEPA's responsibility to monitor medicines, therefore sea lice control: MSS added for further clarification.

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Water Quality	Scottish Salmon Producer's Organisation	The statement in Paragraph 52 concerning the impact of sea lice from farmed salmon on wild fish is ill informed and therefore inaccurate and unbalanced. While some special interest groups imply that the decline in wild salmon and sea trout on the west coast is due to salmon farming, others, basing their opinion on scientific evidence and statistics, can clearly demonstrate that the decline is driven largely by global climate change and that the documented pattern of decline in catches across the North Atlantic and on the east coast of Scotland (where there are no salmon farms) and on the west coast (where there are) is identical. SSPO would wish to see this sentence deleted or amended taking the above into account to provide the required level of balance.	<p>Based on a variety of scientific papers as shown in the appendix, the information in paragraph 52 remains. In the interest of clarity however, the last part of paragraph 52 has been amended and additional references and detail have been provided. The last sentence has been deleted and replaced with the following: "Large concentrations of caged salmonids are sometimes associated with larger than normal quantities of sea lice. They have therefore been implicated as one of the factors in the decline of wild salmon and sea trout on the west coast. The risk of adverse impacts varies from site to site but it appears that wild salmon are most at risk in long fjordic systems where they have to pass several fish farms during their migration to sea."</p> <p style="text-align: right;">See also the comments submitted by MSS on the 'Game Fisheries' section of the plan. These provide results of recent research on sea lice levels in Loch Torridon.</p>

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Water Quality	Scottish Salmon Producer's Organisation	<p>In paragraph 53, it is not only 'game fishing interests' that recognise the importance of medicine to control sea lice.</p> <p>The salmon farming industry as a whole understands this issue very well and that, of course, it is not just about medicine use. It is also about integrated management, using all of the available products and technologies to minimise impact in accordance with the industry Code of Good Practice and the requirements of the relevant regulatory bodies. SSPO would wish to see this sentence deleted and the rest of this paragraph amended to include more accurate information on the matter to provide the required level of balance. SSPO would wish in particular to see any reference to 'concerns' removed, unless these are backed up with scientific evidence, are actually proven and are accepted by Highland Council as factually based. Given that the impact of sea lice and the use of treatments are regulated by SEPA and MSS, it should be made clear in the text that this issue is not one which need be taken into account in handling planning applications.</p>	<p>The text has been amended to clarify the roles of licensing sea lice parasiticides. Additional references re potential impacts on non-target organisms e.g. bio-accumulation in shellfish have been added. Additional information has been added to update and amend the text on methods of parasiticide use by the fish farming industry.</p>

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Water Quality	Scottish Salmon Producer's Organisation	In the same paragraph, it should be stated that lice medicines can be administered through the use of well boats. In terms of the effectiveness of sea lice treatments, the statement in the paragraph commencing, 'For sea lice treatments to be effective.....' is ambiguous. SSPO believes that SEPA should license medicine use in such a way as to accommodate the needs of the site and the permitted biomass. SSPO does not agree that the biomass on the site should be limited in accordance with the amount of medicine consented for the site, i.e. SEPA's 'limiting factor approach'. Given that these matters are regulated by SEPA, it should be made clear in the text that this matter need not be considered as part of a planning application.	See previous comment.

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Water Quality	Scottish Salmon Producer's Organisation	Paragraph 54 – All anti-foulants used on fish farms are specifically approved for aquaculture use by SEPA. SSPO member companies comply with all regulatory controls and follow best practice, as set out in the Code of Good Practice, in the use of any chemical treatments. The statements in this paragraph need to be balanced with statements to this effect in order to provide a reasonable degree of balance. On this basis the statement on the Council's 'alternative methods' is inappropriate, as it is not based on scientific evidence of harm arising from the use of already well regulated and approved treatment methods. It should be made clear in the text that this is a matter regulated by SEPA and therefore not an issue for consideration in any planning application.	Text clarified and additional references provided; see previous comments. As acknowledged in the Scottish Marine Atlas (2011), the effects of trace metals from fish farms are not currently monitored therefore effects or lack thereof cannot be currently determined.
Water Quality	Wester Ross Fisheries Trust	The Shieldaig Project data set demonstrates that sea lice larval densities and infection levels on wild sea trout returning to the Shieldaig River have peaked during the second year of the production cycle within the loch (see Shieldaig Project reviews). The AMG has made progress in reducing lice levels and problems for wild fish. However, a risk of future epizootics remains and, given other factors being equal, will increase in proportion to the number of farmed fish within the loch, unless on-farm sea lice management improves correspondingly.	Comments noted. The roles of the various agencies have been clarified in the document. Thus, issues regarding sealice at the individual planning application level will be dealt with by Marine Scotland Science on a case-by-case basis and also by examining the carrying capacity of the whole loch.

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Water Quality	Wester Ross Fisheries Trust	Sea lice infection pressure relates to the numbers of lice per fish (c. targets set in the Aquaculture Industry's Code of Good Practice) and the number of fish. As the number of fish on a farm and in an area increases, the sea louse population at any given 'lice per fish' level increases proportionally. And so does the infection pressure in surrounding waters. Although Appendix 1 'Consented aquaculture sites' provides details of existing consents, there is no table outlining the existing consented biomass within the loch. Biomass may also be of more importance than surface area for other aspects of the ecology of the loch.	Comments noted. Biomass issues are dealt with by SEPA and MSS on a case-by-case basis as noted above. The consented biomass for each of the fish farm sites in Loch Torridon has not been included in Appendix 1 because it is information which may go out of date more quickly than that for permitted gear and it is outwith the scope of local planning authority control.
Water Quality	Wester Ross Fisheries Trust	WRFT is therefore concerned about any overall increase in the biomass of farmed salmon within the loch. We would seek an upper limit for the total biomass of farmed salmon to be grown in the loch. If this is a job for SEPA, then the aquaculture planning system could usefully move towards more co-ordinated planning guidance. Following on from paragraph 7 above, this could be adjusted in light of new information clarifying threats and risks from farm salmon biomass to wild fish populations.	See previous comment.

<b>Section</b>	<b>Organisation</b>	<b>Comment</b>	<b>Response</b>
Predator Control	Scottish Natural Heritage	Paragraph 63 refers to the use of ADD's. SNH considers that ADD's should always be used intermittently and recommends that the opportunity is taken to promote such use as best practice.	Text amended.
Predator Control	Marine Scotland	Does the document miss the potential to provide clearer guidance on some specific planning issues that are spatial in nature? E.g. 63. can we not provide developers with a view for the specific area on whether seal scarers are likely to be acceptable? Or 87. Whether sub-surface lighting is likely to be approved in all / any areas? Developers would find this useful in the context of deciding where to expand to.	The Council relies on expert input from SNH and MSS regarding the acceptability or otherwise of using seal scarers on specific sites. Thus far, the information coming forward from these organisations has not lent itself to spatial policy zonation. The general siting and design guidance for aquaculture, which will be published soon by SNH, will include some guidance on sub-surface lighting. Such lighting is unlikely to be a significant issue unless there is likely to be a conflict with navigation, nearby residences or the use of the coastal area as a wilderness recreation zone or wildlife sanctuary.
Predator Control	Scottish Salmon Producer's Organisation	Para. 64 – The use of ADD's is also an important first line of defence against seal attacks on salmon.	Text amended accordingly.

<b>Section</b>	<b>Organisation</b>	<b>Comment</b>	<b>Response</b>
Predator Control	Scottish Salmon Producer's Organisation	Paragraph 61 – The text should refer to the considerable stress suffered by fish during and following predator attacks and that the significance of such attacks is considerably more for them than the damage to nets is for the companies.	Text amended.
Predator Control	Scottish Salmon Producer's Organisation	Para. 63 – It is not made clear by whom the use of ADD's, as described, is preferred. This should be made clear. The use of ADD's is licensed and any impact on protected species is regulated by SNH; therefore, the text should make clear that this should not be taken into account in dealing with planning applications.	As the local authority has a biodiversity duty, it would have to consider any potential impacts on protected species. This consideration would be assisted by expert advice from SNH. The text has been amended for clarification.

Section	Organisation	Comment	Response
Predator Control	Scottish Salmon Producer's Organisation	<p>Para. 66 – The statements in this paragraph regarding seals are ill-informed and misleading. Seals are highly mobile and will move long distances from their haul out sites to feed. Seal numbers are also so high in some places that they exceed the carrying capacity of the local environment, having depleted local stocks of feed species. In many cases, seals have established themselves where fish farms have been located. In other cases, seal haul out sites and fish farms exist within the same loch without there being a significant predation problem. SSPO member companies seek to use all non-destructive methods of deterring seal attacks on farmed fish. However, as a last resort, good husbandry practice, and the industry's obligations under the Animal Health and Welfare (Scotland) Act 2006 may require the use of lethal action on seals. This is an issue dealt with through the licensing regime and therefore is not a matter that need be considered as part of a planning application process.</p>	<p>Along with the protected status of marine mammals, the Council has a Biodiversity Duty to consider potential impacts on seals. The text has been amended to clarify this.</p>
Predator Control	Scottish Salmon Producer's Organisation	<p>Para. 62 – ADD's and Seal Scarers are the same thing. The reference to ADD's 'annoying' seals is inaccurate.</p>	<p>Text amended to read: "Seals may be deterred by the use of Accoustic Deterrent Devices (ADD's) i.e. seal scarers."</p>

<b>Section</b>	<b>Organisation</b>	<b>Comment</b>	<b>Response</b>
Industry Codes of Practice	Scottish Salmon Producer's Organisation	Para. 71- SSPO welcomes the fact that Highland Council is fully supportive of the aquaculture industry Code of Good Practice for Scottish Finfish Aquaculture (CoGP) and other standards. The UK aquaculture industry is already the most regulated food production industry in the world and the CoGP underpins the current Scottish regulatory framework. In this context, it is irrelevant for the Council to seek the imposition of additional regulatory burdens on the industry. The statement also does not make it clear how such a requirement could be enforced and by whom.	Whilst the industry Code of Good Practice makes a useful contribution to maintaining standards, it is only voluntary and not all operators are members of the SSPO. If the standards it requires are willingly accepted by all the industry then the industry should not see them as a regulatory burden. So long as the code remains voluntary, responsibility for monitoring compliance and enforcement rests with the industry itself.
Inshore Fishing	Scottish Natural Heritage	Paragraph 77 refers to the award of the Marine Stewardship Council's Sustainability Label to the Torridon Nephrops Management Group. The plan needs to provide an up-to-date position with respect to this as it is our understanding that there are ongoing problems in controlling the level of fishing effort within the closed area and that the label is therefore under threat.	Now that SNH have provided this information, further checks were made and the text amended as appropriate.

Section	Organisation	Comment	Response
Landscape and Visual Amenity	Scottish Natural Heritage	<p>Paragraph 79 refers to the scenic qualities of Loch Torridon. SNH has recently completed work to identify and describe the scenic qualities associated with the 40 NSA's across Scotland and it would therefore be useful to include reference to this work here and to those scenic qualities found specifically within the area. Reference to these scenic qualities should also be included in those sections focusing on the characteristics/constraints of different locations. Full details can be found on our website.</p> <p><a href="http://snhwebsite:8090/protecting-scotlands-nature/protected-areas/national-designations/nsa/special-qualities/">http://snhwebsite:8090/protecting-scotlands-nature/protected-areas/national-designations/nsa/special-qualities/</a></p>	Text amended to include reference to SNH's work on the special qualities of NSA's and to include the relevant website details in the bibliography.

<b>Section</b>	<b>Organisation</b>	<b>Comment</b>	<b>Response</b>
Landscape and Visual Amenity	Marine Harvest Scotland	The document lists examples of infrastructure such as feed systems & anti-predator measures, but does not give any information regarding whether there is a preference about their use. The infrastructure mentioned is as used currently, but as technologies evolve and improve we will wish to adopt them. Is the current list of equipment all that will be considered for future development of the site, or will advances in technology be considered as well? There is no suggestion of what would be preferred in the area or of why the equipment listed has been mentioned.	Paragraphs 81, 82, 85 and 86 explain how aquaculture installations can impact on the landscape and how this impact can be managed. The framework plan does not however assume that fish farming technology will stand still. The descriptions given of current equipment which, individually or cumulatively, may have a significant visual impact is therefore not intended to be exhaustive and it is accepted that designs may improve. The principles of good fish farm siting and design are dealt with in the generic guidance published by SNH. The detail of fish farm design is best dealt with in the context of individual planning applications. Now that developers are beginning to engage in pre-application discussions, there is a greater chance to assess new equipment before it goes on site, hopefully prior to the developer investing in it. Equipment configurations are assessed on a case-by-case basis as not all equipment is appropriate at all sites.

Section	Organisation	Comment	Response
Landscape and Visual Amenity	The Crown Estate	<p>We consider that with respect to visual impacts on the character of the Loch Torridon landscape: the consenting or otherwise of high capacity barges which may be integral to a development that is acceptable in other respects might be more negotiable on the basis of sympathetic design appropriate to the location? We acknowledge that industry has not proved particularly imaginative in this regard, but there are now designs which may look more ‘vessel-like’, for example, and/or have an appearance which is less detracting from local landscape. It is an element of equipment design and use that might have to be encouraged by planners, as sympathetic cosmetic design, such as the breaking up of hard lines and angles, coloration, etc. may not necessarily compromise function, and therefore developers could be offered the opportunity to submit design options.</p> <p>We do not feel that the use of high top nets above large circular cages should in themselves be a material consideration, but be addressed in the context of the whole development’s nature. Top nets for larger cages will require greater centre heights in order for them to effectively fulfil their function and so their appearance will be integral to this, as opposed to being a design issue, and we do not see this as a notable visual amenity issue compared to the presence of the farm as a whole anyway. It may well be that the visual impact of fewer, larger cages is worth the compromise on higher top nets, depending on the circumstances?</p>	<p>With the increase in pre-application discussions regarding individual applications, it is more likely that developers will come forward at an early stage to discuss proposed new equipment designs. However, it should be noted that not all equipment is appropriate in all locations and therefore it needs to be considered on a site-by-site basis. Issues such as topnets are considered as part of the overall impact on a site, not in isolation, in the same way as a roofline is considered as part of a building in a terrestrial planning application.</p>

Section	Organisation	Comment	Response
Nature Conservation	Scottish Natural Heritage	Paragraph 94 refers to European Protected Species. Otters are also European Protected Species	Text amended.
Nature Conservation	Scottish Natural Heritage	<p>Paragraph 89 to 93 provides a general overview of the nature conservation interest of the loch. There is further specific information collected as part of the Marine Nature Conservation Review and other surveys. It may be helpful to make reference to this information and the places they can be sourced i.e. MarLIN, MESH and Sea Search websites as this information will be important in determining responses to specific proposals.</p> <p>It would also be helpful if there was reference to the work SNH is undertaking on behalf of SG to identify those habitats and species of greatest conservation importance in territorial waters, Marine Priority Features (MPF), since these will be used as the basis for focusing future marine conservation action as well as being important in determining responses to specific proposals. Full details can be found on our website.</p> <p><a href="http://snhwebsite:8090/protecting-scotlands-nature/safeguarding-biodiversity/priority-marine-features/">http://snhwebsite:8090/protecting-scotlands-nature/safeguarding-biodiversity/priority-marine-features/</a></p>	Text amended. An additional appendix of further sources of information has been added.

Section	Organisation	Comment	Response
Game Fisheries	Scottish Natural Heritage	Paragraph 106 refers to the Tripartite Working Group process. It is our understanding that this will cease from March 2011. Although future arrangements for engagement and consultation are uncertain it would be useful to provide some reference to the proposals that are currently under discussion and to put the Council's recommendations within this context.	Text amended to reflect this.
Game Fisheries	The Crown Estate	We are delighted to see the acknowledgement of and suggestions for compromise and co-operation between various marine use and development interests in sustainable exploitation of available resources in Loch Torridon, particularly aquaculture and fishing sectors. In this regard, we also support the recommendations for Area Management Agreements, although to have these placed in the public domain may be somewhat ambitious in our opinion, at present anyway. However such 'co-existence' relationships are integral to successful marine planning outcomes, and their encouragement is welcomed.	Comments noted.

Section	Organisation	Comment	Response
Game Fisheries	Wester Ross Fisheries Trust	The plan is well drafted and readily understood. WRFT welcomes the assessment of game fisheries and populations on page 23, including the section relating to the TWG, and supports the view of the Council that the Area Management Group would be strengthened with wider participation of stakeholders.	Support noted.
Draft Policy Map	West Highland Anchorages & Mooring	We are presently in discussion with Crown Estate and the new Shialdaig moorings association to try to ensure the provision of anchoring space off Shialdaig village after the present proposals are complete. Thus an anchorage symbol would be appropriate there behind the island and approximately opposite the jetty.	Policy map amended to include anchorages further to its inclusion in the Clyde Cruising Club guide for Ardnamurchan-Cape Wrath.
Draft Policy Map	West Highland Anchorages & Mooring	Access to Ob na h' Acaresid for anchorage has been obstructed by fish farm feed pipes. It has been agreed with Lighthouse Caledonia to have them moved. If this is not completed soon the anchorage will remain obstructed and this would be 'unfortunate'.	Comments noted; it is hoped that the obstruction will be moved as soon as possible.

<b>Section</b>	<b>Organisation</b>	<b>Comment</b>	<b>Response</b>
Draft Policy Map	West Highland Anchorages & Mooring	The anchorages in Ob Gorm Mor and Beag are inaccessible due to well established shellfish farms. The symbols in them should be removed if they exist and the anchorages deleted from your text. The editors of CCC directions and Imray Laurie directions are aware of this.	The configuration of this site has been an issue raised by Highland Council for a number of years, but prior to planning control. It is hoped that the SG review of aquaculture sites may resolve this issue. Text of para 99 amended to remove references to Ob Gorm Mor and Beag as existing anchorages. However, the potential for their reinstatement as such as is retained in the policy for area 'E' which has not been changed in this respect.
Draft Policy Map	West Highland Anchorages & Mooring	An anchorage symbol should be inserted east of Dubh Aird and close to Annat but well clear west of the maerl beds. This anchorage is well used by sailors and provides very good shelter.	Policy map and text amended in accordance with suggestion.

<b>Section</b>	<b>Organisation</b>	<b>Comment</b>	<b>Response</b>
Area Policies	Scottish Environment Protection Agency	One Page 36 you state “The existing fish farm at Camas an Leim has seen successive phases of expansion and is considered to be at its maximum acceptable size”. We have recently been consulted on a screening and scoping for a planning application (10/03954) where the applicant is proposing a 128% expansion. Our initial assessment of the proposals is that we are unlikely to have any concerns with this proposal. We recommend you take account of any recent development management consultations and advice from other statutory consultees to ensure the statement on page 36 is up to date.	The recent (2010) planning application at this site was for an expansion of the mooring area only, not the visible cage surface area. It will therefore will have little or no additional visual impact which is the Council's main concern in relation to any proposals for further expansion of this fish farm. The regulation of fish biomass is primarily the concern of SEPA and MSS.
Area Policies	Scottish Natural Heritage	Given the characteristics and constraints of Area H, and the fact that any further expansion of aquaculture involving surface gear would tend to detract from the scenery and the popular coastal tourist route around Applecross, we would recommend that the policy for this area should be the same as that for Area G, i.e. aquaculture operations should not be expanded beyond the existing consented levels.	The fish farms located in this area at the time of writing are moderate in scale and likely to remain so because of the amenity and navigation considerations identified. The Council believes there are sufficient provisos within the policy to guard against overdevelopment here.

Section	Organisation	Comment	Response
Area Policies	Scottish Natural Heritage	<p>On page 36 the area policy for Area E states that the site at Camas an Leim is considered to be at its maximum acceptable size. Although the reason for this is set out in preceding sections of the plan this policy statement needs to be qualified so as to avoid any uncertainty or ambiguity.</p> <p>There is a presumption in favour of small to medium scale aquaculture installations in zone E but as the characteristics/constraints section states this section of the loch is comprised of a series of inlets, bays and headlands and the coastline could become ‘blocked up’. The widest bay includes the mouth of the R Balgy which historically was an important salmon river. As such constraints are likely to affect the ability to realise the policy as it currently reads.</p>	The policy presumes in favour of installations which are, among other things, well-spaced and sensitively located. This proviso would tend to preclude finfish farming or large-scale shellfish farming in the bay near the mouth of the River Balgy.
Area Policies	Scottish Natural Heritage	<p>Within area F, the area to the south of Loch Shieldaig has been identified by the community as an area to develop for public moorings.</p>	Text amended in para 129 to mention this.

<b>Section</b>	<b>Organisation</b>	<b>Comment</b>	<b>Response</b>
Area Policies	Marine Scotland	Policy area 'E' refers to aquaculture (potentially including finfish) being acceptable. Note there may be issues relating to the proximity of the River Balgy and interactions with wild salmonids.	Comments noted. Without clearer guidance from MSS on what these issues are and how the area policy should be tuned to take account of them, the Council must work with what it has. The area policy as it stands presumes in favour of aquaculture installations which are well-spaced and sensitively located. This would tend to militate against the siting for a salmon farm close to the Balgy. The Council considers the fish farm installation at Camas an Leim to already be at its maximum acceptable size in terms of visual/landscape impact.
Area Policies	Marine Scotland	Right up front in the document 32 / 34 it is made fairly clear that there is limited expansion potential for finfish. It also states that the sites are quite close together (34) which they are certainly not compared to other areas in Scotland. We had to get to near the end of the document to find out why there was such limited potential for expansion (109 refers to it being primarily visual impact issues). This should be highlighted when talking about limited expansion potential.	The current finfish sites are relatively closely spaced in relation to the area of Loch Torridon as a whole i.e. they are all within a five mile stretch in the middle reaches of the loch system. Paragraph 31 in the draft plan explains why the scope for further major expansion of finfish farming is fairly limited. The section on Planning and Development Considerations goes on to provide further details about other interests in and around the loch which have to be taken into account.

<b>Section</b>	<b>Organisation</b>	<b>Comment</b>	<b>Response</b>
Area Policies	Marine Scotland	The policy areas each have presumptions against or in favour of fish or shellfish farming developments. Would it be possible / useful to show these areas by shading on the plan so developers can quickly see where each development type may be acceptable?	As there are differing levels of potential development which may be acceptable between shellfish and finfish, shading of the map may lead to confusion. Each actual policy area is clearly marked, along with a short policy statement for each.
Area Policies	Marine Harvest Scotland	The plan recognises the approach taken by MHS to focus on developing high- performing sites, such as Camas an Leim. This has been a successful approach and one that MHS intends to continue. Long-term presumptions against further development of sites will handicap the ability of the sites to perform, endangering the long-term future of the site, and the local employment.	As a commercial operator Marine Harvest's desire to maximise production on its sites is understandable. However, the technical capacity of a site for growing fish is not the only criterion and high performance in production terms does not mean that all other considerations should be ignored. Limits may be necessary to avoid overdevelopment and in the case of Camas an Leim, which has seen several phases of expansion, the reasons for controlling the scale of the installation have been stated on numerous occasions.

Section	Organisation	Comment	Response
Area Policies	The Crown Estate	<p>On the whole we agree with the broad terms of the strategy for aquaculture, and we are pleased to note the identification of further potential opportunity, subject to appropriate technology and nature, as well as the encouragement for resumption of use of consented but inactive sites.</p> <p>We are by and large are in agreement with the proposals made for the individual policy zones. While recommendations for small or medium scale development opportunity in our opinion reflects the scope for the activity more so than necessarily any associated business viability as such, we appreciate the difficulty in planning for a combination of such aspects without developer input.</p>	Support noted.
Area Policies	Wester Ross Fisheries Trust	Policy for area 'F' - WRFT agrees.	Support noted.
Area Policies	Wester Ross Fisheries Trust	Policies for areas 'H', 'I' and 'J' (continued) - How many seals are there in the outer part of the loch ? Use of seal scarers where cetaceans are more prevalent may not go down well with wildlife tourism operators, and without scarers, holed cages might be more likely.	Being transient species, accurate seal count data is not currently available to HC. As noted by SNH, the use of ADD's would be more acceptable if only the intermittent type were used.

Section	Organisation	Comment	Response
Area Policies	Wester Ross Fisheries Trust	In summary, WRFT would not support locational guidance policy that promotes any overall increase in farm salmon production within the Loch Torridon Area without a more robust assessment of the potential cumulative impact of existing and potential developments upon the wellbeing of wild fish populations within the area.	<p>The cumulative impact of existing and proposed developments on natural resources such as local wild fish populations should be a consideration in dealing with any application for a new or expanded fish farm. There is a need to ascertain what levels of impact are likely or possible for the given set of management parameters associated with the proposed fish farm operation (e.g. the scale of operation, the measures which will be taken to treat sea lice and to prevent escapes etc) and the level of acceptable risk associated with this has to be gauged accordingly.</p> <p>The Council relies on the experts in Marine Scotland Science, SNH and the Fisheries Trusts to make this judgement and for them to advise the Council, as planning authority, accordingly. If they speak with one voice it makes the Council's job easier. A robust assessment of potential impacts and risks is likely to require agreed methodologies, a suitable programme of research and a co-ordinated approach between the organisations mentioned above. The Council is not in a position itself to co-ordinate such work. It therefore expects those agencies with direct responsibilities for the management and health of wild fish stocks to take the initiative, working constructively with the fish farming industry wherever possible.</p>

Section	Organisation	Comment	Response
Area Policies	Wester Ross Fisheries Trust	Policies for areas 'H', 'I' and 'J' (continued) - If the salmon farming industry wishes to increase levels of production within the area above existing levels, it (i.e. the aquaculture industry) needs to invest in providing the information needed from which an assessment of impact to wild fish populations can be made. This will include peer-reviewed modelling of potential sea lice infection pressures. Lice emissions from farms in these areas could drift back towards upper Loch Torridon, or north to the Red Point and Loch Gairloch areas. We simply don't know.	Comments noted.
Area Policies	Wester Ross Fisheries Trust	Policies for areas 'H', 'I' & 'J' - WRFT disagrees. There is a greater risk to salmon post-smolts and sea trout migrating from rivers to the south of the Loch Torridon along the Applecross coast from interacting with salmon farms in this area. This scenario also applies to fish migrating from rivers to the north of Loch Torridon (e.g. from Loch Gairloch area). Adopting the precautionary approach, our current recommendation would be: 'Presumption against further salmon farm development in these areas until more information is available on migration routes for wild juvenile salmon from rivers to the south and north of Loch Torridon and the cumulative risk to them from passing close to a chain of farms (including farms in outer Loch Carron and in the Loch Alsh area).'	The Framework Plan aims to present a realistic picture of the opportunities for and constraints on aquaculture development in Loch Torridon. This balance includes providing the aquaculture industry with some guidance on areas for potential development, along with the areas where further development would not be supported.

<b>Section</b>	<b>Organisation</b>	<b>Comment</b>	<b>Response</b>
Area Policies	Wester Ross Fisheries Trust	Policy for area 'G' - WRFT agrees with the existing text with the following addition: "An applicant for a new or modified site would need to be able to demonstrate that the cumulative risk to wild salmon and sea trout populations within the Loch Torridon area would not increase as a result of the proposed development."	See response to WRFT's comment on the area policy for zone 'A' above.
Area Policies	Wester Ross Fisheries Trust	Policy for area 'E' states "Presumption in favour of small to medium-scale aquaculture installations which are well-spaced, sensitively located, and designed to be in keeping with the landscape and avoid impinging on views across the loch. The existing fish farm at Camas an Leim has seen successive phases of expansion and is considered to be at its maximum acceptable size". Please add: "There should be no overall increase in farm salmon biomass within this area".	The council is not empowered to regulate fish farm biomass which is the role of SEPA and MSS. Biomass considerations can be taken into account when these organisations comment on individual planning applications or set down limits for the loch as a whole.
Area Policies	Wester Ross Fisheries Trust	Policies for areas 'C' & 'D' - WRFT agrees.	Support noted.

Section	Organisation	Comment	Response
Area Policies	Wester Ross Fisheries Trust	Policy for Area 'B' states "Presumption in favour of use as an anchorage. Small-scale shellfish farming or fin-fish farming trial units would be acceptable if compatible with the local amenity of the area and kept clear of the main anchorage and navigational approaches". Please change the next sentence in the policy ["Presumption against larger-scale aquaculture installations or intensive use of Loch Diabaig for this purpose"] to "Presumption against more than one small-scale (up to 500 tonne biomass) fin-fish farm within this area".	As "small-scale" has already been defined, there is no need to restate the limit. By stating that larger-scale developments would not be permitted, the existing policy removes any ambiguity.
Area Policies	Wester Ross Fisheries Trust	The policy for zone 'A' states "Development proposals in the area south of the bay at Craig and northwest of Sgeir Dùghall will be regarded favourably if the equipment is suitably robust, other interests are taken properly into account, and it helps to take pressure off more sensitive areas of Loch Shildaig and Upper Loch Torridon." Please add " An applicant would need to be able to demonstrate that the cumulative risk to wild salmon and sea trout populations within the Loch Torridon area would not increase as a result of a salmon farm in this area.'	As it would be practically impossible for an applicant to demonstrate that there would be no increased risk to wild salmonids, it would be unreasonable to add the comment suggested. The screening and scoping stage of any fish farm application would be the appropriate time for both the developer and the WRFT to provide relevant data.

<b>Section</b>	<b>Organisation</b>	<b>Comment</b>	<b>Response</b>
Area Policies	Wester Ross Fisheries Trust	Some areas indicate that ‘small’ or ‘medium’ scale developments might be approved. A ‘small’ 2,000 sq.m. farm I think equates to about 500 tonne biomass; a 4,000 sq.m. farm to 1,000 tonne biomass. It is not clear whether or not two or more small or medium sized farms could be added to one small section of the coast. Again we would seek clarification of limits.	Each application would be judged on its merits and would consider the impact on the wider loch, not just within a policy zone. Any limit would be dependent on a number of factors, not all of them under the control of planning.
Area Policies	Wester Ross Fisheries Trust	Modern cage designs are more robust than in the past, and most escapes in recent years that WRFT is aware of have been associated with human error, defective equipment (nets tearing) or sometimes seals chewing a hole in a cage, rather than exposure to severe weather. More exposed sites are therefore not necessarily more risky in terms of escapes (all sites have risk), however, other management activities including treatment for sea lice can be problematic at exposed sites.	Comments noted.

Section	Organisation	Comment	Response
Area Policies	Wester Ross Fisheries Trust	<p>WRFT welcomes the presumption against further expansion of salmon farming in Upper Loch Torridon. However, there is no clear logical link from the review of wild fisheries to the proposed policy for aquaculture development within the loch. This could be for one of three reasons:</p> <p>a. The Council has considered the evidence but does not agree that there is potential for salmon farming within the loch to adversely impact upon wild salmon or sea trout populations in particular areas.</p> <p>b. The Council recognises that there is potential for adverse impact (as per page 23), but does not regard the well-being of wild salmon and sea trout populations to be of sufficient importance, relative to other factors, to be of significance as a factor that should limit future aquaculture development.</p> <p>or</p> <p>c. The Council simply does not have the information available from which to assess the potential risks to wild fish populations from salmon farming in particular areas and at different scales, in a form that can usefully guide development.</p> <p>If scenario ‘c’ is the one that the Council is basing its guidance on, WRFT would seek that the Council adopts a more Precautionary Principle than set out in the current draft. It would be irresponsible to promote any overall increase in farm salmon production within the area without</p>	<p>HC relies on MSS and the DSFBs for the most up to date data and information on impacts of sealice, which is a key issue for both wild and farmed salmonids. Given that the plan identified only limited scope for further fin fish farm development, it could be said that a precautionary approach has been used. The policy zone map highlights areas within a 1 km radius of the mouths of each of the three rivers in the area which have significant game fishing interests. In the three policy zones where these river mouths are located (zones ‘D’, ‘E’ and ‘F’), the descriptions of characteristics and constraints all mention the wild fish interest of these rivers. There is a general presumption against aquaculture development involving surface installations in the sub-littoral in zone ‘D’. In zone ‘E’ the policy indicates that the existing fish farm at Camas an Lèim is at its maximum acceptable size and presumes in favour only of small to medium-scale aquaculture installations which are well-spaced and sensitively located. In zone ‘F’ there is a general presumption against finfish farm development. Although protection of wild fish interests is not specifically mentioned as the rationale for constraint, the effect of the policies is such that the wild fish interests there should not be compromised by further significant expansion of finfish farming in these areas.</p> <p>The opportunities for expansion of finfish farming which the plan identifies are mainly in the outer reaches of the loch which are more distant from the game fishing</p>

Section	Organisation	Comment	Response
		a clear understanding of potential threats and risks.	<p>rivers. The responses to the draft plan from Marine Scotland Science and SNH, and these organisation's responses to consultation on the Scottish Government's reviews of the Crown Estate salmon farm</p> <p>consents in Loch Shieldaig, Loch a' Chracaich and Camas an Eilean, do not currently indicate a perception of risk which militates against some expansion of salmon farm production in the outer loch. The framework plan provides broad policy guidance but each planning application is judged on its individual merits. There is therefore ample opportunity at the screening/scoping and evaluation stages for these organisations (and the Wester Ross Fisheries Trust) to appraise the risks to wild fisheries using up-to-date information and to advise the Council accordingly.</p>
Appendix	Marine Scotland	As a general point Marine Scotland Science are referred to as FRS Marine Laboratory and FRS Freshwater Laboratory in Appendix 3.	Noted. When they were consulted at the very beginning of the revised plan several years prior (2006), these were their titles. Text amended to show 'FRS, now Marine Scotland Science'.