

Re: Planning Application - 19/00609/PPM - Fish Farm, Millstone Point, Arran

The Arran Community Council has discussed this application and it wishes to submit this response to North Ayrshire Council's Planning Department.

The existing Fish Farm in Lamlash Bay has been operating for over 30 years. We believe it should not carry any weight in citing a pre-existent precedent which would support this application. The location and size of the existing development, as compared to the proposed development are wholly different and as such, they should be viewed in total isolation from each other.

This application has ignited debate on the island, some of which has been very vocal and emotive. We have been very careful to listen to all local groups and individuals. We've looked very carefully at the supporting documentation, whilst at the same time balanced it against a strong local opinion. Indeed, some of the local opinion turned to more direct action in that organised groups confronted the applicants at planned meetings. Additionally, there have been organised events which received high profile coverage in the local press. By the same token the local press has included articles and letters from supporters of the application; we have considered both sides of the debate, as we take our role in the planning process very seriously.

The Marine Environment.

None of us on the community council would describe ourselves as marine scientists. However, we have read the applicants documentation, the environmental impact statement, the various responses from local groups and residents. Some of the latter information is very relevant and it must be considered very seriously. However, we as a community council would say this. It must be obvious, to anyone of a reasonable mind, that if you introduce a high concentration of a single fish species, along with its attendant waste, effluent, introduced chemicals and infrastructure; it will probably have an environmental impact of some description.

What we can say with certainty is, it will certainly not improve or enhance the existing marine environment. The sea waters around Arran are pristine and any development which may threaten this must be viewed with extreme caution. The application is not for a temporary structure but a large permanent development. Any environmental impact has the potential, not only to materialise in the short term but to manifest year on year thereafter.

The applicant's proposal is plausible, and it's well presented. It contains several statements which may give positive attributes to the local economy. However, when you begin to read and absorb the wealth of other material in the public domain, we begin to understand why local groups and individuals are not in favour of the proposal. Local groups and individuals have engaged in the application process and their respective submissions are before you for consideration.

One of the local groups which organised several local events and has been very active is the Community of Arran Seabed Trust. (C.O.A.S.T.) This organisation is well known, very respected and unlike most of the submissions, are from a community group. However, there are submissions too from local individuals who have obviously undertaken fastidious research in preparing a response. Such submissions are worthy of serious consideration, as they give a very contrasting view to the applicant's positive application.

Public opinion is very much polarised, you're either in favour or not and there are not many who have an impassive view. We would say that the balance of public opinion locally is more against the proposal than for it. This is evident on the comments posted on the North Ayrshire Council Planning website.

Location/Visuality

The site of the proposed development is set against the backdrop of the North Arran National Scenic Area, which is perhaps Arran's greatest tourist attribute. North Ayrshire Council for example have used the North Arran National Scenic Area as the cover photograph for their new Local Development Plan 2. Not surprising, as anyone looking at that photograph will immediately observe why North Arran is held in such high regard. Arran is often referred to as 'Brand Arran' and 'Scotland in Miniature' in many of its tourist promotional materials. A great many people, both nationally and internationally, hold the island in high esteem, whilst its local populous actively guard the island from any negative impacts.

The proposed site will only be accessible by boat or a footpath, along a stretch of coastline classified as 'isolated'. Within proximity is a 'Site of Special Scientific Interest', namely 'Hutton's Unconformity'. Anyone who has studied geology will know how important this location is. So much so that it receives many visitors each year and it's often described as a 'geologist's pilgrimage'. The isolated coastal path is itself a highly promoted island tourist route which carries thousands of walkers each year. It's natural beauty with its accompanying views across to the mainland, the islands of Bute and Cumbrae are outstanding.

To the south of the proposed site are two sets of illuminated poles, erected one nautical mile apart, forming part of the measured nautical mile, used by pleasure, merchant and military shipping; this too may have some significance.

The proposal itself is for a large development and it will be highly visible. Climbers on the Arran Hills, walkers on the coastal footpath, kayakers and even passengers on passing cruise ships, will be able to observe these structures quite clearly. The visual impact of these structures, at the location proposed will by contrast be striking when set again the isolated coastline behind. They will be the only man-made structures for miles around, they will be obvious and may look very out of place.

Financial Impact

We looked very hard at the proposals by the applicant stating that there will be a positive impact on the local economy. In particular, the creation of 10 full time jobs would be welcomed. However, the application does not state they are guaranteed and for how long they would be existent. One area of concern we have is that the Clyde Marine Region Assessment 2017, states quite clearly, that the numbers of employed people within the Scottish salmon farming industry has fallen year by year. Without doubt the reason for this is automation. How long would it be before Arran too became captured by this downward spiral? The proposed site could quite easily be serviced by boats from elsewhere and the mention of 10 local jobs may just be an aspiration or at worse a hollow promise. Resultantly it seems there is a very real question or doubt that the local economy would receive any significant long-term financial benefit.

We do however acknowledge that some of the infrastructure, (work boats) to the best of our knowledge, will be manufactured locally on the island. Whilst that would be a welcome proposition this could, quite possibly, be the only local direct positive impact. The netting will desirably be manufactured elsewhere in North Ayrshire. That would only bring benefit in that location.

Putting that into prospective, tourism is worth over 60 million pounds a year to the local economy. By comparison this application doesn't seem to offer any long-term financial benefit to the island, it may only have a negative impact in the long term.

Conclusion

The application in our eyes must be viewed by balancing the impacts, both positive and negative, concerning the environmental, economic and visual impact dimensions.

In considering the environmental aspect, we believe that the balance of available opinion against the proposal is the more persuasive. There is undoubtedly risk to the local natural marine environment. As we've already said, the waters around Arran are pristine and we all have a duty to preserve and manage them responsibly.

The economic aspect to us, falls short of giving the island guarantees of such an economic benefit that it would out-weigh the loss of visual amenity and potential damage to the marine environment. Whilst we find the applicants supporting information plausible, it could be viewed as aspirational.

Finally, the visual impact. This proposal is large, it will not be hidden from view nor will it in any way blend into the local land and sea scape. It will sit beneath the North Arran National Scenic Area having the potential to adversely impact on the visuality of the area. This too could lead to a negative impact on the local tourist industry. Tourists always vote with their feet and

this in turn could lead to financial loss to the local economy. This may have a strong influence in determining how this application is considered.

The Scottish National Marine Plan states:

'Aquaculture developments should avoid and or mitigate adverse impacts upon the seascape, landscape and the visual amenity of an area (following SNH Guidance), on the siting and design of aquaculture.

Our opinion is that this development impacts greatly on the North Arran National Scenic Area and as such may fail to meet the above test.

Policy 15 of the North Ayrshire Local Development Plan 2 states:

Development that affects the North Arran National Scenic Area, including the need to protect existing sport and recreation interests, will only be supported where:

- i) the objectives of the designation and the overall integrity of the area will not be compromised; or*
- ii) any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.*

Our opinion is that this application may fail to meet the tests at i) and ii) of the policy.

Policy 24 of the North Ayrshire Local Development Plan 2 states:

We will, in principle, support developments with a marine component or implication (such as marinas, ports, harbours, marine tourism and recreation, fish farms etc...)

*Where they are within a recognised **developed coastal location**.....*

This application proposes that the structures be located on what is classified as the **'isolated coast'** of the North Arran National Scenic Area and not a **'developed coastal location'**; as the policy requires. Therefore, this by far is the strongest reason to potentially refuse or at least remove any presumption in favour of the applicant. Our understanding of this policy suggests to us that the proposed structures simply may not be erected at this location.

Policy 25 of the North Ayrshire Local Development Plan 2 states:

We will in principle, support aquaculture development where it accords with the Marine Scotland's' locational guidelines for aquaculture and would result in economic and social benefits for local communities and the ongoing sustainable development of the aquaculture industry.

Proposals for new development will be supported where there are no unacceptable adverse impacts (including cumulatively) on the following:

- i) landscape, seascape and visual amenity*

- ii) biological carrying capacity of land and water bodies, including sea lochs and river systems*
- iii) the protection of the environment*
- iv) costal and marine species*
- v) the historic environment and the seabed*
- vi) other users of the marine environment such as, the M.O.D., navigational routes, tourism and recreation..... etc*

We believe the application may fail to meet sections i), iii), v) and vi). If that is accepted, then again, any presumption in favour of the applicant is removed.

Having considered the application fully, the Arran Community Council are unable to support the application for the reasons stated above.

Addendum

Since our last meeting, when this application was discussed, Scottish Salmon appears to have been sold to new owner/s. As such could we respectfully suggest that no further amendments be made to the application, without them first being scrutinised to the same degree as the initial application.

Yours Faithfully:

Arran Community Council