

Written submission from Argyll and Bute Council

Chapter 6 – Policy FISHERIES 3

The Council considers that there is a lack of clarity as to the purpose of Policy FISHERIES 3 and when it would apply. In some Sectoral Chapters individual policies are grouped under headings for 'Marine Planning' and 'Marine Licensing'. For the fisheries chapter all policies are under the 'Marine Planning' heading but it is not at all clear as to whether this policy applies to proposals identified during the development of regional marine plans, such as safeguarding of marine areas for other activities, or whether it meant apply to individual development proposals being considered through the marine licensing process or the terrestrial planning process for aquaculture development. This needs to be made clear.

If this policy does apply to aquaculture development then it is considered that it could be interpreted to apply to any development which uses an area of seabed which is fished, regardless of scale or level of fishing activity. This could mean that applicants for small scale marine developments would have to develop a detailed Fisheries Management and Mitigation Strategy, where there are normally very limited options for mitigation of impact.