

## CONSULTATION QUESTIONS

Please identify the main area of interest you identify with :

- |                               |                                     |
|-------------------------------|-------------------------------------|
| Nature Conservation           | <input type="checkbox"/>            |
| Fisheries                     | <input type="checkbox"/>            |
| Industry/Transport            | <input type="checkbox"/>            |
| Energy                        | <input type="checkbox"/>            |
| Aquaculture                   | <input type="checkbox"/>            |
| Recreation/tourism            | <input type="checkbox"/>            |
| Academic/scientific           | <input type="checkbox"/>            |
| Local authority               | <input checked="" type="checkbox"/> |
| Community group               | <input type="checkbox"/>            |
| Public sector/Regulatory body | <input type="checkbox"/>            |
| Local Coastal Partnership     | <input type="checkbox"/>            |

Other (Please state)

Comments

**Q1. Does the NMP appropriately guide management of Scotland's marine resources?**

Aberdeen City Council (the council) agrees that the NMP appropriately guides management of Scotland's marine resources.

**Q2. Does the NMP appropriately set out the requirement for integration between marine planning and land use planning systems?**

The council agrees that the NMP makes clear the need for integration between marine planning and land use planning.

**Q3. Does the NMP appropriately guide development of regional marine planning? What, if any, further guidance is required for regional marine planners in terms of implementation and how to interpret the NMP?**

At the moment, it is clear what will be expected of local authorities in terms of the NMP. However, what is actually required to achieve its implementation is not clear. It is hoped that future guidance plus representation in Marine Planning Partnerships will help with this.

**Q4. The Marine Regional Boundaries Consultation proposed that in addition to regional marine planning, further integrated management of key marine areas would be achieved by designating the Pentland Firth; the Minches and the mouth of the Clyde as Strategic Sea Areas.**

**Should the NMP set out specific marine planning policies for Strategic Sea Areas?**

The council is unable to comment on this since SSA's will not directly affect ACC.

**Q5. Are the objectives and policies in the NMP appropriate to ensure they further the achievement of sustainable development, including protection and, where appropriate, enhancement of the health of the sea?**

Yes.

**Q6. Chapter 3 sets out strategic objectives for the National Marine Plan and Chapters 6 – 16 sets out sector specific marine objectives.**

**Is this the best approach to setting economic, social and marine ecosystem objectives and objectives relating to the mitigation of and, adaptation to climate change?**

Yes.

**Q7. Do you have any other comments on Chapters 1 – 3?**

No further comments.

### **General Planning Policies**

**Q8. Are the general policies in Chapter 4 appropriate to ensure an approach of sustainable development and use of the marine area? Are there alternative policies that you think should be included? Are the policies on integration with other planning systems appropriate? A draft circular on the integration with terrestrial planning has also been published - would further guidance be useful?**

The general policies in Chapter 4 appear to be appropriate. There are no other suggested alternative policies.

**Q9. Is the marine planning policy for landscape and seascape an appropriate approach?**

Yes.

**Q10. Are there alternative general policies that you think should be included in Chapter 4?**

No.

### **Guide to Sector Chapters**

**Q11. Do you have any comments on Chapter 5?**

**Are there other sectors which you think should be covered by the National Marine Plan?**

No comments on Chapter 5.

### **Sea Fisheries**

**Q12. Do you have any comments on Sea Fisheries, Chapter 6?**

The council has no comments to make on sea fisheries.

**Q13. Are there alternative planning policies that you think should be included in this Chapter?**

No.

### **Aquaculture**

**Q14. Does Chapter 7 appropriately set out the relationship between terrestrial and marine planning for Aquaculture? Are there any planning changes which might be included to optimise the future sustainable development of aquaculture?**

No further suggested changes to be included.

**Q15. Do you have any comments on Aquaculture, Chapter 7?**

No further comments.

**Q16. Are there alternative planning policies that you think should be included in this Chapter?**

No further alternative planning policies suggested.

### **Wild Salmon and Migratory Fish**

**Q17. Do you have any comments on Wild Salmon and Migratory Fish, Chapter 8?**

No comments on Wild Salmon and Migratory Fish.

**Q18. Are there alternative planning policies that you think should be included in this Chapter?**

No further alternative planning policies suggested.

### **Oil & Gas**

**Q19. Do you have any comments on Oil and Gas, Chapter 9?**

There is no specific consideration of potential oil spills, and depending on the scale, the resulting impact on the environment and potential claims for

compensation. Should there be the inclusion of relevant environmental benchmarking around the UK coastline, and if so, how might this work in this context?

**Q20. Are there alternative planning policies that you think should be included in this Chapter?**

No further alternative planning policies suggested.

### **Carbon Capture & Storage (CCS)**

**Q21. Do you have any comments on Carbon Capture and Storage, Chapter 10?**

No comments.

**Q22. Are there alternative planning policies that you think should be included in this Chapter?**

No further alternative planning policies suggested.

### **Offshore Renewable Energy**

**Q23. Should the NMP incorporate spatial information for Sectoral Marine Plans?**

Yes. This will ensure that data for each relevant site is available allowing informed decisions and thus appropriate development in Scottish waters. However, who will be responsible for providing up-to-date spatial information?

**Q24. Do you have any comments on Offshore Renewable Energy, Chapter 11?**

No further comments.

**Q25. Are there alternative planning policies that you think should be included in this Chapter?**

No further alternative planning policies suggested.

### **Recreation and Tourism**

**Q26. Do you have any comments on Recreation and Tourism, Chapter 12?**

While it is mainly understood that a healthy natural environment is important

for tourism, the council feels that there is a missing objective for the promotion of sustainable tourism which should include the keys for economic, social and marine ecosystem. Tourism, just as any other sector, should be encouraged in a sustainable way. While direct impacts to marine ecosystems may be less than other sectors, there are still cumulative effects with other sectors to consider.

**Q27. Are there alternative planning policies that you think should be included in this Chapter?**

No further alternative planning policies suggested.

### **Transport (Shipping, Ports, Harbours & Ferries)**

**Q28. Should the NMP specifically designate national significant ports/harbours as described in Chapter 13: Marine Planning Policy Transport 2?**

The NMP should designate national significant ports and harbours. This will ensure links with major developments included in the next National Planning Framework. There is no mention of the proposed Aberdeen Harbour development. This should be included in the NMP.

**Q29. Do you have any comments on Transport, Chapter 13?**

While there is an objective to encourage and support development of port and harbour infrastructure, the Council would like to see more emphasis on improving the infrastructure to allow better connections to ports through various types of transport and making better links with the surrounding areas. In the case of Aberdeen, the vision would be to turn the train and bus stations along with the ferry terminals into a transport hub through improved links. This would further help strengthen the links between marine and terrestrial planning.

**Q30. Are there alternative planning policies that you think should be included in this Chapter?**

No further alternative planning policies suggested.

### **Telecommunication Cables**

**Q31. Do you have any comments on telecommunications, Chapter 14?**

No comments.

**Q32. Are there alternative planning policies that you think should be included in this Chapter?**

No further alternative planning policies suggested.

### **Defence**

**Q33. Do you have any comments on Defence, Chapter 15?**

No comments.

**Q34. Are there alternative planning policies that you think should be include in this Chapter?**

No further alternative planning policies suggested.

### **Aggregates**

**Q35. Do you have any comments on Aggregates, Chapter 16?**

No further comments.

**Q36. Are there alternative planning policies that you think should be included in this Chapter?**

No further alternative planning policies suggested.

### **Business and Regulatory**

**Q37. Please tell us about any potential economic or regulatory impacts, either positive or negative, that you think any or all of the proposals in this consultation may have.**

The council has no further comments to add.

### **Equality**

**Q38. Do you believe that the creation of a Scottish National Marine Plan discriminates disproportionately between persons defined by age, disability, sexual orientation, gender, race and religion and belief?**

Yes  No

**Q39. If you answered yes to question 23 in what way do you believe that the creation of a Scottish National Marine Plan is discriminatory?**

N/A

**Sustainability Appraisal**

**Q40. Do you have any views/comments on the Sustainability Appraisal carried out for the NMP?**

No comments.



## Plan Development

1. Do you agree with the approach (outlined in Section 3 of the Sectoral Marine Plans) used to develop the Plans?

Yes  No

Please explain:

The Plans should be reviewed in line with the National Marine Plan. The suggestion would be to use the same mechanism for gathering future data as has been used for gathering current data. Could the data be reviewed every 5 years in line with the plan? Setup a central records centre for new information, including information gathered as part of surveys for individual projects. The Plans Review Steering Group should include representatives from all key stakeholders of the marine environment.

2. Do you have any views on the findings of the Sustainability Appraisal Report? Do you think that all the social, economic and environmental effects (positive and negative) have been identified? Are there other issues that should be taking into account in the preparation of the Final Draft Plans?

There are no comments to make on this particular subject.

3. The SEA has identified a range of potential effects from the Draft Plans. Measures for the mitigation of these effects have been identified in the SEA environmental report. Do you have any views on these findings? Do you think that the proposed mitigation measures will be effective? Do you have any additional suggestions?

There are no comments to make on this particular subject.

4. The Socio-economics Report has identified a range of potential impacts on existing sea users. Do you have any views on these findings? Do you think that the proposed mitigation measures will be effective? Do you have any additional suggestions?

There are no comments to make on this particular subject.

5. Taking into account the findings from the technical assessments, do you have views on the scale and pace of development that could be sustainably accommodated in Scottish Waters??

There are no comments to make on this particular subject.

**6. Are there aspects of the Draft Plans that you believe should be improved? Are there any aspects you believe should be taken forward differently?**

**Please explain any reasons for your answer and provide details of any suggested improvements:**

There are no comments to make on this particular subject.

**7. Do you believe an appropriate balance, between tackling climate change, maximising opportunities for economic development and dealing with environmental and commercial impacts been achieved in the Draft Plans?**

Yes  No

**Please explain:**

No further comments to make on this particular subject.

#### **Draft Plan options**

**8. The Draft Plan for Offshore Wind Energy proposes 10 Draft Plan options. What are your views on the Offshore Wind Draft Plan options? Are they in the correct place? Are there reasonable alternatives that should be considered?**

**Please indicate which proposed Draft Plan option(s) you are commenting on using the relevant indicator (i.e. OWN1)**

The council supports OWNE1 which is the nearest and most relevant development zone to the council. This option appears to be in its correct place. The council is unable to comment on the other locations. No other reasonable alternatives have been considered.

**9. The Draft Plan for Wave Energy proposes 8 Draft Plan options. What are your views on the Wave Draft Plan options? Are they in the correct place? Are there reasonable alternatives that should be considered?**

**Please indicate which proposed Draft Plan option(s) you are commenting on using the relevant indicator (i.e. WN1)**

The Wave Energy proposals do not directly affect the council and is, therefore, not a position to comment.

**10. The Draft Plan for Tidal Energy proposes 10 Draft Plan options. What are your views on the Tidal Draft Plan options? Are they in the correct place? Are there reasonable alternatives that should be considered?**

**Please indicate which proposed Draft Plan option(s) you are commenting on using the relevant indicator (i.e. TN1)**

N/A

**11. Do you believe any draft plan options be removed from the Draft Plans for Wind, Wave and Tidal Energy?**

Yes  No

**If Yes, please indicate which proposed Draft Plan options you believe should be removed (using the relevant indicator), and explain why:**

N/A

### **Plan Implementation and Review**

**12. The Plans, once implemented, will be reviewed to take account of actual development and increasing knowledge of development factors. How often do you believe should this be done and why? Who do you believe should be involved in the Plans Review Steering Group, to oversee the review process?**

Please refer to answer for question 1.

### **Strategic Environmental Assessment**

**13. To what extent does the Environmental Report set out an accurate description of the current environmental baseline? Please also provide details of any additional relevant sources.**

There are no comments to make on this subject.

**14. Do you agree with the predicted environmental effects of the plans as set out in the Environmental Report?**

There are no comments to make on this subject.

**15. Do you agree with the recommendations and proposals for mitigation of the environmental effects set out in the Environmental Report?**

There are no comments to make on this subject.

**16. Are you aware of any additional on-going research or monitoring that may help to fill gaps in the evidence base, particularly relating to the marine environment and its interactions with renewable energy devices? Please give details of additional relevant sources.**

No.

**17. Are you aware of any further environmental information that will help to inform the environmental assessment findings?**

No.

#### **Additional comments**

**18. Do you have any other comments you wish to make of the Plans and / or the related assessments?**

The Council would be keen to see an inclusion or mention of the European Offshore Wind Deployment Centre (EOWDC) which was consented by the Scottish Government in March 2013.

**1. Do you support the development of an MPA network in Scotland's Seas?**

Yes  No

The Council supports the need and development of an MPA network. Although there are no proposed designations off the Aberdeen coast, the Council fully supports the current proposals plus the future consultations on the area identified for further study.

**Individual possible Nature Conservation MPAs**

**2. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Clyde Sea Sill* possible Nature Conservation MPA?**

Designation: Yes  No

N/A

Management Options: Yes  No

N/A

Socioeconomic Assessment: Yes  No

N/A

All of the above: Yes  No

N/A

**3. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *East Caithness Cliffs* possible Nature Conservation MPA?**

Designation:

Yes  No

N/A

Management Options:

Yes  No

N/A

Socioeconomic Assessment:

Yes  No

N/A

All of the above:

Yes  No

N/A

**4. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *East of Gannet and Montrose Fields* possible Nature Conservation MPA?**

Designation:

Yes  No

N/A

Management Options:

Yes  No

N/A

Socioeconomic Assessment:

Yes  No

N/A

All of the above:

Yes  No

N/A

**5. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Faroe-Shetland sponge belt* possible Nature Conservation MPA?**

Designation: Yes  No

N/A

Management Options: Yes  No

N/A

Socioeconomic Assessment: Yes  No

N/A

All of the above: Yes  No

N/A

**6. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Fetlar to Haroldswick* possible Nature Conservation MPA?**

Designation: Yes  No

N/A

Management Options: Yes  No

N/A

Socioeconomic Assessment: Yes  No

N/A

All of the above: Yes  No

N/A

**7. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Hatton-Rockall Basin* possible Nature Conservation MPA?**

Designation: Yes  No

N/A

Management Options: Yes  No

N/A

Socioeconomic Assessment: Yes  No

N/A

All of the above: Yes  No

N/A

**8. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Loch Creran* possible Nature Conservation MPA?**

Designation: Yes  No

N/A

Management Options: Yes  No

N/A

Socioeconomic Assessment: Yes  No

N/A

All of the above: Yes  No

N/A

**9. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Loch Sunart* possible Nature Conservation MPA?**



Designation: Yes  No

N/A

Management Options: Yes  No

N/A

Socioeconomic Assessment: Yes  No

N/A

All of the above: Yes  No

N/A

**10. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Loch Sunart to the Sound of Jura* possible Nature Conservation MPA?**

Designation: Yes  No

N/A

Management Options: Yes  No

N/A

Socioeconomic Assessment: Yes  No

N/A

All of the above: Yes  No

N/A

**11. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Loch Sween* possible Nature Conservation MPA?**

Designation:

Yes  No

N/A

Management Options:

Yes  No

N/A

Socioeconomic Assessment:

Yes  No

N/A

All of the above:

Yes  No

N/A

**12. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Lochs Duich, Long and Aish* possible Nature Conservation MPA?**

Designation:

Yes  No

N/A

Management Options:

Yes  No

N/A

Socioeconomic Assessment:

Yes  No

N/A

All of the above:

Yes  No

N/A

**13. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Monach Isles* possible Nature Conservation MPA?**

Designation:

Yes  No

N/A

Management Options:

Yes  No

N/A

Socioeconomic Assessment:

Yes  No

N/A

All of the above:

Yes  No

N/A

**14. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Mousa to Boddam* possible Nature Conservation MPA?**

Designation:

Yes  No

N/A

Management Options:

Yes  No

N/A

Socioeconomic Assessment:

Yes  No

N/A

All of the above:

Yes  No

N/A

**15. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *North-east Faroe Shetland Channel* possible Nature Conservation MPA?**

Designation: Yes  No

N/A

Management Options: Yes  No

N/A

Socioeconomic Assessment: Yes  No

N/A

All of the above: Yes  No

N/A

**16. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *North-west Orkney* possible Nature Conservation MPA?**

Designation: Yes  No

N/A

Management Options: Yes  No

N/A

Socioeconomic Assessment: Yes  No

N/A

All of the above: Yes  No

N/A

**17. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *North-west sea lochs and Summer Isles* possible Nature Conservation MPA?**

Designation:

Yes  No

N/A

Management Options:

Yes  No

N/A

Socioeconomic Assessment:

Yes  No

N/A

All of the above:

Yes  No

N/A

**18. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Noss Head* possible Nature Conservation MPA?**

Designation:

Yes  No

N/A

Management Options:

Yes  No

N/A

Socioeconomic Assessment:

Yes  No

N/A

All of the above:

Yes  No

N/A

**19. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Papa Westray* possible Nature Conservation MPA?**

Designation:

Yes  No

N/A

Management Options:

Yes  No

N/A

Socioeconomic Assessment:

Yes  No

N/A

All of the above:

Yes  No

N/A

**20. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Rosemary Bank Seamount* possible Nature Conservation MPA?**

Designation:

Yes  No

N/A

Management Options:

Yes  No

N/A

Socioeconomic Assessment:

Yes  No

N/A

All of the above:

Yes  No

N/A

**21. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Small Isles* possible Nature Conservation MPA?**

Designation:

Yes  No

N/A

Management Options:

Yes  No

N/A

Socioeconomic Assessment:

Yes  No

N/A

All of the above:

Yes  No

N/A

**22. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *South Arran* possible Nature Conservation MPA?**

Designation:

Yes  No

N/A

Management Options:

Yes  No

N/A

Socioeconomic Assessment:

Yes  No

N/A

All of the above:

Yes  No

N/A

**23. Do you have any comments on the case for designation, management options and socioeconomic assessment for *The Barra Fan and Hebrides Terrace Seamount* possible Nature Conservation MPA?**

Designation:

Yes  No

N/A

Management Options:

Yes  No

N/A

Socioeconomic Assessment:

Yes  No

N/A

All of the above:

Yes  No

N/A

**24. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Turbot Bank* possible Nature Conservation MPA?**

Designation:

Yes  No

N/A

Management Options:

Yes  No

N/A

Socioeconomic Assessment:

Yes  No

N/A

All of the above:

Yes  No

N/A

**25. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Upper Loch Fyne and Loch Goil* possible Nature Conservation MPA?**

Designation:

Yes  No



N/A

Management Options:

Yes  No

N/A

Socioeconomic Assessment:

Yes  No

N/A

All of the above:

Yes  No

N/A

**26. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *West Shetland Shelf (formerly Windsock)* possible Nature Conservation MPA?**

Designation:

Yes  No

N/A

Management Options:

Yes  No

N/A

Socioeconomic Assessment:

Yes  No

N/A

All of the above:

Yes  No

N/A

**27. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Wyre and Rousay Sounds* possible Nature Conservation MPA?**

Designation:

Yes  No

N/A

Management Options:

Yes  No

N/A

Socioeconomic Assessment:

Yes  No

N/A

All of the above:

Yes  No

N/A

### **Choices to represent features in the MPA Network**

**28. Recognising the scientific advice from JNCC included alternatives for representing offshore subtidal sands and gravels, ocean quahog and shelf banks and mounds in the Southern North Sea, do you have a preference or comments on the following combinations to represent these features, bearing in mind Turbot Bank will need to be designated to represent sandeel in this region:**

Firth of Forth Banks Complex

Turbot bank and Norwegian Boundary Sedimentary Plain

Or Firth of Forth Banks Complex, Turbot bank and Norwegian Boundary Sedimentary Plain

No comment to make on this subject.

**29. Do you have any comments on the case for designation, management options and socioeconomic assessments for the preference you have indicated in the question above, regarding alternatives for representing offshore subtidal sands and gravels, ocean quahog and shelf banks and mounds in the Southern North Sea?**

Yes  No

N/A

**30. Recognising the scientific advice from JNCC included alternatives for representing the burrowed mud feature in the Fladens, do you have a preference or comments on the following combinations to represent these features, bearing in mind the part of Central Fladen (known as Central Fladen (Core)) containing tall seapen (Funiculina quadrangularis) will need to be designated to represent tall seapen in this region:**

Central Fladen pMPA only

The tall sea-pen component of Central Fladen, plus Western Fladen

Or the tall sea-pen component of Central Fladen, plus South-East Fladen.

No comment.

**31. Do you have any comments on the case for designation, management options and socioeconomic assessments for the preference you have indicated in the question above, regarding alternatives for representing the burrowed mud feature in the Fladens?**

Yes  No

N/A

**32. Recognising the scientific advice from JNCC included alternatives for representing offshore subtidal sands and gravels, offshore deep sea mud, and burrowed mud in OSPAR Regions III and V, do you have a preference or comments on the following combinations to represent these features:**

South-West Sula Sgeir and Hebridean slope

Or Geikie slide and Hebridean slope

No comment.

**33. Do you have any comments on the case for designation, management options and socioeconomic assessments for the preference you have indicated in the question above, regarding alternatives for representing offshore subtidal sands and gravels, offshore deep sea mud, and burrowed mud in OSPAR Regions III and V?**

Yes  No

N/A

**Q1. Do you agree with the recommended list of Priority Marine Features as the basis for targeting future marine conservation action in Scotland's seas?**

**If your response includes a suggestion to amend the list, please indicate the specific species and habitats that your comments apply to and, where possible, provide or reference any evidence or data sources which have influenced your comments.**

Yes  No

N/A

**General**

**Q2. Are there other issues that have not been highlighted in this consultation that you would like to mention?**

Yes  No

How often is 'periodic' in terms of the periodic review of the list?

**1. Is the Draft Circular on the relationship between the land use and marine planning systems helpful?**

Yes.

**Q2. Does the Draft National Marine Plan appropriately set out the requirement for integration between marine planning and land use planning systems?**

It appears to be reasonably set out. Although it is not entirely clear what the roles will be for both marine and terrestrial planning when new harbours are being considered, as is currently under consideration in Aberdeen. When determining an application for a new harbour it is important that consent is based on the total impact of the project on both the terrestrial and marine environments. Paragraph 58 onwards covering Ports and Harbours could make clearer the process for new harbours and how this will be taken into account.

**Q3. Do you agree with the suggestions for good practice in paragraphs 30-39, and do you have any other suggestions?**

It is agreed. No further suggestions made.