

# **The Town and Country Planning (Marine Fish Farming) (Scotland) Amendment Order 2025**

## **Response from Orkney Islands Council**

Good afternoon,

**Do you agree with local authorities being designated as the planning authority for considering proposals aquaculture developments from 3-12 nautical miles?**  
Yes

**Are you content with the proposed boundaries of marine planning zones under the SSI?**

Orkney Islands Council (OIC) set out a preference for alignment between the Orkney Islands Marine Planning Zone and the Orkney Islands Scottish Marine Region in response to the formal consultation but do not consider it to be a 'showstopper' that the two zones will not align.

**Do you have any other concerns or views on the SSI, particularly with regards to cost and resource/expertise implications for local authority planning departments?**

As detailed in the OIC response to the formal consultation, the Partial Business and Regulatory Impact Assessment conclusion that there will be no significant impact on the planning authority costs in relation to the extension of the marine planning zone is considered accurate. That said, fish farm applications are not processed on a full cost recovery basis. Fish farm applications are complex and are frequently EIA developments, therefore they are very resource intensive to process. Planning application fees for fish farms should be increased to address this issue, and further resources made available for planning authorities to discharge their wider functions for strategic planning and management of the fish farming sector.