

## Appendix 2: Fassfern mussels Consideration of Scotland's National Marine Plan

<p><b>REC &amp; TOURISM 2:</b> The following key factors should be taken into account when deciding on uses of the marine environment and the potential impact on recreation and tourism:</p> <ul style="list-style-type: none"><li>• The extent to which the proposal is likely to adversely affect the qualities important to recreational users, including the extent to which proposals may interfere with the physical infrastructure that underpins a recreational activity.</li><li>• The extent to which any proposal interferes with access to and along the shore, to the water, use of the resource for recreation or tourism purposes and existing navigational routes or navigational safety.</li></ul>	<p>The main recreation and tourism activity undertaken in Loch na Droma Buidhe is as an anchorage for yachts and leisure craft. In order to reduce any impact on other users the following have been considered.</p> <ul style="list-style-type: none"><li>• Fassfern Mussels acknowledges that there is potential for impact on the use of Loch na Droma Buidhe as an anchorage. In order to minimise any potential impact we have:<ul style="list-style-type: none"><li>▪ Carefully designed the scale, layout and location of the proposed site.</li><li>▪ For the planning application associated with this Marine Licence application we contacted several organisations with yachting interests within Loch na Droma Buidhe (WHAM, CCC and RHYC) and as a result of our discussions with them, have revised our initial design:<ul style="list-style-type: none"><li>○ We have reduced the proposed number of longlines from 6 to 5,</li><li>○ We have moved the inshore longline an additional 50m to the north and 70 m to the west. The longlines are now proposed to be a minimum of 150m off the shore at chart datum.</li><li>○ The overall area of the development has been reduced by reducing the spacing between the longlines from 30m to 25m.</li><li>○ This overall results in a 33% decrease in the size of the proposed development.</li></ul></li><li>▪ Equipment design: All the equipment, except marking equipment which will be dictated by NLB, will be grey in colour to help reduce the visual impact.</li><li>▪ As the longlines are constructed from rope and plastic floatation buoys there will not be any issues of noise, therefore the tranquil quality of the area will not be spoiled.</li><li>▪ As mussels are filter feeders and do not require daily feeding from a boat, and do not require chemical or medical treatments, the activity to service the site is very low. The site will take one week to install and in subsequent years the spat catching medium will be deployed over one week in spring/ early summer and the spat will be removed over five days the following January / February . Outwith these two periods, the site will be visited weekly to check all is in order. The level of disruption to those enjoying this location will therefore be minimal. The two periods of most activity will take place outwith the main sailing season.</li><li>▪ There are also numerous suitable anchorages in close proximity to Loch na Droma Buidhe for use in the event of a bad weather.</li></ul></li></ul>
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	<ul style="list-style-type: none"> <li>• As the development will be a minimum of 150m from the shore in all directions and there will be no shore based facilities here there will be no interference with access to and along the shore for other users of the area.</li> <li>• Whilst the development will occupy a small area of the loch, the careful siting of the development should reduce the potential impact on other loch users. <ul style="list-style-type: none"> <li>▪ The area of deeper water to the north of the loch will still be available for creel fishing.</li> <li>▪ The siting of the longlines in the slightly deeper water off the shore allows visiting yachts to anchor in the shallower water to the south and east of the proposed site.</li> </ul> </li> <li>• The NLB have been contacted for a provisional consultation and do not foresee the proposed location having navigational issues. The site will be marked as directed by the NLB for navigation safety.</li> <li>• There are also numerous suitable anchorages in close proximity to Loch na Droma Buidhe for use in the event of a bad weather.</li> </ul>
<p><b>FISHERIES 2:</b> The following key factors should be taken into account when deciding on uses of the marine environment and the potential impact on fishing:</p> <ul style="list-style-type: none"> <li>• The cultural and economic importance of fishing, in particular to vulnerable coastal communities.</li> <li>• The potential impact (positive and negative) of marine developments on the sustainability of fish and shellfish stocks and resultant fishing opportunities in any given area.</li> <li>• The environmental impact on fishing grounds (such as nursery, spawning areas), commercially fished species, habitats and species more generally.</li> <li>• The potential effect of displacement on: fish stocks; the wider environment; use of fuel; socio-economic costs to fishers and their communities and other marine users.</li> </ul>	<p>There is some creel fishing activity carried out in Loch na Droma Buidhe.</p> <ul style="list-style-type: none"> <li>• As a small local business Fassfern Mussels appreciate the importance of fishing to rural coastal communities. For the planning application associated with this Marine Licence application discussions have been undertaken with local fishermen during which Loch na Droma Buidhe was suggested as a suitable location with regards to reducing the potential impact on fishing in this locality.</li> <li>• Whilst the installation of a shellfish farm will prevent access for fishing in the immediate vicinity of the proposed site, the area which is being proposed has been chosen very carefully in order to allow access to as much of the remaining area of the loch as possible. By locating this in the south east it allows the deeper water in the middle of the loch to be accessed by local fishermen.</li> <li>• Suspended mussel culture increases biodiversity in and around the area in which the ropes are suspended.</li> <li>• The nature of growing mussels means that it not necessary to visit each site daily. The site will be installed over a approximately 5 days, then typically there will be one week in spring / early summer to install the spat catching medium and five to six days in January / February to remove the seed mussels. As mussels get their food from the water and require no medical treatments there is no need for daily activity at a shellfish farm so typical activity for this as a spat / seed mussel site would only require one visit per week to check the site and equipment were in order. As a result the amount of fuel used annually for a site such as</li> </ul>

	<p>this is not significant.</p> <ul style="list-style-type: none"> <li>• The location has been discussed with NLB with regard to navigational safety in the area and has been deemed suitable. Site marking would be advised in the planning and marine licence application processes.</li> <li>• This development will support the existing local full time and seasonal jobs the business has already created as well as supporting employment nationally through membership of the Scottish Shellfish Marketing Group in Bellshill. It will also contribute to the local economy through the purchasing of necessary supplies and the use of support services.</li> </ul>
<p><b>Aquaculture</b>  Objectives and policies for this sector should be read subject to those set out in Annex B and Chapter 4 of this Plan. It is recognised that not all of the objectives can necessarily be achieved directly through the marine planning system, but they are considered important context for planning and decision making.  Part 1: Objectives and marine planning policies  Objectives  1 An aquaculture industry that is sustainable, diverse, competitive economically viable and which contributes to food security whilst minimising environmental impact.  2 With due regard to the marine environment and carrying capacity, support for the industry's target to grow marine finfish (including farmed Atlantic salmon) production sustainably to 210,000 tonnes; and shellfish, particularly mussels, to 13,000 tonnes sustainably by 2020.  4 Quality employment and sustainable economic activity in remote and rural areas, as well as more widely in Scotland.  Marine planning policies  AQUACULTURE 4: There is a presumption that further sustainable expansion of shellfish farms should be</p>	<p>This development would contribute to the objectives and policies of the Scottish National Marine Plan in the following ways.</p> <ul style="list-style-type: none"> <li>• It will help to grow the aquaculture industry, increasing it in a sustainable and economically viable way. It will also contribute to food security in an environmentally sound way.</li> <li>• It will help to increase Scottish production of mussels towards the proposed targets.</li> <li>• It will sustain quality employment both locally and nationally, through the purchases and services utilised by the business and its membership of the Scottish Shellfish Marketing Group.</li> <li>• The proposed site is not within Designated Shellfish Growing Waters as there are no Shellfish Growing Water designations in Loch Sunart. Fassfern Mussels already operate 3 small shellfish growing sites within Loch Sunart and have done so since 2011. The water quality in Loch Sunart is suitable for shellfish growing as it is very high and has no significant population centres or industries surrounding the loch.</li> <li>• Considerable thought has gone into selecting this as a potential shellfish site. The location is within a marine SAC and a Marine Protection Area, however, through existing records and a seabed survey it has been established that there are no protected species or Priority marine features present in the proposed location.</li> <li>• The visual impact is being addressed through: <ul style="list-style-type: none"> <li>▪ Equipment design: All the equipment, except marking equipment which will be dictated by NLB, will be grey in colour,</li> <li>▪ The equipment is low in the water ,</li> <li>▪ The people living in the one house overlooking the site have no objection to the proposal.</li> <li>▪ The proposed configuration meets the siting recommendations set out by Nature Scot. <ul style="list-style-type: none"> <li>○ All equipment is of similar colour (grey),</li> </ul> </li> </ul> </li> </ul>

located in designated shellfish waters [74] if these have sufficient capacity to support such development.

AQUACULTURE 5: Aquaculture developments should avoid and/or mitigate adverse impacts upon the seascape, landscape and visual amenity of an area, following SNH guidance [75] on the siting and design of aquaculture.

AQUACULTURE 6: New aquaculture sites should not bridge Disease Management Areas [76] although boundaries may be revised by Marine Scotland to take account of any changes in fish farm location, subject to the continued management of risk.

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.

AQUACULTURE 11: Aquaculture equipment, including but not limited to installations, facilities, moorings, pens and nets must be fit for purpose for the site conditions, subject to future climate change. Any statutory technical standard must be adhered to. Equipment and activities should be optimised in order to reduce greenhouse gas emissions.

- All floatation buoys will be the same type and size,
- Spacing between lines is consistent.
- It follows the line of the shore,
- The scale against the shore is appropriate (it would occupy less than one fifth of the length of the south shore),
- Being sited against a backdrop of the hills.

As a result, the visual impacts of the development should be minimal.

- Fassfern Mussels have implemented a Biosecurity Plan as part of the conditions of their operating permission from Marine Scotland. Adherence to this plan is checked regularly during Marine Scotland visits to Fassfern Mussels sites.
- Extensive discussions have been undertaken prior to the preparation of the planning application associated with this Marine Licence application. Fassfern Mussels have been in communication with :
  - Local fishermen on Mull and Loch Sunart,
  - The people living in the house overlooking the site.
  - Nature Scot.
  - Northern Lighthouse Board.
  - West Highland Anchorage and Mooring Association,
  - Clyde Cruising Club.
  - Royal Highland Yacht Club.
  - Highland Council Planning.

As a result of these discussions, the initial proposal has been amended in an aim to meet the needs of all other loch users.

- All of the equipment utilised in this development will be standard aquaculture equipment as used at our other sites.
- Visits to and activities on the site will be carried out as efficiently as possible.