

The Highland Council
Planning, Development & Infrastructure Committee

2 November 2016

Agenda Item	17
Report No	PDI/ 72/16

Aquaculture Planning Guidance

Report by Director of Development and Infrastructure

Summary

This report outlines the Aquaculture Planning Guidance developed to support the aquaculture and related policies in the current Highland-wide Local Development Plan.

It is recommended that members approve the guidance and note the responses to comments received during the previous consultation.

1. Background

- 1.1 Draft aquaculture supplementary guidance was subject to consultation from 25 May to 19 July 2015, following Committee approval on 18 February 2015 (Report No. PDI-18/15). Following consideration of comments received, set out in **Appendix 2**, the enclosed Aquaculture Planning Guidance at **Appendix 1** is presented to Committee for adoption as planning guidance.
- 1.2 This document has been prepared to provide clear guidance on the implementation of existing policies set out in the adopted Highland-wide Local Development Plan. The guidance does not introduce any new policy; rather, it provides more detailed guidance on the key material considerations for determining marine fish farm applications. It also provides clearer guidance to developers and other interested parties to support high quality submissions.
- 1.3 It should be noted that this does not hold the same status as statutory Supplementary Guidance but it would be a material consideration in the determination of planning applications.

2. Key elements of the guidance

- 2.2 The guidance (set out in **Appendix 1**) contains background information, a spatial strategy and six development criteria: Landscape/Seascape; Historic Environment; Biodiversity; Water Quality; Other Marine Users and Construction, Operation and Decommissioning.
- 2.3 We have fully considered the comments made on the draft Supplementary Guidance (set out in **Appendix 2**) which was subject to consultation last year. One of the most significant changes is the removal of the spatial strategy map. Comments received highlighted that the spatial strategy map caused confusion and a criteria based approach was preferred. A number of other changes were

made to ensure that the document reflected the adopted Highland-wide Local Development Plan only, with the status of the document also being amended to Planning Guidance.

3. Implications

- 3.1 There are no direct legal, resource, equality, climate change/Carbon CLEVER, risk, rural or Gaelic implications arising from this report.

Recommendation

The Committee is invited to approve the Aquaculture Planning Guidance at **Appendix 1**, and to note the responses to comments raised on the previous consultation as set out in **Appendix 2**.

Designation: Director of Development and Infrastructure

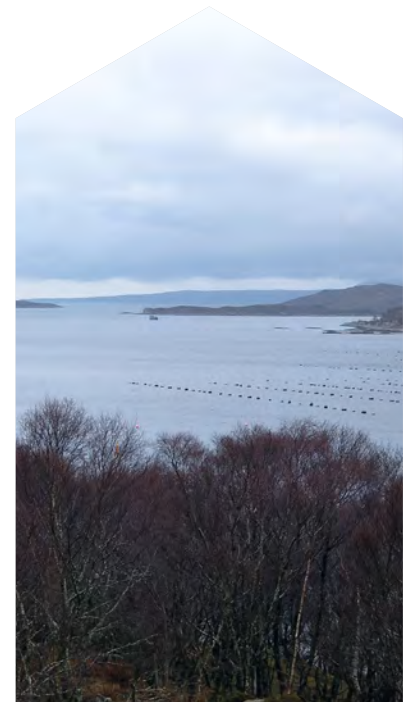
Date: 3/10/2016

Author: Dr Shona Turnbull

Background Papers: Appendix 1 – Aquaculture Planning Guidance
Appendix 2 – Response to comments received

Aquaculture Planning Guidance Stiùireadh Dealbhaidh Tuathanachais-uisge

Autumn 2016



Foreword

The purpose of this document is to provide planning guidance and information for the aquaculture industry, statutory consultees and third parties to support environmentally, economically and socially sustainable aquaculture development in Highland.

- The aim of this Aquaculture Planning Guidance is to guide development to those locations that are considered to have more opportunity with fewer constraints to development; or to where those constraints can be mitigated through, for example, sensitive equipment design or working practises. The guidance will also assist in the streamlining of the process of preparing, submitting and determining aquaculture planning applications.
- The guidance is also designed to help improve the quality of planning applications submitted for aquaculture development by ensuring that all relevant information is provided by developers at the outset and that the Council can have clear policy guidance for planning decisions.

Status

This is planning guidance for aquaculture sets out the proposed spatial strategy and development criteria against which future fish farming development proposals in Highland would be assessed. It reflects policy advice provided in the Highland-wide Local Development Plan and Scottish Planning Policy.



Contents

Supplementary Guidance

1 Introduction	3
2 Spatial Strategy	14
3 Development Criteria	23
4 Additional Sources of Information	43

Annex

1 Diagram of aquaculture planning process	50
Table 1 Role of key organisations involved in the aquaculture planning process.	11
Table 2 Background to maps 1-6	14
Table 3 Development Criteria	23
Table 4 Examples of other marine users and potential interactions with aquaculture development.	38

Purpose

1.1 This non statutory Aquaculture Planning Guidance provides guidance to support the *Aquaculture* policy of the Highland wide Local Development Plan (HwLDP). It aims to support sustainable development of marine and freshwater aquaculture within appropriate sites around Highland. It provides a spatial strategy and a suite of development criteria against which aquaculture planning applications will be assessed, in agreement with national and local policy guidance and legislation. This Aquaculture Planning Guidance must be read in conjunction with the Highland wide Local Development Plan and any related policy guidance.

1.2 The Highland wide Local Development Plan supports the sustainable development of finfish and shellfish farming subject to there being no significant adverse effect, directly, indirectly or cumulatively on the natural, built and cultural heritage and existing activity (see Box 1). The Council has also produced a range of other guidance, which are relevant to the consideration of aquaculture development. In particular but not limited to, Supplementary Guidance on '*Highland Statutorily Protected Species*', '*Physical Constraints*', '*Special Landscape Areas*' and the '*Highland Historic Environment Strategy*' and the Aquaculture Framework Plans are relevant.

1.3 The Highland wide Local Development Plan (HwLDP) remains the key planning policy document for Highland; planning applications for fin fish and shellfish developments will be assessed in accordance with the policies within it. The Council has commenced a review of relevant policies in the HwLDP. For aquaculture, Policy 50 Aquaculture (see Box 1), along with Policy 28 Sustainable Design and the policies relating to biodiversity and landscapes, are generally the most relevant. This review will include the associated Aquaculture Framework Plans, integrated coastal plans and the Highland Coastal Development Strategy, which remain in force during this period. However it is recognised that some of these supporting documents, or elements within them, may be somewhat outdated. The policies that emerge through the review will include reference to and be compatible with this planning guidance. This is considered to be the most appropriate approach to ensure that developers have clear policy guidance to support the sustainable growth of the aquaculture industry.

1.4 Section 2 of this document sets out the spatial strategy that guides developers to areas of potential growth and highlights area of sensitivity. Section 3 details the development criteria that will be used to assist the assessment of fish farming development planning proposals. Background information and links to key supporting documents are provided in Section 4. Information boxes are provided throughout the document to clarify key points.

1 Introduction

Box 1

Existing Policy 50 of the Highland wide Local Development Plan*

The Council supports the sustainable development of finfish and shellfish farming subject to there being no significant adverse effect, directly, indirectly or cumulatively on:

- the natural, built and cultural heritage, taking into consideration:
 - landscape character, scenic and visual amenity with reference to SNH commissioned report: landscape/seascape carrying capacity for aquaculture;
 - the classification and objectives set out in the river basin management plan for the Scotland river basin district and supplementary area management plans;
 - wild fish populations;
 - biological carrying capacity;
 - and cumulative benthic and water column impacts - for finfish proposals support is conditional on proposals being consistent with Marine Scotland's Locational Guidelines for the authorisation of Marine Fish Farms in Scottish Waters;
 - habitats and species, including designated sites and protected species;
- existing activity, taking into consideration:
 - commercial inshore fishing grounds;
 - existing and consented aquaculture sites;
 - established harbours and natural anchorages and navigation (including recreational);
 - the location of existing/proposed pipelines/outfalls and discharge points for treated waste water and storm water.

All proposals will be subject to detailed assessment in these terms. Where proposals are located on a suitable site they will also need to show:

- appropriate operational and site restoration arrangements (including management of noise and lighting aspects, public health and safety, and the effective control of pollution, fish farm escapes, predator interaction and disease);
- good design of cages, lines and associated facilities (please refer to Marine Aquaculture and the Landscape: The siting and design of marine aquaculture developments in the landscape SNH);
- that opportunities for shared use of jetties, piers and ancillary facilities are promoted where possible.

There is a national presumption against expansion of marine fin fish farm on north and east coasts. This does not preclude shellfish farming in these areas. More detailed policy relating to key pressure areas for aquaculture is given through the Council's Aquaculture Framework Plans and Integrated Coastal Zone Management Plans, which the Council intends to adopt as Supplementary Guidance to this Plan.

Where new fish farm provision will result in existing fish farm infrastructure becoming redundant, we will seek the removal of the redundant infrastructure as a requirement of the development.

The core principles of the Highland Council's aquaculture framework plans and coastal development plans are similar. However, coastal development plans cover all sectors and are relevant to proposals for all types of installations in coastal waters. The aquaculture framework plans will:

- guide the location and scale of aquaculture development;
- ensure that development is environmentally sustainable;
- identify both opportunities and constraints so that developers have a realistic idea of the development potential and other interests which should be taken into account;
- provide an overview for the use of the coastal waters and promote a balanced approach which can safeguard the area's core natural assets and sustain or enhance its productivity over the longer term;
- aim to guide investment, help in the evaluation of development proposals, and help to minimise conflicts of interest.

* see paras 1.2-1.3

Background

1.5 Aquaculture in Scotland is an important industry, creating and supporting employment, particularly in remote areas. Figures prepared by the Scottish Government indicate that output of the sector in 2014 was around 188,000 tonnes. Of this, salmon accounted for 95% of the output. In Highland the industry makes an important contribution to the local economy, particularly within areas on the north and west coasts where employment opportunities may otherwise be limited. Much of this activity takes place in fragile areas as defined by the Highlands and Islands Enterprise, and as supported by Policy 36 in the HwLDP. It provides around 382 FTE jobs directly from fin fish based on the North West coast, ⁽¹⁾ with many more across the supply chain. In addition, there are 49 registered shellfish farming businesses with around 74 active shellfish sites in Highland, of which about 32 are producing shellfish for human consumption ⁽²⁾. This economic investment by both fin fish and shellfish businesses in turn generates social benefits.

1.6 In terms of value and production volume, fin fish farming is the main aquaculture activity taking place in Highland, contributing to food security. Production is focused on Atlantic Salmon in the marine environment, which leads to the need for salmon smolt production in freshwater cages and land based farms. There is a small volume of trout farmed in sea cages and some rainbow trout and brown trout in the freshwater environment. Historically there has been interest in diversifying production into species such as Cod, Haddock and Halibut. There is recent, renewed interest in rearing wrasse and other species such as lumpsucker to assist in the biological control of sea lice on farmed salmon.

1 (MSS, 2016a *Scottish Fish Farm Production Survey 2015*)

2 (MSS, 2016 *Scottish Shellfish Farm Production Survey 2015*)

1 Introduction

1.7 As outlined above, shellfish farming is also important to the Highland economy. This is dominated by the rope grown culture of mussels but there are a number of sites farming scallops and an increasing interest in farming both native and Pacific oysters. Other novel species such as sea urchins have been considered by developers from time to time.

1.8 Aquaculture for the purposes of this document covers “fish farming” which is legally defined in the Town and Country Planning (Scotland) Act 1997 as ‘the breeding, rearing or keeping of fish or shellfish (which includes any kind of crustacean or mollusc). This was amended by the The Town and Country Planning (Marine Fish Farming) (Scotland) Regulations 2013 to include any kind of sea urchin. Seaweed cultivation is not covered by this Act (see Box 2).

Box 2

Seaweed Harvesting and Culture

The Scottish Government consulted on a policy statement regarding commercial seaweed cultivation as well as options for managing the sustainable growth of the seaweed wild harvesting industry. The consultation analysis is now available (see further information Section 4) and the final policy statement will be published in due course. Once more details are available, subsequent guidance can be updated.

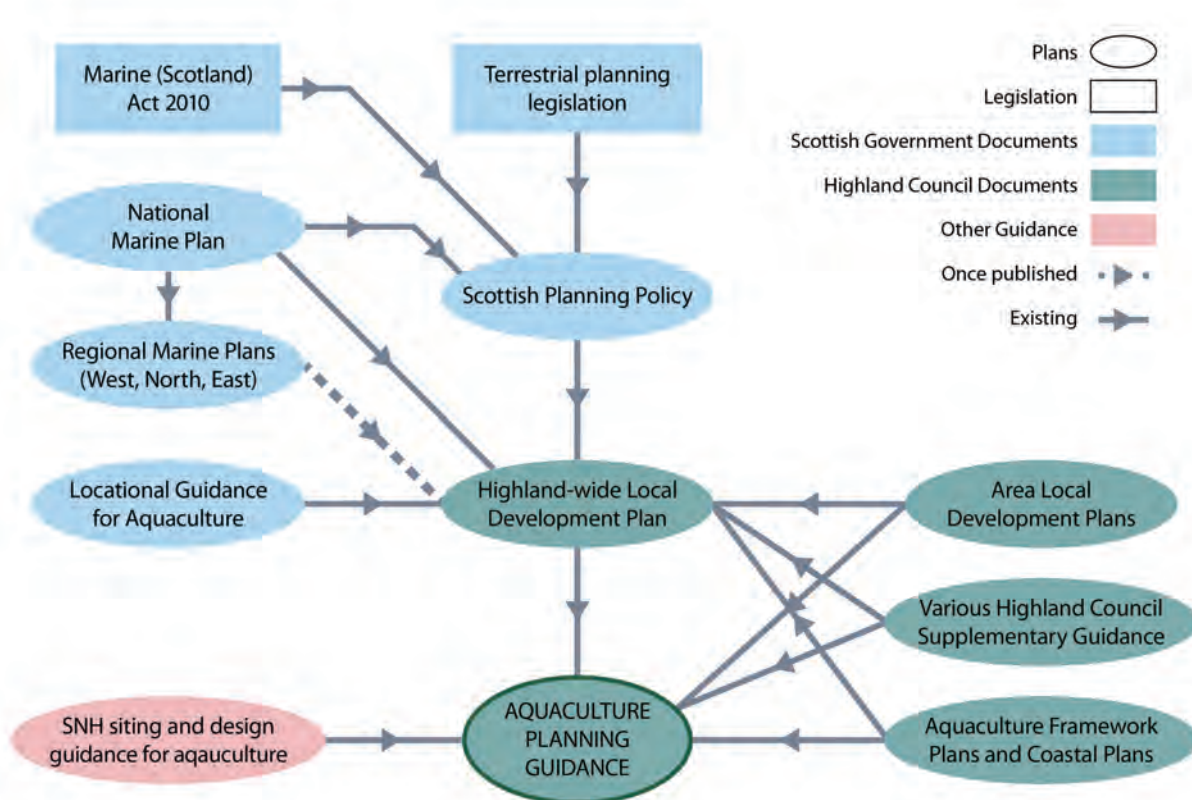
Legislation and policy guidance

1.9 When making or determining planning applications for fish farming, there are a number of legislative considerations and policy guidance documents to aid developers and planners, as discussed below.

1.10 The Town and Country Planning (Marine Fish Farming) (Scotland) Order 2007 came into force, giving local planning authorities responsibility for all aquaculture developments in marine waters in Scotland, in accordance with s26 of the Town and Country Planning (Scotland) Act 1997, taking into account any subsequent amendments. This applies to all new fish farms out to 12 nautical miles including modifications to existing ones, although the role of the planning authorities currently only extends to 3 nautical miles ⁽³⁾. Figure Figure 1 shows how this guidance sits within planning policy and legislation.

3 see Circular 1/2015

Figure 1 Schematic of where the Highland Aquaculture Supplementary Guidance fits with other key plans, policies and legislation.



1.11 At national level, Scottish Planning Policy (SPP) notes that ‘aquaculture makes a significant contribution to the Scottish economy, particularly for coastal and island communities...’ and ‘Planning can help facilitate sustainable aquaculture whilst protecting and maintaining the ecosystem upon which it depends.’ Industry targets, supported by Scottish Government, are to increase sustainable production of marine finfish by 50% and shellfish by 100% by 2020, based on a 2009 baseline.

1.12 To help underpin the growth targets, the government produced ‘A Fresh Start – the Renewed Framework for Scottish Aquaculture (2009)’. One of the key themes in the Framework was to address ‘planning, consents and sites’ so that development occurred within the ‘right’ sites and in the ‘right’ location. It states that this should be done through transparent, streamlined and proportionate regulation to minimise adverse impacts on other users of the marine and freshwater environment.

1.13 Circular 1/2007 *Planning Controls for Marine Fish Farming* provides guidance on the Acts, Regulations and Orders relevant to planning controls over marine fish farming. It is understood that this circular is being updated at the time of writing. The Aquaculture and Fisheries (Scotland) Act 2013 provides further regulatory and technical guidance, primarily in relation to fish health and containment.

1 Introduction

1.14 To ensure the integration of land use and marine planning, the Marine (Scotland) Act 2010 makes provision for the production of marine plans, which must integrate with land use planning. All public authorities making decisions that affect or might affect the UK marine area must therefore do so in accordance with the UK Marine Policy Statement, the Scottish National Marine Plan and any subsequent Regional Marine Plan, unless relevant considerations indicate otherwise. This applies, but is not limited to, decisions on marine licensing, consents under Section 36 of the Electricity Act 1989 (as amended) and terrestrial planning applications and enforcement.

1.15 Public bodies must have regard to the UK Marine Policy Statement and relevant Marine Plans when making decisions that are capable of affecting the UK marine area. This applies to the preparation and adoption of local development plans and to other terrestrial planning functions.

Decision making processes and application procedures

1.16 All aquaculture planning applications will be assessed on an individual case-by-case basis, based on the appropriate legislation, policy and guidance, as outlined throughout this document.

1.17 Applications for most finfish farms will require assessment under the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2011. This involves screening, scoping and Environmental Statement stages, where appropriate. There is currently no requirement for shellfish sites to undergo EIA assessment but the planning authority has the right to request all the environmental information it requires in order to determine an application.

1.18 Regulation (EC) 853/2004 specifies the health standards for the production and placing on the market of live bivalve molluscs, tunicates, echinoderms and marine gastropods, such as mussels, oysters, scallops and razor fish. Under European Regulation (EC) 854/2004 the Food Standards Scotland, as competent authority, must undertake Sanitary Surveys relating to official controls on live bivalve molluscs intended for human consumption and identify appropriate production area boundaries for all new shellfish production areas⁽⁴⁾. The local authority environmental health department acts on behalf of Food Standards Scotland to ensure that end product standards are met for shellfish sold for human consumption.

1.19 Any proposal in, or likely to affect, a designated Natura 2000 site (see Box 3; Map 3 in the Spatial Strategy) may also have to undertake an Appropriate Assessment under the Habitats Regulations Appraisal process. The assessment is based on the conservation objectives and qualifying interests of the designated site. The Council must not authorise a development unless, by means of an Appropriate Assessment, it can ascertain that it will not adversely affect the integrity of a Natura site.

4 (FSS, 2015 <http://www.foodstandards.gov.scot/food-safety-standards/advice-business-and-industry/shellfish>)

Box 3

Natura & Ramsar Sites & Marine Protected Areas

Natura is the term given to Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). These internationally important sites are designated under the EU Habitats and Birds Directives.

Ramsar sites are designated as internationally important wetlands. All Ramsar sites in Scotland are also either SPAs or SACs.

Of the 30 Marine Protected Areas (MPAs) designed in July 2014, 17 fall under the Marine (Scotland) Act 2010 in Scottish territorial waters and 13 in offshore waters under the Marine and Coastal Access Act 2009.

1.20 In addition to the Natura sites, helping to build an ecologically coherent network of sites, Nature Conservation Marine Protected Areas (MPAs) have been identified. These are for the protection of nationally important marine biodiversity and geodiversity features (see Development Criterion 3 for further information).

1.21 The Town and County Planning (General Permitted Development) (Fish Farming) (Scotland) Amendment Order 2012 allows for some minor alterations to aquaculture developments without the need for planning permission. However, developers must notify the local Planning Authority prior to undertaking any site alterations or extensions; this process is known as 'prior notification'.

1.22 Planning Circular 1/2015: *The relationship between the statutory land use planning system and marine planning and licensing* requires public bodies to have regard to the relationship between the marine and terrestrial planning systems. This requirement is reflected in the National Marine Plan. This integration will be considered in more detail in the revised Local Plans as they are updated. As most aquaculture developments have some on-shore requirements e.g. shore base, storage, depuration/grading facilities, these should be considered within the planning application submissions, where possible.

1.23 The Highland Council established a pre-application advice service to provide clear, detailed guidance on development proposals. This approach was subsequently supported by Aquaculture Policy 10 in the National Marine Plan. Since May 2015, the Council has introduced a payment scheme for this service. This process helps ensure developers are aware of the key issues that need to be considered when planning a new site or modification/alteration/extension to an existing one. It can help avoid costly delays at a later stage and ensure developers are aware of the key material planning considerations likely to affect their proposals (see Section 4).

1.24 Planning applications will be assessed for compliance with the policies of the Highland wide Local Development Plan or any subsequent local authority development plan, any relevant supporting guidance and other material considerations, including this planning guidance. Development proposals must therefore comply with all relevant policies within the HWLDP and the supporting guidance. Where compliance cannot be assured in the first instance, the attachment of planning conditions may allow proposals to proceed. The application process is outlined in

1 Introduction

Figure 2, Annex 1. As mentioned above, each individual application will be assessed on a case-by-case basis, including cumulative impacts, therefore the individual requirements for each application will determine which elements of the guidance are relevant.

1.25 When assessing a planning application, the Planning Authority will consult with various statutory consultees, depending on the type of application to be assessed, in accordance with the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013. Depending on the type of application being assessed, these may include:

- Scottish Ministers (done via Marine Scotland Science)
- Scottish Environment Protection Agency (SEPA)
- Scottish Natural Heritage (SNH)
- Historic Scotland and
- the relevant District Salmon Fishery Board (see Table 1).

1.26 In addition, the following may also be consulted, dependant on the type of application: Scottish Ministers via other Scottish Government departments, Ministry of Defence, Scottish Water, local harbour authority or any other organisations as may be applicable.

1.27 In accordance with legislation, applications for fish farms are also advertised, both on The Highland Council e-planning portal and in a newspaper circulating in the location of the development. This gives the local community and any other interested parties the opportunity to comment on proposals. Depending on the location, some freshwater sites and shore based development may also have 'neighbour notification' requirements, whereby residents within 20 meters of a proposed development are notified. This may also apply to access requirements for shellfish farms on the foreshore.

1.28 The development hierarchy sets scale thresholds at which development become 'Major' development. For marine fish farms, major developments are those with an equipment surface area exceeding 2.0 hectares and therefore require additional consultation (see Section 4 for further information). All applications involving major development are expected to be made the subject of the council's major pre-application process and be accompanied by a Processing Agreement. The purpose of these agreements is to set realistic and achievable time scales on when an application will be determined, providing key milestones and targets that allow the process to be progressed in more formal project managed manner. In some instances, it may also be appropriate to have a processing agreement for local (i.e. non-major) planning applications.

1.29 Any planning permission granted will be for the benefit of the particular installation equipment within the specific location and for the culture of the species applied for. Planning permission is generally granted subject to a number of conditions. When a development is not operated within the confines of this permission it may be unauthorised development and enforcement action may be taken. This is a formal process undertaken in accordance with the Town and Country Planning (Scotland) Act 1997 (as amended).

The role of other organisations

1.30 In addition to planning permission, aquaculture sites require a number of other consents and licences and advice depending on the type of aquaculture development proposed. Table 1 below outlines the main roles of each organisation. The Planning Authority will ensure that planning controls exercised do not duplicate the controls and licensing requirements of other agencies. However, as the EIA template provided by Scottish Ministers for marine fish farming, which is widely used by the finfish sector, requires information for other agencies relating to their consenting process, some overlap is likely. In some cases, some statutory consultees cannot provide comment on an application until such time as certain data have been provided.

1.31 Further information on the role of the main statutory bodies is provided in the 'Working Arrangement Requirements for Statutory Consultees' document (see Section 4). Scottish Water is listed as one of statutory consultees in the planning legislation, but it is not listed in the aforementioned document or in the planning circular on controls for marine fish farming. However, Scottish Water request it be consulted on all applications.

Table 1 Role of key organisations involved in the aquaculture planning process.

Organisation	Applies to Finfish: Y/N	Applies to Shellfish: Y/N
Statutory Consultees		
Marine Scotland (MS)		
Marine Scotland enforces provisions under the Aquaculture and Fisheries (Scotland) Act 2007 in relation to containment and parasite control of the farmed species.	Y	Y
It also implements measures that regulate the movement of live fish with a view to preventing the spread of fish/shellfish diseases and non-native species.	Y	Y
It issues a marine licence covering navigation issues and deposits in the marine environment, including discharges from well boats when used for treating fish.	Y	Y
When a commercial activity could cause disturbance to a European Protected Species, MS may issue a licence for the activity.	Y	Y
MS is the licensing authority for the control seals under the Marine (Scotland) Act 2010. It can issue licenses for the killing of seals to protect the welfare of farmed fish.	Y	N
It issues consents for an Aquaculture Production Business Authorisation.	Y	Y
Scottish Environment Protection Agency (SEPA)		

1 Introduction

Organisation	Applies to Finfish: Y/N	Applies to Shellfish: Y/N
<p>Under the Water Environment (Controlled Activities) (Scotland) Regulations 2011, SEPA regulates activities which may pose a risk to the water environment. For finfish farming, SEPA sets limits on the types and amount of fish that be held in a cage configuration (fish biomass) and the amount of medicines (chemotheraputants) that can be administered and thus discharged into the environment from the fish cages. Known as a CAR licence, sites are assessed on the likely effects of discharges from a development on both the water column and the benthic environment. Shellfish farms are not regulated by SEPA under the CAR regulations.</p>	Y	N
Scottish Natural Heritage (SNH)		
<p>Scottish Natural Heritage is the statutory advisor in relation to Scotland’s natural heritage. It advises on the Conservation (Natural Habitats, &c.) Regulations 1994 with regard to Natura sites (Special Areas of Conservation and Special Protection Areas), Marine Protected Areas and for European Protected Species. It also advises on other biodiversity, such as bird licensing, and landscape issues.</p> <p>It has produced two key documents to aid development:</p> <p><i>The Siting and Design of Aquaculture in the Landscape: Visual and Landscape Considerations 2011</i> and ‘<i>Guidance on Landscape/Seascape capacity for Aquaculture 2008</i>’.</p>	Y	Y
District Salmon Fisheries Boards (DSFBs)		
<p>Where a finfish aquaculture development falls within the boundary of an area covered by a DSFB, that DSFB becomes a statutory consultee. Where developments are proposed outwith such an area Scottish Ministers fulfil the role of the DSFB through Marine Scotland.</p>	Y	N
Ministry of Defence (MOD)		
<p>The MOD is only consulted when there is a possibility that a marine war grave has the potential to be disturbed by a development.</p>	Y	Y
Scottish Water		
<p>Scottish Water requests that aquaculture development does not impact on its assets that provide clean, safe drinking water. Development should therefore ensure it is located where it will not lead to Scottish Water being required to upgrade infrastructure to comply with a shellfish designation.</p>	Y	Y

1 Introduction

Organisation	Applies to Finfish: Y/N	Applies to Shellfish: Y/N
Statutory Consultees: EIA applications only		
Historic Scotland		
Advise on aspects of cultural heritage of national significance. Historic Scotland has responsibility for management of the Historic Marine Protected Areas designated in 2013 to protect historically important shipwreck sites.	Y	N
Transport Scotland		
On behalf of Scottish Ministers, Transport Scotland provide advice on transport related issues.	Y	N
Other organisations with a role in aquaculture planning and consenting		
Crown Estate Commissioners		
<p>The Crown Estate manages approximately 50% of the foreshore, the beds of most tidal rivers and almost all of the territorial seabed out to 12 nautical miles. Most aquaculture developments will therefore require the necessary permissions from them to implement any planning consent, generally in the form of a seabed lease.</p> <p>Naturally occurring oysters and mussels in Scottish territorial waters form part of the ancient rights currently administered by the Crown Estate Commissioners. Preparations have been made for the transfer of existing rights and titles to Marine Scotland, on behalf of the Scottish Ministers.</p>	Y	Y
Harbour Authority		
Where a development lies within or adjacent to a harbour authority area, it may provide advice on navigational or operational issues.	Y	Y

2 Spatial Strategy

Background

2.1 Given the complex hydrological and ecological requirements for aquaculture, it is beyond the remit of the council to assess realistic likely areas for growth, especially given the large geographic range of the Highland area. The Spatial Strategy does guide aquaculture developers to locations of least sensitivity for sustainable development and highlights areas of constraint. It aligns with the Scottish Government and The Highland Council's objectives to support sustainable development of the aquaculture industry. It identifies areas sensitive to new or further fish farming development (see Maps 1-6 below).

2.2 The areas have been identified through the consideration of a range of material planning issues that have the potential to be affected by aquaculture development. These areas take into consideration the physical character of the area. The strategy also takes into account elements of the physical dynamics of the water bodies that are assessed by Marine Scotland.

2.3 Table 2 provides the rationale for the spatial strategy and a brief overview of the accompanying maps. Due to the large geographic area of Highland, it is recognised that the level of detail that can be shown is limited. Many of the designations do not prevent development within them but proposals may require additional consideration. These maps can only provide a static snap-shot, but more detailed, regularly up-dated mapping, including fine scale aspects, can be found on the National Marine Plan interactive (NMPI) website, hosted by Marine Scotland (see Section 4).

Table 2 Background to maps 1-6

Map No./Title	Comment
1: Existing Aquaculture Sites	This map shows sites that have been granted planning permission or have been registered as "active" with the Fish Health Inspectorate. Some sites consented by Scottish Ministers under s31A (The Audit and Review process) do not have defined planning boundaries, particularly those farms covered by the 2011 Order therefore the Council will refer to the previous Crown Estate lease where appropriate/available.
2: Shellfish Water Protected Areas	These areas are designated by Scottish Government and monitored by SEPA to ensure the continued protection and improvement of Scotland's shellfish growing waters.
3: Environmental Designated Areas	Sites designated for environmental reasons are covered by a range of legislation to ensure these assets and resources are maintained.
4: Wild Land Areas and National Scenic Areas	SNH guidance states that Wild Land Areas "are identified as nationally important in Scottish Planning Policy, but are not a statutory designation."
5: Seal Haul-Out Sites	These are areas designated under The Protection of Seals (Designation of Seal Haul-Out Sites) (Scotland) Order 2014 to protect seals from harassment at their haul-out sites. It is acknowledged

2 Spatial Strategy

Map No./Title	Comment
	that there are other areas used by seals which are not covered by the Order.
6: Presumption Against Further Marine Finfish Developments	Scottish Planning Policy (SPP) (2014) retains a presumption against further marine finfish farm developments on the north and east coasts to safeguard migratory fish species.

2.4 In addition to the maps discussed, there are a number of other key spatial considerations that must be taken into account when considering aquaculture developments. For example Marine Scotland produces locational guidelines maps. These maps classify sea lochs into category 1, 2 or 3 areas based on predictive modelling to estimate the nutrient enhancement and benthic impacts. As these maps are updated quarterly, developers should check the Marine Scotland website for the most up to date classifications and guidance. The modelling does not take other factors such as biodiversity, landscape or amenity impacts into account and does not use the classifications over large areas of the coast, which relies on other modelling.

2.5 Shellfish Harvesting Classifications are determined and reported on by the Food Standards Scotland (FSS). As these are regularly updated, developers should consult the FSS website for the latest information.

2 Spatial Strategy

Spatial Strategy

Areas of Potential Sensitivity

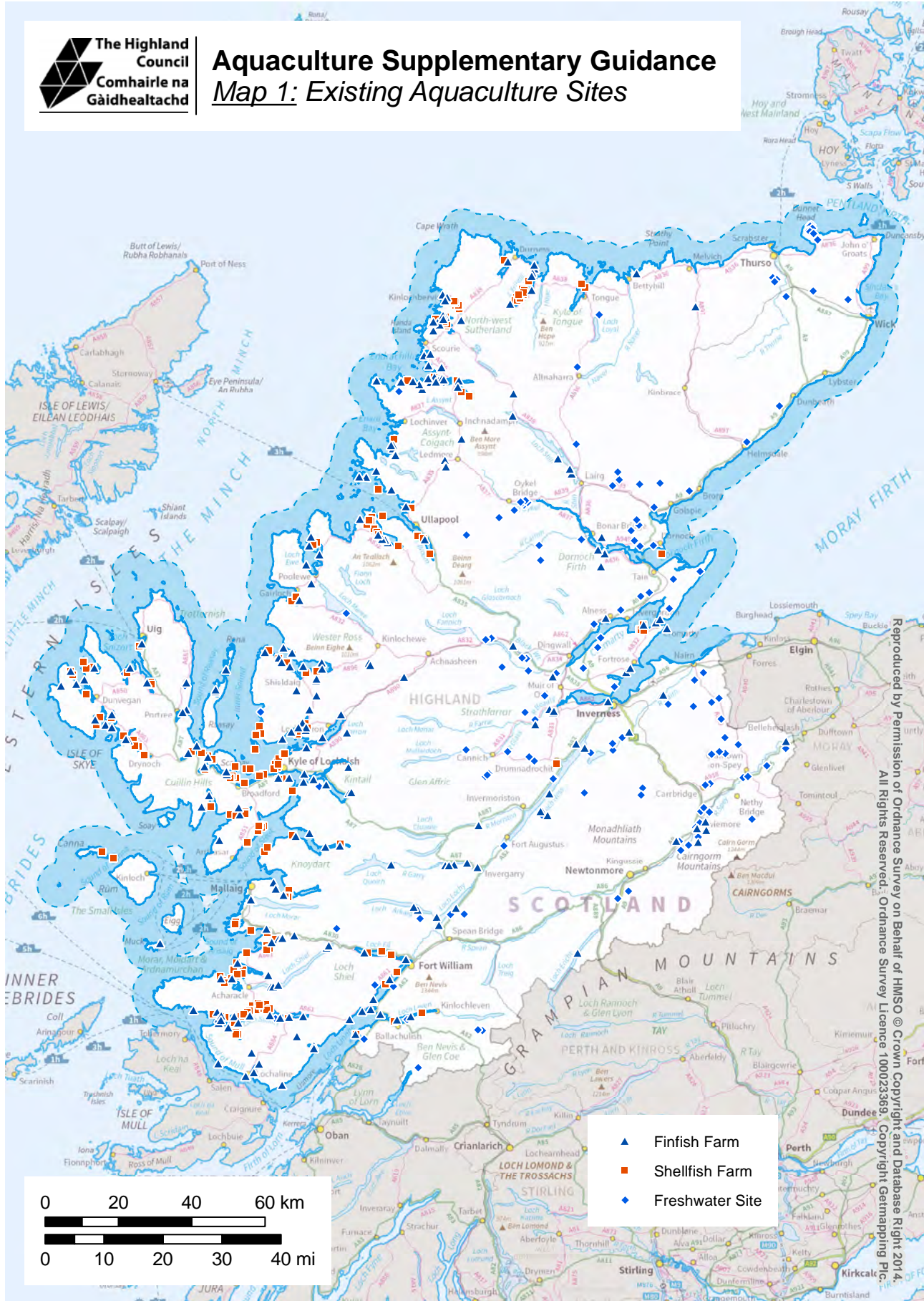
The following areas have the potential to be affected by aquaculture development and may therefore be considered as constraints to development:

- Special Protection Areas
- Special Areas of Conservation
- Ramsar sites
- Marine Protected Areas
- National Scenic Areas
- Sites of Special Scientific Interest
- Geological Conservation Review Sites
- Special Landscape Areas
- Wild Land
- Shellfish Water Protected Areas
- Seal Haul-out sites
- Scheduled Monuments
- Conservation areas
- Designated war graves
- Ancient Woodlands
- Carbon rich soils/Peat/Peatland habitats
- Ferry and shipping routes
- Admiralty Charted Anchorages
- Clyde Cruising Club Anchorages
- Harbours
- Marine cables, outfalls and pipelines

In addition, the following maps show spatial information for some of the sensitivities listed above and additional considerations. Aquaculture proposals will be required to demonstrate these potential sensitivities have been satisfactorily addressed in accordance with the Development Criteria.

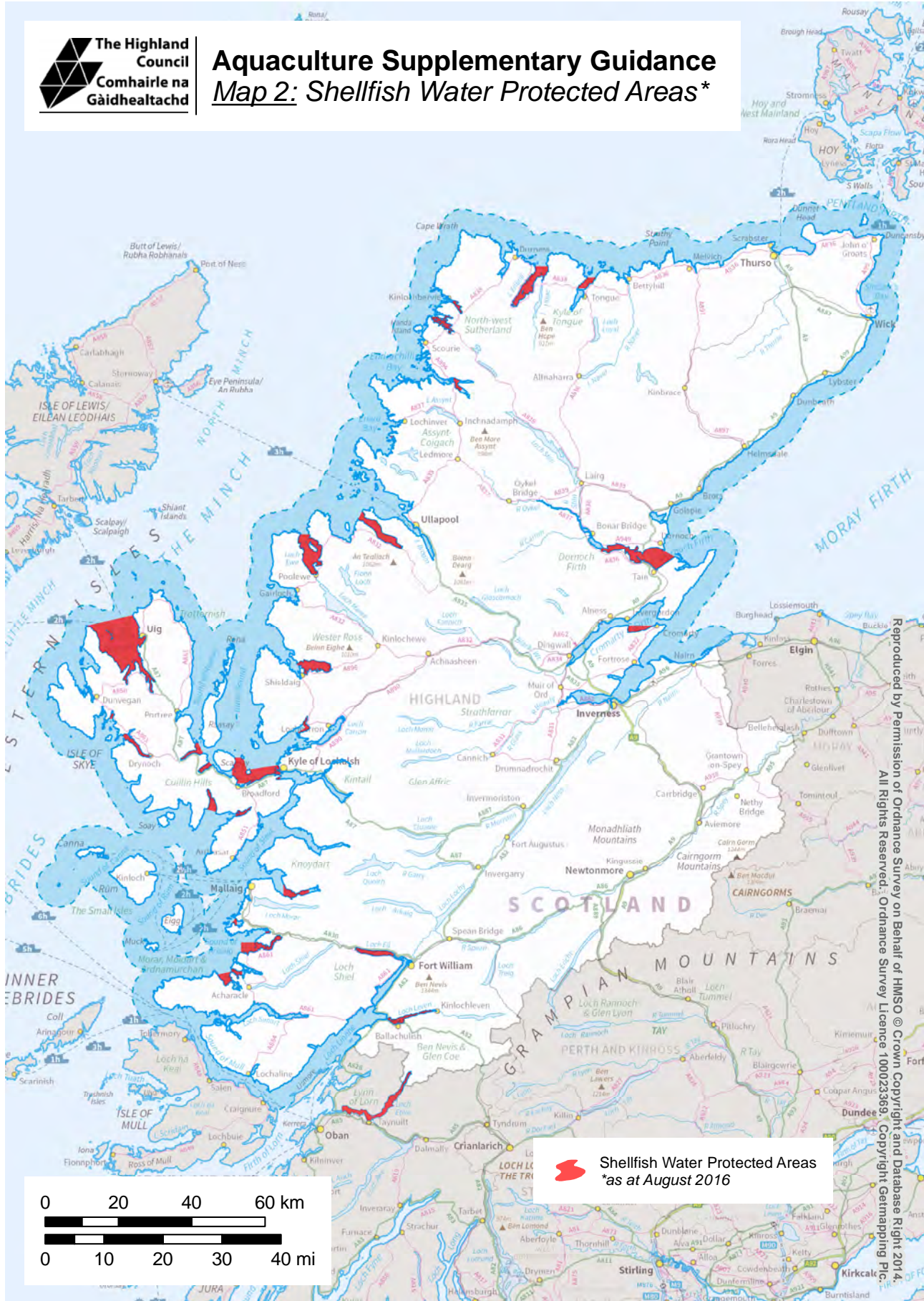


Aquaculture Supplementary Guidance
Map 1: Existing Aquaculture Sites



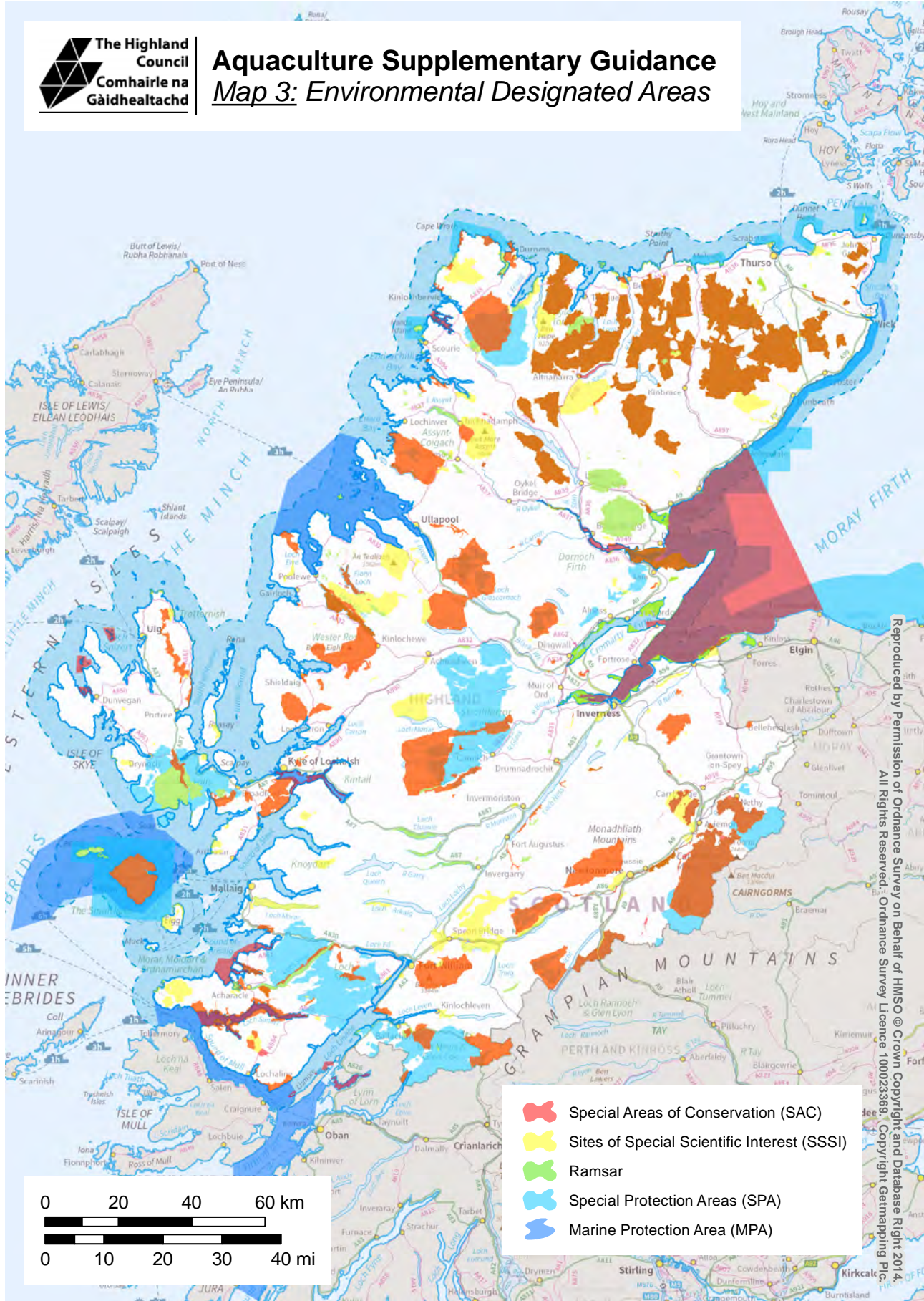
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2 Spatial Strategy





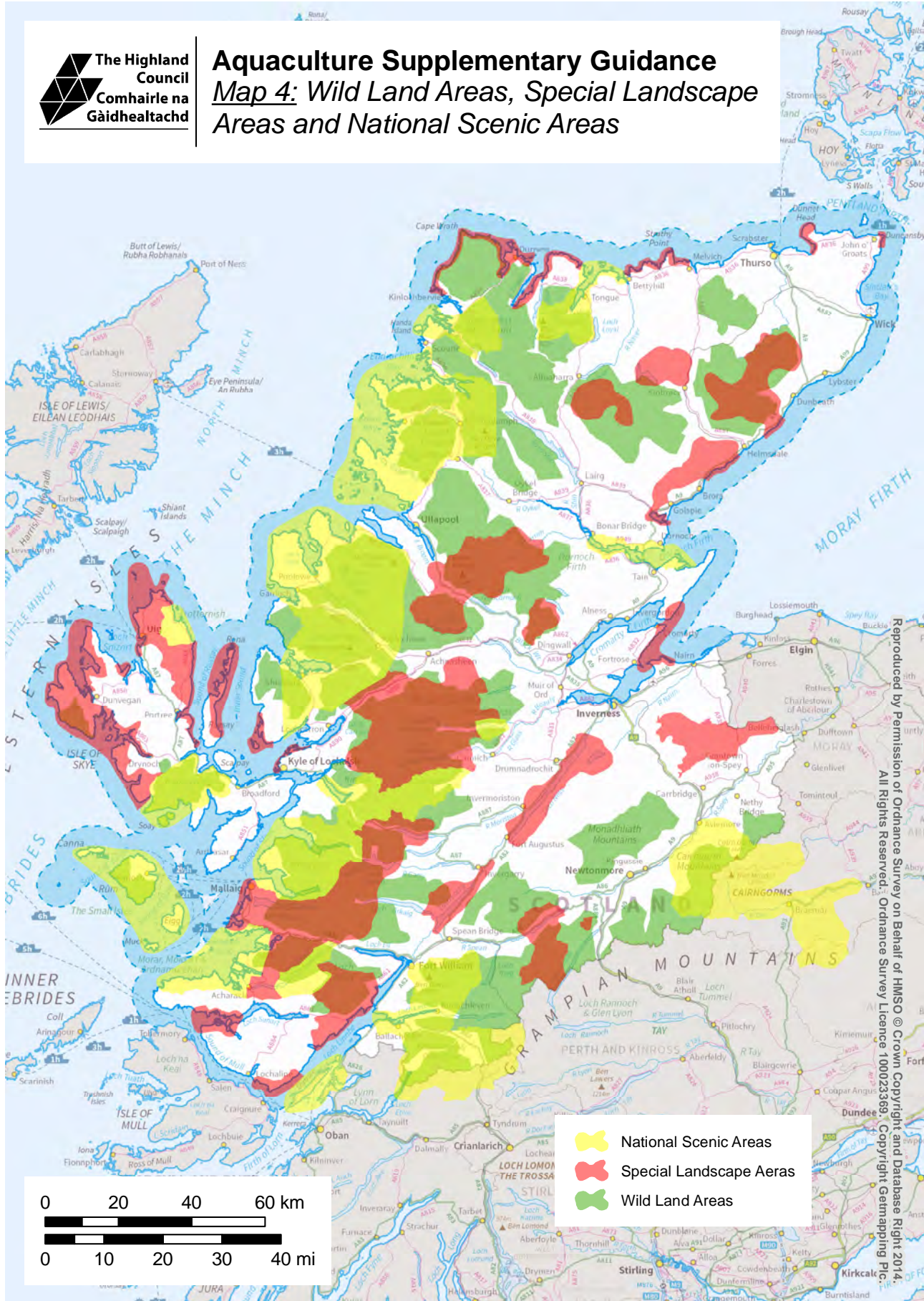
Aquaculture Supplementary Guidance
Map 3: Environmental Designated Areas



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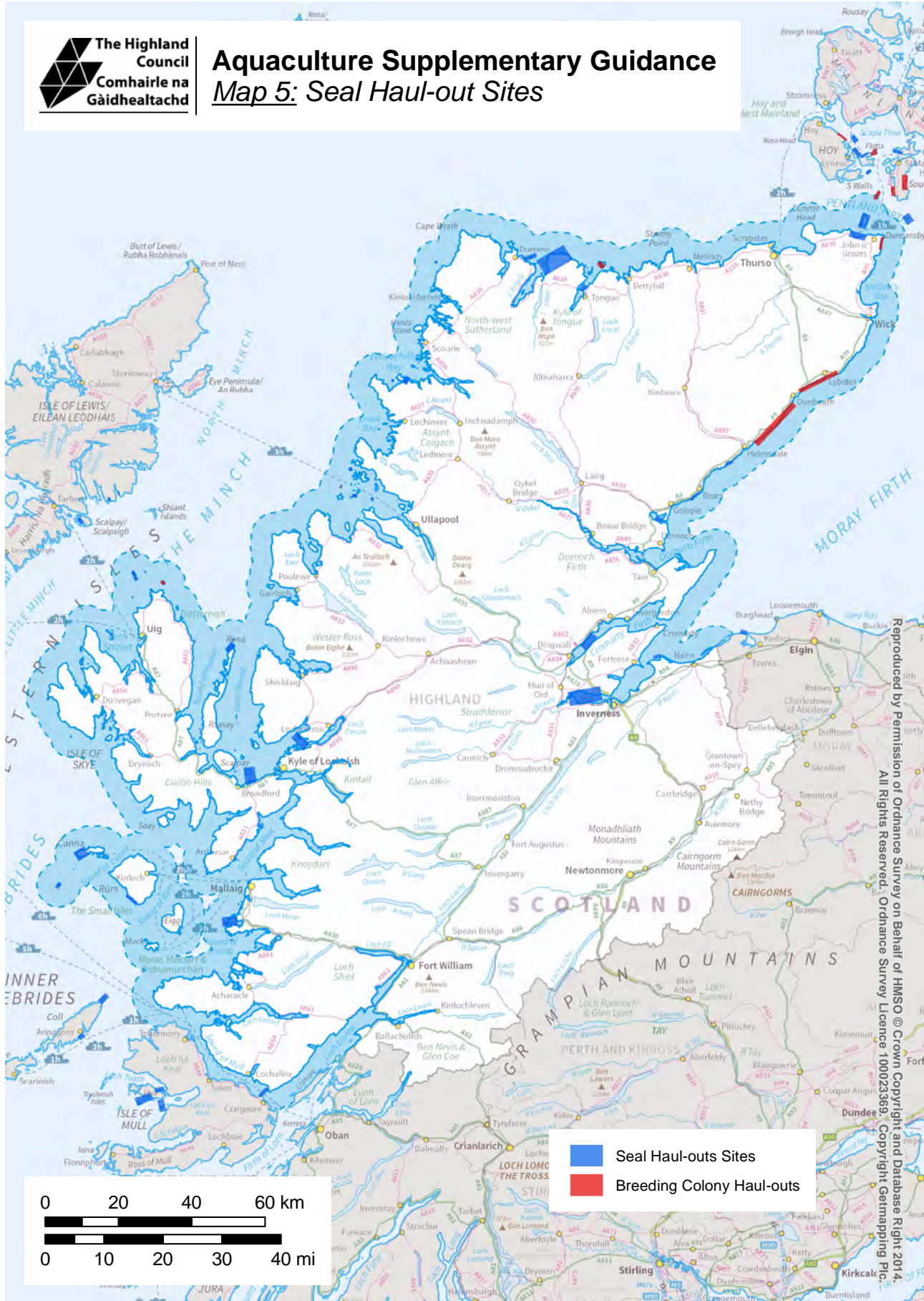


Aquaculture Supplementary Guidance
Map 4: Wild Land Areas, Special Landscape Areas and National Scenic Areas





Aquaculture Supplementary Guidance
Map 5: Seal Haul-out Sites



2 Spatial Strategy



Development Plan Considerations

3.1 All proposals for aquaculture development in Highland marine and freshwater environments will be assessed against the spatial strategy and the following interlinked Development Criteria provided in this section, as listed in Table 3. Each development criterion below has supporting text that outlines the various topics covered, followed by the criteria boxes.

Table 3 Development Criteria

Number	Criterion
DC1	Landscape/Seascape
DC2	Historic Environment
DC3	Biodiversity
DC4	Water Quality
DC5	Other Marine Users
DC6	Construction, Operation and Decommissioning

3 Development Criteria

Development Criterion 1: Landscape/Seascape, Siting and Design

Topics covered:

- **Landscape**
- **Seascape**
- **Siting and Design**
- **Wild Land/Unspoiled Coast**
- **Amenity**

3.2 Aquaculture installations are established features of the Highland coastline. Most of the active sites are located within sheltered sea lochs or in the lee of small islands. In some instances a relatively high concentration of developments can have a significant impact, particularly in constrained lochs and bays. Finfish development has moved from relatively compact sites made up of rafts of square cages towards plastic circular cages which are tending towards significantly larger sizes. With increasing farm size and cage infrastructure comes the need for the larger feed barges which have appeared in recent years. Such installations can dominate some landscapes, impacting the amenity value of an area. Generally, mussel sites have a much lower impact on the landscape and/or seascape compared to finfish farming due to the low-profile equipment used. Oyster sites currently tend to be located in the intertidal zone where large areas of trestles are visible for less than half of the tidal cycle.

3.3 New aquaculture development should not dominate the landscape setting or become the main feature in views. Proposals should not materially impact on the overall quality of the landscape. Material impact includes a change to the established landscape or seascape pattern that significantly affects its general understanding or enjoyment.

3.4 The Highland Council area has 15 National Scenic Areas that are designated for their outstanding scenery, representing some of Scotland's finest landscapes. All but two have a coastal and/or marine element, where seascape is also a consideration. There are 27 Special Landscape Areas, which are features of local or regional importance identified by the Council as being large scale areas of regional importance for scenic quality or as small scale areas of local scenic and recreational value (see Appendix 2 of the HwLDP). There are also numerous areas of Wild Land. Freshwater aquaculture proposals may also have landscape considerations. Out with these designed sites (see Maps 3-5), there may be greater scope for the environment to accommodate development. However, there may still be local sensitivity arising from the characteristics and visibility of a particular site, which has to be addressed in landscape terms.

3.5 The siting, layout and design of aquaculture proposals should reflect the character of the surrounding landscape. Developments should take into account the effects on visual amenity. As per the SNH guidance (Table 1 & Section 4), they should follow the dominant line of the coast and should avoid filling up a bay or its entrance. Where the siting is appropriate, the scale and design of the equipment configuration, including the materials and colour schemes used, should ensure that the proposed development will be absorbed into the landscape/seascape with minimal intrusion.

3.6 A competent Landscape and Visual Impact Assessment, either as a stand alone document or as part of an Environmental Statement (see para 1.17), is the best way for applicants to address the above issues. The assessment should consider the likely impact from significant receptor points,

3 Development Criteria

including popular public viewpoints, transport routes, the core path network, visitor locations and historic sites. Guidance from the Planning Authority, including viewpoints for photomontages, on key sites and aspects to be considered, will be given at the pre-application advice stage and at the scoping stage, if relevant. The cumulative impacts with existing aquaculture and other maritime developments and activities should also be considered.

3.7 The coasts around Highland are famous world-wide for their quality landscapes, tranquil glens and intimate lochs. To help further protect the most important of these areas, a number of 'Wild Land Areas' have been identified (see Map 4) and further information is available on the SNH website. The National Planning Framework recognises wild land as a nationally important asset, and indicates Scotland's wildest landscapes merit strong protection. Wild land is also identified as nationally important in Scottish Planning Policy, but is not a statutory designation. In addition, Highland has many areas of largely unspoilt coast that are generally unsuitable for development. Aquaculture development must therefore be able to demonstrate that any significant effects on the qualities and amenity value of these areas can be avoided by appropriate location or substantially overcome by sensitive siting, design or other mitigation.

3.8 Highland currently has eleven prime beaches with excellent water quality, as recommended by the Marine Conservation Society. These beaches meet higher standards than those required under the revised Bathing Water Directive (2006/7/EC), which was enacted in Scotland by the Bathing Waters (Scotland) Regulations 2008, as monitored by SEPA. Most of these high quality beaches are located on the north and east coasts, with only one on the west coast, namely Achmelvich beach. In addition, there are many other beaches that are of significant tourism and recreational value in Highland. Potential impacts on any beach should therefore be considered by aquaculture development proposals, where appropriate.

3.9 As the west coast of Highland contains a number of relatively constrained lochs, this limits the landscape (and the biological) the carrying capacity for the number of sustainable aquaculture developments it can reasonably contain. Proposals for new aquaculture sites will therefore have to consider the proximity to existing aquaculture sites.

3 Development Criteria

DC 1.1

Landscape, Seascape, Siting and Design

Proposals for aquaculture developments with the potential to have adverse effect on landscape, seascape or visual amenity should be accompanied by a Landscape and Visual Impact Assessment (LVIA). This should be produced in accordance with current best practise and guidance e.g. the Landscape Institute 'Guidelines for Landscape and Visual Impact Assessment'.

Aquaculture developments that are assessed as likely to have a significant adverse impact, including cumulative impact, on the Highland landscape, seascape or visual amenity that cannot be mitigated to the satisfaction of the Planning Authority will not be permitted.

Development proposals should also ensure that:

- the character of areas of wild land is safeguarded;
- the character of unspoiled sections of coast is safeguarded.
- The impact on 'Views over open Water' are considered where developments are close to residential properties, roads and heritage and amenity features.

Developers should seek pre-application advice from the Council and, if appropriate, Scottish Natural Heritage, to inform decisions relating to siting and design and the scope and content of any LVIA. This may be done as part of an Environmental Statement for finfish sites where appropriate, or independently for shellfish sites. Visualisations should be prepared in accordance with Highland Council '*Visualisation Standards for Wind Energy Developments*'.

Development Criterion 2: Historic Environment

Topics covered:

- **Historic Environment**
- **Historic Marine Protected Areas**

3.10 Highland's historic environment makes a valuable contribution to the distinctive character of the area, the sense of place, identity and quality of life. As well as fulfilling a vital role in showcasing the vibrancy of Highland culture, the historic environment is a key economic driver. Historic environment assets currently include designations such as Conservation Areas, Battlefields, Gardens and Designed Landscapes, over 3,000 listed buildings, 1,236 scheduled monuments and a further 52,000 historic buildings, structures and archaeological sites.

3.11 To help preserve these valuable and irreplaceable assets, the Highland Historic Environment Strategy Supplementary Guidance defines the Council's approach to the protection of the historic environment through the planning process. The guidance is supported by the Historic Environment Record (HER) that provides details and maps of all recorded historic environment assets. The HER is not, however, a definitive or comprehensive record; it is continually updated as new sites and information comes to the attention of the Council.

3.12 The Marine (Scotland) Act 2010 established a new power to designate Historic Marine Protected Areas. Under these powers, seven MPAs are currently designated, four of which are in Highland. The Highland MPAs currently covers vessels that were wrecked around 1590 to 1690. The wrecks are a key link to understanding historic ship design and use, and may additionally contain artefacts that do not survive on land and that can offer valuable insights to our understanding of the past.

3.13 The terrestrial, coastal and marine historic environment should be a consideration in any Landscape and Visual Impact Assessment and/or Environmental Impact Assessment. The assessment should include the impacts of a development on all historic environment assets, whether designated or undesignated. It should include wrecks, sites, deposits, buildings and both submerged and terrestrial archaeological landscapes, as well as their setting. Some sites, such as designated features and protected war graves, may require additional assessments on potential sedimentary or biological changes that the developments may have.

3 Development Criteria

DC 2.1

Historic Environment

All aquaculture planning applications shall consider potential direct, indirect and cumulative impacts on the historic environment.

Applicants will be required to identify and undertake any mitigation measures required to avoid, reduce or minimize any adverse impacts on the historic environment to the satisfaction of the Planning Authority.

The special characteristics and qualities of Historic Marine Protected Areas shall be safeguarded.

Aquaculture development will not be permitted in locations where it would have a significant adverse effect on historic environment resources.

Development Criterion 3: Biodiversity

Topics covered:

- **Environmental Designated Areas**
- **Protected Species**
- **Appropriate Assessment**
- **Seals**
- **Wild Salmonids**
- **Sea Lice**

3.14 The term 'biodiversity' covers all living things and their habitat, along with their genetic variation. The Highland area is rich in marine habitats and species that collectively make up diverse biological communities. The east coast is dominated by sea cliffs in the far north-east and low-lying firths over much of the rest. The north and north-west coasts are mainly sea cliffs with some narrow sea lochs. The west coast is a mix of relatively narrow sea lochs and sheltered bays. Each coast offers varying opportunities for aquaculture development.

3.15 Along with all other public bodies, the Planning Authority has a duty to further the conservation of biodiversity under the Nature Conservation (Scotland) Act 2004 when exercising its functions. The Wildlife and Natural Environment (Scotland) Act 2011 requires public bodies to prepare and publish a biodiversity report on their compliance with the biodiversity duty. Whilst some marine species, such as many seabirds, have varying levels of protection under the Wildlife & Countryside Act 1981, some are so endangered they require special protection. In effect, these acts mean the planning authority must consider biodiversity out with designated habitats and species, including any onshore related impacts of aquaculture.

3.16 A key mechanism for protecting biodiversity (see Maps 3-5) is the use of designated areas for habitats and species under the Habitats and Birds Directives (see para 1.19 & Box 3). These are protected Natura 2000 areas and the associated flora and fauna represent the most valuable and vulnerable habitats and species in an international and/or national context (see Map 3). In addition, the first qualitative descriptor in the Marine Strategy Framework Directive (see Box 4) requires that biological diversity in maintained. Marine Protected Areas (see Box 5) will also play an important role in helping to safeguard marine biodiversity, whilst Sites of Special Scientific Interest (SSSIs) are also essential building block of Scotland's protected areas for nature conservation.

3 Development Criteria

Box 4

Marine Strategy Framework Directive

Fundamental aims of the MSFD are to:

- ensure that priority should be given to achieving or maintaining Good Environmental Status (GES) in the EU Community's marine environment;
- to continuing its protection and preservation and;
- to prevent subsequent deterioration.

This will be done through adherence to targets, for which 'descriptors' of GES have been established; these descriptors also cover other topics such as pollution and litter, which are covered elsewhere in this document.

Box 5

Highland Nature Conservation Marine Protected Areas (MPAs)

The Scottish Marine Nature Conservation Strategy (2011) explains the approach that was taken to develop a coherent network of nature conservation Marine Protected Areas. These designated sites will protect biodiversity and geodiversity but may still allow multiple uses of low impact activities that do no damage the ecological integrity of the sites. The MPAs in Highland are shown on Map 3.

The Planning Authority must notify Scottish Ministers if it believes that there may be a significant risk of hindering the stated conservation objectives of a Nature Conservation MPA.

3.17 Species protected under the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) legislation are generally known as European Protected Species (EPS). Of particular relevance to the marine environment, all cetacean (whale and dolphin) species, as well as other EPS present such as otter, are given protection under this legislation (see Box 3 for information on Natura sites). Other species such as grey and harbour seals also have legal protection. As these are all mobile species, particular care is required when any aquaculture development may impact on their migratory routes or key feeding or calving areas, as the animals are unlikely to be present all year round. Particular care is therefore required at the initial site selection stage. A licence is required from Marine Scotland if the animals are likely to be injured or disturbed by aquaculture activities. Other protected species may require a licence from SNH to allow activities to proceed that would otherwise be an offence.

3.18 Other species may also be protected under different legislation; guidance is available on the SNH website⁽⁵⁾. Some protected species of diving birds such as eider ducks may pose a threat to mussel sites by stripping the mussels off longlines. Detailed information on the deterrent measures or other types of mitigation proposed should be supplied with an application where such predation is likely to be an issue. The Planning Authority will be advised by Scottish Natural Heritage and Marine Scotland in relation to potential effects on protected species. SEPA will also provide information on the potential impacts on the seabed communities, also known as the benthic habitat, some of which require protection or mitigation measures.

3.19 The Marine (Scotland) Act 2010 makes specific provision for the conservation of seals. However, to protect the health and welfare of farmed fish, the Scottish Ministers may grant a licence authorising the killing or taking of seals. Should a development be likely to require a licence, this aspect should be covered as part of the predator control section of an Environmental Statement.

3.20 The degree of impact that an aquaculture development will have on biodiversity will depend on the scale and type of development. Mussel sites generally have a much lower impact on biodiversity compared to finfish farming due to the limited operational input required. Pacific oyster (*Crassostrea gigas*), a non-native species, forms the bulk of oyster species cultivated. Finfish developments have the greatest potential to have negative impacts on biodiversity due to the volumes, methods of farming and inputs required. Some elements of these aspects are governed by other agencies, as discussed in para 1.30, but are taken into account during the planning process.

DC 3.1

Designated Habitats and Species

Development or activities will not be permitted that would be likely to have an adverse effect, either individually or cumulatively, on the integrity of Natura 2000 or Ramsar sites.

Development or activities likely to have an adverse effect on the integrity of a Natura 2000 or Ramsar site, not directly connected with or necessary to the conservation management of the site, would be subject to an Appropriate Assessment in order to assess the implications for the site's conservation objectives.

In addition, aquaculture development will only be permitted where there is no significant adverse effect on:

- Protected species
- Priority Marine Features
- Sites of Special Scientific Interest.

Development and activities should consider the impacts on wider biodiversity interests both within and out with designated habitats and species and ensure these are minimised through appropriate design and mitigation.

⁵ <http://www.snh.gov.uk/protecting-scotlands-nature/protected-species/which-and-how/>

3 Development Criteria

To the satisfaction of the Planning Authority, planning applications must be supported by an assessment of the likely impact and the potential mitigation measures. Species and habitat surveys may also be required to accompany the application.

Where the level of impacts on protected areas, habitats or species remain uncertain but there are scientific grounds for believing that significant adverse impacts could occur, the Precautionary Principle will apply.

3.21 Salmon and trout are key species of our Highland rivers and coastal waters. An objective of the National Marine Plan is to maintain healthy salmon (and diadromous fish) stocks. This therefore requires effective management of both marine and freshwater i.e. an integrated approach. In the freshwater environment, some rivers are designated as a Special Area of Conservation (SAC) to protect salmon in the freshwater part of its life cycle. To complement this, both salmon and trout are now designated as Priority Marine Features for the marine part of their life cycle.

Box 6

Trout (*Salmo trutta*)

The sea trout is a brown trout that migrates to the sea for a part of its life cycle, returning to freshwater burns to spawn. During its sea phase, it tends to transit close to the shore.

Sea trout is a Priority Species in the UK Biodiversity Action Plan list, the Scottish Biodiversity List and is a Priority Marine Feature.

Box 7

Priority Marine Features

Priority Marine Features (PMFs) are species and habitats which have been identified as being of conservation importance to Scotland. Most are a subset of species and habitats identified on national, UK or international lists. Where planned developments or use have the potential to impact PMFs, mitigation, including alternative locations, should be considered. Actions should be taken to enhance the status of PMFs where appropriate.

3.22 During their migrations from freshwater to the sea and their return, wild salmon and trout tend to stay relatively close to shore. In constrained sea lochs along the west Highland coast, their route can take them very close to finfish farms. Studies have shown (e.g. see Youngson *et al*, 2001; Costello, 2009; Franklin *et al*, 2012; Murray and Hall, 2014; Pert *et al*, 20014; Adams *et al*, 2015 and references therein) that this may result in:

- Higher than background levels of sea lice and potential disease impacts on wild fish from fish farms;

3 Development Criteria

- Genetic dilution of wild stock from interbreeding of escaped salmon from the fish farms (including freshwater sites);
- Impacts on fresh water pearl mussels.

3.23 Sea lice occur naturally in wild fish populations. Where the sea lice encounter a fin fish farm, the population of lice can increase dramatically due to the intensive nature of finfish farming. These inflated lice numbers in turn can re-infect wild populations, including wild salmonids, compromising individual infected fish and potentially have wider population-level impacts. Sea lice management, along with escapes, remain significant challenges for the long term sustainability of the industry.⁽⁶⁾

3.24 Whilst Marine Scotland has various control measures for sea lice, these mainly relate to the farmed fish. In addition, SEPA places limits on the use of sea lice medicines. Patterns of treatment of sea lice infestations, as reported to SEPA in terms of sea lice chemical use, would suggest that the current methods of sea lice control are not always effective at all sites in terms of keeping sea lice infestations at fish farms under control⁽⁷⁾. Consideration therefore of impacts of aquaculture development on wild salmonids is a material consideration for the Local Authority at the planning stage. This is done, in consultation with statutory consultees, to ensure the Planning Authority's biodiversity duty is upheld through compliance with the relevant policies of its Development Plan. Consequently, this issue needs to be addressed by the applicant in any fin fish application to identify the likely effect on wild salmonids, on an individual and cumulative site basis and to suggest potential mitigation measures. Applications should be accompanied by a site specific Sea lice Management Plan aimed specifically at limiting infestation of wild salmonids with sea lice emanating from the fish farm. Where the Planning Authority is of the view there may be a likely significant effect on wild salmonids due to elevated levels of sea lice emanating from a fish farm development, it will secure the Sea lice Management Plan by planning condition to ensure its enforceability.

3.25 Such Sea lice Management Plans should include the following;

- A statistical methodology for calculating the average sea lice count per fish on a weekly basis,
- An upper threshold figure for average sea lice count per fish and a methodology for its calculation with reference to the infestation potential of wild salmonids in the area,
- A detailed description of measures to be used to maintain infestation levels at below the upper threshold figure and how they are to be implemented and monitored for effectiveness,
- An emergency action plan to be implemented if the threshold figure is breached.

6 (Marine Scotland, 2014)

7 (SEPA, 2015: consultation response)

3 Development Criteria

3.26 Sea lice infestation appears to be a dynamic issue ⁽⁸⁾, where new information, research results and management practises are in a state of ongoing development and improvement. For example, Marine Scotland is undertaking a project on aquaculture that includes consideration of the spatial constraints of aquaculture in relation to wild salmonids, which was due to report in March 2015. This information will be considered once it becomes available.

3.27 Fish farming businesses located within a farm management area must be party to a farm management agreement or prepare and maintain a farm management statement ⁽⁹⁾ These may be prepared in collaboration with fish farming companies, owners of significant rivers and other relevant wild salmonid interests.

DC 3.2

Wild Salmonids and Sea Lice

Aquaculture development will only be permitted where:

- there is no significant adverse impact on wild salmonid populations;
- cumulative impacts on wild salmonids have been assessed and mitigated where appropriate.

Where appropriate, mitigation measures to be followed in relation to the management of sea lice and their potential impacts on biodiversity must be contained within an environmental management plan to be submitted in support of the planning application.

8 (see MSS guidance:<http://www.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/Aqint>)

9 (<http://www.legislation.gov.uk/asp/2013/7/contents>)

Development Criterion 4: Water Quality

Topics covered:

- **Water Quality**
- **Benthic impacts**

3.28 Aquaculture development and activities rely on high water quality. Finfish cages have the potential to impact the water column and seabed (benthic impact) from the discharge of treatment chemicals, waste feed, feed treated with anti-seallice chemicals and fish faeces, which in turn can have biodiversity impacts (see DC3.1). Aquaculture development therefore requires a degree of tidal flushing to disperse waste materials and provide plankton for shellfish developments. Under the River Basin Management Planning (RBMP) Process, the status of freshwater, transitional and coastal water-bodies is assessed and monitored against a range of criteria. The aim is for all water-bodies to reach good ecological status within a specified timeframe.

Box 8

Good Ecological Status

The Water Framework Directive (WFD) aims to achieve 'Good Ecological Status' for all waters from Mean High Water Springs out to three nautical miles by 2015. The Directive was transposed into Scottish law by the Water Environment and Water Services (Scotland) Act 2003.

3.29 The RBMP process is managed by SEPA, which provides datasheets for all water bodies. These set out the status and identified pressures within that water-body that will adversely impact on water quality. Measures are suggested that can help mitigate, remove or reduce those pressures. In determining planning applications for aquaculture developments in both the Marine and Freshwater Environment, the Council will have regard to the RBMP status of the receiving water body and whether or not proposed development will result in increased pressures on it.

3.30 When alterations or extensions to an existing fin fish farm would increase the biomass or extend the equipment used, additional information would be required by both the Planning Authority and SEPA to ensure benthic habitats and water quality are not adversely impacted. Evidence would be required to assure SEPA that additional impacts would be within acceptable limits before it can recommend the Planning Authority to approve an application. The impacts would be assessed on an individual site basis, as well as on a cumulative basis, across the water body, and will take into consideration the spatial standards as detailed in the Scotland River Basin District (Standards) Directions 2014.

3.31 Many Highland fin fish farms make use of well boats for the treatment of fish for seallice or disease. Where these activities require discharges from the boat, a Marine Scotland licence is required (see Table 1).

3.32 SEPA guidance suggests that new shellfish development should be located within what are now known as 'shellfish water protected areas' (SWPA) (see Map 2). The boundaries of these may be updated by Scottish Ministers as required; developers should consult with them to ensure

3 Development Criteria

they have the latest information. However, for applications which propose to develop out with these areas, SEPA advises that any existing or new proposed sewerage discharges into the water body would not have to comply with SEPA's microbiological policy, which is why they generally advise that new shellfish farms should be located within SWPAs. Applicants should therefore be aware that any current or future Scottish Water and private sewerage discharges in the vicinity, and the potential for diffuse run-off from animals grazing the the surrounding area, could contribute to the potential for input of coliforms into the water body which may subsequently affect the classification of shellfish grown there. Whether or not shellfish are likely to be marketable is a commercial risk. SEPA has a duty to prevent deterioration of water quality in designated SWPAs and, where necessary, aim to improve shellfish water quality status to good, as part of the River Basin Management Plan Programmes. These new regulations mean that SEPA will continue to monitor these waters against the standards for sewage related bacteria set out in the Regulations, to ensure that discharges to the water environment will not adversely impact on the SWPAs. These areas are ultimately protected to ensure good quality products that are safe for human consumption, as regulated by Food Standards Scotland.

DC 4.1

Water Quality

Proposals for new marine finfish farming development and/or extensions to existing sites will not be permitted in locations where they would have a significant adverse impact on water quality.

Where appropriate, proposals will require to be accompanied with modelling and calculations that demonstrate that the benthic and water column impacts are localised and within environmental limits.

The impacts would be assessed on an individual site basis, as well as on a cumulative basis, across the water body, and will take into consideration the spatial standards as detailed in the Scotland River Basin District (Standards) Directions 2014.

Development Criterion 5: Other marine users

Topics covered:

- **Inshore fishing**
- **Recreational users**
- **Navigation**

3.33 Development in the marine environment has increased significantly in the last few decades. This has driven the need to a more formalized approach to resource utilization in the form of marine spatial planning. Any proposal for aquaculture development in the coastal area therefore has to consider a wide range of other marine activities and resource use and vice versa (see Table 4). These activities may have an economic, environmental and social impact both in the sea and on neighbouring land.

3.34 Many Highland marine activities make significant contributions to the local economy and support fragile, remote communities. These include fishing, ports and harbours, renewable energy, recreation and leisure.

3.35 The various types of inshore fishing in particular has a long history around the Highland coast and can be one of the main competitors for space with aquaculture. Whilst acknowledging the data limitations, information from the Scotmap projects suggests this pressure may be particularly found along areas off the west coast and off north-west Skye. This project targeted Scottish registered commercial fishing vessels under 15 meters. The data were collected during face-to-face interviews with individual vessel owners and operators and relate to fishing activity for the period 2007 to 2011.

3.36 Coastal tourism supports a variety of related business such as wildlife tour boats, sailing, accommodation, cafes and restaurants^{(10) (11)}. Further detailed information about each of these sectors will be available once the various Regional Marine Plans are developed by the Regional Marine Partnerships, as proposed by Scottish Government under the Marine (Scotland) Act 2010.

10 Awakening the Giant: [www.ryascotland.org.uk/Awakening the Giant.pdf](http://www.ryascotland.org.uk/Awakening%20the%20Giant.pdf)

11 Scottish Marine Recreation & Tourism Survey 2015

<http://www.gov.scot/Topics/marine/seamanagement/national/RecandTourism>

3 Development Criteria

Table 4 Examples of other marine users and potential interactions with aquaculture development.

User/Activity	Potential Interactions ⁽¹⁾	
	Finfish	Shellfish
Creel fishing	<p>May compete for space, leading to perceived displacement and socio-economic impacts.</p> <p>Potential to fish within fish farm moorings</p> <p>Detritus from fish farms may have localised effects.</p> <p>Creels may impact on navigation to fish farm sites.</p>	<p>May compete for space, leading to perceived displacement and socio-economic impacts.</p>
Existing aquaculture	<p>Use of shared infrastructure e.g. piers</p> <p>May compete for space. Adequate separation distances between other finfish sites are required to reduce potential for disease and infection transmission.</p>	<p>Use of shared infrastructure e.g. Piers.</p> <p>May compete for space.</p>
Marine renewable energy developments	<p>Negligible at present but may change as offshore wind, wave and tidal schemes develop. May be opportunities for synergistic benefits.</p>	<p>Negligible at present but may change as offshore wind, wave and tidal schemes develop. May be opportunities for synergistic benefits.</p>
Marine cable routes and pipelines	<p>Cable and pipeline routes may affect existing or new fin fish sites but effects likely to be restricted to installation stages.</p>	<p>Negligible at present but may change as offshore wind, wave and tidal schemes develop. May be opportunities for synergistic benefits.</p>
Yachting/Pleasure craft	<p>Poorly sited developments may encroach on or take over natural anchorages or impede navigation.</p>	<p>Poorly sited developments may encroach on or take over natural anchorages or impede navigation.</p>
Recognised dive sites	<p>Opportunity for shared access to piers. Acoustic Deterrent Devices (ADDs) may impacts on divers' enjoyment of a site.</p>	<p>Lines or trestles close to shore may impede access.</p>

1. A detailed assessment of interacting factors would be undertaken on a case-by-case basis: this list provides examples only.

DC 5.1

Other Marine Users**

Aquaculture development will only be permitted where, in the view of the Planning Authority:

- there is no significant adverse impact on other marine users;
- existing fisheries have been considered and where appropriate, effects mitigated.

Developers should consult with the relevant harbour authority and Marine Scotland at an early stage in the planning process to consider any potential navigation and shipping issues, where appropriate. Details of such considerations should be provided in any subsequent planning application.

Developers should consult with local fisheries interests at an early stage where there is evidence of fishing activity in the area of the proposed development.

Development will not be permitted where there would be adverse effects on the amenity value of anchorages and harbours, including their approaches, where they would be compromised.

Where appropriate, opportunities for shared use of jetties, piers and harbours should be considered.

Access to the foreshore for recreational activities, recognised yacht anchorages and dive sites should not be impeded.

**Note: given the large geographic size of Highland, it is impracticable to map the variety of existing users. However, where local information is available, the Planning Authority will aim to provide this information at the pre-application stage. The Planning Authority would expect developers to take a common sense approach to identifying other key marine users likely to be affected, or affect, their development proposals and discuss appropriate mitigation in submitted applications.

3 Development Criteria

Development Criterion 6: Construction, Operational & Decommissioning Impacts

Topics covered:

- **Equipment**
- **Amenity**
- **Access**
- **Waste**
- **Light**
- **Noise**
- **Predator Control**
- **Decommissioning**

3.37 As well as impacts on biodiversity (see DC3.1), aquaculture developments have the potential to impact on neighbouring users, wider biodiversity and the landscape. The trend for finfish developments to use increasingly larger cages and feed barges and for more extensive mussel and oyster farms has led to increased visual and amenity pressures. Additional or extended aquaculture sites also increases the amount of boat traffic and other operational issues.

3.38 To help reduce such impacts, mitigation measures may be required. Developers may therefore be required to provide information on issues such as visual impact, light, noise and odour mitigation measures in support of their applications. At the earliest possible stage in the project design process, applicants should consider the following issues:

1. **Equipment**

Poor choice of colour or design of equipment can have a significant impact on the surrounding landscape or seascape. The height of some equipment can make it more difficult to assimilate in the landscape and seascape therefore low-profile designs are generally preferable. With the growing trend for the finfish farming equipment used to be larger, e.g. 400T feed-barges and higher top-nets, additional mitigation may be required. Whilst there may be a drive within the industry for standardized equipment, a 'one size fits all' approach is not appropriate in some areas of Highland. All aquaculture equipment should fit with Sustainable Design policy (No. 28) in the HwLDP. Equipment, other than navigational markers, should be in muted, matt colours that to blend into the surroundings. Where other colouration would be more appropriate, written permission should be obtained in advance from the Planning Authority.

2. **Amenity**

The amenity value of an area can be impacted by aquaculture activities that introduce new structures that are unsympathetic to the surroundings or existing pattern of use. Amenity value can be defined as natural or physical qualities and characteristics of an area that contribute to people's appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes. Including an assessment of the amenity impacts within the application may be particularly helpful in proposals for new developments or significant amendments to existing sites.

3. **Access**

Particularly where developments are proposed in remote areas and road access is required, developers may be required to undertake an access assessment. Where operations require access to the intertidal zone e.g. tractors and trailers used for oyster harvesting, an assessment of the impact on other users of common access may be required. Harbours, piers, jetties and

pontoons are key access points for both aquaculture and many other marine activities, allowing opportunities for shared use, subject to appropriate bio-security measures.

4. **Waste**

Waste from aquaculture has the potential to harm wildlife, cause unsightly litter, particularly in otherwise relatively pristine areas or become an obstruction or navigation hazard.

Development proposals should include information on how waste will be dealt with and a commitment to minimize waste in all aspects of the site's operation. Storm-damaged equipment that has broken free from its moorings or abandoned equipment can also be a hazard to navigation, people and wildlife. Recovery and proper disposal of such equipment is therefore important.

5. **Light**

Above surface lighting on feed-barges and cage systems, along with underwater lighting, can cause light pollution and additional visual impact, particularly in remote sealochs where the sense of naturalness and isolation is a key tourist draw. It also has the potential to impact on the faunal communities, other than the farmed fish, present in the water ecosystem by altering a variety of biological processes. Consequently, the authority is likely to control the extent and duration of lighting through planning conditions and applicants should indicate their lighting requirements in detail in any application.

6. **Noise and Odour**

Operational noise caused by equipment such as generators, feed-blowers and harvesting boats or other mechanised equipment working outwith normal working hours have the potential to affect nearby people, particularly in closely confined loch systems or areas where there is normally little background noise. Noise assessment and potential mitigation measures should be provided where such equipment is to be used. Details of any odour mitigation measures should also be provided.

7. **Predator Control**

Some species may be attracted to the concentrations of fish or shellfish at an aquaculture sites, which can have a significant impact on the operation of the site. In order to enable the determination of site-specific risks, where appropriate, the developer will be required to provide information on the proposed predator management measures. This is likely to include the presence and abundance of species that might be at risk from any proposed anti-predator methods. In particular, the site specific impacts of Acoustic Deterrent Devices would require careful consideration on cetaceans and seals.

8. **Decommissioning**

Once a site, or any associated onshore infrastructure, is no longer required for aquaculture production it may be decommissioned. In most instances, appropriate conditions are attached to a planning consent to ensure timely removal of equipment and adequate restoration of a site.

3.39 To help mitigate some of the potential impacts discussed above, finfish and shellfish developers, should as a minimum, comply with their respective Code of Good Practice. Whilst these provide standards of practice and a framework for industry development, they do not replace or remove any of the planning requirements outlined in this planning guidance.

3 Development Criteria

DC 6.1

Construction, Operation & Decommissioning

All aquaculture development proposals should ensure that any potential significant adverse effects, including cumulative impacts, due to equipment design, colour, amenity, access, lighting, noise, odour, predator control or site closure are appropriately mitigated to the satisfaction of the Planning Authority.

Where appropriate, planning applications should be supported by a predator management strategy.

With regard to all planning permissions granted pursuant to this policy, if any site is not operational for a continuous period exceeding three years, all equipment and waste must be removed from the site to the satisfaction of the Planning Authority.

4 Additional Sources of Information

Note: the council is not responsible for external websites, which are subject to change.

References

- 4.1 Adams, T.P., Proud, R. and Black, K.D. (2015) Connected networks of sea lice populations: dynamics and implications for control. *Aquaculture Environment Interactions*, **6**, 273-284.
- 4.2 Costello, M.J. (2009) How sea lice from salmon farms may cause wild salmonid declines in Europe and North America and be a threat to fishes elsewhere. *Proceedings of the Royal Society B*, **276**, 3385-3394.
- 4.3 Food Standards Scotland 2015
<http://www.foodstandards.gov.scot/food-safety-standards/advice-business-and-industry/shellfish>
- 4.4 Franklin, P., Verspoor, E. and Slaski, R. (2012) Impacts of open pen freshwater aquaculture production of wild fisheries. The Scottish Government, Edinburgh.
- 4.5 Marine Scotland (2014) MGSA Science & Research Working Group: Aquaculture Science & Research Strategy. The Scottish Government, Edinburgh.
- 4.6 Marine Scotland Science (2014a) Scottish Fish Farm Production Survey 2013
- 4.7 Marine Scotland Science (2015) Scottish Shellfish Farm Production Survey 2014
- 4.8 Murray, A.G. and Hall, M. (2014) Treatment rates for sea lice of Scottish inshore marine salmon farms depend on local (sea loch) farmed salmon biomass and oceanography. *Aquaculture Environment Interactions*, **5**, 117-125.
- 4.9 Pert *et al* (2014) Using sentinel cages to estimate infestation pressure on salmonids from sea lice in Loch Shieldaig, Scotland. *Aquaculture Environment Interactions*, **5**, 49-59.
- 4.10 Scottish Government (2013) Aquaculture and Fisheries (Scotland) Act 2013
<http://www.legislation.gov.uk/asp/2013/7/contents>
- 4.11 Scottish Government (2015)
<http://www.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/Aqint>
- 4.12 SEPA (2015) Consultation response
- 4.13 Youngson, Dosdat, Saroglia and Jordan (2001) Genetic interactions between marine finfish species in European aquaculture and wild conspecifics. *Journal of Applied Ichthyology*, **17**, 153-162.

The Highland Council

Application Form & Guidance

http://www.highland.gov.uk/info/1225/countryside_farming_and_wildlife/62

4 Additional Sources of Information

/fisheries_and_aquaculture

Pre-application advice

http://www.highland.gov.uk/info/180/planning_-_applications_warrants_and_certificates/187/when_to_get_planning_permission/4

Major Application guidance (for site equipment > 2.0 ha)

http://www.highland.gov.uk/info/180/planning_-_applications_warrants_and_certificates/143/planning_permission

Highland wide Local Development Plan

http://www.highland.gov.uk/info/178/local_and_statutory_development_plans/199/highland-wide_local_development_plan

Supplementary Guidance

http://www.highland.gov.uk/info/178/local_and_statutory_development_plans/213/supplementary_guidance

Special Landscape Areas

http://www.highland.gov.uk/downloads/file/2937/assessment_of_highland_special_landscape_areas

Cultural heritage sites

<http://her.highland.gov.uk/>

Highland Historic Environment Strategy

http://www.highland.gov.uk/info/178/local_and_statutory_development_plans/213/supplementary_guidance/19

Aquaculture Framework Plans

http://www.highland.gov.uk/info/1225/countryside_farming_and_wildlife/62/fisheries_and_aquaculture/6

Highland Coastal Development Strategy

http://www.highland.gov.uk/downloads/file/1062/highland_coastal_development_strategy

Enforcement Charter

http://www.highland.gov.uk/downloads/download/203/planning_enforcement_charter

4 Additional Sources of Information

SNH

Natura sites

<http://www.snh.gov.uk/protecting-scotlands-nature/protected-areas/international-designations/natura-sites/>

Habitats Regulations Appraisal (Appropriate Assessments)

<http://www.snh.gov.uk/protecting-scotlands-nature/protected-areas/international-designations/natura-sites/habitats-regulations/>

MPA guidance

[http://www.snh.gov.uk/protecting-scotlands-nature/protected-areas/national-designations/marine-protected-areas-\(mpa\)/](http://www.snh.gov.uk/protecting-scotlands-nature/protected-areas/national-designations/marine-protected-areas-(mpa)/)

Site and Design guidance

<http://www.snh.gov.uk/publications-data-and-research/publications/search-the-catalogue/publication-detail/?id=113>

Landscape and Aquaculture guidance

<http://www.snh.gov.uk/protecting-scotlands-nature/looking-after-landscapes/landscape-policy-and-guidance/landscape-planning-and-development/landscape-and-aquaculture/>

Protected species

<http://www.snh.gov.uk/protecting-scotlands-nature/protected-species/>

General Guidance

<http://www.snh.gov.uk/publications-data-and-research/snhi-information-service/>

SEPA

CAR Regulations

http://www.sepa.org.uk/water/water_regulation.aspx

Modelling data

<http://www.sepa.org.uk/water/aquaculture/modelling/>

SEPA fish farm manual

http://www.sepa.org.uk/water/aquaculture/fish_farm_manual/

Marine Development and Marine Aquaculture Planning Guidance

<http://www.sepa.org.uk/media/143325/lups-gu17-marine-development-and-marine-aquaculture-planning-guidance.pdf>

4 Additional Sources of Information

Scottish Government

Permitted Development Rights

<http://www.scotland.gov.uk/Topics/marine/Fish-Shellfish/18716/fish-farm>

Shellfish water protected areas

<http://www.scotland.gov.uk/Topics/Environment/Water/15561/shellfishwaters>

Aquaculture and Fisheries (Scotland) Act 2013

<http://www.legislation.gov.uk/asp/2013/7/enacted>

Scottish Planning Policy (SPP)

<http://www.scotland.gov.uk/Publications/2014/06/5823>

A Fresh Start – the Renewed Framework for Scottish Aquaculture (2009)

http://www.google.co.uk/url?url=http://www.scotland.gov.uk/Resource/Doc/272866/0081461.pdf&rct=j&frm=1&q=&esrc=s&sa=U&ei=xnyVU5_CJYu7PZj4gNgl&ved=0CCEQFjAB&usg=AFQjCNFR4uuFrQDUAVMbB_y0rPL6wfX_Cw

Circular 1/2007 Planning Controls for Marine Fish Farming

<http://www.scotland.gov.uk/Publications/2007/03/29102026/1>

Locational Guidelines

<http://www.scotland.gov.uk/Topics/marine/Publications/publicationslatest/farmedfish/locationalfishfarms>

Running a fish farm

<http://www.scotland.gov.uk/Topics/marine/Fish-Shellfish/18716>

Marine Protected Areas

<http://www.scotland.gov.uk/Topics/marine/marine-environment/mpanetwork>

Historic Marine Protected Areas

<http://www.historic-scotland.gov.uk/index/heritage/wrecksites/scotlands-historic-wrecks.htm>

Marine (Scotland) Act 2010

http://www.oqps.gov.uk/legislation/acts/acts2010/pdf/asp_20100005_en.pdf

Environmental Impact Assessment (EIA) Regulations

<http://www.scotland.gov.uk/Topics/archive/National-Planning-Policy/themes/>

4 Additional Sources of Information

[enviro-assessment/eia](#)

National Planning Framework

<http://www.scotland.gov.uk/Topics/Built-Environment/planning/NPF3-SPP-Review/NPF3>

Working arrangement: Requirements of statutory consultees

www.scotland.gov.uk/Resource/Doc/295194/0106302.pdf

Review of DSFBs

<http://www.scotland.gov.uk/Topics/marine/Salmon-Trout-Coarse/fishreview>

Draft Planning Circular 'Planning Scotland's Seas: The relationship between the statutory land use planning system and marine planning and licensing'

www.scotland.gov.uk/Resource/0042/00428395.pdf

Scotmap

<http://www.scotland.gov.uk/Topics/marine/science/MSInteractive/Themes/ScotMap>

Seal haul-out sites

<http://www.scotland.gov.uk/Topics/marine/marine-environment/species/19887/20814/maps>

NMPi

<http://www.scotland.gov.uk/Topics/marine/seamanagement/nmpihome/nmpi>

Scotland's aquaculture

<http://aquaculture.scotland.gov.uk/>

The Wildlife and Natural Environment (Scotland) Act 2011

<http://www.legislation.gov.uk/asp/2011/6/contents/enacted>

Nature Conservation (Scotland) Act 2004

<http://www.legislation.gov.uk/asp/2004/6/contents>

The Town and Country Planning (Marine Fish Farming) (Scotland) Order 2007

<http://www.scotland.gov.uk/Publications/2007/03/29102026/7>

The Town and Country Planning (Scotland) Act 1997

<http://www.legislation.gov.uk/ukpga/1997/8/contents>

4 Additional Sources of Information

The Town and Country Planning (General Permitted Development) (Fish Farming) (Scotland) Amendment Order 2012

<http://www.legislation.gov.uk/ssi/2012/131/contents/made>

The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2011

<http://www.scotland.gov.uk/Publications/2011/06/01084419/0>

DSFB

Wild fisheries information

<http://www.asfb.org.uk/>

CEC

Seabed lease

<http://www.thecrownestate.co.uk/coastal/aquaculture/working-with-us/aquaculture-leases/>

SSPO

Code of Good Practice (including link to other relevant aquaculture legislation)

<http://www.thecodeofgoodpractice.co.uk/cogp/preface-to-the-2010-edition>

ASSG

Code of Good Practice

<http://assg.org.uk/#/code-of-practice/4536619829>

Miscellaneous

Minimising the impact of ducks on mussel farms.

www.gla.ac.uk/media/media_19794_en.pdf

Light pollution effects

<http://goo.gl/Eajcwt>

Marine Strategy Framework Directive

<http://www.msfd.eu/>



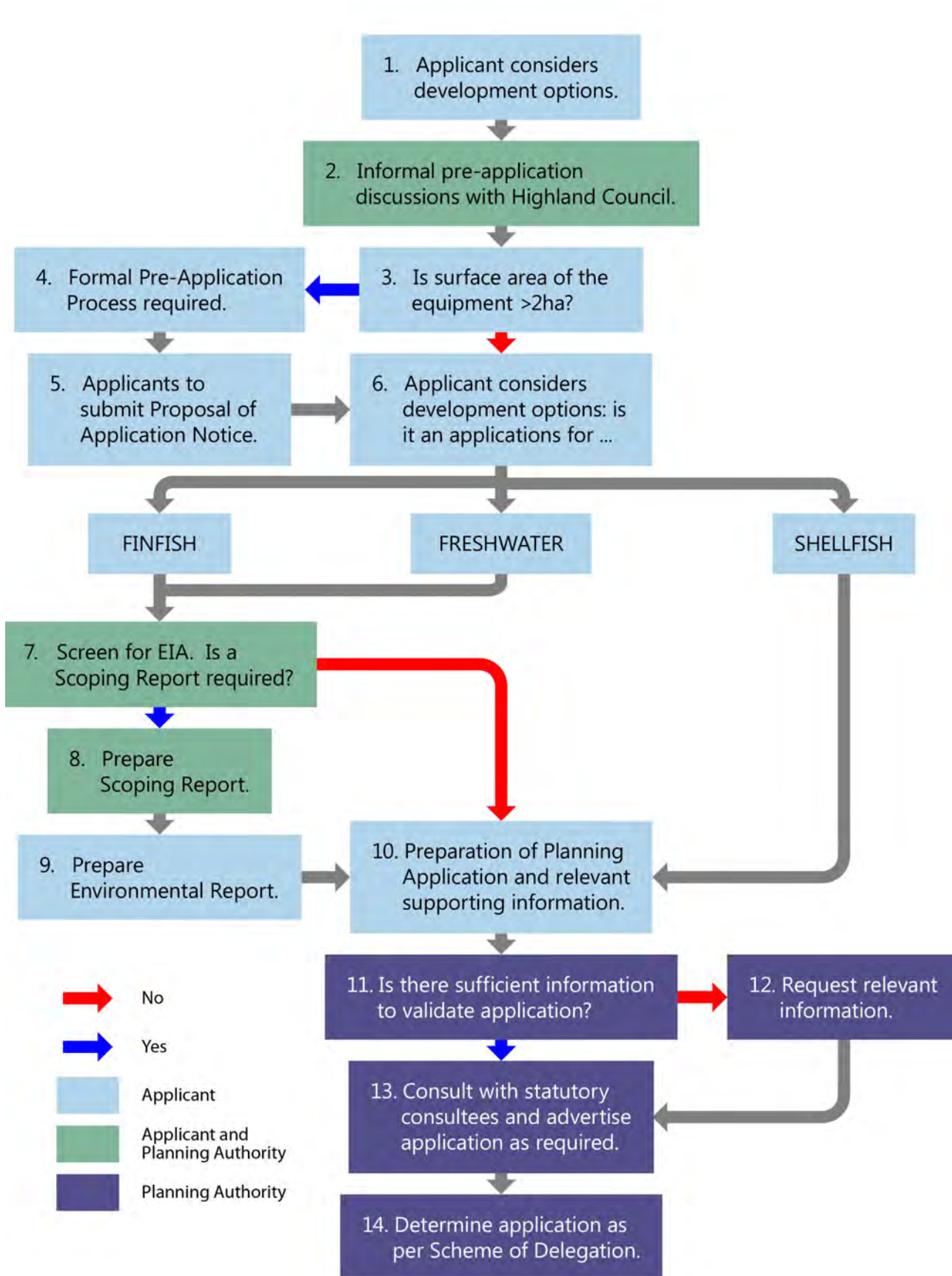
4 Additional Sources of Information

National Biodiversity Network

<http://www.nbn.org.uk/>

Annex 1: Diagram of aquaculture planning process

Figure 2





**The Highland
Council
Comhairle na
Gàidhealtachd**

1. Introduction

1.1 The aim of the Highland Council's draft Aquaculture Supplementary Guidance is to provide detailed guidance to support the policies within the Highland wide Local Development Plan (HwLDP), in particular the aquaculture policy. The consultation on the guidance ran from 25th May to 19th July 2015. This included two meetings hosted by the Council for aquaculture industry representatives and for other stakeholders respectively.

1.2 Thirty-four responses were received from 26 organisations and individuals (Annex 1). The comments are summarised in the tables below, in no order of priority, grouped by general comments then topic themes. Every comment has not been repeated verbatim; to see the comments in full, see www.highland.gov.uk/aquaSG .

The main points raised were:

- Concern regarding the status of the document as Supplementary Guidance.
- Some respondents from the aquaculture industry felt the tone of document appears to be negative.
- Elements of the Spatial Strategy are confusing.
- Greater clarification is required regarding the Development Criteria.

1.3 A number of suggestions for amendments received related to only one type of marine fish farming. However, some of these suggestions could not be applied as suggested, as they were not compatible with the other main farming type i.e. shellfish or finfish. For example, there is no restriction on shellfish farming on the north and east coasts so this area is available for further development, as it is for freshwater sites, but there is a presumption against further marine finfish farm developments on these coasts. Other suggestions were for wider changes beyond the remit of this guidance but this information regarding wider marine fish farming issues can be passed on to the relevant organisations.

1.4 The consultation process trialled a new on-line consultation software called 'Objective'. This required an initial registration process, which then allowed comments to be made on the various sections of the document. Most respondents however chose to use email supported by pdf documents. Lessons learned from this will allow the Council to refine subsequent consultations using this software.

Next Steps

1.5 The document and the supporting draft Environmental Report will now be revised in light of the comments received. The document will then be considered alongside the HwLDP review process currently underway, with the intention to adopt the guidance as Supplementary Guidance. Information about the review can be found at:

2. Summary of consultation points raised and action taken

Issue	General Comments
List of persons and organisations who submitted comments:	
RYA; Scottish Wildlife Trust; Marine Harvest Scotland Ltd.; SSPO; Scottish Water; Scottish Salmon Company; Scottish Sea Farms; Eileen Armstrong; Wester Ross Area Salmon Fishery Board; Scottish Salmon Think-Tank; Tawney Croft Wildlife Consultants	
Summary of the comments received:	
<ol style="list-style-type: none"> 1. Document is constructive, useful and well written. 2. The sector must be guided by the principles of sustainable development and an ecosystems approach. 3. Aquaculture development necessary to meet Scottish Government 2020 targets. 4. Concern how compatible SG is in relation to NMP, MS locational guidelines and future RMPs, PFOW and MSFD. 5. Terminology: 'opportunity' rather than 'growth' is the preferred wording in the NMP. 6. Aquaculture development should be located where it will not be impacted by Scottish Water's established activities and where it will not lead to future investment needs being place on Scottish Water. 7. Concern that overall tone throughout the document appears to be negative (examples provided) with duplication of effort re responsibilities of other regulatory organisations. 8. Concern regarding technical qualification of document as Supplementary Guidance; also it appears to be more policy than guidance. 9. Request much more detail on socio-economic benefits of aquaculture. 10. Welcome, in principle, the approach in preparing whole coastline guidance but has significant concerns regarding the detail. 11. Request that Statutory Consultees comments on planning applications are available ahead of deadline for public responses and other organisations added to list of Statutory Consultees. 12. No specific mention of freshwater pearl mussels. 13. No clear guidance on what constitutes a "significant adverse effect". 14. Unclear how MS licences for commercial activities that could cause disturbance to a European Protected Species will be taken into account during the planning process. 15. All aquaculture planning permissions should be time limited with enforceable conditions. 16. Concern over environmental protection versus sustainable development: the two do not mean the same thing. 17. General comments on typing and formatting mistakes. 18. Each section of the documents describes and accepts there are problems for marine habitats and species. 19. Document needs to discuss alternative mitigation in the form of closed containment fish farming techniques. 	

Recommended Council response and action regarding comments received:

1., 2.; 6.; 10.; 16.: Noted

3. In the NMP and various other documents, Scottish Ministers highlights productions targets for fin fish and shellfish targets. It is our understanding that these targets are derived from aspirational figures developed by the industry and have not, as far as we are

4. The planning guidance is compatible with the documents listed other than RMPs which do not yet exist for the three Highland Marine Regions.

5. SPP is the key reference document for guiding development under the T&CPA, which appears to favour the term 'growth'.

7.; 17. Noted – text amendments made throughout the document.

8. Document to be presented as Supplementary Guidance in line with the revised HwLDP process.

9. Some more detail to be added and updated; current coverage appears to be on a par with all other Scottish Local Authority guidance on aquaculture.

11. It is not possible within the confines of target timescales to ensure that in every case the Statutory Consultees are available to the public ahead of the public advertisement of the application. Such assurances could only be made subject to changes in the determination timescales for applications. These are set out in the planning acts and are therefore beyond the scope of this document.

12. Specific mention of Freshwater Pearl Mussel has been added to the biodiversity criteria section.

13. Terminology as per EU Directive 2011/92/EU (as amended by Directive 2014/52/EU)

14. All advice provided by statutory consultees will be taken into account.

15. The presumption in the planning acts is that planning permissions should be permanent. The Planning Authority retains the right to impose a time limit on a planning permission and this will be considered on a case by case basis along with other relevant conditions.

Issue	Introduction
List of persons and organisations who submitted comments:	
Grieg Seafood Ltd; Scottish Wildlife Trust; Marine Harvest Scotland Ltd; ASSG; SSPO; Scottish Water; Scottish Salmon Company; Scottish Sea Farms; Wester Ross Area Salmon Fishery Board; Scottish Government; Scottish Salmon Think-Tank; Tawney Croft Wildlife Consultants	
Summary of the comments received:	
<ol style="list-style-type: none"> 1. Development necessary to meet Scottish Government production targets. 2. Figure 1 should be updated to reflect some documents now published. 3. Concern over perceived negative tone of document. 4. Concern over status of document as SG and associated wording. 5. More detail on socio-economic value of aquaculture industry required. 6. More detail request re operational requirements. 7. Social significance of shellfish aquaculture and climate change issues should be covered. 8. Clarification required re 'Aquaculture Strategy' and Appropriate Assessment requirements. 9. Insufficient detail re Marine Planning Partnerships and role of Local Authority Environmental Health Officers. 10. Suggestion that species cultivated is not a material consideration. 11. Amendments and clarification required for Table 1 re roles and responsibilities. 12. Query re status of Policy 50 and consideration of Shellfish Water Protected Areas 13. Clarification required re planning zone for fish farming. 14. Clarification required re targets for growth not Scottish Government targets but industry targets. 15. Not clear how MS licensing decisions will be assessed and taken into account during the planning process. 16. Seaweed harvesting not covered in sufficient detail. 17. Suggestion that Figure 1 is amended to show waste and pollution control guidance. 18. Remit of document does not reflect the aspirations of environmentally sustainable aquaculture development. 	
Recommended Council response and action regarding comments received:	
<ol style="list-style-type: none"> 1.; 14. In the NMP and various other documents, Scottish Ministers highlights productions targets for fin fish and shellfish targets. It is our understanding that these targets are derived from aspirational figures developed by the industry and have not, as far as we are aware, had the benefit of any kind of sustainability appraisal. 2. Figure 1 will be updated accordingly. 3. Noted – text amendments made throughout the document. 4. Document to be presented as Supplementary Guidance along with revised HwLDP. 5. More detail to be added. 	

6. Detailed information on the operational requirements of marine fish farming not required in this document.

7. Noted.

8. Figure 1 amended to show aquaculture guidance rather than 'strategy'. Changes to procedures required for Appropriate Assessments out with the remit of this guidance and Highland Council; these changes could only be made by Scottish Ministers.

9. As no detail is yet available regarding the potential make up of the three Marine Planning Partnerships in Highland none can be given. Detail re Environmental Health Officers role is not part of the planning process.

10. Species cultivated is a material consideration as it determines, among other things, the biodiversity aspects and equipment types to be considered in the application.

11. Table 1 amended

12. Policy 50 is the existing policy in the HwLDP.

13.; 15. Text to be clarified.

16. If Scottish Government guidance available text will be updated regarding licencing or planning requirements.

17. Noted.

Issue	Spatial Strategy (SS)
List of persons and organisations who submitted comments:	
<p>Lochaber District Salmon Fishery Board; RYA; SNH; Scottish Wildlife Trust; Marine Harvest Scotland Ltd; ASSG; SSPO; Kyle of Sutherland District Salmon Fishery Board; Scottish Salmon Company; Scottish Sea Farms; Wester Ross Area Salmon Fishery Board; Scottish Government; Scottish Salmon Think-Tank; Wester Ross Fisheries Ltd.; Comhairle nan Eilean Siar</p>	
Summary of the comments received	
<ol style="list-style-type: none"> 1. Concern that Map 1 appears to show potential growth areas in Loch Linnhe and south Skye, particularly in relation to potential sealice and escapes impacts. 2. Map 1 poorly designed, confusing and misleading. 3. Map 1 should identify all waters around the Isle of Skye and Wester Ross as areas of potential sensitivity. 4. Need to add Clyde Cruising Club anchorages, Wild Land areas, Geological Conservation Review sites, ancient woodlands, carbon rich soils, peat and peatland habitats to Spatial Strategy. 5. Need clarification on spatial strategy; an area of sensitivity may still accommodate aquaculture. 6. All landscape needs consideration, not just designated landscapes. 7. Query re whether landscape is a material consideration out with designated areas. 8. Maps 1 & 7 appear contradictory; perhaps two separate opportunity/sensitivity maps: one for finfish and one for shellfish. 9. Limitations of spatial strategy: not all factors can be mapped or can be mapped in sufficient detail. 10. Need to clarify biodiversity protection is covered in more detail in HwLDP. 11. Request summary of Map 5 to be amended. 12. Local authority boundaries should be clearly defined. 13. Spatial Strategy gives impression of very few areas for development. 14. Need to clarify role of RMPs and consider status of NMP. 15. Clarify text in Table 2. 16. Query re site boundaries under Scottish Government Audit/Review/Order process. 17. More detail requested re Map 2 regarding types of aquaculture. 18. Map 2 needs updating to show all freshwater sites and show scaled circles to highlight consented biomass for finfish farms. 19. Map 3 should highlight higher protected status of Shellfish Water Protected Areas and supporting text clarified. 20. Map 4 does not identify Oykel and Evelix SACs and appear incorrect for the MPAs. 21. Map 5 should separate out Wild Land from statutory designations and further clarify status of Wild Land. 22. Maps 4 & 5 should not imply no potential sensitivity out with designated areas. 23. Clarification required on Marine Scotland Locational Guidelines. 24. Map 6 should include other seal haul-out sites. 25. Many of these designations do not prevent development within them but proposals may require additional consideration. 26. Concern that non-designated areas may be seen as potential areas of growth due 	

to lack of SNH data regarding species/habitats present.

Recommended Council response and action regarding comments received:

1.; 2.; 3. Map 1 only shows an overview of existing designated sites; there are many other issues to consider, as listed in the spatial strategy and the development criteria. Map 1 will be removed.

4.; 5.; 10.; 11.; 12.; 15.; 23.; 25. Text to be amended to reflect suggestions. Clarification will be provided to highlight that the maps and text to show planning considerations but do not state development cannot take place given appropriate consideration, and if necessary mitigation, of the designation or issue in question.

6.; 22. Clarification will be provided to highlight that all marine fish farming planning applications will be assessed on a case by case basis, so consideration by their nature differentiate the different types i.e. shellfish and fin fish farming developments.

7. SNH advice in it's 'Marine Aquaculture and the Landscape' guidance: "*the rich variety and distinctiveness of the character of all our landscapes is recognised as an important asset.*"

8. Map 7 highlights SPP policy on finfish, which does not exclude growth opportunities for shellfish development. Map 1 shows the north and east coasts as potential areas of development as they could accommodate shellfish growth; the finfish sector is well aware of the restrictions on these coasts.

9. Noted. Text to be updated to clarify this.

13.; 17.; 22. Noted

14. Further detail to be added.

16. Site areas are not defined for every farm consented by Scottish Ministers under s31A, particularly those farms covered by the 2011 Order.

18. Maps to be updated but scaling will not be shown.

19. Text to be further clarified re status of SWPA.

20. The scale of Map 1 & 4 are such that the Oykel and Evelix SACs do not show up, but are visible when on-line maps are viewed at an appropriate scale, as was highlighted in Section 2.3. MPA sites to be updated.

21. Noted. Text re Wild Land to be further clarified.

24. Whilst it is acknowledged that seals may haul out in many areas, the designated sites are determined by Scottish Ministers.

Issue	Landscape & Historic Environment
List of persons and organisations who submitted comments:	
<p>RYA; SNH; Greig Seafood Ltd.; Marine Harvest Scotland Ltd.; ASSG; SSPO; CEC; Scottish Salmon Company; Scottish Sea Farms; Eileen Armstrong; Scottish Government; Scottish Salmon Think-Tank; Wester Ross Fisheries Ltd.</p>	
Summary of the comments received:	
<ol style="list-style-type: none"> 1. Oyster farms not generally marked on Admiralty charts and can be a hazard for shallow draft craft. 2. Request DC1.1 and DC1.2 are merged and re-worded to include reference to SNH guidance. 3. Elements of DC1.1 and DC 2.1 read more as policy than information or guidance. 4. Request substandard LVIA's are not accepted. 5. Comparison of landscape impacts between finfish and shellfish developments irrelevant. 6. Suggestion DC1.3 is added to DC3 and clarified; appears to be new policy therefore not appropriate for supplementary guidance. 7. Less priority should be given to a standard separation distance and more should be given to the impact on perceptual experiences and visual amenity at site specific level. 8. Clarification requested re status of Wild Land and Isolated Coast and Views Over Open Water and SPP requirement for safeguarding of unspoilt coast. 9. Suggestion that as moored and temporary structures, no landscape legacy issues. 10. Concern re definition of 'wild land' and suggestion that any fish farm development should not be visible from wild land or core path. 11. Best way to protect historic harbours etc is to use them for their intended purpose. 12. Links to history do need to be preserved; also a necessity for progress; one does not necessarily detract from perceptual experience. 13. Request Historic Environment criteria removed. 14. Historic Environment section should remain. 15. Request the historic landscape of cleared villages and evidence of crofting practices added as a consideration. 16. Given wild land and unspoilt coast considerations, difficult to see where development would be encouraged. 	
Recommended Council response and action regarding comments received:	
<ol style="list-style-type: none"> 1. In determining applications the applicant is advised that it is their responsibility to advise the United Kingdom Hydrographic Office of the location of the site. Charts are updated via Notices to Mariners. 2. As Wild Land (and Unspoilt Coast, of which Wild Land may be a part of) are distinct categories but not statutory designations it is helpful to highlight their special qualities. Once further SNH individual wild land area guidance is available, this will be referenced. 3.; 5.; 10.; 11.; 12.; 13.; 14.;15.; 16 Noted. 	

4. Sub-standard LVIA's are not a valid reason to not validate any marine fish farming application received.

6.; 7. DC1.3 to be clarified.

8. Noted. Text to be further clarified.

9. As permanent planning permission is sought in the vast majority of cases, these structures are not considered as temporary. The use of an area for fish farming and the physical presence of an aquaculture installation is likely to be long-term and obvious, even if the equipment specification changes or the site is fallowed from time to time. In most cases the changes of equipment specification over time represents a gradual intensification of the use of the site. Scaling up is more the norm than scaling down.

Issue	Biodiversity & Water Quality
List of persons and organisations who submitted comments:	
<p>Lochaber District Salmon Fishery Board; RYA; SNH; Greig Seafood Ltd.; Marine Harvest Scotland Ltd.; ASSG; SSPO; CEC; Hebridean Whale & Dolphin Trust; Kyle of Sutherland District Salmon Fishery Board; Scottish Salmon Company; Scottish Sea Farms; Eileen Armstrong; Wester Ross Area Salmon Fishery Board; Scottish Government; Scottish Salmon Think-Tank; SEPA; Mallaig & North West Fishermen’s Association; Scottish Fishermen’s Federation; Wester Ross Fisheries Ltd.; Tawney Croft Wildlife Consultants</p>	
Summary of the comments received:	
<ol style="list-style-type: none"> 1. Information provided regarding impacts of sea lice on wild salmonids. 2. One of the attractions of Highland waters for RYA members is the marine wildlife. 3. Text clarification on status of various levels of protection required, roles of the various authorities and more reference made to SNH guidance and geodiversity. 4. SNH welcome and support DC3.2 and associated text. 5. Would like more referencing to modelling methods used when industry defining potential sites. 6. A map of important salmonid routes and rivers would be useful. 7. Clarification on roles of other agencies or cut down repetition, including requirement for multiple Appropriate Assessments. 8. Integrated Multi-Trophic Aquaculture could include seaweed therefore guidance needed re separation distances on case by case basis not single policy. 9. Clarify designation of SWPAs. 10. Clarify information re status of non-native oyster. 11. Elements of DC 3.1, 3.2 and DC 4.1 read more as policy than information or guidance. 12. Interaction between farmed fish, wild fish and sealice is complex. More information required re environmental management schemes for sealice. Suggest a reviewable plan or adaptive management. 13. Query how Environmental Management Schemes for sea lice will be applied in an area with more than one operator but is a more proactive approach than time-limiting planning applications. 14. Query rational for DC3.2 and supporting text. 15. Clarification required re levels of protection regarding seals and cetaceans. 16. Question need for elements of DC4.1 17. The effects of Acoustic Deterrent Devices and knowledge gaps outlined; request for developers to provide more information in EIAs. 18. Welcome inclusion of salmon and sea trout information but underplays the potential genetic risks to wild salmon populations posed by escapes from freshwater smolt production facilities. 19. Need to update section on Farm Management Agreements. 20. Need more information on how impacts on MPAs will be assessed. 21. Precautionary Principle must be strictly adhered to, where information on the status and potential impacts on species is unavailable. 22. Strongly support sections 3.22-3.27, especially time limited planning permissions and how these will be assessed. 	

23. How will significant adverse effect be proved re impact on wild salmonids?
24. Operators should be required to develop a monitoring plan to demonstrate that it is possible to recognise the impact of their operations upon protected species.
25. Concerns re CAR licence process and nutrient enrichment effects; clarification on roles required.
26. Suggestion that finfish farming should be done in closed containment; the potential and actual impacts of sea lice on wild salmonids routinely underplayed.
27. Seal haul-out sites are not adequately covered; there are many more than those mapped.
28. Potential and actual impacts of sea lice on wild salmonids are routinely underplayed. DC3.2 goes a long way to stating Highland Council's requirements for containing sea lice.
29. Current mitigation measures are totally inadequate and undesirable.
30. Concern re water quality impacts of aquaculture.
31. Request for additional text added re water quality assessments would be done on an individual site basis.
32. Very supportive of Local Authority considering impacts of sea lice on wild salmonids.
33. Emphasise that all available information needs to be taken into consideration when considering sealice infestations, including current and historical information.
34. Fish farms should be required to preserve marine features in the same way as commercial fishing vessels.
35. The 'flushing' described [para 3.29] would seem sensible but does not factor in the perception that finfish activities pollute the environment.
36. Guidance on Good Environmental Status under the Marine Strategy Framework Directive welcome.
37. DC4 strongly supported.
38. Scientific evidence should be highlighted to support sea lice section.
39. Further detail and strengthening of water quality section required.

Recommended Council response and action regarding comments received:

1. Noted. Section to be updated with references
- 2.; 4.; 11.; 14.; 16.; 17.; 21.; 24.; 26.; 28.; 29.; 31.; 33.; 34.; 35.; 36.; 38 Noted.
- 3.; 19. ; 30. Text to be clarified to reflect suggestions.
5. Operational issue for developers.
6. Reference to data on NMPi will be provided; whilst salmon rivers are no longer shown, they can be found here: <http://www.gov.scot/Publications/2011/03/21114728/29> .
7. Noted. Changes to procedures required for Appropriate Assessments out with the remit of this guidance and Highland Council.
8. Noted. An application intending to carry out ITMA would be applied for and considered as such. It is generally considered that by and large ITMA would involve the culture of multiple species within a single site footprint. An example in Highland is the culture of Sea urchins alongside salmon on a small number of sites. These involve only minimal additional equipment when compared to the salmon farm. The Siting of a shellfish farm in

close proximity to a fish farm is a different scenario in terms of the cumulative impact of sites in a given area.

9.; 10.; 15.; 20.; 25. Further clarification to be provided.

12.; 18.; 32.; 37. References and further clarification to be provided.

<http://www.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/Aqint>

13. The use of Environmental Management Schemes, or similar measures, will be assessed on a case-by-case basis.

23. Where a significant impact is likely but uncertain, the precautionary principle will be applied until such time as definitive evidence is available.

27. Whilst it is acknowledged that seals may haul out in many areas, the designated sites are determined by Scottish Ministers.

Issue	Other marine users and construction, operational & decommissioning
List of persons and organisations who submitted comments:	
<p>RYA; SNH; Grieg Seafood Ltd; Scottish Wildlife Trust; Marine Harvest Scotland Ltd.; ASSG; SSPO; sportscotland; Scottish Water; Scottish Salmon Company; Eileen Armstrong; Wester Ross Area Salmon Fishery Board; Scottish Salmon Think-Tank; Mallaig & North West Fishermen’s Association; Scottish Fishermen’s Federation; Wester Ross Fisheries Ltd.</p>	
Summary of the comments received:	
<ol style="list-style-type: none"> 1. Add reference re tourism study 2. Request that developers should consult RYA and West Highland Anchorages & Moorings Association at an early stage 3. Once sites not longer required all equipment should be removed. 4. Improved communication and collaboration is necessary. 5. Clarify consultation requirements with stakeholders. 6. Request that canoeing and kayaking added to section 7. Table 4: shellfish interactions should apply to marine renewables and cables. 8. Clarify if new policy intended re consulting fisheries interests. 9. Clarify status of advice from other regulators. 10. Request specific mention of ‘dive sites’ removed from DC5.1 11. Request more positive wording re status of Code of Good Practice. 12. Elements of DC5.1 and DC 6.1 read more as policy than information or guidance. 13. Clarification of roles required for Table 4 and it takes no account of biodiversity ‘users’. 14. Fish farm litter a concern. 15. Ongoing work on tourism and recreation should be considered once these data are available. 16. Should apply a Marine Planning Partnership approach to developing this guidance. 17. Should clarify that navigation issues are covered by MS-LOT. 18. SWPA should give a presumption in favour of shellfish cultivation; out with these areas the scale of SWPAs could be increased or new designations made, in line with the guidance in the NMP. 19. Clarity required on operation and use of a site as determined by a planning permission. 20. Scottish water does not anticipate future requirements to upgrade infrastructure or treatment facilities to accommodate new shellfish farming developments. 21. DC5.1 should not include navigation as it is covered by MS/NLB. 22. Other activities such as creel boats, kayakers and diving should not be impeded by aquaculture. 23. Fish farms should not be positioned within line of sight of residential properties. 24. The coastal waters of Scotland are a “shared resource” therefore a public asset. 25. Re predator control, Highland Council should consider whether wild fish that pass close to a fish farm might be predated upon. 26. Table 4 should include other examples of fishing types. 27. Reference should be made to NMPi. 28. Request that planners directly consult fishermen and strongly support DC5 regarding identification of any potential impacts and mitigation of existing fisheries. 29. Query over Local Authority role re equipment removal if not operational; sites can 	

be fallow for more than three years.

30. Request cross-reference to biodiversity and amend DC6.1 wording to include 'operational impacts' and clearer guidance on terrestrial elements of aquaculture.

Recommended Council response and action regarding comments received:

1. Reference added to section 4 re RYA tourism study
- 2.; 5.; 8. Text clarified re consultation requirements.
3. Removal of equipment and waste generally covered in planning application stage and through conditions as discussed in DC6.
- 4.; 12.; 13.; 14.; 15.; 16.; 18.; 20.; 22.; 23.; 24.; 25.; 28. Noted.
- 6.; 26. Section provides examples only; not all fishing types will be listed. Canoeing and kayaking are part of 'pleasure craft' section and 'recreational activities' listed in DC5.1.
7. Table 4 amended to reflect suggestions.
9. Text clarified re status of advice from regulators.
10. Diving is a legitimate recreational activity which enhances the public's understanding of the marine realm and promotes a responsible approach to management of marine wildlife. Good shore dive sites are relatively rare in Highland, despite its size, because there are few areas of deep water close to public roads in the region.
- 11.; 17.; 21 Noted. Text amended to reflect suggestions.
19. Text clarified re status of marine fish farming planning permissions.
27. This is covered in Section 1 of the document.
29. If a site is intended to be fallow for over three years we would expect that such intention for the site would have been stated in the planning application form.

Issue	SEA: draft Environmental Report
List of persons and organisations who submitted comments:	
RYA; SNH; Historic Scotland; SEPA; Scottish Government	
Summary of the comments received:	
<ol style="list-style-type: none"> 1. Mentions key sailing anchorages but should be recreational anchorages 2. Should have defined monitoring programme 3. Amended reference required re Protection of Wrecks Act 1973 4. Content with findings; clear and easy to follow 5. Amend wording re MS locational guidelines 6. Amend wording to reflect NMP re presumption against further marine finfish farm developments on the north and east coasts. 	
Recommended Council response and action regarding comments received:	
<ol style="list-style-type: none"> 1. Wording on anchorages amended to state 'recreational' but 'key' retained as anywhere could be deemed an anchorage and thus potentially unduly limit development. 2.; 3.; 5.; 6. Text amended to reflect suggestions 4. Noted. 	

Table of acronyms

ASSG	Association of Scottish Shellfish Growers
CAR	Controlled Activities Regulations
DC	Development Criteria
EIA	Environmental Impact Assessment
HwLDP	Highland wide Local Development Plan
MNWFA	Mallaig and North West Fishermen's Association
MPA	Marine Protection Area
MPP	Marine Planning Partnerships
MS	Marine Scotland
MSFD	Marine Strategy Framework Directive
MS-LOT	Marine Scotland Licencing and Operations Team
NLB	Northern Lighthouse Board
NMP	National Marine Plan
PFOW	Pentland Firth and Orkney Waters
RMP	Regional Marine Plan(s)
RYA	Royal Yachting Association
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SEPA	Scottish Environment Protection Agency
SNH	Scottish Natural Heritage
SPP	Scottish Planning Policy
SSPO	Scottish Salmon Producers' Organisation
SWPA	Shellfish Water Protected Area

Annex 1

List of respondents

Association of Scottish Shellfish Growers
Comhairle nan Eilean Siar
Crown Estate Commissioners
Eileen Armstrong
Grieg Seafood
Hebridean Whale and Dolphin Trust
Historic Scotland
Kyle District Salmon Fishery Board
Lochaber District Salmon Fishery Board
Mallaig and North West Fishermen's Association
Marine Harvest Scotland Ltd
Royal Yachting Association Scotland
Scottish Environment Protection Agency
Scottish Fishermen's Federation
Scottish Government
Scottish Natural Heritage
Scottish Salmon Company
Scottish Salmon Producers' Organisation
Scottish Salmon Think-Tank
Scottish Sea Farms
Scottish Water
Scottish Wildlife Trust
Sportscotland
Tawny Croft Wildlife Consultants
Wester Ross Area Salmon Fishery Board
Wester Ross Fisheries Ltd