

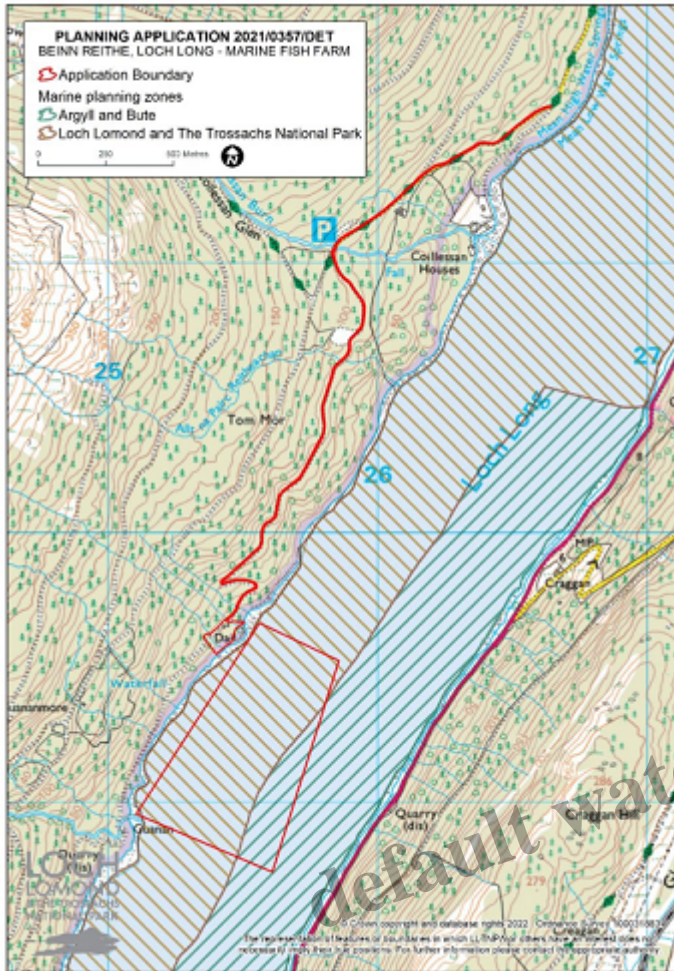
## The Loch Lomond and Trossachs National Park Authority and the Loch Long Fish Farm planning application

### Description



View from Three Lochs Way across to Beinn Reithe and the main part of the site of proposed fish farm on Long Long. The red markings are crude and approximate but better than anything I can find in the Planning Application. Five enclosures are proposed and the fifth, the harvesting pen, in reality would be just to the left of the photo. The trees around the shore base were harvested before plan by Forest and Land Scotland this summer so the forest now would look very different and the line of the existing access track above the zig-zag more visible. Photo October 2019.

The Planning Application ([see here](#) for planning papers) for a fish farm on Loch Long, along with associated road upgrades, was submitted just over a year ago. It is to be decided at a special meeting of the Loch Lomond and Trossachs National Park Authority (LLTNPA) Board in Arrochar on Monday after a site visit ([see here](#) for papers and details of meeting).



Site boundary. Only part of Loch Long is in the National Park due to the nuclear base.

The application hit the national media a couple of weeks ago in a Herald article with the misleading headline “National Parks hails salmon farm but application is hit by red tape” ([see here](#)). The LLTNPA hadn’t “hailed” the application, while it is evident from reading their Committee Report that officers had spent a year trying to get the developer to provide sufficient information to be able to make a decision. Moreover, the photo accompanying the article was of a very different type of fish farm, with multiple open cages, rather than the five enormous sealed enclosures that are being proposed by the developer. This is important because this new type of enclosure is claimed to prevent salmon escapes, control infestations of sea lice and stop the pollution of sea lochs, problems that have bedeviled the fish farming industry in Scotland for years.

But the article did include some very interesting quotes from Stewart Hawthorn, the Managing Director of Loch Long Salmon, the company making the application. On the one hand he claimed that Loch Long would be the “ideal location for a demonstration site of the technology previously never used in Scotland”, on the other that “The technology has been proven for decades”. If the technology was proved, there would be no need for a demonstration site. Actually, as a number of responses to the application have shown, there have been serious problems with the technology in Canada, while Norway, where it is used, is not the same as Scotland for example because water temperatures there are significantly lower.

This contraction points to the heart of the planning issue which is in essence quite simple. Why would anyone think that it was appropriate to build a fish farm in a National Park, let alone in the one part of a sea loch in Scotland which is partially protected by National Park status and with unproven technology?

## **LLTNPA officers’ response to the application**

Having frequently criticised LLTNPA planning officers in the past for failing to uphold the principles on which National Parks were founded, it is a pleasure to be able to say that this time they have got it right.

First, they have taken a strategic view of the importance of National Parks and have they recommended the application be rejected for the reasons outlined above:

“it is difficult to conclude that Loch Long is a unique site if this is the key site selection criteria when the length of coastline across the West of Scotland is considered. This is not the only option to locate this experimental farm. Scottish Planning Policy stipulates that planning authorities should apply the precautionary principle where the impacts of a proposed development on nationally or internationally significant landscape or natural heritage resources are uncertain but there is sound evidence indicating that significant irreversible damage could occur”

Second, they have backed this up with a series of robust arguments about other aspects of the application. The Committee Report may be 73 pages ([see here](#)) but for anyone who has been concerned about how the LLTNPA has approached planning applications in the past or might do in the future, it is well worth reading. I will illustrate this with a number of quotes from the report:

### Quote – risks

“The applicant has stated that “the Beinn Reithe salmon farm in Loch Long, if consented, will be the largest salmon farm in Scotland by a considerable margin”. The scale of the proposal is significant, the impacts of the development are uncertain, and a risk-based approach must be taken”

**Comment:** apply that thinking to the proposed Flamingo Land development in Balloch!

### Quotes – landscape

“The proposed development would have an industrial character and would notably contrast with, and detract from, the largely undeveloped and remote character of the local landscape. The proposed

development would be very noticeable in such a sensitive landscape setting. The terrestrial development would adversely affect the marked transition of steep-sided hills rising dramatically from the narrow loch and it would significantly erode several key characteristics that are integral to defining the marine and landscape gateway into the National Park at this location.

**Comment:** it is interesting that the LLTNPA is putting the emphasis on the landforms, which are largely free from development (top photo), not on the industrial forestry which has detracted from the beauty. Those forestry plantations along the loch could have been used as excuse to let the development go ahead on the grounds that the surface of the landscape has been significantly altered but instead have been treated as sensitive areas. That I believe is right and is why the LLTNPA should be concerned about issues such as the standard of forestry tracks ([see here for example](#)).

“8.8.2. The proposed development would introduce man-made structures into the coastline and associated noise and disturbance that is not currently experienced. Lighting on land and water-based infrastructure would be very obvious during dark hours, contrasting with the otherwise unlit and undeveloped locality.”

**Comment:** this is very different to the arguments the LLTNPA made when recommending that the Hunter Foundation’s proposed leadership centre on the south shore of Loch Lomond be granted planning permission ([see here for example](#)).

“8.8.3. In terms of seascape character, the proposed development would notably detract from most key characteristics of the Coastal Character Area. The proposed development would introduce substantial new structures into an undeveloped part of the seascape and, if consented, the proposed development would be a significant departure away from the existing pattern of irregularly distributed modest development to the western shore. Considering the proposal in association with the oil terminal and MOD base, outwith the National Park to the south, the influence of prominent industrial infrastructure at a marine entrance to the National Park would notably increase. The integrity of the important marine gateway into the National Park would be significantly eroded”.

**Comment:** instead of using existing developments that mar Loch Long as a reason to allow further development, the LLTPNA has focussed on protecting what is left. That is absolutely right!

“The National Park landscape adviser has advised that it is very apparent that during the early stages of the operational development, all terrestrial based infrastructure, including the new access road leading up the hillside, would be highly visible from many locations and this would be exacerbated by the cumulative effects with ongoing forestry operations”

**Comment:** there are many examples from past planning application (e.g almost every hydro application within the National Park) of LLTNPA officers arguing that impacts during the construction phase of developments are only temporary and can be ignored.

#### Quote – ancient woodland

“Natural Environment Policy 8 of the LDP reflects Scottish Government policy and does not support proposals that would result in the loss or deterioration of an ancient or long-established plantation or semi-natural woodland unless there are overriding public benefits from the proposed development that outweigh the loss of the woodland habitat. The “public benefit assessment” is not entirely

straightforward as the assessment of the potential public benefits associated with compensatory planting has to recognise that it may take many years to match those of the woodland being removed. Moreover, ancient woodland is effectively irreplaceable [my emphasis].”

**Comment:** apply that thinking to Flamingo Land’s current application at Balloch where it is still proposing to develop part of Drumkinnon Woods!

#### Quotes – Climate and nature

“The National Park Authority does not agree with the applicant’s statements that the proposal aligns with the National Park’s ambitions of playing a crucial role in tackling the climate emergency and the nature crisis. The draft NPF4 [National Planning Framework 4] states that in order to achieve a net zero, nature-positive Scotland, we must “rebalance the planning system so that climate change and nature recovery “are the primary guiding principles for all our plans and all our decisions”. Whilst NPF4 is currently in draft format and not yet a material planning consideration, this is the current context within which planning decisions are made. The fragile state of the precious nature of the National Park, including the marine environment and wild fish populations, is recognised and the National Park’s “Future Nature” objectives are to go further than protecting habitats and species by reversing decline and restoring nature. The risk to wild salmonid populations from the proposed development does not align with these objectives”

**Comment:** I knew little about the movements of escaped salmon and have also raised concerns that almost the only time nature conservation is given consideration in planning applications is in relation to EU protected sites. LLTNPA officers, however, have in this case quoted research from Marine Scotland which showed that “in 2020 there was an escape of farmed salmon from a fish farm in Carradale, Argyll. As a result of this incident farmed salmon were found both within and outwith the wider Firth of Clyde including in the Endrick Water SAC” [Special Area of Conservation protected for salmon and lamprey]. It is fantastic the LLTNPA appears to be taking SACs seriously and also appears aware of the need in respect to wild salmon to protect them wherever they are. This approach is quite a contrast to the Cononish goldmine application where the risk of silt from spoil heaps getting into the Tay SAC was more or less discounted by LLTNPA offices ([see here](#) and [here](#)).

The author of the report, Alison Williamson, and her boss Stuart Mearns, whom I have often criticised in the past, are to be congratulated for a very thorough piece of work that upholds National Park principles.

## **A change in approach by the LLTNPA to planning applications?**

What I hope the quotes have demonstrated is that this Committee Report is very different to previous reports on planning applications, putting National Park principles before development at what at times has seemed like any cost.

Officers have done this despite considerable political pressure in this case to put development interests first. That is demonstrated by both Fergus Ewing, MSP for Inverness and Nairn and former minister for the rural economy, and the Cabinet Secretary for the Constitution, Angus Robertson, both writing in

support of the application. It is not usual for MSPs to comment on planning applications outside their local area and these comments show the degree of influence that the fish farming industry has over the Scottish Government. Mr Robertson's letter reveals that behind the scenes civil servants having been putting huge pressure on the LLTNPA to approve the application:

That is why I understand Scottish  
indicating they see this project as "s

So why have the LLTNPA decided to resist this political pressure? Part of the reason may lie in the number of objections to the application (202 compared to 72 letters of support) many of which represent community interests in the Clyde estuary. Another reason may be the climate and nature emergencies although the LLTNPA Board have been talking about this for some time without it changing how planning applications are handled. What is different, however, is we now have a Green MSP, Lorna Slater, who is Minister responsible for National Parks and appears to want them to make a real difference – even if she has made some mistaken on the way, for example allowing herself to be photographed planting trees with plastic tubes ([see here](#)).

My suspicion is it is the appointment of Lorna Slater which explains the change in approach by the LLTNPA planners, while the response from Mr Robertson suggests there may be a struggle going on at the heart of government. Some of that struggle may be reflected in the discussion by the Board at their meeting tomorrow.

No-one should assume therefore that the arguments used by officers for rejecting the Loch Long fish farm planning application will be endorsed by the Board tomorrow or that officers will be allowed to make the same arguments in respect to the Flamingo Land planning application. The concerned public need to keep up the pressure for the LLTNPA to change.

## **The challenge of how to green jobs in our National Parks**

Arrochar, Ardlui and Tarbet Community Council was one of the organisations to support the proposed development on the grounds of high levels of local unemployment and that it would bring much needed jobs to the area. They were totally right about the first point – the Arrochar area desperately needs investment – but I believe they were wrong about second. The likelihood is that most of the jobs created by the Loch Long fish farm would go to people from elsewhere, although potentially some of these might then move into the local area.

The real challenge at Arrochar is to reform how Forest and Land Scotland operates so that instead of the vast areas of forest which it owns in the area being managed remotely and through contractors and according to industrial practices, the land is managed for climate, nature and the local community.

The moral bankruptcy of FLS – demonstrated in their treatment of the local community at Glenmore ([see here](#)) – was again shown in their support for this planning application. The suspicion is this was primarily motivated by finance since the developer would have upgraded the access road, saving FLS money, and paid rent for the land.



Photo credit LLTNPA

The Committee Report contains a photo of the felling that took place this summer on FLS' land around the proposed development. This had been scheduled to take place between 2025-29. While some larch, which are being felled in an attempt to stop the spread of *Phytophthora ramorum*, may have been involved the felling looks far more extensive than that. The question this raises therefore is whether FLS brought the felling forward in an attempt to influence the planning application? If so, they have failed because LLTNPA officers have asserted that whatever its current state, it is the future that matters both in terms of landscape impacts and ancient woodland. Brilliant!

There is huge potential for our National Parks and the Minister responsible, Lorna Slater, to start taking a lead on the need to reform FLS and to create local jobs. Arrochar would be a very good place to start. Until and unless this happens, there will be constant pressure on our National Parks as planning authorities to approve destructive developments on the grounds that they are the only way to create local jobs. The political challenge is for Lorna Slater to influence the Cabinet Secretary for Rural Affairs, Mairi Gougeon, who is responsible for forestry to reform how FLS operates.

## Category

1. Loch Lomond and Trossachs

**Tags**

1. FLS
2. LLTNPA
3. Local communities
4. planning
5. Scottish Government
6. scottish natural heritage

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