

RESPONSE FORM

DRAFT SEAWEED POLICY STATEMENT 2013

1. Do you agree with policies 1-6?

Yes

2. Should policy 2 require local provenance, i.e., stock must originate from the water body the seaweed is to be grown in? YES/ NO

Do not know

3. Do you agree with policy 7? YES

This should always apply to development

4. Do you agree with policies 8 and 9?

Yes

5. Do you think that the size scales (shellfish (small), medium, and extensive), are appropriate?

Do not know

6. Which consenting option would be most appropriate for seaweed cultivation?

Option 2 – this brings decision making into line with other marine licensing for aquaculture. It provides an opportunity to consider the local context in detail, bringing to bear factors such as the undesignated historic environment (95%) which is protected through the Local Authority. It should be noted that Historic Scotland only involve themselves in the designated historic environment and that RCAHMS do not offer advice on site management. Such advice is available from Local Authority Archaeological Service and is routinely considered within the planning process.

7. Should guidance be developed for the harvesting of wild seaweed? If not, what (if any) alternative arrangements would you suggest?

It depends on the scale and the level of impact on the environment

8. Should the 1997 Act should be amended to provide the flexibility to farm other species or specifically named species? YES/NO

Do not know

9. Do you have any comments to make on the BRIA content?

These comments relate to Section 6.7 Cultural Heritage.

6.7.3 second line within the phrase “ad hoc discoveries of sites” add “underwater” ie: “ad hoc discoveries of underwater sites”. (Otherwise the statement is not true.) At the end of the second sentence insert “However, some Local Authorities (eg: Shetland, East Lothian, Dumfries and Galloway) and *since 1995...*”
“has” then becomes “have”

6.7.4 First sentence, second line, delete “unprotected” and replace with “undesigned”

6.7.5 Line one, delete “unprotected” and replace with “undesigned archaeological”

At the end of this sentence add “Many of these are recorded in Local Authority Historic Environment Records and receive a measure of protection through Scotland’s planning system.”

These small changes present a more accurate picture of the situation in Scotland. The document as it stands appears to be unaware of the important contribution which Local Authorities make to the protection of the Historic Environment.