

**Amended Scottish Salmon Company Planning Application for Millstone
Point, North Arran
19/00609/PPM**

So what can we do?

As members of the public, we only have until 9th November 2020 to submit our comments on the planning application. Please see below for guidance on how to respond and some suggested content in response to the amended application.

Ways to respond

There are two ways to respond to this planning application.

1. Online via the planning website, **which is recommended whenever possible. (see detailed instructions at the end of this document).**
2. In Writing: F.A.O Mr Iain Davies, Planning, North Ayrshire Council, Cunninghame House, Irvine, KA12 8EE

Amended North Arran Salmon Farm Key Objections

1 Why it is important to object again?

- The factory farm still relies on open cages which allow polluting emissions to flow freely and untreated into the sea.
- The revised application is for a reduced number of cages, biomass and reduced stocking density but this is still a damaging proposal that will adversely affect Arran and the Clyde region.
- The impact in the North Arran National Scenic Area is still large even though the number of cages and stocking density is reduced for the time being.
- This revised proposal will still have a serious negative impact on Arran's wild landscape and seascape, amenity, tourism value, economy and wildlife.

N.B. If you objected previously ensure you state that your comments in your previous objection still stand and that you object to the amended application for the following new reasons..... (Make those additional points using information from this briefing note, and your own reading, as you see fit and on topics which you feel are most important to you but which are relevant to the planners and planning committee)

2 Key changes in the amended proposal are:

- Reduction in number of cages from 20 to 12 and maximum stocking biomass from 5000 tonnes to 2300 tonnes of salmon. However, the overall operating license footprint is the same, which will allow for massive expansion in the future. It is worth remembering that the company always stated at face to face meetings that 5000 tonnes was the minimum they needed to make it a commercially viable investment.

- Although the number of cages is reduced the feedbarge is still large (noisy and brightly lit) with accommodation built in. The surface infrastructure of the farm will still extend for more than 800m along the shoreside directly affecting a surface area of c.21 football pitches and will be visible from several kms away.
- The so called 'innovative' but unproven SeaQure / Seaspine technology that was so prominent in the original application has been completely removed from the proposal. Therefore, this is just a standard archaic, open cage salmon farm with all its inherent polluting emissions, sea lice plumes affecting wild salmon, and environmentally damaging noise and lighting.
- Polluting salmon sewage effluent output is reduced but still highly significant and equivalent to a town of c.6000 people per day.
- The overall site area is a little changed foot in the door, which if approved guarantees the opportunity for future expansion to the original 5000 tonne proposal and beyond.
- The claimed but not guaranteed employment of direct jobs falls from 10 to 6; there is no commitment to any jobs benefiting local people. It is just as likely the facility could be serviced from a nearby mainland base with no new jobs on Arran.

3 Key issues to raise in addition to those previously referenced in the 2019 briefing document or raised by your previous objection:

● Landscape/seascape/amenity impact

- The application states that there will be 'significant effects of a substantial and adverse nature'. We disagree strongly with their conclusions that these effects will be of 'limited geographical extent'.
- Landscape and seascape will still clearly be impacted in the North Arran National Scenic Area and the proposed job numbers (6 FTE) and economic benefits do not outweigh this.
- The development still clearly contravenes the policies in the statutory North Ayrshire Local Development Plan (LDP2): Strategic Policy1 and Detailed Policies 8, 15, 16, 24 and 25 and the National Marine Plan 2015: Paragraph 4.28, Aquaculture Policy 5 and General Policy 9.

● Economics

- In the 'Social and Economic Impacts of the SSC North Arran Aquaculture Development' we see no cost benefit analysis. The only reference to cost-benefit with no supporting evidence states '*The magnitude of the benefits will comfortably outweigh the magnitude of the costs.*' However, no costs are presented apart from their own CAPEX and OPEX. There is no attempt to cost the impact on Arran's environment (and that of the Clyde region) and its effect on our existing economy.
- The inflated estimate of 37 wider jobs is caveated as it can be reduced through automation and remote monitoring. This is a trend that we see across the whole industry; more profit for shareholders and offshore companies for less local and wider employment as automation increases.

- Arran's landscape and seascape attract c.400,000 visitors per annum creating more than £60m of revenue, which supports very significant round the year employment plus seasonal employment, as well as providing the basis for support of the Islands essential public, health and infrastructure services. If the impact of this development on our National Scenic Area results in just 5% loss of visitor spending then this will amount to £3,000,000 per annum. This is a significant local economic impact when compared to the 6 direct jobs which are said will be created; these jobs are not guaranteed to be local or permanent or new employees.
 - Their confirmed commitment to an archaic, polluting and unsustainable way of farming fish is based wholly on short term shareholder return when innovative companies are now investing billions in closed containment, and land based farms worldwide.
 - Despite statements to the contrary this development does not give Arran any more economic security in a Covid-19 world, which as well as limiting tourism during lockdown this year also limited salmon sales and exports, and resulted in the processing plant closing and limited salmon production taking place.
- **Impact on and risk to wild salmon**
 - SNH (NatureScot) made it very clear in a holding response to NAC last year that the original development could affect wild Atlantic salmon which are a qualifying interest of the Endrick Water Special Area of Conservation (SAC).
 - The applicant has failed to supply North Ayrshire Council or SNH (now Nature Scotland) with any new modelling or any new data so they can carry out their statutory duty to assess (an Appropriate Assessment) the risk to the conservation objectives for the wild salmon population of the Endrick Water SAC (Special Area of Conservation). All they have done in their report is to present a reiteration of inadequate desktop work when it is clear that this and other farms will produce widespread plumes of sea lice which can travel and accumulate over large distances, parasitise and kill the salmon smolts as they migrate through the Clyde region.
 - The work advised by SNH to inform an Appropriate Assessment has not been undertaken and it is therefore not valid for the application to conclude that the proposal will have 'no adverse impact on the integrity of Endrick Water SAC' either alone or in combination with other developments. Under such circumstances the application should not be granted planning permission (Conservation (Natural Habitats, &c.) Regulations 1994 as amended or, for reserved matters, The Conservation of Habitats and Species Regulations 2017 - Endrick Water SAC).
 - The application has omitted to consider that one of the SAC conservation objectives is to maintain the range of the genetic types for the wild salmon and this is clearly important when there is a tangible risk of escapees interbreeding as shown by the recent escape of 50,000 salmon from Carradale North farm.

- **Disturbance to marine mammals**

- The number of acoustic deterrent devices (ADDs) has been reduced to 24 (in line with the reduced number of cages shown on the amended plans). These will be operating to scare seals away and they are also likely to disturb legally protected whales, dolphins and porpoise, which are known to feed in the immediate area.
- Many operators use these ADDs without appropriate licensing. There is no commitment in this application to obtain a European Protected Species license, and to operate these ADDs legally, only an undertaking to conduct a risk assessment later. This is not acceptable; this risk assessment and license approval should have formed part of the application as it is clear that their intention is to use them as they do at every other marine site they operate.
- Without a risk assessment and an EPS license to operate these ADDs then NAC planning must determine that these underwater noise generators will breach the LDP2: Detailed Policy 16, which protects against adverse effects on the natural environment.

Responding and commenting online

The NAC planning website is a bit complicated, but we have step-by- step instructions below to help you submit comments online.

N.B. We recommend preparing your comment in a MS Word document or text editor on your computer and copying and pasting it in to the system when ready. Otherwise, you may be timed out and lose your response. You are limited to 5000 characters within the comments box. If your prepared objection is larger than 5000 characters you may submit a brief comment stating that you will be submitting your full objection by email; in this case include the planning application number as the subject 19/00609/PPM and send your response to eplanning@north-ayrshire.gov.uk as email text or an attached file.

1) Register to comment

To be able to comment, you must first login as an existing user or **register for free here** <https://www.eplanning.north-ayrshire.gov.uk/OnlinePlanning/registrationWizard.do?action=start>

After you have registered, remember to check your emails (including junk folder) for an e-mail from dcontrol@north-ayrshire.gov.uk. **You must click on the link in this e-mail** to verify your registration.

After clicking on the verification link, you will obtain confirmation that registration is complete. Beneath this message there is a “login” button. Click this, and enter your details.

From here, you may be redirected to another part of the planning website. To get to the right page, just copy this URL, which should take you directly to planning application number **19/00609/PPM**

<https://www.eplanning.north-ayrshire.gov.uk/OnlinePlanning/applicationDetails.do?activeTab=makeComment&keyVal=PW6JPXLE04X00>

2) Commenting on the application

The above link will take you directly to a pre-populated form, with your contacts details listed. It states the planning details and asks you to select the type of commenter you are from a drop down list eg. Member of the public, neighbour etc. You are also **required to provide your stance** to the application: Object, Support or Neutral; ensure that you check the Object box.

You then have the opportunity to provide **up to 5000 characters** to support your stance taken. If you wish to **object**, please detail the specific objections you have in relation to issues relevant to planning. See this link for the council guidance on 'What you can comment on' <https://www.north-ayrshire.gov.uk/planning-and-building-standards/comment-on-a-planning-application.aspx>

Once you have finished commenting, submit your response by clicking the “**submit**” button at the bottom of the page you should then receive an email acknowledgement that your objection has been received. It may take some days before it appears on the portal as the council will redact any information which breaches GDPR regulations.