



Proposed eight-grid seaweed farm in Loch Snizort, Isle of Skye

Appendix 5 - Marine Planning Policy Compliance

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1 Introduction

- 1.1.1 In keeping with the requirements in Section 6 of the Marine Scotland Application form, the following document presents the Applicant's review of Scotland's Marine Plan.

2 Scotland's National Marine Plan

- 2.1.1 Scotland's National Marine Plan (NMP) covers the management of both Scottish inshore waters (out to 12 nautical miles) and offshore waters (12 to 200 nautical miles).
- 2.1.2 One of the core aims of marine planning is to manage human impact on the marine environment, ensuring that marine ecosystems continue to provide a range of goods and services.
- 2.1.3 The plan stipulates a core set of General Policies which apply across all development and use of the marine environment. There are more focused sectoral policies that address issues beyond the core General Policies.

Policy	Kaly Response
<p>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.</p>	<p>Seaweed cultivation is an emerging sector in Scotland but is recognised as a sustainable business – an economically productive activity, in the NMP. Through extensive consultation and engagement exercises, both with local Loch users and consultees, the location of the proposed development site has been chosen where it will have the least impact on other users of the marine environment. The farm will be constructed from corrosion free, low maintenance materials, and will have a negligible impact on the surrounding environment. Weekly monitoring will be undertaken to check for any damage to the growing lines and to clear any debris.</p>
<p>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.</p>	<p>Kaly are committed to developing a cluster of seaweed farms across North West Skye, with the aims of establishing a hub of industry for seaweed growing and processing in Scotland. During operation of the initial seaweed farms, Kaly expect to provide local employment opportunities, to the order of 2 local Full Time Equivalent (FTE) employees for seaweed harvesting, with up to 4 further seasonal staff at peak times for a single farm. Kaly also expect to operate a Community Marine Fund which will provide local economic benefit. As part of this commitment, Kaly will contract ancillary support services to supplement farm services and logistics. Employment as part of the Community Marine Fund will be provided on a year-round basis.</p>
<p>Gen 3 – Social Benefit – Sustainable development use which provides social benefits is encourage when consistent with the objectives and policies of this plan.</p>	<p>Kaly’s employment policy and practice favours individuals and groups who are from the local community. Kaly will invite local creel fishers and other interested parties including local communities to enter into commercial agreements with Kaly to jointly undertake training programmes, develop farm design techniques, farm deployment, the seeding of growing lines, farm and environmental monitoring, and the eventual harvest of cultivated kelp. In this way, the Applicant will be supporting the local community through an Annual Management Fee. The Community Marine Fund is estimated at £360,000 each year from 2028 from a Northwest Skye</p>

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<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>cluster.</p> <p>The applicant is acutely aware of the importance of taking cognisance of existing marine users in the Loch area. Kaly have engaged with local communities from the earliest design stages to get input on location for the proposed development. Discussions from the earliest stages have influenced the site selection and final positioning, with the proposed development placed in a location where it will have the least possible impact on existing marine users. At a pre-application stage, Kaly commissioned independent environmental consultants to carry out a desk-based study on potential locations to determine if there would be and major impacts caused by the proposed development. The desk-based review took into account a range of factors including environmental, visual, and operational criteria. The site will be marked by two flashing yellow Special Marks at its outer edges – consultation will continue with NLB and MCGA.</p>
<p>Gen 5 – Climate Change – Marine planners and decision makers must act in the way best calculated to mitigate, and adapt to, climate change.</p>	<p>Kaly has started from a zero-carbon baseline and aims to maintain its Net Zero baseline while building as a business. Kaly is committed to exploring sustainable material use in its operation e.g. in buoy material. Seaweed cultivation does not require any additions during the growing process and absorbs carbon dioxide as it grows from the surrounding waters. Kaly intend to grow seaweed for a variety of sustainable end products e.g. bioplastics, nutraceuticals, amalgams and fertilisers. It is the hope that these can replace less sustainable products currently available on the market. Kaly has a program of electrification for their marine and land modes of transport. The advancement of hybrid engine technology is now available for smaller style boats. Vehicles including vans and lorries are now capable of being battery operated. Other equipment for movement of harvest to shore and delivery to the Hub will be non-fossil fuel based. The Hub processing facilities will be located</p>

Policy	Kaly Response
	<p>close to the landing point at Dunvegan to reduce road miles. All processing equipment at the Hub will operate using renewable energy. The above mitigation and adaptation measures will be monitored and calculated as part of Kaly's ongoing carbon mitigation strategy, net zero carbon footprint commitment, and internal Quality Control Management System to ensure compliance is met.</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>Castle Uisdein, a Scheduled Monument (SM 8465) is located east of the proposed development site. It is considered that impacts on the setting of this scheduled monument will be negligible as much of the seaweed farm infrastructure will be subsurface. While the LVA states that most impacts to visual amenity will be predominantly from this site, it has concluded that, in this remote coastal landscape context, the changes would be perceived as adverse to neutral in nature but limited.</p> <p>A Landscape and Visual Assessment (LVA) has been undertaken from key viewpoints to determine levels of visual impact on key viewpoints caused by the proposed development. The LVA has concluded that the degree of effect would be limited and the extent of any initial potentially noticeable adverse landscape and visual effects would be localised to the site and its close surroundings. Landscape and visual effects at distances beyond c.0.5-1.0km would be negligible.</p> <p>There will be a monitoring programme in place during operation of the seaweed farm, with a weekly check of the farm for any issues / entanglement etc. This will be conducted by a singular boat, ideally by a community member already on the water, and so will not present an increase in marine traffic in this area.</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>The proposed development has been carefully sited away from key viewpoints that may experience negative visual impacts. Further, the seaweed farm has a low visual profile as much of the infrastructure required is sub-surface. The most visual aspect of the farm</p>

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	<p>will be the Special Marker buoys, which are required to clearly delineate the outer limits of the site for marine users.</p> <p>A Landscape and Visual Assessment (LVA) has been undertaken from key viewpoints to determine levels of visual impact on key viewpoints caused by the proposed development. The LVA has concluded that the degree of effect would be limited and the extent of any initial potentially noticeable adverse landscape and visual effects would be localised to the site and its close surroundings. Landscape and visual effects at distances beyond c.0.5-1.0km would be negligible.</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>The seaweed farm is expected to last in changing future coastal conditions. There is an ongoing monitoring programme in place for the proposed development, where any damage to the seaweed farm will be spotted and adequately cleared / fixed. In the event of damage to the seaweed farm, Kaly have a duty of care to remove any marine debris.</p> <p>The proposed development will have no impact on coastal processes or flooding.</p> <p>The anchors holding the farm will not block the movement of sand on the seabed from its natural course, nor will they affect the benthic environment.</p> <p>Servicing of the farm will be from an established harbour, therefore no new coastal infrastructure is required.</p>
<p>Gen 9 – Natural Heritage – Development and use of the marine environment must:</p> <p>(a) Comply with legal requirements for protected areas and protected species.</p>	<p>(a) The proposed development site is within the Inner Hebrides and the Minches Special Area of Conservation (SAC)¹. The SAC is designated for Harbour Porpoise (<i>Phocoena Phocoena</i>).</p> <p>The site is also within a Shellfish Water Protected area, which is an area designated for the protection of shellfish growth and production.</p>

¹ <https://sitelink.nature.scot/site/10508>

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<p>(b) Not result in significant impact on the national status of Priority Marine Features.</p> <p>(c) Protect and, where appropriate, enhance the health of the marine area.</p>	<p>Kaly will be submitting a Habitats Regulations Appraisal (HRA) to determine the impact on these designations and to determine appropriate mitigation measures.</p> <p>Kaly are committed to obliging with all legislation set to protect the many protected status habitat species in the area. As with the previously consented Loch Bay development, Kaly expect to comply with a planning condition relating to seal haul out timings and bird breeding seasons. Kaly will not deploy and marine infrastructure during these times.</p> <p>(b) There are no Priority Marine Features (PMFs) recorded within the site boundary.</p> <p>(c) Seaweed does not require any additives such as chemicals for growth. Further, Kaly are committed to removing any marine litter / debris that may occur as a result of the development.</p>
<p>Gen 10 – Invasive non-native species – Opportunities to reduce the introduce 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>Kaly are submitting a Biosecurity Plan as part of this application, which all sea vessels, equipment, and personnel will follow.</p> <p>The seaweed species Kaly intend to cultivate are native to the Loch system and seaweed for cultivation will be collected close to the farm site and cultured in clinical laboratory conditions.</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>Any waste generated from the project will be disposed of ashore through local, certified commercial waste disposal. All ropes and equipment will be stored ashore during fallow periods of the farm (May to October). And all cleaning of ropes and equipment will be done ashore. There are no Special Waste requirements envisaged.</p> <p>The seaweed farm is expected to last in changing future coastal conditions. There is an ongoing monitoring programme in place for the proposed development, where any damage to the seaweed farm will be spotted and</p>

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	adequately cleared / fixed. In the event of damage to the seaweed farm, Kaly have a duty of care to remove any marine debris.
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.	There are no freshwater needs or wastewater created by seaweed cultivation. Cultivating seaweed at the proposed farm site will take up nutrients, especially nitrates from the water moving through the site. This will improve the water quality in the coastal zone by reducing nutrient loading that can lead to algal blooms in summer.
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.	Kaly do not envisage additional noise pollution due to the proposed development as the only noise will come from vessels, and vessel activity on site is minimal.
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.	Kaly do not envisage any impacts on air quality as a result of the proposed development.
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.	Algal Farms do not require planning permission under T&C Planning as finfish and shellfish aquaculture does. Kaly will be using existing shore infrastructure to land harvests and service the site, and the Processing Hub building will be subject to separate planning consent. The farm infrastructure deployment and harvest season is short (6-8 weeks in total) and will require 20 lorry movements over that period from pier to Hub.
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.	As above.
Gen 17 – Fairness – All marine interests will be treated with fairness and in a transparent manner when decisions are being made in the marine environment.	There will be few vessel movements in the area during operation, presenting little increase to marine traffic in the area. Kaly do appreciate that the construction and operation of the seaweed farm will result in the restriction of access for fishing to an area of the seabed. Kaly have undergone extensive consultation with local fisherman and users of the loch to ensure the proposed development has been sited in an area where

Policy	Kaly Response
	any impacts are reduced as far as possible. Kaly have also consulted many stakeholders and all Statutory Consultees to keep them abreast of the proposed development as it has progressed.
Gen 18 – Fairness – Early and effective engagement should be undertaken with the general public and all interested stakeholders to facilitate planning and consenting processes.	Local engagement has been ongoing since later 2024. Kaly held a ‘pre- pre-’ application event across North West Skye in March 2025 to seek feedback from local communities on the location of the proposed development. Kaly then held a pre-application consultation event in June 2025 to inform local communities of the chosen locations, informed by the previous events. During the screening and consulting process, Kaly have considered development locations suggested by local Loch users, and discarded those where there would be significant conflict with local users. The proposed site has been advertised across northwest Skye through local press, emails, and face-to-face meetings as required by the pre-application consultation process.
Gen 19 – Sound evidence – Decision making in the marine environment will be based on sound scientific and socio-economic evidence.	Although seaweed cultivation is still in its infancy in Scotland, there are examples from other areas that the Applicant seek to utilise for their own growing techniques and system. In particular, the Scottish Association for Marine Science (SAMS) who have successfully operated a farm near Oban. The Applicant have sought advice from SAMS previously on a variety of seaweed farming topics, in particular for their Loch Bay planning application. Kaly intend to use lessons learned from this partnership to inform their business model and future sites.
Gen 20 – Adaptive management – Adaptive management practices should take account of new data and information in decision making, informing future decisions and future iteration of policy.	Robust management of the project will be undertaken by the Kaly team, who have business and marine industry experience. The previously consented site at Loch Bay is being used as a ‘test’ location for seaweed cultivation. Lessons from growing seaweed lines at Loch Bay will be used to inform techniques at other Kaly sites. Links with research and development organisations involved with the cultivation of seaweed have been formed, e.g. Hortimare, Oceanium and SAMS. These organisations

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	have an established track record of working with other seaweed farmers in Northern Europe and have assisted ourselves in setting up existing management practice and informing us where new developments are taking place.
Gen 21 – Cumulative Impacts – Cumulative impacts affecting the ecosystem of the marine plan area should be addressed in decision making and plan implementation.	The applicant is aware of various other developments within the Loch system, including fish farms, and the potential of ‘spatial squeeze’ for existing Loch users, especially creel fisherman. Further, there are nearby applications for Glen Ullinish II windfarm, which has the potential to lead to cumulative impacts. It is considered however, that due to the small size and sub-surface nature of the proposed development, that potential cumulative impacts are not significant. The seaweed farm has also been sited where it will have minimal impact on existing Loch users, and will therefore have little impact on the ‘spatial squeeze’ of the Loch system.

3 Scotland's Seaweed Cultivation Policy Statement

3.1.1 The Scottish Government supports the sustainable growth of the seaweed cultivation sector as a means to diversify the aquaculture sector.

3.1.2 The table below presents Kaly's understanding of the policies within this statement.

Policy	Kaly Response
Policy 1 – In principle, the SG is supportive of small-medium farm seaweed cultivation, subject to regulatory consideration; the General Policies set out in Chapter 4 of Scotland’s National Marine Plan; and any other relevant policies within that Plan. Application for such seaweed farms should demonstrate that mitigation measures have been considered to prevent adverse environmental impacts, and set out how these will be delivered.	See table above.
Policy 2 – Only species native to the area where seaweed cultivation will take place should be cultivated, to minimise the risk from non-native species.	Seeded stock of preferred species <i>Ulva lactuca</i> (Atlantic Wakame) and <i>Sargassum latissimum</i> (Sugar Kelp) will be sourced from the local Loch system. It is from these rocky shores that small amounts of fertile seaweed material will be taken for stock in the seeding process.
Policy 3 – Where seaweed is grown for human consumption, cultivators should site farms away from sewage outfalls and other potential sources of pollution.	Kaly intend to carry out scientific testing of their grown seaweed to test which compounds are found within the cultivated material. The makeup of the compounds will determine the end use of seaweed. Kaly will follow all standards in the case that their grown seaweed is to be grown for human consumption. The proposed development is not currently sited near any pollution sources.
Policy 4 – Equipment used in seaweed cultivation should be fit for purpose to withstand damage from adverse weather conditions.	All equipment and farm infrastructure proposed is designed to exceed the most adverse sea weather conditions envisaged during the life of the farm. Farm designs will exceed in robustness, the maximum adverse sea conditions and drag forces they will encounter. Consultation events have been useful in gathering information from local marine users who have local detailed knowledge of weather conditions. Sites susceptible to harsh weather conditions have been avoided.
Policy 5 – Other marine users and activities should be considered in the siting of farms.	Kaly have undertaken a substantial pre-application process. The first event comprised a ‘pre-, pre-’ application event, in which Kaly presented local communities with a range of potential development sites, and sought feedback on the best location to avoid significant impact on existing Loch users. Feedback from this event influenced later site location and the

Policy	Kaly Response
	<p>second pre-application event informed local communities of the chosen location.</p> <p>Further meetings with Community Council groups and fisherman have been undertaken where appropriate for a more detailed view from local groups on the proposals.</p>
<p>Policy 6 – Small-medium size farming is unlikely to be spatially limited, and may be located anywhere in Scotland, subject to agreement and appropriate local conditions.</p>	<p>Kaly have undergone an extensive site selection process. An environmental due diligence / risk assessment was first conducted based on a selection of sites initially selected, undertaken by an independent environmental consultant.</p> <p>During the ‘pre-, pre-‘ application consultation events in March 2025, the Applicant presented a range of potential site locations to local communities and sought feedback on which location would be most appropriate for marine users and locals.</p> <p>The outcome of these consultation events, and other meetings with community councils and fishing groups, informed the final site selection.</p> <p>During June 2025, Kaly conducted a second stage of pre-application events to inform local communities of the final sites chosen and to hear any further feedback to consider in the final design stages before the application was submitted.</p>
<p>Policy 7 – The SG is supportive of IMTA</p>	<p>Kaly are currently investigating Integrated Multi Trophic Aquaculture (IMTA) as a means of improving the marine environment, providing supplemental income, and increasing biodiversity. It is considering that IMTA will form part of Kaly’s business once the initial venture of seaweed farming is viable and sustainable. IMTA is something Kaly intend to test at the Loch Bay ‘Home Farm’ along with a range of other initiatives including lobster hatchery, fish nursery, and seagrass cultivation. Kaly will consider these opportunities and apply for any additional trophic license consent through the appropriate Marine Scotland route.</p>