



CONSULTATION ON MARINE PROTECTED AREAS

SUBMISSION BY THE SCOTTISH PORTS COMMITTEE OF THE BPA

This response is made on behalf of the Scottish Ports Committee of the British Ports Association, a Committee which represents the overwhelming majority of port activity in Scotland. All the members of the Committee have a self evident interest in this consultation and in the process and potential impacts of site designation.

The port industry is fundamental to the Scottish economy, not only in terms of cargo handling and import and export trade, but also in terms of the support provided to vital industries; offshore oil and gas, offshore renewables, fishing, leisure and cruise. Ports also provide key links for lifeline services. A study was conducted by Oxford Economics on behalf of Maritime UK in 2012 which showed that the total Gross Value Added (GVA) for ports in Scotland was greater than for any other part of the UK, amounting to £3.2bn in 2011. The ports industry is also hugely significant for employment with a total of 31,000 direct employees, 15,000 indirect employees and 10,000 employees resulting from induced effects. This amounted to just over 2% of total employment in Scotland. The offshore renewables industry in particular is a fundamental part of Scotland's economic and environmental objectives and has shown strong growth over the past few years; there are still a number of planned potential developments in connection with this industry.

Much of the consultation is concerned with the specifics of individual sites and we have advised members to respond individually to the data provided for its relevance and accuracy. The purpose of this response is to raise a number of more general issues about the potential impact on the industry as a whole, not only in relation to these first designations, but about the impact of management measures and possible future designations.

We note from the description in the opening paragraphs of the consultation the hugely valuable resource that the marine environment offers; we support the need for pragmatic and sensible measures which bring into play full consideration of the economic and socio consequences of those measures. These considerations are a central part of the UK Marine Policy Statement on which the National Marine Policy Statement is based and indeed which all policies in relation to MPAs will need to reflect. The UK Statement identifies a number of high level marine objectives. These include the need for infrastructure "to support and promote safe, profitable and efficient marine businesses" and that the marine environment and its resources "are used to maximize sustainable activity, prosperity and opportunities for all, now and in the future". Members of the Scottish Ports Committee already have widely ranging environmental responsibilities, many of them in

association with Natura 2000 and other heavily protected sites and are strongly committed to environmental protection and improvement.

We welcome the fact that the selection of MPAs so far has largely managed to locate sites away from port areas. At the same time we note that some sites could possibly affect some “minor” ports (para 4.2.38) and although “minor” is not defined, these will require careful monitoring to ensure that commercial activity, which may have major implications for a local area, is not affected.

The Sustainability Appraisal Report (para 4.2.30) also rightly highlights the potential extra responsibilities and costs that the designation of a site might create. These include possible additional assessment and survey costs in connection with dredging disposal, additional mitigation measures for new developments, costs associated with delays because of a slower consenting process and potential loss of investor confidence. All these could play their part and in particular the loss of investor confidence, or planning blight, could be a feature particularly affecting offshore renewables. Potential investors could be deterred by the extra management measures involved in an MPA site. We are also very conscious that the current list of sites, with potentially 33 to be designated following the consultation, could be expanded in the future and that it is open to a range of organizations to propose new sites.

We welcome the level of detail provided on potential management measures. Our overall impression is that the sites will require minimal new management measures, and we support this as a contribution to maintaining the status quo in terms of activity but at the same time protecting the environmental value of the site. It would be helpful to have more information about how any changes to management measures would be consulted on.

We therefore support the identification of MPAs, at the same time recognizing that this is a new initiative with impacts and costs dependent on management measures remaining largely unchanged. We look to the Marine Strategy Forum to actively monitor these aspects and link between policy makers and commercial operators.

David Whitehead OBE
Director

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