

Topic	Organisation	Comment	Highland Council response
General	Scottish Salmon Producer's Association	The SSPO welcomes the Loch Nevis Aquaculture Framework Plan draft policy, with its clearly defined area map and its notable features and developments. The loch system supports a wide range of activities, including finfish farming, and these have been adequately expressed in the document.	Support noted
General	The Crown Estate	Generally, the plan provides a comprehensive and detailed assessment of the character, significant environmental features and socio-economic activities of Loch Nevis, and the descriptions of the potential interactions of aquaculture developments with those features, where applicable, are also largely both accurate and balanced.	Support noted
General	Scottish Natural Heritage	SNH supports the strategy and area policies in general and considers that there will be overall benefits to biodiversity and the special qualities of the landscape of the Knoydart National Scenic Area.	Support noted
General	West Highland Anchorages and Moorings Association	This is a welcome and comprehensive document with an encouraging overall view of the need to preserve such areas and communities from adverse and unwelcome developments.	Support noted
General	Historic Scotland	The preparation of the framework is welcomed. The Environmental Report is well presented and clearly considers the environmental implications of the framework.	Support noted

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General	The Lochaber District Salmon Fishery Board	In general we are very supportive of the plan and in particular would support the general view that there is no scope for expansion of existing fin fish farming but possible scope for further shellfish farming.	Support noted but the plan does provide scope for further development of finfish as well as shellfish farming.
General	SEPA	Generally, we consider that the document is set out well, is easy to follow and covers all the important issues.	Support noted
Planning Policy Context	The Crown Estate	In the case of salmon farming in particular, arrangements for operational practices such as stocking/fallowing and veterinary treatment of sites and stock on an Area Management basis mean that the requirement for sites has taken on an increasingly strategic planning aspect for developers. We therefore feel it worth mentioning that in light of this, development potential in particular loch systems be viewed when circumstances call for it, in terms of any wider strategic net benefit that might accrue from a proposal, across say two such management areas/loch systems.	Noted

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Planning Policy Context	The Crown Estate	<p>The marine environment is characterised, in respect of planning for developments such as aquaculture, by a lack of data that informs on the local availability of suitable resource such as bathymetry (charts contain many extrapolations and so are not always accurate), hydrography, benthic substrate, etc. It is virtually always the case that developers need to explore and confirm opportunity that first impressions may indicate as being available. Understandably this framework plan cannot offer such information, but in the absence of such, we suggest that the plan includes opportunity for prospective developers to 'explore' for available resource that might accommodate a viable commercial aquaculture enterprise. In this regard therefore we consider that the prescriptive recommendations for acceptable development in the policy zones may act as a disincentive to such an approach.</p> <p>Obviously where environmental sensitivities and/or marine use interests were such that aquaculture would pose unacceptable impacts, areas can be indicated as 'off limits' to development, such as the inner basin of Loch Nevis.</p>	<p>There is nothing in the plan to stop prospective developers from exploring the potential for larger scale operation than is there at present. However, to suggest that policy recommendations on appropriate scale should be stripped out of the plan to encourage such exploration undermines the purpose of local planning guidance which is to help fit development to the context. It would be an oversimplification to reduce the spectrum of local planning policy guidance in Loch Nevis to either "yes" or "no" for aquaculture. What the plan indicates in policies for the different parts of Loch Nevis is the scale of development which, taking all interests into consideration, the Council, as planning authority, would be comfortable with. This does not preclude larger scale proposals being submitted but they would be evaluated on their merits and the Council's support should not be assumed.</p>

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Planning Policy Context	Crofters' Commission	<p>But in other areas or zones the comprehensive information provided on other interests, conflicts and constraints could then be considered and relevant issues addressed in any development proposal, and opportunity afforded for developers to seek to utilise advances or innovation in equipment design and operational practice to mitigate any conflicts to an acceptable level, in locations where suitable resource in respect of their particular requirements is seen to exist. This would create a situation where economically viable development is not precluded, through any prescriptive planning limits on size/appearance, etc, but might be acceptable on the basis of appropriate mitigation of conflicts with the other interests indicated.</p> <p>Map of crofting boundaries provided</p>	Noted

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Objectives	The Crown Estate	<p>Suggest objectives include the stated promotion of both environmentally and economically sustainable aquaculture, given that both must apply to any commercial activity considered being 'sustainable' (acknowledged elsewhere in the document). This objective should then manifest itself in the proposals for aquaculture development in the plan. At least two of the policy zones (C and E) recommend scope for "small to medium scale shellfish cultivation", and another for development "discreet in scale". While these may fit sympathetically with the environmental features under consideration, they firstly do not give much indication of the nature, in equipment terms, of what constitutes such development, and secondly whether this nature comprises development that is indeed economically viable in relation to the business concerned. I'm sure the council is aware that both fin and shell fish production and their markets have developed over the past twenty to thirty years such that what was considered small but viable a decade ago might now be economically unviable.</p> <p>Given the duration of the plan, on-going changes in factors such as farm size which impact on economic competitiveness and so sustainability are likely. If this plan is to constitute a proper assessment of commercial aquaculture potential in Loch Nevis, such considerations are material to such an objective.</p>	<p>The framework plan is primarily a plan for how to make best use of a specific place for aquaculture taking other interests into account. From a purely business perspective it might seem attractive to make business viability a central objective of the plan, whatever the cost. However, this objective could clash with the wider environmental or community interest, particularly if it meant encouraging the development of large-scale, highly-automated production systems which might generate relatively little local benefit. It is also inherently difficult for a coastal plan to target and deliver economic sustainability because the parameters of business viability are constantly changing and they are subject to the vagaries of the international market. If, for example, pressures in the international market and the profit motive are driving producers to operate larger and larger-scale marine farms, it seems unreasonable to yoke local planning policy guidance to such a trend irrespective of local place characteristics and sensitivities.</p> <p>For clarity, the Council's definitions of what it means by "small" and "medium-scale" finfish and shellfish farms has been inserted after para 105 in the "Strategy and Area Policies" section.</p>

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Scale of Aquaculture Development and Potential: historic and present level of development	Scottish Sea Farms	Para 25 - Might be better to say [<i>the salmon farming sites</i>] are "leased by" rather than "managed by" two operators. The Ardintigh site is also farmed by SSF, by arrangement with the leaseholder, Tom McLean.	Text amended accordingly.
Future Prospects for Aquaculture Development	SEPA	Para 29 - Note that halibut farms in Norway utilise the depth of the fjords and the nets are very deep with multiple-floors in them to increase the suitable spaces for the halibut. As Loch Nevis is also very deep then we highlight that perhaps this technology could be utilised there too.	Last part of para 29 amended to read: "Their cultivation also may require a much greater cage surface area for a given biomass of stock compared to a salmon farm, or alternatively, deeper nets with multiple floors in them."
Future Prospects for Aquaculture Development	SNH	In paragraph 35 of the plan it is stated that the separation distances between farms is still a relevant issue, and seen as an opportunity to be addressed during the forthcoming fish farm reviews. Separation distances are mainly for disease issues which are now covered by Marine Scotland (Fish Health Inspectorate). The plan infers that movement of farms be addressed due to these separation distances (and disease issues), but the policy only refers to landscape concerns. This needs clarification.	Text of para 35 amended: "However" replaced by "In addition" and "control visual impact" replaced by "help reduce visual and landscape impacts".
Planning and development considerations: Economic Development	Scottish Sea Farms	Para 39 - During 2008 & 2009 SSF have employed 13 full-time, 2 part-time, almost all resident in Mallaig.	Amended accordingly - note that not all aquaculture workers are employed by Scottish Sea Farms.

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Navigation	Scottish Sea Farms	Para 51 - [<i>"Following receipt of planning consent..."</i>] not good advice - probably better to ensure no navigational obstacles to consent <i>before</i> undertaking the planning application	Para 51 amended to remove the text " Following receipt of planning consent for any marine installation".
Water Quality	Scottish Sea Farms	Para 58 [<i>re use of anti-foulant chemicals based on copper or zinc compounds</i>] - suggest leaving this out, as it is a SEPA/HSE area of responsibility, rather than planning.	As anti-fouling is a key part of aquaculture, it is important that the plan covers all the main issues.
Feed Barges, Automatic Feeders and Undersea Lighting	Scottish Sea Farms	Para 66 - Maturation underwater lighting is widely used and is part of the normal process of farming salmon. Clearly it does, by definition, introduce an unnatural light source, albeit visible only at night, from above, for limited periods.	Accepted: text amended to "In the event that underwater lighting is required, it should be used with great sensitivity."
Predator Control Arrangements and Interactions with Other Species	Scottish Sea Farms	Para 68 - Acoustic Deterrent Devices - the device automatically activated is not in wide use and may not be effective. Should check whether disturbance licence is actually available at this time - may be better to refer to possible future control under the Marine Bill.	Text amended: "All cetaceans are protected species under European legislation. Any activity which may cause them harm or lead to them being displaced from their natural range, such as the use of seal scarers, should only be carried out with a licence from the Scottish Government Licence Team. This role will pass to Marine Scotland in due course."
Predator Control Arrangements and Interactions with Other Species	Scottish Sea Farms	Para 69 - tensioned nets and good fish husbandry are not an alternative method, they are first line of defence. Predator nets ARE alternative, and not practical at large or circular sites. They commonly entangle diving birds, and are a risk to seals & cetaceans too.	Section rewritten to encompass comments.

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Inshore Fishing	Strutt & Parker LLP	Paras 77/78 - Our clients wish to add a further (possibly late) comment/suggestion - large trawlers/dredgers should be fishing above the mouth of Loch Nevis (ie upstream of a line from Earnsaig Point to the Virgin Mary monument on Knoydart) and that fishing should be restricted to local boats only to restore habitats and stocks. It is believed that this arrangement has been put in place on Loch Hourn to good effect leading to a significant increase in shellfish in particular.	Noted
Nature Conservation: Cetaceans	Scottish Sea Farms	Para 86 - Acoustic Deterrrent Devices (ADDs) are effective, but they are definitely not cheap.	Text amended: the words "cheap and" removed.
Nature Conservation: Other Species	Scottish Sea Farms	Para 87 - forests of <i>Funiculina</i> line the loch ?? Is this true?	Text amended so that first sentence reads: "Areas of the tall sea pen <i>Funiculina quadrangulais</i> are found in the loch in sediments below about 25m."
Recreation	Scottish Sea Farms	Para 92 - Competition between recreational boating & aquaculture in Inverie Bay ?	Text amended: Deleted sentence which reads: "This competition has been noticable in Inverie Bay from time to time" and replaced with "For example, there have been shellfish farming applications in Inverie Bay which have been refused or amended by the Crown Estate to protect recreational/navigation interests."
Archaeology	Historic Scotland	We are content with [<i>the plan's</i>] provisions for our national historic environment interests.	Noted

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Game Fisheries	The Lochaber District Salmon Fishery Board	The wording of the 'game fisheries' section states that the primary reason for safeguarding the rivers is to protect wild 'fisheries'. We would contend that it is not the fisheries that need protecting first and foremost but the species itself – the salmon and sea trout of Loch Nevis are a hugely important ecological species and they should be safeguarded at all costs. The fact that their health supports a local rod fishery is secondary to the importance of protecting them as a species.	Text added: "As well as being important species in their own right, the salmon and sea trout of Loch Nevis have economic value as game fish."
Game Fisheries	Scottish Sea Farms	Para 101 - preferably remove benthic effects from the list of potential effects [<i>of intensive salmon aquaculture</i>] on game fisheries - unlikely I think	Wild salmon and sea trout rely on a healthy food web of which the benthos is a key part.
Game Fisheries	Scottish Sea Farms	para 102 - Nevis Area Management Agreement is established & active.	Noted - cross-referenced to comments from SEPA and the Lochaber District Salmon Fishery Board.
Game Fisheries	Lochaber District Salmon Fishery Board	Para 102 - The salmon industry is keen to promote the idea that it is taking a responsible attitude to wild fishery protection due simply to the fact that it is signing up to these voluntary agreements. Aquaculture Plans for any region should treat this with extreme caution. The Lochaber Fishery Trust – local independent fishery biologists – can be consulted for up-to-date research into the continuing negative impact of aquaculture in the Lochaber region irrespective of the presence of these plans.	Noted.

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Game Fisheries	Lochaber District Salmon Fishery Board	Paras 102/103 - While LDSFB is a great advocate of the AMA/TWG process (and indeed is one of its key participants), the board would argue strongly that the presence of a purely voluntary agreement should not influence the [<i>Loch Nevis Aquaculture Framework</i>] plan or any other within this region. There is a temptation to think that the presence of an AMA means some sort of 'environmental credential' for the salmon farming industry whereas this is simply not the case. These agreements can be broken at any time due to their voluntary nature. We believe that binding and official matters such as planning guidelines should not take into account something like AMA's which are purely voluntary.	Text amended to add " Whilst the Loch Nevis AMA is established and active, it must be noted that this operates on a voluntary basis". Cross-reference to the comments from SEPA and Scottish Sea Farms.
Game Fisheries	SEPA	Para 103 - . We welcome the strong line to be taken on Area Management Agreements; it could be further strengthened by changing the last sentence of this section to "Agreements will be compulsory..."	It is outwith the scope of the Highland Council to make voluntary Area Management Agreements compulsory.

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Strategy and Area Policies	The Crown Estate	While it is appreciated that splitting the loch into the various 'policy zone' aids the more detailed planning recommendations, a number of the interactions, impacts and whatever associated mitigation is possible, of aquaculture developments are likely to span more than one policy zone in practice. We therefore suggest caution in examining development proposals within the context of the policy zones alone. Consideration of the loch-wide benefits/impacts should also be factored in. An example might be in respect of visual landscape/seascape amenity. The immediate features of the policy zone may be used to determine aquaculture development potential but any proposed development is likely also to be 'encountered' in visual terms as part of a more panoramic vista encompassing a greater swathe of the loch than any one zone, and it should be considered in such terms as well. While a development may not be entirely appropriate within any one zone, we feel it should also be examined in the context of its relationship to the wider loch development portfolio.	The recommendations given for individual policy zones are an important frame of reference but they are not the only one. The policy zones do not exist in isolation so the wider benefits or impacts likely to arise from a specific development proposal would also be factored into an appraisal. The strategy for the loch as a whole is important, as is the status and role of the Loch Nevis area in national and regional terms. The meaning of the phrase "the wider loch development portfolio" is not clear. A distinction has to be made between the theoretical scope for development of aquaculture, which assumes that other interests in the area can all be put to one side, and a level of development which is likely to be acceptable to these other interests.
Policy Map	Scottish Sea Farms	A few place names appear in the text which are not shown on the map. For example, para 20 - Sron Gaineach (should be Raineach I think) - as water depth is not shown on the map, it is not entirely clear where the sill is. Also para 48 - Glaschoille.	Various place names amended and marked on map.
Policy Map	West Highland Anchorages & Mooring Association	Mooring at Doune has been omitted from policy map.	Co-ordinates provided by WHA&MA and symbol added to map.

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Policy Map	WA Marine & Environment	CD of <i>Zostera marina</i> beds in Inverie Bay provided	Map amended.
Policy Map	Camusrory Estate	[<i>Two requests:</i>] Firstly, would ask you to remove the sign on this plan indicating a jetty, pier or slipway, just under the word "Camusrory". The pier is the property of, and is wholly constructed and maintained by Camusrory Estate. It has been agreed with the Rights of Way Officer for the area that this pier forms part of the curtilage of the Estate, and it now carries a sign with the wording: "Camusrory Estate - Private Curtilage - No Unauthorised Landing". If a pier is marked on a formal policy plan, anyone in possession or sight of such a plan is going to draw the not-unreasonable conclusion that the pier has public access, which [<i>in this case</i>] it does not. It is, excluded, as you will understand, from the implications of public access and Rights of Way under the Land Reform Act.	The pier is marked on both the Ordnance Survey map and hydrographic chart for the area and has an influence on the use of upper Loch Nevis. It is therefore appropriate that the pier should be marked as a feature on the policy map, just as other private piers are. The purpose of the map is to aid and inform sustainable aquaculture development in the loch. It is not intended, nor is it likely, to be used for navigational purposes. Appendix 3 of the plan clearly states that the pier at Camusrory is private. However, to further assist in avoiding misunderstandings, the following text has been added as a footnote to the policy map: "At the time of writing, all jetties, piers and slipways marked on this map were private apart from Inverie".
Policy Map	Camusrory Estate	The second request is for you to remove the anchorage sign at the head of the Loch. This is not to preserve privacy - for which I understand that we have no right - but for practical reasons. Where this anchorage sign is indicated, there is a long shallow beach, the tide probably goes out a good half a mile. Not every yacht, but at least one or two a year, come and moor at high tide, and then go aground as the tide goes out.	The anchorage is listed in the Admiralty Pilot so it seems appropriate that it should be marked on the policy map. The position of the anchorage which is shown on the policy map is as specified in the pilot. The policy map is unlikely to be used, nor is it intended, for navigational purposes and the responsibility for safe mooring rests with boat operators.

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Policy Map	West of Scotland Fish Producers Organisation	The dotted area in the outer parts of the loch is shown on the policy map as a favoured commercial fishing area. [However] the area used by fishing vessels, especially by some of the smaller trawlers in the winter months, extends much further into the loch - as far as Tarbet - and thus already co-exists with the current aquaculture development. Any further development which impinges on the fishing areas may force these vessels to fish in other, more exposed areas, which then becomes a safety concern if weather is inclement or they may just tie up altogether. For share fishermen this means they will not be able to earn any money.	Text amended in the Inshore Fishing section to add "However, it should be noted that, especially in the winter months, trawlers may fish as far up the loch as Tarbet." Policy map amended to show that the favoured commercial fishing area extends up to Tarbet.
Area Policies: general comment	Scottish Salmon Producers Association	The strategy generally supports the continuation of finfish farming in Loch Nevis but does not support an increase in the amount of development. The importance of the finfish farms located in Loch Nevis cannot be overestimated, with the sites employing a skilled labour force and using local services which provide valuable income to the surrounding area.	The strategy provides a number of suggestions for potential growth. The production of the AFP itself shows the Council's commitment to supporting aquaculture in Loch Nevis.

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Area Policies: general comment	Scottish Salmon Producers Association	The current finfish sites are based in policy zone 'F' but there is little opportunity to expand there. The inner loch (zone 'D') is logistically remote and more sensitive to any potential development due to the 'wild' nature of the area and restricted access through the Kyles. The area around Inverie (zone 'B') has a number of sheltered anchorages, is on the ferry route to Mallaig and is a favoured commercial fishing area. These areas are therefore less open to the possibility of development for finfish farming. The area around Inverie (B) has a number of sheltered anchorages, is on the ferry route to Mallaig and is a favoured commercial fishing area. These areas are therefore less open to the possibility of development for finfish farming. Other areas detailed for potential expansion or development of finfish farming are identified in the draft as being in sector A, however this is not a practical possibility with present farming techniques due to the exposed location of this section of the coast.	The Framework Plan aims to present a realistic picture of the opportunities for, and constraints on aquaculture development in Loch Nevis, taking all the relevant interests into consideration. The plan acknowledges that Zone 'F' is the most suitable area in Loch Nevis for aquaculture on a significant scale and the current level of development already there reflects this. It is certainly less constrained than zones 'B' and 'D'. However, the scale of appropriate development in zone 'F' is a legitimate planning consideration as it is elsewhere, and the policy for zone F has been tuned to reflect this (see also below the amendments made to the draft plan in response to Mr McClean's comments). The plan acknowledges that the potential for finfish farming development in part of zone 'A' may only be realised if the technical issues associated with using this more exposed area can be overcome. However, given the industry's increasing interest in developing more exposed offshore sites, this opportunity still seems worth flagging up.
Area Policies: general comment	Scottish Salmon Producers Association	There is an acknowledgement of the improved technology and systems now available for use on finfish farms sites which can reduce both their visual impact and the noise associated with the operational activities of the farms. This is particularly important given the loch's designation as part of the Knoydart National Scenic Area.	Noted

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Area Policies: general comment	Strutt & Parker LLP	Our clients are generally supportive of the draft framework plan objectives and policies but would make the following comments in respect of the policies for areas 'C' through to 'G [<i>see comments by Strutt & Parker for each policy area below</i>].	Supported noted.
Area Policies: Area C - Middle reaches of Loch Nevis (east/north side) (An Cnap to Kylesknoydart)	Strutt & Parker LLP	Area C (adjacent land not owned by any Strutt and Parker clients but overlooked by them and relevant in terms of access to the narrows): strongly support presumption against any development other than in Braomsaig Bay which should only be used to reduce concentration at Ardintigh Bay.	The Council believes that a general presumption against development along this coastline other than in Braomisaig Bay could be a little too restrictive. The Council's policy recognises however that fishing, navigation and scenic quality considerations would have to be adequately addressed before such development could be endorsed. The Council similarly believes it would be overly restrictive to insist that further development In Braomisaig Bay should be conditional on reduction at Ardintigh Bay. Mr McClean has made the case that his income from the Ardintigh finfish and shellfish farming operations should not be threatened by development proposals elsewhere over which he has no control.
Area Policies: Area C	Scottish Sea Farms	SSF considers the unused shellfish site at Braomisaig to have potential as a finfish site, but has not actively investigated the possibilities.	Noted

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Area Policies: Area D - Inner Loch Nevis	Royal Yachting Association (Scotland)	Query re apparent omission - approximately half way between Kylesnoydart and Camasroy on the northern shore of Inner Loch Nevis there are the remains of a fish or mussel farm which may be in operation or just deserted. It is a possible occasional anchoring spot and if derelict should be removed. If not derelict, it should be queried by the Scottish Government because of the lack of water exchange [<i>existing Crown Estate development consents are currently being audited to determine which should receive permanent planning consent, and if so, what conditions should apply</i>].	No current permission for aquaculture is known to be in place at this site. Comments on this have been passed on to the Scottish Government and the Crown Estate.
Area Policies: Area D	Strutt & Parker LLP	Area D (land adjacent not owned by any of Strutt & Parker's clients but relevant in terms of traffic/water quality through the narrows): strongly support presumption against development.	Support noted.
Area Policies: Area E - Tarbet Bay and approaches	Strutt & Parker LLP	Area E (land adjacent owned by Strutt & Parker client): strongly support presumption against further development.	The Council's presumption is in favour of small to medium-scale shellfish farming development, but not to exceed current levels.
Area Policies: Area E	Scottish Sea Farms	Para 122 - Should the 3rd sentence begin "East of the bay"?	Yes - text amended to read "East of the bay".
Area Policies: Area F	Strutt & Parker LLP	Area F (adjacent land owned by Strutt & Parker clients): strongly support presumption against any development 1km either side of Stoul point and proposals to presume against further development in this area, other than relocation of existing capacity in Ardentigh Bay to Earnsaig/Stoule/Braomsaig.	The policy in paragraph 130, which includes a presumption against development 1 km either side of the point at Stoul has been retained. However, in light of representations from Mr McClean (see below), the policies in paragraphs 131 and 132 have been deleted. Strutt & Parker's view that further development in zone 'F' should be resisted, unless it involves relocation of capacity from Ardentigh, is noted.

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Area Policies: Area F	SEPA	Para 126 - In the first sentence, the use of the word "industrial" could perhaps be replaced by "large-scale".	Text amended as suggested.
Area Policies: Area F	SNH	In paragraph 128 the plan states that the combination of the two operations in Ardintigh Bay has resulted in a cramped lay-out which could be addressed by relocation. A cramped layout may not necessarily be inappropriate if the siting and design was according to SNH guidance. Imagery of the actual sites would be of help in clarifying this.	A cramped layout is one where, by definition, installations look uncomfortably close together. Application of elements of the design guidance (e.g. alignment of installations with the coast, use of subdued colours etc) may mitigate this effect but they are unlikely to remove it altogether. Text amended to read: "A third area is leased for finfish farming in Ardintigh Bay which also has a shellfish farming area (mussels + clam ranching) nearby. The combination of the two operations in Ardintigh Bay, when the shellfish area is being used for mussel farming with longlines, has however resulted in a somewhat cramped layout which could be addressed by relocation."

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Area Policies: Area F	SNH	In paragraph 131, the plan encourages moderate reduction in the current scale of development in Ardintigh Bay by relocating the shellfish farm to a suitable site on the opposite side of the loch or by redistributing the finfish production capacity to the two existing sites between Earnsaig and Stoul and moving the shellfish farm onto the fish farm site. It is not clear if this means that there is too much development in terms of visual impacts. SNH supports any action which will reduce visual impacts. However, by moving any farm there are increased benthic impacts with the new site having benthic impacts where there were none before. However, this may balance out as the seabed beneath the old farm will recover to some degree in time.	Noted and cross-referenced to comments from other respondents. Paragraph 131 deleted.
Area Policies: Area F	Tom McClean Enterprises	Para 128 - Ardintigh Bay : At the outset, could I clarify that Ardintigh Bay refers to the very short bay (about 600m long) running west from Ardintigh Point. It does not refer to the 2.5 km stretch of coastline between Ardintigh and Stoul. Visually, the bay is well defined on the ground although I agree that perhaps this is not so evident from the OS map.	Noted

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Area Policies: Area F	Tom McClean Enterprises	I hold the seabed lease for the salmon farm nearest to Ardintigh (currently operated by Scottish Sea Farms), I also have a lease for the mussel farm (operated by me) in Ardintigh bay and within the same lease a designated area of sea bed at Ardintigh Bay is for a clam ranching area (currently operated by me). These Crown Estate leases are vital to my family's livelihood. Last year, the salmon farm lease earned more than the outdoor adventure centre, although this is not always the case but it does demonstrate the critical economic margins of living and working in a rural area.	Noted
Area Policies: Area F	Tom McClean Enterprises	The policies set out in paragraphs 131 and 132, if implemented, will have a direct and adverse effect on our livelihood. We have lived and worked at Ardintigh for the last 40 years and during this time we have been the only residents in the middle reaches of the south coastline of Loch Nevis. Our existing sea farms (salmon, mussels and clams in and around Ardintigh Bay have been a key part of our livelihood). We would be grateful if, in light of the points set out below, you would consider reviewing these policies such as to delete the "relocation" requirements of paragraphs 131 and 132. If they are to be rigidly adhered to, they will cause financial hardship to our family and to others.	Mr McClean's commitment to the Loch Nevis area is not in doubt and it is understandable that he should wish to maintain the level of his current income from aquaculture. The area policy in para 131 of the draft plan recommended relocating some of the production from Ardintigh Bay to space it out better rather than required a cut in production overall. It was not a policy presumption against the principle of continuing aquaculture here. The area policy in para 132 of the draft plan did not dictate a scaling down of the finfish farm in Ardintigh Bay. It responded to the fact that there are 3 finfish farm installations in fairly close proximity within the policy zone and together these have a cumulative visual impact which is approaching the limits of acceptability in the context of Loch Nevis.

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Area Policies: Area F			<p>Given the close proximity of two aquaculture operations at Ardentigh, the wider landscape setting, and the need to safeguard the amenity of the bay, significant expansion of the finfish farm there is unlikely to be acceptable unless some of the shellfish production could be relocated. The abandoned shellfish farm site in Braomisaig Bay, on the opposite side of the loch, seems to be an obvious candidate for such relocation. It should be noted that on two separate occasions the Crown Estate reduced the scale of finfish lease area which the leaseholder applied for in Ardentigh Bay – in 1987 and in 2001. When a reason for this was given it was “to minimise effects on fishing and landscape”.</p>

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Area Policies: Area F	Tom McClean Enterprises	<p>My salmon farm lease, to the west of Ardintigh, is one of three operated corporately by Scottish Sea Farms. The other two are between Earnsaig and Stoul. One of these three salmon farms is kept fallow for a period of time each year and they are operated on a rota basis. To relocate my salmon farm as you suggest in para 131, or to amalgamate it with the other two farms, would in our view increase the “industrial-scale fish farming” that you refer to in your paragraph 126. It would also remove the capability of allowing a fallow period for nature to flush and sweep the sea bed. The separation is also good for disease control. Furthermore, notwithstanding the amenity and scientific argument, it would at a stroke, remove a huge element of our income. This would prejudice our livelihood. We have no lease or control over the other two sites. I understand that Scottish Sea Farms (who we believe employ 18 employees) are one of the biggest employers in Mallaig.</p>	<p>Relocation of salmon production from Ardintigh Bay was suggested in the draft plan as an option. The plan’s concern at Ardintigh Bay is not the scale of the salmon farm <i>per se</i> or the shellfish lease <i>per se</i>, but the close proximity and combined visual impact of the two when the latter is used for mussel cultivation. However, the point about rotational fallowing of the three salmon farm sites in policy zone ‘F’ is noted. Para 131 deleted.</p>

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Area Policies: Area F	Tom McClean Enterprises	Clam Ranching Farm : The ranching farm, although outlined on your plan as a physical manifestation, is <u>wholly</u> on the bed of the sea. It is not visible and makes nil impact above the 100m square perimeter fence that is fixed to the seabed. I suggest, respectfully, that it is not appropriate to use this to advance your argument of “resulting in a somewhat cramped lay-out which could be addressed by relocation”	Para 128 of the draft plan merely points out that the combination of shellfish farming and finfish farming at Ardentigh has resulted in a somewhat cramped layout. This judgement is based on a visit to the area when the shellfish lease was being used for long-line mussel culture. When the shellfish lease area is used only for clam ranching (on the seabed) much less surface gear is visible. Text amended in para 128 to read: "A third area is leased for finfish farming just to the west of Ardentigh Bay which also has a shellfish farming area (mussels + clam ranching) in the bay itself. The combination of the two operations at Ardentigh, when the shellfish area is being used for mussel farming with longlines, has however resulted in a somewhat cramped layout which could be addressed by relocation."
Area Policies: Area F	Tom McClean Enterprises	My mussel farm (200m x 300m) is also important to my family's income and I have over £50,000 of investment in its infrastructure. The flotation buoys are all finished in dark matt grey non-reflective surfacing to lessen the visual impact on the landscape. To relocate this farm to Braomisaig as you suggest in your para 131 would be inordinately costly and would result in it lying close to the ferry corridor. In any event, I do not have a lease for this area. It would also result in it being very close to Loch Nevis Shellfish's similar installations and could tend towards your concerns about a “cramped lay-out” and would be highly visible from the Stoul path. I cannot afford to relocate this farm. Operationally, it would be difficult to work from across 2.5km of water.	Points noted and para 131 deleted. The neglect of the Braomisaig site by its current lease holder suggests that the site may become available in the not-too-distant future.

Topic	Organisation	Comment	Highland Council response
Area Policies: Area F	Tom McClean Enterprises	Visual Impact :As you say in your para 126, these salmon farms, because of their “steep hill backdrop means they are relatively unobtrusive when viewed across the loch from Inverie”. We agree with you on this and we also agree that we need to achieve an “acceptable balance” as you say. We feel that balance has been struck and there is no justification for forcibly relocating the salmon farm installation. We also note your point in para 127 that the hill path from Bracorina to Stoul offers fine high level views over Loch Nevis. Respectfully, these views do not include the inshore area around Ardintigh where my two seabed leases are located. I can also advise that less than a handful of walkers visit the 400m viewpoint above Stoul annually as it is located well off the hill path.	The draft plan did not seek to force relocation of the salmon farm. It encouraged a moderate reduction in the overall scale of development in Ardintigh Bay – either finfish or shellfish – which could be achieved by relocating some of the production to sites nearby.
Area Policies: Area F	Tom McClean Enterprises	I cannot overemphasise my concern that to meet the objectives set out in paragraphs 131 and 132 would have a substantial and adverse impact on my family's livelihood and on the wider economy. I agree with your broad aims but I go back to your point in para 126 that an acceptable balance is required alongwith careful management. I feel that I have exercised this “careful management”, I have created a livelihood for my family on this remote and fragile rural outpost of Lochaber, and I am anxious that the aims of the Aquaculture Framework Plan should not take this away from me.	Paragraphs 131 and 132 deleted. 3rd bullet point of the main strategy for the loch ("encourages a moderate reduction...middle reaches of the loch") also deleted accordingly.

Topic	Organisation	Comment	Highland Council response
Area Policies: Area F	Scottish Sea Farms	Relocation of Ardintigh finfish production could be investigated but difficult - this is the only one of the 3 sites with real potential under SEPA approved modelling for modest biomass increase. Movement nearer Stoul would be possible and desirable to increase separation from shellfish sites.	Paragraphs 131 and 132 deleted. Potential for modest biomass increase at the Ardintigh finfish site has to be balanced against the concerns expressed (above) about the tight layout there and (below) about visual capacity considerations. Movement of the Ardintigh finfish farm nearer to Stoul would impinge on the amenity of that area which is locally important as a landscape feature and as a destination for walkers and canoeists.
Area Policies: Area F	SNH	In Paragraph 132 the plan states that the expansion of the existing finfish sites between Earnsaig and Stoul will only be favoured if it involves a corresponding scaling down of the finfish farm in Ardintigh Bay. If the implication is that the development is at full capacity in terms of visual impacts then SNH also support this statement, but the plan should make the reason(s) for the statement clear.	SNH's assessment that the developments at Ardintigh are at full capacity in terms of visual impact is noted for future reference. However, paragraph 132 deleted because the management of the sites between Earnsaig and Stoul is outwith Mr McClean's control.
Area Policies: Area G	Strutt & Parker LLP	Area G (majority of adjacent land owned by a Strutt & Parker client): strongly support presumption against any development.	Support noted.

Topic	Organisation	Comment	Highland Council response
Appendix 1	Scottish Sea Farms	IN - 33 - 3 Earnsaig & Stoul each have consent for square & circular cage alternatives (12 x 24m or 10 x 27m square cages, 18 x 70m or 14 x 80m or 9 x 100m circular cages). At present Earnsaig has 9 x 100m circular cages, and Stoul has 12 x 80m circular cages. IN - 42 - 3 Ardintigh has consent for square & circular cage alternatives (8 x 24m or 6 x 27m square cages, 12 x 70m or 9 x 80m or 6 x 100m circular cages). At present Ardintigh has 9 x 80m circular cages. No contact received from Scottish Government to date regarding planning review process for these sites.	Noted
Strategic Environmental Assessment: Environmental Report	SEPA	Having done a high-level assessment of alternatives we would have expected you to assess the individual aspects of the Plan which could have significant effects. This issue was highlighted at the scoping stage and in this specific instance would mean assessing the Plan's six objectives and area policies. This has not been done and as a result the opportunity to use SEA to improve the Plan has not been taken, which is disappointing. We would be very concerned about this lack of assessment if it were not for the fact that we agree that the Plan is unlikely to have significant negative effects on the environment and consider that the Plan itself adequately covers the issues which we are interested in.	SEA process being refined by coastal team.