

CONSULTATION QUESTIONS

Please identify the main area of interest you identify with :

- Nature Conservation
- Fisheries
- Industry/Transport
- Energy
- Aquaculture
- Recreation/tourism
- Academic/scientific
- Local authority
- Community group
- Public sector/Regulatory body
- Local Coastal Partnership

Other (Please state)

Comments

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

Comments

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

Comments

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?

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?

Comments

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?

Comments

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?

Comments

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

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?

Comments

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

Comments

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

Comments

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?

Comments

Sea Fisheries

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

Comments

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

Comments

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?

Comments

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

Comments

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

Comments

Wild Salmon and Migratory Fish

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

Comments

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

Comments

Oil & Gas

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

Comments

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

Comments

Carbon Capture & Storage (CCS)

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

Comments

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

Comments

Offshore Renewable Energy

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

Comments

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

Comments

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

Comments

Recreation and Tourism

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

Comments

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

Comments

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?

We understand that many are uneasy with the designation of nationally significant ports. We note that 'major ports' are already delineated in DfT statistics; it could be confusing to have another form of designation.

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

We are concerned that the plan suggests that ports will exercise their jurisdiction in accordance with the Marine Plan. Ports have jurisdiction and powers to ensure the safety of navigation, it is not appropriate for the Marine Plan to interfere with this as there could be consequences for the safety of navigation. Furthermore, in the process of working towards the Marine (Scotland) Bill and the drafting and approval of the Act, we were repeatedly reassured by Marine Scotland (and predecessor bodies) that there would be no interference with port and harbour authority powers and jurisdiction.

We appreciate the intentions of the objectives of the Transport chapter, we believe these could be refined and this was discussed with Marine Scotland in a meeting with a number of ports and harbour authorities on the 27th of September. Our advice would be to focus on the key points – ensuring safety of navigation and that the plan (and any subsequent regional marine plan) must not impinge our ability to deliver this. Tourism potential in ports, should be captured by the 2nd and 3rd objectives (which appear to repeat each other) and could perhaps be more general in supporting the growth and development of infrastructure to maintain and thereby enhance trade, whether the passenger, cargo or service provision. We disagree with the final objective: the provision of shore based power in ports. This (as covered at the above noted meeting) is not practical in port locations, due to the grid infrastructure in and around most ports. To provide power in the required quantities

will require significant investment in infrastructure both within the ports and in the electricity networks that supply them, often for considerable distances. Such upgrades cannot be funded by the users, given the duration and profile of the electrical draw. Furthermore, there are no ports in Scotland with air quality issues caused by ships, there are ports adjacent to air quality management areas, where the elevated levels of NO_x or SO_x is caused by nearby industrial facilities, urban areas and/or traffic. Should shore based infrastructure be installed, any resultant improvements in air quality would be so small as to not be discernible.

We note that ‘Sullon Voe, Flotta and Aberdeen are of particular importance’ to the oil and gas industry. Given the Forth handles more oil and gas cargo than any other Scottish Port and also contains the Grangemouth Refinery and Petrochemical plant, it was surprising that there was no mention of its importance, or indeed the importance of the Port of Dundee as an oil port and oil support facility.

We note that in relation to tourism and recreation there is the statement that ‘in some cases denied access for safety purposes can have negative impacts for an activity and a community’. We are not sure what the motivation behind this point is, but it is critical that Marine Scotland (and the wider community) understand that commercial ports are places where large pieces of machinery operate, materials are moved, often in bulk and it may not be safe to operate with public access. There are also reasons of international, European and UK security legislation for access being prohibited, in some cases.

We note that at least one of the policies refer to complying with a particular piece of legislation. This would appear unnecessary as surely we are all under a duty to comply with all relevant legislation, not just one specific piece of legislation.

The Future – Transport

The cited trend for larger vessels needing deeper and wider channels is referred to. Whilst there are some commodities at Scottish Ports which are handled in the very largest ships (particularly oil and gas), the size of vessel is driven by the required volumes and frequency of access to the market required. For example, although the Port of Grangemouth can take container vessels of a size roughly equivalent to c. 1800 twenty foot equivalent units (TEU), an assessment of vessel size calling at the port was conducted for the month of January 2010 – over that month the mean vessel size calling at the port was 566 TEU. Assuming the volume (market) remains the same, the larger the vessel, the less frequent the service and in a recent report by Fisher Associates for Scottish Enterprise, it was stated that exporters in Scotland wanted a frequent service rather than larger vessels. Furthermore, we are not convinced by the assumption that ports on the east coast of Scotland will become European Hub Ports following the opening of the North West Passage. Scotland does not have the population to sustain such facilities, currently such hub ports are in the Southern North Sea, where the major EU population centres are.

This section has a further mention of shore based power; the practicality of this is questioned above.

A more general comment is that much of this document is highly aspirational, but there is no comment on the practical delivery of such aspirations.

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

Comments

Telecommunication Cables

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

Comments

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

Comments

Defence

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

Comments

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

Comments

Aggregates

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

Comments

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

Comments

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.

Comments

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?

Comments

Sustainability Appraisal

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

Comments