



Muckairn House, Taynuilt, PA35 1JA
enquiries@lochetive.org
www.lochetive.org

FRIENDS OF LOCH ETIVE OBJECT TO HUGE DAWNFRESH EXPANSION AT PORT NA MINE (ETIVE 3) FISH-FARM

Friends of Loch Etive objects to the planning application made by Dawnfresh to increase massively the size and tonnage of the existing Port Na Mine (Etive 3) fish-farm, increasing the size of the existing cages and placing of six new cages and a permanently moored feed barge at the site.

This will increase the tonnage of fish from 458 tonnes to 2500 tonnes – **a 500% increase**.

With that comes much more pollution of the sea-bed of Loch Etive, the threat of even greater numbers of escaped rainbow trout as well as the noise of the blowers and floating pipes carrying pelleted food from the feed barge to the cages.

Yet again, this expansion runs counter to the Loch Etive Integrated Coastal Zone Management (ICZM) Plan drawn up after extensive consultation with all the Etive communities.

Unique Loch Etive

Loch Etive is, of course, not a typical seawater loch. It is brackish and the upper basin of the loch, within which the Port Na Mine fish-farm is located, has unique characteristics. The upper part of Loch Etive is prone to lack of oxygen in the water (anoxia), due to a long flushing time and the nature of the seabed. Loch Etive is considered to be the sea-loch most prone to lack of oxygen on the whole west coast.

The expansion of Port Na Mine will involve a considerable increase in the discharge of organic matter (waste food and faeces) into the water column and onto the sea-bed.

The Loch Etive ICZM Plan says that *“limited water exchange in this policy zone may restrict aquaculture development in terms of availability of plankton for shellfish and flushing of excess wastes/nutrients from fin fish farming”*. It also says that *“any proposal to significantly increase trout farming in this policy zone should consider whether the increase nutrient and waste input would exacerbate naturally occurring low dissolved oxygen levels”*.

FoLE is far from convinced that Dawnfresh has taken into account the unique nature of Loch Etive.

More industrialisation of the loch

The ICZM Plan has a presumption against new aquaculture development in this part of Loch Etive and the only scope for maximising trout production is via consolidation and rationalisation of existing sites.

The recent removal this year of the farm at Inverawe West (Etive 1) was in mitigation for planning permission granted earlier this year for Etive 6, at Sailean Ruadh, in order to provide for what the Council considers to be sufficient landscape mitigation for that huge new farm.

That grant of planning permission at Etive 6 is still subject to judicial review proceedings brought by FoLE and that case will be heard in the Court of Session in February next year.

What is important for this new application is that the removal of Inverawe West fish farm (Etive 1) has not, in any way, ‘made room’ for this proposed expansion at Port Na Mine. The Council must not ‘double count’ the effect of the removal of Inverawe West (Etive 1).

Nor can the expansion proposed at Port Na Mine (Etive 3) be mitigated for by the demise of two defunct mussel operations on the north coast of upper Loch Etive. By any reasonable yardstick, the six new fish-farm cages, enlarged existing cages and permanently moored feed barge, constitute a massive increase in the overall landscape impact of aquaculture in this part of Loch Etive.

FoLE believes that the only way to allow any expansion at Port Na Mine (Etive 3), to keep the application even vaguely in line with the ICZM Plan, would be the complete and permanent removal of Dawnfresh's existing fish-farm at Inverawe East (Etive 2), moving the current production at Inverawe East (Etive 2) to the Port Na Mine (Etive 3) site.

This would make use of the wooded backdrop to the farm at Port Na Mine to minimise the landscape impact and would have the added advantage of relocating trout farming further from the mouth of the River Awe, lessening the damage to the reputation of that fishery that escaped farmed rainbow trout cause.

We urge you to object to this expansion

Go to <http://www.argyll-bute.gov.uk/planning-and-environment/find-and-comment-planning-applications>

Register on the site, search for application number 14/02249/MFF - Modification of existing fin fish farm site comprising 6 additional cages, addition of feed barge and increase of cage sizes from 70 metre circumference to 80 metre circumference and increase in extent of moorings - Port Na Mine Fish Farm (Etive 3), Inverawe, Taynuilt, Argyll.

See <http://publicaccess.argyll-bute.gov.uk/publicaccess/applicationDetails.do?activeTab=summary&keyVal=NC1RK8CHOCM00>

for information about the application Dawnfresh has submitted. Remember you must register first on the Council's Planning website and then log-in to object to this application on-line. Alternatively, just send an email to centralvalidationteam@argyll-bute.gov.uk, quoting the above planning reference.

Objections must be lodged by 19th November 2014 at the very latest so please spare a few moments to do it as soon as possible.

Please be sure to keep your objections to those matters the Council is permitted by law to take into account, such as:

- Visual appearance and landscape
- Environmental impact – water pollution, waste discharges and contamination of the sea-bed
- Impact on nature conservation (sea-trout, salmon, otters, seals, crabs, other crustaceans)
- Nuisances such as noise, smell, fumes, lights, interference in public right to navigate
- Adverse safety impact to recreational and other boat traffic
- Compatibility with existing uses e.g. fishing, tourism, nature conservation, recreational use of Etive
- Economic threat to other jobs

Items which are NOT usually material considerations and are therefore not relevant to planning include:

- Personal circumstances
- Private interests, e.g. competition between particular businesses
- Political considerations or ideological dislikes (e.g. any view that fish-farming is 'unethical' or just plain wrong)
- Any issues exclusively covered by other legislation, e.g. health and safety regulations as to safety of employees

We would be very grateful if you could copy your objections to us at FoLE at enquiries@lochetive.org.