

Fisheries Management Scotland Consultation Response

Places, people and planning: A consultation on the future of the Scottish planning system



4 April 2017

Fisheries Management Scotland is the representative body for Scotland's network of District Salmon Fishery Boards, the River Tweed Commission and Rivers and Fisheries Trusts. Our members work to safeguard the interests of Scotland's valuable and iconic wild freshwater fisheries, by promoting and delivering best practice in fishery management. Conservation and management of Scotland's wild fish stocks and their natural habitats is essential. Our members monitor the health of our fish populations, fisheries and associated habitat and deliver actions to protect, conserve and enhance these natural resources. An analysis published in 2017 demonstrated of the economic benefits of Scotland's wild freshwater fisheries indicated around £135m of angler expenditure, 4,300 full-time equivalent jobs and £79.9m Gross Value Added (GVA) in 2014.

We have read the consultation document, but have elected not to respond to the specific questions as set out in the consultation, and instead offer the following comments.

1. We support the opening statement emphasising the importance of the environment in which we live work and play and the recognition that this has a major impact on our health, wellbeing, sense of identity and prosperity. This is recognised within the fisheries sector, with programmes such as Casting for Heroes¹ and Casting for Recovery² now well-established. We support the premise that planning is central to the delivery of such as aspiration, and we are therefore concerned that the consultation appears to have a limited recognition of the importance of the natural and freshwater environment.
2. We were disappointed that rivers, lochs and the water environment has so little mention in the document. Scotland's natural environment is a major selling point for Scotland, but this does not appear to have the weight that it should when decisions are taken relating to the built environment or other developments. Developers, planners and other decision should consider the landscape including rivers and watercourses as a positive part of the decision making and not as something which just needs to be assessed as an afterthought. We consider this aspect is not a high enough priority in the current system and the new proposals do not appear to address this.
3. It is unfortunate from the perspective of a national representative body that it difficult to see from the proposals how we can influence positively the aspirations of the consultation. Whilst we support the aspiration of community involvement in planning it is not clear how this would be managed to support other management regimes which must occur at the catchment scale. It is important that communities are given adequate information and guidance to allow them to understand such processes. We support the idea of regional plans and partnerships but again cannot see from the consultation how these would work in practice and how the necessary specialist knowledge would be incorporated.
4. The consultation does not mention how the planning system interacts with River Basin Management Plans, Flood Risk Management Plans or the prospect of a National Strategy for Wild Fisheries Management. It is not clear how these processes fit into the consultation process for local development plans or what part they play in the hierarchy of decision making. It is often left to DSFBs and Fisheries Trusts to object to a particular development to enforce such plans – we consider that this should be

¹ <http://www.helpforheroes.org.uk/news/2015/june/heroes-tackle-fly-fishing/>

² <http://www.castingforrecovery.org.uk/>

built-in to the pre-consultation process so that such legitimate concerns can be dealt with in a more positive manner.

5. Fisheries Management is not just about managing fish, it is about managing impacts, pressures and people to ensure that the environment on which the fish depend is optimal. In order to do this effectively, it is vital that the planning process fully considers the potential impacts on fish and fisheries, and the freshwater environment on which they depend. DSFBs and Fisheries Trusts have a vital role to play in the process, as often the specialist knowledge of fish and fisheries and in-depth knowledge of the specific catchments does not exist elsewhere. It is important, as part of the ongoing Wild Fisheries Reform process, that the planning process recognises this expertise and ensures that formal channels of consultation with DSFBs/ Fisheries Trusts are implemented. At the current time, DSFBs are statutory consultees for fish farming, but not for any other class of development. A wide range of developments have the potential to impact on fish and fisheries, including forestry operations, renewable energy, and those activities covered by the Controlled Activities Regulations.
6. The recognition of the lack of skills is a positive aspect of this consultation, but the consultation only makes reference to professional bodies relating to the built environment. We consider that this limits the positive influence that landscape and catchment planning might contribute and may limit the effectiveness of the changes proposed.
7. Fisheries Management Scotland works in partnership with both the public and private sector to deliver its aims, and we are keen to continue to develop this in future. We would welcome further discussion on how the specialist skills of our members can be brought into the process to deliver the aspiration of ensuring that the environment sustained and created for the people of Scotland to live, work and play is achieved.