

LOCH BRACADALE



AQUACULTURE FRAMEWORK PLAN

REPORT OF CONSULTATION

OCTOBER 2002

1.0 BACKGROUND

- 1.1 This report describes the results of the public consultation on the draft Aquaculture Framework Plan for Loch Bracadale. The report and proposed amendments to the draft plan were approved by Highland Council's Skye and Lochalsh Area Committee on 12th August 2002.
- 1.2 Draft policies for the plan were discussed at a public meeting held in Struan in December 2000 and the draft plan was issued for formal public consultation over an eight week period finishing on 22nd March 2002.
- 1.3 Comments received on the draft plan have been appraised and the amendments to the plan are set out below. Detailed tabulations of the comments received along with the responses on behalf of the Council are given in Appendix 1. A full list of the organisations and individuals that were consulted on the draft plan and/or provided a response is given in Appendix 2.

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 70 copies of the plan were distributed for comment. These went to the relevant agencies, fish and shellfish farm operators, landowners, community organisations and interest groups. Copies of the plan were also made available for public inspection at local Post Offices, Council service points and libraries.
- 2.2 Fourteen written responses were received comprising over 110 individual comments in total. A wide range of respondents welcomed the preparation of the plan and supported its objectives and it was generally commended for its clear layout and approach. The main issues raised came from Scottish Natural Heritage and to a lesser extent salmon farming companies, local game fishing interests, and some recreational water users.
- 2.3 SNH's comments were wide ranging but the main thrust was that the draft plan did not give enough consideration to the current level of aquaculture development in the loch and the area policies allowed for too much further expansion. Many of SNH's comments called for a modification of the draft policies accordingly. This included a policy in favour of a reduction in the level of aquaculture development in some areas.
- 2.4 Marine Harvest Scotland and Stolt Seafarms felt the plan was generally well written but complained at the inclusion of anecdotal information from salmon fishing interests and inshore fishermen on the impacts of finfish farming locally. These views, they felt, should be removed from the plan, however other respondents felt that the interaction between wild fish and fish farms was not dealt with strongly enough and there was sufficient scientific and circumstantial evidence to support the Council's position.
- 2.5 One of the main non-fisheries related comments was that the plan needed to take more note of recreational and commercial navigation interests within the loch. A significant concern was the encroachment of sea bed leases into navigational channels and anchorage areas and the lack of appropriate navigational markers and lights.

3.0 MAIN ISSUES AND CHANGES TO THE PLAN

Objectives of the Plan

- 3.1 SNH welcomed the objectives of the plan as set out in Paragraph 8 of the consultative draft. It felt however that the objectives were not fully supported by all the area policies and it specifically highlighted that the area policies allow for further finfish expansion at a number of locations around the loch.
- 3.2 SNH also felt that the inclusion of the objective to “maximise the general economic and recreational value of the loch” should have been given more prominence by the inclusion of further information on the value of the loch in terms of recreation and tourism. This, it felt, would balance the economic information provided in the plan in terms of aquaculture jobs and income. On the other hand, Marine Harvest Scotland and Stolt Sea Farms both commented that there was not enough emphasis on the income to the area from aquaculture including downstream jobs and income to local residents, tradesmen and shops.
- 3.3 *RESPONSE: The Council felt it was unreasonable to expect every individual area policy to deliver all of the plan’s objectives. Furthermore, the area policies which allow for further finfish developments are not contrary to the objectives of the plan. There appeared to be some misinterpretation by SNH of some of the area policies which presume in favour of aquaculture development in areas where installations are already established. These policies are intended to support the principle of continued aquaculture use within a given zone rather than support expansion of existing installations and they are qualified accordingly. In most cases it is not realistic to build policies around existing fish farm leases because leases may expire or be relocated within the lifetime of the plan. A statement has now been inserted into the plan ahead of the area policies section to make this clear. The area policies themselves have also been reviewed in the light of SNH’s and other respondents’ comments.*
- 3.4 *The text of the main document has been amended to include reference, with figures where available, to the tourist income to the Skye area and the number of visitors per annum to local attractions. Additional information on the income and wider benefits from aquaculture to the area has also been included.*

Future Prospects for Aquaculture Development

- 3.5 SNH felt that paragraph 21 in the consultative draft would benefit from further clarification arguing that the statement “further expansions of the main sites are unlikely to be favoured” was not backed up by the area policies. In addition it felt the statement that “the main opportunities are for small discreet installations, or for innovative technical solutions which can overcome the main constraints” was to some extent incorrect because new technology such as automated feed barges would not necessarily overcome constraints in visual impact. It also felt the plan should include further policies for the outer loch area. The use of automated feed barges featured in several other comments from SNH. Although the plan gives some information on the visual impacts of feeding systems the organisation felt that other impacts such as noise pollution should also be considered in the plan.
- 3.6 Several respondents raised the issue of biological carrying capacity and the precautionary approach advocated by the Council. Historically the loch has supported large populations of wild sea fish, probably far in excess of the current farmed biomass in the loch. SNH commented that our policies seemed to relate only to landscape rather than biological carrying capacity.
- 3.7 *RESPONSE: The introduction to the policy section of the plan and the relevant area policies have been amended to clarify, as mentioned above, that a presumption in favour of development in a policy zone already containing an aquaculture installation indicates continued use is acceptable but not necessarily further expansion.*

- 3.8 *The text of the “Future Prospects” sub-section has been amended to provide further information on the issues surrounding automated feeding systems, including the potential environmental benefits as well as problems associated with noise and visual impact. The likelihood of a proposal for an aquaculture development in the middle of the mouth of the loch is remote because of the exposure factor. Additional policies for the mouth of the loch should therefore be unnecessary. The text has been amended to highlight the fact that information on biological carrying capacity is difficult to obtain.*

Nature Conservation

- 3.9 Eight of the nine comments on this section of the plan were made by SNH. In the main it felt the plan should state more explicitly the Biodiversity Action Plan (BAP) species and habitats in the area and the responsibility to ensure their conservation. The policy map and the nature conservation thematic map highlight the presence of maerl and sea pens but SNH suggested that the presence of these species should be carried forward into the area policies.
- 3.10 *RESPONSE: Further information has been added to the main text to highlight the conservation responsibilities with regard to BAP species and an appendix has been added to list these species. The text now also includes the conservation status of otters and the area policies have been reviewed to incorporate reference to the presence of maerl and seapens as appropriate.*

Water Quality

- 3.11 Stolt Sea farms and Marine Harvest Scotland Ltd both took issue with the statement in paragraph 43 of the draft that local fishermen have expressed concern regarding discharges from finfish installations affecting wild fish and shellfish stocks. Both companies objected to the inclusion of anecdotal evidence in the plan. They also felt that paragraph 46 of the consultative draft contradicted the promotion of polyculture in paragraph 26 and expressed an interest in exploring polyculture opportunities in the future.
- 3.12 *RESPONSE: Whilst the Council accepts that there are wider issues associated with the decline in inshore fisheries, fishermen’s concerns about the decline in shellfish stocks close to fish farms should not be dismissed. The text of paragraph 43 has been amended in order to indicate this. Paragraph 46 has also been amended to indicate that the introduction of polyculture may require a review of the published indicative separation distances.*

Recreation and Tourism

- 3.13 The main concerns in relation to this section were the visual impact of aquaculture installations on the amenity value of the area for walking and other recreational activities. SNH suggested that consideration should be given to views of the loch from the hills surrounding the plan area. Navigational access to recognised moorings and anchorages in the loch was also highlighted by a number of respondents and the main concern was the lack of navigational markers on aquaculture installations.
- 3.14 *RESPONSE: The policy map has been amended to include the circular walk from Sumardale to Inver Meadale. The text now indicates that the Northern Lighthouse Board are responsible for determining whether or not navigational lighting is required on each site. However, in view of the concerns expressed during the consultation, the plan now includes as one of its main themes the need to safeguard navigational access and it indicates that lease holders should install and maintain navigational markers.*

Native Fish Stocks and Game Fisheries

- 3.15 Several respondents provided additional information of relevance to this section, but as might be expected the comments represented a polarized view between the fish farm operators and freshwater fisheries interest. Stolt Sea Farms and Marine Harvest Scotland Ltd objected again to the use of anecdotal information in this section and felt that the plan did not take sufficient notice of other factors that may be implicated in the decline of freshwater fisheries other than the presence of finfish farms. Marine Harvest went further by requesting that the sentence referring to anecdotal evidence from local estates should be removed from paragraph 51 and submitted information extracted from Scottish Executive catch statistics which showed salmon and sea trout stocks declining long before fin fish farming commenced in Scotland. By contrast, freshwater fisheries interests felt that the draft plan did not go far enough in identifying the link between fish farming and the decline in wild salmonids.
- 3.16 In common with other framework plans the issue of Area Management Agreements (AMA) was commented on in some detail. Stolt and Marine Harvest both stated their support for the work of the Tripartite Working Group whilst SNH and other respondents asked for an indication of the timescale for completion of an AMA.
- 3.17 *REPOSENSE: The text of this section has been amended to highlight the range of factors which may be involved in the decline of freshwater fisheries. It has also been amended to make clear that at present the Council has no powers to speed the completion of an AMA but would welcome a signed document in the near future.*

Strategy and Area Policies – Policy Zones

- 3.18 A total of thirty comments were received in relation to this section of the plan. Comments on the specifics of the strategy and area policies generally related very closely to the comments made on the document text as outlined above. In addition local area staff suggested the need for the plan to pay closer attention to the implications for local roads of the further expansion of aquaculture. Additional information was provided by some respondents on items which they felt were inaccurately represented in the area policies, for example the location of seal haul-outs or well-used anchorages, or the amenity value of an area. SNH supported the policy proposed for most of the zones but felt that for zones C, G, K, M and O there should be no further expansion or a presumption in favour of small scale shellfish farms only. For Zone J it felt that there should be a policy in favour of reduction in scale of the leases already granted.
- 3.19 *RESPONSE: The text of the “Strategy and Area Policies” section has been amended to incorporate the proposals discussed in section 3.7 above, in particular clarifying that a presumption in favour of development does not necessarily mean that additional aquaculture installations are permitted. The main text, area policies, and policy map have been amended as necessary to incorporate additional information on the policy zones received during the consultation process, a greater emphasis has been given to the issue of sea servicing in order to reduce the pressure on roads, including an additional element in the strategy to this effect. It was not felt necessary to call for a reduction in the level of aquaculture development in any areas. the importance of controlling the scale and location of development off the NE side of Tarner island is stressed in the existing policy for Zone J.*

APPENDIX 1 - DETAILED RESPONSES

The following pages contain a schedule of all written responses to the draft plan arising from the public consultation. It gives the source and content of every representation, the Council's response to each comment and the decision to amend the plan where it was considered appropriate. General comments on the draft plan are listed first. Thereafter the structure of the schedule and the paragraph numbers referred to follow that of the draft plan.

<i>Issue</i>	<i>Paragraph</i>	<i>Organisation</i>	<i>Comments</i>	<i>Response</i>
General		Skye District Salmon Fishery Board	The board is delighted to have the opportunity to comment on the draft plan, and would fully support the comments made by Mr. John Marchington in his letter to Mr Mearns dated 23rd January 2002 [See comments by Mr Marchington under inshore fishing and game fishing sections]	Noted
General		Struan Community Council	We would like to congratulate you on an excellent document.	Support noted
General		Minginish Community Council	<p>This Community Council considered comments from members and the community at their meeting on 12th March. They agreed that the draft was a good descriptive document and therefore a useful starting point on which to base planning decisions, when these become a Highland Council responsibility. However it was recognised that all such decisions would need to be made on a case by case basis and great care would need to be paid to the various caveats in the "Area Policies" sections.</p> <p>For the sections that directly concern this community (Zones A-F) it was felt that this was particularly important should any new finfish farms or extensions to existing farms be proposed. In particular it will be necessary to consult early and fully with the community in any such case.</p>	<p>The role of the Framework Plan is not just to inform the planning decision but also to assist potential developers in identifying suitable sites for aquaculture installations. Decisions on individual applications are made on a case by case basis within the framework of area policies set out in the plan.</p> <p>Public consultation has been undertaken in relation to new aquaculture installations since October 1986 and under the 1999 National Planning Guidance applications for new sites and significant modifications to existing ones are subject to an EIA screening opinion, on which the Council is consulted. Although not formally required to do so at the EIA screening stage the Council consults the relevant Community Council in order to gauge the local view.</p>
General		Crofters Commission	We understand that organisations such as the Scottish Crofting Foundation, Struan Jetty Users Association etc are best placed to present informed and sound comment, from a local perspective, on the Framework Plan.	Noted, Struan Jetty Users Association were consulted on the Draft Plan
General		Mr Neil Campbell	I think that the plan is comprehensive and I am largely in support of its conclusions	Support noted

<i>Issue</i>	<i>Paragraph</i>	<i>Organisation</i>	<i>Comments</i>	<i>Response</i>
General		Struan Community Council	Any future developments should be considered on their individual merits giving due consideration to the environment and prospect of employment.	Agreed, the plan aims to provide a framework within which each application can be considered on its own merits.
General		West Highland Anchorages & Mooring Association	We commend the draft plan which you have produced for Loch Bracadale. In doing so we endorse the criticisms and constructive comments made by Peter Paget from Stein, Skye in his letter of February 2002. [See section on Recreation and Tourism and inshore fishing]. Your Plan has proved timely as you will know that the Scottish Executive is conducting a review of the guidelines for the location of fish farms.	Support noted
General		Crown Estate	The Crown Estate welcomes and supports the Highland Council's initiative to prepare such plans for areas of coastline where a higher than average density of fish farm consents exist or where particular issues surrounding fish farm development within a defined area exist and more detailed guidance is required on prospects for future development in connection with other interests. The Crown Estate considers the draft to have been carefully researched and prepared, and believes that an appropriate balance has been achieved.	Support noted
General		Mr J. D. Cox	I hope that the Highland Council will eventually recognise the environmental damage that is being done to west Scotland by this unsustainable curse, and give the industry its marching orders. I am sure that Third World banana republics like Chile will be only too happy to take it over!	Whilst these comments do not relate specifically to the consultative draft of the Loch Bracadale Framework plan they are noted.

<i>Issue</i>	<i>Paragraph Organisation</i>	<i>Comments</i>	<i>Response</i>
General	Scottish Natural Heritage	It would be useful if the plan highlighted the fact that it does not consider strategic, or even West-Highland wide factors. Whilst we acknowledge that this is beyond the scope of this particular plan, it would be helpful to recognise the fact that a strategic approach is still required. In the absence of such an approach, reference should be made in the Plan to the relevant Structure Plan policies, which would help set in context the development framework for this loch.	Highland Council's aquaculture framework plans are designed to provide local rather than regional strategic planning guidance. They are however mindful of the wider context including the Scottish Executive's Locational Guidance. The Council would agree that the wider strategic dimension of policy on aquaculture in Scotland is relatively underdeveloped. However, the text of a local framework plan is perhaps not the most appropriate place to convey this concern because the picture may well change within the lifetime of the plan.
General	Scottish Natural Heritage	We commend The Highland Council for producing a well-structured plan, which is easy to read and follow.	Support noted
General	Scottish Landowners Federation	As one of Several framework plans presented in the same format, the Loch Bracadale Aquaculture Framework Plan is on the whole an extremely useful and timely document. 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, in particular aquaculture and tourism / recreation.	Support Noted
General	Mallaig & North West Fishermen's Association	We hold grave reservations about any further expansion of finfish farming in general, due to its detrimental effects on the environment, the fact that it encourages industrial fishing and the inability of the authorities to police it properly, especially with regard to ensuring that farms remain within the agreed locations.	The plan identifies limited opportunities for expansion of finfish sites in Loch Bracadale, small scale expansions of existing sites would be unlikely to lead to significant increases in industrial fishing, Given the increased economies of scale there may actually be the potential to reduce the feed conversion ratio of the sites and therefore reduce the quantity of waste feed entering the environment. 'Policing' of lease areas is at present the responsibility of the Crown Estate, although this is part of an ongoing review of planning powers.

<i>Issue</i>	<i>Paragraph Organisation</i>	<i>Comments</i>	<i>Response</i>
General	HM Naval Base Clyde	The draft is considered to be well thought out and easily digestible and there is no military input or amendment proposed by the Royal Navy as all our activity is based elsewhere in that region.	Noted
General	43 Scottish Natural Heritage	Para 43 – 48 – the numbering of these paragraphs in the 'Recreation and Tourism' and 'Roads' sections (page's 10 & 11) have been repeated	Paragraph numbering amended in final document
Why produce a plan for Loch Bracadale?	1 Mr P. Paget	Reference should be made to the Loch's attractiveness to recreational craft and as a place of safety between Canna and the outer Isles.	Additional information provided in the sections on Recreation and Tourism and Navigation to indicate the loch's attractiveness to recreational users.
Why produce a plan for Loch Bracadale?	2 Stolt Sea Farms UK Ltd	A significant number of jobs is, in my view, an underestimate - it is one of the area's largest employers, that should be quantified and included.	Approximate employment information at the time of writing is already included in paragraph 18. Paragraph 2 amended to indicate the presence of this information later in the text and, to indicate that aquaculture is one of the areas main employers.
Why produce a plan for Loch Bracadale?	3 Skye District Salmon Fishery Board	Reference is made to 'a limited amount of game fishing on the River Ose'. This should be expanded to include a reference to the River Drynoch, which also has some game fishing (I understand that catches on the Drynoch improved in 2001 compared to 2000). It is pleasing to note that there is more detail in Paragraphs 50- 55(page 12) regarding salmon fishing.	Text of paragraph 3 amended to include reference to the River Drynoch.
Planning Policy Background	5 Crown Estate	"...and for significant modifications to existing ones." to read " and for significant modifications to, and renewals of, existing ones."	Noted, Text amended
Planning Policy Background	7 Scottish Natural Heritage	The Local Nature Conservation Areas mentioned here, should also be identified in the 'Planning Issues' section, along with reference to the implications of these Local Plan policies.	Text of planning issues section amended to identify Local Nature Conservation Areas

<i>Issue</i>	<i>Paragraph Organisation</i>	<i>Comments</i>	<i>Response</i>
Objectives	8 Scottish Natural Heritage	The objectives detailed in section 8 are welcomed (especially objective 2). However, in some instances, the strategy and area policies (see specific comments below) may be unable to deliver these objectives. We recommend that each area policy is checked to ensure that it delivers the main objectives. Specifically, the area policies allow for further finfish developments at a number of locations around the loch.	The aim of the area policies collectively is to deliver the objectives detailed in section 8, and if necessary to strike an appropriate balance between them. It is unrealistic to expect each individual area policy to deliver all of these. Whilst the area policies are reviewed in the light of comments from SNH and other respondents to the consultation we do not consider that area policies which allow for finfish developments at a number of locations around the loch are contrary to the objectives of the plan.
Objectives	8 Scottish Natural Heritage	The inclusion of the objective to "maximise the general economic and recreational value of the loch", as one of the five objectives identified for the framework plan is welcomed. The economic importance of aquaculture development in Loch Bracadale has been highlighted but, in order to give a balanced approach, consideration might also be given to estimating the economic importance of recreational activities (e.g. diving, wildlife watching) and of the landscape/natural heritage in general (e.g. tourist facilities), or at the very least, this contribution should be acknowledged in the text.	Text amended to include reference to the tourist income to the Skye area and the number of visitors per annum to local attractions.
Objectives	8 Stolt Sea Farms UK Ltd	"identify infrastructure needs to support the sustainable development of aquaculture". Please define what you mean by "sustainable". I am getting increasingly frustrated about the frequency with which this word appears in relation to aquaculture. The very reason aquaculture exists is due to the fact that man could not sustainably manage wild fisheries, and that reckless plundering of our resources continues unabated; we have fished to the point of extinction, herring, whitefish, mackerel and decimated lobster numbers in the Minches and elsewhere and now prawn and crab are "under pressure" which is the latest euphemism I saw in print relating to the fishing quotas. So why is aquaculture less sustainable than fishing?	The plan does not suggest that aquaculture is less sustainable than fishing. It is important for the long term health and wealth of the Highland area and all its communities that all industries which exploit the natural environment do so in a way which does not undermine the ecosystems on which they and others depend and which does not compromise other legitimate interests

<i>Issue</i>	<i>Paragraph</i>	<i>Organisation</i>	<i>Comments</i>	<i>Response</i>
Settlements and Access	13	Marine Harvest Scotland Ltd.	Why not insert the financial benefit to the area? MH(S) can provide their figures and so might the others. Indirect and induced benefits would also be useful.	The purpose of paragraph 13 is to help 'set the scene' in terms of the scale and composition of settlements in the plan area rather than to demonstrate financial benefit. Reference to financial benefit would be more appropriate in the section on 'Economic Development' (para 28). A quantification of this should be independently verified.
Present Level Of Development	17	Scottish Natural Heritage	This states three shellfish/trestle sites, whilst figure 6 and the main policy map, both highlight five such sites. This inconsistency should be clarified.	Noted. Text/ policy map amended
Future prospects for Aquaculture Development		Scottish Natural Heritage	These [Separation distances] are referred to throughout the report. It would be useful if guidelines were given for these separation distances - possibly in an annex.	Accepted - text of future prospects section amended to include reference to separation distances
Future prospects for Aquaculture Development		Mr Neil Campbell	I believe that there is still scope for another large scale fin-fish farm perhaps to the North of Wiaiy	Noted, however this area should be undeveloped on landscape grounds on the advice of SNH
Future prospects for Aquaculture Development	21	Crown Estate	In paragraph 21, amend the most suitable sites in the area" to read the " the most suitable and generally acceptable. sites in the area..."	Noted - text amended
Future prospects for Aquaculture Development	21	Scottish Natural Heritage	This section would benefit from further clarification. It states that proposals for 'further expansion of the main sites are unlikely to be favoured'. However, a number of the area policies do not back this up.	The area policies are based on the characteristics and constraints found in the different sections of the coast rather than individual aquaculture installations which are a more temporary feature. This presumption in favour of finfish or shellfish development in an area which has such an installation (or installations) at present indicates that continued use is acceptable. It does not necessarily mean that expansion is acceptable. For this reason the presumption in favour (e.g. in Zone O) tends to be qualified. Text of relevant area policies amended to make this distinction clear.

<i>Issue</i>	<i>Paragraph</i>	<i>Organisation</i>	<i>Comments</i>	<i>Response</i>
Future prospects for Aquaculture Development	21	Scottish Natural Heritage	<p>Paragraph 21 states that the main opportunities are for small discrete installations, or for innovative solutions which can overcome the main constraints. We welcome the fact that landscape/amenity considerations have been identified as a potential constraint, and would note that technological advances do not necessarily overcome such constraints (e.g. visual impact of feed barges). We would recommend that specific area policies be drawn up for the outer loch, in order to influence developments, should such technological advances permit development, within the lifespan of this Plan. Paragraph 2 acknowledges that new technology may result in more exposed sites becoming viable.</p>	The likelihood of a proposal for an aquaculture installation in the middle of the mouth of the loch is remote. The outer boundaries of the existing policy zones are indicative rather than definitive to allow for the possibility of development at different distances from the shore. In effect this means that for any given location in the loch the nearest policy zone applies. The plan does not suggest that any technological advances, by definition, would overcome constraints in this area.
Future prospects for Aquaculture Development	22	Stolt Sea Farms UK Ltd	If land-based tanks ever became a commercial reality they would not be situated in Skye, more likely on the Clyde Coast or even the northwest of England to be closer to the markets.	Text amended to indicate that it would be more feasible for land-based tank systems to be located close to the markets.
Future prospects for Aquaculture Development	22	Marine Harvest Scotland Ltd.	Land-based tanks are not an economic prospect now or for the foreseeable future. The current price of salmon prohibits the cost of installation. Should these ever become a reality then their location need not be the west coast of Scotland but most likely closer to the market.	Text amended to indicate that it would be more feasible for land-based tank systems to be located close to the markets.
Future prospects for Aquaculture Development	22	Scottish Natural Heritage	<p>We welcome the acknowledgement that automated feed systems can conflict with landscape interests. However, it should be noted that feed barges can also have an impact on other natural heritage interests (e.g. through noise pollution). It should also be noted that there may be existing fish farm sites, where the installation of a feed barge would not be appropriate, on account of adverse landscape impacts. The Plan should recognise this as an issue and make reference to the recent SNH publication 'Marine Aquaculture and the Landscape: the siting and design of marine aquaculture developments in the landscape' (SNH, 2000).</p>	Text amended to make reference to possible noise pollution from automated feeders and to highlight that there may be sites where installation of feeders may not be appropriate. Reference to the SNH publication, 'Marine Aquaculture and the Landscape' included although this only makes limited reference to the issue of automated feeding systems.

<i>Issue</i>	<i>Paragraph Organisation</i>	<i>Comments</i>	<i>Response</i>
Future prospects for Aquaculture Development	23 Skye District Salmon Fishery Board	We are pleased at the reference in Paragraph 23 to the potential interactions with wild sea fish stocks. Already there are concerns which have been expressed regarding whether salmon farms have had an effect on wild salmon stocks. The only certainty is that salmon catches in all of Skye's rivers have dropped to almost zero in recent years.	Noted
Future prospects for Aquaculture Development	24 Scottish Natural Heritage	Paragraph 24 advocates the use of the precautionary principle to ensure the biological carrying capacity is not exceeded. However, this should also apply to the area policies, where the precautionary principle seems currently to relate.	Not entirely accepted. As stated in paragraph 24 no empirical research has been carried out into biological carrying capacity in Loch Bracadale, it is therefore difficult to build this into the area policies. In this regard the Council must rely on the modelling work carried out by SEPA to determine the maximum permissible biomass on a site-by-site basis. Since we do not know in advance what these biomass levels will be, and given the scenic nature of Loch Bracadale and the open, well-flushed hydrography of the outer loch, landscape capacity provides a broad indicator of the development capacity of the loch in the wider sense. Text amended slightly to make this clearer.
Future prospects for Aquaculture Development	24 Mr Neil Campbell	Much has been said about the carrying capacity, I was brought up on stories of the amount of fish in Loch Bracadale; resident populations of white fish, I can even recall in the late 60's catching a box of haddock in an afternoon on a regular basis. Shoals of herring and mackerel were to be found everywhere, I would suggest well in excess of the 3374 tons [of farmed fish] for which consent is presently granted.	Many west coast sea lochs have historically been important for inshore fisheries and large catches have been recorded. Whilst it is accepted that the current biomass of fish in the loch is perhaps less than would have existed in these historical wild fisheries, knowledge of the biological carrying capacity of a loch system, in relation to finfish and shellfish farming, is recognised by the aquaculture industry and scientists as being an important indicator of the maximum scale of activity which could be accommodated. Unfortunately very little hard data of this type is available.
Future prospects for Aquaculture Development	26 Marine Harvest Scotland Ltd.	MH(S) supports the concept of Polyculture	See response to Stolt Sea Farms UK Ltd on Paragraph 53 above.

<i>Issue</i>	<i>Paragraph Organisation</i>	<i>Comments</i>	<i>Response</i>
Future prospect s for Aquaculture Development	26 Stolt Sea Farms UK Ltd	Stolt Sea Farms would like to investigate the possibilities of polyculture and the farming of other Marine species.	Noted
Economic Development	Mr Neil Campbell	Harlosh Salmon has 8 staff, 7 are crofters and all were unemployed prior to commencement with the company	Text of section on economic development amended to indicate the number of jobs provided by fish farming.
Economic Development	Crofters Commission	As noted in your paper there are many crofting townships in the vicinity of Loch Bracadale. A significant number of crofters depend on the loch for some if not most of their livelihood. It is hoped that much consideration is given to the comments and concerns of such people who have a lifelong commitment to the area.	Comments by local residents are particularly welcome and all are taken into account.
Landscape and Visual amenity	Scottish Natural Heritage	Some of the landscape impact of aquaculture developments within Loch Bracadale is as a result of residual marine litter. The plan should highlight this problem, and suggest possible mitigation	Accepted. Text amended to include reference to residual marine litter, noting however that this may not come solely from aquaculture installations. Fishing vessels and recreational craft may also be implicated.
Landscape and Visual amenity	32 Scottish Natural Heritage	We welcome the acknowledgement that the most suitable sites are now occupied. Care should be taken to ensure that this is reflected in the area policies.	The fact that the most suitable sites are now occupied does not mean that all other sites are unsuitable. There may however be more constraints on development in these other areas. Text amended to make this clearer.
Inshore Fishing	Mr J.E. Marchington	You will also be aware of the decline in inshore fishing. At one time I could take a boat into Loch Harport and as a matter of routine, take a decent and varied catch. Now it is mackerel and dogfish with an occasional pollack close to the islands where the trawlers dare not net.	Text of inshore fishing section to include additional information on decline in catches

<i>Issue</i>	<i>Paragraph Organisation</i>	<i>Comments</i>	<i>Response</i>
Inshore Fishing	33 Mr P. Paget	<p>Creelers should be very concerned at SEPA's current licensing in Loch Bay of the use of Teflubenzuron (calicide) as an insecticide as it inhibits the growth of chitin in shellfish and is insoluble.</p> <p>It is only in Paragraph 18 of Appendix 4 that reference is made to "aspects of pollution, disease...."</p> <p>Does the Council intend to rely on SEPA alone - an organisation which seems to have conflicting terms of reference?</p>	<p>It is not unreasonable to point out that certain medicine treatments used on finfish farms to treat sea lice may have adverse side effects on other forms of marine life over a limited area. The Council is not however qualified nor empowered to regulate in this field and has to rely on the advice of SEPA and the Scottish Executive. Potential impacts of medicine treatments on other marine life are taken into account in the processing of applications for consent to discharge.</p>
Nature Conservation	Scottish Natural Heritage	<p>Figure 10 – symbols denote maerl = star, and sea pens = triangle. On the main policy map, these are reversed.</p>	<p>Symbols amended in key for figure 10.</p>
Nature Conservation	35 Scottish Natural Heritage	<p>Para's 35–38 – the Local Nature Conservation Areas (identified in the Local Plan) should be mentioned within this section, along with reference to the relevant Local Plan policy</p>	<p>Text of paragraphs 35-38 amended to include reference to the Local Nature Conservation Areas</p>
Nature Conservation	36 Scottish Natural Heritage	<p>All Biodiversity Action Plan species and habitats present in the area should be identified (possibly in an annex). Potential implications of the presence of these species on proposed developments should also be mentioned; i.e. a sentence stating that there is a responsibility to ensure their conservation. It would also be useful if the Area Policies highlighted areas where maerl and sea pens are present.</p>	<p>Text and area policies amended</p>
Nature Conservation	38 Scottish Natural Heritage	<p>It is useful that the presence of <i>Ascophyllum nodosum</i> ecad <i>mackaii</i> has been mentioned. However, it should be identified as a BAP species. A sentence should be added to the end of this paragraph, which states that care must be taken to protect these species and habitats, when development proposals are being considered.</p>	<p>Text amended to indicate the presence of BAP species and that care must be taken to protect these species and habitats when development proposals are being considered.</p>

<i>Issue</i>	<i>Paragraph Organisation</i>	<i>Comments</i>	<i>Response</i>
Nature Conservation	39 Scottish Natural Heritage	In an e-mail of 2nd March 2001, SNH advised [your office] that the information regarding the Sea-Eagles was sensitive, and they should be referred to in the broadest sense, as 'Schedule 1 birds'. SNH do not currently have a management agreement with the owners of the fish cages south of Bharcasaig Bay. We previously had such an agreement with Harlosh Salmon but this agreement expired when they sold out to Stolt. However, we are hoping to develop a similar agreement with the new owners in the near future.	Reference to sea eagles removed from final document and reference to agreement between SNH and Harlosh Salmon amended.
Nature Conservation	39 Mr P. Paget	Due to the sensitivity of eagles to poison, and to protect the resident population of white-tailed eagles, it should be an offence to leave uncovered any fish cages or fish food (which have been dosed with insecticide)	References to sea eagles removed from the document at the request of SNH. Enforcement of the Wildlife and Countryside Act in respect of noted species is an SNH / Scottish Executive responsibility
Nature Conservation	40 Scottish Natural Heritage	We recommend a sentence saying that the impacts upon otters should be taken into account, in any potential developments within the loch – including feed barges. It would also be useful to mention that otters are a protected species under the EC Habitats Directive, wherever they occur. The Scottish Executive guidance 'European Protected Species, Development Sites and the Planning System' (Scottish Executive, October 2001) explains the implications of this in more detail	Text amended to include suggested additions, noting however that communications with finfish and shellfish farmers in other sea lochs indicate that otters are often sighted in close proximity to feeding systems, cages and shellfish longlines and are apparently able to adapt to the presence of such installations.
Nature Conservation	41 Scottish Natural Heritage	We welcome the advice given that developments should take into account the presence of seals, and that anti-predator nets should be used as a means of deterrent. We advise that scaring devices should be used only as part of an anti-predator strategy, providing the source power level does not exceed 150 dB. SNH are currently developing guidance on the use of scaring devices, and their potential impacts upon non-target wildlife species. This will be available in due course.	Support noted. Text amended to include suggested advice on seal scarers.

<i>Issue</i>	<i>Paragraph Organisation</i>	<i>Comments</i>	<i>Response</i>
Water Quality	North of Scotland Water Authority	As a general rule we would like to make potential developers aware of the existence of our present and future discharge points so that these can be taken into account in any detailed site selection	Additional information added to section on Water Quality
Water Quality	North of Scotland Water Authority	Our main interest, as you would expect, is in relation to water quality. You mention the existing wastewater discharges into the area. We have three discharges at Carbost, Portnalong and Struan, the last two of which discharge into streams leading into the sea rather than direct discharges into the Loch. You will also be aware of the many private single discharges into the marine environment, the most significant of which is probably the Talisker Distillery at Carbost. We have plans to improve the discharge at Carbost, which will result in an improvement in water quality and could also see additional areas being connected to the public sewerage system.	Text to section on water quality amended to include reference to the presence of wastewater discharges and to note their locations.
Water Quality	43 Marine Harvest Scotland Ltd.	We object to the statement about local fishermen expressing concern "from time to time" that pollution from fish farms has an adverse impact on inshore fisheries. The statement is anecdotal and without foundation. Where is the factual evidence to support this allegation? In our experience we have local fishermen who fish right up to our pens on many of our farms.	It is a statement of fact that local fishermen have expressed concern about the impact of fish farm discharges on inshore fisheries nearby. The Council is not in a position to substantiate or deny this claim but considers it unlikely to be of significant concern provided that good practice is followed. The Council accepts that there may be other wider issues leading to the decline in inshore fisheries but this does not mean that fishermen's concerns about the impacts, howsoever localised of fish farm waste and therapeutants on shellfish stocks, should be dismissed. Text of paragraph 43 amended to indicate this.

<i>Issue</i>	<i>Paragraph</i>	<i>Organisation</i>	<i>Comments</i>	<i>Response</i>
Water Quality	43	Stolt Sea Farms UK Ltd	This is anecdotal evidence and has no foundation in Fact. Stolt Sea Farms strongly objects to the inclusion of hearsay in a document designed to help planners and the aquaculture industry meet the objectives mentioned in Paragraph 8	[See response to Marine Harvest Scotland Ltd comment on paragraph 43 above]
Water Quality	46	Marine Harvest Scotland Ltd.	This paragraph appears to contradict paragraph 26 which promotes polyculture	The polyculture referred to in paragraph 26 does not necessarily envisage shellfish cultivation in close proximity to finfish cages which would be directed towards human consumption. Paragraph 26 goes on to state that "the future introduction of such techniques on a commercial scale would require changes in legislation to allow more than one species to be grown on a site". Text of Paragraph 26 amended to state 'legislation and separation distance recommendations' and text of paragraph 46 amended to include reference to polyculture potential and the effects that this might have on indicative separation distances.
Recreation and Tourism		Royal Yachting Association (Scotland)	As you know we are mainly concerned with the navigational aspects and are pleased to see that you have included the designated anchorages and have referred to the Clyde Cruising Club Sailing Directions in Appendix 2.	Noted
Recreation and Tourism		Scottish Natural Heritage	The "Planning Issues" section highlights that upgrading of the sub-standard slip at Balmore near Harloch could increase the popularity of diving in Loch Bracadale and the "Landing Facilities" section identifies the lack of a good jetty for public use in west Loch Bracadale. It would be useful if these proposals were developed into the area policies.	Noted, however the area policies are for the development of installations for aquaculture production. Although the lack of slipway facilities is highlighted in the recreation and tourism section, the provision of slipways and landing facilities is outwith the scope of the framework plan process.

<i>Issue</i>	<i>Paragraph</i>	<i>Organisation</i>	<i>Comments</i>	<i>Response</i>
Recreation and Tourism		Mr J. D. Cox	I wish to express my absolute disgust with the salmon farming industry. In my opinion, Skye has been ruined by the ugliness of fish cages in just about every sea-loch; for an island that is so dependent on tourism, it is amazing that government agencies continue to encourage this activity.	All applications for new fish farm leases or proposals for significant expansion of existing fish farms have been subject to public consultation since October 1986. Each application is evaluated on its individual merits and in passing comment to the Crown Estate on these applications the Council takes close account of the balance of local opinion.
Recreation and Tourism		Scottish Natural Heritage	Consideration should be given to views of Loch Bracadale from prominent hills surrounding the plan area e.g. views experienced by walkers from Healabhal Mhor and from the northern end of the Cuillins. Although the views would be more distant, in the order of 5-10 km, the elevated position means that there could be a cumulative visual impact.	Noted. It is unlikely, however, that views of aquaculture installations from 5-10km away, will have significant adverse impact on views from the mountains even given the elevated position.
Recreation and Tourism		West Highland Anchorages & Mooring Association	You will know that yachting makes a significant contribution to the tourist industry in the Highland area. Furthermore, Loch Bracadale provides the only sheltered anchorages on this part of the Skye coast and this has implications for safety for both leisure and commercial boat operators. Therefore it is important that access to listed anchorages is not obstructed by finfish or shellfish farms. Unfortunately the sheltered areas suitable for anchoring also happen to be ideal for aquaculture developments. Fortunately you already seem to have this point in mind.	Noted
Recreation and Tourism	43	Marine Harvest Scotland Ltd.	Numbering sequence of paragraphs is wrong	Numbering of paragraphs amended
Recreation and Tourism	44	Scottish Natural Heritage	(page 11) - Some of the popular short walks cited in the plan text have been marked on the policy map. It would be useful if the other routes mentioned, (e.g. Ardmore to Harlosh Point, and the circular walk from Sumardale to Inver Meadale) were similarly shown on the map.	Policy map amended to include the suggested short walks

<i>Issue</i>	<i>Paragraph</i>	<i>Organisation</i>	<i>Comments</i>	<i>Response</i>
Recreation and Tourism	45	West Highland Anchorages & Mooring Association	As these anchorages may be needed as havens of refuge in bad weather and poor visibility it is important that they are properly marked by lit buoys. We appreciate that this is not your responsibility, but it is a point which we hope you will keep very much in mind. I am sure you will appreciate that a shellfish farm such as that illustrated on page 6 of the report can be difficult to see in poor visibility and could lead a vessel into serious danger if not well marked.	The Northern Lighthouse Board are routinely consulted in relation to aquaculture installations and indicate what navigational markings, if any, need to be used on each site. In the event that navigational markers are required it is the responsibility of the lease holder to ensure that these are visible and in working order.
Infrastructure	47	Marine Harvest Scotland Ltd.	Servicing of the feeding system is also from Kishorn.	Noted. Text amended to include Kishorn as a feed supply base.
Native Fish Stocks/ game fisheries		Mr J.E. Marchington	The Ose is primarily a sea trout river with the occasional run of small salmon, or more correctly, grilse. - Average is about 6lbs. The sea trout are small, a fish in excess of 1lb is unusual.	Noted
Native Fish Stocks/ game fisheries		Mr J.E. Marchington	My general view is that, solely from the point of view of the river, the less development in Bracadale the better. It is the activities of man that have ruined the salmon and sea trout populations on the west coast of Scotland and Ireland. To what extent the cause is salmon farming, forestry, commercial catching of sand eels, deep sea drift netting, or other factors we cannot be sure but we do know that as human populations and activities have increased so salmon numbers have gone down.	Text amended to increase reference to the range of potential causes of the decline in migratory fish stocks.

<i>Issue</i>	<i>Paragraph Organisation</i>	<i>Comments</i>	<i>Response</i>
Native Fish Stocks/ game fisheries	Mr J.E. Marchington	<p>I have written to various bodies expressing concern about the effect of salmon farms on migratory fish. At first the response was that there was no scientific evidence of this but at last the connection is accepted. Quite how much the Bracadale farm affects the Ose is questionable for it is some distance from the estuary. However it is a threat from an angle other than sea lice. Prior to the arrival of the farm there was a seal population at Harlosh point, as indicated on the plan. When the farm arrived off Tarner the seals took an interest and the salmon farmers took measures to discourage them. Presumably as a result of this there is now a haul-out in the mouth of the Ose with a dozen or so seals in residence. This concentration of seals at a narrow entrance to a small river must pose a major threat to migratory fish.</p>	Text amended to increase reference to the range of potential causes of the decline in migratory fish stocks and to include increased reference to seals.
Native Fish Stocks/ game fisheries	Mr J.E. Marchington	<p>You may not be aware that the late Captain Darby George carried out a regular annual survey of the salmon numbers in the six best salmon rivers on Skye. He told me that numbers had declined in all six but to a much greater extent in each of the three rivers which had salmon farms at their estuaries.</p>	Noted
Native Fish Stocks/ game fisheries	Skye District Salmon Fishery Board	<p>There is a clear need for research into the cause of the decline in wild salmon and sea trout numbers in order that steps can be taken to reverse the situation. It would be good if the plan could make some reference to such a need.</p>	Text amended to give greater emphasis to the range of potential causes of decline in migratory fish stocks and to make reference to research.

<i>Issue</i>	<i>Paragraph Organisation</i>	<i>Comments</i>	<i>Response</i>
Native Fish Stocks/ game fisheries	51 Stolt Sea Farms UK Ltd	Again the use of anecdotal evidence is unacceptable please remove such references from the final draft. I can provide you with the facts should you wish to consider them - sea trout and salmon stocks have declined steadily since the mid 50's, thirty years before the start of aquaculture. And the cause of the decline is multifactoral - overfishing, afforestation, acid rain, overgrazing, pollution from agriculture.	Text amended to indicate that there has been a long term decline in wild salmonid stocks which began before aquaculture started on the West Coast and this may be due to a mix of factors. Whilst it is accepted that the decline in wild salmonids commenced prior to the siting of fish farms it is also widely accepted that sea lice in association with finfish farming are a factor in the continued low numbers of fish returning to west coast rivers. The industry and regulators are now talking openly about relocation, synchronous stocking, fallowing and sea lice treatments and the production of AMA's has been advocated for this reason. Recent evidence to the Transport and Environment committee by a former Fisheries Research Services scientist also confirms this link.
Native Fish Stocks/ game fisheries	51 Mr J.E. Marchington	Paragraph 51 also states that 'catches of sea trout have declined in the years since fish farming has been developed'. This is of course correct but no mention is made of the grilse/salmon where the decline has been disastrous. Twenty to thirty years ago we could be confident that after a good spate in August and September there would be grilse on the Ose. Now I can fish in favourable conditions for several days without a touch or sight of a fish. As the joint tenant , Mr Mulford is able to send visiting anglers staying at the hotel to fish, but their results are few - at best one or two grilse in a season. In fact sea trout have fared a little better. Their numbers are but a fraction of the past but there is still the occasional run - usually fish of around 10 inches	Text of paragraph 51 amended to include reference to salmon
Native Fish Stocks/ game fisheries	51 Mr J.E. Marchington	Paragraph 51 is correct in suggesting that poaching has been very harmful, particularly on the river Snizort, but my local contacts suggest that this problem has now much diminished. The occasional resident may attempt to take 'one for the pot' but serious poaching for financial gain is unattractive.	Noted

<i>Issue</i>	<i>Paragraph</i>	<i>Organisation</i>	<i>Comments</i>	<i>Response</i>
Native Fish Stocks/ game fisheries	51	Marine Harvest Scotland Ltd.	Please remove the sentence " Anecdotal evidence from local estates suggests that catches of Sea Trout have declined in the years since fish farming has developed" " with no reliable statistics". This is a scurrilous comment given that you also refer to the small size, flow characteristics and poaching as "almost certainly" depressing stocks. We refer you to the attached graphs which highlight the decline of sea trout stocks on the west coast of Scotland. The first farmed salmon was produced only in 1971 well after the decline of wild stocks started.	See response to Stolt Sea Farms UK Ltd on Paragraph 51 above
Native Fish Stocks/ game fisheries	53	Stolt Sea Farms UK Ltd	Stolt Sea Farms support the AMA and Tripartite Working Group Initiatives fully.	Noted, although we have been advised that to date no Area Management Agreement has been signed for this management area.
Native Fish Stocks/ game fisheries	53	Marine Harvest Scotland Ltd.	MH(S) support the work of the TWG.	Noted although we have been advised that to date no Area Management Agreement has been signed for this management area.
Native Fish Stocks/ game fisheries	54	Scottish Landowners Federation	The plan recommends that an Area Management Agreement (as recommended by the Tripartite Working Group) between freshwater fisheries and finfish farm interests is drawn up before any modifications are made to existing finfish farm sites. This would appear pragmatic and responsible.	Support noted
Native Fish Stocks/ game fisheries	54	Scottish Natural Heritage	SNH support the idea that an Area Management Agreement should be drawn up. It would be useful if an indication could be given of the timescale for drawing this up.	Support noted. The Council would welcome the preparation of an AMA but since such agreements are voluntary between third parties it is not in a position to dictate timescales.

<i>Issue</i>	<i>Paragraph Organisation</i>	<i>Comments</i>	<i>Response</i>
Strategy and Area Policies	Scottish Natural Heritage	The draft policies give scope for additional small-scale shellfish developments within various zones throughout the loch. This potentially conflicts with the second Area Policy, in para 59. It would be useful if the Plan contained an assessment of the cumulative impact of development at all these sites. In the absence of this, how will the issue of cumulative impacts be addressed when the plan is implemented.	Noted. Although the issue of cumulative impact is not dealt with explicitly, an appreciation of the overall scale of development which would be both technically feasible and acceptable in policy terms underpins the area policies in the draft plan.
Strategy and Area Policies	Scottish Natural Heritage	In our response to your initial consultation (5th April, 2000), we identified certain areas as currently being over-capacity, in terms of landscape impact. We advise that the area policies should identify these areas, and commit to reducing the extent of aquaculture development in them, as and when seabed leases expire.	Aquaculture installations occupy a relatively small proportion of the Loch Bracadale coastline as a whole and in the drafting of the area policies the Council took the view that continued aquaculture current scale is acceptable in the areas indicted in the policy text. See detailed responses to SNH's comments on policy zones, G, K and M.
Strategy and Area Policies	59 Mr P. Paget	I would like to see a policy that: " Safeguards the interests of recreational craft to ensure the safety and integrity of existing recognised anchorages and the approaches thereto".	The Council's concern to ensure navigational safety and access to anchorages extends to commercial as well as recreational craft. New bullet point added to paragraph 59 which recognises the need to safeguard navigational access
Zone A	Scottish Natural Heritage	SNH supports this policy.	Support noted.
Zone B	Scottish Natural Heritage	SNH supports this policy.	Support noted.

<i>Issue</i>	<i>Paragraph Organisation</i>	<i>Comments</i>	<i>Response</i>
Zone C	Scottish Natural Heritage	Whilst we welcome the commitment to safeguarding public access, the policy regarding aquaculture development would appear to be contradictory with para 21, which states 'proposals for further expansion of the main sites are therefore unlikely to be favoured'. SNH therefore recommends a presumption in favour of small scale shellfish.	<p>The presumption in favour relates to the general principle of development in this area, not further development. A presumption in favour of small scale shellfish farming only would be difficult to accommodate given the existing finfish lease. It could however be considered in the event that the finfish lease is relinquished at any stage.</p> <p>The area policies in the plan generally are not built around existing leases because leases can disappear, change or come up for renewal within the timescale of the plan. On this basis the area policy is not incompatible with paragraph 21.</p>
Zone D	Scottish Natural Heritage	Policy would appear to be contradictory with the statement in para 21. SNH therefore recommends a presumption in favour of small scale shellfish farming only.	[See response to SNH comments on Zone C above]
Zone E	Scottish Natural Heritage	SNH supports this policy. However, it would be useful to give some indication of the distances that developments should be kept from the mouth of the River Drynoch. We welcome the commitment to safeguarding public access to the anchorage and pier.	The area policy indicates a presumption against finfish farming and there is not generally considered to be an issue between shellfish farms and salmonid fishing interests. In this situation an indication of the minimum separation distances between developments and the mouth of the river is unnecessary.
Zone F	Scottish Natural Heritage	SNH supports this policy. However, no mention has been made of the impact of aquaculture development on the Sumardale – Inver Meadale circular walk. We recommend that the amenity value of this recreational facility is also safeguarded.	Text amended to mention the amenity value of the Sumardale - Inver Meadale circular walk.

<i>Issue</i>	<i>Paragraph Organisation</i>	<i>Comments</i>	<i>Response</i>
Zone G	Scottish Natural Heritage	In our original submission, SNH advised that there should be no further development in this area, on account of the adverse impact upon the landscape quality of Bracadale Point. We maintain this view, and advise that there be a presumption against finfish farming in the eastern lee of Bracadale point. This would be consistent with the statement in paragraph 21. We welcome the commitment to safeguarding public access to the anchorage and jetty.	Not accepted. Bracadale Point is about 1 mile from the nearest vantage point which is likely to be frequented by members of the public. The site in the east lee of the point was carefully evaluated when the current lease there was applied for, and considered acceptable for small / medium scale shellfish farming in landscape terms.
Zone H	Mr P. Paget	Reference should be made to the occasional anchorage between Oronsay and Ullinish Point.	Text amended to indicate that there is an occasional anchorage between Oronsay and Ullinish point.
Zone H	Scottish Natural Heritage	SNH supports this policy. We particularly welcome the policy to safeguard the amenity value of Ullinish Point on account of its popular short walk and commanding view.	Support noted
Zone I	Scottish Natural Heritage	SNH supports this policy.	Support noted.
Zone J	Mr P. Paget	It is very important that installations near the restricted approaches to Tarner and Caroy are well buoyed.	Noted, however whether or not a site includes navigation markers as part of its lease conditions is determined by the Northern Lighthouse Board at the time of a lease application.

<i>Issue</i>	<i>Paragraph Organisation</i>	<i>Comments</i>	<i>Response</i>
Zone J	Scottish Natural Heritage	<p>Turner Island is described in the text as 'one of the most important landscape features in the loch'. However, this statement is not supported in the Policy, where there is a presumption in favour of small to medium scale finfish farming. SNH advise that there be a presumption against any development in this zone, and that the existing lease not be renewed. This would be consistent with the statement in paragraph 21, and the second main objective in paragraph 8.</p>	<p>The presumption in the area policy is in favour of continued use of the finfish site which already exists. It is not in favour of any expansion and this could perhaps have been made clearer. The text has now been amended accordingly. It would be unreasonable to have a policy suggesting that the lease should be relinquished unless there are demonstrable adverse impacts on the natural heritage interests of the surrounding area. Turner Island is a key feature in the loch but one which is generally viewed from 2km away or more. Limited development here, at the least conspicuous part of the island, is preferable on landscape grounds, to development at Harlosh Point or Harlosh Island.</p>
Zone K	Scottish Natural Heritage	<p>In our original submission, SNH advised that there should be no further development in this area, and that it would be preferable if the existing development is reduced in extent and numbers. SNH maintain this view, and this would be consistent with the statement in paragraph 21. It would also be useful to give some indication of the distances that developments should be kept from the mouth of the River Caroy.</p>	<p>Only the inner reaches of Loch Caroy are sufficiently sheltered for aquaculture and the leases here are long established. The area policy is not in favour of expansion. It favours the principle of aquaculture use in this zone with the provisos attached. This is not incompatible with para 21. These provisos should ensure that the relevant issues are taken into account when the leases here come up for renewal or modification. SNH would have to make a good case for reducing the scale of the existing development at that stage. We have not received any expressions of discontent about the scale of development here from the local community during consultation on the draft plan.</p>
Zone K	Mr P. Paget	<p>It is very important that installations near the restricted approaches to Turner and Caroy are well buoyed.</p>	<p>Noted, however whether or not a site includes navigation markers as part of its lease conditions is determined by the Northern Lighthouse Board at the time of a lease application.</p>
Zone L	Mr Neil Campbell	<p>The seal haul-out is actually on Harlosh Island, not at Harlosh Point.</p>	<p>We are advised by SNH and other respondents that Harlosh Point is the main haul out. Text of area policies for Zone L amended to indicate that seals also haul-out at Harlosh Island.</p>

<i>Issue</i>	<i>Paragraph Organisation</i>	<i>Comments</i>	<i>Response</i>
Zone L	Scottish Natural Heritage	SNH supports this policy. However, the statement 'the only site sheltered from SW winds is the area to the southeast of Harlosh Point' may be construed as meaning that development is acceptable in this location.	Text amended to make policy clearer.
Zone M	Scottish Natural Heritage	In our original submission, SNH advised that there should be no further development in Loch Vatten on account of the landscape qualities of the area. We maintain this view and this would be consistent with the statement in paragraph 21.	The level of development envisaged in the area policy is small and it has to be compatible with the landscape interest. Only two small sites are likely to be feasible, but the Council feels it is important to allow for such small scale opportunities rather than suggest sweeping presumptions against development without strong justification.
Zone M	Mr P. Paget	It is very important that installations near the restricted approaches to Loch Vatten are well buoyed	Noted, however whether or not a site includes navigation markers as part of its lease conditions is determined by the Northern Lighthouse Board at the time of a lease application.
Zone N	Mr P. Paget	Bharcasaig is probably the most important refuge anchorage in Bracadale and must be protected.	Noted. Policy text amended to acknowledge value of this area as an anchorage.
Zone N	Scottish Natural Heritage	SNH supports this policy.	Support noted.
Zone N	Mr Neil Campbell	We [Harlosh Salmon] found it essential to moor boat's, barges etc in Varkasaig Bay particularly over the winter period. Visual amenity for Mr _____ may be important to him but 8 jobs is more important to the wider community.	Noted. The popularity of Varkasaig Bay as a walking and picnicking spot, suggests that the amenity of this area is important to more than just one local resident. Notwithstanding it is reasonable to expect operators to show consideration for the amenity of individual residents in the conduct of their operations.

<i>Issue</i>	<i>Paragraph Organisation</i>	<i>Comments</i>	<i>Response</i>
Zone O	Scottish Natural Heritage	We draw your attention to the statement in paragraph 21, and our original advice, which states that this area cannot accommodate any further development than currently exists. We maintain this view, and advise that there be no further development within this zone.	The policy for Zone O reflects that fact that all things considered , it is one of the more suitable sites in the loch for aquaculture development. However this does not give <i>carte blanche</i> to expansion of existing installations. On the contrary, development proposals have to avoid prejudicing other interests and this may preclude expansion of the existing installation. The policy relates to the zone as a whole and is not built around the existing lease which could lapse or be the subject of an application for renewal or modification within the lifetime of the plan. This is not incompatible with the statement in paragraph 21 that proposals for further expansion of the main sites are unlikely to be favoured.
Zone O	Mr P. Paget	The large installation south of Bharcasaig is serviced by craft from Harlosh. Being on the approaches to the anchorage, all installations must be well buoyed.	Noted, however whether or not a site includes navigation markers as part of its lease conditions is determined by the Northern Lighthouse Board at the time of a lease application.
Zone P	Scottish Natural Heritage	SNH supports this policy.	Support noted.

<i>Issue</i>	<i>Paragraph Organisation</i>	<i>Comments</i>	<i>Response</i>
Appendix 2	Scottish Landowners Federation	<p>In considering development proposals the Council makes reference to policies and guidance issued by the Scottish Executive and other relevant authorities which are listed in Appendix 2 - bibliography. Included in this bibliography is Salmon Rivers of Scotland by Derek Mills and Neil Graesser (published in 1981). Although well written and a useful reference for the larger and better known rivers of Scotland, wildly exaggerated catch numbers are quoted - quite possibly not the fault of the authors - for the smaller west coast rivers. Regrettably the book has been used as reference for several important works and articles in the national press (Wester Ross Fisheries Trust reports and Michael Wigan) which have sought to explain the extinction of wild stock in these rivers. For more accurate information, Highland Council may wish to verify catch statistics by interviewing Fisheries Trust Officers or River Boards (providing their information is based on actual catch numbers reported by river owners).</p>	<p>Noted. The bibliography includes general references to the area as well as guidance documents sponsored by the Scottish Executive and others. The plan has not used the Mills and Graesser book for catch statistics but for general information on the character of the Skye rivers.</p>
Appendix 2	Scottish Natural Heritage	<p>Bibliography should contain: Skye and Lochalsh Landscape Character Assessment (SNH, 1996), 'Marine Aquaculture and the Landscape: the siting and design of marine aquaculture developments in the landscape' (SNH, 2000). 'European Protected Species, Development Sites and the Planning System' (Scottish Executive, October 2001)</p>	<p>Bibliography amended to contain suggested additional documents.</p>

APPENDIX 2 - ORGANISATIONS CONSULTED IN PREPARATION OF THE PLAN

Aquascot
Association of District Fishery Boards
Association of Salmon Fisheries Boards
Association of Scottish Shellfish Growers
Association of West Coast Fisheries Trusts
Association for Protection of Rural Scotland
Atlantic Salmon Trust
British Marine Finfish Association
Coillore Farm
Crofters Commission
Crown Estate
Dunstaffnage Marine Laboratory
Dunvegan & District Community Council
Dunvegan Estate
Federation of Highlands & Islands Fishermen
Greshornish Shellfish
Highlands & Islands Fisherman's Association (Stattic Gear)
Highlands and Islands Enterprise
Highlands of Scotland Tourist Board
HM Naval Base Clyde
Mallaig & North West Fisherman's Association
Marine Harvest (Scotland) Ltd
Maritime and Coastguard Agency
Meadale Farm
Minginish Community Council
North of Scotland Water Authority (now Scottish Water)

Northern Lighthouse Board
Royal Society for the Protection of Birds
Royal Yachting Association (Scotland)
Scottish Anglers National Association
Scottish Crofters Union
Scottish Environment Link
Scottish Environment Protection Agency
Scottish Executive:
 Environment and Rural Affairs Department
 Scottish Fisheries Protection Agency
 Shipping Services Branch
Scottish Landowners Federation
Scottish Natural Heritage
Scottish Natural Heritage - Maritime Branch
Scottish Quality Salmon
Scottish Wildlife Trust
Sea Fish Industry Authority - Aquaculture Unit
Skye & Lochalsh Enterprise
Skye District Salmon Fishery Board
Sport Scotland
Stolt Sea Farms (UK) Ltd
Struan Community Council
Struan Jetty Users Association
Sumardale Farm
Talisker Distillery
West Highland Anchorages & Mooring Association
West of Scotland Fish Producers Organisation

In addition, the following individuals submitted comments:

Mr Neil Campbell
Mr J. D. Cox
Mr J. E. Marchington
Mr P. Paget