



Association of Salmon Fishery Boards

Comments on the Review of the Scottish Planning Policy

January 2013

Introduction

The Association of Salmon Fishery Boards is the representative body for Scotland's 41 District Salmon Fishery Boards (DSFBs) including the River Tweed Commission (RTC), which have a statutory responsibility to protect and improve salmon and sea trout fisheries. The Association and Boards work to create the environment in which sustainable fisheries for salmon and sea trout can be enjoyed. Conservation of fish stocks, and the habitats on which they depend, is essential and many DSFB's operate riparian habitat enhancement schemes and have voluntarily adopted 'catch and release' practices, which in some cases are made mandatory by the introduction of Salmon Conservation Regulations. ASFB creates policies that seek where possible to protect wider biodiversity and our environment as well as enhancing the economic benefits for our rural economy that result from angling.

We welcome the opportunity to contribute to the review of the Scottish Planning Policy.

General Comments

We believe that the Scottish Planning Policy should be given equal weighting to that of the National Planning Framework and Development Plans. With that in mind we welcome the parallel approach to the review of the National Planning Framework and the Scottish Planning Policy, and we believe that there should be synergy between these documents. We very much support the core principle that the system should be genuinely plan-led.

Specific Comments

There is no reference in the current SPP to the biodiversity duty which all public bodies are bound by. The biodiversity duty should be clearly stated alongside Sustainable Economic Growth and Sustainable Development.

Aquaculture

We support the *presumption against development of marine finfish farm developments on the north and east coasts to safeguard migratory fish species* and believe that this should be emphasised in the updated Scottish Planning Policy. We note that this presumption against development is also included in the draft National Marine Plan, and we believe that reference should also be made to this in the National Planning Framework.

Paragraph 109 in the existing SPP highlights the potential for conflict between fish farming and local fishing interests, including commercial inshore fishing and recreational fishing. Rivers and Fisheries Trusts of Scotland are currently developing, as part of a Scottish Government funded project, a locational guidance tool, to identify, from a recreational fisheries perspective, areas of relative safety for fish farm developments. The tool should be complete by April 2013 and has already received favourable feedback from Local Authority planners, Marine Scotland Science, Marine Scotland Policy, SNH and wild fisheries interests. We believe that reference should be made to this tool in the updated SPP.

Renewable Energy

Paragraph 194 in the existing SPP should also make reference to SEPA's 'Guidance for developers of run-of-river hydropower schemes.'

Conclusion

ASFB supports the SPP review and parallel review of the National Planning Framework and believes that this presents an opportunity to develop further synergy between these documents. We believe it is crucial that these documents are interpreted consistently across Scotland and therefore we would highlight the importance of clear policies which avoid ambiguity. We look forward to participating in the next stage of the review process.

For further information please contact:

Alan Wells | Policy & Planning Director

Tel: 0131 272 2797 | Email: alan@asfb.org.uk

RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

1. Name/Organisation

Organisation Name

Association of Salmon Fishery Boards

Title Mr Ms Mrs Miss Dr Please tick as appropriate

Surname

Wells

Forename

Alan

2. Postal Address

Capital Business Centre

24 Canning Street

Edinburgh

Postcode EH3 8EG

Phone 0131 272 2797

Email alan@asfb.org.uk

3. Permissions - I am responding as...

Individual

/ Group/Organisation

Please tick as appropriate

- (a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate Yes No

- (b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

- (c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick as appropriate Yes No

- (d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate Yes No