

# Loch Torridon Loch Toirbheartan



AQUACULTURE FRAMEWORK PLAN  
CONSULTATION REPORT  
PLANA UISGE-ÀITEACHAIS  
AITHISG CO-CHOMHIRLEACHAIDH

MAY 2011  
CEITEAN 2011



The Highland  
Council  
Comhairle na  
Gàidhealtachd

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PRODUCED BY THE PLANNING AND DEVELOPMENT  
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## **1.0 BACKGROUND FIOSRACHADH**

- 1.1 Highland Council is currently revising and expanding its series of aquaculture framework plans. Loch Torridon was identified in the early stages of this process as one of the areas where the existing framework plan published in 1988 required revision. The draft Loch Torridon Aquaculture Framework Plan was prepared and circulated for public consultation from October to December 2010.
- 1.2 All written comments received as part of the consultation have been appraised and the main issues are outlined below. This report also gives a summary of the amendments which have been incorporated into the revised plan. A full listing of the comments received and the Council's responses to these are set out in table form in Appendix 1. Any paragraph headings or numbers referred to within this consultation report or its appendix relate to the consultative draft plan.

## **2.0 CONSULTATION PROCESS AND OVERVIEW OF RESULTS PRÒISEAS CO-CHOMHAIRLEACHAIDH IS TAR-SHEALLADH AIR TORAIDHEAN**

### **Consultation Process**

- 2.1 The publication of the draft plan was advertised in the West Highland Free Press and inspection copies were lodged at Shieldaig General Stores, Torridon Stores and Café, Kinlochewe and Lochcarron Post Offices, the Council's Lochcarron, Gairloch and Dingwall Service Points, and at the Council's HQ in Inverness. Copies were also sent to the statutory consultees and the relevant finfish and shellfish farm operators, local landowners, community councils and interest groups. In addition a presentation was made at an open community council meeting in Shieldaig on 11<sup>th</sup> January. This provided an opportunity for the local community to discuss the plan with a member of the plan-making team directly.

### **Overview of the response**

#### **COMMENTS ON THE PLAN AS A WHOLE**

- 2.2 Ten written responses were received from a range of organisations, comprising over 100 individual comments.
- 2.3 The majority of these respondents welcomed the updated plan and it was commended for its well written guidance and clarity. Representatives from MSS (Marine Scotland Science) and SEPA (the Scottish Environment Protection Agency) referred to it as a very good example of what framework plans should be delivering. SNH said it

was generally supportive of the plan's objectives and the policies which the plan promotes. The Scottish Salmon Producers Association welcomed the plan and its support for the continuation of finfish farming in Loch Torridon but noted there was little scope for further expansion. WRFT on the other hand, was generally supportive of the plan and asked for a presumption against further development in several zones. A few organisations provided specific comments but did not state their overall view.

## SPECIFIC COMMENTS ON THE STRATEGY AND AREA POLICIES

- 2.4 The main comments on the overall strategy for the loch and the area policies came from the Crown Estate, Wester Ross Fisheries Trust, the Scottish Salmon Producers' Organisation, Marine Harvest and Scottish Natural Heritage (SNH). The Crown Estate agreed with the broad terms of the strategy and welcomed the plan's identification of further opportunities for development and encouragement for use of inactive sites. The Crown Estate also indicated broad support for the area policies whilst acknowledging that some of the recommendations on scale of development might not always fit with the parameters of business viability.
- 2.5 SSPO felt the plan's objectives should put greater emphasis on accommodating growth of the fish farming industry and Marine Harvest, which is keen to maximise production on its better-performing fish farm sites, suggested that the plan was too restrictive. On the other hand, the Wester Ross Fisheries Trust, supported by Wester Ross Area Salmon Fishery Board, felt the plan favoured the growth of fish farming too much. Given the risks to wild fish populations from higher than normal levels of sea lice and from fish farm escapes it suggested the plan should restrict further expansion in the outer loch as well as in the upper loch.
- 2.6 The contradictory nature of these views, the general support for the plan from the regulatory bodies, and the lack of any adverse comments from the local community suggest that a reasonable balance of interests has been achieved overall. Verbal comments received from community representatives at the public meeting in Shieldaig also support this assessment.
- 2.7 Several respondents commented on policy zone 'E' - the south side of the upper loch - which is currently the zone with the most significant aquaculture presence. Marine Harvest suggested that the policy presumption against further expansion of its fish farm at Camas an Leim could put the site's long-term future and local employment at risk. SNH however felt constraints in this area, such as the presence of the Balgy salmon river, would make it difficult to favour further development. Marine Scotland also questioned the general acceptability of finfish aquaculture in this policy zone since it may raise

issues relating to the proximity of the River Balgy and interactions with wild salmonids. Landscape impact is a key consideration in this case and the pre-consultative draft of Scotland's National Marine Plan (p27) highlights the need to give detailed consideration to developments within an NSA.

- 2.8 SNH suggested that the policy for zone 'H' (Camas an Eilean, Loch a' Chracaich, and Loch Beag) should be amended to presume against further expansion of aquaculture beyond its currently consented levels to safeguard the scenic quality along the popular coastal tourist route there. It also requested further information on the life span of the plan

#### OTHER COMMENTS

- 2.9 Most of the comments from the other respondents (e.g. West Highland Anchorages & Mooring Association), related to details in the supporting text or map rather than the detail of the draft policies. Comments from SNH, MSS and SEPA covered a number of technical points regarding equipment use and additional sources of information that should be quoted. An appendix of additional information has been added to the plan. MSS also provided a range of data sources on the research which it had carried out on sea lice in the loch.
- 2.10 The Crown Estate commented that suggestions from the industry for improvement of equipment in consultation with others may help to mitigate potential landscape impacts. The greater use of pre-application discussions is helping to progress this issue.
- 2.11 The Scottish Salmon Producers Organisation felt the economic value of aquaculture was under-represented in the text and more emphasis should have been placed on links to other policies. These comments were supported by Marine Harvest.
- 2.12 Wester Ross Fisheries Trust felt the proposed policy for aquaculture development within the loch did not flow logically from the review of wild fisheries issues in the earlier part of the document. The organization was of the opinion that the precautionary principle should be applied more rigorously to the loch, ie no further expansion of salmon production should be allowed without a reliable indication that the risks to local wild salmon and sea trout populations would not increase.

### **3.0 CHANGES MADE TO THE PLAN IN RESPONSE TO COMMENTS RECEIVED ATHARRACHAIDHEAN DON PHLANA MAR FHREAGAIRT AIR BEACHDAN A FHUAIREADH**

- 3.1 **Foreword:** The text has been expanded to acknowledge from the outset the economic importance of aquaculture and its contribution to the Council's strategic aim of achieving sustainable communities.
- 3.2 **Planning Policy Context:** Text has been added to mention the Water Framework Directive and SEPA's West Highland Area Management Plan. A paragraph has been added on the vision of the Highland-wide Local Development Plan and how it relates to aquaculture. Additional guidance information has been provided in a separate appendix.
- 3.3 **Future Prospects for Aquaculture Development:** This section of the plan was amended to clarify that the limited scope for further fish farms in the area stems primarily from landscape considerations. There could be a reduction in visual and landscape impacts if separation distances between the installations were increased. This could also have health and productivity benefits for the farmed stock. The potential for escaped farm fish and knock-on effects has been added as a relevant issue in relation to siting farms in more exposed areas.
- 3.4 **Planning and Development Considerations:** A paragraph has been added at the beginning of this section to clarify the roles of various organisations which the local authority must take into account when dealing with aquaculture applications and local policy guidance.
- 3.5 **Economic Development:** Additional information has been provided on the economic value of aquaculture and the potential for marine renewable energy developments in the loch.
- 3.6 **Water Quality:** This section was amended to highlight additional sea lice treatment procedures and the importance of linking the plan with the Water Framework Directive.
- 3.7 **Predator control:** the use of Acoustic Deterrent Devices on fish farms and planning authorities' duty regarding protected species and habitats has been clarified.
- 3.8 **Inshore Fishing:** the text has been updated to take account of the recent loss of Marine Stewardship Council certification from the *Nephrops* fishery.
- 3.9 **Landscape and Visual Amenity:** information has been added on the recent work by SNH which tabulates the special qualities of each National Scenic Area.

- 3.10 **Game Fisheries:** Information was received post-consultation regarding the cessation of SG funding for the Tri-partite Working Group. The text of the plan has therefore been amended to reflect this.
- 3.11 **Strategy and Introduction to the Area Policies:** A paragraph has been added to the end of this section which explains that formal adoption of the aquaculture framework plan as supplementary guidance, and its subsequent review, will be linked to the process for adopting and reviewing the Highland-wide Development Plan. Reference is also made to the emerging national and regional marine planning framework, which is likely to have an influence on the development of local coastal plans in the future.
- 3.12 **Policy Map:** The map has been amended to add/remove mooring points as advised (some anchorage areas have been targeted by the community for an expansion of moorings; others have been made less viable by the presence of aquaculture equipment). Key place names mentioned in the text have also been included on the map.
- 3.13 **Area Policies:** The policy for zone 'D' (the north side and head of the upper loch) has been amended slightly to mention the importance of safeguarding views over open water from settlements. This is to align the plan more closely with the local development plan policies.
- 3.14 The policy for zone 'I' (the south side of the outer loch) has also been amended slightly to clarify that visual amenity is an important consideration along this section of the coast as a whole, not just around the small settlements there.
- 3.15 **Bibliography:** The bibliography has been expanded to include a reference to Scotland's new Marine Atlas and some scientific reports on the environmental impacts of anti-foulants and aquaculture. A short list of useful websites has also been added. These give access to relevant guidance material from Marine Scotland, SNH, and SEPA.

## **Appendix 1**

Tabulated comments, responses and amendments  
resulting from public consultation on

### **Loch Torridon Aquaculture Framework Plan Consultative Draft**