



**Invertote Salmon Farm**

**Scotland's National Marine Plan**

**Summary of Policies Considered**

**October 2025**

## Scotland's National Marine Plan 2015

### Summary of policies considered

The following table summarises the consideration that the applicant has given to the policies and aims of Scotland's National Marine Plan. The left-hand column sets out the policy wording from the March 2015 version of the Marine Plan, and the right column sets out how this policy has been considered during the applicants planning for the development, through pre-application consultations and the Planning Application Process and notes where the Planning Authority has considered the aspect/impact in the determination of the Planning Application.

GENERAL POLICIES	
NMP POLICY	CONSIDERATION AND COMMENT
GEN 1 General planning principle: There is a presumption in favour of sustainable development and use of the marine environment when consistent with the policies and objectives of this Plan.	This document demonstrates the consideration that has been given to the policies and objectives of Scotland's National Marine Plan in continuing to operate this developed site. As a fish farm development, the initial proposals were subject to application for planning permission, and the process of determination considered a number of issues which are discussed in the National Marine Plan.
GEN 2 Economic benefit: Sustainable development and use which provides economic benefit to Scottish communities is encouraged when consistent with the objectives and policies of this Plan.	The development is part of an overall project to develop four sites to the east of Trotternish, centred around Staffin. All four sites have planning permission and CAR licences, three have existing Marine Licences with the licence application for the site at Eilean Flodigarry currently in progress. The developer aims to produce organic farmed salmon in manner that reduces the overall environmental impact when compared to a "conventional farm" of similar size. Through the operation of this site in conjunction with the neighbouring site at Culnacnoc OSH has supported economic development through increased employment opportunities for Staffin, Trotternish and the wider area of the Isle of Skye, direct community benefit to NE Skye has been made through 'Bho Mhuir gu Tìr'/From Sea to Land Community Fund.  The overall project seeks to assist Staffin Community Trust in redeveloping the area around Staffin Jetty to allow for harvested fish to be landed to the pier and to increase the security of the Jetty for other marine uses including fishing, marine tourism, and visiting vessels. These developments have been led by Staffin Community Trust and include the provision of improved
GEN 3 Social benefit: Sustainable development and use which provides social benefits is encouraged when consistent with the objectives and policies of this Plan.	

	<p>road access and parking, hardstanding areas as well as electricity and water supplies to Staffin Jetty. There have also been a number of storage units developed at Staffin Jetty which now accommodate a boat builder, a shellfish merchant, a marine tourism operator, a Gaelic education outdoor activities group in addition to the units rented by OSH.</p>
<p>GEN 4 Co-existence: Proposals which enable coexistence with other development sectors and activities within the Scottish marine area are encouraged in planning and decision-making processes, when consistent with policies and objectives of this Plan.</p>	<p>This development has demonstrated co-existence with other development sectors and activities over the timescale of the existing licence.</p> <p>This application does not, at this stage, seek to change the pen layout from that originally granted Marine Licence and developed in 2020. In bringing forward initial proposals for this site the applicant sought, where possible, to adapt its requirements to the needs of other interests. This included, but was not limited to, reduction in pen numbers at early stage of process to reduce impact on views from key coastal viewpoints, reduction in mooring area shoreward of the site to address concerns from mobile gear fishing interests expressed at pre-application consultation.</p>
<p>GEN 6 Historic environment: Development and use of the marine environment should protect and, where appropriate, enhance heritage assets in a manner proportionate to their significance.</p>	<p>The development does not impact on marine heritage assets as set out in the National Marine Plan. Consideration of the impact of the development on terrestrial features of historical importance was included in documents submitted to the Planning Authority and was a consideration in the determination of the Planning Application.</p>
<p>GEN 7 Landscape/seascape: Marine planners and decision makers should ensure that development and use of the marine environment take seascape, landscape and visual impacts into account.</p>	<p>Landscape, Seascape and Visual Impact of the proposed development was a major consideration in site selection. The developer sought to minimise, as far as possible, the impact on views from residential properties and major viewpoints marked on Ordnance Survey Base mapping. A Landscape and Visual Impact Assessment was a key element of documentation submitted in support of the planning application and was a material consideration in the planning determination. As this application is for an existing site it does not present any greater visual impact than when previously developed.</p>
<p>GEN 8 Coastal process and flooding: Developments and activities in the marine environment should be resilient to coastal change and flooding, and not have unacceptable adverse impact on coastal processes or contribute to coastal flooding</p>	<p>It is considered that, as a floating structure, the proposed development is resilient to coastal change and flooding. It will not have an adverse impact on coastal processes.</p>

<p>GEN 9 Natural heritage: Development and use of the marine environment must:</p> <ul style="list-style-type: none"> <li>(a) Comply with legal requirements for protected areas and protected species.</li> <li>(b) Not result in significant impact on the national status of Priority Marine Features.</li> <li>(c) Protect and, where appropriate, enhance the health of the marine area.</li> </ul>	<p>In bringing forward the proposed development consideration has been given to the presence, in the wider area of protected species, and the location of the development within the Inner Hebrides and Minches SAC. Within the planning application, mitigation measures were proposed which have, where the planning authority considered necessary, been incorporated into planning conditions. An Appropriate Assessment was carried out by the Planning Authority in determining the Planning Application, this is included in the submitted planning report.</p> <p>The Presence of a small area of Priority Marine Feature at the south end of the proposed site area is considered in the planning submissions and commented on by SNH.</p>
<p>GEN 10 Invasive non-native species: Opportunities to reduce the introduction of invasive non-native species to a minimum or proactively improve the practice of existing activity should be taken when decisions are being made.</p>	<p>Pens and feed barge are currently off site to prevent damage whilst the business is in a refinancing phase. When replaced pens will be assembled within Highland reducing the opportunity for INNS to be transferred onto the site from further afield.</p>
<p>GEN 11 Marine litter: Developers, users and those accessing the marine environment must take measures to address marine litter where appropriate. Reduction of litter must be taken into account by decision makers.</p>	<p>The Application for Planning Permission was supported by the inclusion of a stand-alone Waste Minimisation and Management plan. This was requested by consultees at EIA Scoping. Within the plan the developer sets out its policies in relation to Marine Litter, including zero tolerance of overboard waste and that the business will undertake shoreline litter collection.</p>
<p>GEN 12 Water quality and resource: Developments and activities should not result in a deterioration of the quality of waters to which the Water Framework Directive, Marine Strategy Framework Directive or other related Directives apply.</p>	<p>The Water Quality impact of the proposed development is assessed by SEPA under the Controlled Activities Regulations, and we understand that the existing licences are due to transfer</p>
<p>GEN 13 Noise: Development and use in the marine environment should avoid significant adverse effects of man-made noise and vibration, especially on species sensitive to such effects.</p>	<p>In bringing forward the proposals the developer has sought to minimise the impact of noise from the site on human receptors on the shore. The planning permission issued by Highland Council includes conditions relating to noise.</p> <p>The impact of underwater noise from boat movements was considered by the developer in submissions to the Planning Authority.</p>
<p>GEN 14 Air quality: Development and use of the marine environment should not result in the deterioration of air quality and should not breach any statutory air quality limits.</p>	<p>It is not considered that there will be any significant impact on air quality resulting from the proposed development.</p>

<p>GEN 15 Planning alignment A: Marine and terrestrial plans should align to support marine and land-based components required by development and seek to facilitate appropriate access to the shore and sea.</p>	<p>The proposed development will continue to require day to day shore access and small boat moorings at Staffin Jetty. Larger workboats will operate from Portree over the winter months; however, the intention remains to accommodate vessels on moorings in Staffin Bay once proposed pier development is complete.</p>
<p>GEN 16 Planning alignment B: Marine plans should align and comply where possible with other statutory plans and should consider objectives and policies of relevant non-statutory plans where appropriate to do so.</p>	
<p>GEN 18 Engagement: Early and effective engagement should be undertaken with the general public and all interested stakeholders to facilitate planning and consenting processes.</p>	<p>We have not undertaken consultation with regard to the continuation of use of this existing site which has valid planning permission, SEPA CAR licence and Crown Estate Lease extending beyond the expiration date of the existing Marine Licence.</p> <p>Organic Sea Harvest undertook informal consultation with several public bodies during its initial site selection process, this included meetings involving Scottish Natural Heritage and the Highland Council during 2015, meetings with the Crown Estate prior to seeking Lease Option Agreements during August 2016. Email contact was made with Northern Lighthouse Board, and Defence Infrastructure Organisation during November 2016. During this time proposals were discussed with the local Community through the Staffin Community Trust.</p> <p>Prior to submitting applications for EIA Scoping OSH undertook advertised local Pre-application during February 2017, this included a Public Drop-in session at Staffin Community Centre. Poster presentation, video displays and opportunity to speak to company directors about the proposals.</p> <p>Formal Pre-application advice was sought from The Highland Council, Scottish Natural Heritage, Marine Scotland Science, Marine Scotland Licencing, Fish Health Inspectorate (including Freshwater Fisheries Lab). Scottish Environment Protection Agency, Northern Lighthouse Board, Skye District Salmon Fishery Board and Defence Infrastructure Organisation. In addition, other representative organisations were informed of the pre-app process, invited to attend the Open Day and to comment and/or provide information as appropriate. These organisations included, but are not limited to, Mallaig and Northwest Fishermen's Organisation, Royal Yachting Association (Scotland).</p>

SEA FISHERIES	
NMP POLICY	CONSIDERATION AND COMMENT
<p>FISHERIES 3: Where existing fishing opportunities or activity cannot be safeguarded, a Fisheries Management and Mitigation Strategy should be prepared by the proposer of development or use, involving full engagement with local fishing interests (and other interests as appropriate) in the development of the Strategy. All efforts should be made to agree the Strategy with those interests. Those interests should also undertake to engage with the proposer and provide transparent and accurate information and data to help complete the Strategy. The Strategy should be drawn up as part of the discharge of conditions of permissions granted. The content of the Strategy should be relevant to the particular circumstances and could include:</p> <ul style="list-style-type: none"> <li>• An assessment of the potential impact of the development or use on the affected fishery or fisheries, both in socio-economic terms and in terms of environmental sustainability.</li> <li>• A recognition that the disruption to existing fishing opportunities/activity should be minimised as far as possible.</li> <li>• Reasonable measures to mitigate any constraints which the proposed development or use may place on existing or proposed fishing activity.</li> <li>• Reasonable measures to mitigate any potential impacts on sustainability of fish stocks (e.g. impacts on spawning grounds or areas of fish or shellfish abundance) and any socioeconomic impacts. Where it does not prove possible to agree the Strategy with all interests, the reasons for any divergence of views between the parties should be fully explained in the Strategy and dissenting views should be given a platform within the Strategy to make their case.</li> </ul>	<p>Impact on Commercial Fishing was considered during the determination of the planning application.</p> <p>Fishermen's Organisations were invited to comment on proposals during our pre-application consultation in early 2017. The open day held in Staffin was attended by local mobile gear fishermen who provided information that the inshore side of the lease areas depicted at the time was problematic for them. We requested that chart plotter information be forwarded in confidence this was not, however, forthcoming. The information provided at the open day was one factor taken into consideration in finalising site location; the site area applied for at planning and in this licence, application is smaller than the Crown Estate Lease Area and incorporates shorter mooring legs on the shoreward side of the proposed development in order to minimise impact on mobile gear fishermen.</p> <p>As part of the assessment of other marine activities taking place on the site OSH purchased AIS datasets covering the area, within this data incidence of trawling/dredging activity within the site area was very low with the focus of fishing activity seaward of a 100m isobath over 1km southwest of the site.</p> <p>Creel fishing is known to take place shoreward of and to the south end of the proposed site area. OSH has engaged with local creel fishermen throughout the process of site selection.</p> <p>It is not considered that continued operation of this development will have any significant adverse impact on the area of fishing grounds available to the commercial fishing activities. The proposed development may, however, continue to offer additional employment opportunities for qualified skippers and crews.</p>
<p>FISHERIES 4: Ports and harbours should seek to engage with fishing and other relevant stakeholders at an early stage to</p>	<p>This policy is directed at the operators of ports and harbours. Whilst OSH has not considered this policy in bringing forward proposals it is noted that the mid to long term intention of proposed</p>

<p>discuss any changes in infrastructure that may affect them. Any port or harbour developments should take account of the needs of the dependent fishing fleets with a view to avoiding commercial harm where possible. Where a port or harbour has reached a minimum level of infrastructure required to support a viable fishing fleet, there should be a presumption in favour of maintaining this infrastructure, provided there is an ongoing requirement for it to remain in place and that it continues to be fit for purpose.</p>	<p>development at Staffin Jetty is that there will be additional facilities for commercial fishing interests.</p>
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AQUACULTURE	
NMP POLICY	CONSIDERATION AND COMMENT
AQUACULTURE 3: In relation to nutrient enhancement and benthic impacts, as set out under Locational Guidelines for the Authorisation of Marine Fish Farms in Scottish Waters, fish farm development is likely to be acceptable in Category 3 areas, subject to other criteria being satisfied. A degree of precaution should be applied to consideration of further fish farming development in Category 2 areas and there will be a presumption against further fish farm development in Category 1 areas.	The proposed development is in open water out with any area included in the Locational Guidelines and as such is uncategorised.
AQUACULTURE 5: Aquaculture developments should avoid and/or mitigate adverse impacts upon the seascape, landscape and visual amenity of an area, following SNH guidance <sup>75</sup> on the siting and design of aquaculture.	This Policy duplicates policy GEN 7. Please refer to the information above.
AQUACULTURE 6: New aquaculture sites should not bridge Disease Management Areas although boundaries may be revised by Marine Scotland to take account of any changes in fish farm location, subject to the continued management of risk.	This is not a new Aquaculture site.
AQUACULTURE 7: Operators and regulators should continue to utilise a risk-based approach to the location of fish farms and potential impacts on wild fish.	Impact on wild salmonids was considered in the determination of the Planning Application for this site. Planning Permission was issued subject to condition that the site is operated in accordance with an Environmental Management Plan facilitating the adaptive management of the site to maintain on site fish health and to reduce and mitigate adverse impacts on wild salmonids. The need for this EMP condition has since been superseded by new SEPA CAR licence provisions in relation to a Sea Lice Risk Management Framework although elements of this are currently subject to legal challenge.
AQUACULTURE 8: Guidance on harassment at designated seal haul out sites should be taken into account and seal conservation areas should also be taken into account in site selection and operation. Seal licences will only be granted where other management options are precluded or have proven unsuccessful in deterrence.	Distance from designated seal haul outs was an early consideration in site selection and the site is more than 7Km from the closest designated haul which is on the Isle of Rona.  The presence of seals in the water close to the site has informed the operational practices on the site. The development will incorporate the use of pen nets marketed as seal resistant. Measures will be taken to reduce risk of entanglement to marine mammals and other wildlife and to ensure



	<p>vessel movements recognise the presence of marine life. These measures were set out in the Environmental Statement accompanying the planning application and were considered in determining the planning application for this site.</p> <p>It has been the experience of OSH in operating this site that seals regularly haul out on pen walkways and feedpipes and are not readily disturbed by routine boat traffic at the site.</p>
AQUACULTURE 9: Consenting and licensing authorities should be satisfied that appropriate emergency response plans are in place.	This Policy is directed at consenting and licencing authorities.
AQUACULTURE 10: Operators should carry out pre-application discussion and consultation and engage with local communities and others who may be affected, to identify and, where possible, address any concerns in advance of submitting an application.	This policy duplicates policy GEN 18 please refer to the information above.
AQUACULTURE 11: Aquaculture equipment, including but not limited to installations, facilities, moorings, pens and nets must be fit for purpose for the site conditions, subject to future climate change. Any statutory technical standard must be adhered to. Equipment and activities should be optimised in order to reduce greenhouse gas emissions.	Equipment has been specified and supplied in accordance with the Scottish Technical Standard. It is certified as fit for purpose by the supplier/manufacturer.
AQUACULTURE 12: Applications which promote the use of sustainable biological controls for sea lice (such as farmed wrasse) will be encouraged.	Organic Sea Harvest has previously used farmed lumpsucker, farmed wrasse and locally caught wild wrasse on this site but has since adopted the policy of not stocking cleaner fish to its sites.
AQUACULTURE 13: Proposals that contribute to the diversification of farmed species will be supported, subject to other objectives and policies being satisfied.	At this stage the project proposes to farm Salmon and there are no current plans for diversification into other species.
AQUACULTURE 14: The Scottish Government, aquaculture companies and Local Authorities should work together to maximise benefit to communities from aquaculture development.	This policy duplicates the provisions of policies GEN 2 and 3. Please refer to these sections above.

WILD SALMON AND DIADROMOUS FISH	
NMP POLICY	CONSIDERATION AND COMMENT
WILD FISH 1: The impact of development and use of the marine environment on diadromous fish species should be considered in marine planning and decision-making processes. Where evidence of impacts on salmon and other diadromous species is inconclusive, mitigation should be adopted where possible and information on impacts on diadromous species from monitoring of developments should be used to inform subsequent marine decision making.	Please refer to Policy Aquaculture 7 above.

RECREATION AND TOURISM	
NMP POLICY	CONSIDERATION AND COMMENT
REC & TOURISM 1: Opportunities to promote sustainable development of marine recreation and tourism should be supported.	Our analysis of AIS datasets indicates limited use of the area for boat based marine tourism. Opportunities for tourism of this nature has been improved through the development of Staffin Jetty facilitated by the proposed development.
<p>REC &amp; TOURISM 2: The following key factors should be taken into account when deciding on uses of the marine environment and the potential impact on recreation and tourism:</p> <ul style="list-style-type: none"> <li>• The extent to which the proposal is likely to adversely affect the qualities important to recreational users, including the extent to which proposals may interfere with the physical infrastructure that underpins a recreational activity.</li> <li>• The extent to which any proposal interferes with access to and along the shore, to the water, use of the resource for recreation or tourism purposes and existing navigational routes or navigational safety.</li> <li>• Where significant impacts are likely, whether reasonable alternatives can be identified for the proposed activity or development.</li> <li>• Where significant impacts are likely and there are no reasonable alternatives, whether mitigation, through recognised and effective measures, can be achieved at no significant cost to the marine recreation or tourism sector interests.</li> </ul>	The Environmental Statement Submitted to Highland Council in support of the Planning Application included analysis of the impact of the proposed development on various recreation and tourism activities. These included sailing, Cruise boats, sub-aqua, sea kayaking, sea angling, travel by car and coach and coastal walking. This information was considered in the determination of the Planning Application.
REC & TOURISM 3: Regional marine plans should identify areas that are of recreational and tourism value and identify where prospects for significant development exist, including opportunities to link to the National Long-Distance Walking and Cycle Routes, and more localised and/or bespoke recreational opportunities and visitor attractions.	It is noted that the Isle of Skye is an important destination for recreation and tourism. The site location has been chosen to avoid major, significant impacts on terrestrial viewpoints.

REC & TOURISM 6: Codes of practice for invasive non-native species and Marine Wildlife Watching should be complied with.	Whilst this policy is directed at Recreation and Tourism Operators, Organic Sea Harvest will continue to undertake staff training to ensure that boat movements are compatible with the provisions of Marine Wildlife Watching Codes of Practice to seek to mitigate the impacts of the development and on-site operations on wildlife.
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SHIPPING, PORTS, HARBOURS AND FERRIES	
NMP POLICY	CONSIDERATION AND COMMENT
<p>TRANSPORT 1: Navigational safety in relevant areas used by shipping now and in the future will be protected, adhering to the rights of innocent passage and freedom of navigation contained in UN Convention on the Law of the Sea (UNCLOS). The following factors will be taken into account when reaching decisions regarding development and use:</p> <ul style="list-style-type: none"> <li>• The extent to which the locational decision interferes with existing or planned routes used by shipping, access to ports and harbours and navigational safety. This includes commercial anchorages and defined approaches to ports.</li> <li>• Where interference is likely, whether reasonable alternatives can be identified.</li> <li>• Where there are no reasonable alternatives, whether mitigation through measures adopted in accordance with the principles and procedures established by the International Maritime Organization can be achieved at no significant cost to the shipping or ports sector.</li> </ul>	<p>As an existing site it is marked in accordance with NLB requirements with visits by and ongoing dialogue with NLB inspectors. The site has been depicted on Admiralty Charts since its development.</p> <p>The proposed development is distant from any ferry routes.</p>

DEFENCE	
NMP POLICY	CONSIDERATION AND COMMENT
<p>DEFENCE 1: To maintain operational effectiveness in Scottish waters used by the armed services, development and use will be managed in these areas:</p> <ul style="list-style-type: none"> <li>• Naval areas including bases and ports: Safety of navigation and access to naval bases and ports will be maintained. The extent to which a development or use interferes with access or safety of navigation, and whether reasonable alternatives can be identified, will be taken into account by consenting bodies. Proposals for development and use should be discussed with the MOD at an early stage in the process.</li> <li>• Firing Danger Areas: Development of new permanent infrastructure is unlikely to be compatible with the use of Firing Danger Areas by the MOD. Permitted activities may have temporal restrictions imposed. Proposals for development and use should be discussed with the MOD at an early stage in the process.</li> <li>• Within Exercise Areas, activities may be subject to temporal restrictions. Development and use that either individually or cumulatively obstructs or otherwise prevents the defence activities supported by an exercise area may not be permitted. Proposals for development and use should be discussed with the MOD at an early stage in the process.</li> <li>• Communications: Navigations and surveillance including radar: Development and use which causes unacceptable interference with radar and other systems necessary for national defence may be prohibited if mitigation cannot be determined. Proposals for development and use should be discussed with the MOD at an early stage in the process.</li> </ul>	<p>Organic Sea Harvest has undertaken preliminary discussions with the MOD through the Defence Infrastructure Organisation. An initial inquiry was made in November 2016 with formal pre-application consultation undertaken in January 2017 with email communications thereafter.</p> <p>In common with much of Scotland's coastline the proposed development area is located within a military exercise area (in this case the site is located within Area X5720, Portree). DIO also highlighted the presence of the BUTEC Rona and Raasay Range over 10km to the west of the proposed site.</p> <p>The MOD did not object to, nor did it seek specific operating conditions in relation to the original Marine Licence for this site.</p>

Scotland's National Marine Plan – Policies not considered

The following policies have not been considered in bringing forward this development proposal. These policies either have no bearing on the actions of the developer and relate to the actions of regulators or third parties or relate to marine use where there is no interaction with the proposed development.

General Policies (GEN 5, 17 and 19 – 21)

Sea Fisheries (FISHERIES 1, 2 and 5)

Aquaculture (AQUACULTURE 1, 2 and 4)

Recreation and Tourism (REC AND TOURISM 4 and 5)

Oil and Gas (All Policies)

Carbon Capture and Storage (CCS) (All Policies)

Offshore Wind and Marine Renewable Energy (All Policies)

Shipping, Ports, Harbours and Ferries (TRANSPORT 2-7)

Submarine Cables (All Policies)

Defence (Policies 2-3)

Aggregates (All Policies)