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To: aquaculturereview
Subject: Aquaculture Consultation

Follow Up Flag: Follow up
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We would like to have the following submission considered by the Aquaculture Licensing Review Group.

- 1: It should be a requirement that a notice of intention to apply for a license be published at the time that an application is lodged with the Department so that communities can be as fully informed as possible in relation to the proposed development.
- 2: Consideration of applications within bays should be considered as part of an overall strategic management plan for a particular bay with consideration given to the intensity of proposed and existing development the location within the bay aside from the Appropriate Assessment taking account of existing uses of the bay by local communities and the overall amenity of the bay. I understand from the Department that legislation is required for marine spacial planning and if so this should be proceeded with without delay. It may be possible to legislate for foreshore spacial planning faster than the entire marine area upto the 200 mile limit.
- 3: A public notice of an application for a license should specify the exact location of the intended development particularly in light of the potential that an application could be in a large bay/area for example Lough Swilly and the definition of the application as 'on the shores of Lough Swilly' is clearly not adequate to inform the public of the exact location of the proposed development.
- 4: The notice should be published in a newspaper/publication with a wide circulation in the area in question rather than simply be available in the area. For example Local Authorities specify publications that have a circulation in an area for planning applications. There may be circumstances where a publication may have a county/area wide circulation but not be widely sold in a particular part of a county therefore while it may be available it is unlikely to be seen.
- 5: Having as much public consultation as possible will lead to a more robust system and greater public confidence in the licensing system as a whole.
- 6: The Department has indicated that the time for consideration of an application is between 43-81 weeks. This should be shorter if possible and placed on a statutory basis in order that applicants can have some certainty as to when they can expect a decision. If an Environmental Impact Statement is required provision can be made for an extension of the timeline.
- 7: Consideration should be given to making application system exclusively online. Reducing administration costs and validation issues. This would also allow for the rapid availability of application and submission documentation therefore improving public participation of the process.
- 8: A dedicated application browser should be developed to allow easier tracking of applications and subsequent submissions and determinations. (The EPA uses quite a good model on their website).
- 9: Significant dates such as public consultation periods should be clearly identified on any application browser interface without having to open documents and search for dates of publication of notices.
- 10: Although much of the marine based aquaculture industry's infrastructure is not physically connected to the shoreline and therefore is not in general subject to the provisions of the planning and development acts administered by the local authorities, the access and egress from these licensed facilities explicitly leads to intensification of use of *inter alia*, access infrastructure such as piers, rights of way (both public & private), paths and the local roads network. Therefore consideration should be given to having all activities that are subject to aquaculture licensing to require planning permission from the relevant local authority prior to the commencement of the licence application process. This would allow for a more strategic planned approach to development of the industry while balancing more effectively with other environmental, amenity and established uses especially the needs of local communities.

We look forward to seeing the outcome of the consultation process.

Is mise,

Thomas Pringle TD, Cllr Michéal MacGiollaEaspuig and Cllr John Campbell.

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