

Integrated Coastal Zone Management Plan

Loch Etive

A Spatial Planning Framework
for Future Development

Consultation Report

january 2011

Marine & Coastal Development Unit, Development and Infrastructure Services, Argyll & Bute Council

Funded by



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1. BACKGROUND

The Argyll and Bute Council Structure Plan 2002 outlines the Council's objectives for coastal Planning and emphasises the necessity of working with all the relevant sectors to fully harness the productive capacity of the marine and coastal area whilst safeguarding its unique environmental qualities, through sustainable development. In recognition of the importance of our coastal and marine environment the Council sought and secured funding to initiate the Loch Etive Integrated Coastal Zone Management (ICZM) project as a means of accomplishing the sustainable management of this significant marine area.

Argyll and Bute Council have developed the Loch Etive Integrated Coastal Zone Management Plan in collaboration with local stakeholders and regulators. It is designed to complement the Argyll & Bute Development Plan (Structure and Local Plan) and aims to aid the evaluation of development proposals, help minimise conflicts of interest and guide future investment. This Plan is non-statutory and will provide guidance for local authority Planners, regulators and stakeholders on the future use and development of the marine waters and surrounding coast of Loch Etive.

Following a six week public consultation on the Draft Loch Etive ICZM Plan on 19th November 2010, comments received during the consultation process have been collated by the Marine & Coastal Development Unit and analysed and considered along with other available evidence to develop a final Draft of the Loch Etive ICZM Plan. Full details of the individual comments received during the consultation and the Council's response to these are set out in Appendix I to this report.

2. CONSULTATION PROCESS

The public consultation on the Draft Loch Etive ICZM Plan ran for 6 weeks, from 8 October to 19 November 2010. A contact list of over 188 individuals and organisations (Loch Etive ICZM Stakeholder Group) that had been involved in the development of the Plan were sent details of the consultation and the Draft Plan. This information was also sent out to additional members of the public following the public advertisement of the consultation. In addition, Connel, North Connel, Taynuilt, Highland, Glencoe and Glen Etive Community Councils were consulted by letter and received a copy of the Draft Plan.

Over the period of the consultation, a total of 20 paper copies and 44 CD copies of the Draft Plan were sent out. The Plan was also accessible to view or download from the Council website.

2.1 How was information made available during the consultation?

Website

All information on the consultation, the Draft ICZM Plan and supporting documents were made available on the Council website at www.argyll-bute.gov.uk/lochetive, which could also be accessed via a link from the Argyll and Bute Council website homepage.

E-mail/letter

All members of the ICZM Stakeholder Group were consulted on the Draft Plan by e-mail, or letter.

Libraries

Hard copies of the Draft Plan and supporting information were sent to the Oban and Mobile library.

Consultation Events

During the consultation period, public drop in sessions were held in Connel, Taynuilt and North Connel to promote the consultation and answer questions about the draft plan. Between 6 and 9 people attended each event all wanting to know more about the Plan how it was set out. Specific comments focused on sewage discharges, tidal power development, fish farming, invasive species and access

concerns. In addition, the consultation was promoted at the Farmers Market at Kintallen Home Farm where 12 copies of the Plan were distributed.

2.2 What information was made available?

Detailed information about the consultation was made available as an information note that was sent to individuals and organisations by email or letter and was available on the Council website. This included the following information:

- Background to the consultation
- How to respond and how comments will be considered
- Draft Loch Etive ICZM Plan
- Consultation questions – what are your views?
- Contact details for enquires

2.3 Publicity

A press release launching the consultation was put on the Council website and placed in the Oban Times. Adverts with details of the public meetings and the consultation were placed in the Oban Times, and a direct link from Argyll & Bute Council home page to the ICZM consultation pages was set up.

3. OVERVIEW OF RESULTS

A total of 25 written consultation responses were received, comprising 8 individual and 17 organisation responses. Although a summary of the main comments from the consultation is provided below, it is necessary to view the full comments made and the Council response to each individual point in order to gain a full picture of the consultation, which is set out in Appendix I to this report.

3.1 Summary of main comments

Overall, responses to the public consultation were positive about the process of plan development and supportive of the policies and guidance detailed in the plan. Most respondents felt the plan was comprehensive and well researched with the appropriate level of detail to allow it to be used as guidance on the future use and development of Loch Etive. Despite its size, the plan was considered to be well structured, easy to navigate to the relevant section, and easy to read.

The main points raised by the public consultation related to existing access issues and concern about the potential for increased recreational use of Loch Etive resulting from opportunities identified in the plan to improve facilities such as car parking and slipways. There were also concerns about retaining the unspoilt remoteness of some parts of Loch Etive and concerns about the threats from introduced invasive non native species.

Generally the comments received have resulted in minor changes to the plan and the inclusion of additional information on interests and activities. The Consultation Report (Annex 2) provides a summary of the main comments from the consultation and the main changes made to the plan as a result of these responses, in addition to full details of the individual comments received during the consultation and the Council's response.

Appendix I - Tabulated comments, responses and amendments resulting from public consultation

Section/ Issue	Individual/ organisation	Comment	Response
General	Individual [Response 16]	Thank you and your colleagues for the copy of the Consultative Draft report and the opportunity to take part in the meetings. The report is very thorough and detailed.	Comments noted.
General	Individual [Response 17]	Overall I think the Loch Etive ICZM Plan is a very good document and the MCDU should be congratulated on its production.	Comments noted and support welcomed.
General	Individual [Response 2]	Congratulations on your very comprehensive and far ranging consultative draft and thanks to your office for sending a copy to me. I was sorry not have been able to attend any of the evenings but I would like to make one or two comments.	Comments noted
General	Individual [Response 1]	<p>1. The need for greater acknowledgement of geomorphological uniqueness in the Plan.</p> <p>The Management Plan concentrates its focus on ecological issues, but gives only cursory attention to geomorphological issues that make Loch Etive scenically attractive and, indeed, provide the essential physical framework for the biological issues that are claimed as unique.</p> <p>So, for example, the remarkable geomorphological phenomenon of the Falls of Lora needs greater emphasis as a feature attractive not only to those who value and study unusual tidal hydraulics, but also (and mainly) tourists. Indeed, as a major tourist attraction, the Falls require greater publicity and access facilities (a larger car park) to match. The shifting time of this tide-driven phenomenon (both daily and in the context of lunar cycle) calls for greater effort on behalf of Scottish Tourist Information to give data about the incidence and magnitude of the ebb and flood flows, so that tourist visits can be scheduled appropriately to maximise appreciation. A visitor information board on-site would help give greater understanding of the hydraulic processes.</p> <p>Yet another example of the need for greater emphasis on geomorphology is the desirability of describing the physical features that make it important to celebrate and maintain the qualities of Loch Etive above Bonawe. So, while the report alludes to the 'fjord-like' nature of upper Loch Etive, it ignores, or, at least, does not draw attention to the wondrous views of a ram-rod-like loch flanked by the Munros of the Ben Cruachan and Ben Starav massifs and the other, lesser, but no less impressive, mountains. At smaller scale, there are important fan-deltas at the mouths of Glen Kinglas,</p>	<p>Comments noted. The Site Description (section 2.2) of the Plan provides limited information on geology and this section has been expanded to highlight some of the geomorphological interests of Loch Etive.</p> <p>The Plan identifies the need for a larger car park at this location and we agree that this feature would benefit from greater promotion including when the best times to visit the falls are, in relation to the tides. The website www.falloflora.info provides excellent information on the best tides to view and kayak the falls. There used to be a visitor board at the Falls but all that is left is the plinth. This could be redeveloped with appropriate information for visitors.</p> <p>Section 2.2 of the Plan has been updated detailed above.</p>

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		<p>Glen Liever, etc. that mark the interaction between river and loch.</p> <p>Importantly, there is a debate to be encouraged that would evaluate the need to maintain at least one elongate sea loch free from motorized traffic, both on land, given the absence of flanking roads, and on water, where some would argue that an increasing intrusion of motor-boats and jet-skis (perhaps as part of the facilitation of water sports) would endanger the tranquility of a special landscape that can be promoted as a tourist attraction for its peace and undeveloped quiet beauty.</p>	<p>While the plan discourages power boating and jet skiing towards the head of the Loch (Policy Zone F) the aquaculture industry and forestry require motorised boat traffic to service fish farms and to transport timber from the head of the Loch by sea. In addition, sea angling and to a lesser extent diving are popular in Policy Zone E, both using motorised vessels. Occasional charter boats also travel to head of the Loch to enjoy the remote and tranquil nature of this part of Loch Etive. Any restriction on motorised vessels would impact on these users who at the current levels of use are not considered to be adversely affecting the remote and tranquil character of upper Loch Etive.</p>
General	Individual [Response 4]	<p>I think the draft plan is a well thought piece of work. I found it easy to understand, it is well structured and easy to follow. I personally liked the recommendations sessions very much. Regarding the content, I agree with most of the recommendations and I believe the action plan covers the most relevant aspects that are important to ensure that Loch Etive is well managed in a sustainable form.</p> <p>The session regarding tidal power was clear in differentiating between small scale and commercial scale uses. However extreme caution should be applied here including rigorous assessments since the potential impacts of even small scale tidal power operations may vary greatly depending on numbers and locations. Uncontrolled proliferation should be avoided otherwise may reach an impact similar in scale to the one that may be caused by one single tidal power station. The line between small scale and commercial scale has to be clear. Engineering is evolving very rapidly therefore policies should be prepared for potential grey areas in the future where intermediate forms are also regulated.</p> <p>Now more in general, the yearly revision proposed in the action plan will be key in implementing policies and adapt to changing circumstances as well in reflecting increased knowledge. This will allow the plan to evolve accordingly to the needs of the area and pressures exerted on the loch which may not be fully identified at present and may change over time.</p>	<p>Comments noted.</p> <p>Comments noted. The Council shares this view and any proposal for small scale renewable development would require detailed assessment, particularly due to the environmental and economic sensitivity of the Loch. Such an assessment would consider cumulative effects of more than one development if this was proposed. It is currently not possible to identify the line between small and commercial scale development as tried and tested technology has not yet been developed and we therefore do not know the size or design of small scale tidal devices. The existing policy in the Plan is considered to be of appropriate flexibility to deal with changes in scale and design of tidal devices.</p> <p>Comments noted and agreed. Ongoing and future research will be essential in informing the assessment of development proposals and future revision of the Plan. It is of great benefit to the Council to have SAMS based in Argyll and be able to access the local knowledge and expertise of</p>

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		<p>The results of ongoing research will be very useful and hopefully available when the times of revision and update are due. The Scottish Association for Marine Science being very close, uses the loch as an ongoing study site for several research projects and for education purposes as well. The Marine & Coastal Development Unit benefits from the local expertise of scientists based at SAMS. The links between the Scottish Association for Marine Science and the Marine & Coastal Development Unit should be not only anecdotal but solid and clear. A strong relationship cemented on common interests will benefit both organizations including the ICZM plan for Loch Etive. This loch represents a unique habitat with unique features that are worth preserving and protecting with a sustainable approach.</p>	<p>scientists. The Council values its existing working relationship with SAMS and is keen to retain strong links which benefit both parties and develop common interests.</p>
General	Individual [Response 22]	<p>I noticed that the Argyll Bird Club wasn't listed at the end of the section on Ardmucknish Bay, although there were some notes on the importance of Eilean Beag and Eilean Mor off Dunstaffnage for breeding gulls and waders.</p> <p>The old sand pits behind the beach west of Port Selma, Benderloch are proving to be of local importance for a number of breeding birds including Moorhen, which is a scarce breeder in Argyll & Bute and Water Rail, which is also scarce.</p> <p>Public usage of the adjacent shingle beach causes disturbance to the attempts of Oystercatcher and Ringed Plover to breed here. However, if the hinterland by the gravel pits could be turned into a Local Nature Reserve, it would be feasible to create new protected breeding habitat for these marine species, as has been done elsewhere in the UK. This would help to offset losses of breeding sites on the beach shingle and at other locations around the bay where there is disturbance from development e.g. (Poppies and new building at Scottish Marine Institute) and recreational use (Ledaig Point and Tralee beach). I would be grateful if you could bear the above points in mind during your deliberations. You are probably aware of the dispute over extraction of gravel from the beach at Tralee in the 1980s.</p>	<p>Comments noted. The Argyll Bird Club has been added to the table of consultees in Policy Zone A.</p> <p>Comments noted and a revised comment has been added to the Biodiversity paragraph in Policy Zone A.</p> <p>Comments noted. This location could be considered by the Council as a potential Local Nature Conservation Site, under the new Local Development Plan, scheduled to be adopted in 2012. This possible proposal will be discussed with the Council's biodiversity officer and SNH.</p>
General	Individual [Response 5]	<p>Are there any plans to force homeowners to fit septic tanks?</p>	<p>Home owners whose private sewage discharges into coastal waters or water courses that run into coastal waters, and do not have a discharge consent, should register their discharge with SEPA under the Controlled Activities Regulations. Existing untreated discharges that are brought to the attention of SEPA will have conditions imposed in an</p>

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		<p>Why wasn't the Connel Bridge Mooring association consulted?</p> <p>The North Connel slipway is public I believe not private. Please check your records rather than listen to a person who is claiming they own it.</p> <p>What are you doing to protect fish stocks in the Loch? It is fished by foreign boats will you stop this?</p> <p>This sounds like a lot of additional jobs how many and at what cost? Who pays for the above?</p>	<p>authorisation, requiring appropriate treatment to be installed within a specified timescale.</p> <p>The Council was not aware that there was a separate moorings association at Connel Bridge, however the mooring area used by this association is included and taken account of in the Plan. The association is identified as a non-statutory consultee in Policy Zone B.</p> <p>We have checked the ownership of this slipway and confirmed that this area of land is privately owned. This slipway was never in Council ownership, belonging originally to the train company and is now under the same ownership as the Lochnell Arms Hotel.</p> <p>The Council has no control over the management of fish stocks. This is controlled by the Common Fisheries Policy at an EU level and the Scottish Government at a national level. As a result the plan does not focus on fisheries management but does discourage long-lining in order to protect the important spurdog (spiny dogfish) population in the Loch.</p> <p>The implementation of this plan does not require any additional jobs. The Action Plan will be delivered within existing Council budgets (Planning revenue budget), limited to officer time. External funding will be required for some actions to be implemented and therefore is not an additional financial burden to the Council. The Plan identifies many development opportunities including aquaculture development and access improvements, which may be taken forward by private developers or local community organisations.</p>
General	Connel Community Council (Organisation Response 24)	I refer to our telephone conversation today and, as I explained, I doubt if we will have any time to seek opinion from the floor at the next meeting of the Community Council on the excellent report which you have recently published. However, I do know from speaking to those Community Councillors who attended some (if not all) of the presentations, that the final document is being very well received and covers, in great detail, all the many aspects of the wide variety of discussions which have taken place	Comments noted and support welcomed.

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		<p>during the last few months.</p> <p>My own view is that the fact-finding workshop consultations were so thorough as to have exhausted the need for any further comment! I'm sure there will be specific cases where individuals with more insight and expertise than me can contribute suggestions for amendment or expansion. But I do feel that it is a well researched and balanced document which I hope will be put to good use in the years that lie ahead.</p>	
General	Taynuilt Community Council [Organisation Response 7]	<p>We think that this is an excellent consultative draft and we would be surprised if there will be any need to make many amendments. Having been involved in the process a number of years ago and this year when the plan was re-visited we have been very impressed in the manner in which the information was obtained. Each meeting was well structured, the speakers who were invited relayed vital information and the resulting discussions which followed provided the group with the detail required to move on to a satisfactory conclusion.</p> <p>You and your colleagues have to be congratulated for producing the plan.</p>	Comments noted and support welcomed.
General	SNH [Organisation Response 3]	<p>We are grateful for the opportunity to comment on the draft Plan. On forming this response I have canvassed views from Stephen Austin - Area Officer North Argyll and Andrew Campbell - Operations Manager Argyll.</p> <p>The document is well structured and reads easily, although long and often repetitive, it is easy to navigate to the section required and read only that "stand alone" section for all the information necessary.</p> <p>There is a general theme running through the document in favour of improving access to and promoting Loch Etive. This is mentioned in the General Policies, POLICY LE INF, the Policy Zones and the Policy guidance. Some areas of Loch Etive are very easy to access (the shoreline near the Iron Furnace for example) but some of the planning decisions already made (strip development on the north shore for example) restricts access to the shoreline along large lengths of the loch. Also the rough nature of the tracks on both sides of the upper loch precludes access and interpretation of the marine environment of this area without significant changes to infrastructure which could damage the very wild and remote</p>	<p>Comments noted.</p> <p>Comments noted. The structure of the activities sections and policy zones was deliberately standardised to provide a consistent approach and display of information. The Council recognises that this will make the Plan seem repetitive but welcome the view that it is easy to navigate to the required section.</p> <p>Comments noted. While the plan does promote improved access to the loch for recreational and commercial activities it is not the intention of the Plan to promote improvements in all areas of the Loch. The General Policy (LE GEN 1) and Policy LE INF1 has been amended accordingly.</p>

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		<p>nature of this area. Perhaps these statements could be tempered by saying promotion and interpretation and improved access and facilities is appropriate in some areas but the wild and remote nature of the loch should be maintained elsewhere.</p> <p>At the moment it is suggested that access should be improved and facilities provided in all the Policy Zones except A (because they are not required) and E (because presumably it has been decided that this would not be appropriate although this isn't stated). We suggest that the need for access and facilities in each Policy Zone should be ranked in order of importance so that the best location for them can be decided if the funds become available. It might also be useful in ranking the most appropriate areas to consider if land is available to make facilities possible in each zone. The Plan should also make it clear that there are no funds available for improving facilities at present as we understand it.</p> <p>We also feel that the importance of Loch Etive for marine recreation (particularly scuba diving) has been over emphasised.</p>	<p>It should be noted that many of the opportunities to improve access which are identified in the Policy Zones are minor improvements to existing infrastructure and the opportunities for new facilities relate to very small scale infrastructure. The Council has reviewed the opportunities and Policy Guidance in each policy zone and included an additional paragraph in section 6.3.10 of the plan which highlights the developments of highest and lowest importance. All Policy Zone opportunities for access improvements, promoting access and interpretation have been reviewed which has led to some being removed, some amended and some amalgamated.</p> <p>SNH are correct in stating that the Council has not allocated any funds to taking forward opportunities identified in the Plan. Identification of opportunities does not mean that the Council will take them forward as the plan is simply highlighting opportunities and not listing specific Council proposals. An additional sentence has been added to section 7.2 of the plan to make this clear. Opportunities could be taken forward by communities, businesses and local organisations and external funding sources may be available for some projects.</p> <p>While there may be other parts of Argyll and Bute that are more important for marine recreation, Loch Etive is of national importance as a sea angling destination and is becoming increasingly popular for seakayaking. For many activities Loch Etive is used to a greater degree during bad weather when other more exposed sites are not accessible. The Council considers that the introductory paragraph on Scuba Diving (section 6.3.3) appropriately describes the relative importance of this activity.</p>

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		<p>We understand that visitors to the area may have acted irresponsibly in the past and that this can cause a nuisance to local residents. However there are methods of dealing with careless visitor behaviour (for example by targeting the Outdoor Access Code at specific user groups such as divers or anglers) other than installing toilets for their use and signs telling them how to behave. Indeed installing facilities could increase the number of visitors and compound the problem. We suggest that the visitor issue is properly assessed and a more focussed plan of action identified to deal with any problems identified.</p>	<p>Comments noted. The Council agrees that targeting the Outdoor Access Code and other good practice guidance at specific user groups is a sensible method of dealing with access issues. However, it can often be a small minority of users who behave irresponsibly who are not a member of a club, group or association. The Plan does promote good practice to recreational user groups and does not suggest installing signs telling them how to behave. Opportunities have been identified for providing toilet facilities but these are only at two locations and are as a result of a specific need being identified by the recreational users themselves.</p> <p>Where appropriate, individual access issues are being considered in more detail with local residents, landowners, recreational users and the Council's access team to try and resolve conflicts.</p>
General	West Connel Mooring Owners Association [Organisation Response 6]	<p>I have read the project report with interest and noted that West Connel Mooring Owners Association are listed as a body to be consulted as part of the project and I confirm that we welcome the opportunity to have an input to any future discussions.</p> <p>I also confirm we have 20 moorings site with our designated area in the bay in Connel.</p>	<p>Comments noted. The secretary's details have been added to the project contact list to ensure you receive future correspondence relating to the Plan.</p> <p>We have noted this information in our project records.</p>
General	Seafreedomkayak [Organisation Response 9]	<p>Just to say that I have read the ICZM through and am very happy with it. I have recommended that the SCA make a statement welcoming the plan, but for myself I would like to thank you for listening and for all the effort you have put in to carry out a real consultation.</p>	<p>Comments noted and support welcomed.</p>
General	Dawnfresh [Organisation Response 10]	<p>I am writing in response to the above consultation on behalf of Dawnfresh Farming Ltd who as you know farm trout at a number of sites in Loch Etive. Dawnfresh are grateful to have had the opportunity to give a presentation on our farming operations during one of the public meetings and to have been involved in the discussion and development of the draft plan.</p> <p>The finished document is a very detailed, informative and readable piece of work and you and your colleagues should be congratulated for your efforts. Being required to read a large number of consultation and reports in the course of my job the Draft Loch Etive ICZM was unusual in being an engaging and interesting read, particularly for those with an association with Loch Etive.</p>	<p>Comments noted and support welcomed.</p>

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		<p>In general we are happy with the content of the draft plan and the objectives underpinning the ICZM, but have some comments relating to specific sections within the document.</p>	
General	Historic Scotland [Organisation Response 11]	<p>Thank you for consulting Historic Scotland on the Management Plan for the Loch Etive Integrated Coastal Zone Management Plan (ICZM). I am providing this view in relation to Historic Scotland’s statutory remit, that is; scheduled monuments and their setting, category A listed buildings and their setting, gardens and designed landscapes included in the Inventory and protected wrecks. I have responded to the Environmental Report separately, via the Scottish Government’s SEA Gateway.</p> <p>We support the preparation of this plan and consider it to be an important tool in providing developers with more guidance in relation to the Loch Etive area.</p> <p>Overall, we are content that the plan provides adequate protection for the historic environment and that significant impacts can be mitigated through the overarching policy framework which is contained within it and the current Local Plan. Our specific comments on each policy zone are included in the attached annex.</p>	Comments and support noted.
General	Marine Concern [Organisation Response 12]	<p>The organisers and facilitators of the second tranche Loch Etive Integrated Coastal Zone Management (ICZM) program are to be congratulated in the way in which the project has been approached and open to all “stakeholders”. In the past much concern has arisen from “restricted” stakeholders attending similar projects, resulting in a commercial bias, which clearly leaves results polarised in favour of the commercial sectors.</p> <p>Historically, especially in the Lorn area there have been problematic situations arising from marine management groups and forums; recent history probably stems to the Loch Sween fiasco, where all “stakeholders”, and officials became losers of a very special habitat. Little appeared to be learnt during the initial process of the forerunner to the Argyll Management Forum which was addressed in its infancy, by a senior member of Scottish Government, Inshore Fisheries stating that there would be “No restriction to scallop dredgers in the Firth of Lorn SAC”. A situation developed where a few government departments, a small sector of Scottish Natural Heritage and some of the previous make-up of the ABC Marine and Coastal Development Unit worked closely together, it could be argued too closely, the combined comments and communications obtained through FOI proved that at least one local group participation</p>	<p>Comments noted and support welcomed.</p> <p>Comments noted.</p>

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		<p>was compromised, and several local management groups were severely lacking in a balanced structure between commercial users and environmental groups; the whole situation was far from professional.</p> <p>The Firth of Lorn SAC and Loch Creran SAC case went to the European Commission in the form of two independent complaints; as a result, the current closure of both SACs is testament to events. As this ICZM is to be adopted by planning and future coastal management we feel that it is imperative to learn from past mistakes, so that they can be avoided in future schemes. Furthermore; despite having a large stakeholder involvement very little discord emerged during the whole process. In fact, the process enabled previously sceptical groups, enlightenment. They started to understand the view points of others: most learnt that just about all had a deep seated special regard for the state and future of what is seen as “Our Loch”.</p> <p>A special thank you is due to Mark, Lorraine, Isaac (ABC Coastal & Marine Development Unit) and Ruth (SAMS) for their input which has made the Loch Etive ICZM project so successful.</p> <p>Development: Despite being situated on the Scottish west coast where precipitation is prevalent, there are numerous locations along the shoreline where water supply is often short. Bonawe and the settlement on the north shore is one area where the supply off the “hill” regularly dries, with a greater number of new builds in the area it is only a matter of time before supplies run out, causing huge problems to many in council housing, disabled and old age pensioners. This should be taken into account before further planning is granted.</p> <p>Future Ideals and Initiatives In line with current government thinking on MPAs and providing a network of protected areas; Loch Etive, Lismore and Loch Creran, Lynn of Lorn, the Firth of Lorn, and Sound of Mull should be considered for an MPA. A large enough area to allow for some “real” zoning to be trialled e.g. 70% static gear, and aquaculture, 30% no-take. Along with the introduction of re-introducing the “Three Mile Limit” (restricting mobile fishery gear), we would like to suggest the MPA idea for consideration.</p>	<p>Comments noted. It is hoped that the Council will formally adopt the Loch Etive ICZM Plan as supplementary guidance to our existing Local Plan. The process of developing the Loch Etive Plan has benefitted from the Council’s involvement in other marine projects. In addition to the development of a plan, the Council considers that there is great value in discussion of potential issues amongst stakeholders with differing views and agrees that this allows stakeholders to gain insight and a greater understanding of other interests.</p> <p>Comment noted and support welcomed.</p> <p>Comments noted. The Loch Etive Plan does not consider water supply for housing. This is however considered by the Council's Local Plan and ongoing liaison between the Council and Scottish Water. This is a key consideration in any planning application for residential housing.</p> <p>Comments noted. See our response to your comments on Section 1 of the Plan, below.</p>
General	The Crown Estate	The Crown Estate welcomes the opportunity to offer comment on the Loch Etive ICZM Plan.	All comments noted and support welcomed.

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	[Organisation Response 14]	<p>Generally we considered the plan comprehensive in its scope of the coastal activities and interests of Loch Etive, and relatively easy to understand, given the range and nature of topics and issues being addressed.</p> <p>Albeit a brief overview of our thoughts on the Loch Etive ICZM Plan, our impression on the whole is it constituting a well thought through and structured set of proposals for future marine management, stewardship and associated planning policy.</p>	
General	Loch Etive Shellfish Growers Association [Organisation Response 15]	<p>I have been engaged since the start of the formation of the Plan for Loch Etive, and can honestly say that the way this has been managed was excellent. The meetings were well organised, and all stakeholders had the opportunity to express their views. I personally am happy with the draft plan.</p> <p>The process did raise some issues that are not under the control of the stakeholders, but cause them concern. These were mainly to do with access, car parking and toilets. As more people want to use the loch for leisure purposes, these problems will only get worse, so I do hope the Council will consider taking some action to address this.</p>	<p>Comments noted and support welcomed.</p> <p>The Plan recognises that there are concerns from the current level of recreational activity in the area. In terms of parking, access, camping and litter and therefore any improvements to existing infrastructure and opportunities for new facilities will need to be considered carefully in order that recreation does not result in unacceptable impacts on the environment and local communities.</p> <p>To enable improvement of access for recreational facilities and alleviate current access issues the Plan aims to take a strategic approach and assess existing access points in order to identify the need for management and opportunities for access improvements. The promotion of dedicated access points could take pressure off other less suitable locations. The Council will also work with landowners and other stakeholders where appropriate to try and find solutions to individual access issues.</p>
General	Highland Council [Organisation Response 19]	Having already commented on the draft plan at an earlier stage, our comments now (see below) are fairly minor. All relate to the fine detail in the section dealing with Policy Zone 'F':	Comments noted.
General	Argyll District Salmon Fishery Board	The Board welcomes the opportunity to comment on the Loch Etive ICZM. Non statutory Consultees; The list of non-statutory consultees should	Comment noted

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	[Organisation Response 20]	include the Argyll District Salmon Fishery Board, (as it has legislative powers to manage salmon and sea trout within the Loch. The Argyll Fisheries Trust act as advisors to the Board). Well done for pulling all our differing views into a useful and uncontroversial document.	Comments noted. The Plan has been updated to include Argyll District Salmon Fisheries Board as a non-statutory consultee in each policy zone. Comments noted.
General	Celtic Sea Ltd. [Organisation Response 21]	I have gone through the document in detail. I consider this plan as a professional piece of work and think that you and your team have done a very good job. The various stakeholders' interests are reflected in a neutral manner, which is key for such a paper.	Comments noted and welcomed.
General	SEPA [Organisation Response 23]	Thank you for your consultation email of 12 October 2010. We welcome the content of the draft Loch Etive Integrated Coastal Zone Management (ICZM) Plan, and the way in which it has been presented. We have contributed to the development of the draft ICZM plan through a number of routes, including through the Argyll and Lochaber Area Advisory Group (AAG) for river basin planning (RBMP), and we are satisfied that the document reflects our interests in this area. We have some minor comments to make, principally in order provide further clarity on various issues.	Comments noted.
Section 1 - Introduction			
Section 1 - Introduction	Marine Concern (Organisation Response 12)	<p>Comments on the draft report follows:</p> <p>The opening section of the draft ICZM report for Loch Etive states: “The objective of ICZM is to establish integration of their interests and responsibilities” Department for Environment Food and Rural Affairs (DEFRA), 2006</p> <p>ABC Comment - “Marine planning and decision-makingsustainable management of this significant marine area”.</p> <p>We fully agree with the comments in the opening statements, there is however one major cause for concern in the thinking of this and the majority of government lead proposals; namely economic and social activities appear to take precedence over the very core of the proposals; protection of the environment; without the healthy environment there is no or restricted/reduced economic and social activities. Increased population and technical advances have increased pressures on the marine environment and a new approach; from the “environment first” is needed.</p> <p>This approach and wording means that important methods of protection</p>	<p>Comments noted. As this is a Council Plan and aims to be supplementary guidance to our Development Plan it needs to be consistent with and guided by National Planning Policy and Council policy. The Council wants to see economic growth which is sustainable and does not damage the environment. Therefore, the ICZM Plan aims to achieve a balance between the need for economic development of the coast and protection of the environment. The Council considers that the aims and objectives of the Plan (listed in section 1.4) and the resulting guidance throughout the Plan provide an appropriate balance between protection of the environment and economic development.</p> <p>The council recognises that together with its people, Argyll and Bute’s greatest asset is its natural and built environment which needs to be protected and enhanced. Our Local Plan policies and the guidance in the Loch Etive ICZM Plan can help to achieve this by safeguarding key environmental</p>

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		<p>are often left out or forgotten, indeed due to the wording within the document and the format of the ICZM structure, it could be argued should suggestions/trials of environmental protection methods be covered here; as they have been omitted in the polarised commercial view of the Sound of Mull Scottish Sustainable Marine Environment Initiative (SSMEI), it is important that some bearing on Marine Protected Areas, those that include portions of “No-Take” be considered. These areas of no-take if large enough, correctly placed and enforced will allow for marine resource recovery; true sustainability, both of our marine environment and for commercial industry for our future.</p> <p>SSMEI was also held during this time scale, “stakeholder involvement” however took on a very different meaning especially within the so called “Working Group”, where the balance between commercial and environmental groups was polarised in favour of the commercial sector; a common situation in Scottish government lead initiatives. As a result the SSMEI Sound of Mull failed to suggest/mention or even trial the concept of Marine Protected Areas (MPAs), let alone Highly Protected Marine Areas (HPMAs) i.e. those that include areas of “No-Take”. With this in mind and due to the importance of MPAs/HPMAs when considering marine planning and future marine management we feel that it is important to at least have this aspect covered within this final document.</p> <p>An area or several areas representing different interests; habitats/species, should be set aside for the protection of the loch’s ecosystems/habitats/species, in line with the findings of the Royal Commission’s Report “Turning the Tide” these areas should be diverse and spread out, thereby avoiding the destruction of any one species or habitat.</p> <p>Intuitive Thinking; The importance of tidal influences is often overlooked during planning processes; the flood and ebb tide of Loch Etive involves the movement of a large volume of water. The concept of including an area outside of the loch is an example of excellent forward thinking and planning; our only recommendation is that is area should be extended to include Ganavan Sands and the area out to Rubha’ Fion Aird.</p>	<p>assets and guiding new developments to locations that minimise environmental impacts.</p> <p>The Council considers that the ICZM process, developing a non-statutory plan for a relatively small coastal area is not the appropriate process for defining marine protected areas (MPA). It is also not within the power of the Council to designate such areas. The identification of MPAs is currently being assessed strategically by SNH and others at a national and regional level. Section 5.1.2 of The plan discusses ‘Priority Marine Features’ and this section has been expanded to list the features that are known to be present in Loch Etive. It also identifies those features for which a Nature Conservation MPA could be designated.</p> <p>Without MPA designation there are currently areas of Loch Etive that are largely free from development and other activities and the Policy Guidance of the Loch Etive Plan in areas such as the head of the Loch (Policy Zone F) is a presumption against development.</p> <p>Ardmucknish Bay and Dunstaffnage Bay were included within the boundary of the Loch Etive ICZM Plan due to the clear linkages in terms of tide, landscape character, geography and use. The additional areas recommended were considered when defining the project boundary and were not considered appropriate. Extending the boundary to encompass Ganavan Bay was felt to be encroaching too much on Oban and this coastal area is of a different character to the rest of the project area. The area out to Rubha’ Fion Aird was not included as there was no clear benefit and the boundary</p>

Section/ Issue	Individual/ organisation	Comment	Response
			would be extending further out into the more open waters of the Lynn of Lorn.
Section 1 - Introduction	SEPA [Organisation Response 23]	<p>Sections 1 to 3</p> <p>We welcome the draft plan and the fact that the Water Framework Directive (WFD) and river basin planning are integral to it. We find the draft plan to be very comprehensive and useful, and complementary to the aims and objectives of the river basin planning process. The draft plan is very well prepared, reflecting the changes taking place under the Marine (Scotland) Act 2010, and sets out a holistic approach that ties in all the major user groups within the vicinity of the water body. It is fully supportive of recent initiatives which are being promoted by the Scottish Government as well as acknowledging existing planning and other policy guidance. It has also taken recent advances in scientific research into various local issues in Loch Etive into account and incorporated the findings of these into the draft plan. The work being taken forward to move the plan onto GIS will also prove extremely useful.</p> <p>The inclusion of <u>Policy LE INNS1 – reducing the risk from marine invasive non-native species</u> is to be commended. We also welcome the recognition of marine litter and measures to deal with what is clearly an environmental issue, although marine litter is not directly recognised by the WFD which sees litter as an aesthetic issue only until monitoring shows an impact on ecological status. Prevention and solutions to the issue of marine litter are needed before this becomes the case.</p> <p><u>Section 1.3 Integration with other plans and processes</u></p> <p>In the diagram on page 8, we suggest that an arrow is added from the European Directive box to the Scottish River Basin Management Plan (Argyll and Lochaber Area Management Plan) box to show the links between the WFD and river basin planning and to demonstrate that the latter is a requirement of the WFD.</p> <p>We also suggest that the brackets are removed to read “<i>Scottish River Basin Management Plan - Argyll and Lochaber Area Management Plan</i>”. This also applies elsewhere in the document where references should be made to the “<i>Argyll and Lochaber Area Management Plan</i>” and the “<i>Argyll and Lochaber Area Advisory Group</i>” rather than, for example, to the Argyll Area Advisory Group.</p>	<p>Comments noted and support welcomed. It is hoped to have the information provided in the Plan available through an online GIS application, which will allow users to view layers of information linked to the guidance in the Plan.</p> <p>Comments noted and support welcomed. Section 5.5.2 has been amended to include information about the proposed Scottish Government Litter Strategy which will have links to the Marine Strategy Framework Directive.</p> <p>Comments noted. The Integration with other Plans and Policies schematic has been revised appropriately.</p> <p>Comments noted. Changes have been made throughout the Plan.</p>

Section/ Issue	Individual/ organisation	Comment	Response
Section 3 – Guide to using the Loch Etive ICZM Plan			
Section 3 – Guide to using Plan	SNH [Organisation Response 3]	<i>Q1. Is this section easy to understand and are there any improvements that could be made?</i> Yes the section is easy to read and no we don't believe any improvements are required.	Comments noted.
Section 3 – Guide to using Plan	The Crown Estate [Organisation Response 14]	Found this well presented and easy to understand.	Comments noted.
Section 3 – Guide to using Plan	Individual [Response 17]	I found Section 3 of the Plan to be straightforward and easy to understand.	Comments noted
Section 4 – General Policies			
Section 4 – General Policies	SNH [Organisation Response 3]	<i>Q2. Do you have any comments on the General Policies?</i> See general comments on promoting and interpreting Loch Etive and the potential effect this may have on the wild and remote nature of the loch if this is not carried out appropriately.	Comments noted. See our response to SNH comments under 'General' above.
Section 4 – General Policies	Historic Scotland [Organisation Response 11]	I welcome that the plan seeks to protect and where appropriate enhance the historic environment. Section 4 of the plan presents two general policies which have been developed to provide an over-arching policy framework for the Loch Etive ICZM Plan. I note that these will apply to all sectorial development and activities. I welcome that that Part C of Policy Le Gen – Development and Activity aims to enhance the natural and historic environment.	All comments noted.
Section 4 – General Policies	Marine Concern [Organisation Response 12]	Two general polices have been developed as an overarching policy framework for the Loch Etive ICZM Plan. These must be given due consideration by all interests to ensure the use of the area is sustainable. <i>'The inclusion of the ICZM process into a policy framework, one to be considered by all parties is welcomed. There is however a potential for future failings without the term, "sustainable" being defined. The inclusion of sustainable for who or what and over what timescale would be beneficial'.</i>	Comments noted. The Loch Etive ICZM Plan uses the same definition of 'sustainable development' as used in the Council's Local Plan which is ' <i>Development that meets the needs of the present without compromising the ability of future generations to meet their own needs</i> '. This definition is included in the Plan Glossary.
Section 4 – General Policies	The Crown Estate [Organisation Response 14]	Only comments here were that the inclusion of reference to community development and socio-economic aspiration are welcome in 'setting out a stall' for development assessment criteria.	Comments noted. It is important to promote, where appropriate, sustainable growth that is in line with the needs and aspirations of local communities.

Section/ Issue	Individual/ organisation	Comment	Response
Section 4 – General Policies	Individual [Response 17]	The General Policies appear to be satisfactory.	Comment noted.
Section 4 – General Policies	SEPA [Organisation Response 23]	<p>Section 4 – general policies</p> <p>In general the policies are very well laid out and clear in their intention. We make one recommendation for amendment and additional wording to further clarify the general policy <u>Policy LE GEN1 – Development and activity</u>. In part B “other development requirements” we would recommend the rewording of the second bullet point to read “<i>ensure no deterioration of water body status under the Water Framework Directive and facilitate improvements to water body status wherever possible.</i>”</p>	Comments noted. Policy LE GEN 1 has been amended as recommended.
Section 5 – Cross Cutting Environmental Themes			
Section 5 – Cross Cutting Environmental Themes (General)	The Crown Estate [Organisation Response 14]	<p>The structure of this section was good. Comments on the various themes:</p> <p>(i) Natural heritage – thought the recommendations were practical and identifiable</p> <p>(ii) Wild migratory salmonids – good overview but would suggest that recommendations include requirement for AMA dialogue participation by both wild and farmed salmonid interests (aware that AMA’s appear in the aquaculture activity policy, but good to encourage engagement from both sides).</p> <p>No comments on the other themes – all seemed fine.</p>	<p>Comments noted.</p> <p>Suggested recommendation added to section 5.2.3.</p> <p>Comments noted.</p>
Section 5 – Cross Cutting Environmental Themes (General)	Individual [Response 16]	<p>In 5.1.3 Tide-swept communities: The tide runs at about 20 knots on spring ebb at the Falls of Lora. Your cover photograph shows an example.</p> <p>In 5.5 The pollution caused by agricultural rain water run-off bringing raw dung into the loch seems to be being “swept under the growing carpet”! This may explain why the growing water is failing guideline standards.</p>	<p>Scientific papers and other reports have identified tidal speeds of 6-8knots. The Falls of Lora website states that SAMS have recorded a maximum speed of 12 knots from a flow meter on the seabed.</p> <p>Diffuse pollution was identified as the biggest source of bacterial contamination in Loch Etive and this issue is acknowledged in the Plan (section 5.3). Local remediation was initiated by SEPA to address problem areas and improvements made. However, current monitoring results of the Shellfish Growing Water do not appear to reflect improvements that can be directly attributed to this work. SEPA are working with the agriculture industry to promoting agricultural Best Management Practices and adherence to the diffuse pollution General Binding Rules under the</p>

Section/ Issue	Individual/ organisation	Comment	Response
Section 5 – Cross Cutting Environmental Themes (General)	Marine Concern [Organisation Response 12]	<p>Fig 5.2 Shows a seal haul out in the upper basin. <i>The fig. Fails to show the haul outs on the islands at the Kilmarnonaig Narrows; there is also an occasional haul out on the south and south western tip of Eilean Duirinnis.</i> <i>There are two salmon river icons at Bonawe Narrows, only one river there, River Awe, on the southern shore.</i></p> <p>The following addresses the sections covered generally: Angling, access and rubbish; <u>Some</u> anglers (it is noted that this only refers to some, but the level of abuse, damage to property and large amounts of rubbish is cause for concern) have and continue to cause much distress to some local people. Some may see “angling” as an excuse for a booze session which may extend over several nights. Camping and the associated problems including excreta, exposure of body parts and rubbish has been highly problematic and on occasions has resulted in a Breach of the Peace situation developing. The police have been called to several incidents on the north shore. Access is covered later.</p>	<p>Controlled Activities Regulations.</p> <p>Comments noted. Figure 5.2 aims to show only haul-out sites that are frequently used by at least 5 seals. The site at Inverliver is the only haul-out identified by the Sea Mammal Research Unit and SNH. The text in section 5.1.3 describing marine mammals has been changed to reflect the fact that seals are also regularly sighted feeding in and around the narrows at Connel, Kilmarnonaig and Bonawe. Within the relevant policy zones, the use of less frequently used areas as seal haul-outs has been identified under the biodiversity heading and in Policy Zones B and D. The additional salmon river icon is a map error and has been removed.</p> <p>Comments noted. These concerns have been expressed by other local residents in other parts of Loch Etive. Section 6.3 of the Plan recognises these issues and that a minority of recreational users behaving irresponsibly can have significant effects on local residents and other users. The Plan promotes adherence to good practice such as codes of conduct and guidance on acting responsibly in the Outdoor Access Code.</p>
Section 5 – Cross Cutting Environmental Themes (General)	SEPA [Organisation Response 23]	<p>Section 5 – cross cutting environmental themes This section is very comprehensive, clearly showing the wider context and interconnections between various activities and policy interventions. In the interests of clarity we make the following recommendations for amendments and additional wording:</p> <p><u>Section 5.1.1 – Designated sites</u> Add Loch Etive and Lynn of Lorn shellfish growing waters to the list of designated sites.</p> <p><u>Section 5.2.1 – Factors affecting migratory fish populations</u> Remove <i>Argyll Fisheries Trust 2009</i> reference at the end of the last sentence (page 27). The reference here should be to the Argyll and</p>	<p>Comments noted.</p> <p>The Shellfish Growing Waters have not been added to Section 5.1.1 as they are not designated sites for natural heritage interests i.e. habitats, species or landscape. These sites have been discussed and are mapped in section 5.5 (Water Quality) and in the relevant Policy Zones (section 7)</p> <p>Comments noted. This reference has been amended appropriately.</p>

Section/ Issue	Individual/ organisation	Comment	Response
		<p>Lochaber River Basin Management Plan and therefore the reference in brackets should be “Argyll and Lochaber Area Management Plan”.</p> <p><u>Section 5.4.2 – Species already established – common cord-grass</u> Before the last sentence add “<i>This is recognised by the WFD classification for the Firth of Lorn water body (which includes this area) and has been downgraded from high to good ecological status due to the presence of common cord-grass</i>”.</p> <p><u>Section 5.4.4 – Existing management and controls</u> Under <u>Plans, Projects and Strategies</u>, add a reference to the <i>River Basin Planning Invasive Non-Native Species Supplementary Plan</i> which is being prepared through a national advisory group involving SEPA, SNH, Marine Scotland, LINK (represented by RSPB), and Scottish Government. The plan will tackle the issue of INNS and will be available in early 2011.</p> <p>While the Argyll INNS Forum is mentioned elsewhere in the document, it would be useful to insert a reference to it in this section to complete the suite of existing plans, projects etc.</p> <p><u>Section 5.5.3 – Water quality for shellfish growing</u> In the second paragraph reword the last sentence which is now out of date to read – “<i>As part of the ongoing national diffuse pollution campaign, SEPA and partner organisations are promoting agricultural Best Management Practices and adherence to the diffuse pollution General Binding Rules (GBRs) under the Controlled Activities Regulations (CAR)</i>”. Reference to developing new diffuse pollution GBRs should be deleted as this work has now been completed.</p> <p><u>Section 5.5.5 – Current water quality status of Loch Etive</u> Loch Etive is classified as a transitional water body rather than coastal; the second sentence should be reworded to read – “<i>Loch Etive itself is a transitional water body which is classified as being at good ecological status. Ardmucknish Bay and the west of the project area is within the Firth of Lorn (North) water body which is classified as moderate ecological status, but is predicted to improve to good status by 2015 or sooner subject to classification reviews</i>”.</p> <p>Information about the fresh water around the loch could be added for</p>	<p>Comments noted. Section 5.4.2 has been updated to include this statement.</p> <p>Section 5.4.4 has been updated with the text mentioned here.</p> <p>Comments noted. A short paragraph detailing the aims of the Argyll and Bute Invasive Species Forum has been inserted to section 5.4.4.</p> <p>Section 5.5.3 – This paragraph has been updated as suggested.</p> <p>Comments noted. This information has been included in section 5.5.5.</p> <p>Comments noted. We consider that it is useful to include</p>

Section/ Issue	Individual/ organisation	Comment	Response
		<p>completeness to show the freshwater influences. If this is considered appropriate the following text could be added – <i>“There are a number of rivers flowing into Loch Etive which could influence its water quality. The River Etive and the other tributaries are at good ecological status with the exception of Allt Nathais which is high ecological status, Allt Easach and Abhainn Dalach which are at moderate ecological status and the River Esragan which is at bad ecological status”.</i></p> <p><u>Section 5.6.2 – Coastal flooding</u> For clarity and to use its correct title, the first sentence of the second paragraph should be modified to read <i>“SEPA have developed the Indicative River and Coastal Flood Map (Scotland) which identifies areas of coast that are at risk of flooding from the sea”.</i></p>	<p>information on the current ecological status of the freshwater influences, which has been added to section 5.5.5.</p> <p>The first sentence of the second paragraph, Section 5.6.2 – Coastal flooding has been modified as mentioned here.</p>
Section 5.1 – Natural Heritage Interests	Individual [Response 17]	<p><i>Section 5.1.1:</i> As you will no doubt be aware, the proposed Golden Eagle SPA has now been confirmed.</p> <p><i>Sections 5.1.5 and 5.1.8:</i> Access to the bird records of Argyll is available through the County Bird Recorder; contact details are available on the Argyll Bird Club website at http://www.argyllbirdclub.org/bird_rec/bird_recorder.asp In addition to this comprehensive record of all bird species which have occurred in Argyll the waterfowl and waders using lower Loch Etive in winter have been surveyed since 1983 for the Wetland Birds Survey (WeBS) which is hosted by the British Trust for Ornithology on behalf of the WeBS partners (BTO, RSPB, Joint Nature Conservation Committee and the Wildfowl and Wetlands Trust). For access to WeBS data please refer to the WeBS website at http://blx1.bto.org/websonline/</p> <p>Insert additional bullet: “Loch users are encouraged to report bird sightings to the County Bird Recorder. Contact details can be found in Appendix IV.” Add the appropriate reference to Appendix IV.</p>	<p>Comments noted. Figure 5.1, section 5.1.1 and Policy Zone F have been updated appropriately.</p> <p>Comments noted and information sources welcomed. The Council had been in liaison with Clive Craik, Paul Daw and Andy Robinson from RSPB in relation to bird records. The County Bird Recorder and WeBS website have been included as information sources under section 5.1.5.</p> <p>Comment noted and added to section 5.1.8. Appendix IV has been updated appropriately.</p>
Section 5.1 – Natural Heritage Interests	Individual [Response 2]	Page 22 map page. Airds Bay is used by many species of wading birds but this is not mentioned on this map although it is covered on page 110.	Comment noted. Wading bird populations in Airds Bay have been added to the Council data set and displayed on Figure 5.2 and the relevant Policy Zone D map.
Section 5.1 – Natural Heritage	SNH [Organisation Response 3]	<p>Q3. Do you have any comments on the environmental themes and recommendations?</p> <p>P.23 The draft Priority Marine Features (PMFs) are mentioned here but no</p>	Comment noted. The Priority Marine Features (PMF’s)

Section/ Issue	Individual/ organisation	Comment	Response
Interests		<p>specific mention is made of the ones that occur in Loch Etive because the list hasn't been finalised. It may be some time before the list is finalised, the draft list could be quoted in the meantime.</p> <p>P.24 There is no mention of the landscape character assessment work commissioned this year in the Consultative Draft Plan. The SEA Environmental Report said the final report from Alison Grant isn't ready yet but initial findings were taken into account in the SEA and the final report will be taken into account when it is ready but other consultees who have not read the SEA may not be aware of this.</p> <p>P.25 Bullet points in 5.1.7 and 5.1.8 appear to be in conflict, either the aim is to promote and interpret Loch Etive or to preserve its wild and remote character.</p> <p>There is a set of recommendations at the end of the discussion of each of the "Cross cutting Environmental Themes" (for example section 5.4.6, P.34 for Invasive Non Native Species). It is not clear who these are aimed at and we feel the vast majority are too aspirational. We suggest the recommendations are presented as a "wish list" and the ones that can realistically be delivered are picked out and attributed to specific organisations or individuals.</p>	<p>including the draft PMF's for Loch Etive have been included under section 5.1.2 Priority Marine Features (PMF's).</p> <p>The Council is still waiting for the final draft report for the additional landscape work carried out by SNH this year. An early draft report did inform the assessment of potential for aquaculture development in relation to the landscape, alongside the original 2006 report by Alison Grant. Section 5.1.4 has been updated to make reference to this additional landscape work and as soon as a final report is received it will be made available to view from the Council website.</p> <p>Comments noted. The aim of the Plan is both, as not all parts of Loch Etive and wild and remote. These points are only in conflict if the plan is promoting inappropriate access to and interpretation of areas which have a wild and remote character. Opportunities for future use in Policy Zones E and F have been reviewed and amended to ensure this is not the case. Education and/or interpretation can raise awareness of and understanding of natural heritage interests and their sensitivities and therefore aid conservation and preservation.</p> <p>Comments noted. Recommendations are aimed at marine and coastal users, developers and regulators. We agree that some recommendations are aspirational but do not consider this to be a problem. Other organisations are supportive of the recommendations in section 5, including wild fish interests, Historic Scotland, SEPA and The Crown Estate. Recommendations in section 5 and 6 of the Plan have been reviewed and a small number have been incorporated into the General Policies, incorporated into other text or removed altogether. Recommendations that are a priority for delivery are reflected in the Action Plan where they are attributed to specific organisations.</p>
Section 5.2 – Wild Migratory Salmonids	Argyll District Salmon Fishery Board [Organisation	5.2 Migratory Salmonids 2 nd para, 5 th line down, AFT has agreed deletion from 'fisheries' through to the next sentence, placing a full stop after 'fisheries' as this insertion was overlooked in a cut and paste exercise.	Comment noted. Section 5.2 has been revised.

Section/ Issue	Individual/ organisation	Comment	Response
	Response 20]		
Section 5.3 – Archaeological and Historic Sites	Historic Scotland [Organisation Response 11]	<p>Section 5.3 identifies archaeological and historical sites in the policy zones and Table 5.1 lists some of the most important coastal features. Section 5.3.5 recommends improving access to and promoting historic sites which are currently accessible and the enhanced management and/or interpretation of scheduled monuments. As we have previously indicated, Historic Scotland welcome this approach and the opportunities it could bring for greater public accessibility to and promotion of cultural heritage sites in Argyll and look forward to developing joint interpretation and tourism strategies and discussing specific site proposals with you as they come forward.</p> <p>Section 5 of the plan discusses a number of cross-cutting environmental themes and this includes recommendations that promote their understanding, consideration and protection. I welcome that this recognises the potential impact on the historic environment from such factors.</p>	Comments noted and support welcomed.
Section 5.4 – Invasive Non Native Species	Individual [Response 2]	Page 31 5. 4. 2. It would be great to make mink control at a level that would lead to eradication.	Comment noted.
Section 5.4 – Invasive non-native species	Argyll Fisheries Trust [Organisation Response 8]	p33 – could you include the url for our Biosecurity Management Plan. http://www.argyllfisheriestrust.co.uk/pdfs/argyllbiosecurityplan.pdf	Comments noted. The Plan has been updated to include this weblink.
Section 5.4 - Invasive non-native species	Marine Concern (Organisation Response 11)	<p>Invasive Non-Native Marine Species (INNS)</p> <p>Knotweed; is an increasing problem especially on the north shore, failure to eradicate it has allowed its spread. It is now prevalent up to the Bonawe Narrows. Knotweed is transforming the loch side appearance, competing against naturalised species and preventing access to the loch from the roadside.</p> <p>Quarry and increasingly forestry extraction by sea loch may add to INNS to the Loch. Strict measures to ensure emptying of ballast waters prior to entering the loch must be observed, and checked.</p>	<p>Section 5.4.2 of the Plan identifies this problem and this section has been updated in light of these comments.</p> <p>Some marine INNS can be spread via ballast water and vessels visiting the head of the Loch for timber extraction and for transport of materials from Bonawe Quarry will increase the risk of spread or introduction of INNS. While there are strict measures relevant to the discharge of ballast water these relate to vessels that have entered UK waters</p>

Section/ Issue	Individual/ organisation	Comment	Response
		<p>Rhododendrons; May be an INNS, but care should be exercised when considering clearing, due to their excellent protective cover for larger mammal species such as deer and otter, and for their excellent bee attraction status. This is imperative especially in built up areas, if we wish to continue seeing iconic mammal species, and possibly even avert the current decline in bees, that stands are left for cover, even “islands” of cover as opposed to complete removal.</p> <p>Mink; Are a continuing problem; we would disagree with the comments regarding low numbers. The mid loch has a problem which has not been able to eradicate.</p>	<p>from International waters. The vessels visiting Loch Etive have traveled from within Scottish inshore waters and there is therefore no official guidance that can be applied here. The Council will discuss this further with Marine Scotland and SNH.</p> <p>Comments noted.</p> <p>The Plan (section 5.4.2) does not state that mink are present in low numbers and identifies that mink control has only been carried out in some locations but not at a level that might lead to eradication or control of this species. The Plan (section 5.4.6) recommends that measures to reduce the mink population should be funded and supported by the relevant agencies where appropriate.</p>
<p>Section 5.4 – Invasive Non Native Species</p>	<p>Argyll District Salmon Fishery Board [Organisation Response 20]</p>	<p>5.4.3 Parasites <i>Gyrodactylus salaris</i>; (GS). Prevention of this parasite entering Scotland is so important that we suggest that the potential vectors should be listed for guidance.</p> <ol style="list-style-type: none"> 1. It should be assumed that GS is present in all European Countries and endemic in Scandanavia. Precautions should be taken, particularly by those returning from those countries. 2. GS is a freshwater parasite and cannot thrive in sea water, meaning that it is most likely to be spread by wet equipment such as felt soled waders or wetsuits, fresh water inadvertently left in well boats or canoes and imported, untreated fish eggs. 3. Guidance on prevention is available from the Scottish Government web site. www.infoscotland.com/gsbug. 4. Anyone coming from European countries that have used rivers or lakes should take the following precautions. <ol style="list-style-type: none"> a) Dry equipment at a minimum of 20 degrees C for at least two days b) Heat for at least 1 hour at temperatures of above 60 degrees C c) Deep freeze for at least one day 	<p>Comments noted. The guidance points have been added to section 5.4.3.</p>

Section/ Issue	Individual/ organisation	Comment	Response
		d) Immerse in a solution suitable for killing GS, (Virkon/Wescodine/Aquatic at 1% dilution) sodium chloride (3%) sodium hydroxide (0.2%) for a minimum of 10 minutes.	
Section 5.5 – Water Quality	Individual [Response 2]	Page 36 5. 5 3. The investigation was carried out by the SARF. It is surprising they don't mention the chemical and other pollution caused by the waste from underneath the fish cages but refer to agricultural waste only. Nor does there appear to be any mention of this anywhere in the report other than fallowing of sites?	Comments noted. This study assessed the risk factors associated with cultured shellfish and focussed on E.coli non-compliance issues within the Loch Etive shellfish production areas. Effluent from fish farming was not considered to be a risk factor to shellfish growing and therefore not considered in this report. Section 6.1.4 of the Plan specifically mentions the effects of fish farms on water quality and the seabed, which are regulated by SEPA under the Controlled Activities Regulations. Section 5.5.2 also mentions the release of nutrients and waste materials from fish farming.
Section 5.5 – Water Quality	Dawnfresh [Organisation Response 10]	P39 – “shoreline debris and litter” – (1) While litter from Aquaculture can be a potential issue the surveys conducted during the consultation process indicated that it actually made up a very small proportion. The implication within this paragraph is slightly negative towards Aquaculture. Our suggestion would be rephrase this sentence to indicate the potential problem litter sites had been identified where litter (whether of Aquaculture or general origin) would accumulate. (2) Typo “for” instead of “from”.	Comments noted. Agree that this Local agreement did not read well and it has been amended accordingly in light of these comments.
Section 5.5 – Water Quality	Scottish Water [Organisation Response 13]	<p>Scottish Water welcomes the opportunity to comment on the aforementioned consultation paper, and offers the comments provided below. We appreciate the inclusion of recent Scottish Water investment to improve point source discharges from the settlements around Loch Etive.</p> <p>In response to Question 3, our response is as follows: Item 5.5.1 notes local concerns about water quality in Loch Etive and item 5.5.7 makes recommendations for water quality, both these items are related to infrastructure restrictions on connection to the public sewer in Connel. Scottish Water would highlight that if existing private discharges are of concern to Argyll & Bute Council Environmental Health team, then this would be a matter for SEPA to consider. Future developments may connect to the public sewer in accordance with Sewers for Scotland standards, at the developers cost with a contribution from Scottish Water.</p>	<p>Comments noted.</p> <p>Comments noted. Statement about connecting to public sewer in accordance with Sewers for Scotland standards has been added to section 5.5.2.</p>

Section 6 – Activities and Infrastructure

Section/ Issue	Individual/ organisation	Comment	Response
Section 6 – Activities and Infrastructure (General)	The Crown Estate [Organisation Response 14]	<p>Again thought the structure of this section was clear. With respect to comments on selected activities addressed:</p> <p>(i) Aquaculture – very well dealt with in our view, and would comment as follows -</p> <p>a. The more ‘holistic’ view of planning for development with regard to rationalisation of used or unused capacity, consolidation etc, is welcomed. We would encourage the consideration of ‘net benefits’ in the assessments of any such proposals</p> <p>b. We are pleased to see reference to polyculture and macro-algae. While the benefits that can be accrued from such activities are increasingly acknowledged, planning will be the key to their manifestation.</p> <p>c. Pleased to see policy on encouragement for re-use/relinquishment or consolidation of unused sites/capacity, especially if this can be done to add weight to compliance with other development policies of the plan. Highlighting the issue may well serve to focus opportunities arising from the presence of such unused capacity.</p> <p>d. In respect of point (c) above and/or abandoned equipment, The Crown Estate will be pleased to offer what assistance it can in this regard. While we have a policy of not automatically revoking unused sites as this will simply diminish capacity for which more productive use may exist through measures indicated (although obviously the advent of permanent planning consents will change this, as capacity is retained), we will pursue leaseholders that have abandoned sites to observe their obligations for removal, where instances are made known to us.</p> <p>e. Agree with all aquaculture recommendations. Our view is that they are appropriate and inclusive to the fostering of responsible local marine management practices and stewardship.</p> <p>(ii) Marine Recreation – sensible and practical recommendations. One observation is that through improved communication between various interests in the loch, greater opportunities for positive interaction might accrue, to the benefit of all. For example fish farm shore-bases may be able to provide access facilities to recreational interests, subject to agreed practices, safety measures and I daresay insurance, but may nevertheless represent a practical accessibility solution (quite possibly already done by many).</p>	<p>Comments noted and support welcomed.</p> <p>Comments noted. The Council agrees that 'net benefits' should be considered and a sentence to reflect this has been added to Policy LE AQ1.</p> <p>Comments noted. Agree that it will be important for planning to recognise the benefits from these types of culture.</p> <p>Comments noted. The Council recognises that the greatest opportunity for increased production in Loch Etive is through consolidation and/or swapping of existing used and unused sites. The planning system needs to be flexible to allow such changes to happen.</p> <p>Comments noted. The Council will be sure to liaise with The Crown Estate over any future issues of abandoned sites and over any industry proposals that may involve interest in unused sites.</p> <p>Comments noted and support welcomed.</p> <p>Comments noted. The Council also hopes that this improved communication both during the development of the Plan and through the integration of interests within the Plan will lead to opportunities for positive interactions and shared benefits from future development. Some aquaculture companies do not wish to share infrastructure due to health and safety and disease and hygiene risks whereas some other companies allow informal use of infrastructure at individual sites.</p>

Section/ Issue	Individual/ organisation	Comment	Response
		(iii) Coastal & Marine Infrastructure - pleased to see inclusion of policies in respect of protection of shellfish interests, and also proposals for promoting sea-borne transport of goods where possible. See point above re access – possibilities regarding shared access with Council interest incorporated to provide some assurance to private interests – possibly too ambitious?	Comments noted. Not sure about Council involvement to provide assurance to private interests but will keep under consideration.
Section 6 – Activities and Infrastructure (General)	SNH [Organisation Response 3]	<p><i>Q4. Do you feel this section provides an accurate background to each activity, including economic value, potential impacts/conflicts and future development?</i> Yes.</p> <p><i>Q5. Do you agree with the recommendations on the future use and management of Loch Etive?</i> P.73 We agree that large scale tidal renewables projects are inappropriate for Loch Etive. A thorough assessment of any small scale developments would be required in Policy Zone B given the special nature of the Falls of Lora. P.76 6.8.5 Recommendations bullet doesn't make sense.</p> <p><i>Q6. Do you have any comments on the Activities Policies?</i> POLICY LE INF1 – COASTAL AND MARINE INFRASTRUCTURE DEVELOPMENT - See general comments on promoting and interpreting Loch Etive and the potential effect this may have on the wild and remote nature of the loch if this is not carried out appropriately.</p>	<p>Comments noted.</p> <p>Comments noted. The special nature of the Falls of Lora would be a particular consideration in any small scale development proposal which would have to be consistent with the General Policies in this Plan and the environmental policies in the Councils current Local Plan.</p> <p>This recommendation has been reworded.</p> <p>Comments noted. This policy has been amended slightly.</p>
Section 6 – Activities and Infrastructure (General)	Individual [Response 16]	<p>In 6.3.7 One problem we have is anglers and others leaving vehicles parked in passing places and left there. If double yellow lines could be painted at the verge in these important passing places, the drivers would be more aware of the law.</p> <p>Further in 6.3.7 The wash from a semi displacement power boat of about 35' length doing 12 knots is going to be more of a hazard to other users of the loch than that of a 150' coaster doing 7 or 8 knots.</p> <p>In 6.3.10 The Council owned car park at Achnaba Kirk could be developed to improve access to the loch over the privately owned land above the shore. And there are drains for toilets at this site, and vacant unused land for a small building.</p>	<p>Comments noted. Use of parking places has been included under section 6.3.7 and the suggestion of painting double yellow lines at the verge at passing places will be passed on the Council roads department.</p> <p>Comments noted. This identified conflict has been removed from the Plan.</p> <p>Comment noted and suggestion welcomed. This option will be considered in more detail by the Marine and Coastal Development Unit and if appropriate, would meet the access needs identified by divers and kayakers on the north shore in Policy Zones C and D.</p>

Section/ Issue	Individual/ organisation	Comment	Response
		<p>In 6.4.1 The timber shipment is expected to be about 600 tonnes a week from Glen Etive.</p> <p>In 6.4.2 The “MV Amanda” is 86m long. Vessels of 3.4 m draught can exit the loch at low water.</p> <p>In 6.6.2 500 cattle producing say 1.5 kg of dung per day = 273750 kg of raw sewage which is washed into Loch Etive and what the sheep produce.</p>	<p>Comment noted and section 6.4.1 has been revised.</p> <p>Comment noted and section 6.4.2 has been revised.</p> <p>Comments noted. See our response to your comments on section 5.5 above.</p>
<p>Section 6 – Activities and Infrastructure (General)</p>	<p>Individual [Response 17]</p>	<p>Q4 - I think the Plan provides a reasonable summary of the current activities in the loch.</p> <p>Q5 & 6 - <i>Section 6.3.10, Sailing</i>: “...visitor moorings at Taynuilt might encourage more local or visiting leisure boats to go up the loch.” It is not clear what economic benefit would be gained from this as, apart from the Bonawe Furnace, there is little reason to go ashore as the shops and hotel are some distance away. On the other hand, increased boat traffic into the loch will increase the risk of importing INNS such as the Japanese Skeleton Shrimp which is known to occur in Dunstaffnage Bay: it is unrealistic to expect boats to be lifted out and scrubbed off before entering Loch Etive.</p> <p><i>Section 6.8, Marine Science</i>: It is disappointing that the Plan does not include any policies regarding the continuation or development of marine science. As can be seen from the description of the existing activities and facilities marine science forms an important part of the local economy and it is not clear why this particular economic activity should not be the subject of specific policies when so many others are.</p> <p>Section 6.8.4 refers specifically to proposals for future scientific research which must be within the general policy detailed in section 4. This does not appear to give any protection to the continued development of the marine science capability within the local economy with respect to any proposals for other developments which may conflict with it. A presumption in favour of future marine science developments should</p>	<p>Comments noted.</p> <p>Comments noted. Taynuilt Pier is just over a mile from the village shops, which while not close, should not be too far for visitors to walk. According to the case study for Loch Etive looking at the economic value of sea angling in Scotland, anglers visiting the area do spend money in Taynuilt (provisions and meals). In relation to INNS, it is considered that a small number of visitor moorings in Airds Bay are unlikely to significantly increase the risk of importing INNS over and above the current level of visiting recreational and commercial boat traffic entering the loch.</p> <p>Comments noted. Marine Science is indeed of significant economic importance both locally and within Argyll and Bute, which is reflected in the Council’s Economic Development Action Plan. The EDAP includes a key priority to ‘assist partners to progress their plans for the development of SAMS, UHI, the Marine Science Park and the proposed development of the wider Dunbeg area’ under the Argyll Marine Science Initiative. This has now been reflected in Section 6.8 of the Plan.</p> <p>The Council had a meeting with SAMS during the consultation period and following this meeting SAMS made a decision not to make a formal response to the consultation as they were happy with the content of the Plan. A policy for Marine Science was considered by the Council, but it was not felt to be necessary in addition to the General Policies and</p>

Section/ Issue	Individual/ organisation	Comment	Response
		somehow be included in the Plan.	<p>Policy Guidance in the Policy Zones.</p> <p>An additional point has been added to the General Policy (LE GEN 1) to include the requirement for future developments, to consider effects on areas used for Marine Science. In relation to support for future marine science developments, such proposals are likely to meet many of the criteria listed in Part D of the General Policy (LE GEN 1).</p>
Section 6.1 – Aquaculture	Individual [Response 2]	<p>Page 46 The following is just a personal comment but the only two sea trout I caught in Airds Bay last year were so covered in sea lice that they would not have survived.</p> <p>Page 46 Predator control. You mention the European otter as being a priority species in the loch but no mention is made as to what might happen to an otter if one got too near the fish cages or if they get caught in fish farm mink traps?</p> <p>Page 48. "Fish farmers would be happy to farm as far up the loch as possible" What an appalling tragedy that would be if it was allowed to happen, for so many reasons, several of which your report covers on pages 62 and 75. The environmental damage that could ensue could be enormous not least ancient deep water sediments covered with fish farm waste? (All future cages should be sited on land anyway).</p>	<p>Comment noted. Wild fish can pick up sea lice both naturally from the wild and also from fish farms. Wild fish entering Loch Etive could well come into contact with salmon farms prior to entering the loch.</p> <p>Comments noted. European otters are a European Protected Species and it is illegal to:</p> <ul style="list-style-type: none"> • deliberately or recklessly kill, injure or take (capture) an otter • deliberately or recklessly disturb or harass an otter • damage, destroy or obstruct access to a breeding site or resting place of an otter (i.e. an otter shelter) <p>Dawnfresh have confirmed that otters have not been caught in mink traps, but if they were by accident then they would be released without injury.</p> <p>Comments noted. Solely from a practical point of view, the upper loch is attractive to trout farmers due to its low salinity which is perfect for growing trout and reduces the presence of sea lice. Future farming of fish may well move on land in the future and has been looked at in the past, but this is not currently economically viable on a large scale.</p>
Section 6.1 - Aquaculture	Celtic Sea Ltd. [Organisation Response 21]	With regard to aquaculture your paper is giving a good overview. I assume there will not be much movement on the shellfish side during the coming 1-2 years until the <i>Trossulus</i> problem has been sorted. As regards to future finfish farming developments, I would like to be involved in detail.	Comments noted. The Council does not anticipate any shellfish development during the <i>trossulus</i> eradication programme and will ensure Celtic Sea is consulted on any planning applications for shellfish or finfish development in the loch.
Section 6.1 – Aquaculture	Argyll District Salmon Fishery Board	Potential Impacts :- throughout the main and zone documents ‘Potential Impacts’ refer to new salmon and trout farms increasing the risk of interaction between farmed and wild salmonids from ‘disease and	Comments noted. Additional text has been added to section 5.2.1 and this information is referenced in the table in section 6.1.4.

Section/ Issue	Individual/ organisation	Comment	Response
	[Organisation Response 20]	<p>escapes’ or’ interbreeding or competition’(6.1.4.) .</p> <p>We suggest that to clarify this, reference should be made in the main document that, in the case of rainbow trout, the impact of escapes is limited to competition for habitat/food and once entering Rivers, escapees become a management issue that may impact on the value of the fishery. The dangers of interbreeding between wild and farm fish is not an issue with rainbow trout as it is a non-native species and there are no known sustainable populations in Scotland. In the case of salmon, containment of farm fish is crucial in preventing genetic dilution from the interbreeding between adult wild fish and escaped farm fish or from salmon smolts returning as salmon from their migratory phase. It may be appropriate to insert this as descriptive paragraph in 5.2.</p> <p>6.1.4 Existing Management and Controls for Finfish Aquaculture (Page 46. Para 7.)</p> <p>From time to time there have been incidents of lice on farmed trout in Loch Etive. We suggest amending the last sentence to read ‘Sea lice are not currently considered to be a problem on trout farms and sea lice treatments have not been used, although as a precaution, SEPA discharge consents for lice treatments are in place on the majority of farms in Loch Etive’. Operators have indicated their intention to apply for lice treatments for the remaining farms as consents are updated. (agreed with John Carmichael, Dawn Fresh)</p> <p>Page 48: Para 2, Trout Farming</p> <p>We suggest a change in wording in the 2nd line to’ there is a reduced risk for chemical bath treatments....’</p>	<p>See comments above.</p> <p>Comments noted. Section 6.1.5, (paragraph 9) Existing Management and Controls for Finfish Aquaculture has been amended appropriately.</p> <p>Comments noted. The Council considers this as an appropriate change in wording and this sentence in section 6.1.8 has been amended accordingly.</p>
Section 6.1 – Aquaculture	Dawnfresh Farming Ltd. [Organisation Response 10]	<p>P43 – 6.1.2 – paragraph 2 – Some of the information in the paragraph is inaccurate e.g. Ardchattan does have a fallow period and production from the loch is not as high as quoted. I suggest that you contact me for updated information so that the corrected information can be included in the final plan.</p> <p>P45 – 6.1.4 – ‘Effect on Wild fish populations’ - trout are not able to breed with salmon so there is not a risk associated with interbreeding between the species.</p>	<p>Comments noted and information in this section has been revised following confirmation of correct information.</p> <p>Comments noted and the Plan has been revised.</p>
Section 6.1 – Aquaculture	Marine Concern	Company Bonds; During at least one of the presentation/open sessions the matter of companies going into liquidation was raised. This was	Comments noted. This subject was discussed during the public meeting and focused on aquaculture. There was

Section/ Issue	Individual/ organisation	Comment	Response
	[Organisation Response 12]	<p>especially important in relation to the existing equipment left on the shore and afloat. Numerous heavy items have broken free from installations, and have/are causing dangers to navigation and potential danger to moored vessels and other fish farms. Broken nets and escapees would cause untold damage to wild salmon and trout stocks. Previous escapees from fin fish farms in Loch Etive have resulted in seals being shot, as the seals were attracted to the escaped farmed trout while they stayed in the river shallows, where the seals became easy targets. It could be argued that the seals were doing the wild fish populations a service. Bonds for new companies were discussed, in order to hold monies to “clean up” operations should a company go bust, this idea is welcomed.</p> <p>6.1.4. Aquaculture and its potential in disturbing wildlife</p> <p>If doubled skinned anti-predator nets were fitted to the trout (and all fin fish) farms there would be very little reason to shoot seals. If water bailiffs were to install land boards by fences on the shore by the seaway barrage in the River Awe there would be little cause for concern of seals venturing up stream.</p> <p>Both of the above would prevent the need to shoot seals. The Loch Etive colony is small and cannot sustain losing pivotal members of the colony. It is also part of the Lismore colony which is protected by the Habitats Directive. Sections of the Directive and the Special Area of Conservation (SAC) give protection to activities outside the SAC which may have an effect on the SAC, .e.g. Circular 6/95 (2000). Shooting in Loch Etive may cause an adverse effect to the Seals SAC, which would cause a breach in an EC Directive.</p> <p>It was quoted and listed that Dawnfresh was a member of the “Lismore</p>	<p>agreement that the Loch Etive Plan should include a local management agreement to encourage loch users to notify existing aquaculture companies of any debris/equipment they come across so that it can be collected.</p> <p>A bond is not something the Council would consider for aquaculture development as they are only considered for large developments in certain circumstances such as onshore wind farms and quarry development. If a site was abandoned then it is our view that it would be the responsibility of The Crown Estate as owner of the seabed to ensure the equipment is removed, which is actually a standard condition of seabed leases. In addition, planning conditions will be added to all new aquaculture permissions to ensure sites are maintained and not left in a state of disrepair.</p> <p>Generally, finfish companies are using tensioned nets, sometimes with false bottoms to prevent seal attacks rather than double skinned anti-predator nets. There does not seem to be any one single measure that works at all locations and companies generally use a suite of measures tailored to the conditions and experiences at that site. Dawnfresh use heavy duty tensioned nets with a false bottom (base panel) to provide resistance to seal attack. Acoustic deterrents are used if needed. Their experience of anti-predator nets in the past is that they often entangled birds and were not as effective as tensioned netting</p> <p>Comments noted. Common seals that haul-out regularly are likely to be part of the breeding colony at Lismore. The new seal licensing system is now in place and a licence would be required to shoot seals within Loch Etive. The licence process would assess any potential effect on the adjacent Lismore SAC, designated for common seals.</p> <p>Comments noted. The group you refer is an informal group</p>

Section/ Issue	Individual/ organisation	Comment	Response
		<p>Seal SAC Aquaculture and Fisheries Group”, this group has long been under scrutiny, and is one of the group as mentioned above, it has a “closed shop” policy regarding members, and one of its members is currently under investigation, as is the UK Government for potentially failing to adequately uphold the Habitats Directive; membership of this group should not be seen as a “good guidance” certification.</p> <p>Licensing to shoot seals now falls under the Marine (Scotland) Act 2010, where it is stated that all necessary measures must have first been taken before a licence is granted; failure to fit a second anti- predation net should mean that no seals should be shot; we will be watching this situation very closely.</p>	<p>set up in response to an EU complaint relating to the Lismore SAC designated for common seals at Lismore. The role of this group was to consider best practice for managing interactions with seals, and resulted in all fish farm operators signing up to a code of practice and additional seal counts of the SAC. As Loch Etive is within the catchment area of seals from the Lismore SAC, reference to this code of conduct is considered relevant to the Plan.</p> <p>It is our understanding that applicants of a seal licence will have to provide evidence of non-lethal measures used as part of the licence process. The Council is unaware of whether not undertaking specific measures would result in a licence being refused.</p>
Section 6.3 - Recreational Activities	Dawnfresh Farming Ltd. [Organisation Response 10]	P61 – paragraph 4 – typo – missing “of” between “lack parking”.	Comment noted and the Plan has been revised.
Section 6.3 - Recreational Activities	Marine Concern (Organisation Response 12)	<p>6.3.1. “Access via rough tracks”</p> <p>There is no mention which tracks this comment refers, but along the B845 only three have been identified; the private track to Millcroft and the private track on Ferry Island (Eilean Duirinnis) these are private tracks and service private houses. Following the case law of the successful “Stagecoach Case”, there is no right to access past people’s houses. Please remove this comment, as it will cause future problems and possibly be subject to legal representation. The third “track” is the footpath through the quarry, there is no vehicle access except for owners etc. The quarry now locks the gates at night and numerous vehicles have been stranded east of the gates.</p> <p>There is direct access to the loch side from the B845. It may be beneficial to stress that the Scottish Access law states “<i>RESPONSIBLE ACCESS</i>”, this does not include trudging across people’s gardens, camping in their gardens or using their gardens as a toilet, thereby causing distress to local inhabitants.</p> <p>Parking of cars - Cars are often left in dangerous positions along the B845 while people access the loch, usually for angling, this can be particularly dangerous during organised fishing competitions, when the volume of cars</p>	<p>The text in section 6.3.1 refers to access along the coastal track/path to fishing marks north of the quarry so does not refer private tracks to Millcroft or Ferry Island. This text has been amended slightly to make this clearer and to clarify that this is access by foot.</p> <p>Comments noted. Section 6.3.10 of the plan has been strengthened to make clearer, the point that access rights need to be exercised responsibly.</p> <p>These views are shared by other local stakeholders and the plan identifies inappropriate parking as a constraint/conflict. The wording of this section (section 6.3.7) has been</p>

Section/ Issue	Individual/ organisation	Comment	Response
		<p>can be high. Passing points are just that; not parking places; parking on bends where visibility is reduced is especially dangerous.</p> <p>Jet skiing is increasingly becoming a problem in Airds Bay, causing an audio, visual disturbance. The current “misuse” may well result in an accident, made worse if more personal watercraft are permitted or even advertised access. Future development and access must be accompanied by local restrictions in order to preserve vulnerable species, habitats, and people etc. With access points being effectively “advertised”, through the ICZM more traffic should be expected. By its very nature and proximity to Loch Lomond an increase in the use of personal water craft should be pre-empted. Airds Bay being of a particular concern, with numerous houses overlooking and thereby affected. It should be noted that there has been an increase in sailing dinghies and sea kayaks in Airds Bay. These activities are probably the least intrusive and problematic activities in the loch. Generally, these activities do not do well in the company of “jet-skies”, especially when beginners are involved. One possible solution would be to introduce local by-laws e.g. a personal water craft area east of the Bonawe Narrows (the western section of Zone E, in sight of the quarry) and sailing/paddle craft in Airds Bay.</p> <p>It should be noted that the larger sailing and powered craft using the moorings in Airds Bay (Airds Bay Mooring Association) and other moorings in the loch tend not to be problematic as they travel further field.</p>	<p>expanded to include road safety. The Plan recognises that additional small parking areas are needed to prevent dangerous parking and blocking of passing places and these needs are identified as opportunities in the relevant policy zones.</p> <p>It would be very difficult to restrict launching of jet skis from the shore. Existing access points are already advertised on many tourist, community and activity websites. Some web pages used by visiting recreational users do on occasion promote access at locations that are not appropriate and the Loch Etive Plan aims to promote only those access points that are suitable.</p> <p>While the Council has the power to create byelaws on land and on inland waters, it is not clear whether these powers extend to marine waters. In any case, proposed byelaws would need to be approved by Scottish Ministers and would not be granted unless there was substantial evidence of issues that needed to be addressed and evidence that they could be enforced effectively. The process of developing and approving byelaws is very long and resource intensive and any enforcement of such restrictions would require significant ongoing resources that the Council is unlikely to be able to meet. While zoning areas in the loch for personal watercraft would prevent any conflict in areas restricted areas, it could also serve to increase the number of personal watercraft visiting Loch Etive from having a dedicated area.</p>
Section 6.7 – Marine Renewable Energy	Taynuilt Community Council [Organisation Response 7]	<p>Section 6.7 Marine Renewable Energy / 6.7.2 Energy resource in Loch Etive</p> <p>The report indicates that "the total tidal energy resource in the loch has not been estimated". We believe and you may be aware that a Professor Anton Edwards produced a report on this topic. There was a letter from this gentleman published recently in the Oban Times.</p>	Comments noted. We were aware of the letter in the Oban Times but until now had been unable to trace the author. Professor Anton Edwards confirmed that he done some quick calculations of the energy that might be available for tidal energy extraction but had not produced a report on the subject.
Section 6.7 - Marine Renewable Energy	Marine Concern (Organisation Response 12)	<p>Future energy resource utilisation must allow shipping free passage.</p> <p>In addition to this any development in this field must be sympathetic to the area and have environmental interests at the forefront due to the loch’s ecological importance.</p>	Comments noted. We agree and these views are reflected in Section 6.7 of the Plan and it the Policy Guidance of Policy Zones B and D.

Section/ Issue	Individual/ organisation	Comment	Response
Section 6.8 - Marine Science	Dawnfresh Farming Ltd. [Organisation Response 10]	P75 – paragraph 2, first line – typo? – delete “our”.	Comment noted and the Plan has been revised.
Section 7 - Coastal Policy Zones			
Section 7 – Coastal Policy Zones (General)	SEPA (Organisation Response 23)	The draft plan presents the Policy Zones for each section of the loch in a positive way. The structure is clear and easy to comprehend; information is presented well, and as such this approach is to be encouraged. The clarity provided by the draft plan will ensure that aquaculture operators are given an unambiguous steer as to which areas are, or are not favoured for further developments, and at what scale. This is a significant step forward in coastal management planning.	Comments noted and support welcomed.
Section 7 – Coastal Policy Zones (General)	Historic Scotland [Organisation Response 11]	<p>In general terms, Historic Scotland would wish to plan to protect the site and setting of all historic environment features within the Loch Etive ICZM area. I note that ‘key historic features’ are identified in each of the policy zones. It would have been helpful if the plan had explained the reasoning as to why these were considered to be key. It could be that you consider that these have coastal settings for instance and that is why they are specifically listed, however this is not entirely clear. It is also rather unclear why these lists of key features do not always appear to include unscheduled archaeology.</p> <p>I also note that only certain sites are mentioned specifically in the opportunities and constraints section of the policy zone documents. Historic Scotland consider that features particularly sensitive to potential impacts from development in the zone are those with coastal settings, including scheduled monuments such as fortifications, duns, brochs, ecclesiastical sites and chambered cairns, listed buildings and inventory gardens and designed landscapes.</p> <p>You may also wish to consider reflecting potential impacts on these features more explicitly in the text of the policy guidance for each of the zones. It will also be important for any lower level assessments to consider the particular sensitivities of these types of sites and seek to mitigate</p>	<p>Comments noted. The heading of ‘Historical Features’ lists all coastal and marine scheduled or listed historic features within or adjacent to the policy zone boundary. We agree that the use of the word ‘key’ in this instance is confusing and has therefore been removed. Unscheduled archaeology had only been listed and mapped where sites were identified as being of local importance by local stakeholders during public meetings. The Council considers that this has not resulted in a consistent approach across all policy zones and all known coastal unscheduled archaeology has been listed and mapped in the relevant policy zones.</p> <p>Comments noted. Only those historic features where it was considered there were opportunities to either promote or improve access/interpretation have been included in the opportunities tables in each Policy Zone. Likewise, only those historic features that it was considered would be affected by coastal or marine development were included in the constraints table. This included the identification of historic features with a coastal setting which could be affected by development.</p> <p>This would be done only where the policy guidance identified a presumption for development of a particular type which had the potential to impact on historic interests. Any development proposals would have to be consistent with the</p>

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		<p>against any significant impacts identified.</p> <p>In addition, there is the potential for impacts on unscheduled or unrecorded marine archaeology. We generally recommend that any assessment of impacts on marine archaeology consider onshore impacts to marine historic features within and beyond the proposed development site (e.g. resulting from mooring installation, support structures, slipways and piers) and offshore impacts to historic features on the seabed or at the coast edge within and beyond any proposed development areas (e.g. alteration to tidal currents and sedimentary regimes and by changes to the chemical balance of the water and seabed sediments).</p> <p>Furthermore, you may wish to consider trans-boundary impacts, for example whether development within one zone could impact on historic environment features located within another adjacent zone.</p>	<p>General Policies in the Plan which also requires proposals to be consistent with relevant Local Plan policies which aim to protect and enhance the historic environment. Any development proposal would require careful detailed assessment of potential impacts on historic interests and to identify appropriate mitigation against significant impacts.</p> <p>Comments noted. This information has been included under section 5.3.3 of the Plan. All known unscheduled wrecks have been identified in the policy zones and mapped. Under the Local Plan (LP ENV 17 - Development Impact on Sites of Archaeological Importance) there is a presumption in favour of retaining, protecting, preserving and enhancing the existing archaeological heritage and any future discoveries found in Argyll and Bute. As stated above the General Policies in this Plan require any development proposal to be consistent with Local Plan policies, including LP ENV 17.</p> <p>While trans-boundary impacts were not specifically assessed during the development of this Plan we are not aware of any such effects that might result from the opportunities or policy guidance identified in each Policy Zone.</p>
<p>Section 7 – Coastal Policy Zones (General)</p>	<p>SNH [Organisation Response 3]</p>	<p>Q7. Are the policy zones easy to understand and use? - Yes.</p> <p>Q8. Do you agree with the identified opportunities and constraints for future use and development?</p> <p>See general comments on promoting and interpreting Loch Etive and the potential effect this may have on the wild and remote nature of the loch if this is not carried out appropriately.</p> <p>We have some concerns regarding the proposal on page P95 (Policy Zone B, Opportunities) for the erection of a small sign at the start of Ghillies path at North Connel alerting recreational anglers to the requirement for permission from the fishing rights owner to catch and retain salmon and sea trout. The proposed signs could increase the profile of these species to anglers visiting the area who may begin to fish for them. It will be very difficult to police recreational anglers for permits at this location as there is only one bailiff for the whole of the Awe catchment and the bailiff generally concentrates on the river Awe</p>	<p>Comments noted.</p> <p>Comments noted. Opportunities related to promoting access and interpreting Loch Etive has been reviewed and changes made as detailed in our response to your comments under ‘General’ above.</p> <p>Comments noted. The idea of alerting recreational anglers to the requirement for permission to catch and retain salmon and sea trout was suggested at an initial meeting with Argyll Fisheries Trust and Argyll District Salmon Fisheries Board. I understand that the Trust and Board and SNH are in agreement that signage would only be appropriate at Ghillies Path. The opportunity in Policy Zone B has therefore been removed.</p>

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		<p>itself. Therefore the overall effect of erecting signs is likely to be a negative one for the fishery. An increase in fishing effort for salmon and sea trout (which are both LBAP species) in the absence of any increased policing resource thus no increase in revenue for owners of the fishing rights.</p> <p>It is well known that salmon and sea trout can be caught in Loch Etive around Taynuilt in parts of Zone D and also up into Zone E. The River Awe is a prominent feature and it is obvious to any angler visiting Taynuilt for the first time that these species are likely to be present. As such notices in the car parks of the piers at Taynuilt regarding the need for permits to be secured may bring some benefits in terms of increased revenue or reduced fishing effort for salmon and sea trout (both LBAP species).</p> <p>P96 POLICY ZONE B: NORTH CONNEL TO ACHNACREE BAY (CONNEL NARROWS) Opportunities Any marina at Camus Bruaich Ruaidhe would have to be designed and constructed with invasive non native marine species in mind (individual pontoons that can be removed to allow cleaning, self contained cleaning facilities so that invasive species washed off boats are not returned to the sea) in order to protect the loch and the shellfish industry in particular from invasive non native species especially the carpet sea squirt.</p> <p>P135 POLICY ZONE F: ARDMADDY TO GLEN ETIVE Opportunities Recreation There is a statement that interpretation should be provided for Policy Zone F although it doesn't describe what type. We would suggest that interpretation boards are inappropriate in this Policy Zone because they could spoil the remote nature of the area, perhaps a leaflet that people can bring with them might be more appropriate.</p> <p>Q9. Do you have any comments on the policy guidance? See general comments on promoting and interpreting Loch Etive and the potential effect this may have on the wild and remote nature of the loch if this is not carried out appropriately.</p> <p>We agree with the following statements on Aquaculture development: P.87 Presumption in favour of aquaculture development at Garhb Ard in Policy Zone A P.96 Presumption against aquaculture in Policy Zone B</p>	<p>Comments noted. This opportunity has been retained but reworded in light of comments from Argyll District Salmon Fisheries Board.</p> <p>Comments noted – Further information on INNS considerations have been added to Table PZB relating to marina development at Camus Bruaich Ruaidhe. Policy LE INF1 has also been amended to include consideration of design structure to aid eradication and the need for self-contained cleaning facilities. Additional text has also been added to the recommendations for INNS in Section 5.4.6.</p> <p>Comments noted. We agree that interpretation boards are likely to be inappropriate in this policy zone. This opportunity has been reworded to read 'Better promotion of established coastal paths and walking routes in the area and potential to incorporate historic, cultural and wildlife interests into wildlife tours and boat trips'</p> <p>Comments noted.</p> <p>All comments noted</p>

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		<p>P.105 Presumption in favour of a small scale development at Kilmaronaig in Policy Zone C as long as the bird breeding area at Abbot's Isles is safeguarded.</p> <p>P.116 Presumption against new developments in Policy Zone D, suggest consolidation of existing sites to maximise production, there will be an opportunity for this once the loch has been cleared of equipment to in response to the <i>Mytilus trossulus</i> issue.</p> <p>P.127 Presumption against new development in Policy Zone E suggest consolidation of existing sites to maximise production.</p> <p>P.136 Presumption against aquaculture in Policy Zone F.</p> <p><i>Q10. Have all the appropriate non-statutory consultees been identified? - Yes.</i></p>	Comments noted
Section 7 – Coastal Policy Zones (General)	The Crown Estate [Organisation Response 14]	<p>Very briefly, without commenting on the individual policy zones themselves, our view is that the Policy Zone information and structure is clearly set out and, again, pragmatic in its approach.</p> <p>We have two observations on policies, namely:</p> <p>(i) Very pleased to see guidance incorporated to account for opportunity in the event of relinquishment of existing development. This should encourage consideration of this aspect by existing and potential developers and (hopefully) help to foster a more 'holistic' view of development opportunity in Loch Etive.</p> <p>(ii) The intimation of opportunity that may arise through negotiated mitigation of constraints with interested parties is a significant inclusion in our view, as this retains the all important 'opportunity to explore opportunity' element for potential developers, rather than overly prescriptive policy and that can sometimes stifle ambitions in this regard.</p>	<p>Comments noted.</p> <p>Comments noted. Policy Guidance on development potential based simply on the amount of existing consented sites in areas that are already well developed is of little use to developers in informing potential for increasing production. We have therefore tried to provide a more holistic view and aim to provide further guidance to assist existing operators consider consolidation options if they so wish.</p>
Section 7 – Coastal Policy Zones (General)	Individual [Response 16]	<p><u>In section 7 (Re. Question 10)</u></p> <p>It would be helpful if either or both myself and my brother Ronnie were consulted regarding anything proposed was in anyway likely to affect navigation on the loch, we are both pilots for the loch. Ronnie to a lesser extent than I, but also we both make regular use of the loch in our other works.</p>	Comments noted. Ronnie and you have been included in the non-statutory consultee list in each Policy Zone.
Section 7 – Coastal Policy Zones (General)	Individual [Response 17]	<p>Q7 - The Policy Zones are straightforward, logical and easy to understand and use.</p> <p>Q8 & 9 - Specific comments on the individual policy zones are given below. I have two general comments on Section 7 of the Plan. First, the</p>	<p>Comments noted.</p> <p>Comments noted. The Plan recognises that there are concerns from the current level of recreational activity in the</p>

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		<p>Plan seems to recognise the constraints on development in the Loch Etive area but is still in favour of increased recreational use of the loch. The environmental risks associated with increased use of fast, powered watercraft whether sportsboats, cruisers, dive boats, anglers' boats or jetskis have probably been underestimated because the loch is currently lightly used by such vessels. Given that there is no means of directly regulating the numbers of such vessels it will not be possible to put the genie back in the bottle once additional facilities have been provided and large numbers of users have begun to harm the natural environment which they have come to enjoy. My subjective impression is that the number of craft using the loch has increased in recent years in line with the general increase in the recreational use of the marine environment. Active promotion of Loch Etive for recreational use may be unwise.</p> <p>My second general comment is that the poor provision of road infrastructure in Zones C and D needs to be emphasised. There are a number of recommendations for small developments, e.g., provision of divers' car parks and changing facilities at Achnacloich, Taynuilt and somewhere along the north side road. Each of these would increase the volume of traffic and the number of vehicles with boat/canoe trailers on roads with limited capacity and, in many cases, already poor surfaces.</p>	<p>area, in terms of parking, access, camping and litter and therefore any improvements to existing infrastructure and opportunities for new facilities will need to be considered carefully in order that recreation does not result in unacceptable impacts on the environment and local communities. The Council agrees that there is a general increase in the recreational use of the marine environment and it is likely that this will continue in Loch Etive. Many of the access points currently used are in poor condition and with minor improvements could keep users to dedicated locations rather than spread access over a larger number of less suitable sites which could lead to further access issues.</p> <p>It should be noted that many of the opportunities to improve access which are identified in the Policy Zones are minor improvements to existing used infrastructure and the opportunities for new facilities relate to very small scale infrastructure. Section 6.3.10 of the Plan now includes a statement prioritising improvements to existing access points over development of new ones.</p> <p>Comments noted. We agree that road infrastructure as a limiting factor to access improvements should be reflected in the guidance for these Policy Zones. Constraints to recreational use relating to poor road infrastructure have been added to Policy Zones C and D.</p>
Section 7 – Policy Zone A	Individual [Response 17]	<p><i>Policy Zone A, Opportunities:</i> I presume the reference is to Dunstaffnage Castle, not Dunstaffnage Marina.</p> <p>The potential for aquaculture development close to the Garbh Aird peninsula in Ardmucknish Bay is not disputed. However, I do not think that the shore base could be located near the airport as this would require some means of landing/loading and unloading to be provided on the shore between Ledaig caravan site and Ledaig Point. Not only would such a facility be visually and environmentally intrusive, it would also be unlikely to survive the winter weather to which this beach is exposed and would be</p>	<p>The reference is the Dunstaffnage Castle and this opportunity has been removed as road improvements are planned and the parking improvements relate to staff parking for SAMS.</p> <p>Comments noted. On review of this Policy Zone we agree that it would be difficult to find a suitable site with immediate shore access between Ledaig Caravan Park and Ledaig Point. The only location would be just south of the caravan site which is within the Area for Action (AFA) identified for air transport development where onshore aquaculture development would not be a priority. This development</p>

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		<p>unusable for significant periods of time. Any shore base for aquaculture developments near the Garbh Aird peninsula would need to be close at hand at Port an Duine or the site be serviced from existing facilities elsewhere.</p> <p><i>Policy Zone A, General:</i> There seems to be a conflict between the promotion of increased access and walking and the noted sensitivity of sand dune and saltmarsh habitats to erosion from foot and vehicular traffic.</p>	<p>opportunity has been removed from Policy Zone A. Aquaculture development in this zone would need to be serviced from existing facilities outwith Policy Zone A.</p> <p>Comments noted. The opportunities that promote walking and access relate to the use of established coastal paths, most of which are proposed core paths. Use of these routes is unlikely to affect the sensitive habitats identified in this Policy Zone. The interpretive panel for An Sailean is part of a project by Lochnell Estates related to management of the saltmarsh and a location has been chosen that will not impact on this habitat. The opportunity for viewing areas and interpretation has been limited to Poppies Garden Centre and the opportunity under 'marketing' has been amended to focus on promotion of established coastal paths and walks in the area.</p>
Section 7 – Policy Zone A	Historic Scotland [Organisation Response 11]	<p><u>Policy Zone A: Ardmucknish Bay and Dunstaffnage Bay</u></p> <p>I welcome that the plan considers impacts on the unscheduled SS Breda wreck from new marine aquaculture development proposed at Ardmucknish Bay.</p> <p>The plan also identifies the potential to open up access to Dun Mac Sniachan, forts & dun, Benderloch (Index No. 2179). As noted above, Historic Scotland would welcome discussions about specific proposals in greater detail.</p> <p>I also welcome that the plan recognises the potential for development to impact on the setting of coastal historic features including Dunstaffnage castle (Index No. 90120 & HB Num 11987) which is also a property in the care of Scottish Ministers, Lochnell House (HB Num 4716) and sites at Port Selma. Although listed as key historic features, you may wish to also consider impacts on Eilean Mor, fort, Dunstaffnage (Index No. 3944).</p>	<p>Comment noted. Although the wreck of the SS Breda was considered on reviewing this Policy Zone it has been decided to specifically mention potential effects on this interest from development, under the opportunities and constraints.</p> <p>Comments noted and support welcome.</p> <p>Comments noted. On reviewing the guidance in this Policy Zone it is considered that marine development could negatively affect the coastal setting of Eilean Mor, fort, Dunstaffnage and this historic feature has been included in the constraints to development.</p>
Section 7 – Policy Zone A	Individual [Response 16]	<p><u>Policy Zone A</u></p> <p>Vessels awaiting slack water at the Falls of Lora frequently anchor in Tralee Bay (near to Lochnell House).</p> <p>In “Development” – Re. Navigation: The passage between Eilean Mor and Dunstaffnage/Poppies is also used by commercial vessels in bad weather if</p>	<p>Comments noted. Text describing Commercial Shipping has been expanded to include this use.</p> <p>Added comment to constraints table under Development.</p>

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		<p>the tide is right, and so should not be obstructed.</p> <p>Further in “Development”, under Policy Guidance (7) uses the word “comprise” when “compromise” should be used surely (we are all human).</p>	Correction most welcome and change made.
Section 7 – Policy Zone B	Individual (Response 1)	<p>The tidal power harnessing potential of the Falls of Lora.</p> <p>The Plan is appropriately circumspect in its approach to the prospect of introducing devices that might harness tidal energy at the Falls of Lora. However, whilst acknowledging the limitations offered by the channel morphology and tidal range, there would usefully also be an acknowledgement of a need to assess any detriment to the Falls both as a tourist spectacle and as an important natural feature exploited by recreational kayaking in any cost-benefit analysis that purports to evaluate the impact of introducing turbines or other energy-exploiting devices into the flow.</p>	Comments noted. The Falls of Lora as a tourist attraction has been added to section 6.7.5 and Policy Zone B. Sea kayaking is already identified as a key constraint in both these Plan sections.
Section 7 – Policy Zone B	Individual [Response 17]	<p><i>Policy Zone B, Access:</i> The car parking opposite the Oyster Inn is better described as “limited” rather than “good”. The “car park” on the north side of Connel Bridge is better described as “the old road section”.</p>	Comment noted. Have applied this change to Policy Zone B, under the Access heading.
Section 7 – Policy Zone B	Historic Scotland [Organisation Response 11]	<p><u>Policy Zone B: North Connel to Achnacree Bay (Connel Narrows)</u></p> <p>A new marina development is proposed in this zone. I note that the B listed Connel bridge (HB Num 11986) which spans this stretch of water is listed as one of the key historic features in this zone. You may wish to consider if the development directly impacts on the bridge structure, for instance from changes in water flow in the zone, or indirectly impact on its setting.</p> <p>I welcome that Earl of Carrick unscheduled wreck is listed as one of the key historic features. It will be important to consider impacts from development in this zone on this site.</p>	<p>Comments noted. The Council considers it unlikely that any new marina development at Camas Bruaich Ruaidhe would affect the bridge structure as a result of changes in water flow. It is possible however that such a development might affect the setting of Connel Bridge and therefore Table PZB has been updated to highlight the need to consider the setting of this B listed feature.</p> <p>Comments noted. This feature would need to be considered for any development proposal and would be covered by the General Policies in Section 4 of the Plan.</p>
Section 7 – Policy Zone B	Individual [Response 16]	<p><u>Policy Zone B</u></p> <p>Future Use – Improving the slip at the Falls of Lora viewpoint would be a benefit to yachts people coming ashore by dinghy to enjoy the viewpoint and the Oyster Inn. The height clearance under Connel Bridge is understood to be 16 m at high water.</p> <p>Further in Development – Any sewage discharged into the loch at Connel or North Connel is likely to be carried into the inner loch (consult the Clyde River Purification Board. Re. Their red plastic mushroom like devices were put into the sewage discharges from the north end of Connel Bridge in the</p>	<p>Comments noted and revision made to both the Opportunities and Constraints tables under Future Use.</p> <p>Comments noted. Sewage from houses connected the public sewer in Connel is now pumped to Saulmore for treatment which has reduced the level of sewage discharge into the Loch at Connel. Discharges from those houses not connected</p>

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		1980's which landed ashore alongside other plastic "toiletries" at Achna Ba).	to the public sewer and from the public sewer in North Connel will undoubtedly be carried into the inner loch during flood tides. The discharge points marked on the Policy Zone B Activities map show the discharges that are consented by SEPA, and therefore environmental impact assessed.
Section 7 – Policy Zone C	Historic Scotland [Organisation Response 11]	<p><u>Policy Zone C: Achnacree Bay to Achnacloich</u></p> <p>I welcome that the plan seeks to promote Achnaba, cairns (Index No's 2818 & 3969) through appropriate sign posting and interpretation and look forward to working with you in helping to achieve this aim.</p> <p>I also welcome that the policy guidance for this zone explicitly aims to protect the setting of the Achnacloich Inventory garden and designed landscape, given its panoramic views across and along Loch Etive and with its three designed viewpoints encompassing views westwards along the loch. You may also wish to consider whether development within this zone could impact on views from the Ardchattan Inventory garden and designed landscape which is located within policy zone D.</p> <p>I am pleased to note that the policy guidance aims to protect the setting of the B listed Ardchattan Kirk (HB Num 4712). You may also wish to consider including other coastal features such as Ardchattan Priory, priory, burial ground & cross slab (Index No. 90019) and Dun Creagach, dun 145m NW of Achnacloich (Index No. 3682).</p> <p>I welcome that an unscheduled wreck at Achnacree Bay is listed as one of the key historic features. It will be important to consider impacts from development in this zone on this site.</p>	<p>Comments noted and support welcomed. It should be noted that this is a development opportunity identified by the Council, rather than a development proposal that the Council has agreed to take forward. Therefore, while the Council supports the identified opportunity, the promotion of the Achnaba cairns may not necessarily be taken forward by the Council or any other interested party for that matter. It is expected that any forthcoming proposals would be discussed with Historic Scotland at the earliest opportunity.</p> <p>Comments noted. It is considered that small scale aquaculture development at Kilmaronig is not likely to significantly affect the views from Ardchattan Inventory Garden, located in Policy Zone D.</p> <p>Comments noted. See comments above on Ardchattan Priory. The Scheduled Ancient Monument (SAM) (Dun Creagach, dun 145m NW of Achnacloich) was missed from our original assessment due to the fact that SAM are mapped as a polygon and this site was too small to see on the policy zone maps. This site has now been considered and included as appropriate in the guidance for this Policy Zone.</p> <p>Comments noted. This feature would need to be considered for any development proposal and would be covered by the General Policies in Section 4 of the Plan.</p>
Section 7 – Policy Zone C	Individual [Response 16]	<p><u>Policy Zone C</u></p> <p>Herons nest in numbers to the rear of Ardachy House.</p>	Comment noted and added to Policy Zone C.
Section 7 – Policy Zone C	Individual [Response 17]	<i>Policy Zone C, Policy Guidance:</i> The presumption in favour of aquaculture development at Kilmaronaig is misguided. Any development along the	Comments noted. An aquaculture development at this location would not be subject to prolonged views from the

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		<p>shore to the south east of the islands would be clearly visible from the A85 where it emerges just west of Malcolm’s Point (there is a layby at this point and a stile to facilitate access to the point). A development here would provide an unwanted foreground to the view across Loch Etive to Beinn Lora. Given the unused capacity for aquaculture developments further up the loch there seems to be no need to introduce such a development into this section of the loch where the visual amenity and landscape value is so high.</p>	<p>A85 and drivers would only get an occasional glimpse when traveling west on this road. While such a development would be visible from the point accessible from the small lay-by at Linne na Craige, it would not be the focal point of this view. In addition, development would not be obvious from this lay-by or the larger lay-by to the east, before Achnacloich bridge.</p> <p>A Landscape/seascape capacity assessment for aquaculture development was undertaken by SNH in 2010 and this report identifies potential for small scale development at this location. SNH's response to the draft Plan consultation supports this Policy Guidance.</p> <p>It is considered that development in policy zones D and E through consolidation and rationalisation would be of preference to new development in Policy Zone C. The additional guidance in Table PZC includes a statement to this effect.</p>
<p>Section 7 – Policy Zone C</p>	<p>Individual [Response 18]</p>	<p><u>Ardachy House Zone C</u> I am a landowner in Zone C. I have not been correctly represented in the CZMP as all reference to Ardachy is to the farms and Ardchattan Estates. Within Policy Zone C, I am shown as part of a Rural Opportunity Area – I object to this, this is my residence. The foreshore that I own is shown as a Sensitive Countryside Area, the two islands designated as Very Sensitive Countryside which does not tie in with an area of rural development.</p> <p>A fishing site has been shown at the mouth of the loch, I object to this being shown on the maps as a place for development of fishing. We already suffer here from vandalism, pollution and vehicular damage caused by fishing, with lines, excrement, hooks, trash etc being left, also fire pits being created. Sewage pipes have not been represented correctly on the proposition maps.</p> <p>I object to the proposition that my property and the surrounding area is shown as a potential area of future recreational development, which includes fishing. I object most strongly.</p>	<p>Comments noted. Text under ‘Access’ and ‘Recreation’ in Policy Zone C has been amended to acknowledge private land ownership and existing access issues relating to sea anglers. The Rural Opportunity Area (ROA) identified on the map in Policy Zone C is designated under the Council’s Local Plan and is just presented for information in the Loch Etive ICZM Plan. ROAs are areas where there is considered to be general capacity to successfully absorb small scale development including development in the open countryside.</p> <p>Comments and objections noted. The fishing symbol shown at Ardachy and Achnaba relates to shore fishing marks that are well used by sea anglers. The text changes referred to above identify that there are recurring access issues at Ardachy and discourages vehicular access and camping without landowner permission. The symbol therefore does not indicate an area for the development of fishing activities and following recent discussion with you about the use of this area, the Council will consider the access concerns at this location further with our Access Team. Sewage pipes at this location were not marked on the map as data from SEPA did</p>

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			not identify a consented discharge at this location.
Section 7 – Policy Zone C	Argyll District Salmon Fishery Board [Organisation Response 20]	<p>Zone C Page 104. <i>Opportunities and constraints for Future Use and Development</i></p> <p>Recreation: SNH has raised the point that any signage at Achnaba Church may encourage illegal angling for sea trout and salmon beyond that point, without the means to police it. We suggest that signage is restricted to the main launching piers in Taynuilt. It is illegal to fish for or take salmon and sea trout without a permit, within 1.5 km of the land however, these species can be a by-catch of people fishing for other sea fish so specifically targeting salmonids is often difficult to prove.</p> <p>The Awe catchment has adopted stringent conservation measures and rather than go down the permit route, we suggest it would be preferable that any signage should emphasise both salmon and sea trout are under threat and if caught they should be carefully returned to allow them to spawn.</p>	<p>Comments noted. This opportunity for future use has been removed from Policy Zone C and the relevant opportunity in Policy Zone D amended accordingly.</p> <p>Comments noted and added to Policy Zone D under ‘Opportunities for future use’.</p>
Section 7 – Policy Zones C & D	Argyll Fisheries Trust [Organisation Response 8]	P104 & 114 – regarding angling signs about fishing rights. I talked to Stephen Austin about this one, and we agreed that there was no real need for this, and it might alert people to the possibility of catching salmon and sea trout. Happy for that specific opportunity to be omitted.	Comments noted. These opportunities were originally identified due to a concern about illegal fishing for salmon and sea trout, and a need to alert anglers to legal fishing rights. The Council is happy to remove these opportunities in Policy Zones C and D. On the basis of advice from ADSFB and SNH, the opportunity relating to signage at Taynuilt (Policy Zone D) has been retained.
Section 7 – Policy Zone D	Dawnfresh [Organisation Response 10]	P116 – points 3 and 4 – Dawnfresh welcome the recognition within the policy guideline of the potential benefits of site consolidation.	Comments noted.
Section 7 – Policy Zone D	Historic Scotland [Organisation Response 11]	<p><u>Policy Zone D: Achnacloich to Bonawe Quarry</u></p> <p>I note that opportunities for this zone include the enhanced promotion of historic sites. Historic Scotland support this approach and would wish to be involved in discussions about specific proposals.</p> <p>I note the potential redevelopment at Taynuilt Pier. As you are aware, Bonawe, Iron Furnace (Index No. 2500) which encompasses a scheduled monument, a property in the care of Scottish Ministers and a number of A listed buildings is located in this policy zone. Historic Scotland would welcome discussion with you about development proposals. Your Council’s conservation and archaeology services will be able to advise further on listed building consent connected with the maintenance/improvement of</p>	<p>Comments noted and support welcome.</p> <p>Comment noted. The Council proposes to consider future development/improvement options for Taynuilt Pier in more detail with the landowner and other relevant stakeholders and will involve Historic Scotland once these commence. The Council would expect that any the owner of Kelly’s Quay would discuss any proposals for maintenance/improvement with Historic Scotland and the Council’s conservation officer.</p>

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		<p>the B listed Kelly's Quay (HB Num 12181) at Taynuilt.</p> <p>Although listed as being a key historical feature in the document, you may wish to protect the setting of Dun Mor, dun, Inverawe (Index No. 2527) in the policy guidance. You may also wish to consider protect the setting of the Achnacloich or Ardchattan Inventory garden and designed landscapes in the policy guidance, given their panoramic views across and along Loch Etive.</p>	<p>Comments noted. The Policy Guidance in Policy Zone D has been amended to reflect the comments outlined here. While these sites were considered in the assessment of development potential it would be consistent with Policy Guidance in Policy Zone C to include a similar policy statement.</p>
Section 7 – Policy Zone D	Individual [Response 16]	<p><u>Policy Zone D</u></p> <p>The clearance under the power cables at Bonawe Narrows is higher than 16 m over the deep water channel in the Narrows. The 13 m low point occurs over an area of very shallow water. However “Spark Jump” distance to mast has to be taken into account too.</p>	<p>Comments noted and added to Policy Zone D.</p>
Section 7 - Policy Zone D	Argyll District Salmon Fishery Board [Organisation Response 20]	<p><u>Zone D Page 109:</u> Amend to ‘the catchment of the River Awe is arguably the most valuable fishery on the West coast of Scotland.</p> <p>AFT /ADSFB’s sea trout guidance leaflet can be downloaded off the AFT web site. www.argyllfisheriestrust.co.uk</p>	<p>Comment noted and the text under ‘Biodiversity’, Policy Zone D has been updated.</p> <p>Comment noted.</p>
Section 7 - Policy Zone E	Dawnfresh [Organisation Response 10]	<p>P119 – Paragraph 3 – Dawnfresh do not lease the private slipway/pier at Port na mine and this site is operated from the shore base at Inverawe.</p> <p>P119 – Table at bottom of page – The shore base location for all 3 trout sites should just read “Inverawe”.</p>	<p>Comment noted and relevant text amended.</p>
Section 7 – Policy Zone E	Historic Scotland [Organisation Response 11]	<p><u>Policy Zone E: Bonawe Quarry to Ardmaddy Bay</u></p> <p>I note that opportunities for this zone include the enhanced promotion of historic sites. As noted above, Historic Scotland supports this aim and would wish to be involved in discussions about specific proposals.</p> <p>Although listed as being a key historical feature in the document, you may wish to protect the setting of Dun Leigh, dun 200m ENE of Balure (Index No. 3773) in the policy guidance.</p>	<p>Comments noted and support welcomed.</p> <p>The sensitivity of the coastal setting of this scheduled ancient monument to poorly located development has been included in the constraints for development.</p>
Section 7 – Policy Zones E & F	Individual [Response 16]	<p><u>Policy Zone E + F</u></p> <p>Areas to the west of the loch in these zones are now being covered by <i>Rhododendron ponticum</i>, particularly at Craig, Barrs and Glen Etive.</p> <p><u>Policy Zone F</u></p> <p>There are lots of charcoal burning platforms along the woodland from Barrs Point to Glen Etive. Many are to be found near the point, one or two</p>	<p>Comments noted. This information has been included under the ‘Biodiversity’ heading in both Policy Zones.</p> <p>Comments noted. Information under Historic Interests for Policy Zone F has been amended slightly.</p>

Section/ Issue	Individual/ organisation	Comment	Response
		near Bonawe too.	
Section 7 – Policy Zone F	Historic Scotland [Organisation Response 11]	<u>Policy Zone F: Ardmaddy Bay to Glen Etive</u> You may wish to consider whether development within this zone may impact on the scheduled monument termed Gualachulain, cairn (Index No. 4148), which is just outwith the zone’s boundary to the NE.	Comments noted. The sensitivity of the coastal setting of this scheduled ancient monument to poorly located development has been included in the constraints for development.
Section 7 – Policy Zone F	Highland Council [Organisation Response 19]	<p>Settlements - the word "the" should be inserted between "to" and "head of the loch".</p> <p>Current uses - unless you want to stick with a standard order for these across all the policy zones, it would be better to list the current uses in order of their relative importance within each policy zone. For example, in zone "F" it doesn't make sense to deal with aquaculture first if there are no aquaculture operations in the zone. It might be better to start this section off with Recreation or Commercial Forestry because they have an obvious presence.</p> <p>I don't know what info the location of the "viewpoint" symbols is based on but the three on the west side of the loch near the top end look dubious. They don't look like natural vantage points. Views across the loch to Ben Starav from this section of the loch are attractive but I don't think they relate to specific points along the coastal path. It would be more appropriate to put a single viewpoint symbol on the shingle on the west side of the mouth of the River Etive. This is a view which many people coming from the north appreciate because they arrive at the head of the loch having driven down Glen Etive and suddenly a big vista down the loch opens up.</p> <p>You should also mark the car park which is at the head of the loch because this is a honeypot area.</p> <p>Map of current uses and activities: The symbols for coastal path location should be closer to the path itself. They are half way up the hillside at present.</p> <p>It doesn't seem relevant to mark the hillwalking routes to Beinn nan Aighenan, Stob Coir an Albannaich, Meal nan Eun and Glas Bheinn Mhor because none of these give any real views over Loch Etive. The hillwalking</p>	<p>Comment noted. The Settlement section has been updated.</p> <p>Comments noted. The headings under ‘current uses’ have been listed in a standard order across all policy zones which also relates to the order of headings for the key on the activities map for each policy zone. No change has been made to this Policy Zone.</p> <p>Comments noted. The mapped viewpoints are significant viewpoints offering panoramas of the loch and coast which were identified in the Landscape / seascape carrying capacity for aquaculture SNH commissioned report. An additional viewpoint has been added to the west side of the mouth of the River Etive.</p> <p>A car park symbol has been added to the head of the loch.</p> <p>Comments noted. The coastal path symbols have been removed from the map for the east side of this policy zone and at the head of the loch. These walks are now represented by ‘coastal walking routes’ and the hillwalking route to Ben Starav.</p> <p>Comments noted. The hill walking routes: Beinn nan Aighenan, Stob Coir an Albannaich, Meal nan Eun and Glas Bheinn Mhor have been removed from Policy Zone F and</p>

Section/ Issue	Individual/ organisation	Comment	Response
		<p>interest in Beinn Starav is worth marking however because it does give dramatic perspectives over the loch. It would be sufficient to simply mark the route to the summit from Glen Etive which follows the north ridge. This would be best done with a dashed line rather than a continuous line and the entry in the legend should read: "Popular hillwalking route: Ben Starav".</p> <p>The "coastal walks" symbol could conceivably be used for the footpaths on both side of upper Loch Etive, not just the west side. That is unless the concept underlying the symbol only relates to publicised, long-distance walking routes.</p> <p>"Kilometers" on the scale bar should read "kilometres".</p> <p>Map of designations: There is a blue boundary line and an open blue hatch on this map, the meaning of which is not clear. It is not explained in the legend.</p> <p>The solitary symbol for a "locally important unscheduled site" could do with a bit of explanation.</p> <p><u>Opportunities and constraints for future use and development</u> Opportunities - Forestry management - the entry in the draft plan reads like there are only pockets of conifer plantation from the 1970's in the extensive area of commercial forest near the head of Loch Etive. I have checked with our forestry officers and they have confirmed my impression that in fact most of it originates from around then and the forest tends to be fairly even-aged. The estate which owns it has prepared a Forest Design Plan and restructuring has started.</p>	<p>Beinn Starav has been amended appropriately.</p> <p>The coastal walks symbol has been used to define the approximate location of coastal walks where the exact route is not known and therefore cannot be mapped. In this Policy Zone there is however a clear track on both sides of the loch and the map has been amended to show these as 'coastal walking routes'.</p> <p>Comment noted. All maps have been updated.</p> <p>The blue boundary line marks an Area of Panoramic Quality which is the Argyll and Bute Council local landscape designation. This symbol had been missed on this map and has now been added to the map legend.</p> <p>Comment noted. This symbol relates to an unscheduled historic site (remains of Inverghiusachan Church) that was identified by local stakeholders during the public meetings as being locally important. This site was included in the Plan as it has a coastal setting. This site is listed in the policy zone under the Historical Features heading, prior to the maps.</p> <p>Comments noted. This opportunity has been amended appropriately.</p>

Section 8 – Monitoring and Review

Section/ Issue	Individual/ organisation	Comment	Response
Section 8 – Monitoring and Review	SNH [Organisation Response 3]	<i>Q11. Do you have any comments on the proposed approach to monitoring and review of the Loch Etive ICZM Plan?</i> We agree with the statements on Monitoring and Review of the Plan.	Comments noted.
Section 8 – Monitoring and Review	Individual [Response 17]	Q11 - The monitoring and review proposals appear to be satisfactory.	Comment noted.
Section 9 – Action Plan			
Section 9 – Action Plan	SNH [Organisation Response 3]	<i>Q12. Do you have any suggestions on appropriate Actions that could be included in the Action Plan?</i> We have nothing to add to the Action Plan. However we suggest that the M&CDU should not raise expectation in the public that meetings and feedback in particular may not be that regular due to resource constraints within the Unit and other demands on your time.	Comments noted. This is a very valid point. The M&CDU has limited resources, which may be reduced further as a result of current and future Council budget pressures. The wording of Action 1 of the Action Plan (section 9) has been amended to prevent raised expectations of regular meetings and this will be made clear at the next public ICZM meeting prior to the Plan being approved by the Council.
Section 9 – Action Plan	Individual [Response 17]	Q12 - A number of items in the Action Plan look like job creation projects. Future actions should be limited to those necessary to maintain and update the plan, integrate it with other statutory plans and make it available to the appropriate parties. Projects such as “Undertake a detailed resource assessment for tidal energy” should be left to others.	Comments noted. It is considered that the Action Plan is limited to the actions that are necessary to maintain and updated the Plan, ensure integration with other processes and make it available to relevant parties. The Council has limited resources to implement this Plan and the Action Plan has been designed to be delivered through existing officer time and external funding from other partners. Some of the actions under 'Improving Knowledge' and 'Sustainable use/development' relate to information that is needed to further inform the plan, as identified by stakeholders. Actions such as undertaking a resource assessment for tidal energy would not be undertaken by the Council, but instead the Council would seek to encourage the renewables industry, Government and others to take forward such an assessment. It should be noted that action 15 has been deleted from the Action Plan.
Section 9 – Action Plan	SEPA [Organisation Response 23]	Section 9 – action plan We welcome the integration of the Loch Etive ICZM Plan with other plans including river basin planning. Reference to the <i>SEPA Argyll Area Management Plan</i> should however be removed; the river basin management plans are Scotland’s plans, not just SEPA’s although we are leading on the process. The text should be amended throughout the Plan wherever this phrase has been used to read <i>Argyll and Lochaber Area</i>	Comments noted. All references have been updated accordingly.

Section/ Issue	Individual/ organisation	Comment	Response
		<i>Management Plan.</i>	
Appendices			
Appendices	Dawnfresh Farming Ltd [Organisation Response 10]	P163 – Listing of Dawnfresh Seafoods should be replaced with Dawnfresh Farming Ltd. Assumption that final document will include contact details.	Comment noted. The Plan has been updated with this change.
Appendices	SEPA [Organisation Response 23]	<p>Glossary - We suggest the following additions are made to the glossary in light of the above comments:</p> <ul style="list-style-type: none"> • <u>Ecological status</u> - insert “<i>ecological</i>” into the definition of good status so it reads <i>Good Ecological Status (Water Framework Directive)</i>. The description should also explain that the determination of ecological status in all surface waters includes the consideration of not only water quality but also marine ecology and alterations to hydromorphology caused by coastal development. • The Water Environment (Controlled Activities) (Scotland) Regulations 2005 (CAR) – regulations which require authorisation to be obtained from SEPA for any activity which may affect Scotland’s water environment. This includes discharges, disposal to land, abstractions, impoundments and engineering works in the water environment. • <u>River Basin Management Plans</u> – plans produced as one of the requirements of the European Union’s Water Framework Directive to ensure that public sector bodies, businesses and individuals work together to protect the water environment and address significant impacts by coordinating all aspects of water management for the next 6 years. The plans will be reviewed and updated in 2015. • <u>Water Environment and Water Services (Scotland) Act 2003 (WEWS Act)</u> – legislation translating the Water Framework Directive into Scottish law which gave Scottish Ministers powers to introduce regulatory controls over water activities, in order to protect, improve and promote sustainable use of Scotland’s water environment. This includes wetlands, rivers, lochs, transitional waters (estuaries), coastal waters and groundwater. • <u>Water Framework Directive (Council Directive 2000/60/EC)</u> - requires Member States to establish systems for managing their water environments, underpinned by extensive environmental monitoring and scientific investigation, by identifying natural River Basin Districts (RBDs) and developing River Basin Management Plans (RBMPs). 	Comments noted. The Glossary has been updated appropriately as stipulated here.

Section/ Issue	Individual/ organisation	Comment	Response
		Member states must also recover the costs of water services to encourage sustainable water use.	
Supporting documents			
Supporting documents (SEA & Equalities Impact Assessment)	SNH [Organisation Response 3]	<p><i>Q13. Do you have any comments on the SEA Environmental Report? - We have already offered comments on the SEA.</i></p> <p><i>Q14. Are there any potential equality impacts such as race, gender or other aspects that you feel would be affected by the implementation of this plan and its policies? - No.</i></p>	<p>Comments noted. The revised SEA Environmental Report will include a summary of comments made by the Consultation Authorities (SNH, SEPA & Historic Scotland) and our response to these.</p> <p>Comments noted.</p>