

**MINUTES of MEETING of PLANNING, PROTECTIVE SERVICES AND LICENSING  
COMMITTEE held ON A HYBRID BASIS IN THE COUNCIL CHAMBER, KILMORY,  
LOCHGILPHEAD AND BY MICROSOFT TEAMS  
on MONDAY, 30 MARCH 2026**

**Present:** Councillor Gordon Blair (Chair)

Councillor John Armour	Councillor Graham Hardie
Councillor Reeni Kennedy-Boyle	Councillor Fiona Howard
Councillor Jan Brown	Councillor Paul Donald Kennedy
Councillor Kieron Green	Councillor Dougie Philand
Councillor Amanda Hampsey	Councillor Peter Wallace

**Attending:** Shona Barton, Governance Manager  
Iain Jackson, Governance, Risk and Safety Manager  
Shelley Gould, Senior Planning Officer, Planning Authority  
Sandra Davies, Major Applications Team Leader, Planning Authority  
Stephen MacIntyre, Head of Environment, Mowi Scotland, Applicant  
Rebecca Weeks, Senior Environmental Analyst, Mowi Scotland, Applicant  
Cameron Jones, Regional Seawater Manager, Mowi Scotland, Applicant  
Mark Laird, Carradale Site Manager, Mowi Scotland, Applicant  
Elaine Whyte, Clyde Fisherman's Association, Consultee  
Kenny McNab, Chair of Clyde Fisherman's Association, Consultee  
James Anderson, Objector  
Emma Kearns, Whitby Seafoods, Objector

**1. APOLOGIES FOR ABSENCE**

Apologies for absence were received from Councillors Audrey Forrest, Daniel Hampsey and Liz McCabe.

**2. DECLARATIONS OF INTEREST**

There were no declarations of interest intimated at this point, however, later in proceedings Councillor Dougie Philand declared a non-financial interest under item 3 of this Minute by virtue of his appointment to the Northern Lighthouse Board in his role as Provost. He advised that he intended to withdraw from the meeting and not take part in the debate and deliberation of the application. Councillor Philand left the meeting after this declaration, and this is detailed at the appropriate point in this Minute.

**3. MOWI SCOTLAND: REPLACE EXISTING 10 X 120M CIRCUMFERENCE PENS WITH 6 X 160M CIRCUMFERENCE PENS (WITH A PARALLEL MINOR RELOCATION INTO DEEPER WATER MOVING THE CARRADALE SOUTH SITE CENTRE 99M EAST) AND SITING OF EXISTING FEED BARGE IN A DIFFERENT LOCATION: CARRADALE SOUTH FISH FARM, KILBRANNAN SOUND (REF: 24/01381/MFF)**

The Chair welcomed everyone to the meeting, which was held on a hybrid basis. For the purposes of the sederunt Shona Barton, Clerk to the Committee, read out the names of the Members of the Committee and asked them to confirm their attendance.

In advance of the meeting, interested parties had confirmed they would make presentations to the Committee. Mrs Barton read out the names of those representatives and asked them to confirm their attendance.

The Chair explained the hearing procedure that would be followed and invited the Senior Planning Officer to present the case.

## **PLANNING**

### Shelley Gould, Senior Planning Officer

The Senior Planning Officer reminded members that at the PPSL Committee meeting of 17 December 2025, two applications had been considered for the replacement of existing pens with larger pens at Carradale South and Carradale North marine fish farms, located in the Kilbrannan Sound. At that time, members had agreed to continue consideration of both applications to a pre-determination hearing and site visit, due to the sustained objections submitted by the Clyde Fishermen's Association (CFA) and its members, and because of the resulting concerns regarding potential impacts on local commercial fisheries.

A site visit for members subsequently took place on Tuesday, 24 March 2026. For those unable to attend, the applicant had prepared a Google Earth video illustrating the site's location approximately 1.8 km north of Carradale village and harbour, on the western edge of the Kilbrannan Sound, east of the Kintyre Peninsula. The hamlet of Grogport lay approximately 2.6 km northwest, and the coastline adjacent to the site was designated as countryside.

The mapping material provided wider context for the existing operational marine fish farm, whose current pen layout was shown in blue. The video also demonstrated the positions of the installed pens and the location of the proposed 160-metre circumference pens, shown in red. Members were asked to note the contrast between the shallower waters at the Sound's edges and the deeper central channel, indicated respectively by darker and lighter shading.

For procedural reasons, the Senior Planning Officer advised that Carradale North and Carradale South would be addressed separately within the hearing, although the issues relevant to both sites were the same. She noted that the existing pens had been in operation since 2009 and 2015 respectively, and that both sites were managed as a single operational unit from the Mowi Shore Base at Carradale Harbour, which was currently undergoing significant investment.

Before moving to the individual applications, the Officer provided an overview of the proposal as a whole. The existing 10 × 120 m circumference pens at each site were proposed to be replaced with 6 × 160 m circumference pens. Updated charts submitted by the applicant and summarised in Supplementary Report No. 3 illustrated the distances involved in the proposed eastward relocation.

At Carradale South, the proposed pen group would shift 99 metres east from the existing site centre and 173 metres east from the current mooring boundaries. At Carradale North, the shift would be 79 metres east from the existing site centre and 150 metres east from the current mooring boundaries. Moorings on the northeast and southeast corners had been reduced to lessen any navigation impacts and to facilitate access for mobile gear vessels.

The Officer then presented the detailed proposal for Carradale South. This formed part of the applicant's wider modernisation programme. The current 10 × 120 m, 2 × 5 grid of pens would be upgraded to 6 × 160 m pens arranged in a 2 × 3 grid. The proposal also included top nets, moorings, and navigational lighting. In response to concerns raised by the CFA and local fishermen, the applicant had revised the planning boundary and reduced moorings on the southeastern corner to reduce impacts on fishing activity.

Sea-depth mapping demonstrated that the revised mooring layout would sit over steeply sloping seabed descending from approximately 23 m to 69 m, which was not considered suitable for most trawling activity. The Officer summarised the technical specifications of the pens, top nets, mooring systems, and the design of the nets extending to 35 metres in depth. The existing feed barge would remain onsite and would be repositioned centrally between both pen groups.

The Officer summarised policy compliance, noting that the proposal met the requirements of Local Development Plan 2 (LDP2) and the National Planning Framework 4 (NPF4). There were negligible visual impacts, no environmental effects, and no increase in biomass, which would remain at 2,500 tonnes per site. Benefits included improved containment, enhanced sea-lice management, reduced stocking density, and improved water flow and fish health. No statutory consultees had objected, including NatureScot, SEPA, Marine Directorate, Argyll District Salmon Fishery Board, Historic Environment Scotland, Northern Lighthouse Board, and others. No issues had been identified regarding amenity, noise, lighting, biodiversity, or navigation.

At the time of the December PPSL meeting, 11 objections had been received, primarily relating to concerns about local fishermen, the influence of planning processes, and suggestions that alternative sites were more suitable. The CFA had submitted three formal objections, noting impacts on commercial fisheries and asserting the need to maintain the existing compromise. Their objections, summarised in the supplementary reports, stated that the proposed relocation encroached on safe, productive, and provable fishing grounds, that mobile boats would be most affected, and that this was not a "minor relocation" for their members.

New representations received since December included two further objections, one from a local fisherman and one from Whitby Seafoods, two letters of comment, from a creel fisherman and from AquaSky, and two letters of support, from Salmon Scotland and East Kintyre Community Council.

The Officer presented detailed analysis of commercial fisheries impacts, noting the applicant's pre-application engagement with the CFA, the reduction of mooring extents by 14%, and the commissioning of the Poseidon Commercial Fisheries Report dated October 2025. This report concluded that, based on AIS tracking data between 2019 and 2024, only 1.4% of vessel positions fell within the proposed planning boundary and 0.3% within the proposed moorings boundary. It judged that there would be no significant impact on trawling or dredging, though navigation margins would be narrow.

A second commercial fisheries report commissioned by the applicant in February 2026 further clarified methodology and considered the CFA's "farm analogy". This report concluded that while approximately 0.8 km<sup>2</sup> could theoretically be excluded from trawling, the seabed topography indicated that the area was unlikely to be used for trawling at present. It found that only 1.5% of vessel positions over five years fell within the extended boundary area, and most of those would remain unaffected.

The Officer presented AIS tracking plots from the previous 30-day period and updated charts from December 2025 to March 2026, noting that no vessel tracks indicative of active fishing passed within the proposed moorings boundary, and that the closest active-fishing track remained 140 metres east of the proposed moorings.

The Officer outlined planning condition 18, agreed with the applicant, which required ongoing liaison, safe access measures for smaller vessels, and if required, the preparation of a fisheries management and mitigation strategy.

Officers were satisfied that the applicant had taken all reasonable steps to safeguard existing fishing opportunities, including design changes, technical analysis, additional consultation, and commitments to ongoing mitigation.

The Senior Planning Officer concluded that this was an existing operational fish farm, the proposal represented a minor eastward relocation, the development formed part of a positive modernisation programme, and no statutory consultee had objected. Impacts on commercial fisheries had been fully assessed, mitigated, and were not considered significantly adverse. The proposal was supported by the local Community Council as part of wider economic investment in Carradale.

The Officer advised that the proposal was consistent with the Development Plan and that no material considerations justified withholding permission, in accordance with Section 25 of the Town and Country Planning (Scotland) Act. The applications were therefore commended to members for approval, subject to the conditions and reasons set out in the Report of Handling dated 1 December 2025 and revised Condition 18 in Supplementary Report No. 2 dated 26 March 2026.

## **APPLICANT**

### Stephen MacIntyre - Head of Environment, Mowi Scotland

Mr MacIntyre advised that he would explain why they required to make these changes to their fish farms. He acknowledged the concerns expressed by local fishermen and the Clyde Fisherman's Association. He stated that they had tried to engage and be proactive in responding to these concerns and would outline the changes they had made to the proposal including additional assessments that they had undertaken to base these changes on.

He provided some background to Mowi advising that Scottish salmon was the UK's top food export, with the sector's economic contribution to Scotland increasing by 25% over the past four years. He advised that the economic contribution of the sector from Argyll in 2025 was estimated to be around 100 million pounds.

Mr MacIntyre said that Mowi was the largest operator in Scotland, showing a slide representing the spread of their locations where they operate and their employment levels on a national Scotland level scale. He said that operations throughout Scotland played a key role in the economic success of the sector at a local, regional and national level. Many of the fish farms were located in rural coastal communities. He showed Mowi's Argyll farming locations and employment levels in the region advising that their operations provided stability and opportunity in fragile coastal communities, securing year-round employment and supporting community investment and resilience with the Carradale fish farms and the partnership they'd established with the local community being such an

example. He advised they were investing in career pathways into aquaculture for young people by working with Salmon Scotland and Campbeltown High School and other partners to provide a vocational qualification in aquaculture. He said that they were regulated through a robust multi-agency framework, covering areas such as environmental protection, fish health, and planning; and voluntarily operated to a range of third-party standards.

Rebecca Weeks, Senior Environmental Analyst, Mowi Scotland

Ms Weeks provided information on operations at the site to date before presenting the proposed changes and the reasons for these changes. She said that the two sites lay very closely to one another and were operated as one. The proposal before the Committee indicated a decrease in the stocking density of the fish through the securing of additional water volume; there would be no change to the maximum biomass of 2,500 tonnes per site.

She advised that since 2011 they had harvested just over ten and a half million salmon from the Carradale sites combined, equating to 100 million meals. The purpose of the application was to secure jobs for Carradale into the future by investing in more modern equipment.

In terms of the sea water side, they were looking at an investment programme of around 3 million pounds paired with land-based developments in the community of around 2 million pounds. She advised they were aiming to modernise their footprint and create a modern and fit for purpose shore base for staff, as well as developing the Pier House on the shorefront. She said that they would like Carradale to be an established regional base and that the EKCC recognised the socioeconomic benefits of having Mowi in the local area. She confirmed they were committed to maintaining their community development fund and supporting the Carradale Affordable Housing Project in line with the proposed developments.

She said that the planning officer's report had advised that the primary issue raised during the application was that of commercial fishing, however, the report had concluded no matters that lead to reasons to refuse the planning permission and had been supported by the results of the statutory consultation with no objections received and the recommendation that planning permission be approved, subject to the hearing and the attached conditions.

She presented the initial layout of the fish farm that had been submitted as part of an initial screening request. The layout had been amended and resubmitted in light of the Clyde Fishermen's Association's (CFA's) feedback regarding marine traffic. She demonstrated on slides the reduction of 14% to the mooring boundaries in response to this feedback.

Another slide highlighted the initial marine traffic data that had been examined showing an area of higher traffic coming into and out of Carradale Harbour, which had been highlighted in the initial consultation with the CFA. She advised that from further analysis, it was found that most of the data was indicative of transiting rather than fishing. She demonstrated the primary area of fishing as being in the flatter, deeper area of the channel.

Ms Weeks advised that following on from the initial feedback and initial data, they had been able to decrease the moorings area on the east to the eastern extent and cut off the southeastern area of the moorings, adding that they were restricted on the inshore side by

depth as the larger pens required additional depth. They had been unable in terms of moving the pens back towards the west but had been able to shorten the moorings lengths on the east side; and that this would require higher investment by Mowi.

Cameron Jones, Regional Seawater Manager, Mowi Scotland

Mr Jones advised that across Mowi Scotland, they currently used a mixture of pens, ranging from steel square pens, which come in 24 by 24 pen, or 36 by 36 pen sizes, but more commonly, they used plastic circle pens, ranging from 100 metres all the way up to 200 metres. He said that currently in Carradale, there were ten 120 metre pens on each farm, totalling 20 across both sites. He said that number of pens required a lot of maintenance, labour and resource, making day-to-day operations more demanding.

Mr Jones advised that one of the reasons they were looking to expand and increase to 160 metre pens was that although the 120 metre pens were robust, they had found from experience on other locations with 160 metre pens that the design, larger walkways, and larger tubes dealt with the weather better. He said that as Carradale was an exposed site, it would be a positive improvement to the location.

Mr Jones said that fewer pens to manage gave greater efficiency in daily tasks, whether it was net washing, daily inspections, or health checks on stock. It also meant better fresh water bathing efficiency, therefore fewer pens to treat, meaning they were able to treat the farm quicker than what they were now, meaning less time with larger well boats in the area, which was a positive for all. The proposal aligned with other successful installations on other sites across Mowi Scotland.

He advised that although Carradale had a very low level of lice historically they would see improved sea lice control as the fish would be distributed across fewer larger pens. The lower stock intensities would support best practice for fish health and welfare. The low stocking density would reduce the waste deposition and extend on the seabed, helping to minimise seabed environmental effects. He advised that it provided the opportunity to use the 120 metre pen site currently at Carradale on other locations to upgrade their equipment.

Rebecca Weeks, Senior Environmental Analyst, Mowi Scotland

Ms Weeks provided information on stakeholder engagement. She said that of the statutory consultees, there had been no objections received, therefore the bulk of their focus had been on the objection received from the Clyde Fishermen's Association.

She advised that the Association had been approached prior to their objection as part of the engagement process, and there had been a number of both formal and informal engagements. The formal engagements had been summarised on a slide, with 18 recorded since November 2024; a mixture of Teams meetings, emails and phone calls which had included both the Executive Secretary and also CFA members directly. She advised that Mowi felt that they'd had useful collaborative exchanges with the CFA which had allowed them to update and amend their plans.

She advised there had been information shared from both sides and recognised there had been a national issue with data availability, however they had been able to geo-reference one chart plotter image successfully, which had been helpful in terms of site design. It highlighted an area of bad fishing grounds, which we were pleased to see correlated with the proposed mooring extent. She noted a general hesitancy around the sharing of

confidential data and acknowledged the reasons behind this. She advised both parties were working together with Salmon Scotland, forming a liaison group with many of the fishing associations to try and facilitate dialogue and work towards an approach for that for the future, which would be a great help to both sectors. She advised that a number of individual objections had been received but these hadn't provided any supporting evidence upon which they could amend the plans further.

Ms Weeks advised that Mowi had engaged an independent fisheries consultancy to analyse the data that was available publicly. The bulk of which was on AIS data from the last five years and represented all fishing vessels above 12 metres. She said that of all the positions recorded within that five year period, only four data points had fallen within the proposed mirroring boundary. She displayed a map on the screen showing a heat map of fishing effort and seabed types. The data represented 10 fishing vessels regularly using the area, eight of which were trawlers and two dredgers. In addition, she advised that their mooring surveyor confirmed, as an ex-fisherman, that the area directly under the proposed moorings was not suitable for trawling or dredging due to rocky outcrops or muddy seabed type. She confirmed that the proposed extension did not extend beyond the 80 metre contour line.

Ms Weeks referred to the farm shop analogy already mentioned by the Senior Planning Officer that had been brought to their attention just prior to the planning meeting in December. Mowi felt like the analogy would have been helpful in a new site development but did not feel it was as relevant to an existing site. In effect, the shop already existed and they were proposing a small extension of the shop. She advised that it also touched on losing safe and productive grounds and ending up with an area of unproductive land. She said that again they did not feel that it was representative of the application in hand, given that the wider extent of the sound would remain fishable. She acknowledged that the fisheries report had a weakness in that it did not capture vessels less than 12 metres in length. To try and address that Mowi had engaged with local fishermen in the Carradale area.

#### Mark Laird, Carradale Site Manager, Mowi Scotland

Mr Laird advised that on site, they took a note of any sort of fishing vessels that had been around the site and site boats. He advised that staff had not noted any active fishing in the proposed area. He added that as they were working alongside the local fishermen, they had willingly given them the data of where the fishing grounds were.

#### Rebecca Weeks, Senior Environmental Analyst, Mowi Scotland

To sum up on the commercial fisheries side of things, Ms Weeks advised that Mowi were conscious of the need to avoid competition for space and acknowledged the pressures on fishing in regard to spatial squeeze. She advised that they recognised and supported the importance of the wider Kilbrannan Sound and the Firth of Clyde itself as an important location for fishing. However, they felt like the application represented a slight expansion to an already existing farm over an area of potentially poor fishing grounds. She advised that, to the best of their knowledge, this was backed up by data as well as local engagement and their on-site observations. She said that the fisheries report, their own and the planning officer's conclusions were all aligned in that there was no significant impact to the wild fisheries as a result of the proposal.

#### Stephen MacIntyre - Head of Environment, Mowi Scotland

Mr MacIntyre advised that the changes they were seeking to implement had a range of benefits. They would modernise, improve and future-proof Carradale South Fish Farm, underpinning continuing employment and community benefit. He advised that this application was for investment in the seaside of their cargo operations, but there were also proposals for a parallel significant programme of investment on the shore side with planned harbour infrastructure improvements. Both investment programmes were complementary to one another.

He advised that they understood that the Council was looking at the Carradale Harbour themselves, and irrespective of the outcome of the hearing, they were committed to working with the Council and all other stakeholders to maximise the pool of resources through the fabric of the harbour and facilities for all harbour users, including the vessels that operate out of there.

Mr MacIntyre highlighted that the application had raised important considerations relating to marine spatial squeeze with commercial fishing. He advised that they fully understood these concerns and throughout had tried to engage constructively. He advised that they had paused the application while they had investigated further and sought ways to mitigate and resolve such concerns. He advised that they felt there had been a misunderstanding on the extent of the change they were proposing. He said that this was a minor change to the operational footprint of an existing long-established farm and hoped that they had conveyed that in their presentation based on all the evidence that they had considered. He concluded by saying that they genuinely believed the proposal would not result in the loss of recognised fishing grounds.

## **CONSULTEES**

### Elaine Whyte, Clyde Fisherman's Association

Ms Whyte advised that before she began her presentation there were a couple of points she wanted to respond to. She advised they were not against aquaculture, and they appreciated that there were employment opportunities and knew that there were two local people employed in that area at the moment, but they had a number of vessels in the area as well. She advised that 12 fishermen from the local area had objected to the proposal, she advised that there were three people to five people on those boats at times. She acknowledged that aquaculture did provide employment in the area, but so did they, and potentially a higher number were local people based in the community. She said it was great that aquaculture were training young people, but they had been doing that for a long time and for the last three years, two of their trainees won national trainees of the year at the Fishing News Awards. This year, they had been nominated for it again, for being one of the charities that have helped most in terms of getting people into stable employment.

Ms Whyte advised that in terms of policies, there were five policies in the National Plan that they could see, which were section 6, section 4, section 12, section 11, section 8 and section 9, that a basic ChatGPT search could show and one under the Argyll and Bute Local Development Plan. In respect of a point that was raised about absorbing things to the east of the site, she advised that there was rock dumping to the east of the site, and there was also cables there so it was quite a dangerous thing to do.

Ms Whyte stated that, in terms of the professional reports, there had been one from a local creeler and one from a company named Aqua Sky involved. She noted that she did

not know who Aqua Sky were and could not confirm the identity of that operator. The local creeler did have a known name, and she highlighted that twelve men had individually signed their names to say they had concerns. Given the small size of the area, this represented the majority of the local fishermen. She further noted that one crew fisherman, who was a member of the CFA, had provided data but had also objected to the licence and the development.

Regarding the Community Council, Ms Whyte explained that it was understood the Council had been keen to progress pontoon development in the area. It was not clear whether they would proceed, and she pointed out that the CFA could not provide the same level of financial support to the Community Council. However, contact had been made with the Community Council on 20 March to advise that the CFA did not support the proposal, due to the lack of consultation with local fishermen prior to the Community Council agreeing to support it. She expressed hope that the Community Council would work with the CFA going forward.

She also highlighted that CFA members had built Carradale Harbour, and referenced author Naomi Mitchison, who had written about the fishermen of Carradale, stressing that this heritage formed an important part of the community's history and needed to be protected. Ms Whyte emphasised that the issue was not minor, despite suggestions to the contrary, and noted that the fishermen would speak for themselves on the matter. She commented that the meeting felt as though it had become an exercise in proving the fishermen's existence, despite the reality that they were active and working in the area. Ms Whyte noted that there had been confusion expressed regarding the evidence presented. She stated that she did not understand why, as plotter data had been provided directly from the fishermen. She explained that AIS data did not capture vessels under 12 metres, which was a significant omission. She also referred to vessel tracking work undertaken by the Council but noted that it covered only a short time period. As such, it might not reflect the boats generally operating in the area during the summer or over a typical year.

Ms Whyte commented that the Council had mentioned the possibility of establishing a mitigation group after the decision was made, if the decision was in favour of the development. She stated that establishing such a group after ground had already been lost would be difficult and of limited value, aside from general good practice. She acknowledged the importance of dialogue and noted that the CFA was in more frequent discussions with the group, including with Stephen. However, she reiterated that mitigation after the loss of fishing ground would not be productive for the fishermen.

She also wished to address procedural matters. She noted that comments submitted following the previous event in December had not been reported to Committee, despite the CFA having provided them. She stated that the CFA had therefore often felt on the back foot, and that reports had been issued late at times. As the CFA representatives were not working full-time on these matters, they were doing their best to respond within tight timescales. Ms Whyte stressed that the fishermen already held a licence to operate in the area and were actively working there. She reiterated that it was a strange and difficult position to have to prove their existence when it was well known that fishing activity took place in the area.

Ms Whyte noted that she would need to move quickly through her remaining points but emphasised the importance of the issues raised. She explained that there were 109 finfish licenced sites in the West Coast marine area and that approval rates within Argyll and Bute Council had historically been very high. She stressed that Argyll and Bute were not

the only authority finding increasing difficulty in balancing the competition for space between fishing and aquaculture. Highland Council had encountered similar tensions and had taken different decisions in comparable circumstances. The Western Isles had likewise objected to several sites as spatial pressures intensified. She stated that this was now a national issue and that there was a clear shift emerging in how such conflicts were being viewed. She stated that decisions should not be based on whether some fishing might still be technically possible. Instead, decisions should be based on whether a proposal protected the long-term viability of an existing and locally important industry. At present, she believed the evidence did not demonstrate such protection.

Ms Whyte pointed out that some of the data being relied upon was around five years old. Since that period, both COVID-19 and Brexit had significantly altered fishing patterns, with many vessels tied up for long periods. This, she argued, had contributed to a loss of resilience within fishing businesses, making any further loss of ground more difficult to absorb. She stated that the supply chain for wild-caught fish was routinely under-represented in assessments. The chain was fragmented, involving haulage companies, processors, and exporters, yet she had provided detailed information illustrating the multi-million-pound businesses that depended on inshore landing activity. The impact extended far beyond harbour-side operations. She referred to a short film made by a woman in Lanarkshire who highlighted how workers in factories across Scotland were also dependent on the continuation of the sector. Ms Whyte noted that Argyll and Bute's national contribution was often hidden, despite its significance. She added that the industry trained its own workforce, including young people who wished to remain in the area. However, she did not believe the cumulative spatial squeeze had been properly addressed. Assessment had focused only on the impact of the extension rather than the wider pressures in the area, such as potential Royal Navy closures, existing Marine Protected Areas (MPAs), subsea cables, rock dumps, and other restrictions. The cumulative squeeze, she said, was real and growing.

Moving to policy issues, she explained that even a basic search would show conflicts with the National Marine Plan, the Argyll and Bute Local Development Plan, and Scotland's National Planning Framework. The CFA did not believe that approving the extension would support existing industries, given the displacement impacts and lack of alternative ground available for transit or relocation. She argued that the proposal conflicted with marine planning requirements to support coexistence and avoid displacement of established marine users.

She then addressed specific Policies requiring existing fishing opportunities to be safeguarded "wherever possible" were, she said, relevant here because safeguarding was possible. The CFA was not objecting to the presence of aquaculture at the site, coexistence was already occurring. They were simply seeking the continuation of the current balance. Fishing was culturally and economically vital to vulnerable coastal communities, producing "sticky money" that stayed in the local economy and sustaining strong community connections. She reiterated that a mitigation group established after ground had been lost would not change the reality for fishermen.

On the precautionary principle, Ms Whyte stated that where evidence was incomplete or uncertain, the principle required caution. Instead, assumptions were being made in place of data. This, she argued, was contrary to marine planning principles. She referenced relevant National Planning Framework policies and noted that the report had explicitly excluded downstream employment, processing, supply chains, and economic multipliers. By limiting analysis to spatial overlap, it had failed to assess the true economic impact or

recognise the interdependency between fisheries and local economies. This represented a significant omission.

On natural heritage and coexistence policies, Ms Whyte stated that the proposal relied heavily on AIS data, even though most inshore vessels did not carry AIS. Decisions to displace people had to be based on robust, representative evidence, which she did not believe was present. She pointed out that most vessels affected had already returned feedback confirming problems. The report's reference to "low activity" did not meet policy standards. She expanded on displacement concerns, explaining that shifting eastwards was not viable because of subsea cables and rock dumps, both of which created serious snagging dangers. She noted, with some emotion, that she had lost members and friends to accidents at sea, and emphasised that safety could not be underestimated. Fishing grounds were defined by ecological and safety constraints, not by convenience. Displacement led to increased conflict, reduced viability, and increased risk, and she argued that the assumption of easy absorption was unsupported.

Returning to cumulative impacts, she described the Clyde as an area facing numerous pressures: Royal Navy closures, Marine Protected Areas, aquaculture, subsea cables, and soon additional renewable infrastructure near Islay. The situation was akin to "death by a thousand cuts," meaning even small losses mattered. She stressed that no cumulative baseline had been provided. She highlighted concerns with the report's methodology, which used percentage area fished to suggest low impact. She explained that fishing grounds were not uniform; they contained small, high-value zones essential to annual viability. The approach therefore led to misleading conclusions. She emphasised the importance of hearing directly from skippers, especially those with small vessels, as they were the ones whose livelihoods were directly affected. She said fishermen were already operating in the area and that the extension would effectively be built over them. She challenged claims that the extension might function as a no-take zone and improve fisheries, stating that there was no evidence to support such benefits. She again noted that the impact was not purely physical overlap; it related to safety, operational constraints, economics, access, and flexibility.

Ms Whyte stated that the Poseidon report did not provide a sufficiently robust evidence base, failed to apply the precautionary principle, omitted key socioeconomic and cumulative considerations, and underplayed the inshore sector. She argued that conclusions of "minimal impact" were not supported by policy-compliant evidence.

She reiterated that displacement caused real harm, not inconvenience, and that coexistence was preferable where already functioning. Displacement increased steaming time, fuel use, emissions, and economic strain. She highlighted the dramatic decline in Clyde trawlers, from around 64 to about 15 over 12–15 years and warned that losing even two or three more vessels could threaten viability of haulage and downstream services. She stressed that this was not theoretical; it involved real people. Safety remained the most important concern. Ms Whyte recounted an incident where a member's vessel had caught on an anchor that was not where it should have been, nearly sinking the boat. Such hazards, she said, became more likely with increased spatial compression.

She argued that aquaculture jobs, while important, were not as locally embedded as fishing jobs, and that fishing income circulated directly within the community. The Carradale site employed two people, whereas the fishing fleet employed significantly more local crew whose earnings remained within the area.

On legal weight, she stated that material considerations and the precautionary principle must be applied where there was uncertainty, risk to safety, or potential economic harm.

She highlighted the importance of food security, noting that during COVID many fishermen sold directly to the public, demonstrating the value of local supply in turbulent times. She also noted that displacement would undermine net-zero ambitions by increasing fuel use.

Turning to intergenerational matters, she highlighted the ongoing issue of depopulation in Argyll and Bute. Her own grandfather had had to leave the area for work. Fishing provided local employment that kept families and young people in the community, supporting school rolls and maintaining population levels. She warned that approval would set a precedent for further encroachment into key fishing grounds. Fishing in Argyll and Bute had experienced repeated losses with very few regulatory decisions going in its favour. While the CFA wished to maintain good relationships with aquaculture, compromise was needed to prevent further erosion of fishing grounds.

On environmental matters, she emphasised the CFA's desire to work constructively with aquaculture but referenced recent issues, including the North Kilbrannan case, where low sea-lice risk was later found to be high, leading to an appeal. She noted that fishermen's experiences of biodiversity near pens did not always reflect the claims made. She reiterated that the Poseidon evidence base was materially deficient, especially regarding AIS and misrepresentation of typical fishing patterns. She referenced the detailed gap analysis provided to councillors, which identified missing high-value grounds and other omissions. She explained that the submitted report did not assess socioeconomic impacts on the basis that they were not relevant—a position she argued was inconsistent with Scottish planning principles. Fishing impacts went far beyond lost revenue, affecting viability of vessels and the wider supply chain. She believed councillors should consider whether they wished to take that risk. She clarified that fishermen were willing to provide data but had concerns about commercially sensitive information being published; however, workarounds were possible. Meetings with the operator had taken place, and fishermen had engaged openly.

She returned to the issue of cumulative loss, stating that while the report acknowledged spatial squeeze, it downplayed the significance of the extension. There was no cumulative modelling or baseline of historic loss. She repeated that small areas still held high value, and occasional use did not diminish their importance. Ms Whyte stated that the majority of the local fishing fleet was not represented in the dataset used by the report. Poseidon had not spoken to the CFA during the assessment, and the timeframe for comment had been extremely limited. She argued that the absence of EIS data had been incorrectly interpreted as an absence of fishing activity, despite the fishermen having clearly stated the area's importance.

In concluding, she said it was difficult for fishermen to repeatedly justify their existence and the cultural and economic value they brought to the area. The CFA wished to build a vibrant local industry and maintain a positive relationship with aquaculture, but they did not want to be pushed out. She emphasised that both sectors had a place and should continue to coexist as they currently did.

#### Kenny McNab, Chair of Clyde Fisherman's Association

Mr McNab explained that he had attended the meeting to support the fishermen who had objected to the proposal and stated that he had been taken aback by the attitude presented by Mowi and within the Poseidon report. He noted that he had been fishing for 55 years and had worked both inside and outside the fish farm areas for many years. In his view, the level of ignorance shown by Poseidon and Mowi regarding commercial fishing activity was astonishing.

He explained that when trawling or fishing, whether for demersal species or for shellfish such as prawns, which were the main stock in that area, there were grounds where fishing was productive and others where stocks were scarce. He stated that moving east would not provide viable grounds, and this was why the “hot spot,” illustrated in the purple area on the charts, was so important. The boats wished to fish there because the grounds were productive for prawns, yet the proposed extension by Mowi would remove this opportunity.

Mr McNab emphasised that fishermen fished for financial gain in the same way that Mowi operated for financial gain. However, the proposed extension would take existing fishing ground away from them. He remarked that if fishing grounds could be identified as easily as suggested by Poseidon, he could have completed such a desktop study himself decades ago, saving many years of experience and effort. He stated that the AIS data used in the report was completely flawed and failed to represent real activity. To provide wider context, he outlined what had happened in the Clyde over the past 15 years, noting that he had previously presented on this topic. Fifteen years earlier, the Clyde had 68 vessels over 15 metres in length; this number had since fallen dramatically. The number of scallop dredgers had declined from 23 to four, and nearly two-thirds of the under-15-metre fleet had also been lost. Overall, nearly two-thirds of the Clyde fleet had disappeared.

He attributed the primary cause of this decline to the loss of fishing grounds. During that period, the Clyde had gained five Marine Protected Areas, 18 fish farms, which he believed represented oversaturation in such a small marine region, and further closures due to Royal Navy operations and subsea cables. He stated that the Clyde Sea area covered approximately 3,600 square kilometres, of which around 1,150 square kilometre, roughly one-third, had been lost to closures of various types. Fishermen were repeatedly told they could no longer fish in certain areas, and this proposal represented yet another example. Although the extension might appear small, he said a line had to be drawn or the industry would not survive.

Referring to community impact, Mr McNab made comparisons between aquaculture and wild fishing. He stated that wild fishing communities had existed for hundreds of years and that genuine fishing communities, such as Carradale, Tarbert, and many in Ayrshire, had been built by fishermen themselves, long before corporate entities existed. The income generated by fishermen had always remained within these communities, and this continued to the present day. He argued that Argyll and Bute had lost many millions of pounds over the last 15 years due to the decline of the fishing industry, as money that had once circulated locally had now disappeared. He contrasted this with Mowi, stating that while Mowi provided some local employment, its profits flowed to a multinational company. In his view, aquaculture attempted to “buy community,” whereas fishermen were the community itself.

He concluded his remarks by reiterating that the fishing industry could not absorb further loss of grounds and that the cultural, economic, and historical importance of wild fishing must be recognised and protected.

## **SUPPORTERS**

There were no supporters present in the meeting.

## **OBJECTORS**

Mr James Anderson stated that Mr McNab had spoken at length already, but he wished to make one further point. He explained that he had employed five men on his boat over the past 42 years, all of whom were local fishermen and members of the local community. He emphasised that everyone working on his vessel was from Carradale; none came from outside the area. He contrasted this with Mowi, which he stated employed only two people locally. He concluded his remarks briefly, noting that this was all he wished to add.

Ms Kearns stated that the points made by Ms Whyte and Mr McNab had been expressed perfectly, but she wished to add a brief contribution from the perspective of her organisation. She explained that her company was one of the larger seafood processors in the UK and was heavily reliant on the nephrops fishery around the British Isles. She reported that the business had achieved a turnover of approximately £67 million in the previous year, and that roughly 8% of its overall products consisted of scampi. She noted that, through the course of this process, her company had been notified that there could be potential impacts on its seafood suppliers, including Producer Organisations across the UK. Ms Kearns added that she did not have further data to provide, and that these were the main points she wished to contribute.

## **MEMBERS' QUESTIONS**

Councillor Armour asked Ms Whyte for clarification regarding the vessels under 12 metres in length. He referred to the statement that 64% of vessels were under 12 metres and sought confirmation as to whether this figure represented only CFA members or whether additional non-member boats also fished in the area.

Ms Whyte confirmed that the figure included both CFA members and non-members. She explained that some nomadic vessels also worked in the area at times, including boats from Northern Ireland, although fewer tended to operate around Carradale specifically. She stated that if the boats currently fishing there were displaced, this would, in turn, displace vessels travelling from other areas as well. She reiterated that among the under-12-metre fleet, some boats were CFA members and others were not.

Councillor Armour then asked whether these under-12-metre vessels had been included in the tracking data provided to the Council. Ms Whyte confirmed that they had not. He went on to ask whether the smaller vessels tended to fish closer to the shore than larger boats. Mr McNab responded on behalf of the fishermen, explaining that while smaller vessels usually did work closer to the shore, this was not possible at this particular location due to the presence of the fish farm. Moving closer would bring them into contact with the farm's anchor system. Mr McNab stated that comments within the Poseidon report suggesting that the seabed adjacent to the fish farm was "unfishable" were incorrect. He explained that modern fishing gear, such as rock-hopper gear, allowed vessels to work grounds close to structures. However, fishermen deliberately avoided getting too close to fish-farm anchors because snagging them posed a severe risk. If a vessel caught an anchor, it could lose a full day or more attempting to retrieve gear, and in some cases the gear might have to be cut away. More critically, he stated that if the weather deteriorated and a vessel remained attached to a seabed anchor, the situation could become extremely dangerous and potentially life-threatening. For safety reasons, fishermen avoided anchors at all costs.

Councillor Armour noted that the tracking data the committee had seen appeared to show only one vessel using the area over the recorded three-month period. He sought confirmation that this did not reflect the true activity in the area, as AIS data excluded under-12-metre vessels. Ms Whyte confirmed this, adding that the CFA had provided

tracking information for multiple boats, not only one. She stated that tracks had been submitted for several vessels over the years, including those operated by James Anderson and John Brown, among others.

Councillor Brown then asked about the number of creel boats operating locally, noting repeated references to under-12-metre creel vessels in the area. Mr McNab confirmed that three creel boats were based in Carradale. She asked how many boats from outside the area also fished there. Mr McNab stated that two creel boats came from Campbeltown and a couple from Tarbert also worked in the area. He confirmed that none of these vessels had been included in the tracking dataset used in the report

Councillor Brown asked a question regarding the consultation process. She noted that reference had been made to involving a wide range of people during consultation and asked how much engagement had taken place specifically with members of the local community who were not fishermen. Ms Weeks responded that, as shown in the presentation, there had been five local vessels represented, all of which were prawn-creeling boats under 12 metres, included in the additional plotter data submitted beyond the Poseidon report. They clarified that the area in question extended across a wide section of East Kintyre, not only Carradale village but the full stretch along the shoreline up towards the old port.

Councillor Brown asked whether there had been broader local consultation—for example, going door-to-door in the area or asking residents to complete a survey form—and whether any such steps had been taken. Mr Laird responded that, while discussions had taken place with local residents, there had not been a formal process involving public notice boards or similar methods, as suggested in the question. Mr MacIntyre explained that extensive discussions had indeed taken place with the community. This included holding open days in the village, two of which had been attended over the course of the application period. At these events, many local residents had viewed the plans. It was stated that the applicant had connected directly with over 100 local people during these events.

Councillor Armour asked a further question, directed initially to representatives of Mowi and subsequently to the objectors and Ms Whyte. He noted that Mowi had stated they could not extend the site towards the shore due to depth constraints, which he accepted. He then asked whether consideration had been given to extending the site northward rather than eastward. He indicated he would also seek views from the objectors on whether a northern extension would have created more or fewer problems than the proposed eastern extension.

Ms Weeks responded that, in configuring the proposal, the intention had been to align the extended farm as closely as possible with the existing site layout. The design involved two strings of pens, and feedback had been received from fishermen indicating that productive fishing grounds lay both to the north and south of the current site. For that reason, Mowi had attempted to maintain the existing northern and southern boundaries. The representative noted that there were good nephrops burrowing grounds in those directions, and therefore extending northward or southward had not been pursued.

Councillor Armour then asked the objectors whether an extension to the north, rather than the east, would have posed problems for the fishing industry. Mr McNab began to respond, stating that such an extension would create difficulties for both scallop dredgers and creel fishermen, and also wished to note personal experience of fishing inside the fish-farm boundaries. However, the Chair intervened to remind participants that the

meeting was at that point taking questions from members only and asked participants to follow the established procedure. Councillor Armour indicated that he was content to pause his line of questioning for the moment but intended to return to the matter later.

Councillor Philand noted that the Committee had heard from fishermen about the potential dangers posed to boats and personnel. He asked what assessment the Council had carried out regarding the risks that had been highlighted. The Chair advised that the question should be addressed by the planning officers and passed the matter to Ms Gould. Ms Gould explained that safety considerations were assessed under Policy 28 of the Local Development Plan 2, which covered navigational impact. She stated that any changes to the fish-farm layout would require enhanced navigational marking, which was standard practice for marine fish-farm developments. She added that the Northern Lighthouse Board had specifically requested such measures to ensure navigational markers were clear and could be easily avoided by other vessels. She further referred to mitigation offered by the applicant, noting that some smaller vessels, particularly creel boats, were not included in AIS data and sometimes operated closer to fish-farm boundaries. The applicant had offered to share coordinates with these fishermen and to maintain ongoing liaison to manage safe access for vessels working in close proximity to the site. Ms Gould also highlighted that, as stated earlier by the Clyde Fishermen's Association, there had been no safety issues recorded at this site or involving this operator.

The Chair asked Councillor Philand whether this answered his question. Councillor Philand said that it did in part but that he wished to address a further question to the Clyde Fishermen's Association. He noted that although there had been no incidents at this site to date, concerns had been raised about the risks associated with fish-farm cages moving, and he wished to hear the fishermen's views on whether this would create a safety issue. Ms Whyte of the Clyde Fishermen's Association responded that the lack of previous incidents at this particular site did not eliminate the inherent risk. She explained that the closer fishing vessels were required to work to fish-farm anchors, the higher the danger became. She noted that the proposed extension would encroach into ground currently towed by fishermen. She also reported that in June of the previous year, a fisherman had contacted them after becoming fast on an anchor elsewhere in the region, resulting in a situation close to a sinking and posing a serious risk to life. She emphasised that adequate space between fishing activity and fish-farm infrastructure was essential for safe coexistence. She added that if fishermen were forced eastward, they would encounter both rock-dump and subsea cables, which also posed snagging hazards. She stated that safety concerns therefore existed in multiple directions and that the current arrangement worked only because there was presently enough room for both sectors to operate without compromising safety. Councillor Philand thanked all contributors for their responses.

Councillor Hardie asked the Clyde Fishermen's Association whether, if the application were to be granted, they anticipated job losses within the local fishing community. Ms Whyte responded that the situation in the Clyde was already extremely challenging, noting that, as Mr McNab had previously stated, the industry had lost a significant amount of fishing ground, a large number of boats, and many jobs over recent years. She explained that the sector was working hard to reverse this decline, highlighting that the Association had developed an economic vision for the area and was actively training young people to enter the industry. She stated that the proposal could indeed cause difficulties. She reported that one creel fisherman in Carradale had already spoken about the possibility of emigrating to New Zealand due to the accumulated pressures, including recent Clyde closures. She emphasised that it was often the cumulative impact of multiple restrictions that pushed fishermen to the point of leaving the industry altogether. Ms Whyte concluded

that, given the increasing pressures on fishing grounds and the overall cumulative squeeze, the proposed development could contribute to further losses, with some fishermen potentially deciding that it was no longer safe or viable to continue working in the area. She stressed that this was the last outcome the community wished to see.

Councillor Kennedy Boyle referred to page 14 of the report, which stated that the Fish Health Inspectorate (FHI) had expressed concerns regarding the welfare of young fish and their ability to withstand currents and environmental conditions. She noted that no veterinary health and welfare plan had been provided and asked whether the new location posed more or less risk to smaller fish being held in deeper waters. Ms Weeks responded that the proposed location did not present any change in risk with regard to currents. They explained that enhanced fish-health management would be achieved through having fewer units to manage, rather than through any change in water depth.

Councillor Kennedy Boyle then referred to page 18 of the report, which mentioned benefits on the west side for local creel fishermen but did not detail what those benefits were. Ms Weeks stated that at the initial Teams meeting with the Clyde Fishermen's Association (CFA), it had been indicated that creel fishermen were actively using the inshore side. At that time, the applicant had been asked to share mooring extents, which they did in November 2024. However, through further conversations, it became clear that creel vessels were not using the inshore area but were instead operating mainly to the north and south of the existing pens. This led the Councillor to ask whether the eastward movement of the farm — initially proposed to benefit creel fishermen — was still required. Ms Weeks responded that the larger pens required a deeper sidewall to achieve increased volume and reduced stocking density. Due to seabed topography, they could not move further inshore, meaning the eastward extension remained necessary.

Councillor Kennedy Boyle continued by referring to the Poseidon report, which noted there was "very little margin for error in navigation." She observed that the Royal Yachting Association described the channel as busy, particularly during the sailing season, and noted additional marine traffic associated with undersea cable maintenance and MOD activity. She asked whether the increased infrastructure would heighten the risk of containment breaches due to collisions, and whether this had been assessed. Ms Weeks responded that the proposed extension measured 175 metres at its greatest extent. She explained that, as shown both in the Google Earth visualisation and at the site visit, this constituted a small change relative to the overall width of the sound. For vessels transiting between the site and Carradale Harbour, a distance of 1.8 kilometres, adjusting course by 175 metres represented only a minor navigational change. Mr MacIntyre added that the Northern Lighthouse Board had been consulted and had provided navigational advice. They had also requested additional navigational marking beyond what had already been proposed.

Mr Anderson offered further perspective, explaining that when towing gear northwards up the Kilbrannan Sound, fishing vessels had right-of-way over sailing yachts under navigational rules. He stated that fishing vessels could not move eastward due to the presence of hard rock seabed and therefore could not avoid the fish-farm site easily when meeting other marine traffic. He also noted that while creelers used static gear in some circumstances, towing gear near the fish farm created substantially more risk than working with static gear.

Councillor Kennedy Boyle then asked about condition 10, relating to notification of fish movements. She recalled operational information provided during the site visit indicating that fish were dynamically assessed, with larger fish removed and transferred to another

site for finishing. She asked whether the condition covered this process. Ms Gould confirmed that it did, explaining that the condition included harvesting, fish deliveries, and well-boat visits. The purpose of the requirement was to maintain records so that the Council could cross-check any amenity impacts, such as excessive vessel movements. She added that having fewer, larger pens should reduce the frequency of large-vessel visits.

Councillor Armour then referred to condition 18, which required the applicant to establish a forum for operational communication with local vessels, including CFA members, and to agree a fisheries-management mitigation strategy “if deemed necessary.” She asked who determined whether such a strategy was necessary. Ms Gould responded that this would be decided by agreement between the parties. She clarified that the phrase referred to the creation of a large-scale, formal strategy. Ongoing liaison would occur regardless, but a full strategy would only be required if considered necessary in line with the National Marine Plan. She emphasised that the National Marine Plan set out a detailed process for engagement and data-sharing where conflict existed. Ms Weeks added that if one party felt a strategy was necessary, then it would proceed on that basis.

Councillor Armour noted that the applicant had described meetings as productive and asked Ms Whyte whether she agreed. Ms Whyte stated that communication had improved and that discussions had been civil, but the material issues remained unchanged. She referred to policy requirements to minimise impacts on wild fisheries and argued that the proposal did not satisfy those requirements. She stated that the CFA believed coexistence currently worked, but the proposal would push fishermen into unsafe areas and result in a loss of fishing ground. She acknowledged that Mowi had made efforts to engage and mitigate impacts, but stated that some impacts could not be mitigated.

Councillor Armour asked, for the benefit of those unfamiliar with fishing, what would be lost if the area were extended. Mr McNab explained that prawns lived in the mud and emerged only when conditions aligned such as tide, weather, and light levels. The area in question was one of the most productive prawn grounds, as confirmed by both fishermen’s camera gear and Marine Scotland Science surveys. Removing that area would take highly productive ground out of use. They added that when trawling out of Carradale, gear was rigged for a specific depth. Deviating around an obstacle meant the gear would stop fishing effectively until the correct depth was regained. Although the extension appeared small, the impact on fishing operations over a year could amount to substantial financial loss across several boats. They emphasised that navigation around gear and obstacles required constant attention and advance planning, and that the impact could not be dismissed as minor.

Councillor Kennedy Boyle referred to page 44, paragraph 3.37 of the report, which suggested that further work could be undertaken regarding the use of mobile gear east of the site. She asked how any changes identified in such work would be managed if the application were approved. Ms Gould clarified that any changes would relate to operational practices and communication rather than material changes to the consented works. Ms Weeks confirmed that they had nothing further to contribute. Ms Gould concluded by stating that condition 18 required ongoing liaison and ongoing compromises, and that this was the mechanism intended to manage such issues.

Councillor Dougie Philand declared a non-financial interest in the proceedings at this point by virtue of his appointment to the Northern Lighthouse Board in his role as Provost. He advised that he intended to withdraw from the meeting and not take part in the debate and deliberation of the application. Councillor Philand left the meeting at this point.

Councillor Brown asked a question regarding the welfare of the fish. She noted that much had been made of the proposal improving fish health through the use of larger pens, providing more space and better conditions. She asked whether these changes resulted in a reduction in mortality rates within the pens. Mr Jones responded that the Carradale site was already a strong performer, with an average fish survival rate of approximately 96% over the previous five years. He explained that they could not specify expected future survival rates for the new pen design at this site, but stated that the company, now over 60 years old, sought continual improvement. He noted that experience at other locations with similar larger pens had shown low mortality rates and good yields, forming part of the rationale for progressing the proposal.

Councillor Brown asked a follow-up question, noting that the company had argued that giving fish more room and reducing crowding improved welfare. She observed that the same overall number of fish would be stocked and asked how mortality rates compared at other farms that already used these larger pens. She queried whether the reduction was significant or marginal.

Ms Weeks explained that the company operated these larger pens at 12 other locations in Scotland and had observed improved site performance. She stated that the improvements related not only to fish health but also to operational efficiency. Each pen was treated as a single management unit for health interventions, meaning that tasks such as fish-health checks, gill-health checks, sea-lice counts, and net inspections had to be carried out in every pen. By consolidating the same number of fish into fewer, larger pens, daily tasks were reduced from ten pens to six, and treatment periods were similarly reduced from ten days to six.

Councillor Brown acknowledged the explanation but clarified that she was trying to understand whether measurable reductions in mortality had been recorded at sites where pen size had already increased, given the commercial importance of maximising harvestable fish. Ms Weeks responded that mortality rates were site-specific and therefore projections could not be provided in advance. Mr MacIntyre added that there had been a general trajectory of improved performance at sites where larger pens had been introduced. In particular, they had observed reductions in sea-lice levels and improvements in fish-health outcomes, including interactions with wild salmon, at several of the upgraded locations.

Councillor Howard asked a question regarding the proposed larger pens. She stated that while the increased pen size appeared beneficial in providing more space for the fish, she wished to understand how it could be guaranteed that the larger pens would not subsequently be used to justify an increase in stocking levels. Ms Weeks responded that they were not seeking any increase in biomass. She explained that biomass levels were controlled through a separate authorisation process regulated by SEPA, and that any increase would require a distinct SEPA application. She confirmed that although a change in layout had been submitted to SEPA, it sought to maintain the existing maximum authorised biomass, not increase it.

Councillor Kennedy Boyle asked a further question regarding the operational benefits of the proposed development. She noted that the applicant had referred to greater efficiencies arising from the larger pens, including improvements in sea-lice management and fish health. She referred to the statement that approximately 20 employees were currently associated with the site and asked whether those 20 jobs would be maintained going forward. Mr MacIntyre confirmed that the 20 existing jobs would be retained. He

added that, as discussed earlier, there were two residents of Carradale employed at the site, and suggested that Mr Laird might wish to comment further on local staffing. Mr Laird explained that the Carradale operation currently had three managers and two vessels, with a total staff complement of 20. He stated that all 20 staff would continue to be required with the new 12-pen layout. He added that, while only a small number of staff lived in Carradale itself due to the village's ageing population, the wider workforce was drawn from across Argyll, including individuals from Ardrishaig, Campbeltown, and Tayinloan.

Councillor Kennedy Boyle then asked about biomass, seeking clarification on the site's current authorised capacity. Ms Weeks confirmed that the site held a SEPA-authorised maximum biomass of 2,500 tonnes. She asked whether this figure represented the site's full operational capacity or whether the site could support a higher biomass. Ms Weeks stated that the site was environmentally dispersive, meaning that, in principle, higher levels of waste dispersal might be supportable. However, the current application did not seek any increase in biomass. Councillor Kennedy Boyle asked whether, should the applicant wish to increase biomass in the future, now that the site would have larger pens, this would require a separate process and an environmental impact assessment. Ms Weeks confirmed that any future biomass increase would require a separate SEPA application along with all associated environmental analysis. Mr MacIntyre further stated that the company's long-term investment plans for the site did not include any intention to increase biomass at Carradale.

Councillor Blair referred to the report and asked the planning officers to confirm that the statutory consultees, of which there were many, had raised no objections to the application. He also asked whether those statutory consultees considered matters relating to health and safety, fish husbandry, and other issues discussed during the hearing. Ms Gould confirmed that all statutory consultees had responded without objection, and that each consultee assessed the application in line with their regulatory remit, including matters of health and safety, fish-welfare considerations, and other relevant environmental or operational issues.

Councillor Blair then directed a question to the applicant. He observed that the company had described future operational enhancements at the site and asked whether, as an organisation planning ahead, it anticipated any further improvements that would help meet future regulatory or technological requirements. He commented that the site visit had been valuable, particularly for members less familiar with marine operations. Mr MacIntyre explained that, with respect to Argyll, their current investment focus included improvements at Carradale Harbour. He noted that one reason the site visit could not depart from Carradale was the absence of safe sea access, which the company hoped to address through a new pontoon arrangement and further harbour-side improvements, including renovation of the pier house. He also outlined a potential future development at Sanda Island, which was still at an early stage and had not yet reached the application phase. At present, this was the only other development under consideration in Argyll.

Councillor Blair then posed a question to the consultees and objectors. He asked whether the fact that all statutory regulatory bodies had raised no objections offered any reassurance, given that these organisations assessed safety and environmental issues rigorously. Ms Whyte responded on behalf of the Clyde Fishermen's Association. She acknowledged that statutory consultees had raised no objections but observed that fishing vessels themselves were also licensed and regulated, and that the fishing sector likewise received no statutory objections to its operations. For that reason, she considered both industries to be in a similar position, with neither having regulatory objections to their

activities. She emphasised that the absence of objections from statutory consultees did not alleviate fishermen's concerns regarding snagging hazards, safety risks, or loss of fishing ground, which remained material regardless of procedural compliance.

Councillor Blair commented that during the site visit he had been impressed by the professionalism of Mowi staff and likewise by the professionalism of the fishermen who had presented at the hearing. He said he took reassurance from the high standards demonstrated by both sectors and asked again whether this gave any comfort to the objectors. Ms Whyte responded that while she appreciated the professionalism shown, she remained concerned about unresolved environmental and safety issues. She noted that the CFA had highlighted previous procedural issues involving another site, not the one under consideration, but emphasised that similar regulatory processes would apply. She advised that the CFA had invited the Council to visit fishing vessels as well, as understanding both industries' operations was essential when making decisions that could displace fishermen who were actively working in the area. She highlighted that fishermen such as Mr Anderson employed multiple crew members and that observing fishing operations first-hand would allow councillors to appreciate the reality of the potential impacts. She added that although communication with Mowi had improved and discussions had been civil, this did not alter the material policy issues or the CFA's belief that coexistence currently worked but would be compromised by the proposed extension. Councillor Blair, speaking as Chair, acknowledged the point and reiterated that the purpose of the hearing, and the site visit requested by Councillor Armour, was to ensure members had full understanding of the issues.

Councillor Armour clarified that, at the previous meeting, it had been the hearing that he had proposed and advocated for. He noted that he had commented at the time that a site visit might not prove significantly beneficial, but that the request he had pressed for was specifically the holding of a hearing. The Chair apologised for having previously misstated this and acknowledged the correction. The Chair added that, on a personal level, he had found the site visit advantageous, as it had allowed members to better understand the operation and context of the site.

Councillor Hardie asked the applicant about staffing. He noted that Mowi had stated it employed 20 staff members, several of whom lived within Argyll and Bute, and he asked whether staff travelled into the area for work or whether some had settled within the local community. Mr Laird sought clarification of the question and confirmed that staff lived in a range of locations. He stated that approximately four staff members travelled daily from Ardrishaig and Lochgilphead. The remainder were based in Tayinloan, Carradale, and Gigha. One staff member worked on a two-weeks-on, two-weeks-off rotation and travelled from Oban, while another two employees also travelled from Lochgilphead. In addition, two staff members were based outside Argyll and Bute, commuting from Glasgow. Councillor Hardie thanked the representative and confirmed he had no further questions. Mr MacIntyre added that one element of the company's long-term plans included renovation of the fire-damaged pier house at Carradale Harbour. The intention was to convert the building into staff accommodation, enabling employees to live within the community and strengthening the company's connection with the Carradale community.

Councillor Hampsey referred to the earlier comment that an offer had been made for councillors to visit one of the fishing vessels. She asked where that offer had been sent, as she did not recall seeing any such invitation. Ms Whyte indicated that she had sent the invitation to Ms Gould. Ms Barton confirmed that the Council had indeed received the Clyde Fishermen's Association's invitation. She explained that the purpose of the site visit agreed at the December meeting had been specifically to view the fish-farm site boundary,

not to observe operational activity or engage with any party during the visit. The committee therefore accepted the offer from Mowi first, solely to allow members to view the site itself. No discussions with representatives took place during that visit, in line with the agreed procedure.

Councillor Hampsey thanked Ms Barton and noted that she personally would have been willing to take up the fishermen's invitation, as she believed it would have offered an additional and valuable perspective to aid understanding.

The Chair thanked Councillor Hampsey and expressed disappointment that she had been unable to attend the arranged site visit due to availability. He emphasised that coordinating attendance for all members could be challenging. He reiterated that the visit undertaken had been limited strictly to viewing the site and not to consider operational matters, which were being examined during the hearing.

Councillor Hampsey replied that she fully understood this distinction and clarified that her earlier point related not to the site visit itself, but to the missed opportunity for members to also observe fishing operations separately.

## **SUMMING UP**

### **Planning**

#### **Sandra Davies, Major Applications Team Leader**

Ms Davies summed up by saying that, in their consideration of the proposal, members had been made aware of arguments both supporting and opposing the replacement of the existing 10 x 120-metre circumference pens with 6 x 160-metre circumference pens. She noted that members had also heard wider debate concerning the management of shared marine space and potential conflict between different elements of the proposal, particularly in relation to cultural factors, the fishing industry, salmon farming, and local commercial fishing interests.

Ms Davies reminded members that the planning system existed to balance competing demands and to ensure that land, and in this case, the marine environment, was used and developed in the public's long-term interest. Effective planning decisions, she stated, should contribute to sustainable economic growth, which was identified as the main purpose of the Scottish Government. To achieve this, planning decisions were required to strike a careful balance between supporting economic development and providing appropriate protection to the environment and local communities.

She emphasised that, notwithstanding the ongoing national debate about the current state and future of salmon farming in Scotland, finfish farming remained a legitimate activity which continued to be promoted by the Scottish Government in recognition of the economic and social value the industry brought to rural and island communities. This included job provision, community investment, and supply-chain stimulation at both local and national levels. Support for the sustainable expansion of aquaculture was also reflected in the Council's own economic development strategies. She highlighted that this was an existing operational site, not a new development.

Ms Davies explained that national discussions on aquaculture were centred on the requirement for sustainable development that maintained a balance between fish-farming activity and a healthy, functioning marine ecosystem. The Scottish Government had

identified that effective regulation, informed by the best available science and evidence, was essential to ensure development took place within environmental limits and with regard to animal health and welfare, biodiversity, other marine users, and communities. In the present case, no increase in biomass was proposed, and no concerns had been raised by statutory consultees with respect to environmental amenity, biodiversity, or navigational safety.

She noted that the principal objections related to the proposed upgrade of the cages and the alleged loss of fishing grounds. The applicant had advised that the proposal represented a significant investment in the local area, which would retain stable local employment and improve fish health as well as operational safety at the site. The development would also continue to support the wider supply-chain economy, including existing marine businesses in Argyll and Bute.

In relation to objections raised by local fishermen about loss of fishing grounds, Ms Davies stated that little empirical evidence had been provided to quantify this loss. Evidence submitted by the applicant indicated that the seabed immediately adjacent to the site would not be suitable for trawling or dredging. For creeling or potting activity, the applicant had confirmed a willingness to facilitate safe access to the pens wherever possible, to be secured through planning conditions. She added that an ongoing liaison mechanism had been proposed to support communication between the operator and fishing interests.

Ms Davies noted that the Clyde Fishermen's Association had been critical of the Poseidon report submitted by the applicant; however, the criticisms had primarily been anecdotal and lacking supporting evidence. In contrast, East Kintyre Community Council and local creel fishermen had expressed support for the proposal, noting that it would not impact their fishing activity and highlighting the value of the investment being delivered by the applicant through its community fund and associated works at Carradale, including the shore base, the Pier House renovation and the new pontoon at Carradale Harbour.

She advised that the hearing had provided members the opportunity to hear directly from the applicant, consultees, and third parties, and to seek clarification on the matters requiring consideration in determining whether planning permission should be granted. The proposal represented a minor relocation of the site centre within revised mooring boundaries and formed part of a wider modernisation programme offering benefits in fish health, operational efficiency and the safety of site workers. The development supported a key local employer and contributed to the local, regional and national economy.

Commercial fisheries impacts had been fully assessed, and the proposal had been redesigned to minimise effects on fishing activity. Mitigation measures were proposed and would be secured by planning conditions. The local Community Council supported the modernisation as part of wider investment in Carradale Harbour, recognising the importance of safeguarding local jobs and community benefits.

Ms Davies reminded members of their obligation under Section 25 of the Town and Country Planning (Scotland) Act, to determine planning applications in accordance with the development plan unless material considerations indicated otherwise. For aquaculture developments, the relevant development plan policies were NPF4 Policy 32 and Policy 28 of the Argyll and Bute Local Development Plan 2024, both of which set out criteria to be applied in assessing the application.

Despite the issues raised by the Clyde Fishermen's Association and other third parties, officers considered the development to be consistent with NPF4 Policy 32 and ALDP2 Policy 28, and compliant with other relevant policies. The National Marine Plan was a material consideration, and commercial fisheries matters had been addressed in a manner ensuring that impacts were mitigated and not significantly adverse so as to justify refusal.

Accordingly, Ms Davies commended the proposal to members for approval, subject to the conditions and reasons set out in the report to the Planning, Protective Services and Licensing Committee dated 1 December 2025, as well as the revised Condition 18 contained within Appendix C of Supplementary Report No. 2 dated 26 February 2026.

### **Applicant**

#### **Stephen MacIntyre, Head of Environment, Mowi Scotland**

Mr MacIntyre addressed the Committee, explaining that the proposed changes were intended to deliver a range of operational benefits for the fish farm at Carradale. The upgrade would future-proof the site, improve fish health and husbandry, and support more streamlined and efficient operations. He advised that these improvements would underpin the 20 existing jobs on the site and help secure them for the future.

Mr MacIntyre acknowledged the concerns expressed by fishermen and fishing interests. However, he respectfully pushed back against any suggestion that they had approached the matter in an arrogant manner, stating that they had sought throughout to engage proactively and constructively. It was noted that Mowi, and several members of the team, had a personal affinity with the fishing sector and understood its historic and ongoing importance to coastal communities. Mr MacIntyre stated their belief that the two industries could continue to coexist, as the farm was already doing at present.

Reference was made to earlier discussion regarding data, confidence in data, and suggestions of missing information. Mr MacIntyre stated that, in addition to technical reports, the company had extensive observational information arising from the presence of staff on site almost every day of the year. These staff included former fishermen who had long experience of the local grounds. He invited a colleague, Mr Laird, to provide further comment.

#### **Mark Laird, Carradale Site Manager, Mowi Scotland**

Mr Laird advised that, on a daily basis, staff did not observe fishing vessels working within the area proposed for the new pens. He stated that two staff members, both ex-fishermen who had worked in the Carradale area for 15 years, had confirmed that the seabed in the proposed location was not ground typically used for fishing. He added that the only fishing activity normally observed was within the 100-metre depth zone, as previously illustrated to the Committee. Mr Laird further explained that the company regularly engaged with local fishing vessels, including those operating north and south of Carradale, and that none of those individuals had raised objections in the course of those discussions.

#### **Stephen MacIntyre, Head of Environment, Mowi Scotland**

Mr MacIntyre reiterated that, irrespective of the outcome of the hearing, they would continue to engage proactively and constructively with local fishing interests. He noted that further opportunities for collaboration existed through the company's planned renovation works at the harbour.

In conclusion, he advised that Mowi maintained their position that the proposal represented a minor change to a long-established fish farm, and that the evidence presented did not support the contention that the development would result in displacement effects on fishing vessels of any size.

## **Consultees**

### **Elaine Whyte, Clyde Fisherman's Association**

Ms Whyte summed up on behalf of the Clyde Fishermen's Association (CFA). She stated that it felt "slightly like being in a parallel universe", as her understanding was that around twelve local fishermen had submitted individual objections in addition to the formal objection from the CFA. She therefore considered it clear what local fishermen thought of the proposal, noting that "by and large" they had indicated that they did have an issue with it. While she recognised the importance of maintaining good relationships between sectors, she stressed that discussions had to be grounded in reality, and the reality was that there were objections to the proposal.

Ms Whyte referred to comments about staffing levels at the fish farm and noted her understanding that there were normally two staff continually on site. She questioned whether staff numbers would change and suggested that, if employment levels at the site were to be maintained or increased, that could in turn impact local fishermen's employment opportunities. In her view, this amounted to displacement, and while the aquaculture operator might gain or retain jobs, the consequence for local fishermen could be a loss of employment.

She emphasised that discussions had focused heavily on salmon, but it was important to remember the value of the area's langoustines and scallops, which she described as some of the finest, exported to France, Spain and Italy as well as being consumed domestically. These fisheries, she argued, were a vital asset, and if the fishing fleet were eroded, the associated markets would be lost. Maintaining resilience across sectors was important, as industries fluctuated over time, and a balanced economy provided stability. She stressed that the community should avoid "throwing the baby out with the bathwater". Ms Whyte then invited fishermen present to speak, indicating that CFA members themselves should have the final word regarding their concerns.

### **Kenny McNab, Chair of Clyde Fisherman's Association**

Mr McNab expressed disappointment at comments made earlier in the meeting, particularly those from the applicant regarding fishing activity. He stated that he had fished for 55 years and had not attended the hearing "to get a lecture on fishing". He expressed concern over the Poseidon Report, describing it as containing anomalies that appeared to have been accepted as fact. He questioned how a report could be carried out as a desktop exercise without interviewing Clyde fishermen, noting that no approach had been made to them for comment.

Mr McNab further stated that, in his view, the information contained in the report was "a load of nonsense" from a fishing standpoint. He explained that the suggestion fishermen could not tow gear towards the fish farm was incorrect; they currently avoided the area not because of seabed type, but because of the risk of catching an anchor. He noted that the ground in question was actually harder on the opposite side of the Sound than on the side discussed in the report, and therefore the conclusions reached were "complete nonsense". He also expressed disappointment at comments made regarding investment in Carradale. He questioned why comparisons were being drawn between the harbour investment and the present planning application. He understood the applicant to have stated that the harbour investment would proceed regardless of the outcome, and therefore felt it was

misleading to imply that the two matters were linked. He said the suggestion that the investment depended on approval of the extension was “completely untrue”.

### Elaine Whyte, Clyde Fisherman’s Association

Ms Whyte added a final point, stating that while the applicant had spoken of operational improvements to the moorings, these changes would create operational issues for fishermen who already faced challenges navigating existing constraints. Areas previously fished were already avoided, and the proposed development would increase those difficulties.

She also questioned the planning recommendation, noting that although he was not a planning expert, she had reviewed the reports and identified areas where, in his view, the application contravened national and local planning policy. He stated that these concerns had been highlighted in materials sent to members. She emphasised that beyond economic issues such as market loss and supply-chain impacts, the most significant matter for him was safety, stating that fishermen “cannot keep cutting out safe grounds”.

### **Supporters**

None

### **Objectors**

Ms Kearns summed up on behalf of her business as a nephrops processor. She highlighted the company’s significant dependence on the UK nephrops fishery, particularly landings from Scotland. She advised that this fishery was already experiencing considerable pressure due to spatial squeeze and displacement, and she stressed that any further loss of access to fishing grounds could have notable consequences. Ms Kearns stated that the proposed extension to the fish farm had the potential to affect the seafood supply chain for her processing business, in addition to impacting the fishermen who operated in the area and the members of the Clyde Fishermen’s Association. She wished to ensure that these points were clearly reiterated before the Committee reached its decision.

The Chair sought confirmation from all parties that they had received a fair hearing.

Planning Officers confirmed that they had received a fair hearing.

The Applicant confirmed that they had received a fair hearing.

Ms Whyte on behalf of Clyde Fishermen’s Association confirmed that they had received a fair hearing on this occasion, but expressed disappointment that members had not taken up the invitation to visit the fishing boats, noting that both the Association and local fishermen had extended this offer. They stated that such visits would have been “instrumental” in assisting members to understand the nature of the fishing businesses. They added that only a site visit to the fish farm location had taken place.

Mr McNab was asked if he had received a fair hearing. He replied no, stating that he had not.

Mr Anderson was then asked the same question and also indicated that he had not received a fair hearing.

The Chair then sought confirmation from Ms Emma Kearns. Ms Kearns confirmed that she believed she had received a fair hearing at the meeting.

The Committee adjourned for lunch at 1.15pm.

The Committee reconvened at 1.45pm with all those present as per the sederunt, with the exception of Councillor Philand who had declared an interest and left the meeting earlier in the proceedings.

At this point in the meeting, Councillor Kennedy joined the proceedings. He was advised by the Chair that, as he had not been present for the earlier part of the consideration of Item 3 on the agenda, he would not be able to participate in the decision-making process for the remainder of that item. He was further advised that he would be able to participate in Item 4, as this concerned a separate application. Councillor Kennedy confirmed that he was content with this arrangement.

## **DEBATE**

Councillor Hardie thanked the Chair and all participants for their contributions to what he described as an interesting and informative debate. He advised that he had listened closely to the arguments presented by all parties and had carefully considered the merits put forward on both sides. He stated that the nature and clarity of the communication received in support of, and in objection to, the application had led him to the view that he wished to approve the application.

Councillor Armour thanked the Chair and stated that he had listened carefully to all parties who had spoken during the hearing. He commented that he had been very impressed by the presentations and the contributions made by everyone involved. He noted, however, that unlike Councillor Hardie, he had some concerns regarding the Community Council's position. He explained that he would have welcomed their attendance at the hearing to clarify how they had engaged with the wider community and how community views had been gathered. He felt that, if the submission represented only the views of the Community Council members themselves, without wider consultation, that was a matter of concern. He stated that hearing directly from the Community Council about the community's views would have been valuable, and he was disappointed that this had not been possible. He acknowledged that attendance was at their discretion but reiterated that their input at the hearing would have been helpful. Councillor Armour also expressed concern about the fact that vessels under 12 metres were not included in the vessel-tracking information presented during the process, stating that this omission troubled him. He concluded by noting that these issues raised concerns for him, but he remained open to hearing the views of other members before reaching his final decision.

Councillor Green thanked the Chair and stated that, like Councillor Hardie, he had appreciated hearing all the different viewpoints presented during the hearing. He advised that, having considered the information carefully, including the benefit of attending the site visit, his view was that the proposal represented a relatively small change from the existing arrangement on site. Councillor Green stated that he could see no substantial reason to refuse the application and was therefore minded to support approval.

Councillor Brown thanked all those who had presented, stating that the presentations had been informative and she had appreciated them. She noted that there had been a significant number of questions and answers throughout the hearing, but also some

questions for which she felt the answers had not fully addressed the points she was seeking clarity on. She advised that she had greatly benefited from the site visit, including the trip by boat which had taken members as close to the existing pens as was permitted. This had allowed her to understand both the current positioning of the pens and the location to which they were proposed to be moved. She commented that, although the proposed move was around 97 metres, she did not consider it to be a substantial shift. Councillor Brown stated that she was not yet fully convinced and wished to take a little more time to reflect before reaching her final determination. She confirmed that she would “hang fire a wee bit longer” before making her decision and thanked the Chair.

Councillor Kennedy Boyle stated that she echoed earlier comments regarding the quality of the presentations, noting that they had been extremely worthwhile. She thanked all contributors for their patience in responding to the various questions she had raised. She commented that there were clear merits within the proposal and aspects that aligned positively with certain planning policies. However, she also expressed reservations in relation to other policies, particularly those dealing with co-existence between conflicting and competing marine industries. Councillor Kennedy Boyle concluded that she was content to hear the views of other members before reaching her final decision on the application.

Councillor Blair asked whether any colleagues participating online had further comments; no additional comments were raised. He then offered his own contribution to the debate. He stated that he had found the site visit extremely beneficial and also valued the advice and professional input provided by the Council’s officers. He remarked that he was satisfied with the responses and assessments from the statutory agencies and consultees whose role was to protect all aspects of society, including local communities, businesses, and matters relating to fish husbandry and environmental considerations. Councillor Blair advised that he was content to support the application and to accept the officers’ recommendation along with the conditions set out within the report.

## **MOTION**

That the Committee support the application as per the recommendation of officers.

Moved by Councillor Gordon Blair, seconded by Councillor Graham Hardie.

## **AMENDMENT**

From the concerns raised by the Clyde Fishermen’s association I am of the view that existing commercial fishing opportunities have not been sufficiently safeguarded and this application should be refused as the increase in the total area of the development, encroaches into a valuable creel and commercial fishing area which will result in an unacceptable exclusion of commercial fishing activity from this important fishing ground which will result in a significant direct adverse effect on the commercial interests of the fishermen in this area and as such the application can be considered to be contrary to LDP2 Policy 28 and the relevant provisions of the National Marine Plan.

Moved by Councillor John Armour, seconded by Councillor Reeni Kennedy Boyle.

Councillor Hampsey offered her personal contribution and requested that her remarks be placed on record. She thanked all individuals who had presented and contributed to the hearing, noting her appreciation for input from both sides. In particular, she expressed her thanks to the Clyde Fishermen’s Association, and specifically to Mr McNab, whom she

described as a strong and effective champion of local fishermen. Councillor Hampsey stated that Mr McNab had provided a clear, informed, and grounded account of the realities faced by local fishermen, as well as the importance of safeguarding wild fishing interests. She commented that, regardless of the differing views expressed in the room on the application, she felt that Mr McNab's contribution reflected the lived experience of those whose livelihoods depended on the local waters. She emphasised that such perspectives should be given proper weight in members' deliberations on both the motion and the amendment. Councillor Hampsey concluded by thanking all contributors once again.

As the meeting was being held on a hybrid basis, the vote required to be taken by calling the roll and members voted as follows:

#### **Motion**

Councillor Gordon Blair  
Councillor Kieron Green  
Councillor Graham Hardie

#### **Amendment**

Councillor John Armour  
Councillor Jan Brown  
Councillor Amanda Hampsey  
Councillor Fiona Howard  
Councillor Reeni Kennedy Boyle  
Councillor Peter Wallace

#### **DECISION**

The Amendment was carried by 6 votes to 3 and the Committee resolved accordingly.

(Reference: Report by Head of Development and Economic Growth dated 1 December 2025 and supplementary report 1 dated 16 December 2025, supplementary report 2 dated 26 March 2026 and supplementary report number 3 dated 26 March 2026, submitted)

- 4. MOWI SCOTLAND: REPLACE EXISTING 10 X 120M CIRCUMFERENCE PENS WITH 6 X 160M CIRCUMFERENCE PENS (WITH A PARALLEL MINOR RELOCATION INTO DEEPER WATER MOVING THE CARRADALE NORTH SITE CENTRE 79M EAST) AND SITING OF EXISTING FEED BARGE IN A DIFFERENT LOCATION: CARRADALE NORTH FISH FARM, KILBRANNAN SOUND (REF: 24/01382/MFF)**

The Chair welcomed everyone to the second part of the meeting, which was held on a hybrid basis.

In advance of the meeting, interested parties confirmed they would make presentations to the Committee. Mrs Barton read out the names of those representatives and asked them to confirm their attendance.

The Chair explained the hearing procedure that would be followed and invited the Senior Planning Officer to present the case.

#### **PLANNING**

Shelly Gould, Senior Planning Officer

The Senior Planning Officer presented the application and reminded members that, at the PPSL Committee meeting on 17 December 2025, members had agreed to continue the

determination of the application for the Carradale North Fish Farm to a predetermination hearing, together with a site visit. The predetermination hearing was taking place today, and the site visit had been undertaken on 24 March 2026.

For those members who had been unable to attend, the applicant had provided Google Earth imagery. The Officer explained that the site was located approximately 1.8 kilometres north of Carradale village and harbour, on the western edge of the Kilbrannan Sound, on the eastern side of the Kintyre Peninsula. The hamlet of Grogport lay around 2.6 kilometres northwest, and the coastline adjacent to the site was designated as Countryside.

The Google Earth footage provided wider context for the existing operational fish farm, shown outlined in blue, and demonstrated its position within the Kilbrannan Sound, with Arran situated to the east. The imagery also detailed the location of the installed pens in blue and indicated the proposed mooring extent for the replacement 160-metre pens, which were outlined in red. Members were invited to note the marked contrast between the shallower depths on the eastern and western edges of the Sound, shown in darker shades, and the deeper central channel shown in a lighter colour.

The Officer explained that, although the applications for Carradale North and Carradale South were being addressed separately, as had been done earlier that morning, the issues relevant to both sites were essentially the same.

The Officer referred to additional charts submitted with the application and summarised in Supplementary Report No. 3, which had been annotated to illustrate the distances involved in the proposed eastward relocation of the new pen groupings. For Carradale North, the relocation would shift the centre of the site 79 metres eastwards, with a further 150-metre eastward shift from the current mooring boundary to the proposed mooring boundary. The moorings had been reduced on the northeastern and southeastern corners in order to lessen any navigational impacts and to maintain access for mobile-gear vessels operating near the site.

The Officer then moved on to the proposal in detail. She explained that the application formed part of a wider modernisation programme undertaken by the applicant across several sites. The existing 10 × 120-metre circumference pens, arranged in a 2 × 5 grid, were shown in blue along with the feed barge situated to the north. These pens would be replaced with 6 × 160-metre circumference pens in a 2 × 3 layout, indicated in red. The existing 650-tonne feed barge would be repositioned slightly northwards on the shore side of the grouping.

In response to concerns raised by the Clyde Fishermen's Association and by local fishermen, the applicant had submitted revised plans which reduced the moorings on the northeastern and southeastern edges. The planning boundary was shown in black, and the revised moorings were indicated in red. The mooring lines themselves were shown as eight grey lines extending toward the boundary. An Admiralty chart was shown to members which indicated that the proposed mooring extent would lie over a steeply sloping seabed descending from approximately 23 metres to 69 metres, a topography that was not well suited to most trawling activities. The deeper channel, which reached depths of around 150 metres, lay farther to the east of the proposed moorings.

The Officer then described the technical components of the proposal. The existing elevations of the current pens were shown, along with the proposed elevations of the replacement pens. These drawings also included the design of the proposed top nets, the

manufacturer's mooring specifications, and the design of the pen nets, which had a depth of approximately 35 metres. The existing feed barge would be relocated to a more central position between the two pen groupings.

The Officer summarised the policy considerations, stating that the proposal met the requirements of Local Development Plan 2 and the National Planning Framework 4 for aquaculture development. The proposal was assessed as having negligible landscape and visual impacts. No environmental impacts were identified, including no impacts relating to pollution or interactions with wild migratory salmon. The biomass would remain at 2,500 tonnes, and the use of fewer, larger pens would result in improved containment, fish health, water flow, and sea-lice management due to reduced stocking density. There were no concerns relating to amenity, as the equipment had been designed to minimise lighting and noise, and appropriate operational measures were in place, including a waste-management plan. No navigational or shipping impacts had been identified, and biodiversity enhancement measures were secured by planning conditions.

The Officer noted that the application had not attracted objections from any statutory consultee, including NatureScot, SEPA, the Marine Directorate, the Argyll District Salmon Fishery Board, Historic Environment Scotland, the Northern Lighthouse Board, the Royal Yachting Association, or internal Council consultees.

At the time of the December committee meeting, 11 objections had been received. These concerns related to impacts on local fishermen and their families, concerns regarding the ability to influence planning decisions, and suggestions that alternative sites were more suitable. The Clyde Fishermen's Association had submitted one objection in November 2024, followed by two further objections in December 2025. Their objections emphasised the importance of safe, productive fishing grounds and stated that fishing was not simply a matter of available area but of specific grounds essential to livelihoods. The CFA also provided landing and turnover information for the sector, together with links to national datasets. An objection had also been received from Councillor MacPherson, restating the CFA's concerns.

Since the December meeting, two further objections had been received: one from a local fisherman concerned that the proposed relocation lay within tows used in poor weather, and one from Whitby Seafoods, who stated that the proposal would affect supplies to their business, although they submitted no further evidence. Two comments had been submitted: one from a local creel fisherman who stated that no vessels routinely operated in the area in question and that he foresaw no conflict, and another from AquaSky, a marine inspection and surveying service, who stated that trawling at depths shallower than 100 metres risked equipment damage, that scallop dredging on the predominantly muddy seabed would be uneconomical, and that the proposed extension did not extend beyond the 80-metre contour, meaning it was unlikely to affect any mobile-gear activity. Two letters of support had been received, including from Salmon Scotland, who highlighted the benefits to the local community and supply chain, and from East Kintyre Community Council, who described the applicant as an important local employer and welcomed continued investment. In total, the application had received 13 objections, 2 comments, and 2 letters of support.

Turning to the commercial fisheries impacts, the Officer stated that this remained the central outstanding issue during the December deliberations. She explained that the applicant had engaged proactively with the CFA since pre-application stage, had commissioned a detailed technical moorings analysis, and had reduced the mooring extent by 14%, submitting amended plans. The applicant had also commissioned the

Poseidon Commercial Fisheries Report (October 2025). This report found that, based on AIS data over a five-year period, only 1.4% of vessel positions fell within the proposed planning boundary and 0.3% within the proposed mooring boundary. The report considered the proposed boundary to be the effective westward limit of bottom trawling on this side of the Sound and concluded that no significant impact on trawling or small scallop dredging was expected. The report acknowledged that navigation margins would be narrower but stated that any displacement would be minor compared with existing conditions.

Mitigation included enhanced navigational markers, sharing of coordinates, and the inclusion of Condition 18, which would ensure ongoing liaison and, if required, the preparation of a fisheries-management and mitigation strategy. Updated AIS data submitted after December showed vessel tracks for December 2025 to March 2026. Several vessels were identified in the vicinity, including the Atlas, Radiant Morn, Jenska, and Rebecca Jane, though no recorded tracks passed within the proposed mooring boundary. The closest track was 60 metres from the mooring boundary, and the vessel was travelling at 4.6 knots, unlikely to be fishing. The closest track thought indicative of fishing, recorded at 2 knots, remained 140 metres east of the moorings, within the deeper channel.

In response to CFA concerns about the Poseidon report, the applicant commissioned an updated commercial fisheries report in February 2026, which clarified data sources and confirmed that the vessels referenced by the CFA were included in the analysis. The updated report examined the CFA's "farm analogy" and identified around 0.8 square kilometres of seabed theoretically excluded by the mooring extent; however, this did not account for reductions on the northeastern and southeastern corners. The key issue examined was whether the proposed change would result in an actual loss of fishing opportunity, and the analysis concluded that dependency on the area was very low. Of the 1,034 AIS positions recorded in this segment of the Sound over five years, only 14 fell within the extended boundary, and most of these were located in an area that would not be affected by the proposal. The majority of activity occurred farther east, in the deeper trawling channel.

The Officer noted that the applicant had also undertaken additional engagement with vessels under 12 metres, which are not included in AIS datasets. Annotated images of small-vessel activity were included in Supplementary Report No. 2. The applicant had also stated their willingness to work with creeling and potting vessels to allow and mark safe access and creel deployment near the site, with these measures secured by planning condition.

The Officer then outlined the relevant policy considerations. Under LDP2 Policy 28, aquaculture development should not have significant adverse effects on commercial fishing activity, and should be assessed against net economic impact and community benefits. In this instance, salmon farming contributed positively to the national and local economy, provided employment, and supported investment. Operational measures to reduce or mitigate impacts had been secured.

The National Planning Framework supported aquaculture development where proposals complied with the LDP and National Marine Plan. The National Marine Plan required that existing fishing opportunities be safeguarded where possible and that mechanisms be in place for managing conflicts between fishing and other marine sectors. Policies Fisheries 2 and 3 required consideration of cultural and economic importance and, where necessary, the preparation of mitigation strategies. The Officer noted that these strategies

were generally associated with major marine developments but could be applied proportionately in this context. In this case, officers did not consider that significant adverse effects had been demonstrated. Liaison provisions and mitigation were secured via revised Condition 18.

In summarising commercial fisheries impacts, the Officer stated that, based on all information provided, officers were satisfied that the applicant had taken all reasonable steps to safeguard existing fishing opportunities, including through engagement with fishermen, design amendments, technical analysis, further data submission, and the agreement of Condition 18. Officers considered this to be a reasonable resolution and in accordance with NPF4 Policy 32, LDP2 Policy 28, and the relevant provisions of the National Marine Plan.

In concluding, the Officer stated that the Carradale North site was an existing operational fish farm, and the proposal represented a minor eastward relocation of 79 metres to the site centre and 150 metres to the mooring boundary. The proposal formed part of a broader modernisation programme that would deliver improvements in fish health, operational efficiency, and worker safety, supporting a key local employer with local, regional, and national economic significance. No statutory consultees had raised concerns. Commercial fisheries issues had been fully assessed, the proposal had been redesigned to minimise impacts, further engagement had taken place, and ongoing liaison and mitigation measures had been secured by planning condition. The local Community Council supported the modernisation as part of wider harbour investment and community benefit.

The Officer stated that the proposal was consistent with the relevant provisions of the Development Plan and that no material considerations indicated that permission should be withheld under Section 25 of the Act. She therefore commended the application to members for approval, subject to the conditions and reasons set out in the Report of Handling dated 1 December 2025 and revised Condition 18 in Supplementary Report No. 2 dated 26 March 2026.

## **APPLICANT**

Mr Stephen MacIntyre, Head of Environment for Mowi Scotland

Mr MacIntyre delivered a presentation to the meeting. He was accompanied by Rebecca Weeks, Senior Environmental Analyst; Cameron Jones, Regional Seawater Manager for Argyll; and Mark Laird, Local Manager in Carradale.

Mr MacIntyre re-introduced the presentation for the benefit of a new attendee and asked for the first slide to be shown. He explained that the introductory slide set out information on the salmon farming sector and Mowi Scotland's national footprint. He highlighted that Scottish salmon remained the UK's top food export, with the sector's economic contribution to Scotland having increased by 25% in recent years. He advised that the sector's economic contribution from Argyll in 2025 was approximately £100 million.

Mr MacIntyre described the distribution of the company's sites across Scotland and noted overall employment figures. He stated that Mowi was the largest operator in Scotland and that its activities played a key role in the economic success of the sector locally, regionally, and nationally. Many farms were located in rural coastal communities, and the next slide focused specifically on Argyll. He outlined the spread of operations in Argyll: in the north, Loch Etive and Loch Awe; in Mid Argyll, the Craobh Haven sites and the

open-sea site at Colonsay; and in Kintyre, three sites—North Kilbrannan and two fish farms at Carradale, which were the subject of the current proceedings. Mr MacIntyre emphasised that the company's operations provided stability and employment opportunities in fragile coastal communities, supporting local investment and resilience. He cited the partnership between the Carradale fish farms and the local community as a positive example.

As part of the application process, he reported that Mowi had regularly engaged with the East Kintyre Community Council. This engagement included attendance at community council meetings to explain proposals, provision of regular written updates, and participation in the annual village open day, which had been well attended by more than 100 people. Boards, images, and information on the plans had been presented, ensuring regular and wide communication over the two-year period.

Mr MacIntyre noted the challenge of depopulation in coastal communities and outlined the company's investment in career pathways for young people. He advised that Mowi was working with Campbeltown Grammar School, Salmon Scotland, and other partners to offer a vocational qualification—the National Progression Award in Aquaculture—as a senior subject option later in the year. He added that employment in the sector was regarded as desirable, shown by the 60 applications received for two recently advertised apprenticeships based in Carradale. He noted that aquaculture offered more than 80 different career paths for young people.

Moving to the next slide, Mr MacIntyre explained that it addressed frequent criticism regarding governance of the sector in areas such as fish health and mortality. He stated that the sector operated within a robust, multi-agency regulatory framework covering environmental protection, fish health, and planning. In addition, Mowi voluntarily adhered to a range of third-party standards. He highlighted that sites could be inspected 15 to 20 times annually by various authorities, demonstrating the high level of oversight and the focus on sustainable development.

In concluding his introduction, Mr MacIntyre stated that the proposed changes to the Carradale North Fish Farm were intended to modernise the site, future-proof operations, remain competitive, and ensure the production of healthy salmon. He noted that the company had modernised several farms in this way in recent years and emphasised the need to innovate and adopt new technology as it became available.

#### Rebecca Weeks, Senior Environmental Analyst

Ms Rebecca Weeks provided an overview of operations at Carradale North to date, the proposed changes to the site, the benefits of transitioning to fewer and larger pens, and the stakeholder engagement undertaken over the preceding two and a half years since the application had been submitted.

Ms Weeks noted that Carradale North had been operational since 2015. She confirmed that a team of 20 employees operated from the Carradale shore base, covering both Carradale sites, North Kilbrannan, and the site service vessel. Eighteen of the employees lived locally, and two travelled from Glasgow.

She explained that the company was proposing to reduce the stocking density at the site from 15.6 to 12.78 kilograms per cubic metre, representing fewer fish per cubic metre and providing associated fish-health and welfare benefits. The maximum biomass would remain unchanged at 2,500 tonnes, and any future change to that figure would require a

separate application process. She advised that since 2011, when this type of record began, the company had harvested just over 10.5 million salmon from the combined Carradale sites, equivalent to more than 100 million meals supplied to national and international markets. Ms Weeks reiterated that the purpose of the application was to modernise the site, remain current and competitive, and secure local employment into the future.

Ms Weeks confirmed that the company maintained a regular communication plan with the East Kintyre Community Council. She outlined a suite of parallel developments, including a £2 million land-based improvement plan to modernise the harbour and shore base, positioning Carradale as an established regional base. The proposed seawater development under consideration represented a further £3 million investment. She added that the company remained committed to contributing to the Community Development Fund and supporting the Carradale Affordable Housing Project. The East Kintyre Community Council had acknowledged the socioeconomic benefits of the company's presence within the community.

Ms Weeks summarised the Planning Officers' report, noting that commercial fishing had been the only issue raised during the application process. Planning Officers had concluded that no matters had been identified that would justify refusing planning permission. This conclusion had been supported by extensive consultation with statutory consultees including SEPA, NatureScot, and Marine Directorate, and the final recommendation was that planning permission should be approved, subject to the pre-determination hearing and appropriate conditions.

Turning to the proposed changes, Ms Weeks explained that the original layout submitted during the screening stage—classified as a non-EIA application—had been revised following feedback from the Clyde Fishermen's Association. The proposal now involved upgrading to fewer, larger pens, allowing for modern equipment and improvements in operational efficiency and fish health.

In light of the feedback, the company conducted an internal review of available marine traffic data. Ms Weeks described vessel-tracking information showing all traffic in the area, including company vessels and recreational craft. Data indicated a higher number of boats entering and leaving Carradale Harbour, prompting amendments to the mooring layout to ensure the safe transit of vessels. She noted that most vessel tracks were high-speed, suggesting transiting rather than active fishing activity. She highlighted that the easternmost moorings reached depths of around 80 metres, with the 100-metre contour lying slightly further east, which would be relevant to later considerations.

Ms Weeks reported that, following a re-analysis by the moorings provider, the company had been able to reduce the mooring spread by 14% compared with the initial design. This reduction required investment in higher-specification and more costly mooring systems. She explained that the layout could not be moved further inshore due to the increased depth required for the larger pens, and the company had also chosen not to move further north to avoid potential conflict with local creel fishermen, with whom they had held discussions.

#### Cameron Jones, Regional Seawater Manager, Mowi Scotland

Mr Jones provided an overview of the equipment currently used by Mowi Scotland. He explained that the company operated a mixture of steel square pens, measuring either 24 x 24 metres or 36 x 36 metres, although the more commonly used structures were plastic

circular pens ranging from 100 to 200 metres in diameter. At Carradale North, the company was operating with ten 120-metre pens.

He noted that managing a high number of pens required substantial maintenance, labour, and resources, which made day-to-day farm operations more demanding. Mr Jones went on to explain the rationale behind the proposed move to 160-metre pens. He stated that Mowi was still a relatively young company at around 60 years old and continued to innovate, learn, and grow quickly. He described how pen sizes had evolved over time—from 24-metre steel structures to 200-metre pens at some locations. Recent experience across twelve sites that had already adopted 160-metre pens indicated that these larger pens performed better in adverse weather conditions. They ride waves more effectively due to their increased surface area, which improved staff safety, containment security, and fish welfare. He added that operating fewer, larger pens increased efficiency in daily farm operations. This included routine tasks undertaken by the site team as well as freshwater bathing treatments, which could be completed more quickly on farms with fewer pens. Faster treatment processes reduced the risk of re-infestation from sea lice or recurrence of gill-related issues such as Amoebic Gill Disease (AGD). Mr Jones noted that these benefits aligned with the successful rollout of 160-metre pens across the 12 existing farms where they had been installed, with further sites planned. Mowi Scotland currently operated 48 farms in total.

Mr Jones highlighted additional benefits, including improved sea-lice management due to the distribution of fish across fewer but larger pens. He remarked that Carradale historically experienced very low lice levels, and sea lice were naturally occurring parasites. He emphasised that lower stocking densities—achieved by consolidating stock into fewer, larger pens—supported best practice for fish health and welfare. Reduced stocking density also lessened waste-deposition footprints on the seabed, helping minimise environmental impacts. Finally, he noted that upgrading Carradale to larger pens would also allow the company to reallocate existing steel pens to other sites still using older infrastructure, helping to modernise farms across the wider business.

#### Rebecca Weeks, Senior Environmental Analyst, Mowi Scotland

Ms Weeks provided an overview of the stakeholder engagement undertaken since the submission of the application in July 2024. She noted that, as previously outlined, several statutory consultees had been consulted during the application process, and none had raised objections. As a result, most of the stakeholder engagement had focused on the wild fisheries sector, particularly in response to a sustained objection from the Clyde Fishermen's Association (CFA). She explained that the company had been keen to engage proactively with the CFA, drawing on lessons from other local proposals, and had approached them before any objection was submitted.

Ms Weeks confirmed that engagement with the CFA had taken place on multiple occasions through both formal and informal channels. Formal engagement included Microsoft Teams meetings, email correspondence, and phone discussions with the Executive Secretary and individual members. She described these interactions as useful and collaborative, enabling the company to amend its plans and reduce the moorings area by 14%. Both parties had exchanged information, including a chart-plotter image from the CFA, which the company geo-rectified to overlay within its mapping software to assess interactions with the proposed site. This analysis highlighted an area of poor fishing ground that aligned with rocky seabed features and the suggested mooring extent. The company had reciprocated by sharing mooring-extent information with creel fishermen to assist them in fishing as near as possible to existing pens, and committed to

sharing updated information once available. However, Ms Weeks noted that some information received from the CFA had been unclear or contradictory. For example, supplementary report one included an email dated 10 December 2025 indicating that the vessels most affected would be mobile-gear boats. She noted that these vessels were all legally tracked and therefore already represented in the marine-traffic data analysis. In contrast, separate engagement with local creel fishermen suggested that claims of creeling activity on the inshore side of the site were not accurate.

Ms Weeks acknowledged the national hesitancy among commercial fishermen to share confidential fishing data, given competitive sensitivities. To support improved communication, Salmon Scotland had established a liaison group to streamline dialogue between the aquaculture industry and fisheries associations, with the intention of informing future applications involving potential spatial conflicts between aquaculture and wild fisheries. Despite engagement efforts, Ms Weeks explained that several individual objections had been submitted. Most followed a standard template and lacked supporting evidence that might have enabled further amendments to the proposal. However, four vessel names had been supplied: MFB Atlas, MFB Regent Mourne, MFB Rebecca Jane, and Janice. She reassured members that all four vessels—three of which were 16 metres in length and one 22 metres—had been included in the Poseidon fisheries report.

To expand upon the company's in-house marine-traffic analysis, Ms Weeks reported that an independent fisheries consultant had been commissioned. She summarised key findings, noting that AIS data provided positional information transmitted every five minutes, which all vessels over 12 metres were legally required to broadcast while operating. Over a five-year dataset, only four AIS data points fell within the proposed mooring boundary—representing just 0.3% of all recorded locations. A heat map demonstrated that the majority of mobile-gear fishing activity occurred in the deeper central channel. She highlighted that the area beneath the proposed moorings corresponded with rocky outcrops shown in dark green on the map. Fishing patterns suggested that rocky areas were typically avoided, leading to the assumption that similar avoidance would apply beneath the proposed moorings. Responding to earlier representations, she clarified that the company was not proposing the relocation of fishing activity eastwards but was noting that the small number of recorded data points could be safely absorbed within existing, already-used deep-channel fishing grounds.

Ms Weeks further advised that these conclusions were supported by the company's moorings inspector from Aqua-Skye, an ex-fisherman with experience in prawn trawling and scallop dredging. In a written representation, he had confirmed that the seabed shallower than the 100-metre contour was unsuitable for trawling or dredging. The proposed extension remained within the 80-metre contour, and therefore, in his professional view, would not impact mobile bottom-trawling activities. She added that although the CFA had asserted the proposal posed a significant issue for mobile-gear operators, this was not supported by the data.

Addressing an analogy previously raised by the CFA—comparing the proposal to excluding a farmer from productive land in favour of an unproductive area—Ms Weeks stated that while such an analogy might suit a new-site development, it was not applicable in this case. She emphasised that Carradale North was an existing site and that the proposal involved only a small extension. Productive grounds lay immediately east of the site, and only 1.35% of all mobile-gear fishing recorded over five years had occurred within the proposed mooring area, all of which related to the southern site rather than the northern proposal under discussion.

Recognising the limitations of AIS data in capturing vessels under 12 metres, Ms Weeks referred to concerns raised at the December planning meeting. She then presented maps showing the fishing grounds of five local prawn-creel vessels under 12 metres in length, which the company had engaged with directly. The maps demonstrated that prawn-creel activity centred on the deeper channel and muddy areas to the north and south of both the existing and proposed cages. She confirmed that all three primary prawn-creel vessels based in Carradale were represented in the mapping, with full details provided in Supplementary Report 2, Section 4, and Appendix B.

Mark Laird, Carradale Site Manager, Mowi Scotland

Mr Laird addressed the meeting and confirmed that, as indicated by Ms Weeks, he had engaged directly with the local creel fishermen operating from Carradale Harbour. He explained that through regular conversations with them, he had identified and recorded the areas in which they fished. He noted that none of these fishermen appeared among those listed in the objections submitted by the Clyde Fishermen's Association, and all had expressed that they had no objections to the proposal. He reported that the creelers were content to continue working alongside the company, as they had done routinely.

Mr Laird advised that although the fishermen were not willing to formally document their fishing grounds on paper for presentation, they had provided the necessary information verbally. He added that this was supported by the company's own operational logs gathered on site. While he had only been based at Carradale for a couple of years, he noted that staff with over 15 years of experience had confirmed that creeling activity did not take place within the areas shown on the maps presented to the meeting. The company had also not observed fishing within those grounds.

In closing, Mr Laird reiterated a point raised earlier by Mr Cameron, confirming that the proposed £3 million investment in new pens was for the benefit of the fish—specifically to improve fish health and welfare—and **not** to increase stock numbers.

Rebecca Weeks, Senior Environmental Analyst, Mowi Scotland

Ms Weeks stated that Mowi remained highly conscious of the need to avoid competition for marine space and acknowledged the increasing pressures on the fishing industry arising from spatial squeeze. She recognised the importance of Kilbrannan Sound for a range of commercially valuable fishing species, as well as its wider role within the Firth of Clyde.

She explained that the proposal before the committee represented only a slight expansion of the existing site, over an area that had been described in a chart-plotter image provided by the fishing sector as poor-quality fishing ground. She reported that this position was supported by all publicly available data, Mowi's engagement with local fishermen, and on-site observations. She noted that the independent fisheries report, Mowi's own investigations, and the Planning Officer's report were all aligned in their conclusions that the proposal would not give rise to significant adverse effects on fisheries.

Nonetheless, Ms Weeks emphasised that the company wished to maintain harmonious coexistence with fisheries interests. She confirmed that Mowi intended to engage fully with draft Condition 18, which proposed the establishment of a forum with Clyde Fishermen's Association members. If considered necessary by any party, Mowi would also participate in the preparation of a Fisheries Management and Mitigation Strategy, although she noted that such strategies were typically associated with much larger developments, such as offshore wind projects.

Turning to the final slide, Ms Weeks outlined the benefits of the proposed changes. She explained that the upgrades would modernise and future-proof the Carradale North Fish Farm, safeguarding employment and supporting ongoing community benefits. While the application related to investment in the marine elements of the operation, she highlighted that it sat alongside a significant programme of planned harbour-side improvements. These included infrastructure enhancements that Mowi considered both necessary and desirable. She noted that the community and the council had ambitions to revitalise the harbour, which had deteriorated over time, and Mowi wished to support this aspiration. She confirmed that the harbour-side improvements would proceed regardless of the outcome of the present application.

Ms Weeks acknowledged that the application had prompted important considerations in relation to marine spatial planning. She stated that Mowi understood, acknowledged, and sympathised with the concerns expressed by the commercial fishing sector. However, she emphasised that the proposal represented only a minor alteration to the operational footprint of a long-established fish farm. Based on all available evidence—including official vessel-tracking data, observational data from farm staff who worked 12-hour day and night shifts, the characteristics of local seabed substrate, and direct engagement with local vessel owners—Ms Weeks stated that Mowi genuinely believed the proposal would **not** result in the loss of recognised fishing grounds.

## **CONSULTEES**

### Elaine Whyte, Clyde Fisherman's Association

Ms Whyte addressed the meeting on behalf of the Clyde Fishermen's Association (CFA) and highlighted a number of policy concerns. She stated that the Association had identified conflicts with five policies in the National Marine Plan—GEN 4, GEN 12, GEN 11, GEN 8, and GEN 9—as well as a point within the Argyll and Bute Local Development Plan 2. She noted that, contrary to earlier statements, the Poseidon report had suggested that displaced fishing activity could be absorbed to the east of the site. She explained, however, that this was not feasible due to the presence of rock dumping and subsea cables in that area, which were publicly charted in Kingfisher and other navigational resources following recent re-cabling work.

Referring to comments made about Aqua-Sky, she clarified that although the company acted as Mowi's moorings manager, the CFA was not aware of their direct experience of fishing in the area. She emphasised that local fishermen present at the meeting did not agree with Aqua-Sky's assessment of the seabed. She also noted that several local creel fishermen had submitted objections, contrary to earlier references suggesting broad support. She reported that 11 or 12 fishermen had objected, in addition to the CFA, and stressed that these fishermen should be allowed to speak for themselves.

Ms Whyte confirmed that the CFA had written to the East Kintyre Community Council on 20 March to ensure the Council were aware that many local fishermen did not support the proposal. She emphasised that the Association did not consider the proposal to be a "minor change." To illustrate this, she asked the meeting to consider whether Mowi would regard a reduction in its pen numbers as a minor modification if it were proposed by the fishing sector. She explained that the CFA viewed the development as displacing fishing activity.

Addressing the reliance on AIS data, Ms Whyte repeated that AIS did not capture vessels under 12 metres, which constituted the majority of the inshore fleet. She also noted that even some of the larger vessels, which had been referenced by Mowi, were not consistently represented because vessel activity was seasonal. She added that several skippers who normally fished the area regularly had been unwell in recent months and therefore had not appeared in the dataset. In her view, this further limited the reliability of the AIS evidence. Ms Whyte stated that mitigation measures proposed for discussion after approval would be ineffective, as planning consent itself would result in the permanent loss of fishing grounds. She argued that, at present, wild-fishing activity was able to operate in cooperation with the existing site, and that the requirement in Section 6 of the National Marine Plan to protect wild fishing “wherever possible” had not been met. She stressed that the CFA supported aquaculture in principle but considered this development to threaten an important fishing ground in terms of both productivity and safety.

She expressed concern over the consultation process, noting that the CFA had received the Poseidon report at short notice and had only a few working days to review it. She stated that the chance to speak directly with the authors would have allowed fishermen to highlight errors or omissions. She also referenced the CFA’s role in training young fishermen, noting their recent national awards and the sector’s strong contribution to local communities.

Ms Whyte stated that much of the discussion had focussed on statutory consultees, yet these bodies did not oppose the work currently undertaken by licensed fishermen either. She pointed out that CFA members had historically built Carradale Harbour and that it was important to recognise fishermen’s cultural and economic contribution to the area. She urged the committee not to undervalue the heritage of fishing in Argyll and Bute, noting its significance from authors such as Naomi Mitchison through to modern tourism, with visitors wishing to see active working harbours.

Turning to policy matters, Ms Whyte stated that the decision should not be based on whether some fishing might still take place after development, but on whether the proposal protected the long-term viability of an established local industry. She remarked that evidence did not demonstrate this. She highlighted that the west coast already supported 109 finfish-farm sites and that the rate of approvals in Argyll and Bute had been particularly high. She explained that spatial conflict between aquaculture and fisheries was a growing national concern, citing recent refusals of aquaculture applications in the Western Isles and similar issues arising in Highland Council areas.

She added that the last five years of AIS data were distorted due to the impacts of COVID-19 and Brexit, both of which had reduced fishing activity. This, she argued, led to an underrepresentation of true fishing effort. She emphasised that the wild-fishing supply chain—although fragmented—comprised individual family businesses, hauliers, processors and exporters, and should be considered as a combined socioeconomic system.

Addressing cumulative spatial squeeze, she noted that pressures came not only from aquaculture but also from MPAs, subsea cables, rock-dumping, naval closures and other marine uses. She referred to recent work by the National Federation of Fishermen’s Organisations and the Scottish Fishermen’s Federation, which demonstrated significant national losses of fishing space.

Ms Whyte went on to outline detailed policy conflicts with the National Marine Plan, Scotland’s National Planning Framework 4 (NPF4), and the Argyll and Bute Local

Development Plan. She stated that the proposal conflicted with requirements to support coexistence, safeguard fishing opportunities, and avoid displacement. She criticised the Poseidon report for failing to apply the precautionary principle despite acknowledged data gaps, particularly for vessels under 12 metres. She argued that the methodology used—relying on percentages of space fished—ignored the functional value of specific grounds, including seasonal refuge, safety considerations, and high-value capture zones.

She stated that the assumption that displaced fishing could be absorbed elsewhere was unsupported and contrary to policy. She also argued that no cumulative-impact assessment had been provided, despite this being a requirement of GEN 4 and GEN 12 of the National Marine Plan.

She emphasised that fishing activity, especially for small vessels, must be understood through lived experience. She expressed concern that anecdotal ecological benefits said to arise from aquaculture pens had not been evidenced.

Ms Whyte stated that impacts had been too narrowly defined as overlaps in AIS tracks, excluding wider factors such as safety zones, gear conflict, weather refuge, operational flexibility, and cultural significance. She explained that fisheries impacts were not merely financial: they affected vessel viability, crew livelihoods and the resilience of local supply chains.

She argued that the Poseidon report was not fit for decision-making due to data gaps, assumptions about the under-12-metre fleet, and failure to capture socioeconomic impacts required by policy. She reiterated that displacement was not a minor inconvenience but caused real economic harm, increased fuel use, greater emissions, risk of gear conflict and heightened safety risks. She noted that such impacts could accumulate regionally and force exits from the industry.

She stressed the importance of safety, recalling a previous incident in which a CFA member had snagged an anchor in an area they believed should have been clear, causing a serious risk to life. She noted that the grounds affected by the proposal were productive and, crucially, offered safe working conditions across a range of weather states. Loss of these areas would require vessels to operate in more hazardous ground.

On economic considerations, Ms Whyte noted that while aquaculture provided some local jobs, the fishing sector was deeply embedded in the community, with crews living and spending locally. She urged the committee to consider the precautionary principle where socioeconomic uncertainty existed. She stressed the importance of food security and highlighted that local scallops and langoustine were of exceptionally high quality and in demand. She added that local seafood had played a vital role during COVID-19 when direct sales supported communities.

She also stressed environmental considerations, noting that displacement would increase steaming distances, fuel use and conflict with Scotland's net-zero ambitions.

On intergenerational issues, she described the CFA's work in training young fishermen, which was helping to reverse depopulation trends by creating viable local careers. She cautioned that incremental approvals would set a precedent for continued encroachment into fishing grounds.

Ms Whyte concluded by urging the committee to recognise the cumulative displacement of fishermen, the cultural importance of local fishing, and the need for robust and

precautionary planning. She highlighted that the proposal would narrow fishing areas, increase safety risks, and diminish economic resilience, and that these impacts were not adequately reflected in the evidence presented.

### Kenny McNab, Chair of Clyde Fisherman's Association

Mr McNab addressed the meeting and confirmed that he did not have a formal presentation, relying instead on his 55 years of fishing experience. He stated that he strongly disputed several elements of the Poseidon report. He expressed disbelief that a consultancy would produce such a report without first speaking to local fishermen with direct knowledge of the waters in question, describing this as a significant failure in their approach.

He referred to comments made earlier regarding an assessment by a fishing expert who had concluded that the seabed adjacent to the fish farm was unsuitable for towing gear. Mr McNab stated that he completely rejected this conclusion. He explained that historic fishing-track data—from before the fish farm was established—would clearly demonstrate that fishermen had towed gear in that area. He emphasised that Mowi's decision to examine only the most recent five years had overlooked this evidence. He confirmed that historic positional data could be provided to support the fishermen's position.

Mr McNab went on to outline the pressures faced by the fishing industry over the last 15 years, highlighting the cumulative spatial squeeze affecting fishers. He stated that the Firth of Clyde currently contained 18 fish farms, which he believed was already at maximum capacity. Beyond aquaculture, he noted that fishing grounds had been substantially reduced through other restrictions and designations.

He described the severe reduction in the Clyde fleet, explaining that in 2013 there had been 67 vessels over 15 metres, compared with only 15 vessels remaining at present. Scallop dredgers had reduced from 23 vessels to 4, and two-thirds of the under-15-metre fleet had also been lost. He emphasised that this decline was not due to poor fishing performance. He noted that Nephrops—one of the area's key species—had been Scotland's second-most valuable wild catch the previous year at £87 million, an increase of 46% since 2015. In his view, these figures demonstrated that fishing productivity remained strong and that the decline of the fleet was caused by the loss of fishing grounds, not by declining stocks.

Mr McNab stated that the Clyde fishing area encompassed approximately 3,600 square kilometres, but that about 1,150 square kilometres—roughly one-third—had been lost due to marine protected areas, naval closures, subsea cables, rock-dumping and fish-farm expansion. He argued that although the proposed extension appeared small, it lay within high-value, highly productive prawn-fishing ground, where only limited areas supported viable catches. He explained that even if only six vessels used the area, each of these could gross between £400,000 and £500,000 per year, representing significant income that flowed directly into local communities. He emphasised that this money stayed within the region and supported local businesses.

Speaking on community matters, Mr McNab stated that he was born and raised locally, as were five generations of his family who had also fished in the area. He said he had always been committed to supporting the community and had long represented fishermen through the Clyde Fishermen's Association. He expressed frustration when discussions overlooked the role that fishermen had historically played in establishing and sustaining communities such as Carradale and Tarbert. He stated that fishermen were the "creators

of community,” not people who were “buying community” in modern times. He expressed concern about the gradual loss of fishing heritage and culture.

Mr McNab stated that he considered the proposed extension not worth the loss it would impose on the fishing sector. He reiterated that the development did not increase the site’s biomass and therefore did not justify the displacement and economic harm that fishermen would face. In his view, the cost to local fishing and the wider community far outweighed any benefit the proposal might bring.

## **SUPPORTERS**

No supporters attended the meeting.

## **OBJECTORS**

### Emma Kearns, Whitby Seafoods

Ms Kearns addressed the meeting on behalf of Whitby Seafoods, explaining that the company was the largest scampi producer in the world and was therefore heavily dependent on the UK nephrops fishery across the British Isles. She emphasised that the fishing fleet was already under significant pressure due to displacement and increasing spatial squeeze on fishing grounds.

She stated that the proposed extension of the aquaculture site had the potential to further impact the supply of seafood to her business by affecting the operations of vessels belonging to members of the Clyde Fishermen’s Association. She highlighted that any additional constraints placed on CFA vessels could, in turn, affect the availability of nephrops supplied to Whitby Seafoods.

## **MEMBERS’ QUESTIONS**

Councillor Paul Kennedy sought clarification on whether the original planning applications for the site had attracted any objections from the local community. He noted that, although the current proposal involved only a small displacement, it appeared to have prompted a significant level of objection at this stage.

He commented that the objections seemed substantial given that the purpose of the proposal was to modernise operations in line with new technologies and evolving understanding of fisheries management. He expressed the view that the opposition felt unexpectedly negative in the context of a development intended to improve and update existing facilities, but stated that this was his personal opinion.

Mr McNab stated that, to the best of his recollection, the Clyde Fishermen’s Association had submitted an objection to the fish-farm proposal when it was originally brought forward in 2007.

Councillor Paul Kennedy asked a further question whether Mowi had installed similar larger pens at other locations in Scotland, noting that he had understood the number to be around twenty sites. He further asked whether any objections had been received from

local communities in those areas regarding the slight relocation and enlargement of pens associated with such installations.

Mr MacIntyre stated that he did not recall any other applications having required consideration by a committee. He advised that, as far as he was aware, all similar applications had previously been determined under delegated powers.

Councillor Paul Kennedy asked that, as this appeared to be the first application of its type to be brought before a committee, and with further similar proposals anticipated in the pipeline, the decision under consideration was of significant importance to the applicant.

Mr MacIntyre stated that Mowi had an ongoing programme of improving infrastructure across its sites in order to secure the benefits outlined within the application. He noted that other sites which had already upgraded to the proposed system had seen improvements in fish-mortality levels. Based on the performance at those locations, he advised that Mowi would anticipate a 5% improvement in mortality rates at Carradale, which would equate to approximately 150,000 additional fish surviving through to harvest.

Councillor Green asked a question directed to the Clyde Fishermen's Association. He referred to an earlier statement in which the CFA had mentioned the total number of fish farms operating within the Clyde area. He requested that this figure be repeated for clarity and advised that he had a supplementary question to follow.

Mr McNab advised that there were 18 fish farms in the Clyde Area.

Councillor Green asked how many of these fish farm planning applications had the CFA objected to. Mr McNab responded that not all fish-farm applications had been opposed by the Clyde Fishermen's Association. He explained that, in relation to the original fish farms in Loch Fyne, the CFA had met with the operating companies before any applications were submitted. At that time, the companies had included Landcatch, later Lighthouse, and subsequently the Scottish Salmon Company. He stated that on those occasions the CFA had agreed to give up valuable fishing grounds, but only where the farms could be located in positions that allowed fishermen to continue working safely around them. He added that discussions of this nature remained common practice and confirmed that the CFA was currently in negotiations with another fish-farm operator regarding a separate site, where an agreement had been reached. Mr McNab emphasised that the CFA did not routinely object to all fish-farm developments and wished to see aquaculture succeed, recognising that the sector provided employment. However, he reiterated that fishermen were unwilling to lose further small but highly valuable areas of fishing ground. He noted that the original Carradale site had been located where it was following discussion with the company at the time, but the current proposal sought to alter that agreed position. He concluded by stressing that the CFA did not object to every fish-farm application, but wished to ensure that irreplaceable fishing grounds were not eroded.

Councillor Paul Kennedy asked a question regarding the economic viability of the proposed development. He noted that Mowi intended to produce the same volume of fish within the larger pens and therefore would likely generate a similar level of profit. He queried whether, given the significant investment required to install the new pens, there was a point at which operating at this site could become uneconomical. He asked whether the cost of the upgrades might ultimately outweigh the financial return and whether this was a factor under consideration.

Ms Weeks explained that the proposed upgrade formed part of a wider programme of modernisation across the company, which Mowi recognised as necessary to remain current and up to date. Mowi stated that the primary benefit of the investment would arise from increased fish survivability. Mowi noted that, following updated information received from the company's data analysts earlier that day, Mowi anticipated a 5% improvement in survivability at Carradale, equating to approximately 150,000 additional fish reaching harvest compared with current levels.

Councillor Paul Kennedy sought clarification on the economic implications of the proposal. He asked whether, as a result of the anticipated improvements in survivability, the site would remain economically viable in the long term. He queried whether Mowi would continue operating at Carradale as it currently did, or whether financial considerations could eventually affect the feasibility of maintaining the site.

Mr MacIntyre stated that the site would not become economically unviable. He explained that as pen and equipment technology continued to evolve, Mowi wished to take advantage of improved systems. He referred to a storm event at Carradale several years earlier, which had resulted in an escape incident. The new pens proposed for installation were significantly more robust, built to higher engineering standards, and fully compliant with the Scottish Technical Standard for aquaculture design. He emphasised that these enhancements would provide additional operational benefits, including reducing the likelihood of future escape incidents at sites exposed to high tidal flows and wave conditions.

Councillor Brown sought clarification regarding the updated mortality figures referenced earlier in the meeting. She noted that no specific figure had been provided during the morning session but that an updated figure had now been mentioned. She asked that the expected mortality rate for Carradale, based on the introduction of the new larger pens, be stated again for the record. Ms Weeks explained that Carradale already experienced a low mortality rate, and she described it as a well-performing site. She reported that the current production cycle was operating at a mortality rate of 2.7%, which she stated was very low. The highest mortality recorded at the site within the past five years occurred in 2023, when the rate reached 8.75%. She advised that, based on performance observed at other sites where the new pen technology had been installed, Mowi predicted an improvement in survivability of 5% at Carradale. She stated that this improvement would equate to approximately 150,000 additional fish surviving to harvest.

Councillor Brown observed that the expected increase in profit appeared to arise from improved fish survivability resulting from investment in larger, higher-quality equipment. She stated that while the upgrades were intended to benefit fish health and welfare, they also provided a financial benefit to the company, which she noted was an inherent part of its commercial purpose. She commented that enhancing the size and quality of equipment would deliver improvements across the board. Councillor Brown clarified that this had been the information she had sought earlier in the meeting. She expressed appreciation for the response that had now been provided and stated that she was not opposed to the proposal but had wished to obtain a clearer understanding of the financial implications.

Mr MacIntyre stated that the company had a duty of care to ensure the welfare of the animals it reared. He noted that while improved profitability was one outcome of the proposed upgrades, the primary consideration was the broader range of benefits associated with enhanced performance throughout the production cycle.

Councillor Brown reiterated her earlier remarks, stating that the company's commitment to animal welfare was commendable and that she had acknowledged this during the morning session. She noted, however, that while welfare was an important aspect, the company ultimately operated as a commercial entity and was therefore also focused on generating profit. She thanked the presenter for the clarification provided and confirmed her appreciation for the response.

## **SUMMING UP**

### **Planning**

#### **Sandra Davies, Major Applications Team Leader**

Ms. Davies of the Planning Department advised that members had been made aware of arguments both supporting and opposing the proposed replacement of the existing 10 × 120 m circumference pens and 6 × 160 m circumference pens at the marine fish farm site. She reported that members had also been informed of wider concerns relating to the management of shared marine space and the potential for conflict between sectors of the agriculture industry—in this case, salmon farming and local commercial fishing.

Ms. Davies noted that members had heard directly from the applicant, who stated that the proposal represented a significant investment in the locality. According to the applicant, the development would retain stable local employment, improve fish health, and enhance operational safety at the site. The proposal was also expected to continue supporting the wider local supply-chain economy, including expenditure within local businesses in Argyll and Bute.

She advised that although some local fishermen had objected to the development on the basis of potential loss of fishing grounds, there was limited empirical evidence to quantify this alleged loss. Evidence had also been provided indicating that the seabed adjacent to the site was unsuitable for trawling or dredging activity. For creeling and potting vessels, the applicant had agreed to facilitate safe access to the pens wherever possible, and a planning condition was proposed to secure effective ongoing liaison.

Ms. Davies highlighted that the Clyde Fishermen's Association had been critical of the applicant's Poseidon report; however, these criticisms appeared to be anecdotal and not supported by evidence. In contrast, East Kintyre Community Council and local fishermen had expressed support for the proposal, noting that it would not adversely affect fishing activities and recognising the applicant's investment in the area through its community fund, the new shore base, renovation of the pier house, and installation of a new harbour pontoon.

The hearing had provided members with an opportunity to seek clarification from consultees, third parties, and the applicant on matters relevant to determining the application.

Ms. Davies explained that the proposal concerned an existing operational fish farm and involved only a minor relocation of the site centre from the current mooring boundary to the proposed revised mooring boundary. The development formed part of a wider modernisation programme intended to deliver benefits in fish health, operational efficiency, and health and safety for site workers. She stated that the proposal supported a key local employer and contributed to local, regional, and national economic activity.

She confirmed that commercial fisheries impacts had been fully assessed. The proposal had been redesigned to minimise potential effects, and any remaining impacts would be addressed through mitigation secured by planning conditions. The Local Community Council supported the modernisation as part of the broader investment in Carradale Harbour, recognising the associated benefits for local jobs and the community.

In advising members on their decision-making responsibilities, Ms. Davies referred to Section 25 of the Town and Country Planning (Scotland) Act 1997, which requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise.

She outlined the relevant Development Plan policies, including NPF4 Policy 32 and Argyll and Bute LDP2 (2024) Policy 28, which set out the criteria for assessing aquaculture development. Despite the objections lodged by the Clyde Fishermen's Association and other third parties, officers were of the view that the proposal complied with all relevant policies.

She advised that the National Marine Plan was a material consideration in relation to commercial fisheries impacts. Officers considered that the matters raised had been appropriately addressed and that impacts had been mitigated to a level that would not justify refusal of planning permission.

Ms. Davies responded to comments from the Clyde Fishermen's Association regarding planning policy assessment. She stated that the Planning Service, as professionally qualified and chartered RTPI members, was confident that the policy assessment undertaken was robust, reasonable, and provided a sound basis for decision making. Officers also considered the Poseidon report to be an independent and professionally competent document that offered reliable evidence for consideration.

Ms. Davies therefore commended the proposal to members for approval, subject to the conditions and reasons set out in the Report of Handling dated 1 December 2025, and the revised Condition 18 contained in Appendix C of Supplementary Report 2 dated 26 March.

### **Applicant**

#### **Stephen MacIntyre, Head of Environment, Mowi Scotland**

Mr. MacIntyre summarised the reasons for seeking the proposed change and outlining the benefits anticipated for site operations. He stated that the proposal would future-proof the site by enabling the business to take advantage of developing technology, improve operational practices, and produce healthier fish. He emphasised that this would support the maintenance of local employment levels into the future.

He highlighted the company's employment within the Carradale area, noting that although reference had been made to concerns regarding staff numbers, the site employed 20 staff, 18 of whom were based in Argyll, along with their families. He advised that wages earned at Carradale were spent locally, contributing to the Argyll economy. He further reported that in 2024, the company spent £14.5 million with Argyll suppliers and service providers, demonstrating that revenue generated by its operations was reinvested within Argyll and Bute.

Mr. MacIntyre acknowledged that conflicting information had been presented during the hearing regarding fishing activity and productivity within the area covered by the proposed

extension. He recognised that this created challenges for members in reaching a decision. However, he referred to the evidence available to the applicant, which included:

- the independent professional report produced by Poseidon;
- direct engagement with current and former fishermen;
- fifteen years of seabed survey data and advice from a local surveyor confirming the unsuitable nature of the seabed substrate for fishing; and
- observational data recorded by the company's staff, who were on-site for most days of the year.

He stated that staff did not observe fishing activity within the extension area, although such activity was regularly seen elsewhere in the wider sound. He stressed that this lack of activity was consistent with the evidence on unsuitable seabed conditions.

In closing, Mr. MacIntyre stated that MOWI had sought to engage openly and transparently throughout the application process and welcomed the involvement of the Clyde Fishermen's Association, which he described as constructive. He confirmed that the MOWI wished to coexist harmoniously with other marine users and believed that this principle remained achievable through the proposed development.

He thanked members for their time and consideration.

## **Consultees**

### **Elaine Whyte, Clyde Fisherman's Association**

Ms Whyte noted that there had been two supporters of the proposal, while eleven local fishermen had submitted individual objections. She stated that these figures formed the factual basis of the discussion, emphasising that the majority of local fishermen opposed the proposal and had taken the time to write letters. She advised that she had also submitted a letter on behalf of the CFA.

Ms Whyte commented that it was not her intention to speak for others, nor did she believe that fishermen should have their views represented by anyone else. She highlighted that there was evidently a problem and stressed that the fishing sector was not trying to be difficult. She referred to Mr McNab's earlier remarks, agreeing that both sectors wished to see aquaculture develop appropriately, and that relationships had improved over time. However, she stated that each sector had "red lines".

She observed that fishing had been downgraded in the area, though she believed this did not need to be the case and that there remained potential for development. She reflected on visits to Norway, questioning whether a similar situation would occur there, and suggested that the value of fisheries was better understood in that context. She referred to investment funds and other opportunities emerging for the fishing sector and emphasised the desire to see it grow. However, she stressed that the industry could only be sustainable if it was allowed to survive.

Ms Whyte reminded the meeting that fishermen had given up ground in 2007 as a compromise and were now being asked to give up more, not only for this project but for several others. She stated that while coexistence was desirable, it should not result in growth in one sector at the expense of another. She highlighted that the fishing businesses at risk were small, family-owned, indigenous vessels already under significant pressure. She reported that some members with young families were considering leaving

Kintyre and potentially moving to New Zealand due to the growing pressures, and she expressed concern about the prospect of such families being forced to relocate. She stressed the importance of recognising both aquaculture and wild fishing as important and of supporting the development of both.

In relation to the Poseidon Report, Ms Whyte stated that, drawing on her experience as a consultant, she would normally speak directly to those involved before reporting on socioeconomics or fishing activity. She noted that the CFA had very short notice to comment on the report initially and emphasised that the organisation was small compared with Mowi. Despite this, they had worked hard to submit responses and engage constructively. She reiterated that the Mowi Report itself acknowledged limitations in the available data. She expressed continuing concern about safety, warning that increased overlap of activity increased the risk of entanglement, which had implications for life and safety at sea. She suggested that maintaining the current working relationship was the safest approach.

Regarding references to the planning committee and related criticism, she recognised that policy could be open to interpretation. She advised that, with experience in planning and governance and familiarity with the National Marine Plan, she considered that policy conflicts existed and required recognition.

Ms Whyte concluded by thanking the committee for listening to the presentation twice in one day and expressed appreciation for their time.

#### Kenny McNab, Chair of Clyde Fisherman's Association

Mr McNab began by thanking the Council, the Councillors, the officers present, and Mowi for the discussion, noting that it had been badly needed. He stated that he was unsure of the eventual outcome but expressed hope that the Council would support the smaller local operators and allow them to survive.

He highlighted that the fishing industry had contributed many millions of pounds to Argyll and Bute over the years. He noted that landings recorded in Argyll the previous year amounted to approximately £30 million from live fisheries, with most of this money remaining within Argyll and supporting local businesses. He stated that the sector had been consistent in delivering this level of economic contribution, particularly over the last seven or eight years.

Mr McNab stressed that he would not wish to see this economic benefit jeopardised for what he described as a small corner of a fish farm site. He explained that the seabed in the area in question was regularly surveyed through camera trials carried out by both the industry and Marine Scotland. These surveys counted the number of burrows and assessed prawn density, contributing to the annual quota-setting process. He reported that in some areas the density of burrows was particularly high, making the location especially important for the fishing sector.

He stated that the fishing community would not normally dispute a small extension to a fish farm, and that they did not object to all aquaculture developments. However, he emphasised that this specific location represented a red line for fishermen due to its significance for stock and livelihoods.

#### Supporters

There were no supporters in attendance.

## **Objectors**

### **Emma Kearns, Whitby Seafoods**

Ms Kearns advised that she had already provided all relevant information in her previous statement. She stated that offering further comments at this stage would only repeat what she had already set out and felt it was therefore best not to add anything further.

When asked, all parties confirmed that they had received a fair hearing.

## **DEBATE**

Councillor Armour advised the Chair that, should the Chair be minded to move the recommendations, he would bring forward an amendment. He stated that if the recommendations were not moved, he would instead move a motion.

The Chair advised that the meeting had moved into the debate stage. The Chair stated that they were content with the comments made during the discussion, noting in particular that the applicant had been consistent and compliant with the range of relevant policies. The Chair acknowledged the concerns raised regarding displacement, but considered that the proposal offered an opportunity for the business to expand while continuing dialogue with local fishermen. The Chair indicated that, on this basis, they were content to move the recommendations and associated conditions presented in the paper today.

Councillor Kennedy-Boyle began by recognising the significant amount of work, resources and effort that had been put into both applications considered by the committee. She also acknowledged the professionalism of the planning officers involved.

Having listened to the arguments and presentations, Councillor Kennedy-Boyle stated that she was minded to reach a different conclusion regarding the proposal for the North site. She referred to the National Marine Plan, noting in particular the sections relating to coexistence (4.16 and 4.17), which she felt carried considerable weight and required careful consideration.

She further highlighted National Planning Framework 4, specifically Policies 29 and 32, which she felt were highly relevant in light of the evidence heard, particularly from the fishing sector. She also drew attention to Local Development Plan 2, noting that Policy 28 spoke strongly to her concerns.

Councillor Kennedy-Boyle advised that, on the basis of these policy considerations, she was not able to support the application. She acknowledged the work undertaken to revise Condition 18, recognising that it represented an attempt to address areas of tension and conflict. However, she expressed the view that its application only after a positive decision would not be helpful. She concluded by stating that she wished to set out clearly the reasons underpinning her position.

Councillor Amanda Hampsey noted that her comments echoed those she had made earlier that morning. She stated that several credible points had been raised regarding the national framework that had just been discussed, and she confirmed that she agreed with those points. Councillor Hampsey then addressed Mr. McNab directly. She remarked that Mr. McNab was “a truly fascinating man” and emphasised that she meant this sincerely,

acknowledging him as a champion of the local fishermen. She stated that the insight he had provided to the committee was firmly rooted in lived experience and deep local knowledge, which she described as genuinely valuable and deserving of a wider audience. She added that everyone should hear the words he had shared with the committee. She stressed the importance of the community voice, particularly when decisions had such a direct impact on people's livelihoods. She commented that Mr. McNab's contribution had brought this sharply into focus. Councillor Hampsey thanked him for his input, noting that it provided a clear understanding of local knowledge, practical, historical, and based on real working experience, and highlighted how meaningful the area was to local fishermen.

## **MOTION**

That the Committee support the application as per the recommendation of officers.

Moved by Councillor Gordon Blair, seconded by Councillor Graham Hardie.

## **AMENDMENT**

From the concerns raised by the Clyde Fishermen's association I am of the view that existing commercial fishing opportunities have not been sufficiently safeguarded and this application should be refused as the increase in the total area of the development, encroaches into a valuable creel and commercial fishing area which will result in an unacceptable exclusion of commercial fishing activity from this important fishing ground which will result in a significant direct adverse effect on the commercial interests of the fishermen in this area and as such the application can be considered to be contrary to LDP2 Policy 28 and the relevant provisions of the National Marine Plan.

Moved by Councillor John Armour, seconded by Councillor Reeni Kennedy Boyle.

As the meeting was being held on a hybrid basis, the vote required to be taken by calling the roll and members voted as follows:

### **Motion**

Councillor Gordon Blair  
Councillor Kieron Green  
Councillor Graham Hardie  
Councillor Paul Kennedy

### **Amendment**

Councillor John Armour  
Councillor Jan Brown  
Councillor Amanda Hampsey  
Councillor Fiona Howard  
Councillor Reeni Kennedy Boyle  
Councillor Peter Wallace

## **DECISION**

The Amendment was carried by 6 votes to 4 and the Committee resolved accordingly.

(Reference: Report by Head of Development and Economic Growth dated 4 December 2025 and supplementary report 1 dated 16 December 2025, supplementary report 2 dated 26 March 2026 and supplementary report number 3 dated 26 March 2026, submitted)

The Chair thanked all attendees for their participation, noting that it had been a long day and expressing appreciation for members being present in person. The Chair also extended thanks to the officers supporting the meeting.