

Application for Marine Licence (Shellfish Farm) O Kilbride. 27.3.2026

Appendix 1. Consideration of Scotland National Marine plan

In relation to this application for a Marine Licence for a Shellfish Farm , I have considered ‘**Scotland’s National Marine Plan**’, specifically the relevant policies copied below

Marine planning policies;

*“**AQUACULTURE 1.** Marine planners and decision makers should seek to identify appropriate locations for future aquaculture development and use, including the potential use of development planning briefs as appropriate. System carrying capacity (at the scale of a water body or loch system) should be a key consideration”*

*“**AQUACULTURE 2:** Marine and terrestrial development plans should jointly identify areas which are potentially suitable and sensitive areas which are unlikely to be appropriate for such development, reflecting Scottish Planning Policy and any Scottish Government guidance on the issue...”*

Therefore, in considering this application I have referred to; **The ‘Loch Torridon Aquaculture Framework Plan’** (produced by the Highland council in May 2011), and copied relevant sections below

Hydrography

27. The Loch Torridon system is fjordic in character, 22 kms long overall and has three main basins. The deepest section is the outer loch which reaches a depth of 145 metres. Loch Shieldaig and the upper loch have maximum depths of 119 and 88 metres respectively.

28. The outer loch can be described as an enclosed bay with strong currents rapidly flushing the basin. However, a deep sill does exist near the mouth at a depth of 64 metres. Another deep sill, at 79 metres, lies between the outer loch and Loch Shieldaig.

Future Prospects for Aquaculture Development

33.Prospects for expansion may be somewhat better in the less sensitive outer loch but here exposure is more of a consideration and more robust types of installation would be required.

35. While some further expansion of shellfish farming in Loch Torridon is possible there are limited opportunities for additional finfish farms within the system...

41. With regard to shellfish developments, there are a limited number of sites within the plan area which may be suitable for the longline or raft culture of mussels. These locations are identified in the area policies and policy map. The use of subsurface longlines would result in reduced surface gear and therefore less visual impact.

Water quality

55. Aquaculture itself can sometimes have an adverse effect on surrounding waters. In the case of shellfish farming the inputs into the water column are usually minimal since no additional feed is required to grow shellfish. However, where very large scale shellfish farms are proposed, there may be both benthic and water

column impacts which need to be considered. As farmed shellfish are net consumers of nutrients from the water column at high stocking densities, this may lead to less nutrients being available for other 60. Live shellfish put on the market must by law meet strict criteria in terms of hygiene. Shellfish production areas are classified for this purpose according to the presence in water and shellfish samples of certain types of bacteria. Harvesting classifications are species and area-specific and may be seasonal. In Highland harvesting areas are normally classified as category 'A' or 'B'. Shellfish landed from areas classed as category 'A' can go direct to market for human consumption provided they meet the specified end-product standards. There is no legal requirement for any processing other than washing. When the classification is 'B', mussels must be either depurated, heat treated, or re-laid in an area having an 'A' classification in order to meet the category 'A' requirements and the end-product standards. These classifications are subject to ongoing monitoring carried out by the Food Standards Agency (Scotland) (FSAS) and they are published annually. The endproduct standards are listed on the agency's web site (www.food.gov.uk).

61. Upper Loch Torridon is afforded additional protection from deteriorating water quality by virtue of being designated as 'Shellfish Growing Waters' under the European Community Shellfish Waters Directive (79/923/EEC). These waters are protected to ensure the quality and productivity of shellfish and must meet the minimum environmental quality standards laid out in the Directive. Water quality monitoring under the Shellfish Waters Directive is carried out by SEPA and further information can be found on its web site (www.sepa.gov.uk).

62. In the siting of shellfish farms in particular, it is important that developments are not close to any significant effluent discharges, including the discharge from septic tanks. For any application involving the siting of a marine fish farm, the Council consults Scottish Water and SEPA for their expert advice in this regard. marine life in the vicinity

63. Shellfish production can sometimes be affected by the presence in the water column of certain harmful but naturally occurring algae. When these algae occur in high concentrations they can cause the accumulation of toxic compounds within filter-feeding bivalves. This can lead to fisheries and aquaculture operations being temporarily suspended on public health grounds. Closures of this nature, to avoid any risk of Paralytic, Amnesic, or Diarrhetic Shellfish Poisoning, are not uncommon in Scottish waters during the summer months. Monitoring for toxins in shellfish and for the specific algae causing them is the responsibility of the Food Standards Agency, which sub-contracts this work to an accredited laboratory. If a temporary closure is necessary, FSAS contacts the Highland Council Environmental Health Officer for the area. The officer must then inform the grower or harvester and put up notices to inform the general public not to gather shellfish from the area.

Predator Control and Interactions with Other Species

72. Shellfish farms do not normally suffer from attacks from mammals but mussel farms in particular may be susceptible to losses from predatory birds such as eider ducks. These diving ducks can strip large quantities of mussels from the dropper ropes suspended below longlines or rafts. Again predator deterrents may be required to reduce losses to the farmer. These may take the form of anti-predator nets placed around rafts or groups of longlines although this can prove expensive and may on occasion result in entrapment of diving birds. Alternative methods involve the use of scarecrows or gas cannon to scare off the birds. These methods may however also have adverse landscape and noise impacts. One of the most effective ways of controlling eider duck impacts is to ensure a regular human presence on the site. Whilst recognising the adverse economic impact which sea birds such as eider ducks may have on shellfish farms, the Council favours non-destructive and low-impact methods of predator control.

73. Starfish may also be active predators on shellfish farms, feeding on mussels dislodged from longlines and settling on the seabed. Losses can be minimised by ensuring that the dropper ropes cannot make contact with the seabed. Lines should therefore be located in sufficient depth of water and have sufficient buoyancy to keep the shellfish farm afloat.

Landscape and visual amenity

93. The above considerations also apply to the installation of floatation gear for shellfish longlines, which should be in dark matt colours. Further useful information on the siting and design of aquaculture installations is contained in the SNH publication “Marine Aquaculture and the Landscape”. At the time of writing, this guidance was being revised and due for publication in 2011.

Strategy and introduction to area Policies.

115. The strategy: supports continued finfish and shellfish farming activity in the areas currently used for this purpose, on the understanding that operators give due regard to the environmental sensitivity of the loch and its coastline, the needs of local residents and to other interests in the area;

Area I: Outer Loch Torridon (south side) (Rubha na Feàrna to Rubha Glas) *Inc. Faingmore bay.*

Characteristics/constraints

149. The south side of the outer loch is characterised by a series of small north-facing bays backed by undulating moorland. Remote and sparsely settled, with an open outlook to the uninhabited shore opposite, this area is accessible only by single-track road. However, this section of coast is sheltered from the prevailing westerly and south-westerly winds and the waters are well flushed. The main fetch across open water is to the north. The scattering of small hamlets here i.e. Fearnmore, Fearnbeg and Arinacrinachd, are set back slightly from the coast and looking across the outer loch they enjoy good open views of the peaks of Shieldaig Forest.

150. Whilst there are opportunities for small-scale shellfish farm development which have already largely been taken up, the visual amenity of these hamlets should be safeguarded. This tends to preclude medium to large-scale development other than along the low-visibility section of coast between Rubh’ a’ Chamais Ruaidh and Sgeir Dhubh. Although the road is narrow, it is well used in summer by tourists doing the circuit of the Applecross peninsula.

Area policy

151. General presumption in favour of small-scale shellfish farming along this coast and small to medium scale shellfish or finfish development in the section between Rubh’ a’ Chamais Ruaidh and Sgeir Dhubh. The siting and operation of aquaculture installations should respect visual amenity and the outlook from the small settlements along this coast.

Marine planning policies; (National Marine Plan)

“AQUACULTURE 4: There is a presumption that further sustainable expansion of shellfish farms should be located in designated shellfish waters if these have sufficient capacity to support such development.”

Outer loch Torridon was previously designated shellfish waters, although the area is not currently designated

“AQUACULTURE 10: Operators should carry out pre-application discussion and consultation, and engage with local communities and others who may be affected, to identify and, where possible, address any concerns in advance of submitting an application”

I have therefor carried out a consultation with the local fishing fleet and marine stakeholders, and have designed the development to minimise the risk to other marine users.

“AQUACULTURE 13: Proposals that contribute to the diversification of farmed species will be supported, subject to other objectives and policies being satisfied”

Although Scallop farming, (which forms part of the proposed development) has yet to take off in Scotland, it is a major industry in other countries, and has considerable potential to add to the Scottish aquaculture industry

The following sections on the National Marine plan could be considered to support the proposed development.

“Part 3: Key issues for marine planning

SUPPORTING ECONOMICALLY PRODUCTIVE ACTIVITIES

7.5 Aquaculture contributes to sustainable economic growth in rural and coastal communities, especially in the Highlands and Islands. Many communities depend on the employment and revenue it provides and, as a growing industry, it has potential to contribute to future community cohesion by providing quality jobs in rural areas and helping to maintain community infrastructures such as schools, ferries and other services

7.9 There is significant scope for growth in Scotland’s shellfish industry, particularly mussels and oysters⁸³. The shellfish industry predominantly comprises of small-scale operations, with a large number of small farms and many part-time farmers, although there are larger operations in Shetland, the Western Isles and at Loch Fyne.

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*7.10 Other opportunities to grow and diversify the sector include:
Pursuing prospects and opportunities for growth of other shellfish sectors, trout and other finfish species such as halibut..”*