

# Marine Aquaculture Site **Port na Mine** **Etive 3**

## Annex 5. Screening Opinion

September 2024

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Argyll and Bute Council  
Comhairle Earra Gháidheal agus Bhóid

**Development and Economic Growth**  
Executive Director: Kirsty Flanagan



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23<sup>rd</sup> September 2024  
Our Ref: 24/01644/SCREEN  
Your Ref:

Contact : [REDACTED]  
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Dawnfresh Farming Ltd.  
Farms Office  
Glen Nevis Business Park  
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PH33 6RX

FAO: [REDACTED]

Dear Madam

**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)  
(SCOTLAND) REGULATIONS 2017**

**SCREENING OPINION FOR THE REPLACEMENT OF EXISTING 70M  
CIRCUMFERENCE PENS WITH SIX 120M CIRCUMFERENCE PENS, INSTALL  
LOW PROFILE FEED BARGE AND TRANSFER CONSENTED BIOMASS FROM  
ETIVE 2 AT PORT NA MINE (ETIVE 3) FISH FARM, INVERAWE, TAYNUILT**

Please find enclosed the Council's Screening Opinion in respect of the above development.

The Screening Opinion has been carried out because the proposed development falls within the applicable threshold for Schedule 2, Class 1(d) Intensive Fish Farming.

Having considered the matter in light of the information accompanying your screening request and having regard to the type and scale of development proposed and the degree of sensitivity of the receiving environment, the Council concludes that significant effects are not likely and an Environmental Impact Assessment is not, therefore, required.

Please find attached the screening opinion for the above development.

Should you require any further information please do not hesitate to get in contact.

Yours faithfully

[REDACTED]

[REDACTED]  
Major Applications Team Leader

## EIA SCREENING CHECKLIST

**INSTALLATION OF 6 X 120M CIRCUMFERENCE PENS AND 200 TONNE FEED BARGE AT PORT NA MINE FISH FARM (ETIVE 3), INVERAWE, TAYNUILT**

**ARGYLL & BUTE COUNCIL SCREENING OPINION UNDER THE TERMS OF THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017.**

Decision: EIA not required

### Section 1: Project Information

Please Describe	
Address or location of proposed development	Port Na Mine (Etive 3) fish farm, Inverawe, Loch Etive
Site area (hectares)	6 x 120m pens in a 75m grid, the moorings area would measure 35.7ha
Brief description of the proposed development	Replacement of existing 70m circumference pens with six 120m circumference pens, install low profile feed barge and transfer consented biomass from Etive 2
Type of Application (please tick)	<input checked="" type="checkbox"/> Application for planning permission
	<input type="checkbox"/> Application for planning permission in principle
	<input type="checkbox"/> Application for the approval of matters specified in conditions
	<input type="checkbox"/> Other permissions – please state: _____

### Section 2a: Single Stage Consent Application (complete where relevant)

Yes/No – Please Describe	
Is the proposed development of a type listed in Column 1 of Schedule 2?	Yes – Intensive Fish Farming Column 1, 1(d) which exceeds the thresholds stated in Column 2.
Is the proposed development to be located within a 'sensitive area'?	No – While there are sensitive areas nearby the development itself is not located within a sensitive area.
Does the proposed development meet any of the relevant thresholds and / or criteria in Column 2 of Schedule 2?	Yes - The proposed exceeds the thresholds stated in Column 2 namely; the development is designed to hold a biomass of 100 tonnes or more

**Section 2b: Multi Stage Consents (complete where relevant)**

Where the proposed development is of a type listed in Column 1 of Schedule 2 and either:

- is located wholly or in part within a sensitive area; or
- meets any of the relevant thresholds and / or criteria in Column 2 of Schedule 2

it will be necessary to consider whether the proposed development is likely to have significant environmental effects. In determining whether a proposed development is likely to have such effects, account must be taken of the selection criteria in Section 3 of this checklist.

Yes / No – Please Describe	
Does the proposed development change or extend development described in Column 1 of Schedule 2?	n/a
Does the application concern development to be located within a sensitive area?	n/a
Does the development as changed or extended meet or exceed any of the relevant thresholds and / or criteria in Column 2 of Schedule 2?	n/a
Is the proposed development of a type listed in Column 1 of Schedule 2?	n/a

Where an application for a proposed development is part of a multi stage consent and it changes or extends development described in Column 1 of Schedule 2, and where either:

- it is located wholly or in part within a sensitive area; or
- the development as changed or extended meets any of the relevant thresholds and / or criteria in Column 2 of Schedule 2

it will be necessary to consider whether the proposed development is likely to have significant environmental effects. In determining whether a proposed development is likely to have such effects, account must be taken of the selection criteria Section 3 of this checklist.

**Section 3: Selection Criteria for Screening Schedule 2 Development**

There are two stages to this section of the checklist:

- First, identifying the potential impacts of the proposed development based upon the characteristics of the development and its location.
- Secondly, considering whether significant environmental effects are likely based upon the characteristics of the potential impacts.

The selection criteria in this section meet the requirements of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 – Schedule 3 for screening Schedule 2 development.

Selection Criteria	Yes/No	Briefly describe potential impact	Is this likely to result in a significant effect? Please explain
<b>1. Characteristics of the Development</b>			
<b>(a) Size and design of the development</b>			
Will the proposed development be out of scale with the existing environment?	No	The proposal is for the enlargement and alterations to equipment at an existing marine fin fish farm. The existing fish farm has been operation for over 20 years. It is proposed that the existing 10 x 70m circumference pens in a 40m grid be replaced by 6 x 120m circumference pens in a 75m grid. A low profile hybrid powered barge is proposed which would have a 200 tonne feed capacity. AB increase in biomass of 250 tonnes is also proposed resulting in a total biomass of 708.4 tonnes.	<p>It is not considered that these changes are likely to result in a significant effect.</p> <p>The proposal would result in a fewer number of larger fish pens which would be moored in a larger grid. The proposal would also result in a larger biomass, however, this would be offset by the closure and removal of the Etive 2 fish farm from the loch meaning that there would be no overall increase in consented biomass on the loch.</p> <p>In terms of landscape and visual impact, the proposed fish farm will take up a greater area than the current farm but this will be offset by the removal of Etive 2. Significant effects are not considered likely and this issue can be considered through the submission a supporting landscape and visual impact appraisal.</p>
<b>(b) Cumulation with other existing and/or approved development</b>			
Will the proposed development lead to further consequential development or works?	Yes	The proposal will result in the removal of Etive 2 Fish Farm.	It is not considered that these changes would be likely to result in a significant effect as this would reduce the number of fish farm sites in Loch Etive.

Selection Criteria	Yes/No	Briefly describe potential impact	Is this likely to result in a significant effect? Please explain
Are there potential cumulative impacts with other existing development, approved developments or developments the subject of valid applications?	Yes	There would be the potential for cumulative impact with other fish farm developments on the loch.	<p>It not considered that this will result in likely significant effects. There will be one less fish farm on the loch and the overall biomass in the loch would not increase.</p> <p>The site would be operated in accordance with an Environmental Management Plan which would cover the whole of Loch Etive.</p>
Should the application for the proposed development be regarded as an integral part of a more substantial project? If so, can related developments which are subject to separate applications proceed independently?	No		
<b>(c) Use of natural resources, in particular land, soil, water and biodiversity</b>			
Will the proposed development use natural resources such as land, water, materials or energy, especially any resources which are non-renewable or are in short supply?	Yes	The proposed development would have a larger physical footprint than the existing farm at Etive 3 and would also have an increased biomass when compared to the existing farm at Etive 3. This may therefore have consequences for benthic ecology and the water column.	<p>The applicant has advised that the proposed changes have been modelled. This indicates that despite the biomass increase, the deposition footprint remains within the allowable mixing zone and that intensity of deposition is only 1.6% greater than at present.</p> <p>In terms of water column impacts it is noted that the proposal would relocated biomass from a fish farm less than 1km away. This would not result in any change to the assimilative capacity of the local environment. Both of these issues would be regulated by SEPA under CAR.</p> <p>It is not considered that this will result in likely significant effects.</p>
<b>(d) Production of waste</b>			

Selection Criteria	Yes/No	Briefly describe potential impact	Is this likely to result in a significant effect? Please explain
Will the construction, operation or decommissioning of the proposed development produce wastes?	Yes	The development has the potential to produce waste at the construction, operation and decommissioning phases of the development.	It not considered that this will result in likely significant effects. Discharges and pollution into the water environment will be controlled by a SEPA CAR licence and the applicant will have a waste management plan in place to control waste practices.
<b>(e) Pollution and nuisances</b>			
Will the construction, operation or decommissioning phases of the proposed development release pollutants or any hazardous, toxic or noxious substances to the air?	No		
Will the construction, operation or decommissioning of the proposed development lead to risk of contamination of land or water from releases of pollutants?	Yes	There is potential for the development to discharge waste and pollution from the operation of the fish farm. This may comprise fish feed and faeces and bath medications.	It not considered that this will result in likely significant effects. Discharges and pollution into the water environment will be controlled by a SEPA CAR licence.
Will the construction, operation or decommissioning phases of the proposed development cause noise, vibration or the release of light?	Yes	There is the potential for noise to be emitted during the construction, operation and decommissioning phases.	It not considered that this will result in likely significant effects. There is potential for noise to be generated from generators within the feed barge and from vessel operations and movements. The applicant proposes to use a barge powered by a hybrid system which will only use a generator to power the batteries. It is anticipated that there will be a reduction in noised emitted from the proposed development.  Noise during the construction, operational and decommissioning phases is not expected to be significant.

<b>Selection Criteria</b>	<b>Yes/No</b>	<b>Briefly describe potential impact</b>	<b>Is this likely to result in a significant effect? Please explain</b>
<b>(f) Risk of major accidents and/or disasters which are relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge</b>			
Will there be any risk of accidents during construction, operation or decommissioning of the proposed development which could affect the environment or human health?	No		
<b>(g) Risk to human health</b>			
Will the construction, operation or decommissioning phases of the proposed development involve the use, storage, transport, handling or production of substances or materials which could be harmful to human health?	No		

<b>Schedule 3 Selection Criteria</b>	<b>Yes/No</b>	<b>Briefly describe potential impact</b>	<b>Is effect likely to result in a significant effect? Please explain</b>
<b>Location of the Development</b>			
<b>(a) Existing and approved land use</b>			
Are there existing and/ or approved land / water uses in the locality of the proposed development site which could be affected by the proposed development?	Yes	The site may have the potential to affect commercial fishing and navigation. The site at Etive 3 will result in an increased mooring area, however the site at Etive 2 will be removed.	It not considered that this will result in likely significant effects which would require consideration through EIA process.
<b>(b) Relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground</b>			

<p>Are there any areas on or around the location of the proposed development and its underground which contain important, high quality or scarce resources which could be affected by the proposed development?</p>	<p>Yes</p>	<p>The proposal would have the potential to adversely affect benthic ecology and the water column.</p>	<p>It not considered that this will result in likely significant effects which would require consideration through EIA process. The existing Etive 3 farm, at current fish production levels is meeting SEPA' environmental standards for seabed quality. Predictive modelling indicates that the relocation of 250 tonnes of biomass from Etive 2 is within the environmental capacity of the site. This issue will be regulated by SEPA through a CAR licence.</p>
<p><b>(c) Absorption capacity of the natural environment</b></p>			
<p>Are there any areas on or around the application site that are protected under international or national legislation for their ecological, landscape, cultural heritage or other value which could be affected by the construction, operation or decommissioning of the proposed development?</p>	<p>Yes</p>	<p>Loch Etive Woods SAC Ailsa Craig SPA</p>	<p>The development would be adjacent to the Loch Etive Woods SAC which has Eurasian otter as a secondary qualifying feature. Otters forage in water which is less than 10m deep and within 100m of the shore no significant effects are anticipated.  The site lies within the mean foraging range for gannet for the Ailsa Craig SPA. There is the potential for these birds to become entrapped or entangled in the nets, however, subject to appropriate net size no significant effects are expected.</p>
<p>Are there any other areas on or around the location which are important or sensitive for reasons of their ecology which could be affected by the proposed development? Particular attention should be paid to the following areas: wetlands, riparian areas, river mouths; (ii)coastal zones and the marine environment; (iii)mountain and forest areas; (iv) nature reserves and parks.</p>	<p>Yes</p>	<p>The site may have the potential to attract predators that may become entangled and entrapped in nets.</p>	<p>The site will be operated in accordance with a Predator Control Plan which would be submitted in supported of the planning application. In addition, the applicant has confirmed that Acoustic Deterrent Devices will not be deployed thus avoiding disturbance to cetaceans.  Subject to the above no likely significant effects are expected.</p>

Are there any areas on or around the location which are used by protected, important or sensitive species of fauna or flora which could be affected by the proposed development?	Yes	The development has the potential to affect wild salmonids through the spread of parasites and disease and introgression through escape.	It not considered that this will result in likely significant effects. Sea lice will be controlled through regulation by SEPA and an EMP. The applicant will also be required to provide equipment attestations and escapes contingency plans.
Are there any groundwater source protection zones or areas that contribute to the recharge of groundwater resources which could be affected by the proposed development?	No		
Are there any areas on or around the location of the proposed development where environmental quality standards are already exceeded which could be affected by the proposed development?	No		
Are there any areas on or around the location which are densely populated which could be affected by the proposed development?	No		
Is the proposed development in a location where it is likely to be visible to many people?	Yes	The proposal is to replace ten smaller fish farm cages with six larger cages and a feed barge. This may have visual and landscape consequences.	It not considered that this will result in likely significant effects which would require assessment through the EIA process. The proposal could be adequately assessed through the submission of additional information supported with the planning application.
Are there any routes or facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the proposed development?	Yes	The proposal is to replace ten smaller fish farm cages with six larger cages and a feed barge. This may have visual and landscape consequences for sensitive receptors visiting the area.	It not considered that this will result in likely significant effects which would require assessment through the EIA process. The proposal could be adequately assessed through the submission of additional information supported with the planning application.

Are there any areas of local landscape or scenic value on or around the location which could be affected by the proposed development?	Yes	The site is located within the North Argyll Local Landscape Area. The Loch Etive Mountains Wild Land is located approximately 1.5km from the site.	It not considered that this will result in likely significant effects which would require assessment through the EIA process. This issue could be adequately assessed through the submission of additional information supported with the planning application.
Are there any areas of features of historic, cultural or archaeological value on or around the location which could be affected by the proposed development?	Yes	There are a number of historic features in the vicinity of the site.	It not considered that this will result in likely significant effects which would require assessment through the EIA process. This issue could be adequately assessed through the submission of additional information supported with the planning application.
Is the proposed development location susceptible to earthquakes, subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions?	No		

### Schedule 3 Selection Criteria

#### 3. Characteristics of the Potential Impact

##### (a) Magnitude and special extent of the impact (for example geographical area and size of the population likely to be affected)

Will the effect extend over a large geographical area, affecting many people and resulting in social changes, e.g. in demography, traditional lifestyles, employment?

**No**

##### (b) Nature of impact

Is the development located within or close to any other areas which are protected under international, EU, or national or local legislation for their ecological, landscape, cultural or other value, which would be significantly affected by the development?

**No**

##### (c) Transboundary nature of the impact

Will there be any potential for transboundary impact?

**No**

##### (d) Intensity and complexity of the impact

Is there a risk that environmental standards will be breached?

**No**

##### (e) Probability of the impact

Is there a high or low probability of a potentially highly significant effect?

**Low**

**(f) Expected onset, duration, frequency and reversibility of the impact**

Will the effect be permanent, continuous or irreversible?

**The effects will be continuous while the fish farm is in operation, however, the fish farm could be easily removed from the site if no longer required.**

**(g) Culmination of the impact with the impact of other existing and/or approved development**

Will the Project have cumulative effects, due to its proximity to other existing or planned Projects with similar effects?

**There is the potential for cumulative effects with other fish farms on Loch Etive, however, it is not considered that these will be significant as there will be no increase in biomass overall on the loch and one less fish farm.**

**(h) Possibility of effectively reducing the impact**

Will there be any significant adverse effects on any aspect of the environment during the construction and operational phases of the development, has the developer included mitigation measures to avoid, prevent, repair or reduce the potential impact?

**There will be no significant adverse effects on the environment during the operational and construction phases of the development. All mitigation will be detailed in supporting documents and could be controlled through planning conditions, as appropriate, if planning permission is granted.**

**EIA is not required**