

## ANNEX 4

### Pre- Application Consultation Report

#### Introduction

There is no formal requirement to seek pre-application advice or undertake pre-application consultation in relation to the development of fish farms of less than 2 hectares equipment surface area. However, OSH notes that pre-application consultation is recognised good practice and has committed to ensuring that wherever possible the views of stakeholders are considered in progressing the development of its sites and facilities.

To this end OSH submitted a formal request for pre-application advice to The Highland Council in December 2016. This was followed up with a written pre-application request to the planning consultees and other regulatory bodies in January 2017. A Pre-Application meeting was held with consultees on 26<sup>th</sup> January 2017, with follow up email and telephone communications with individual consultees.

As plans progressed Directors of OSH met with relevant community groups and held a public drop in session in Staffin on 10<sup>th</sup> February 2017. Identified stakeholders were invited to this event and it was advertised in the West Highland Free Press. The intention of the drop-in session was to increase the opportunity for local issues and concerns to be considered ahead of the submission of planning applications.

This report details the timeline of the pre-application process undertaken by OSH, outlines the feedback provided by stakeholders and consultees, and documents how advice received was considered in finalising proposals for the sites. It also highlights occasions where, to the best of our knowledge, proposals have been reported in the circulated press and on social media.

Date	Action and Outcome
Autumn 2015 to Spring 2016	Preliminary site selection undertaken by Fish Vet Group on behalf of OSH. Further details provided in the alternatives considered section of the ES. Process involved meetings with Highland Council to discuss initial proposals and with SNH to discuss potential impacts on National Designations.
13 <sup>th</sup> September 2016	Telephone conversation with Mark Harvey, THC Development and Infrastructure service advising of site plans in general terms and raising possibility of meeting to discuss Pre-Application / Application process.
23 <sup>rd</sup> September 2016	In anticipation of reports being presented to the AGM of Staffin Community Trust, the following organisations were informed that fish farms were planned and that pre-application consultation would follow.

	<p><b>Skye District Salmon Fishery Board:</b></p> <p>Verbal reply by phone: Main concern is escapes, there is some serious poaching being undertaken both from land and sea in the NE of Skye and he thought likely that they would target caged fish when big enough.</p> <p><b>Scottish Natural Heritage</b>, Alex Turner – Area Officer:</p> <p>Suggested that pre-app advice sought from the Council at an early stage. We are also happy to provide pre-app advice, clearly issues like landscape, sea lice and the use of ADDs will be particularly important along that coastline.</p> <p><b>The Highland Council</b>, Mark Harvey, Team Leader Development and Infrastructure Service:</p> <p>When the farm project has reached an appropriate stage we would recommend using our pre-application service to help address the main issues as early as possible. Happy to discuss further it will be the first organic farms that the current teams have encountered.</p> <p><b>Scottish Environment Protection Agency</b>, Andy Rosie – Operations Manager (North):</p> <p>Acknowledgment received.</p> <p><b>Marine Scotland Science</b>, Anna M Donald, Fish Farm Planning Team:</p> <p>Please do not hesitate to contact us in the future if you require further advice.</p>
27 <sup>th</sup> September 2016	<p>Directors of OSH Ltd attended Staffin Community Trust AGM, and outlined proposals for two fish farm sites south of Staffin and sites to the north.</p> <p>Feedback from meeting that it was felt important that impact on views from the Lealt viewpoint overlooking the diatomite plant be minimised.</p> <p><b>ACTION BY OSH:</b></p> <p>Initial proposals for 14 x 120m circles in a 7 x 2, 80m mooring grid on each of the Invertote and Culnacnoc sites were reduced to 12 x 120m cages and the sites moved North and South from their intended positions to reduce the extent to which the sites would be visible from the viewpoint.</p> <p>Plans for a new viewing platform and walkway to overlook the waterfall in Lealt gorge were also considered to confirm that there was no prospect of the revised extent of the sites being significantly visible from the new viewpoint.</p>
7 <sup>th</sup> November 2016	<p>Email and outline plans sent to <b>Northern Lighthouse Board (NLB)</b> and <b>Maritime and Coastguard Agency</b> seeking advice in relation to navigational marking requirements.</p>

	<p>NLB responded on 23<sup>rd</sup> November 2016 providing details on the expected navigational requirements. Advice that all sites be marked with 2 lit marker poles (FL(4) Y 12s) at the seaward extremities of the fish cages and that any feed barge is marked with and all round white fixed light. Advice was subject to review once final site position coordinates are confirmed.</p> <p>No reply was received from Maritime and Coastguard Agency.</p>
2 <sup>nd</sup> December 2016	Request for formal pre-application advice for a local development submitted for sites at Culnacnoc and Invertote:
9 <sup>th</sup> January 2016	Letters sent to, Skye DSFB, Marine Scotland Science – Fish Farm Planning, Marine Scotland Science – Fish Health Inspectorate, Marine Scotland – Licensing Operations Team, Scottish Environment Protection Agency, Scottish Natural Heritage and copied to Staffin Community Trust. Documents previously submitted to THC copied to these organisations with a request for written advice on planning aspects of the developments and views that they might have in relation to their own Licencing/ Authorisation. Organisations were also asked to advise availability for meetings to discuss pre-app.
10 <sup>th</sup> January 2017	Email sent to Mark Harvey to advise that pre-application information had been sent to the above bodies. Advised that availability had been sought for meetings during the weeks of 23 <sup>rd</sup> January or 6 <sup>th</sup> of February. Attendance invited.
11 <sup>th</sup> January 2017	<p>Acknowledgements of receipt of Pre-Application request received from:</p> <p><b>Marine Scotland Science</b>, Confirmed receipt by Aquaculture Planning Team and Fish Health Inspectorate. Checking availability for meeting and seeking to meet by VC if possible.</p> <p><b>SNH</b>, Offer to host meeting of consultees with video conference facilities.</p> <p><b>SEPA</b>, Will consult with our Marine Science and Regulatory staff and provide pre-planning advice to you by the end of this month.</p> <p><b>Marine Scotland – Licensing Operations Team</b>. Do not usually provide comments on applications for planning permission. As we are not a consultee of the planning process, it would not be beneficial for a representative from MS LOT to attend your proposed pre-application meeting.</p>

26<sup>th</sup> January  
2017

Consultee Meeting at SNH Portree attended by OSH, THC, SNH and Skye DSFB with Marine Scotland Science (including Fish Health Inspectorate) and SEPA attending by video conference. Key points discussed as follows:

Agent made presentation on the current plans for the site, and invited comments on specific identified impacts and OSH approach to assessing these impacts. Discussions included:

Economic Development

OSH intends to prepare analysis of economic benefits arising from the development. Advised to ensure that the benefits of the development were presented in support of an application along with analysis of possible impacts on other sectors.

Inner Hebrides and Minches candidate Special Area of Conservation (cSAC) for harbour porpoise.

OSH sought availability of data from SNH on the presence of porpoise and advice as to any additional data that may be required. SNH position that noise and entanglement are the main risks to the SAC features of interest.

Porpoise Data available from SAC consultation web site. There would be no benefit to seeking additional survey. Discussion centered around the hierarchy of predator control on site, loose cage nets and predator nets may present a risk to porpoises so must be avoided.

The use of gill nets to recapture escapees would also present an entanglement risk. OSH should Consider not using ADDS. If this is not possible other mitigation would be necessary, such as frequencies outwith cetacean hearing range. ADDS would require protocols for use, protocols for audit of use and record keeping.

Wild Salmonid Interactions

(included discussion of fish health aspects)

OSH Need to provide FHI with grid reference of mid-point of sites.

MSS would require details of the effectiveness of treatments on 120m circles and experience at other sites. Discussions around the number of treatments and medicine to be applied for and medicine availability. Full sea lice treatment strategy required in support of an application.

Stocking plan needs to be clarified and needs to demonstrate that fish health management and lice control is possible under Organic Standard.

MSS staff from Pitlochry need to feed into MSS consultation response, OSH need to meet with Pitlochry Staff ahead of pre-

	<p>app response being submitted, OSH to arrange and include SDSFB in meeting.</p> <p>Expectation that MSS would be lead agency in providing advice on wild salmonid interactions.</p> <p>Former Area Management Group now reconvened as Skye Salmonid Management Group, next meeting in March, OSH could attend.</p> <p><u>Landscape / Seascape</u></p> <p>Sites outwith NSA but impact on views from the NSA are a consideration, refer to NSA special qualities document. Sites within Special Landscape Area, refer to SLA documents. Full LVIA will be required. Must consider Noise, light and boat activity. Feed Barge design a significant consideration, boat-like colour scheme unlikely to fit at this location. Need ZTV analysis to confirm views from key viewpoints.</p> <p>Investigate reorientation of North site to allow for better alignment with coastline. Document that the headland at “The Brothers” has been considered.</p> <p><u>Benthic Impact</u></p> <p>No issues with the information submitted to date. Dependent on the quality of the video produced.</p> <p>No records for PMFs at this location, video survey would add to overall knowledge of the area. SNH and THC would defer to SEPA on video transect requirements.</p> <p>SEPA model change imminent, additional modelling and benthic grabs may be required.</p> <p>Nutrient enhancement modelling required, CAR applications for full suite of medicines and treatments.</p> <p><u>Sea Eagles</u></p> <p>Need to contact RSPB for advice on whether there are concerns regarding Sea Eagles in relation to the sites. General guidance: no equipment closer than 1km and no development during nesting.</p> <p>ACTION: RSPB contacted by telephone and email week of 30<sup>th</sup> January. Returned advice that unaware of activity at this location. However, there may be a need to survey nesting sites for Black Guillemot at the Brothers.</p> <p><u>Servicing</u></p> <p>Location and site details for servicing to be included in and considered in EIA report and accompanied by statement of alternative considered.</p> <p>Integral to the site so although not required to be included in the planning application must considered in the ES.</p>
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Week beginning 30 <sup>th</sup> January 2017	<p><u>Preparation for public meeting</u></p> <p>Notice placed in WHFP advertising public drop in day on 10<sup>th</sup> February 09:00 to 21:00 at Staffin Community Hall. Notice ran on 3<sup>rd</sup> February. Copy of notice sent to RYA, Fishermen's interests, Local Interest groups.</p>
2 <sup>nd</sup> February 2017	<p>Outline site information sent to Defence Infrastructure Organisation, Marine Safeguarding seeking advice on potential interactions between the sites and military use.</p>
3 <sup>rd</sup> February 2017	<p><u>Feedback from Royal Yachting Association</u></p> <p>Advised that notification of meeting would be circulated, and that RYA would be contacted by Highland Council about the application and it is a consultee for the Marine Licence process.</p> <p>Clyde Cruising Club <i>Sailing Directions and Anchorages: Ardnamurchan to Cape Wrath</i>, makes no mention of any anchorages at either Invertote or Culnacnoc. There are two anchorages in Staffin Bay although no mention is made of the slipway.</p>
9 <sup>th</sup> February 2017	<p>West Highland Free Press</p> <p>Report on front page detail reiterating advertised details of the public drop in day.</p>
10 <sup>th</sup> February 2017	<p>A public drop in day was held at Staffin Community Hall on 10<sup>th</sup> February 2017 commencing at 09:00 and finishing at 21:00. At the event the company displayed posters related to the developments at Invertote and Culnacnoc and set out the issues that the company will be considering ahead of submitting its applications. Draft visualisations of the sites from key viewpoints were available to view. Information was provided on the preliminary studies undertaken and there were posters and video feed showing possible equipment to be used on the site. OSH Directors were on hand to answer questions. Leaflets were available summarising the information on display and a feedback form was available for comments and contact details. Copies of this information and the form are attached at the back of this report. Any personal details collected were retained on the basis that they would not be passed on to third parties and that any comments made would be non-attributable.</p> <p>A summary of the issues raised and the response on behalf of OSH is set out below.</p> <p><u>Lack of information on proposed developments to the North of Staffin</u></p> <p><u>Response</u> - The open day focused on the proposed developments at Invertote and Culnacnoc as had been advertised in the West Highland Free Press. OSH plan to hold a similar event in the future for the North Sites as the plans progress.</p> <p><u>Employment</u> – Generally, visitors recognised the importance of the jobs that the development offers. There was significant interest in the number of jobs that would be offered on the site. Three separate</p>

	<p>visitors enquired about working on the sites if developed, as they were seeking to move back to the area. Others noted that they supported the proposals and hoped that employment opportunities would be realised. Other visitors cautioned that whilst jobs were important they should not be at the expense of existing employment opportunities. They should be genuine new jobs rather than displacement of employment.</p> <p><u>Response</u> - Supporting information for the final planning application will include and assessment of the direct employment on the site and will present figures for downstream employment based on recognised multipliers. This will be balanced by assessment, where figures are available, of any displacement of employment from other industry or enterprises because of the fish farm.</p>
	<p><u>Tourism</u></p> <p>Visitors to the area come for the scenic landscape and outdoor activities which is very important to the local economy.</p> <p><u>Response</u> - The Environmental Impact Assessment will consider the impact of the developments on landscape and seascape and will, where figures are available, assess the impact of the development on tourism. If required, mitigation measures will be proposed which will reduce the possibility of impact on tourism businesses.</p>
	<p><u>Wild salmonids</u></p> <p>There was significant interest in the impact that developments might have on wild salmonids, how the developer would manage sea lice and escapes, impacts on Salmon in the Lealt River the Kilmartin River and Sea Trout in the wider environment.</p> <p><u>Response</u> - OSH will be required to have a full sea lice management plan, escapes management plan and fish health plan in place prior to the submission of a planning application. Whilst these plans will be aimed at maintaining the health of the fish farmed on site adherence to management measures will serve to reduce the potential for impacts on wild salmonids.</p>
	<p><u>Organic Status</u></p> <p>A small number of visitors questioned the proposed organic status “How can anything in the sea be organic?”, “What elements of the production will be organic?” etc.</p> <p><u>Response</u> - Organic Sea Harvest will farm salmon to the Organic Standards set by the Soil Association. Ultimately this will be, self-regulating in that if the standard is not met and the Organic Status is lost any fish sold are likely to be sold at reduced prices leading to financial loss to the business.</p> <p>The Soil Association Standard ensures compliance with the European Union definition of “Organic Status”. This requires organic brood stock lines, organic feed in the hatchery and freshwater stages and organic</p>

	<p>feed throughout the lifecycle, it also stipulates the number and type of medicinal treatments permitted.</p> <p>In terms of the determination of a planning application, whether the site farms conventional or organic salmon is not likely to be a key consideration per se as the definition of organic status is set out with the Planning Acts. The organic status is however of relevance in relation to the wider environmental impacts of the site.</p> <p>For example, in considering the impact on wild salmonids. OSH will be required to demonstrate that it can manage sea lice on its sites using the lower levels of treatments stipulated by its organic status.</p>
	<p><u>Commercial Fishing</u></p> <p>It was felt that the development at Culnacnoc would encroach on an area currently used by prawn trawlers. These may be displaced from the ground thus fishermen that attended stated that they were not against the development but felt that further discussion was necessary to investigate whether there was scope to alter anchor positions to minimise loss of ground.</p> <p>Response - Contact details were left with the fisherman with a view to him providing images of track plots to inform further investigation.</p> <p>It was emphasised to fishing interests that the Crown Estate lease area depicted on the displayed plans was larger than the intended final extent of the sites. The envisaged extent of the anchors was not known so the cage positions depicted at the event were not necessarily the agreed final positions.</p>
	<p><u>Impact of the development on residential properties.</u></p> <p>It was emphasised that sites had been chosen to minimise the extent to which they could be viewed from residential properties, the A855 and key viewpoints. A small number of attendees sought guidance as to whether the sites would be visible from their property. "Will the sites be visible from my house?"</p> <p>Response – LVIA will include an assessment of the Zone of Theoretical Visibility which will enable residents to assess whether the sites will be visible from their property.</p>
	<p><u>Landscape and Visual Impacts</u></p> <p>There was considerable interest in the photomontages showing the presence of the sites in views from the existing Lealt viewpoint, the Layby Viewpoint south of Invertoe, and the view from Brothers Point.</p> <p>Several visitors noted that steps had already been taken to reduce the visual impact from the Lealt view point by moving the cage groups further apart and reducing the number of cages. It was commented that every effort should be made to hide sites from views and from tourists.</p> <p>The main area of concern expressed was the impact on views from Brothers Point and it was noted that it is a popular picnic area. It was suggested by others that in the main people visiting the Brothers tended</p>



	<p>to stay to the North Side of the peninsular which involved a scramble across the foreshore and that visitors tended to seek views of Kilt Rock and the waterfall to the North.</p> <p><u>Response</u> - The figures on display at the event demonstrated preliminary visualisations from three key viewpoints and demonstrated cumulative views of the sites. The final application will require to be supported by detailed Landscape and Visual Impact Assessment which will assess the visual impacts of the proposals in the context of the landscape and seascape and the associated landscape character. Finalised Visuals will be available for public comment as part of the planning application process.</p>
	<p><u>Noise Impacts</u></p> <p>Concern was expressed regarding the potential for noise emanating from the site to be audible at sensitive locations.</p> <p><u>Response</u> - Noise sensitive locations will be identified during the process of preparing supporting information for the EIA and assessment of background noise at these locations will be carried out if the Council deems this necessary.</p> <p>It is expected that noise impacts may be controlled by a planning condition stipulating maximum noise levels during day and night from these sensitive locations.</p> <p>It is noted that there is likely to be existing background noise associated with livestock, watercourses, roads and humans and that these noise levels will figure in any assessment.</p>
	<p><u>Light Impacts</u></p> <p>Visitors to the event were consistent in recognising the value that they placed on dark night skies and that they had seen sites in other locations heavily lit at night.</p> <p>The importance of dark skies to winter tourism and the existing lack of sky glow making the area valued for star gazing and aurora watching was also recognised.</p> <p><u>Response</u> - OSH recognises the importance of retaining dark skies and shares concerns regarding the excessive use of worklights. Light impacts will be assessed as part of the EIA and will be considered in the LVIA.</p> <p>It is anticipated that the use of lights will be limited by planning condition, however OSH will undertake to use low level lighting which is downward facing and extinguished when not in use. There is likely to be a need to have some form of motion sensitive security lights and could involve the use of infrared security cameras on the site.</p> <p>If it is considered necessary to use underwater lighting to control the maturation of fish on the site this may present as a green glow during winter months. This will be assessed as part of the LVIA with a view to the planning application considering its use.</p>

	<p><u>Why were these sites chosen?</u></p> <p>Concern was expressed that the sites would be visible from key walking routes and that greater consideration of this should have been taken in deciding what sites to use.</p> <p><u>Response</u> - It is a requirement of the EIA regulations that the Environmental Statement will include analysis of alternatives considered. This analysis will set out the criteria chosen for site selection.</p> <p>OSH will investigate the feasibility of analysing of the percentage of the coastal footpath that will have reasonably close quarter views of the site.</p> <p>If information is available OSH will also investigate the relative proportion of visitors using the coastal viewpoints vs those using inland viewpoints near the sites, the Quirang, for example.</p>
	<p><u>Impacts of fish farming.</u></p> <p>Attendees asked where they could get independent information on the impacts of salmon farming.</p> <p><u>Response</u> – There are several sources of information on the environmental impacts of salmon farming including scientific studies and documents prepared by the industry, regulators and professional anti fish farming lobbyists. We are not aware of any sources of information that could be described as truly independent, all having been funded by specific areas of interest. Ultimately, development will be guided by the background policies of the statutory consultees. Most organisations have publically available position statements on Aquaculture, and in most cases these policy positions have been reached in processes including both industry and stakeholders.</p>
	<p><u>Quality of swimming waters</u></p> <p>Visitors describe the use of the area by lots of swimmers, and local companies such as Skye Adventures which run Coaststeering trips.</p> <p><u>Response</u> - The sites are outwith any bathing water protected areas designated under the water framework directive. This means that there are no additional restrictions on discharges from sites other than those considered by SEPA under the Controlled Activities Regulations.</p> <p>There are significant areas of Scotland where the recent increase in popularity of wild swimming may bring swimmers into contact with fish farms, and other semi industrial operations. For example there are organised swims in the Clyde Estuary, Cromarty Firth and Swimmers regularly choose routes past freshwater fish farms in the Great Glen.</p>
	<p><u>Unspoiled nature of the area.</u></p> <p>Feedback forms described the unspoiled nature of the area “This is one of the last remaining unspoiled dramatic areas with no human intervention...”</p>

	<p>Feedback forms also asked that measures should be considered “Lessening impact as far as possible upon the “Jewel of Skye”, the unspoilt Trotternish!!”</p> <p><u>Response</u> – Whilst it is accepted that the current levels of development in the area are lower than in other areas in Highland it is not considered that the immediate area is in any way pristine. The Highland Coastal Plan notes that the coastline here is “Undeveloped” rather than “Isolated” this classification is based on the criteria set out in the former NPPG13 published by Scottish Ministers. NPPG13 was subsumed into Scottish Planning Policy in 2010. SPP no longer recognises coastal classification as anything other than Isolated.</p> <p>It is noted that the area is a long way away from anywhere that is “wild land” one of the criteria for consideration as wild land is lack of evidence of human influence.</p> <p>Human intervention is evident in forestry blocks, footpaths, viewpoints, roads, quarries etc inland of the sites which would presumably not have been without impacts. Equally the historical remains of diatomite processing plant are indicative of a former industrial past in the area.</p> <p><u>Road Use</u></p> <p>Concerns were expressed about vehicle numbers on the access road to the Harbour, the possible number of HGVs, possible disruption to tourists who visit the Island.</p> <p>Response - In the first instance only small vehicles and vessels will be using the harbour. Large deliveries will be placed on a boat in Kishorn and brought to the site with feed deliveries. Impacts on road and the number of vehicle movements will be assessed during the preparation of the planning application. In the longer term there will be the need to develop a shorebase at Staffin, which will be brought forward as a further application.</p> <p><u>Infrastructure Benefits</u></p> <p>Some visitors to the open day highlighted the benefit of plans going ahead to improving the local slip facilities so boats can get in and out at all times / tides. Comment was also made on the possibility of fishing vessels having a safer haven further north for use on the site.</p> <p><u>Response</u> – whilst the interest in infrastructure improvements related to the development of the fish farms is noted there are unlikely to be further developments, nor the capital cost of improvements if fish farms are not approved.</p> <p><u>Impact on Seal Colonies, Sea Eagle Nesting and Nature in general.</u></p> <p>Some visitors sought additional information on the tracks of wildlife such as dolphins and birds.</p> <p><u>Response:</u> as part of the planning application process the applicant is required to consider the impact of development on features of nature conservation interest in the area. The specific species to be assessed</p>
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	<p>will be guided by the Local Authority and Scottish Natural Heritage under its biodiversity duty.</p> <p>The closest designated seal haul out is 9km to the East of the proposed sites at Loch a' Bhraighe at the north end of Rona. Advice has been sought from RSPB regarding Sea Eagles and Cetaceans will be considered during the consideration of the impacts of development on the Inner Hebrides and Minches candidate Special Area of Conservation (cSAC) for harbour porpoise.</p> <p>Impacts on seabed wildlife and habitats will be considered by SEPA during the determination of the CAR Licence application.</p> <p><u>Use of sea lice medicines</u></p> <p>Some attendees sought further information on the use of sea lice medicines on the site, and further information is required about the chemicals which may be used.</p> <p><u>Response:</u> – All chemicals used on site are permitted for use in the aquatic environment and will have been licenced for such use by SEPA. All medicine use will be licenced veterinary treatments used under veterinary supervision. The use of medicines is modelled by and licenced by SEPA so is not an issue for planning to consider, although SEPA will advise the planning authority during the determination process.</p> <p>Details of the medicines licenced for use are available within the SEPA fish farming manual on the SEPA website.</p> <p><u>Directors commitment to not selling the company</u></p> <p>Visitors sought guarantees that the development would not be sold on to other companies once permissions were granted.</p> <p>Response: The planning process looks at whether a development can take place at a location. Whom the operator is should not be a consideration for planning and as such is less relevant to the determination of an application. The directors cannot give any guarantees that the site will continue to be operated by OSH across its whole working life, and note that such guarantees could not be made by the directors of any other companies in relation their assets.</p>
Week of 13 <sup>th</sup> to 17 <sup>th</sup> February	Media coverage of Staffin Open Day on BBC ALBA, Radio Highland News and in West Highland Free Press.

# Fish farm proposals aim to bring jobs boost for north end of Skye

BY KEITH MACKENZIE  
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Developers are hoping fish farming at two north Skye sites can begin in April next year.

Directors from Organic Sea

Harvest were in Staffin last Friday to stage a public drop-in session outlining their plans for the sites at Culnacnoc and Invertote.

The firm are preparing a planning application which outlines their ambitions to harvest a maximum of

2,500 tonnes of salmon a year at each site, using wholly organic methods.

A steady stream of locals were there to view the plans and discuss them with the firm's directors Alex MacInnes, Robert Gray and Alister MacKinnon, along with Hugh

Drever, the UK chief operating officer for Villa Seafood, one of the leading companies in organic and sustainable fish farming.

With a year-round, well-paid employment in short supply in the region the firm's promise to create around seven jobs at each site would bring a welcome economic boost in a community where the local school roll has halved in the past decade.

However, the location of the sites around one of Skye's most scenic areas of coastline also brings concern.

Both the sites under current consideration will include 12 120 metre cages along with a feed barge. The company say they have worked to minimise any visual impact from the popular viewpoint at Lealt Falls, while the farms would not be seen from Kilt Rock.

Last Friday's event suggested more opposition could be forthcoming when planning permission is sought for further sites at Solitote and Flodigarry – areas the company has earmarked for future development.

While the current focus is on the two sites at Staffin, directors said they would need to secure at least one further site in order to fulfil the project's potential.

The fish farm sites would be accessed from the Staffin slipway, and the company also wants to process the farmed fish locally – potentially creating a further 25 jobs.

The farmed salmon will carry a premium price, but the OSH directors are confident that the organic mark – allied to the link with Skye – will secure strong demand for the product.

Once commonplace on the west coast, there are now very few organic sea farms in Scotland. They are classified as organic because of the lower capacity of fish and the diet fed to them.

Organic Sea Harvest estimate that each site will require an investment of around £3.5 million, which they aim to secure through a mixture of private and public sources.

They have pledged that the local community will stand to benefit through jobs and a fund levied from either company profits or fish sold.



14/03/17	Written pre-application advice received from The Highland Council for both sites.
March / April 2017	Ongoing discussions with Defence Infrastructure Organisation on behalf of MOD in relation to sites. Collation of information on aspects of the developments to inform preparation of applications.  Attend meeting of Skye Salmonid Management Group, convened by Skye District Fishery Board and attended by managers from, Kames, Greig Seafoods, Marine Harvest. Exchange of information on fish farming issues of interest to the Board and Trust. OSH to become members of the group if permissions are granted.
15 <sup>th</sup> May 2017	EIA scoping applications submitted for sites at Invertote, Culnacnoc, Flodigarry and Balmacqueen, under the Town and Country Planning (Environmental Impact Assessment Regulations) (Scotland) Regulations 2011.
19th May 2017	Community update note issued to Staffin Community Trust for distribution via its mailing list. Update included explanation of why all

	four sites had been scoped at this time and that additional open day(s) would be held for north sites in future. Update note attached at the end of this document.
4 <sup>th</sup> June 2017	Made aware that there was a posting on Kilmuir, Isle of Skye Facebook Page noting that planning permissions had been submitted for sites off Flodigarry and Balmacqueen and noting reference numbers.
9 <sup>th</sup> June 2017	Brief meeting with SNH in Portree to discuss aspects of Scoping Applications
13 <sup>th</sup> June 2017	Made aware that objections to “planning applications” had been sent to statutory bodies in relation to the north sites. Some of the grounds for objection were based on aspects which OSH had not yet been asked to assess. OSH asked that objections be removed from public view as there was no public consultation on Scoping applications.
19 <sup>th</sup> June 2017	<p>EIA Scoping responses received from THC. Potentially significant impacts Scoped as</p> <p><b><u>Benthic Impacts</u></b> resulting from the seabed deposition of fish waste and uneaten feed.</p> <p><b><u>Impacts on wild salmonids</u></b> through discharges of sea lice and the possibility of fish escapes from the site.</p> <p><b><u>Landscape impacts</u></b> of the site will have to be assessed by a Landscape and Visual Impact Assessment (LVIA). This assessment should include an assessment of the noise from the site.</p> <p><b><u>Cultural Heritage impacts</u></b> on the setting of various sites as outlined in the accompanying template should be considered within the LVIA.</p>
June to October 2017	Ongoing site visits collation of information and background analysis including discussion and information exchange with RSPB and local wildlife observer. Analysis of activity at viewpoints including discussions with members of the public, visiting taxi drivers etc. Site visits to the Storr.
October 2017	Planning applications submitted. Pre-application phase over





## Proposed Organic Salmon Farms Invertote and Culnacnoc Trotternish, Isle of Skye

### Who Are Organic Sea Harvest?:

A Scottish Highlands based company, Organic Sea Harvest Ltd. (OSH) is a new business set up with the purpose of producing Scottish Grown Organic Salmon and Sea Trout.

Organic salmonid production in Scotland is in decline and OSH, has identified significant market demand for organic product.

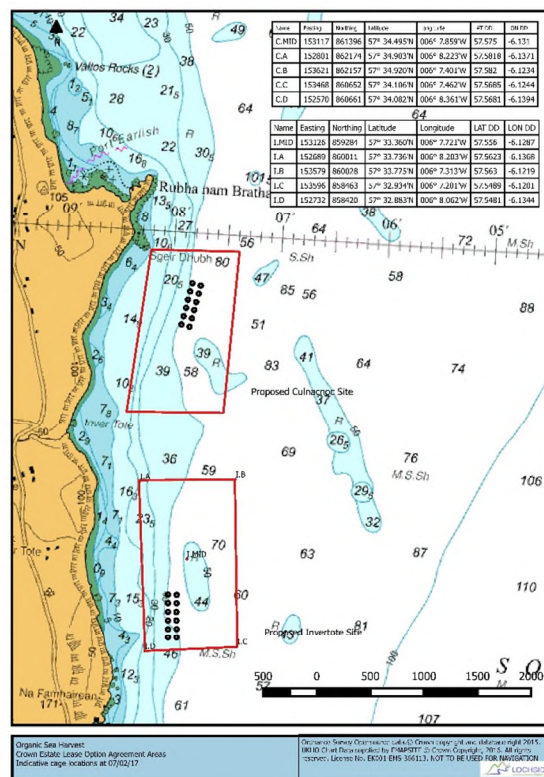
OSH intends to accredit all farms as follows:

- Soil Association UK 5 standards
- RSPCA Farm Assured Standards
- Code of Good Practice (CoGP)
- Accreditations at customer request

### Farm Locations:

Organic Sea Harvest seek to operate a minimum of four farms, each of 2,500T consent.

The Southern sites, identified as Culnacnoc and Invertote are the farthest advanced in terms of preliminary investigations.



### Farming Infrastructure:

Suppliers are currently being sought for cage, feed barges and associated equipment.

The preferred cage layout is currently 12 x 120m circumference plastic circular cages, moored in a 6 x 2 configuration in a 80m x 80m mooring grid.

Final specifications for all equipment will be determined by the suppliers/manufacturers following detailed site survey in accordance with "A Technical Standard for Scottish Finfish

Aquaculture" (STS) published by Marine Scotland. All equipment used will be compliant with this standard.

### Site Servicing:

Organic Sea Harvest intend to service the site by workboat from Staffin Jetty, with smolt supplies coming initially from the hatchery at Gairloch.

### Fish Health & Welfare:

Fish health & welfare will be managed by Fish Vet Group (FVG) based in Inverness. With a dedicated fish vet overseeing fish welfare on site. FVG will be involved in all aspects of fish husbandry.

### Sea Lice Strategy:

OSH acknowledges at the outset that Sea Lice remain a key challenge within the Scottish and global fish farming industries.

Sea lice control is possible through careful site management including reduced stocking densities the use of licensed veterinary medicines and cleaner fish. Novel approaches and emerging technologies are also under investigation by the company.

OSH anticipates operating in accordance with an Environmental Management Plan augmenting its own fish health management plan. This will also be key to meeting the requirements of the Organic standard.

### Environmental Impacts:

Sites will be subject to Environmental Impact Assessment under the Town and Country Planning (Environmental Impact Assessment Regulations) (Scotland) 2011 as such, an Environmental Statement (Environmental Impact Assessment Report). It is anticipated that planning application and supporting information will be prepared to consider, in detail the following aspects of the development.

### Socioeconomic Impacts

The developments will result in a significant number of new jobs for the Staffin Area, the socioeconomic impacts of the developments will be assessed taking into account impacts on other existing activities.

### Benthic Impacts

Preliminary current monitoring and sea bed video surveys have been undertaken for the Culnacnoc site, this and grab samples for both sites indicate a mud seabed.

### Water Column Impacts

OSH are required to model the water column impacts including nutrient enhancement to inform SEPAs CAR licensing process.

### Interaction with Predators

Top nets will discourage predation by birds. A full predator management plan will be provided in support of the final application. OSH does not intend to seek a licence to shoot seals.

### Impact on wild salmonids:

Impact on wild salmonids may occur through escapes and sea lice. Fish containment will be considered as part of the site management plans and sea lice will be considered under the sea lice strategy.

### Impacts upon species or habitats of conservation importance, including Sensitive Sites:

There are not known to be any Priority Marine Features (PMFs) present on the sites but these will be considered if they are found during surveys.

### Navigation, Anchorage, Commercial Fisheries, other non-recreational maritime uses (MOD)

There are no marked anchorages within the site area. The Northern Lighthouse Board has advised that sites be marked with 2 lit marker poles Fl(4) Y 12s) with an all-round fixed white light on the feed barge

Navigational impacts will be considered by Marine Scotland during the determination of the Marine Licence.

### Commercial Fishing:

The impacts of the development on commercial fishing interest will be considered in final plans.

### Landscape / Seascape / Visual Impacts.

The sites lie close to a National Scenic Area and within a Special Landscape Area. Preliminary investigations have been carried to assess the

landscape and visual impacts of the developments from several key viewpoints. The sites have been chosen to reduce the locations at which they will be visible in views, noise and light impacts from these locations will also be considered.

### Other considerations

Further investigations will be undertaken as required by Scottish Planning Policy and Scotland's Marine Plan, these will include:

- Marine Cultural Heritage / Archaeology
- Waste Management
- Access and Recreation
- Traffic and Transport

### Feedback

We hope that you have found today's event of interest. We welcome your views on the proposals as outlined.

Please provide feedback by completing our questionnaire and leaving it at the event or you can comment by email: [info@loch-side.co.uk](mailto:info@loch-side.co.uk)

Information provided will be used to shape the proposals. Comments may be used in final documents but will not be attributable.

Your personal information will only be used for purpose outlined above and will not be passed on to third parties.

All information presented is correct at date of printing.





## Feedback Form

1. Have you found today's event useful? (Y/N) .....
2. How could we improve on our presentation?  
Would any other information have been helpful at this event?  
.....  
.....  
.....
3. Having seen the information today, can you suggest anything else  
that we need to consider?  
.....  
.....  
.....
4. What is your main area of interest or concern?  
.....  
.....  
.....
5. Do you have any comments on the proposals?  
.....  
.....  
.....
6. Do you wish to be kept informed as the proposals go through the planning process? (Y/N)  
*If so, please leave your name and contact details below.* .....  
*Please note: your personal information will only be used for the purpose outlined above  
and will not be passed on to any third parties.*

Name ..... Email .....

Address .....

Phone.....

***Thank you for your input.***



Proposed Organic Salmon Farms  
Invertote and Culnacnoc  
Trotternish, Isle of Skye

Report of Public Drop in Session 10<sup>th</sup> February 2017  
Staffin Community Hall.

On the 10<sup>th</sup> February Organic Sea Harvest Ltd. held a public drop in session at Staffin Community Hall. The intention of the open day was to provide information to local residents and stakeholders on the company's proposals for Organic Fish Farms at Invertote and Culnacnoc.

The open day was attended by around 60 people over the course of 12 hours. Attendees showed interest in the display boards, video presentations and a significant number took the opportunity to discuss proposals with the OSH board members present.

Attendees were given the opportunity to complete a feedback form and a record was also retained of the questions being asked and the points being raised during discussions. The following provides a summary of the main issues raised.

1. Economic Benefit

There was a general recognition of the potential for economic benefit to the area because of the development of fish farms and the jobs, both direct and downstream that would accrue from the proposed development. This included, but was not limited to, interest in working on the sites and job vacancies. It was noted that any jobs created should be new jobs rather than displacement of employment from one sector to another.

2. Landscape, Visual Impact, Noise, Light and Associated Impact on Tourism Activities

The main area of concern expressed by visitors was in relation to the impact of development on tourism to the area. It was highlighted that the Coastal footpaths were a key draw to the area and it was felt that the proposed developments would impact on the number of visitors using the paths. In addition it was noted that in general the scenery surrounding the site was important to the visitor numbers to the area. Some visitors highlighted the importance of the track to The Brothers headland (Rubha nam Brathairaeen) north of the proposed Culnacnoc site although some noted that the majority of those visiting would tend to seek views to the North up the coast towards Kilt Rock.

3. Impact on Wild Salmonids (Sea Lice / escapes / use of sea lice medicines)

Several of the comments related to the type of net to be used on the sites and the extent to which these would contain the fish. Examples of net materials were available on display. The use of sea lice medicines was also discussed at some length by

attendees of the open day. It was stressed that all medicines used would be used under veterinary supervision and that although applications would be made to SEPA for the full suite of medicines OSH pointed out that it envisaged the use of greatly reduced fish stocking densities together with timeous use of emerging non-medicinal treatments under the supervision of a dedicated veterinary specialist would serve to reduce the risk of high sea lice numbers and impacts on wild salmonids.

4. Impact on Commercial Fishing

The open day was attended by a fishermens representative who highlighted that the proposed developments, in particular Culnacnoc were co-incident with an area used for prawn trawling. OSH agreed to investigate the microsites of moorings once cage specifications and required moorings extents had been established by the company.

5. Impact on Residential Properties

A small number of attendees were interested whether the sites would be visible from their property. Contact details were retained and further investigation from these locations will be carried out in due course.

6. Plans for North Sites

Some visitors expressed surprise that there was no information about plans for the Northern Sites. The open day had been advertised for Invertoe and Culnacnoc only and there will be further event for the North Sites following further site investigations.

7. Organic Status of Sites

Additional questions were raised regarding the Organic Standards. OSH explained that farming would be undertaken within the Organic standard for Fish Farming set by The Soil Association, which is the recognised standard. Copies of the standard were available to view and are available to download from the Soil Association web site.

Note prepared: 17/02/2017

Jim Bromham, Lochside Associates

For Organic Sea Harvest Ltd.



## Proposed Organic Salmon Farms Trotternish, Isle of Skye

### Update Report May 2017

Following the open day in Staffin on 10<sup>th</sup> February 2017 and feedback received from Statutory consultees during March 2017, work has been progressing with site investigations and information gathering to inform the final planning applications and supporting environmental statements for the southern sites at Invertote and Culnacnoc.

The proposed developments will require to be assessed under the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2011. There are normally two stages in determining the extent of an Environmental Impact Assessment. The first is screening, in which the planning authority decide whether an environmental statement is required. The second stage is scoping during which the planning authority determines the extent of the assessment required in the ES. As OSH is looking to develop new sites, it is of the view that Environmental Impact Assessment will be required and has proceeded direct to the scoping process.

OSH has now submitted applications for “Scoping Opinions” to the Highland Council. These were registered on 15<sup>th</sup> May 2017 and the Council has a target date of 19<sup>th</sup> June by which to issue its opinions.

OSH immediate priority is for scoping decisions on the southern sites at Culnacnoc and Invertote and it remains the case that all future proposals in the area by OSH are dependent on the successful operation of these two sites. OSH has taken the opportunity to also seek scoping opinions for potential northern sites. It remains OSH intention to undertake pre-application session(s) for the north sites as proposals progress. It is currently envisaged that these will be of a similar format to the session in Staffin earlier in the year.

The information submitted for each site is available to view on the Highland Council e-planning portal on [wam.highland.gov.uk](http://wam.highland.gov.uk) using the following reference numbers as the search terms:

Culnacnoc	17/02310/SCOP
Invertote	17/02312/SCOP
Balmacqueen	17/02313/SCOP
Flodigary	17/02314/SCOP

Once consultation advice is received from statutory consultees this will also be visible at the same location as will any other information that OSH provide at the request of the Council during the process. Although the information on the e-planning portal is in the public domain this stage of the process is not a public consultation. Full public consultation will take place once the final planning applications have been submitted.