

LOCH SUNART



AQUACULTURE FRAMEWORK PLAN CONSULTATION REPORT

AUGUST 2004

1.0 BACKGROUND

- 1.1 Highland Council is currently revising and expanding its series of aquaculture framework plans and Loch Sunart was identified in the early stages of this process as one of the areas where the existing framework plan published in 1988 required revision. Following an initial scoping exercise, the Loch Sunart Aquaculture Framework Plan Consultative Draft was prepared and was circulated for a period of public consultation from April to July 2003.
- 1.2 All comments received as part of the consultation have been appraised and the main issues are outlined below together with a summary of the amendments made to the final document. Full copies of the comments and the responses are set out in Appendix 1 to this report. Any paragraph headings or numbers referred to within this consultation report or its appendix relate to the consultative draft plan although every effort has been made to maintain the same paragraph numbers throughout the final document.

2.0 CONSULTATION PROCESS AND OVERVIEW OF RESULTS

- 2.1 The publication of the consultative draft was advertised in the West Highland Free Press and approximately 80 copies of the plan were distributed for comment. These went to the relevant agencies, fish and shellfish farm operators, landowners, the community councils and interest groups. Copies of the plan were also made available for public inspection at Post Offices and Council Service points. During the consultation period, Council officials gave a presentation to a meeting of the Loch Sunart Community Council. Representatives from the other community councils in the plan area were also invited to attend this meeting.
- 2.2 10 written responses were received comprising over 150 individual comments. No responses were received from other aquaculture regulators, notably SEPA, SEERAD and the Crown Estate, or from any of the four Community Councils in the area.
- 2.3 The ten respondents generally welcomed the preparation of the plan and supported its objectives and it was commended for its clear layout and approach to the issues surrounding aquaculture developments within the loch. The main points raised by the public consultation came from Scottish Natural Heritage, Marine Harvest, wild fisheries interests, SeaFish and the Scottish Landowners Federation. Some further comments came from Ardnamurchan Estate and a resident of Laga Bay. Most of these comments referred to details in the supporting text rather than the detail of the draft policies.
- 2.4 SNH's comments were wide ranging but their main concern was that insufficient reference had been made to the candidate Special Area of Conservation designation which covers the loch and includes reefs and otters. SNH also suggested amendments to some of the area policies in order to take greater account of the natural heritage interests in the area. They also provided copies of survey data in relation to the cSAC features of interest for incorporation into the final document.
- 2.5 Marine Harvest felt that the plan did not consider the positive impacts of aquaculture in sufficient detail and suggested that more could be made of the employment offered by the farms and the indirect benefit to the community through local spending by fish farm interests. In addition, they took issue with the stated aim of the plan to maintain aquaculture development in the loch at its current level. Whilst they accepted that in visual terms there was little room for expansion, they felt that within the confines of the existing cage infrastructure there was the potential for increasing the level of production. Marine Harvest

also stated that it was their aim to operate on fewer, larger sites in order to allow economies of scale, and that there were further benefits resulting from increasing automation.

- 2.6 Wild fisheries interests varied somewhat in their responses. The Lochaber and District Fisheries Trust pointed out what they considered to be omissions in the text in that the plan did not sufficiently consider the interaction between finfish farm sites within Loch Sunart and sites in the Sound of Mull, which is considered to be in the same management area. They felt it was important to highlight that the development of new sites outwith the loch might close a “firebreak” which is intended to prevent any spread of disease between adjacent management areas. On the other hand, the Association of Salmon Fisheries Boards offered more general comment relating to finfish farming and the planning process. In relation to wild fisheries interests Ardnamurchan Estate indicated the extent of salmon netting rights within the plan area.
- 2.7 SeaFish made a number of comments relating to the lack of development of the shellfish leases within the loch. At the time of writing, of approximately 8 extant shellfish leases only 1 had any equipment on site and was actively producing shellfish. SeaFish have suggested investigating ways in which these “dormant” leases can be developed for shellfish, including novel production techniques such as submerged longlines.

3.0 CHANGES MADE TO THE PLAN IN RESPONSE TO COMMENTS RECEIVED

- 3.1 **Future prospects for Aquaculture Development:** Amendments made to this section of the plan highlight alternative management regimes that could be employed within the loch and the potential links between the plan area and the wider area of the Sound of Mull. Increasing emphasis is now being placed on fish health issues rather than previously published indicative separation distances and the text has been amended to take this into account.
- 3.2 **Economic Development:** This section of the plan was amended to better indicate the level of downstream employment, the skills base of the core farm staff and the benefits to landlords in terms of rental income.
- 3.3 **Water Quality:** Additional text has been added to this section highlighting that swim-through net changes are carried out on sites within the loch and that this removes the need to use antifoulant chemicals on cage nets. However, swim-through net changes are not currently possible on sites such as Maclean’s Nose which utilise circular cages.
- 3.4 **Nature Conservation:** This section of the plan has been substantially amended to clarify the existing natural heritage designations within the loch as suggested by SNH and to address some of the points raised by Marine Harvest. In relation to this section of the plan the Bibliography now includes reference to the Habitats Directive, the Wildlife and Countryside Act and the Sunart cSAC management scheme which is currently in preparation. Reef and otter survey data submitted by SNH has been used to produce two additional indicative maps in the style of the others within the plan.
- 3.5 **Game Fisheries:** The policy map has been amended to label the game rivers mentioned in the text. In addition more reference has been made to the presence of sea trout in coastal waters and their susceptibility to sea lice. The text now highlights the importance of cage design in minimising the risk of escapes and states that the Council will continue to request site specific escapes prevention and contingency plans when consulted on sea bed lease renewals or modifications.

- 3.6 **Strategy and Area Policies – Policy Zones:** The text of the Strategy and Area Policies section has been amended to include two additional plan objectives: i) safeguard the natural heritage interests of the cSAC, and ii) encourage best practice with regard to fish health, disease control and parasite management. The text of bullet point 4 of paragraph 88 has also been amended to maintain equipment at current levels but to highlight that where environmental considerations allow, there may be the potential for small-scale increases in biomass.
- 3.7 The area policies have been amended in light of SNH’s comments to take the cSAC interests more fully into account and to make the area policies more readable.

Appendix 1:

Tabulated Comments, Responses and Amendments
Resulting from Public Consultation on:

**Loch Sunart Aquaculture Framework Plan
Consultative Draft**

Issue	Paragraph	Organisation	Comment	Response
General		Scottish Natural Heritage	In general, Scottish Natural Heritage (SNH) feels that this document is a significant step forward in setting a strategic framework for any future aquaculture developments in Loch Sunart, as compared to the existing Framework Plan	Support noted
General		Association of Salmon Fisheries Boards	We welcome moves to develop an aquaculture framework plan for Loch Sunart and compliment Highland Council on this comprehensive report. Aquaculture Framework Plans will provide a vital opportunity to sensibly plan the future sustainable development of the West Coast environment especially given the new planning powers of Local Authorities with regard to the development of marine aquaculture.	Support noted
General		Lochaber & District Fisheries Trust	Lochaber & District Fisheries Trust (LDFT) welcomes the opportunity to comment on the consultative draft of the Loch Sunart Aquaculture Framework Plan. LDFT particularly welcomes the recognition given to the importance of migratory salmonid populations and to the potential for negative impacts on these populations from salmon culture.	Support noted.
General		SeaFish	<p>First of all may I congratulate you on such a comprehensive document. While the issues that confront the development of aquaculture at the present time, and especially finfish cultivation, have been highlighted in the framework plan, and rightly so, they have been covered very fairly.</p> <p>The aquaculture framework plan is a very comprehensive and thorough document that will guide the future development of the industry in Loch Sunart.</p>	Support noted
General		Scottish Landowners Federation	The SLF is happy to support a plan seeking to ensure that future development policy for this area is driven by the need for sustainable economic development across a range of industries, including aquaculture. There has been a history of controversy in relations between some river owners and fish farmers; however the SLF recognises the advances made by the industry in environmentally sustainable practices, the mutual understanding generated through Area Management Agreements, and the improved quality of information from scientific research.	Noted

Issue	Paragraph	Organisation	Comment	Response
General		Association of Salmon Fisheries Boards	Although perhaps of no great relevance to this consultation we would add that for the Highland Council to be able to satisfactorily fulfil their new planning responsibilities and develop, but perhaps more importantly, implement and enforce, these far-sighted sea-loch framework plans, then resources will be required to adequately do so. Given the Council is not a beneficiary of the rental income from these [fish farm] sites, alternative sources of funding will be required to provide the resources to manage these sea-loch framework plans and these planning responsibilities effectively.	Support noted - we have made this point during the various Scottish Executive consultations on locational guidance and the transfer of planning powers.
General		Association of Salmon Fisheries Boards	The Association wishes to draw attention to a number of issues related to aquaculture development on the West Coast (particularly salmon) and also to the relationship of these sea-loch plans to the Tri-Partite Working Group (TWG) and the Area Management Agreements (AMAs) that have resulted from this initiative. The ASFB is an active and founder member of the TWG and plays an important role on both the plenary group and on the management group. The views expressed are those of the ASFB and not of the TWG.	Noted, though comment does not specifically refer to the Loch Sunart Framework Plan
General		Ardnamurchan Estate	I should like to take the opportunity to compliment the authors of this report for its content but would like to point out a few important omissions and errors.	General support and comments noted. See detailed responses to specific points raised.
General		West Highland Anchorages & Mooring Association	Thank you for the copy of the plan which we found to be very comprehensive.	Support noted
General		Atlantic Salmon Trust	<p>The Trust has read the draft Loch Sunart Framework plan with interest, and is grateful for the opportunity to respond to it, with reference to its coverage of salmon farming. The report is most clearly presented in this aspect, and the Trust welcomes the examination of the issues and the thrust of the proposed overall strategy.</p> <p>We are aware of the detailed points discussed by the Association of Salmon Fishery Boards in commenting in the draft, and wish to confirm that the Trust is in full agreement with the views expressed.</p>	Support and agreement with the comments of the Association of Salmon Fishery Boards is noted.

Issue	Paragraph	Organisation	Comment	Response
Foreword		Marine Harvest (Scotland) Ltd	In this section it would be useful to have mention of the Scottish Executive's aims raised in the Strategic Framework for Scottish Aquaculture. Perhaps there should also be mention of the desire to sustain local communities with an aspiration of economic prosperity without detriment to the local environment.	Additional sentence added to the end of paragraph 2 of the Foreword reading "In addition the plan recognises the provisions of guidance and strategy documents produced by the Scottish Executive at national level." Strategic Framework for Scottish Aquaculture now mentioned at end of Paragraph 6. See response to comment by SNH.
Introduction	2	Marine Harvest (Scotland) Ltd	Specific clarification of the statement 'number of sites which are available for further development are however limited' is required	Text amended to read 'number of sites available for new developments are however limited' If aspects such as SAC reef interests, cumulative visual impact and overall water quality are taken into account, there are no obvious opportunities for large new aquaculture developments within the loch.
Introduction	2	Marine Harvest (Scotland) Ltd	'for more than twenty years' could be 'for almost 25 years' as the first input of smolts to Loch Sunart was at Achleek in April	Paragraph 2 amended to read 'for almost 25 years'.
Introduction	4	Lochaber & District Fisheries Trust	Fin-fish operations in Loch Sunart may be influenced by aquaculture activity outside the loch e.g. in the Sound of Mull. This is alluded to in a number of sections of the Plan (e.g. paragraph 82). LDFT suggests that linkages to areas not covered by the Plan is recognised explicitly via a clear statement under paragraph 4 along with a clear statement that these linkages shall be considered in future planning of aquaculture operations.	Additional paragraph added to the end of the introduction section reading: "Although the area policies relate directly to the areas depicted in the policy map it is important to recognise that finfish farming within the plan area may also influence or be influenced by fish farming activities and site locations outwith the loch, these cumulative impacts must be taken into account in considering applications for modifications to existing leases and lease renewals.
Planning Policy Background	5	West Highland Anchorages & Mooring Association	It seems surprising that the loch is classified as Category 3 when it is to be a Marine SAC and to include some SSSIs.	This reaction is understandable because the basis for classifying areas in the National Locational Guidance changed to a narrower focus in January 2003. However the text of the Framework Plan states that the loch's policy classification could change over a short timescale.
Planning Policy Background	6	Lochaber & District Fisheries Trust	Fish health issues are increasingly recognised as being of vital importance in dealing with planning issues. For instance, the requirement for 'disease fire breaks' between adjacent management units has clear implications for the location of new sites. A clear statement recognising the importance of fish health issues and 'fire breaks' should be inserted under Planning Policy Background.	Disease firebreaks and indicative separation distances are covered in paragraph 32. See response to comments from Marine Harvest (Page 11) for revised text.

Issue	Paragraph	Organisation	Comment	Response
Planning Policy Background	6	Marine Harvest (Scotland) Ltd	<p>The Framework suggests that the classification will suddenly change. This is unlikely to be the case; a change in classification would require a sudden and dramatic increase in aquaculture pressure or physical change in loch surface area, depth, volume of flushing rate. The former is highly unlikely to take place and the latter is impossible.</p> <p>FRS using simple Gowesian models for benthic impact and equilibrium concentration models for DIN calculates the classification of the Loch, for the latter predicted values are supported by field data. For the HC to suggest that FRS monitoring would trigger a change in category would only be the case if the systems DIN or benthic degradation values were just below the cat 3/cat 2 boundary, having a combined index value of 4. The combined index value of Sunart is 3 suggesting that a considerable expansion of aquaculture would be necessary in order to trigger cat 2 status.</p>	<p>The classification of the loch could change within the lifetime of the plan, as indeed it changed when the revised locational guidelines were published in January 2003. This was due to a revision in the way the classification thresholds were set.</p> <p>The Council does however accept that the classification would be unlikely to change as a result of FRS monitoring as stated in the text of the draft document. Paragraph 6 amended to remove "Should the results of monitoring work by the Fisheries Research Service suggest that this is necessary".</p>
Planning Policy Background	6	Scottish Natural Heritage	<p>We would recommend that it would be useful to make reference to the guidance contained in the 'Marine Aquaculture and the Landscape' publication which was developed by SNH in partnership with Crown Estate and Scottish Quality Salmon.</p>	<p>New paragraph inserted after paragraph 6 to read: "Other documents such as 'Marine Aquaculture and the Landscape' published by SNH also provide guidance in relation to fish farm location and design and should be taken into account when considering the design of any new sites or modifications to existing ones. In addition in 2003 the Scottish Executive published 'A Strategic Framework for Scottish Aquaculture' this sets out several aims for the Scottish aquaculture industry including the desire to sustain employment within rural communities, whilst recognising the environmental constraints within which the industry must operate."</p>
Environmental Impact Assessment	10	Scottish Landowners Federation	<p>Whilst there are stringent EIA regulations applying to marine fish farming developments, shellfish farm leases currently fall outwith the EIA regulations even where there could be visual and other impact issues.</p>	<p>Paragraph 10 amended to read 'Applications for shellfish farm leases do not as yet come within the scope of the Environmental Impact Assessment legislation however shellfish installations, particularly large ones are not without their environmental impacts. Careful consideration needs to be paid to aspects such as equipment design and location, and the minimisation of marine litter for example from detached buoys and ropes.'</p>

Issue	Paragraph	Organisation	Comment	Response
Changes since last framework plan	11	Scottish Landowners Federation	Although employment numbers have declined, there has been significant investment in skills training the Scottish salmon farming industry spends twice the national average on training per person which is of particular importance to a fragile, remote rural economy.	Noted, reference to the training and skills base of fish farm employees has been added to paragraph 12.
Changes since last framework plan	12	Marine Harvest (Scotland) Ltd	Improvements in productivity should also take into account the desire to create larger more efficient farms	Paragraph 12 amended to read "Improvements in productivity, possibly including operation on fewer, larger farms are important for the industry's competitive position. Automation, combined with electronic feedback systems can reduce to quantity of food wasted by finfish farms. This scaling up can generate greater visual and noise impact than was envisaged at the time that the last plan was prepared. Automation can also lead to a reduction in manpower required to operate a farm and the likelihood that local employment opportunities may be reduced. This may be offset to an extent by improvements in the skill base and working conditions of the remaining workforce."
Changes since last framework plan	12	Marine Harvest (Scotland) Ltd	It is true to say that automation, as in every industry, has led to a reduction in manpower but the investment in feeding systems results in a stable, well trained core team.	Paragraph 12 amended to read as above.
Changes since last framework plan	12	Marine Harvest (Scotland) Ltd	Diversification into other species is creating additional jobs	Add to paragraph 13 "diversification into new marine species could potentially lead to additional jobs. However, the limited supply of juvenile fish for ongrowing may prove to be a limiting factor in the short term.'
Changes since last framework plan	12	Scottish Landowners Federation	Para 12 refers to greater noise and visual impact as a result of 'scaling up'. Have noise levels been measured over time? As a result of the increased efficiencies it is our understanding that the same or fewer boats and vehicles are being used to produce larger quantities, and that the number/area of cages remain constant. In which case, will there be 'greater visual intrusion'? Responses to enquiries about farmed marine species indicate that halibut require a greater surface area and, if visual intrusion is a factor, then perhaps this should be mentioned.	<p>The reference to noise impact relates to background noise levels from automated feed barges. These structures also add to the overall visible mass of fish farms and may or may not have significant visual impact depending on the site. It is accepted that ephemeral sources of noise (i.e. boat traffic and vehicle movement) may be reduced by automation.</p> <p>The fact that a greater cage area is required to farm halibut when compared to the same biomass of salmon is discussed elsewhere within the document.</p> <p>Text of paragraph 12 has been amended - see responses made in relation to comments by Marine Harvest.</p>
Objectives	14	Marine Harvest (Scotland) Ltd	Another objective should be to safeguard/expand employment prospects in a remote fragile area while supporting an important Scottish industry	Additional objective added to paragraph 14 stating "sustain and if possible improve employment prospects in this area"

Issue	Paragraph	Organisation	Comment	Response
Objectives	14	Scottish Landowners Federation	Responsibility for safeguarding tourism and recreational assets should rest in a loch users' association as exemplified in Area Management Agreements between fisheries and aquaculture. Their success lies in their voluntary nature.	Responsibility for safeguarding tourism and recreational assets (which includes natural heritage assets) rests with a wide spectrum of interests, loch users, local residents, public bodies and development agencies. AMA's are not comparable because they are essentially agreements between finfish farming interests and riparian/ game fishing interests and operate under confidentiality agreements. We remain of the opinion that AMA's should be compulsory and in the public domain.
Scale of Aquaculture Development and Potential	21	Scottish Landowners Federation	It would be useful to add information on the current number of active and 'mothballed' sites, and the percentage of the coastline that has been physically developed.	This is information which is likely to go out of date quite quickly and almost certainly within the lifetime of the plan. It is not clear what advantage would be gained by including a note of the percentage of the coastline that has been physically developed.
Scale of Aquaculture Development and Potential	21	Marine Harvest (Scotland) Ltd	It would be helpful to see how the current development in the loch compares to the historical development.	Paragraph 21 of the draft highlighted the number of leases and operators of both finfish and shellfish farms in the loch at the time that the last plan was written and compared it to the existing, developed leases. Text amended to add 'historically many of the finfish leases operated with considerably more cages than are currently employed, and on many sites permissions remain for much greater cage areas than are currently used.'
Scale of Aquaculture Development and Potential	22	Marine Harvest (Scotland) Ltd	The sites at Achleek and Invasion Bay now have 20 fish pens each Three C-CAP feeding systems are installed at Camus Glas, Invasion Bay and Achleek The sites at Oransay, Laga Bay and Glenmore each have smaller raft based feeding systems Salmon farmers in Loch Sunart pioneered the best practice development of single year class management with contiguous fallowing. This practice has now been operating for 12 years The salmon lease at Camus a Choire has never been used as a production site	Information noted with thanks, and incorporated into revised text where possible.
Present Development - Shellfish	25	SeaFish	Many of the sites leased for oyster and scallop production are also under-utilised at present even though there are sites with potential opportunities for the culture of oysters on trestles or directly on the foreshore. Since there is an issue with leased sites not being cultivated, could the lease for a site be reviewed on a regular basis (3-5 years for example) and withdrawn before the intended renewal date if the site was not being used for the purpose intended in the lease? This would help to encourage the proper utilisation and management of aquaculture sites in Loch Sunart.	See response to previous comment from SeaFish in relation to this issue.

Issue	Paragraph	Organisation	Comment	Response
Present Development - Shellfish	25	SeaFish	Many of the sites in Loch Sunart leased for shellfish cultivation are not active at present and this is a major disappointment given the potential that there is for the production of shellfish in Scottish waters, especially rope-grown mussels. This sector of the industry has gone from strength to strength in recent years with annual production of mussels now in excess of 3000 tonnes. Seafish has clearly identified good business opportunities for this sector in particular and would welcome the opportunity to work with the Highland Council and local growers to develop sites in Loch Sunart. Getting inactive sites back into mussel production should be a high priority using standard cultivation technology or novel systems such as submerged rafts.	We agree that the underuse of shellfish leases is disappointing and it is an issue that is being encountered in many of the sea lochs in Highland. Through discussions with the Crown Estate and by recommending additional conditions on new shellfish leases the Council is investigating ways in which this situation may be rectified. Text of paragraph 31 amended to include the sentence ' Many of the more suitable sites are occupied by existing but unutilised shellfish leases. There is potential for these leases to be brought into production either with more tradition equipment such as longlines or rafts or with novel equipment such as submerged longline systems. All existing shellfish leases that have not been taken up, or have not been used within two years should be relinquished. Any resultant debris should be removed from the seabed, and the sites should be made available for local community interests.'
Future Prospects for Aquaculture Development	26	Marine Harvest (Scotland) Ltd	Further expansion of finfish and shellfish should be allowed where environmental data supports expansion	Environmental data in support of an individual application for expansion may not provide sufficient justification in itself. The cumulative impacts of all the installations within the loch need to be taken into account.
Future Prospects for Aquaculture Development	26	Marine Harvest (Scotland) Ltd	For Marine Harvest the trend will be towards fewer but larger farms	Noted. It would be useful if Marine Harvest could provide an indication of which sites are likely to be relinquished and which sites will be the subject of expansion applications. The Council recognises that there may be economic and in some cases environmental benefits resulting from operation on fewer larger farms. There are however concerns that increased cage and site sizes may lead to an increased risk of disease transfer within a site and reduced ability to effectively monitor and treat sea lice. There is also the possibility that adverse effects such as storm damage, jellyfish blooms or pollution events may result in a greater loss of fish on larger sites. An alternative strategy may be to retain smaller sites and to operate in such a way as to produce fewer high quality fish.

Issue	Paragraph	Organisation	Comment	Response
Future Prospects for Aquaculture Development	26	Scottish Natural Heritage	<p>This is a useful section of the plan which seeks to set the policy framework which operators must have regard to when considering new developments or changes to existing operations. As you are aware, and is highlighted in subsequent sections of the Framework Plan, Loch Sunart from Maclean's Nose to Auliston Point and its hinterland has been identified as a candidate Special Area of Conservation (cSAC) under the EC Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Flora and Fauna (the Habitats Directive). The Habitats Directive is enacted in Scotland through the Conservation (Natural Habitats, &c.) Regulations 1994 and policy guidance is contained in the Scottish Executive Revised Circular 6/1995.</p> <p>The sites status as a cSAC is likely to have a bearing on the location and types of aquaculture facility within the loch, so we would recommend that the policy/regulatory background to the designation could usefully be included in this section. SNH can provide assistance with the wording of such a section should it be required.</p>	<p>Comments noted. The inclusion of the policy background to the cSAC designation would not however be appropriate in the section headed "Future Prospects for Aquaculture Development" It may make the plan text overly cumbersome and will duplicate some of the SAC Management Scheme which is currently in preparation. Nature conservation issues, including the cSAC designation, are fully dealt with in paragraphs 65 – 72. Bibliography amended to include references to the Habitats Directive and the Wildlife and Countryside Act.</p>
Future Prospects for Aquaculture Development	26	SeaFish	<p>The cage infrastructure lends itself to the possible rotation of sites for salmon and new marine species. However, if a single Area Management Agreement (AMA) is being proposed for Loch Sunart, there may be a potential problem associated with the length of the crop cycles of the different species. Salmon will be ready for market in around 18 months, whereas cod would take two years and halibut three or more. Much depends upon the assumption inherent within the design of the AMA, and specifically whether it is desirable to achieve a whole-loch synchronous fallow. This would clearly be difficult for a mixed species situation over the duration of one salmon cycle. There may be other solutions, however. For example, two crops of salmon could be produced alongside one of halibut followed by a fallowing period.</p>	<p>The Area Management Agreement is discussed in paragraphs 81 and 82. Text of paragraph 82 amended to add " Within Loch Sunart and other lochs with mixed species whole-loch fallows may be problematic as a result of the different growing cycles for the marine species when compared to salmonids."</p>
Future Prospects for Aquaculture Development	26	Marine Harvest (Scotland) Ltd	<p>We disagree with the comment that 'sites which are overviewed at close quarters are particularly sensitive in this respect and where possible should be avoided.' In our experience we have not received any adverse comment on the location of our farms, where they are overviewed, either in Loch Sunart or in other lochs. From general public feed back at farm open days, the most recent being held at Achleek on Saturday 21 June, any comments relating to appearance suggested farms added interest in the landscape.</p>	<p>Disagreement noted, however in recent years the Council has received a number of complaints with regard to fish farm installations, feed barges and shore bases. In our experience high-visibility sites tend to cause the most concern (though this depends on the context) closely followed by those located in areas previously valued for their unspoilt nature. The views of people who attend farm open days may not be representative of the community as a whole on this subject. Text of paragraph 26 reworded to read "Sites which are overviewed at close quarters may be sensitive."</p>

Issue	Paragraph	Organisation	Comment	Response
Future Prospects for Aquaculture Development	28	SeaFish	<p>Opportunities for the cultivation of new marine finfish species have been identified in the draft framework plan. Again, I think you should be congratulated on taking this initiative.</p> <p>Approximately 74,000 square metres are available in Loch Sunart for the cage production of fish. It is interesting to speculate that such an area could in theory produce 2,200 tonnes of halibut or 7,000 tonnes of cod per year, allowing for a three year crop cycle for the production of halibut or a two year crop cycle for cod respectively. In practice, of course, salmon production in combination with some marine finfish production is the most likely scenario, and in any event such decisions are very much a matter for the commercial companies which are operating in the area. Most of the finfish sites operate 15m x 15m or 16m x 16m cages and many of the existing sites (with 20 or more cages) could be used to produce a single crop of around 500 tonnes of halibut, depending upon the degree of shelter each site has.</p>	Support and information noted.
Future Prospects for Aquaculture Development	28	Lochaber & District Fisheries Trust	Novel rotation and fallowing regimes involving non-salmonid species must be subject to appropriate fish health controls	Accepted
Future Prospects for Aquaculture Development	28	Marine Harvest (Scotland) Ltd	Servicing of more exposed sites will require the use of equipment that may be more visual but not necessarily noisy	The reference to noise impact was included in the draft on the basis of comments received from the public when the C-Cap automated feed barges were first introduced to the loch. Following discussion with the manufacturers of the feeding barges the Council accepts that any noise impact associated with the use of the feed blowers and generators is dramatically reduced through the use of acoustic hoods on these items of equipment. When consulted on the installation of feed barges the Council will stipulate that it should be a condition of use that acoustic hoods are installed. New sentence added to paragraph 29: " The noise which has been associated with automated feed barges can however be reduced through the use of acoustic hoods on generators and associated machinery. The use of automated feeding systems may reduce the frequency of boat movements."
Future Prospects for Aquaculture Development	28	Marine Harvest (Scotland) Ltd	Supporting evidence for the statement on location is required	Not clear which statement on location is being referred to.
Future Prospects for Aquaculture Development	28	Marine Harvest (Scotland) Ltd	A halibut farm currently needs twice the surface area of a salmon farm to produce the same tonnage	Accepted. Text of paragraph 28 amended to include this information. Sentence beginning "This behaviour..." altered to read " This behaviour also means that a halibut farm currently needs twice the surface area of a salmon farm to produce the same tonnage".

Issue	Paragraph	Organisation	Comment	Response
Future Prospects for Aquaculture Development	28	Marine Harvest (Scotland) Ltd	All the salmon farms within Loch Sunart are operated on an 'all in, all out' basis and have been for over 12 years. Best practice in this area is being undertaken which is reinforced by the quality of seabed monitoring results	Noted. Whilst the Council would agree we agree that the all-in-all-out approach for salmon represents best practice, a whole loch fallow period is not achievable due to the longer growth cycle of halibut. This is an issue which would need to be addressed in the event that it becomes feasible to farm halibut in Loch Sunart again in the future.
Future Prospects for Aquaculture Development	29	Scottish Landowners Federation	It would be valuable to seek expert opinion from Fisheries Research Services (FRS) so that guidelines on distances required for the siting of farms close to river mouths can be established. Whether automated feed barges lead to increased visual and noise impact is debatable. Frequent feed deliveries by boats to cages are avoided, visually intrusive feeders have been removed from handrails and the new feed barges have much of their moving parts within soundproofed containers inside the structure.	We await, long-promised Scottish Executive guidelines on the location or relocation of fin fish farms in relation to river mouths. We have used 1km zones around the mouths of rivers for the purposes of illustration on the policy map but this is simply to flag up the sensitivity of game rivers rather than to indicate a zone of effect. This is consistent with the Councils other Aquaculture Framework Plans. See response to Marine Harvest comment on noise from feed barges.
Future Prospects for Aquaculture Development	29	Lochaber & District Fisheries Trust	New sites should not be located in existing disease fire breaks. If fire breaks are bridged, all sites with recognised hydrographic linkages should operate under the principle of single bay management with synchronous stocking and fallowing periods.	Accepted
Future Prospects for Aquaculture Development	29	Marine Harvest (Scotland) Ltd	What distance is being proposed from the entrance to important game fishing rivers?	The distance is dependent on site-specific hydrographic conditions and the Council would have to be guided on a site-by-site-basis by SEERAD. The zone surrounding river mouths marked on the policy map is there to highlight the river mouths rather than to set out any kind of exclusion zone.
Future Prospects for Aquaculture Development	30	Scottish Natural Heritage	This section mentions the potential requirement for an Environmental Impact Assessment (EIA) for new or modified aquaculture facilities. However, there is no mention of the need to assess the potential impact of the proposals on otter and reef cSAC interests, as set out in the Revised Circular 6/1995. This would apply to changes within the cSAC and also adjacent to the cSAC where features within the designated site could be impacted, irrespective of the requirement for an EIA.	New text added to paragraph 30: "The Marine cSAC designation requires that the potential impact of new or modified fish farm installations on the otter or reef interests should be assessed. This would apply to changes within and adjacent to the cSAC where features within the cSAC would be affected, irrespective of the requirement for an EIA."
Future Prospects for Aquaculture Development	31	Marine Harvest (Scotland) Ltd	What criteria have been used to determine the suitability of sites for the longline or raft culture of mussels?	Shelter, water depth, distance from habitation and prominent viewpoints, potential for obstruction to moorings, jetties and recognised viewpoints.

Issue	Paragraph	Organisation	Comment	Response
Future Prospects for Aquaculture Development	32	Marine Harvest (Scotland) Ltd	<p>"Poorly flushed upper basins"</p> <p>Although poorly flushed certain areas of Loch Sunart are subject to elevated current velocities as a result of constricting current velocities. This is certainly the case for the sites situated around Laga Bay. The 8km separation distance is an early recommendation from the CEC and although such separation distances are likely to be of some benefit, the main control of potential environmental impacts are likely to be synchronised production, strategic treatments, and appropriate position of farm sites. Where these key factors are in place farms closer than 8km should not be prejudiced at the time lease renewal. In our opinion these factors have not been given the recognition that they deserve.</p>	<p>The Council does not consider Laga Bay to be in one of the upper basins of the inner loch. Whilst accepting that surface water movement may be increased by constrictions in loch depth and width such as the sills and narrows, these tidal streams are reduced as one moves further away from the restriction, resulting in low-energy environments such as the muddy basins. It is interesting to note that the models used to determine the classification of the sea lochs in the revised locational guidance take no account of narrows and sills or areas of poor water exchange such as deeper basins, considering each loch to consist of a single basin.</p> <p>The Council acknowledges that the revised (2003) locational guidance no longer incorporates the Crown Estate's indicative separation distances and acknowledges the benefits of strategic sea lice treatments, single-year-class production, whole-loch fallow periods and techniques such as swim-through net changes where appropriate. However, water quality issues aside, the cumulative effect of fish farm developments is greater for a given number of sites if they are placed closer together. From this broader point of view the Council considers that its comments are reasonable.</p>
Future Prospects for Aquaculture Development	32	SeaFish	<p>A subgroup of the Aquaculture Health Joint Working Group has been preparing a report on species interactions that is soon to be published, and this may serve to guide further refinements of the management strategy plan for Loch Sunart. The aquaculture industry is currently drawing up a Code of Practice for Scottish Finfish Aquaculture, and this will also help to advise the aquaculture industry, as well as its managers and regulators, in order to minimise potential health risks and welfare issues.</p>	<p>Information noted. See response to comment from Marine Harvest below.</p>

Issue	Paragraph Organisation	Comment	Response
Future Prospects for Aquaculture Development	32 Marine Harvest (Scotland) Ltd	The guidance on separation distances between farms was brought in before a successful furunculosis vaccine was introduced and before single year class stocking (single bay management) was developed. At that time the guidance was sensible but today could now be considered as less appropriate with improved health management and single year class stocking being almost an industry standard	<p>The latest Locational Guidelines for the Siting of Marine Fish Farms in Scottish Waters reduce the emphasis on indicative separation distances between finfish sites. However, the guidance is lacking in relation to separation between other combinations of sites such as finfish and shellfish or shellfish and shellfish sites. In this situation the Council will continue to be guided by the published separation distances until such time as further guidance is forthcoming.</p> <p>The Crown Estate (TCE), which acts as landlord in relation to seabed leases produced indicative guidance in the late 1980's as to the minimum separation distances that should exist between fish and shellfish farm sites and between these and various other interests. This guidance recommended a minimum distance between finfish farms of 8km which is less relevant today with the advent of single year class stocking. Between a finfish farm and a shellfish farm the recommended separation is 3kms and between two shellfish farms 1.5kms though it is acknowledged that closer siting may be possible between small scale-farms and in large loch systems or open water. This was based on a range of factors including amenity considerations and was subsequently included in the Scottish Executive's 'Locational Guidance for the Authorisation of Marine Fish Farms in Scottish Waters' published in 1999. The revised locational guidelines published in 2003 placed greater emphasis on the hydrographic separation between fish farming management areas and the maintenance of firebreaks between adjacent management areas as a mechanism for preventing the spread of disease. Information on the location of management areas is published by the Marine Laboratory Aberdeen on behalf of SEERAD. When consulted on seabed lease applications the Council are reliant on the advice received from SEERAD in relation to management areas. Potential health risks and welfare issues may in the future also be reduced through the implementation of an industry wide code of practice for Scottish Finfish Aquaculture. "When leases expire or are the subject of applications for renewal the opportunity should be taken to increase site separation where necessary and appropriate. This is of particular relevance to the upper basins of the inner loch which are more poorly flushed."</p>

Issue	Paragraph	Organisation	Comment	Response
Future Prospects for Aquaculture Development	32	Scottish Landowners Federation	Any suggestion that consent renewals are tied to greater separation distances should take into account improved understanding of the impact of fish farming, as well as advances in operations which have led to reduced environmental impact. Expert opinion should be sought as there may be a case for reducing the distances to create improved efficiencies for farms, and to leave greater open spaces between pairs of farms.	Noted
Future Prospects for Aquaculture Development	32	Marine Harvest (Scotland) Ltd	Separation distances between salmon farms and shellfish farms should also be re-examined	Accepted. This is particularly relevant in light of the recent interest in polyculture, and is a point which the Council made to SEERAD during the consultation on revising the locational guidelines.
Future Prospects for Aquaculture Development	33	Scottish Natural Heritage	SNH would be cautious regarding the promotion of abalone cultivation in Loch Sunart due the potential with rising sea temperatures for the species to breed. Juvenile abalone are known to feed on certain types of crustose red algae and we would be concerned that there could be a risk of cultivated abalone from Sunart impacting on the nearby maerl beds within the Sound of Arisaig.	The framework plan does not promote the culture of abalone within Loch Sunart, it simply highlights the work that the Council has been involved regarding alternative aquaculture species. New sentence added at the end of paragraph 33 reading: "The introduction of any non-native species to the loch for aquaculture purposes should be carefully evaluated beforehand and if possible avoided."
Future Prospects for Aquaculture Development	34	Lochaber & District Fisheries Trust	It should be stated that further development of fin fish farming must take into account current advice on best practice with regard to single bay management, disease controls and integrated pest management strategies. This is essential to ensure that new developments do not conflict with the optimum operation of existing developments.	Noted. The Council seeks, through the Environmental Impact Assessment process to ensure that fish farms operate within current best practice guidelines. Any additional guidelines introduced during the lifetime of the plan will also be taken into account.
Economic Development	35	Marine Harvest (Scotland) Ltd	You may also be interested to know that of the 30 staff we have employed on Loch Sunart there are three volunteers in the fire brigade, three in the coast guard and two Community Councillors. Quite often the community contribution from aquaculture is overlooked and we therefore believe it is important to highlight this fact.	Noted.
Economic Development	35	Marine Harvest (Scotland) Ltd	The main benefits accruing with the use of feeding systems are that manual handling is reduced and staff occupational health improves, feed deliveries are made by sea removing the need for road haulage on single track roads, on filling the feeding systems all feed packaging is removed by the delivery boat and computerised feeding and monitoring results in less impact on the sea bed through an improved Feed Conversion Ratio.	Sentence added to Paragraph 35: "However automated feeding systems have brought certain environmental benefits e.g. reduced impact on the seabed and local roads."

Issue	Paragraph	Organisation	Comment	Response
Economic Development	35	Marine Harvest (Scotland) Ltd	The reduction in staff numbers is a result of increasing efficiency brought about particularly with the introduction of feeding systems. The installation of this equipment is essential for the Scottish industry if we are to compete successfully with other salmon farming nations	Last sentence in paragraph 35 amended to read " This decrease reflects..." rather than "may reflect."
Economic Development	36	Marine Harvest (Scotland) Ltd	Within the local economy landowners also benefit from the rents derived from shore bases which in some cases will make a considerable contribution to estate incomes	New sentence added to paragraph 36: "Fish farm shorebases also generate rental income for local estates."
Economic Development	36	Scottish Landowners Federation	It would be useful to include the multiplier effect of the 30 FTE jobs in finfish aquaculture: it may be as many as a further 150 (x5 multiplier).	If SLF can provide a reliable independent source for this multiplier data it could be mentioned in future plans.
Economic Development	38	Scottish Landowners Federation	Income from aquaculture shore leases is frequently an important part of landowning businesses, providing a regular source of income that sustains other estate interests which may otherwise not be viable because of seasonal fluctuations.	See response to Marine Harvest's comment on paragraph 36.
Landscape and visual amenity	43	Marine Harvest (Scotland) Ltd	The last sentence in this section is puzzling where specific reference is made to close proximity to the Glencripesdale woods SSSI; virtually the whole area around Loch Sunart is designated as a SSSI	Noted - This issue was also highlighted by SNH. Final sentence of paragraph 43 deleted.
Landscape and visual amenity	44	Laga Bay Resident	I have been fortunate enough to know the Sunart area for more than 30 years and, recently, to build a house at Laga Bay, Ardnamurchan. I know therefore that it is unnecessary to dwell on the outstanding natural beauty and environmental richness of the area. These combined advantages are such as to ensure that Sunart stands comparison with, for example, Loch Maree and place this great and historic sea loch among the finest examples of scenery Scotland has to offer.	Local pride in the landscape quality of this area is welcome and justifies the Councils proposal to designate the lower reaches of the loch as an AGLV. Loch Maree falls within the Wester Ross National Scenic Area.

Issue	Paragraph	Organisation	Comment	Response
Landscape and visual amenity	44	Laga Bay Resident	<p>Laga Bay is a case in point. It has inherited a fine collection of farm and domestic buildings, a very pretty if currently rather 'lived in' shore and outstanding views across the loch to Morvern, Loch Teacuis and Carna. It also has a fish farm. On the one hand this services cages on the remote and uninhabited shores of Morvern a few minutes away by boat. Associated with this is a certain amount of disruption - particularly noise, mainly of boats and occasionally helicopters, which increasingly replace lorries in providing bulk transport, but nothing at current levels which is conspicuously at odds with the community of Laga and its surrounds as far as I am aware.</p> <p>By contrast the cages in the Bay itself are industrial in scale, highly visible from the road and virtually all homes in the Bay and thus detract considerably from one of Ardnamurchan's small but fine coastal settlements. When building our house at Laga Bay, we came, quite rightly in my view, under quite strict planning restrictions aimed at ensuring that the new house was in keeping with buildings in the area and did not detract from the advantages of it. We also had to ensure a very high grade of water outflow from the house into the bay to avoid pollution. I would urge that in planning the future of aquaculture similar priorities are observed to the benefit of all concerned. In contrast to views often expressed in the local press, I would hope that aquaculture does not have to mean the inevitable destruction of natural beauty and with it the tourist industry. Careful and sensitive planning of the use of the sea bed and shore line is all that is required</p>	<p>One of the key purposes of the framework plan is to guide developers as to the information that they would need to submit as part of their application and how an application is likely to be viewed in a given area of the loch. It does not, however remove the need for each individual application to be considered on a case-by-case basis in the same manner as a terrestrial planning application. In such instances, the likely visual impact of a proposed development as viewed from nearby houses is a key consideration. See proposed amendments to paragraph 44 given in the response to SNH's comments on this section of the text.</p>
Landscape and visual amenity	44	Scottish Natural Heritage	<p>In addition to the visual impact of individual aquaculture installations within the loch, it is also important to acknowledge the cumulative impacts which such facilities have within the landscape. This would include sequential impacts as one travel up or down the loch.</p>	<p>Text of paragraph 44 amended to include reference to the cumulative impacts of aquaculture installations within the loch. After "operators should" in the third sentence, insert: "be mindful of cumulative visual impacts and"</p>
Landscape and visual amenity	44	Scottish Landowners Federation	<p>Whilst the steps proposed to minimise visual impact are appropriate, it is interesting to note that in certain communities, notably the Shetlands, local people have objected to the grey colours used. They have preferred the brighter colours more naturally associated with a busy marine environment.</p>	<p>The Council has received few, if any complaints about the use of muted colours for surface fish farm gear.</p>

Issue	Paragraph	Organisation	Comment	Response
Landscape and visual amenity	44	Scottish Natural Heritage	We would also suggest that there is the potential for tensions between landscape and biological requirements in an area. Whilst the landscape principle that farms should be sited as close as possible to the shore would hold true, this must not be at the expense of impact on sensitive habitats and species such as reefs, particularly if this leads to shallower, less well flushed sites being proposed.	Noted, although this is not made clear in the SNH publication 'Marine Aquaculture and the Landscape'. At the beginning of the second sentence in paragraph 44 which starts "cages should be sited.." insert: "Under normal circumstances". After the sentence which ends "line of the coast", insert "This should not however be at the expense of impact on sensitive habitats and species."
Water Quality	45	West Highland Anchorages & Mooring Association	As you will see from one of the photographs in the enclosed leaflet aquaculture activities can give rise to significant detritus dumped in out of the way spots by unscrupulous operators.	Accepted. Add new text to paragraph 45 reading "Fish and shellfish farms, as well as other marine users, may also impact on their surrounding environment through marine related litter. Operators should make every effort to ensure that any waste such as packaging, or obsolete equipment is disposed of appropriately."
Water Quality	46	Marine Harvest (Scotland) Ltd	Expansion on the comment about adverse effect on water quality would be helpful	The comment is expanded upon later in the same paragraph.
Water Quality	47	Marine Harvest (Scotland) Ltd	The 'large quantities of sea lice associated with caged salmonids' we would suggest that this comment is out of date given the salmon industry's use of Slice.	Not accepted. It is our understanding from information received from the fisheries trusts that while "Slice" is having a definite effect on Sea lice numbers in the first year of stocking, lice are still present in large numbers in the second year. The Council is uneasy about the industry's reliance on medicines in an open-water environment. What is the next step when sea-lice become resistant to "Slice"?
Water Quality	47	Lochaber & District Fisheries Trust	LDFT welcomes the suggestion that availability of effective treatments should set an upper limit on biomass.	Support noted
Water Quality	47	Scottish Landowners Federation	Advice should be taken from FRS, in particular results from the Shieldaig sea trout project. Indications are that SLICE treatments are highly effective and have been shown to have no impact on other commercial marine species. Should there be no overwhelming scientific evidence to support a reduction in biomass, the imposition of restrictive inefficiencies that damage the ability of farms to compete and generate employment and wealth for the community could not be supported.	Noted. Any increase in biomass would have to be seen to be compatible with the cSAC interests of the loch.
Water Quality	47	Marine Harvest (Scotland) Ltd	Reference again should be made that it is the responsibility of SEPA to consent the type and quantity of medicine used just as they do with the tonnage of fish to be held on a farm	It is made clear at the end of the preceding paragraph (46) that it is SEPA's responsibility to consent the type and quantity of medicine used. It should not be necessary to repeat this.

Issue	Paragraph	Organisation	Comment	Response
Water Quality	47	Marine Harvest (Scotland) Ltd	<p>At the inner Loch sites current flow may be too low to allow for adequate medicine</p> <p>This is quite incorrect. Under the Dangerous Substances Directive SEPA is required to carry out appropriate assessment prior to granting discharge consent for a list 2 compound. The Agency has chosen that such appropriate assessment should be site specific modelling of residue fate. Quiescent sites typically have lower volumes of the bath treatments used in the control of sea lice, whilst energetic and dispersive sites have high volumes of bath treatment consent available. Conversely in-feed residues accumulate in the sediments locally around the farm. The total input value (5x maximum site biomass) is tested against the near and far field EQS and worked back from this point maintaining the residue below the Predicted No Effect Concentration. This methodology favours quiescent sites, where medicinal residues are retained within the Allowable Zone Of Effect. Contrary to what is stated by the HC; the situation exists where both low energy and high-energy sites receive adequate but different types of medicinal consent. Should a developer wish to expand a site biomass, then they should be required to submit an ES, which demonstrates that they are able to effectively, control lice.</p>	<p>The Council has previously been advised by SEPA that there are some sites which are so quiescent that it is impossible to consent sufficient bath treatments to be used to treat the full stocked biomass. In this type of situation the Council is of the opinion that the biomass should be reduced to prevent the situation arising where the untreated portion of the stock are able to reinfect the treated portion of the stock with sea lice. The comments assume that in feed treatments have been authorised for all sites and whilst we would accept that this is the case in Loch Sunart, not all sites in Scotland are authorised to use in-feed sea lice medicines. In addition, SEPA has not as yet authorised in-feed medicines for use on marine species.</p> <p>Final two sentences of paragraph 47 amended to read "At large farms in inner-loch sites water flow may be too low to allow for sufficient quantities of bath medicines to be used. Where no alternative in-feed treatment is available consideration should be given to reducing the biomass stocked at the site so that the whole stock can be treated effectively."</p>
Water Quality	48	Marine Harvest (Scotland) Ltd	All Marine Harvest farms within Loch Sunart use the swim through method of net changing which has been the case for almost 10 years	Accepted. However we understand that swim through net changes are not possible on the circular cages such as those intended for the Maclean's Nose site.
Navigation	53	Other Amendments	Anchorage south of Oronsay are well used and there has been displacement of yachts into the loch as Tobermory becomes full. Loch also used by larger cruise vessel such as the Lord of the Isles and the Hebridean Princess.	Replace final two sentences of paragraph 53 with: "The Sound of Mull and Loch Sunart are seeing increasing use from a range of commercial and recreational vessels. Small cruise ships such as the "Hebridean Princess" and "The Lord of the Isles" visit the loch regularly during the summer months. There is also increasing pressure on sheltered anchorages such as south of Oronsay when the nearest marina, Tobermory, becomes full. Given the likely future increase of recreational water use it is important that all aquaculture installations are appropriately marked to ensure safe access to recognised moorings and anchorages at all times of day and night." Add additional photo showing cruise vessels in outer loch, taken from Drimin Estate.
Infrastructure	55	Marine Harvest (Scotland) Ltd	Camus Glas, Invasion Bay and Achleek all have C-CAP feeding systems that receive feed deliveries by sea thereby greatly reducing the need for road transport to these sites	Accepted.

Issue	Paragraph	Organisation	Comment	Response
Landing Facilities	60	Marine Harvest (Scotland) Ltd	Public access over fish farm slipways can be gained by contacting the appropriate farm manager; currently we have prawn boats, sea anglers and the small Tobermory ferry using our slipways and pontoons on an occasional basis.	Noted, although the availability of the slipways to the public is not widely advertised.
Landing Facilities	60	Scottish Natural Heritage	We would suggest that some of the existing shore-based facilities for the aquaculture industry have a significant landscape and visual impact. These impacts should be reduced where the opportunity arises	Amend Paragraph 44 to acknowledge that shore based facilities should be sympathetically designed and located as well as water-based structures; i.e. in the last sentence of paragraph 44, after "storage rafts" insert a comma then " and shore - based facilities - all of"
Inshore Fishing	64	Scottish Landowners Federation	There do not appear to be any suggestions for the sea fisheries, in particular the debate between static and towed gear. The example of Torridon should be studied to see how the significant damage caused to the seabed and stocks of shellfish can be reduced or mitigated.	The purpose of an aquaculture framework plan is to guide the development of aquaculture so that it takes into account other interests. Inshore fisheries management is outwith the scope of a plan like this but it may be addressed in the future via fully integrated coastal zone plans. The latter are more ambitious in scope so require more resources to prepare.
Nature Conservation		Scottish Natural Heritage	We would suggest that it would be useful if the Framework Plan contained a map showing the distribution of reef habitats, and perhaps other sensitive areas within the loch as the presence of this habitat and species is likely to be one of the key natural heritage factors in future aquaculture developments in Sunart, as discussed more fully below.	Noted. Document amended to include maps now provided by SNH.
Nature Conservation		Scottish Natural Heritage	We would recommend that scientific names should be highlighted in the text using italics.	Text amended to put scientific names in italics

Issue	Paragraph	Organisation	Comment	Response
Nature Conservation	65	Scottish Natural Heritage	<p>This section of the Plan is somewhat confused and we would suggest contains inaccurate information which is not relevant to the current document. We would suggest that this section should refer only to the site designations which are currently in place. As the enclosed map shows, the Sunart Site of Special Scientific Interest (SSSI) stretches from Auliston Point in the south, taking in Loch Teacuis, forming an unbroken area through to the west of Maclean's Nose. This SSSI has been designated for a range of upland, woodland, grassland, intertidal habitats and individual plant and animal species. The SSSI underpins the terrestrial component of the Sunart cSAC.</p> <p>The cSAC has been recommended to the European Commission as it contains the following habitats and species which are listed on Annex 1 and Annex 2 of the Habitats Directive:-</p> <ul style="list-style-type: none"> ·Old Oak Woodland with <i>Ilex</i> and <i>Blechnum</i> in the British Isles ·<i>Tillio-Acerion</i> woodlands ·North Atlantic Wet Heath ·Dry Heath ·Reefs ·Otter (<i>Lutra lutra</i>) 	Paragraph 65 amended to read "There are a range of nature conservation designations within the plan area which cover both the marine and terrestrial zones. In aquaculture terms the most significant is perhaps the candidate Special Area of Conservation which encompasses both marine and terrestrial features of interest. These include reefs in the marine environment and otters in the marine and terrestrial environments. Terrestrial species and habitats include Old Oak woodland with <i>Ilex</i> and <i>Blechnum</i> , <i>Tillio-Acerion</i> woodlands, North Atlantic Wet Heath and Dry Heath. In addition the whole of Loch Sunart and Loch Teacuis are designated as a marine consultation area. The areas of these designations are shown in figure 3".
Nature Conservation	65	Scottish Natural Heritage	In this paragraph, mention is made of the evolving nature of the arrangements for managing the interest features with the area with nature conservation designations. We would suggest that specific reference should be made to the Management Forum and the development of the Management Strategy for the cSAC	Accepted, Specific reference to Management Forum and Management strategy included in a revised paragraph 66
Nature Conservation	66	Scottish Natural Heritage	We would suggest that it is misleading to refer to 'geological reefs'. In terms of the designations around Sunart, geological interest is restricted to the terrestrial environment. The definition of 'reefs' in the Habitats Directive refers to intertidal, subtidal and biogenic reefs.	Accepted, text of paragraph 66 amended to read " Sunart cSAC includes the whole of the marine section of the loch, with the marine features of interest being otters and the intertidal and subtidal biogenic reefs found throughout the loch. A management scheme for the cSAC is in preparation through the Sunart cSAC Management Forum. This forum comprises representatives of the statutory bodies having a role in the management of the cSAC, local communities, landowners and users of the area."
Nature Conservation	67	Scottish Natural Heritage	We would suggest that reference in the opening sentence of this paragraph should refer to the 'international importance' of the nature conservation interests, rather than the European importance	Noted, text amended as suggested

Issue	Paragraph	Organisation	Comment	Response
Nature conservation	67	Scottish Natural Heritage	<p>The references which are made in this section to the 'appropriate assessment process' are not accurate. The reference to Competent Authority in the text is slightly misleading as this refers only to the terrestrial part of a cSAC. In the marine context the correct term would be Relevant Authority. The Competent Authority/Relevant Authority for any proposed change within a cSAC is not usually SNH, but the body which regulates through licence, lease, etc the activity being applied for.</p> <p>Therefore, in planning application cases the Competent Authority would be the Highland Council and in the case of marine discharges the Relevant Authority would be SEPA. The Competent Authority/Relevant Authority has to consult SNH on any proposal affecting a cSAC and have regard to the advice given when coming to a decision.</p> <p>Not all proposed development will require the Competent Authority/Relevant Authority to undertake an 'appropriate assessment'. Only where the Competent Authority/Relevant Authority concludes that a significant impact is likely due to the proposal is an appropriate assessment required.</p>	Text amended to clarify the situation with regard to the marine portion of the SAC Delete the third sentence in paragraph 67 which begins "This means.." and substitute the following: "This means that proposed developments within the cSAC which are likely to have a significant impact on the designated interest will require an appropriate assessment. The judgement on this will be made by the relevant authority which grants permission, advised by SNH."
Nature conservation	68	Scottish Natural Heritage	<p>Loch Sunart was listed as a Marine Consultation Area in 1990. We would suggest replacing the following sentence for those in the Plan:-</p> <p>This was due to the identification of Loch Sunart as deserving particular distinction with respect to the quality and sensitivity of the marine environment and the importance for marine nature conservation. This was in part due to the wide range of habitats and species which the loch contains, reflecting the transition from the wave-exposed outer loch to the extreme shelter of the inner loch and the complex hydrographic regime within Loch Sunart.</p>	Paragraph 68 text amended to replace "1986" with "1990" and to add "and species" after "habitats" and "and the complex hydrographic regime within Loch Sunart" after "inner loch".
Nature Conservation	69	Scottish Natural Heritage	The Biodiversity Action Plan species tall sea pen <i>Funiculina quadrangularis</i> and horse mussel <i>Modiolus modiolus</i> (forms biogenic reefs in Sunart) are present.	Text amended to include reference to these additional species. After the second sentence in paragraph 69, insert: "The National Biodiversity Action Plan species, tall sea pen (<i>Funiculina quadrangularis</i>) and horse mussel (<i>Modiolus modiolus</i>) are also present."
Nature Conservation	72	Marine Harvest (Scotland) Ltd	It is important to recognise that salmonid decline was in evidence before salmon farming began in the 1970s. There are many reasons why salmonid decline may occur and it would be more appropriate to mention this, as in 79. rather than single out fish farming as being the link.	Paragraph 79 clearly states that the wild salmonid stocks were in decline for a long time prior to the development of salmon farming. However the Scottish Executive link the decline in wild salmonids with fish farming otherwise there would be no need for a moratorium on the expansion of fish farms on the North and East Coasts. Amend second last sentence in paragraph 72 by inserting after "West Coast" the following: "though a range of factors may be involved ". Some of these factors are elaborated on in paragraph 79/80.

Issue	Paragraph	Organisation	Comment	Response
Recreation		Scottish Natural Heritage	We feel that there is an opportunity which has not been taken in the plan to link recreation and the landscape sections of the plan. In particular, issues such as 'sense of remoteness' and wildness should be raised and reference made to NPPG 14 Natural Heritage and SNH policy 02/03 on Wildness in Scotland's Countryside.	The main purpose of the plan is to guide the location of aquaculture Development. Although there are links between the recreational interests of the loch and its landscape interest, other factors are relevant also, e.g. road access and game fishing. Paragraph 74 amended to add "The sense of remoteness and sometimes wildness of parts of the area, particularly around the mouth of the loch on the north side and on the Ardnamurchan peninsula, is an integral part of their attraction for recreational interests such as walking, sailing and wildlife watching."
Recreation	74	Laga Bay Resident	I am not in a position to say to what extent places like these set in scenery of international renown contribute to visitor numbers and the number of jobs in tourism and related service industries. Nor am I able measure these against the benefits of the aquaculture industry which can be so important to communities where jobs and business opportunities can be hard to find. I do however urge that a mistake so often made in the past in this country and in many others is not repeated - that of failing to find a balance between a rich heritage and natural resources and the needs of industry, where the former are damaged, often irretrievably, in the interests of the latter.	Additional reference to the recreational use of the area has been added to paragraph 74. The purpose of the framework plan is to guide developers as to the information that they would need to submit as part of their application and how an application is likely to be viewed in a given area of the loch. It does not, however remove the need for each individual application to be considered on a case by case basis in the same manner as a terrestrial planning application.
Game Fisheries		Association of Salmon Fisheries Boards	Whilst we welcome moves to keep salmon aquaculture away from the mouths of important wild salmonid systems, it is clear that the behaviour of migratory salmonids particularly sea-trout which spend their whole marine lives in coastal waters, makes these fish susceptible to poor disease and parasite management at some distance from the salmon cages themselves. It is therefore essential to view disease and parasite management on at least a whole sea-loch basis (and possibly beyond) and ensure that the highest standards of management are in place, not only to ensure a workable aquaculture environment, but to ensure that disease prevalence is kept at levels which have no impact on wild fisheries.	Noted. - The Council supports the efforts being made by the Tripartite Working Group to safeguard wild salmonid stocks by a holistic approach to management as exemplified by the principles set out in Paragraph 81 and 82.

Issue	Paragraph Organisation	Comment	Response
Game Fisheries	Association of Salmon Fisheries Boards	The industry's record on containment is far from satisfactory with large and repeated escapes of farmed fish. We understand that in Ireland escapes are relatively few and the reason for this better containment record is that sites are more exposed and subsequently are designed to higher specification. Also we understand that Government investment in aquaculture is higher allowing for higher capital investment. This indicates that the Scottish escape problem is more a function of under-specification or poor management practice than any unmanageable risks associated with operating in the marine environment or lack of appropriate technology. Again, given that the escapee problem has no real locational relationship, i.e. escaped fish will range freely up and down the West Coast, we feel that Local Authorities when issuing planning consents could have a very positive role to play in ensuring that industry standards are of the highest order and are maintained that way.	Noted. The Council seeks to ensure that escapes prevention and management plans are included within EIA's. However, other than loss of stock (which may be insured) there are no penalties for the farming companies on losing fish. At present, the management processes set out in the EIA's are not necessarily being put into practice because the operating procedures are not tied into the conditions of development consent.

Issue	Paragraph	Organisation	Comment	Response
Game Fisheries		Association of Salmon Fisheries Boards	<p>Area Management Agreements have proved, in many cases, to be useful vehicles for the resolution of conflict between wild and farmed fish managers and have allowed essential information to pass between these groups under conditions of confidentiality. They also have enabled longer term strategic decisions to be made to minimise impacts on wild salmon stocks. However, they themselves do not offer a solution or an alternative to good regulation at the point of issuing consents - rather they should complement regulation not remove the need for it. We have seen, in recent months, problems associated with attaching, as a condition for issuing a lease, the requirement of an AMA. We would argue that this is neither how AMAs were intended nor does this actually achieve the desired outcome. We believe that Local Authorities should exercise their new powers to control aquaculture development in such a way that it enhances the process of AMAs. It is potentially just as likely that an AMA may be in place with less than desirable management regimes, as it is for there not to be an AMA in an area where all industry CoP's are being adhered. We would therefore argue that it is not the AMA (presence or absence) that is important, but the actual conditions of management and the ability for both the local authority or SEPA to control or influence this management. We would therefore urge Local Authorities to encourage and participate in AMAs but to ensure that planning decisions are made in such a way as to positively influence sound management practice.</p>	<p>Noted - the case referred to does not relate specifically to the Sunart Aquaculture Framework Plan area but these observations do little to support the value of an AMA. The Council takes the view that the Area Management Group should include other stakeholders and that agreements should be within the public domain. The Association of Salmon Fisheries Boards in its response to the Scottish Executive consultation on the extension of planning controls to marine fish and shellfish farming, suggested that "AMA's should be given statutory force by being included in the planning process"</p>
Game Fisheries		Association of Salmon Fisheries Boards	<p>The numbers [of fish] involved in salmon aquaculture are now so large that they dwarf those of wild populations. A single block of salmon cages will contain several times more fish than the entire run of wild salmon on the North West Coast of Scotland. Therefore even very low numbers of, for example, sea-lice per fish which may present no threat to the industry may still result in a vastly increased loading of sea-lice in the wider environment. It is therefore essential that these issues are considered when issuing consents and any conditions attached with them. In recent years, through the work of the TWG, considerable progress has been made with lice control in Year 1 of production, strategically using SLICE treatments early in the year. However, by year 2 lice levels have started to build again and this is now widely acknowledged to be causing serious problems for wild salmonids in alternate years. The TWG is in the process of looking at ways in which this Year 2 problem can be tackled, both through more accurate sampling techniques to ensure early detection of lice count rises and through an assessment of the best theoretical and practical size for SYC management areas. We would encourage the Council to keep these issues under constant review as our knowledge of this subject improves.</p>	<p>Comments noted. Additional sentences added to the end of paragraph 79: "Strategic treatments of in-feed sea lice medicines can however greatly reduce sea lice numbers on farmed fish be during year one of production. Co-ordinated treatments between all the sites within a management area and synchronised following may also help to reduce the overall quantities of medicines used."</p>

Issue	Paragraph	Organisation	Comment	Response
Game Fisheries	72	Lochaber & District Fisheries Trust	The most recent survey data indicates that salmon stocks in the River Carnoch remain depleted. LDFT suggests the use of the word 'threatened' rather than "close to extinction" Mention should also be made of the Strontian River where a brief survey conducted in 2001 indicated that juvenile salmon stocks were at a critical level – quite probably close to extinction. LDFT hopes to conduct more detailed surveys of these and other Sunart rivers during 2003.	In the second sentence in paragraph 72, after "reported to be ", delete "close to extinction" and substitute "under threat". After the sentence which ends "the River Carnoch" insert a new sentence: "Survey information from the Strontian River in 2001 also indicated that it's juvenile salmon stocks were at a critical level".
Game Fisheries	78	Lochaber & District Fisheries Trust	LDFT welcomes the recognition of game fishing as a potentially valuable sustainable resource.	Support noted
Game Fisheries	78	Ardnamurchan Estate	The salmon netting station at Fascadale (Fascadale Ltd.) owns, and exercises, netting rights along the North shores of Loch Sunart from Ardnamurchan Point to Rubha Aird Druimnich (NM596 606). Anyone seeking aquaculture or other developments in this area will need to consult with and seek the approval of the netting station in order to ensure that the proposed developments will not adversely affect existing or potential net sites. It is my understanding that these pre-existing rights in Title extend to either 3 miles from the MHWS, or to half way across the Loch if similar rights have been granted by the Crown to another party on the south shore, or to the MHWS on the south shore whichever is the nearer.	The Lochaber and District Salmon Fisheries Board and the Lochaber Fisheries Trust are routinely consulted on proposals for aquaculture developments in Lochaber. We would expect that they would highlight the presence of netting stations in their consultation responses as happens elsewhere in Highland. Final sentence of paragraph 78 amended to read: "In the surrounding sea commercial and subsistence netting were once of great economic value to Ardnamurchan and Morvern. Netting rights are still owned and exercised from Ardnamurchan Point to Rubha Aird Druimnich on the north side of Loch Sunart by Fascadale (Ltd)."

Issue	Paragraph	Organisation	Comment	Response
Game Fisheries		Association of Salmon Fisheries Boards	<p>Single year class (SYC) management of marine finfish aquaculture species is now widely recognised as being an important way to manage fish health. SYC management allows for synchronised fallowing breaks in the production cycle which provide a management break in disease cycles rather than the sole reliance on treatments. This has the multiple benefit of:</p> <ol style="list-style-type: none"> 1) Reducing the cost of treatments to the operator through reduced need to treat. 2) Reducing the environmental impact 3) Reducing Making disease management more efficient 4) Reducing As a consequence of the above, making the industry more acceptable to other stakeholders. <p>Loch Sunart is currently managed as a SYC management area and all the production is currently under the control of one company. However, in other areas considerable difficulties have been experienced with multiple operators managing different year classes. This has prohibited SYC management and the integrated pest management strategies associated with it. Currently there are few if any conditions associated with leases or consents that would require an operator to comply with SYC management regimes. Indeed in some areas we have seen SYC management achieved, only to break down as different management pressures place different demands on companies operating in these management areas. This is an area in which the Local Authority and SEPA can play a role by ensuring that leases and consents are subject to conditions of good management that comply with industry codes of practice. The current uncertainties facing the industry and the ownership by multi-national companies who can and do transfer ownership on a regular basis leaves these well founded management principles exposed. It is therefore imperative that Local Authorities underpin what may be high quality existing management practice with its own conditions of lease. These conditions must be attached across all the operators in any given area to encourage a strategic sea-loch by sea-loch approach to problem solving.</p>	<p>The Council notes that single year class management currently operates in Loch Sunart for salmon but is not clear how this fits in with the three year growth cycle for halibut at the two sites within the plan area. Marine Harvest has, however recently announced that it is going to cease halibut production at Scottish sites but differing growth cycles would require further consideration in the event that halibut farming commences again in the future. The Council would encourage the use of the sites previously used to farm halibut for the continued culture of this species either by Marine Harvest or by another interested company. When consulted on sea bed lease applications the Council sometimes makes recommendations to the Crown Estate with regard to management conditions within the leases (e.g. the desirability of synchronised stocking) when this seems appropriate. Such recommendations could form the basis of conditions of planning consent at such time as planning control passes to local authorities.</p>
Game Fisheries	79	Marine Harvest (Scotland) Ltd	<p>In section ii) where does this information come from and how does this impact on wild salmonids? In section iii) the facts again would be helpful</p>	<p>Bullet point ii) benthic marine life is altered within the allowable zone of effect beneath cages this is clearly damage beyond that which is already there. Admittedly how this impacts on wild salmonids is not clear. Bullet point iii) The Scottish Executive, in 'A Strategic Framework for Scottish Aquaculture' state at section 3.65 "...escapes from salmon farms constitute a major threat to wild populations." Paragraphs 79 and 80 combined removing the bullet points referred to. See comment below for amendment.</p>

Issue	Paragraph	Organisation	Comment	Response
Game Fisheries	80	Lochaber & District Fisheries Trust	This paragraph is highly speculative. There is no data to suggest that "loss of breeding redds due to poor river management" is an issue around Loch Sunart, particularly not in the Strontian River which is generally in very good condition and runs for many km through nature reserve. Sadly, breeding habitat exists in this river but there are no adult salmon to utilise it. Likewise, salmon stocks declined in the Carnoch prior to the installation of the small scale hydro scheme and no such schemes operate on the Strontian. Indeed, given that 'other factors' are clearly recognised as being of concern under paragraph 79, paragraph 80 is redundant as well as unsupported by good evidence. Sea temperature changes do play a role in marine survival of salmon and have probably played a part in recent declines.	The catchments of the Barr River and in Glencripesdale Burn where heavily afforested in the era before the present generation of forest and water guidelines was produced. Loss of breeding redds as a result of poor forest ploughing practices and subsequent sediment run-off has also been an issue elsewhere in other parts of Highland and may have had a degree of effect here. Amend text by combining Paragraphs 79 and 80, in paragraph 79 sentence beginning "Whilst it is widely..." replaced with "Factors contributing to this decline are varied but may include increased numbers of predators such as seals, increasing sea temperatures and previous overfishing as well as habitat loss. Salmon Aquaculture is however recognised as posing some significant risks. These may include the transfer of sea lice from farmed stock to wild stock and genetic dilution of wild fish stocks as a result of crosses with farmed escapees."
Game Fisheries	81	Lochaber & District Fisheries Trust	LDFT welcomes the recognition of the work of TWG and the promotion of AMAs.	Support noted
Game Fisheries	82	Lochaber & District Fisheries Trust	Salmon farm sites in Loch Linnhe (including Leven, Lorne and Kingairloch) operate on a different cycle to those in the Sound of Mull. LDFT believes that Sound of Mull should be operated in synchrony with Sunart, as the two areas are hydrographically linked. We suggest that an additional sentence be inserted at the end of paragraph 82 as follows: "If more than one management area is to be recognised within the Linnhe, Sound of Mull and Sunart area, disease fire breaks between sub-sections should be maintained and/or established".	Text added to the end of paragraph 82 reading: "However, in order for Sunart to be considered as a separate sub-section of the management area disease fire-breaks need to be established or maintained. The approval of sites at MacLean's Nose and at Bloody Bay (Isle of Mull) together with the reactivation of the site at Fiunary within the Sound of Mull, serve to reduce the effectiveness of a stand alone Loch Sunart AMA by reinforcing its linkages with sites in Loch Linnhe, Loch Eil and the Firth of Lorne."
Archaeology		Laga Bay Resident	Less commonly mentioned is the fact that Sunart also has some of the best examples of Scottish vernacular architecture in the North West, an area which unfortunately has not always had or been able to retain such advantages. Settlements like Salen, Laga, Glenborrodale, Glenmore and Kilchoan contain a rich variety, in terms of scale, style and age, of domestic and farmstead architecture. These, I think it would be generally agreed, are also a precious inheritance.	Text of paragraph has been amended to increase reference to the onshore effects of fish farm developments. The Scottish Executive Guidance encourages local authorities to take into account built heritage and the landscape setting of archaeological features of interest when making recommendations on sea bed lease applications, and this guidance is referred to in paragraph 6. It is perhaps worth noting that the shorebase at the Sunart Sea Farm (Achleek) is contained within an existing stone building which has been converted for this purpose.
Archaeology	83	Historic Scotland	We feel that the archaeological dimension has been well covered, and are content that first contact on archaeological matters should be with the Council's own Archaeology Service	Support noted

Issue	Paragraph	Organisation	Comment	Response
Archaeology	87	Historic Scotland	The only additional point that might be worth making in the Plan is that the Archaeology Service will, in some cases (Scheduled Ancient Monuments and Designated Shipwrecks) need to refer potential applicants onward to Historic Scotland for definitive advice, and that in these cases formal consent may be required under the relevant legislation, entirely separately from any planning or other consents. But this refers only to a small minority of cases, as most known archaeological sites are not thus protected.	In para 87, after the sentence beginning "Developers should...", insert new sentence "They should bear in mind that in some cases (Scheduled Ancient Monuments and Designated Shipwrecks) definitive advice may need to be obtained from Historic Scotland and formal consent may be required under the relevant legislation which is separate from planning or other constraints.
Overall Strategy and Area Policies	88	West Highland Anchorages & Mooring Association	We are happy to find the view that there is little opportunity for further expansion of aquaculture developments, particularly as it is to be an SAC.	Noted.
Overall Strategy and Area Policies	88	Lochaber & District Fisheries Trust	There must be a presumption against the development of fin fish sites in areas which would create hydrographic links between Sunart and the Sound of Mull unless the two areas operate under strict principles of single bay management including fully synchronised fallowing and production. It is likely that this would include a presumption against developments in areas B, C, M and parts of L.	Accepted, however the hydrographic link between sites within the Sound of Mull and Loch Sunart has already been established through the approval of the Bloody Bay (Argyll and Bute) and MacLean's Nose applications. With regard to the position of firebreaks and linkages between management areas the Council must rely on the advice provided by FRS through SEERAD. Text of policy zones B, M and L amended to include the statement: "Any future proposals for finfish farm development in this zone will need to be carefully considered and the proximity of other fish farm sites in the Sound of Mull should be taken into account. Presumption against additional finfish developments in this area unless Loch Sunart and Sound of Mull are operated with single-year-class stocking and synchronised fallowing."
Overall Strategy and Area Policies	88	Scottish Natural Heritage	Whilst we would agree with the bulleted points made for the overall strategy for the framework plan, we feel that there should be specific mention made of safeguarding the cSAC features. The main focus of this plan is likely to be the potential impacts on reefs and otters, but there should be acknowledgement that terrestrial features can also be impacted through shore based facilities.	Support noted and text amended to include reference to safeguarding the features of the cSAC. At the end of the bullet list add a bullet: "Seeks to ensure that aquaculture development is compatible with safeguard of the designated features of nature conservation interest in the Sunart cSAC."
Overall Strategy and Area Policies	88	Marine Harvest (Scotland) Ltd	"Plan seeks to contain finfish production at current levels" MHS acknowledges that any significant increase in the number of finfish farm sites located within Loch Sunart would be inappropriate because of the potential for landscape impacts. However the Scottish Executive Locational Guidelines, SEPA monitoring data and our own internal monitoring, suggest that production could be sustainably increased in the future.	The text of the draft plan did not mention production specifically at paragraph 88. Text of bullet point 4 amended to read "seeks to maintain the scale of finfish development broadly at its current level in terms of equipment, although where environmental considerations permit there may be the potential for modest increases in biomass."

Issue	Paragraph	Organisation	Comment	Response
Overall Strategy and Area Policies	88	Lochaber & District Fisheries Trust	A further bullet point is suggested reading: "encourages best practice with regard to fish health, disease control and parasite management."	Add the text suggested ("with regard to...parasite management) at the end of the third-last bullet, deleting the semi-colon after "environmental practice" and substituting "and".
Zone B		Scottish Natural Heritage	The statement in the third paragraph which states that 'development should be "limited" in scale' is somewhat ambiguous. It is recommended that this clarifies that development should be only small scale. We would also recommend that the policy refers to the need for any new development to be located away from key landmarks such as Rubha Ruadh and Maclean's Nose. It will also be important for developments to avoid seeming to impinge upon the sense of wildness in some parts of this area.	The finfish farm application which was approved in amended form in 2003 for the site at Rubha Ruadh was scaled down at SNH's request but the amended scheme could not be considered "small" in scale in terms of the size definitions used in this plan. Further reduction would probably have made the site non-viable given its exposed nature, and the local community indicated significant support for the application in principle at that time on the understanding that it would generate employment in the Kilchoan area. Furthermore, SNH did not object in principle. The Council recognises the sensitivity of this area in landscape terms but sees development near Rubha Ruadh, where the shoreline is steep and unlikely to be accessed by walkers, as preferable to development nearer to Mingary (which is accessed by walkers), or to MacLean's Nose which is an important landmark and landscape feature in its own right. At the end of the last sentence ("careful consideration ...at this location.") add "and the importance of Maclean's Nose as a landscape feature."
Zone C		Scottish Natural Heritage	There are important nature conservation interests in this section of the loch which would be likely to constrain further aquaculture development.	Accepted. In the area policy, after "outstanding views" insert a comma and "its nature conservation interests."
Zone D		Scottish Natural Heritage	We would suggest that the first sentence requires further clarification. Is the policy a presumption against any new development and a presumption in favour of only amendments to existing leases? Existing developments within this policy area result in significant adverse cumulative landscape and visual impacts and it is recommended that the number of existing sites is reduced if the opportunity arises, as too should the design of those remaining be improved if possible.	The policy should be clear enough as it stands. Finfish or shellfish aquaculture which is broadly compatible with other interests is acceptable in principle. Expansion beyond the current level of gear (more important than the number of leases because of its cumulative visual impact) is not. An overall reduction in the scale of equipment permitted is preferred. This is because the permitted level of gear in parts of this area, (i.e. permitted under Crown Estate lease conditions) is significantly in excess of what is on site at present.
Zone E		Scottish Natural Heritage	In the first paragraph, we would recommend that a statement to the effect that 'shellfish developments are 'tucked' in close to the shore and incorporate only short lines to minimise landscape and visual impacts, provided this does not compromise reef habitats' is inserted. We would also recommend that there is in the second paragraph a presumption against development in areas where this would compromise the sense of wildness and that development should be of only small scale.	Accepted. Add to the first paragraph of the policy text, after "Camasinas", "or compromise reef habitats. Shellfish farms should be tucked in close to the shore and incorporate only short lines to minimise landscape and visual impacts." Also in the first paragraph of the policy text, between "installations" and "do not encroach", insert : "are small scale and". "Areas where development would compromise the sense of wildness" requires further definition in this context.

Issue	Paragraph Organisation	Comment	Response
Zone G	Scottish Natural Heritage	In addition to the provisions in the second paragraph for avoiding close up views of new facilities, it will also be important that developments do not seem to impinge upon the central waters of the loch from key views.	Accepted: Add, "and that any sites do not impinge on the central waters of the loch from key views." at the end of the area policy text for this section.
Zone H	Scottish Natural Heritage	<p>Within the Opportunities/Constraints, we would recommend that reference is made to the biogenic reef habitat in the Laudale narrows.</p> <p>We would also recommend that where the opportunity arises that the existing adverse landscape and visual impacts of the Liddesdale cages should be reduced, for example by reducing the size of the development and/or by alternative layout and siting.</p>	Last sentence of the Characteristics / Constraints section changed to read ".Laudale narrows, including dense and extensive biogenic reef habitat containing the flame shell <i>Limaria hians</i> ."
Zone I	Scottish Natural Heritage	We would suggest that it is important for any new development to avoid seeming to compromise the landmark qualities of the promontories and islands. It is recommended that only small scale development could be accommodated in this location and that any development is located close to the shore to appear in the shadow of the neighbouring hills from key views.	In the first sentence of the area policy delete "northeast" and substitute with "southeast". Delete the sentence which "It is important..." and substitute with "It is important that any new development should not compromise the landmark qualities of the promontories and islands in this section of the loch and on the opposite side. Development should be located close to the shore to appear in the shadow of the neighbouring hills from key views"
Zone J	Scottish Natural Heritage	We would recommend that developments should be of small scale only, located close to the shore. It will also be important that their location and associated activity does not compromise the sense of remoteness.	Recommendation noted, text amended to incorporate landscape advice. In the second last sentence of the policy text, after "installations" insert: "and any further developments should be small in scale and avoid compromising the sense of remoteness."
Zone K	Scottish Natural Heritage	It is important that the area policy reflects the need for any development to avoid compromising the remoteness characteristics of this site, as mentioned in the characteristics/constraints column.	At the end of the first sentence of the area policy ("Support for Marine finfish farming...") add new sentence : "Operations should however be sympathetic to the tranquillity and wildlife interest of this remote area, particularly in relation to noise and boat movements."
Zone L	Scottish Natural Heritage	<p>The landscape value of this area, as described, does not seem to be reflected within the Area Policy for this area. It will also be important that further development does not occur near to the islands as this would compromise their distinctive landscape qualities.</p> <p>We would also recommend that reference is made to the biogenic file shell reefs which occur to the north of Carna.</p>	Disagree. The policy presumes against expansion of marine finfish farming beyond its existing level and only accepts shellfish farm development as an alternative to the existing finfish leases. Area-specific constraints also apply. At the end of the characteristics/ constraints text for this policy zone add: "There are biogenic flame shell reefs to the north of Carna"

Issue	Paragraph	Organisation	Comment	Response
Zone M		Scottish Natural Heritage	We would suggest that further clarification of this policy is required. If the location is not able to accommodate further development, it is unclear how an exception is possible.	Reword first paragraph of the area policy as follows: "The exposed nature of this coastline is likely to discourage aquaculture and the western part merits protection on amenity grounds. The eastern part may however have some scope for development with robust gear as an alternative to development on the seaward side of Maclean's Nose"
Appendix 3 - Slipways and Jetties		Ardnamurchan Estate	"Slipways and Jetties Within the Plan Area" has missed out the Private Concrete Slipway/jetty at Glenborrodale (NM 607 607) and the Private Slipway at Glenborrodale (NM 608 609)	Noted, Appendix 3 table amended to include additional slipway and jetty as suggested.
Appendix 4 - UKBAP Habitats and Species		Scottish Natural Heritage	The list of UK Biodiversity Action Plan habitats and species would seem to be incomplete as the Sunart area supports:- Coastal saltmarsh <i>Modiolus modiolus</i> beds Tidal rapids Other marine rock habitats covered by the 'reef' designation are BAP habitats Upland oak woodland Upland ash woodland tall sea pen <i>Funiculina quadrangularis</i>	Noted appendix text amended to include the species detailed by SNH.
Policy Map		West Highland Anchorages & Mooring Association	Can I ask that an anchor symbol be added at the east end of Loch Na Droma Buidhe as that is also a common anchorage.	Policy map amended to include additional anchorage.
Policy Map		Other Amendments		Label rivers on policy map, add location of approved lease at Maclean's Nose, add flame shell reef north of Carna.
Policy Map		Ardnamurchan Estate	On the "Policy Map" at the end of the plan a number of "Other Roads" have been marked which are either no longer useable or have never existed. There is no road (and there has never been one) immediately North of Ben Hiant from East of Kilchoan to North by North West of Ardslnish - this should be marked as a footpath. The "Other Roads" marked on the map starting just North of Glenborrodale are no longer useable by anything other than ATVs and should also be marked as footpaths so as to avoid potential confusion.	Accepted. Policy Map amended to downgrade the tracks marked as other roads to footpaths as suggested.