

Sandra Davies
Team Leader – Major Applications Team
Development Management
Argyll and Bute Council

28 August 2023

By email only: Sandra.davies@argyll-bute.gov.uk

Our ref: CDM160335

Dear Sandra,

20/01345/MFF | Formation of fish farm (Atlantic Salmon) incorporating twelve 120m circumference circular cages and siting of feed barge, North Kilbrannan Fish Farm, North Of Cour Bay, Kilbrannan Sound, East Kintyre, Argyll And Bute.

Further to our phone call with yourself, Peter Bain and David Logan on Friday afternoon (25th August 2023), we are writing to advise you that we have recently received additional information which we believe has the potential to influence the conclusions reached in our previous appraisal of the above planning application (hereafter referred to as the 'Proposal') and any subsequent advice to Argyll and Bute Council. We consider that this information is relevant to our appraisal of the impacts of the Proposal on the Atlantic salmon feature of the Endrick Water Special Area of Conservation (SAC).

NatureScot's statutory role in the planning process is to focus upon impacts on Scotland's natural heritage that potentially raise issues of national interest, and this includes impacts on sites of European importance, such as Special Areas of Conservation (SAC). In any instance where a proposal could affect a European site, we will undertake our own Habitats Regulation Appraisal (HRA) of the potential impacts and advise the Determining Authority accordingly. To inform our HRA, we consider all supporting information that is available to us, including information submitted in support of the Proposal as well as relevant internal and external sources.

Within the last week we have received two new documents that were not considered in our updated HRA (issued to the Council on the 23rd May 2023). These are as follows:

- **Wild fish monitoring data (2021-2022) collected as part of the Carradale North and South Fish Farm Environmental Management Plan (EMP). This was issued by MOWI (the Applicant) and received by NatureScot and Argyll and Bute Council at noon on Wednesday 23rd August 2023.**

Wild fish monitoring results carried out as part of the EMP for the operational Carradale North and South fish farms (approximately 8 km south of the Proposal). This data includes lice levels on wild caught sea trout in Carradale Bay, Kintyre. We consider that there could be a potential risk that requires further consideration.

- **An unpublished summary of the second year (2022) of salmon smolt tracking data from the Firth of Clyde. This was received by NatureScot at 13:15 on Friday 25th August 2023.**

The results of this indicate that of the 75 smolts which were detected at or beyond Cumbrae, six were recorded in the Kilbrannan Sound, which represents 8% of these smolts. We wish to highlight that in 2021 (the first year of this study), no tagged salmon smolts from the Endrick Water SAC were detected in the Kilbrannan Sound and that was the basis on which our original appraisal was made.

Given the timing of when we received the above documents, we have been unable to consult with our technical advisors and update our HRA in time for the scheduled planning hearing on the 29th August 2023.

We consider that this new information is material to our appraisal of the implications of this Proposal on the Endrick Water SAC and therefore has the potential to influence our conclusions and subsequent advice to Argyll and Bute Council. We wish to highlight this urgent matter so that you have the opportunity to take account of this in your recommendations to the planning committee on Tuesday.

If the planning committee were minded to delay the determination of this Proposal, NatureScot would undertake a review of this new information and provide an updated HRA to Argyll and Bute Council accordingly.

Yours sincerely,

[by email]

Catriona Laird

Operations Officer - West
NatureScot