

ARGYLL DISTRICT SALMON FISHERY BOARD

Argyll & Bute Council
Lochgilphead

Cherry Park
Inveraray
Argyll
PA32 8XE

7th August 2013

Dear Sirs,

Marine Fish Farm Application: Sailean Ruadh (Etive 6) Loch Etive
Your ref: 13/01379/MFF

Thank you for providing the Argyll District Salmon Fishery Board the opportunity to comment on this application.

Having reviewed the documents provided, the Argyll District Salmon Fishery Board is of the opinion that this development poses a significant risk to wild salmon and sea trout, and therefore planning permission should not be granted.

We remain extremely concerned about the ability of the applicant to prevent farmed fish from escaping from their farms. We received reports that a number of Rainbow Trout had escaped from the applicant's site on Loch Awe at the end of June. This resulted in a number of Rainbow Trout being caught in the top beat of the River Awe, the Barrage Beat. Fishing for Atlantic salmon on this beat costs anglers up to £100 per day; catching Rainbow trout on this beat threatens the reputation of this fishery as a prime Atlantic salmon fishery with the potential to cause an economic loss. Worryingly, the applicant was unaware of this escape, and it was anglers who reported the escape to the applicant as well as the Argyll DSFB. As we stated in our response to the original application in December 2012, the applicant has a track record of allowing its stock to escape in Loch Etive and Loch Awe, and before granting planning permission for a new site, we suggest the applicant should first demonstrate that they can contain their current stock of fish.

Angling for wild Atlantic salmon in the Awe catchment is an important economic sector for Argyll & Bute, with visiting anglers providing direct income for fishery owners, local hotels, restaurants and other local businesses. The sector also provides indirect income to many other local businesses, such as butchers, fishmongers, laundry services etc. The River Awe fishery is directly responsible for one full time worker, three part time workers, as well as other locals who act as fishing guides.

We also remain concerned about the spread of disease from farmed to wild fish. The applicant mentioned at a recent consultation that disease issues were under control in Loch Etive, and we would wish to see evidence of this.

Chairman – Roger Brook

Clerk – Craig MacIntyre. Tel: 01499 302322 E-mail: cm@argyllfisheriestrust.co.uk
Admin – Helen MacIntyre. Tel: 07915 610086 E-mail: hm@argyllfisheriestrust.co.uk

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When the applicant consulted with the Argyll DSFB and river owners of the Rivers Awe, Orchy and Etive, it was proposed at that stage that should planning permission for a new site be granted, then the site closest to the River Awe would be closed. We note from the Final Planning Statement provided that this is not now the case, and that the applicant intends to operate 6 sites in Loch Etive. The benefits of closing the nearest site to the River Awe will not now be realised, and the addition of a further site represents a significant increase in the risk to wild salmonids.

In the Final Planning Statement, the applicant recognises that there is a presumption against new aquaculture development in the area in the ICZM, mainly due to the number of aquaculture sites already in the loch. However, the applicant states that this new site is a consolidation of an existing site as they are reusing a shellfish farm, and therefore the site should be considered to be as "Brownfield". We suggest that a site visit would demonstrate that attempts to label this idyllic location as "Brownfield" are extremely misplaced. With regard to visual and environmental impacts, there is a vast difference between a shellfish farm (which resemble a series of buoys), and a 10-cage fish farm, with the associated feed barge and multiple daily boat trips from farm staff. We are of the opinion that this development should not be considered as consolidation of an existing site, but as a new fish farm in Loch Etive. Indeed, Permitted Development Rights for aquaculture do not extend to switching between shellfish and finfish aquaculture, which appears to conform to the view that shellfish and finfish are very different types of aquaculture, and therefore this application cannot be considered to be a consolidation.

Having considered the new planning application, we are of the opinion that this is not an appropriate development, and we therefore object to planning permission being granted.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'C.M.R.', with a long horizontal flourish extending to the right.

Craig MacIntyre
Clerk to the Board

Chairman – Roger Brook

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