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15/01814/MFF Modification to existing fish farm site, including increase and alterations to moorings extent, addition of 2 x 80 metre circumference cages and siting of feed barge at Airds Bay (Etive 4) Loch Etive

FoLE objects to this application and the proposed modifications and expansion at Etive 4.

Screening and scoping

This application has already been subject to a screening and scoping exercise to ascertain whether an environmental impact assessment (EIA) and Environmental Statement should be required for the applicant, pursuant to the European Directive on EIA.

This process was not advertised to the public, but FoLE made representations that an EIA should be undertaken, for many of the reasons detailed below. Those earlier objections letter should be considered as part of this objection.

Regrettably, the screening and scoping opinion issued by the Council on 1st May 2015 concluded that no new Environmental Statement would be required.

The Council nevertheless concluded that “the main environmental issues to consider for this proposal are its effect on landscape character; potential increased risk to wild salmonids; benthic impact; nutrient enhancement and potential interaction with otters as a protected feature of the Loch Etive Woods SAC”.

Requested information absent from the application

Despite the decision that no EIA was required, many of statutory consultees to the screening and scoping exercise indicated that further information need to be supplied in this application, much of which does not appear in the application. As the Council noted “consultees have, however, identified a number of matters that they would wish to see addressed by way of supporting information to accompany a planning application and these are set out in the template”.

Marine Scotland Science suggested that all relevant modelling for the 12 cage 1,545 tonne site should be submitted with the application and that both SEPA and SNH should be asked to confirm whether a visual seabed survey is required for the proposed increase in cages and biomass. None of this appears in the application documents.

The Council asked that a full nutrient enhancement calculation be submitted at the time of the final planning application, but this is not with the application documents online. The Council also asked for a full predator control plan with supporting information with the final application. This is not in the application documents.

Marine Scotland Science noted that “the applicants have provided no information on the protocols in place describing biosecurity nor how they manage lice build-up, nor do they indicate the success achieved in this regard. This information should be provided with any future planning application”. This is not provided.

The Council asked that “the applicant should demonstrate that all reasonable steps to prevent escapes of stock will be taken and details of equipment specifications for moorings and cages and relevant management practices should be provided”. This is not yet provided.

The District Salmon Fishery Board asked that the outcome of discussions Dawnfresh was to have with Marine Scotland, as to whether the predictive models used to estimate the environmental sensitivity of sea lochs are appropriate to Loch Etive, should be included. There is nothing in the application to suggest these discussions have even occurred.



The Council required that “the applicant should provide details on any expected changes to noise levels from compressors and generators and level of activity on sites resulting from the proposed modification, in particular the change from using a feed raft to a feed barge”. Again, this does not appear to have been supplied.

Marine Scotland Science asked that “details should be submitted which are relevant to showing the risks to effective sea lice management at this site and in this FMA (Farm Management Area) are not increased by the additional biomass and cages proposed on site”. This information is not in the application.

The application as it stands is therefore far from complete and the Council should not have validated the application as it stands.

The Council should not determine this application until all the requested and required information has been provided and published on the Argyll and Bute Council planning website, the application re-advertised and made subject to renewed public consultation.

The Loch Etive ICZM Plan

Patently, the Loch Etive Integrated Coastal Zone Management (ICZM) Plan is of great significance to this application.

The ICZM Plan strongly suggests the proposed expansion at Etive 4 should be refused.

It is interesting to note that the application makes no reference to the ICZM Plan.

This not surprising as the proposed development sits within Policy Zone D of the ICZM plan where there exists “a presumption against new agriculture developments in addition to existing sites due to the number of existing sites which largely occupy the most appropriate locations for development resulting in limited capacity for the landscape to accommodate new development”.

As the Council acknowledged in its screening and scoping opinion, “the conclusion of the landscape study and the Loch Etive ICZM plan (at time of writing) was that within Policy Zone D there was an appropriate balance between developed and undeveloped areas, and that the introduction of aquaculture development in hitherto undeveloped locations could upset this balance to the detriment of landscape character. For that reason, a presumption against new aquaculture sites was established, in recognition that there still remains potential to expand the productive capacity of the loch via the rationalisation or consolidation of both shellfish and finfish existing sites”.

Of course, the consenting in 2013 of the massive Etive 6 farm (10 cages plus feed barge) at Sailean Ruadh, in replacement for two very unobtrusive mussel long-lines, has more than ‘used up’ any capacity for consolidation and rationalisation within Policy Zone D, hence the need under the section 75 agreement, attached to the Etive 6 permission, to remove Etive 5 in 2017.

This application is for a straightforward expansion – two more cages, a permanently moored feed-barge and an increase in biomass from 966 tonnes to 1545 tonnes. There is absolutely no element of consolidation or rationalisation whatsoever, nor does the applicant suggest there is and, as such, the application does not comply with the ICZM Plan.

Expiry of planning permission at Etive 4

FoLE wrote to the Council on 5th June 2015, pointing out that the consequences of the arguments put forward by the Council and now accepted by Lord Burns in the recent judicial review of the decision by the Council to grant planning permission in 2013 for the new fish-farm at Etive 6 are that the removal of fish-farm equipment at Etive 4 in late 2011 by Dawnfresh now means that the planning permission there has lapsed.

When Etive 4 was fully de-equipped and replaced with all new equipment, this replacement occurred without any further permission being sought from the Council.



Per Lord Burns, that replacement did require planning permission, as the placing of this equipment constituted development under section 26(6) of the 1997 Act.

Therefore there is no extant planning permission at Etive 4.

As a result, FoLE believes that the current application, which is for a modification of Etive 4, should not have been accepted as valid by the Council, as there is no permission for what is on site at Etive 4 at present.

If the operator seeks to continue to use Etive 4 as it is currently, then it should apply retrospectively for planning permission, with a full environmental impact assessment.

Of course, any proposed increase (2 more cages an automated feed barge etc) could sensibly form part of that 'whole farm' application.

In FoLE's view, if the Council nevertheless proceeds to determine and grant this application for modification, the operator will not have sufficient planning permission to operate the proposed modified Etive 4.

Quite apart from the above, there are a number of environmental and other considerations upon which basis FoLE believes that the Council should, in any event, refuse the application:

Etive 4 since planning permission granted in 2008

To consider properly the proposed modifications to Etive 4, it is necessary also to examine the planning permission for the initial Etive 4 fish farm, which was granted by the Argyll and Bute Council on 17th March 2008.

Planning condition 2 attached to that permission requires that "the development hereby approved will be required to act in accordance with all sections of the Environmental Statement dated 9th March 2007, which was submitted with this application. Reason: To ensure the development complies with all relevant current and future legislation and that minimum environmental/visual impact is caused by this development."

Planning condition 3 requires that "the development hereby approved will be fully compliant with the aquaculture industry's Code of Good Practice. Reason: To ensure that the development is managed in accordance with all relevant current and future legislation".

As the Council's Delegated Report then noted "a comprehensive environmental statement was submitted with the application which covered aspects of escapees, sea lice precautions, impact on seabed and impact on landscape and it appears adequate".

Fallowing and benthic impact at Etive 4

In 2008, the Council's Delegated Report noted what the Environmental Statement stated would be the production cycle at Etive 4 – that rainbow trout would be produced at Etive 4 "over a 16 month production cycle with harvesting commencing after 11 months. An eight month fallow period will follow before the site is restocked for the next production cycle" and that "the site will be run in conjunction with KFF's [Kames Fish Farming, now replaced by Dawnfresh Farming Limited] Port Na Mine site located in Loch Etive and at any time only one of the sites would have fish on site."

At the time, the fallowing of the Etive 4 and Port na Mine (Etive 3) fish-farms was not designed only for benthic pollution reasons (which is controlled by SEPA under the CAR licencing procedure), but in the planning context, it was aimed at maintaining a fair balance between fish-farmers and other loch users and stakeholders by time-limiting the disturbance through fish-farm activity on the loch as a whole.

In fact, information published by the Fish Health Inspectorate and SEPA shows that between February 2009 and May 2012, fish have been on site at both farms for approximately 48% of the time, in breach of Etive 4 planning conditions. Further, in complete breach of planning conditions, Etive 4 has never been fallowed for eight months since it was first granted planning permission in 2008.



Despite these breaches having been drawn to both Dawnfresh's and the Council's attention in May 2013, and the matter reported by Planning Officers to the Council's PPSL Committee in December 2013, the Council "resolved to exercise its discretion not to pursue formal enforcement action in seeking compliance with condition 2 in respect of the fallow period and the simultaneous stocking of fish at both Etive 3 and Etive 4. Whilst there has been a breach of condition 2 in that the site is not being operated wholly in accordance with matters specified in the ES, this was regarded as a technical breach rather than one raising planning issues requiring remedy...".

This lack of proper fallowing at Etive 4 is likely to be the cause of the series of less than satisfactory benthic reports, which look at the level of fish-farmed derived waste (uneaten food, faeces etc) causing organic pollution of the sea bed under and spreading out from a fish-farm. Since 2009, there have been four such self-monitoring surveys, with only one in 2011 being satisfactory:

30/09/2014	Borderline
20/11/2012	Not Accepted
29/04/2011	Satisfactory
29/07/2009	Borderline

According to SEPA's Fish Farm Manual¹ a borderline classification "indicate(s) that a site is close to having an unsustainable impact on the environment...in response to such a classification, the responsible person should consider taking further action to ensure continued compliance with standards. Such action may include...an extension to the fallowing period to allow recovery of the seabed".

It is worth noting that this 'borderline' condition has occurred despite earlier modelling supplied to SEPA and the Council suggesting it would not do so. This demonstrates that modelling produced by consultants to fish-farm operators, with the specific aim of obtaining consents or permissions, should not automatically be assumed to be representative of what will actually occur in the lochs.

In the context of this application, the Council should also not assume that the proposed re-alignment of the existing cage and the addition of two more, with the associated increase of biomass of farmed fish of over 1/3rd, will improve the benthic pollution situation. Logic suggests that 1545 tonnes of farmed fish will produce considerably more pollution than 966 tonnes, even if held in 12 and not 10 cages..

Nor should the Council merely delegate responsibility for benthic pollution to SEPA. The Council has duties to further nature conservation, including of the Priority Marine Feature of burrowed mud in deep waters, as found in Loch Etive at the Etive 4 site.

Priority Marine Features are habitats and species which Scottish Natural Heritage consider to be marine nature conservation priorities in Scottish waters. One of the key objectives of the international Convention on Biological Diversity, the UK Biodiversity Action Plan, and the Scottish Biodiversity Strategy (SBS), is to halt the loss of biodiversity, and to reverse previous losses, through action for species and habitats. Habitats and species that are a priority for action towards this aim have been placed on the Scottish Biodiversity List, as required under the Nature Conservation (Scotland) Act 2004, which also places a general biodiversity duty on all Scottish public bodies, such as the Argyll and Bute Council, to oblige them, when exercising functions such as the planning, to "further the conservation of biodiversity".

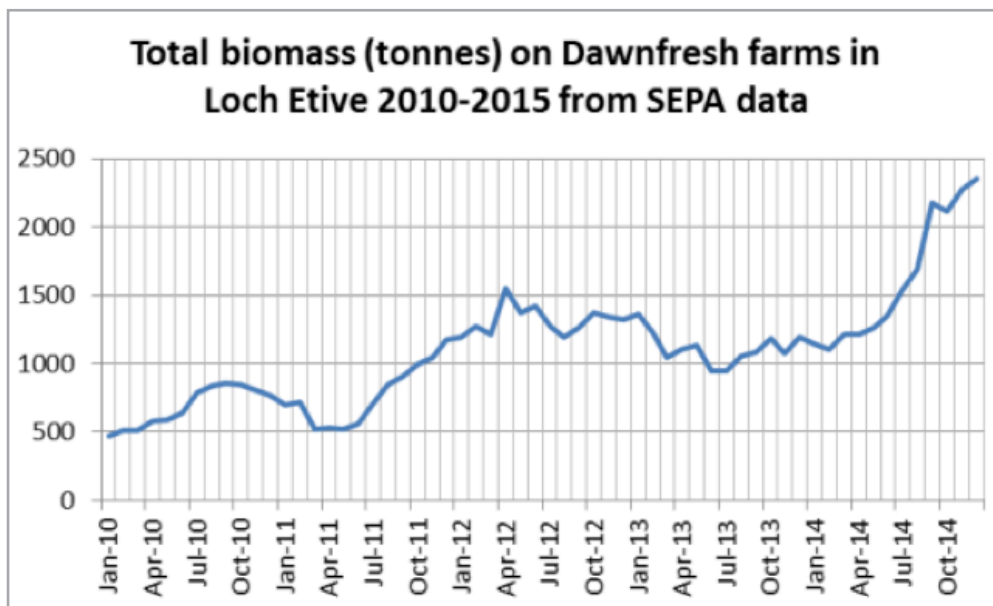
In its response to the screening and scoping exercise, Scottish Natural Heritage confirmed that "this proposal will have an impact upon a priority marine feature habitat and will therefore have an effect on the receptors or issues identified".

¹ <http://www.sepa.org.uk/media/114940/fish-farm-manual-attachment-15.pdf>



The Council required that “any sea bed survey, modelling reports and details of the biomass and chemical usage consented by SEPA should be submitted with any planning application”, but those documents have not been supplied by the applicant.

FoLE believes that the near 500% increase in trout biomass held on Loch Etive (as shown by the graph below, drawn up using SEPA monthly biomass returns) means that the benthic impact on Loch Etive, as a whole, will have increased significantly in the last 5 years and should now not be permitted to increase further still.



Sea-lice and the risk to wild salmonids (salmon and sea-trout) in Loch Etive and surrounding rivers

In 2008, the Environmental Statement for Etive 4 stated that “sea lice is not considered to pose a major problem at this site given the brackish condition of the water in Loch Etive”.

However, this has proved not to be the case. The sea-lice issue on Etive is no longer some hypothetical risk.

Despite the oft-repeated mantra that ‘Etive has no sea lice’, Etive 3, Etive 4, Etive 6 and Ardchattan were all treated for sea-lice by Dawnfresh last autumn using emamectin (Slice). FoLE understands that a further treatment has become necessary again this summer (2015).

In October 2014, at Etive 6, two farmed fish were sampled by the Fish Health Inspectorate and had lice loads of 10 and 12 respectively, recorded as mixed stages, meaning that these were not just juvenile lice and may well have included adult female (egg-bearing) lice. Indeed, for the Etive 4 and Etive 6 farms, the Fish Health Inspectorate’s reports answers in the negative to the standard question “Are sea lice record levels below the suggested criteria for treatment in the CoGP during the period that records are inspected?”.

At the time, there were 274,000 fish in Etive 6 and 229,000 held in Etive 4 – over half a million fish. Even if just a single adult female lice was present on each fish (which is the lowest level that could have been present, given that the CoGP threshold was breached), this constitutes an enormous production of juvenile sea lice and a huge risk to wild salmon and sea-trout in Loch Etive.

Marine Scotland Science has told the Council in its Screening and Scoping exercise that “scientific evidence from Norway and Ireland indicates a detrimental effect of sea lice on sea trout and salmon populations. The magnitude of any such impact in relation to overall mortality levels is not known. However, concerns that there may be a significant impact of aquaculture have been raised due to declines in catches of both salmon and sea trout on the Scottish west coast....



Information from the west coast of Scotland suggests lice from fish farming can cause a risk to local salmon and sea trout”.

As the Council recognises this is a sensitive area, with the Etive 4 farm approximately 2km from the River Awe, 5.5km from the River Noe, 8km from the River Liver and 10km from the River Kinglass. Given the importance of the salmon wild fishery in the River Awe and the fact that salmon and sea trout entering rivers in the upper Loch will have to pass the Etive 4 farm on route to these rivers, the Council must be satisfied that the applicant can control any current or future sea-lice problems.

Of course, most salmon farmers attempt to deal with chronic sea-lice infestation problems by employing loch-wide fallowing, a method supported by Marine Scotland Science and the FHI, in order for the sea lice levels within a loch to drop back to levels that do not cause problems either for farmed fish or for wild fish.

The same method of fallowing is used to control other fish-diseases. It is worth noting that Etive 4 was confirmed as having Bacterial Kidney Disease in its fish in 2009/10, but the current application makes no mention of the risk of this and other farmed fish diseases to Loch Etive’s wild fish.

[Of course, loch-wide fallowing also limits the noise and operational disturbance to other loch users and the loch-side community, reduces water pollution and the overall impact on wildlife of having an operating intensive fish-farm in a sea loch. Cages may also be removed from the water or towed to different sites if the fallow period is long enough and so the visual or landscape impact is reduced by having a significant fallowing period].

However, for the ‘business reasons’ – that were detailed in its Etive 6 application and Environmental Statement, when ruling out considering alternative sites for its new farm outside Loch Etive – unlike salmon farmers, Dawnfresh confines all its seawater production to a single loch, Loch Etive. It is therefore not possible for Dawnfresh to fallow all of Loch Etive at the same time and maintain any production of sea-grown fish.

While Dawnfresh operates continuous production on Loch Etive, this presents a significant risk that sea lice numbers could build up over time in Loch Etive, despite the available chemical treatments, which salmon farmers are increasingly discovering, do not always work to clear sea-lice.

The Argyll District Salmon Fishery Board has commented that “it has been established in the salmon farming industry that it is not sufficient to treat sea lice with drugs and chemicals. It is also necessary to simultaneously fallow the farm sites within a sea loch every two years in order to break the reproductive cycle of the lice. Now that sea lice have established themselves on the trout farms in Loch Etive, we expect these farms to be fallowed according to the proven system. Further expansion of farms in the loch should not be contemplated until a fallowing regime has been agreed”.

The Fish Health Inspectorate too has already highlighted to Dawnfresh the risks this lack of loch-wide fallowing in Loch Etive brings.

The Council has acknowledged its statutory functions in relation to the interaction with wild fish that the sea-lice issue creates – “in terms of the efficacy of sea lice treatment, this is an issue to be considered in any future planning applications. Whilst as a Planning Authority we do not exert any control over biomass, it is clear that wild fish interactions are a material planning consideration”.

FoLE would therefore suggest that to ensure adequate control of sea-lice for the whole operational life of the farm, the Council should now not be consenting to any increase in biomass at Etive 4, but should in fact be enforcing the existing 2008 planning conditions which require that Etive 4 and Port na Mine (Etive 3) are never used at the same time and that Etive 4 should be subject to 11 month post-production fallowing, also to include loch-wide fallowing.



Escapes of farmed-fish at Etive 4

In 2008, when Etive 4 was first considered for planning permission, objections were raised as to the likely problem with escapees, but the Council's Delegated Report at the time commented that the operator "has a contingency plan in place if there is an incident of escapees, however the risk of this occurring is minimal given the predator control plan put in place".

The Council's confidence have proven to be misplaced.

According to the Scottish Government's Scotland's Aquaculture database, since then, Etive 4 has suffered from five officially reported escapes since 2008:

Date of escape	Number of fish
03/04/2015	2091
08/09/2009	523
17/06/2009	523
25/10/2008	0
02/09/2008	1062

This year saw the biggest escape yet from Etive 4, with Dawnfresh confirming that it had lost over 2,000 fish into Loch Etive in April this year. Taking their controversial RSPCA 'Freedom Food' status too literally, 2091 fish, averaging 9.5 lbs each, escaped through 'a hole in the net'. Dawnfresh was only able to ascertain how many fish were lost following the recent harvesting of the remaining fish from the Etive 4 site.

Generally, Dawnfresh's Loch Awe and Loch Etive farms have a very poor record of losing rainbow trout and this has, over many years, caused great disruption to the wild salmon fishing on the River Awe. There have been just under 24,000 reported rainbow trout escapes into Loch Awe and Loch Etive since the start of 2008, the year Dawnfresh bought the farms

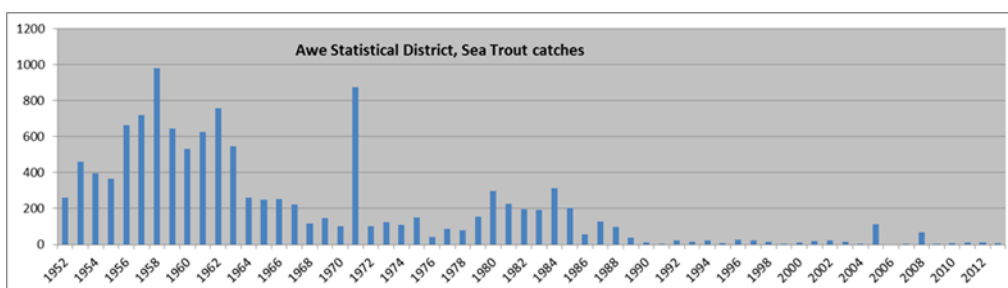
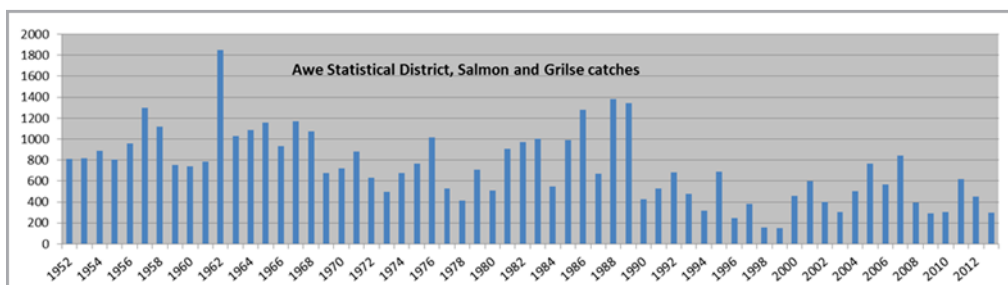
In this application, Dawnfresh states in its 'pre-application' to the Council that the two new cages, nets and moorings will be of the same high specification as the existing site equipment at Airds Bay, those that just lost over 2,000 fish.

In its screening and scoping exercise for the current application, the Council concluded that "new equipment at existing sites has led improvements in containment".

Despite the claims that escapes will be prevented, a more realistic view for the Council to take – based on the facts, including from this year – would be that if the expansion goes ahead, Loch Etive should expect more escapee fish.

Etive 4 is located within a very short distance indeed of a number of burns and rivers known to contain Atlantic salmon and sea trout populations, including the River Awe.

The following graphs show the numbers of fish reported as being caught in the Awe statistical district between the years 1952-2013. They illustrate the severe downward trend in catches over that period, illustrating that these wild populations should not be exposed to any further negative impacts.



Marine Scotland Science has noted in its response to the screening and scoping exercise that rainbow trout (as are farmed by Dawnfresh) when first released (escaped) into the wild can be inefficient feeders and tend to exhibit high mortality rates but this is not always the case and a proportion make the change to wild food successfully, an example being their behaviour when released into stocked fisheries. It should be borne in mind that rainbow trout can pose a threat through direct competition for resources and transfer of disease.

The Council must therefore decide whether the holding of yet more farmed fish is acceptable or whether the balance between wild and farmed fish interests has already been reached and is now too clearly in favour of the fish-farmers.

Impact on landscape – inadequate and erroneous Landscape Visual Appraisal

In its screening and scoping opinion, the Council noted that “the applicant should provide a Landscape and Visual Impact Assessment (LVIA) which should follow SNH guidance on the siting and design of aquaculture development (www.snh.org.uk/pdfs/publications/heritagemanagement/marineaquaculture.pdf)”.

The Council also required that “this assessment should include/consider:

- scaled diagrams and photomontages including cages, top nets, feedbarge and any other ancillary equipment (cage and top net height);
- views from key viewpoints identified by planning authority and SNH;
- updated sequential cumulative assessment (from Etive 6 application) to reflect a journey up the loch on a sea kayak or other craft; and
- any changes to navigational lighting or underwater lighting.

This assessment should also consider the cumulative impact from the proposed expansion at Etive 4 and Etive 6 and the LVIA should include the proposed expansion at Etive 6 in photomontages where from viewpoints where both sites can be seen in the same view”.



Despite this the applicant has supplied woefully inadequate and erroneous documents in support of its application.

As the applicants "Pen Realignment" document states, at 2.1.4, the application "does not attempt to undertake a detailed landscape and visual impact assessment of the proposal as would be found within a formal Landscape and Visual Impact Assessment (LVIA)". This is not the detailed document required by the Council.

At 2.6.2 of this document, it is clear that the appraisal is based on earlier studies not carried out since the construction of the Etive 6 site. Etive 6 is still referred to as being 'consented' rather than being in situ. This suggests the consultants have not actually visited the site since before Etive 6 was built and continue to rely on 2013 predictions of what Etive 6 would look like, not what it actually looks like in 2015.

At 3.1.3, the application refers to the static boat type feed barge, but massively downplays the height and imposing nature of the barge. It is worth noting that neither the Pen Realignment document, nor the Landscape Visual Appraisal carry photographs of the barge that will be permanently moored at the new site.

At 3.3.4, the application comes to the conclusion that the visibility of the existing fish farming developments of Etive 4 and 5 does have an influence on the character of this part of Loch Etive, which will be intensified by the construction of the consented Etive 6 [that farm is in fact already constructed], albeit that this effect is not considered to be of a sufficient magnitude to represent a major or defining element in the character of the landscape.

In FoLE's opinion, fish-farming is already the major defining element in the character of the loch landscape within Policy Zone D.

There is only sparse reference to those people actually using the waters of Loch Etive – eg "people using Loch Etive for sailing will inevitably be aware of the development as they pass by" at paragraph 3.3.8. This completely downplays and ignores the view of fish-farms and imposing tall automated industrial feed-barges that the sailing, kayaking, fishing and diving visitors will experience passing up the loch, past first Etive 5 at Ardchattan then Etive 6 at Sailean Ruadh and Etive 4 in Airds Bay.

Again, at 3.3.9, much is made of the low-lying nature of fish pens and cages, but no reference is made to the height and imposing nature of the permanently moored feed barge which is also part of this application. Nor is there any photograph supplied in the application.

For illustration, attached to this objection are photographs taken by FoLE of what the existing feed barge looks like on the loch at Etive 6.

In conclusion, at 5.1.4, and without foundation, the application concludes that "the additional effect of the development on its own and in combination with the existing operational consented an application stage development at Etive 6 fish farm would amount to a **minor to moderate** perceived increase in fish farming activity in the central part of the loch. This magnitude of cumulative effect would not lead to fish farming becoming a key or defining visual characteristic of the loch".

This is based upon extremely long-range distance and poor quality photographs and montages. Note also that the photographs are dated 2013, prior to the construction of Etive 6.

Nor does the Landscape Visual Appraisal take any note of the Loch Etive ICZM Plan.

Further expansion planned at Etive 6 – two more cages expected

It is worth noting also that the plan shown on page 5 of 14 of the Landscape and Visual Appraisal is entitled "Realignment and extension of Etive 4 **and proposed Etive 6 extension**" and shows Etive 6 with 12 cages and not its currently-consented 10 cages.



This, of course, is a reference to the proposal to add a further two cages to the Etive 6, which has been through the screening and scoping process with the Argyll and Bute Council, but has not appeared as a formal application to date.

Patently, as the Landscape Visual Appraisal illustrates, the realignment and addition of two extra pens at Etive 4 together with a large permanently moored automated feed-barge should be considered a single project along with the proposed additional two cages to be added to the already ten cages and feed barge at Etive 6.

To proceed with granting planning permission for modifications etc. at Etive 4, without considering the cumulative impact of the proposal for a further two cages at Etive 6, would potentially be unlawful as against European law as interpreted by recent judgements of the European Court of Justice.

Additionally, photomontages produced later in the document do not appear to have the extra two cages at the Etive 6 site and therefore cannot be used to judge the cumulative impact of the two proposed expansions at Etive 4 and Etive 6.

Navigation

In relation to navigation, in the screening and scoping exercise, the Council stated that “the applicant is requested to provide an assessment of how the extended footprint of the farm (surface and sea bed mooring area) will affect or interact with navigation, commercial sea fishing, prawn creeling) and recreational interests (sea angling, recreational boating and kayaking)”.

No such information has been provided in the application but the impact of the expansion of Etive 4 when considered cumulatively with the new 10 cage farm at Etive 6 and indeed that farm’s proposed expansion to 12 cages, will be negative upon most other users of Loch Etive.

Noise

The Council’s screening and scoping exercise concluded that “the application should provide details of any expected changes to noise levels from compressors and generators and level of activity on site, resulting from the proposed modification, in particular the change from using a feed raft to a feed barge”. However, no information has been provided in the application.

There is obvious potential for noise nuisance from the proposed expansion at Etive 4.

The Loch Etive ICZM Plan notes that finfish sites have “potential to be a source of noise pollution due to activities associated with the construction and operation of the facility”.

The new Etive 4 is proposed to operate with a feed-barge and feed pipes down which pelted food is ‘blown’ to the cages. It is likely that this automatic feeding system proposed will lead to constant low level intrusive noise. The blowing of feed down feed pipes which at other fish-farms has led to complaints of low level but constant and intrusive noise. Further, the need for diesel generation systems onboard the feed-barge will also result in constant engine noise. As sound travels further over water, this is likely to be a significant issue.

Proper assessment is required as to the impact on nearby locations such as Taynuilt itself and FoLE would suggest an existing feed-barge and pipes set-up in full operation is independently examined in the field, as opposed to relying on purely theoretical desk-based modelling exercises.

Formal objection

For all the reasons stated above, FoLE objects to this application and urges the Council to refuse to grant the planning permission sought.

Indeed, the Council must now recognise that any further expansion of trout farming upon Loch Etive as a whole is unacceptable.