



Overview

Salmon Scotland welcomes the opportunity to provide a submission to the Local Government, Housing and Planning Committee, on the revised draft NPF4. Salmon Scotland and individual member companies submitted a detailed sector consultation response to the initial draft of NPF4 in December 2021. Following the publication of the revised draft NPF4, we wish to highlight to committee members that we have some significant concerns over the policy content for aquaculture.

General

Support for Aquaculture:

The salmon sector is the largest of the aquaculture production sectors in Scotland. It contributes to £766 million GVA, directly employs 2,500 people and a further 10,000 people depend on the sector. The sector also plays a significant role benefitting communities in some of Scotland's most rural and remote areas.

Firstly, there is no mention of the forthcoming Aquaculture Vision, which is expected to be published by Marine Scotland early 2023.

Within Scottish Planning Policy (SPP paragraph 249) and NPF3 there was clear national support for aquaculture growth, however this has been downgraded in NPF4. There is a lack of support for the sustainable growth of aquaculture in the spatial strategy and policy intent especially in comparison to renewables, tourism and agricultural related activities.

Local Development Plans should support or facilitate the sustainable growth of aquaculture as per current Scottish Planning Policy. This provides a clearer direction from national government that it supports the sector's growth.

There is also a relatively disproportionate focus on the perceived environmental impacts of aquaculture and the requirement for operators to minimise any impacts.

Within Policy Intent, there is a requirement for aquaculture to operate with social licence. However, this is not a material consideration in a planning application. It is inappropriate that aquaculture is singled out in this way, where other sectors are not. Furthermore, our sector has longstanding support from within the communities where we operate and, voluntarily provide significant financial contributions through a number of community support initiatives. This should not be a policy outcome. Community benefits should be developed and delivered through collaboration and agreement between host communities and businesses, and not prescribed at a national level. The ongoing reform of the consenting process for aquaculture will address both of these points, however they should not be stated as policy principles.

There is reference made in the policy intent to aquaculture operating within environmental limits, however it would be clearer to have a reference as to who the expert opinion on environmental limit is, which previous Scottish Planning Policy included, but NPF4 does not.

We disagree with the presumption against development on the north and east coasts of mainland Scotland. There is insufficient evidence to support claims that farmed salmon are having a significant

detrimental impact on populations of wild salmonids in Scotland. The current planning requirements are such that the potential hazard to wild salmon is managed and mitigated for through EMPs. The fact that salmon populations are in decline in both coasts of Scotland, despite the lack of any presence of salmon farming on the east coast indicates that salmon farming is not a leading cause of decline of wild salmon populations in Scotland.

Comparison of Policy Principles

National Spatial Strategy for Scotland 2045 - Regional Spatial Priorities for the North and West Coast and Islands states that support needs to be given to agriculture and fishing industries and that there are substantial economic opportunities presented by the renewable energy sector. The same support for aquaculture as a key food production sector should also be made explicit.

Salmon Scotland

3rd Floor, Venue Studios, 21 Calton Road

Edinburgh, EH8 8DL

enquires@salmonscotland.co.uk

www.salmonscotland.co.uk