

## 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?**

Yes. The Council welcomes the publication of the National Marine Plan which promotes a positive approach towards the management and development of Scotland's marine resources.

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

Whilst it is recognised that both the Marine Plan and the NPF have been developed through separate processes it is important to ensure clarity of policy and objectives in the final documents. Issues that are covered jointly, such as grid enhancements should be presented in a similar and consistent way.

Similarly the mechanisms for the integration of marine and terrestrial at local level will require to be developed locally with stakeholders with consistency in policy objectives in areas such as renewable energy, energy investment, flood defence proposals, port investment, aquaculture, public access and waste water planning, landscape and seascape will be necessary.

This would highlight the need to advance the rollout of statutory Regional Marine Plans developed in conjunction with Marine Regional Partnerships and terrestrial agencies.

**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?**

The plan's outcomes encapsulated in the vision for the marine environment and the strategic objectives provide an appropriate framework within which Regional Marine Plans can be developed. The ecosystem services approach adopted in the plan is welcomed.

The document sets an appropriate balance between national priorities and regional interests.

The Council would however request further clarity on the content of the regional plans, particularly in respect of reserved matters.

Within the Clyde there are a number of strategic matters, such as defence activities which will require to be properly integrated within a future marine regional plan.

We would welcome a clear timetable for the "roll out" of plans to ensure adequate resources are available within local authorities to engage meaningfully in its preparation.

The final document could however be refined to confirm national issues and those which marine plans should consider as a priority. cf NPF3

**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 are of the view that a further designation may cause an additional layer of bureaucracy. Whilst it is recognised that there may be important issues in the proposed "Strategic Sea Area" at the mouth of the

Clyde, these issues can be adequately dealt with through textual/mapping guidance within the final NMP. The Council are of the view that issues can be addressed by adopting good planning practice and consultation procedures during the preparation of a regional Clyde marine plan making the designation of a strategic sea area unnecessary.

**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 -however resources to monitor progress and impacts (negative and positive) will be required.

**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?**

It is recognised that there are a number of ways which the document could be structured cf NPF 3. The “sector approach” has the advantage that it is logical and makes it easier for stakeholders to identify relevant policies.

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

South Ayrshire welcomes this National Marine Plan. It gives direction and provides a framework for sustainable economic development.

The Council welcomes the aspirations for the marine environment as enshrined within the “vision”. The Council supports the strategic objectives set out in the document.

The plan when “rolled out” through regional marine plans developed through local involvement and public consultation should provide a sound framework for sustainable economic investment and good future decision making.

In the implementation phase of the plan and when considering marine licence applications and renewable energy schemes it is important that the decision making is transparent and that information is readily available and shared between planning agencies and local communities. The terrestrial planning systems offers good practice in this regard.

Map 1 is not correct. The southern boundary of Clyde Marine Region has been subject to previous consultation and agreed.

## 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?**

Policies are relatively comprehensive.

Policy GEN 2 is welcomed.

Further clarification required in the interoperation of GEN 4 - scenario mapping and what this may encompass.

GEN 14 and the reference to the European landscape Convention is welcomed- however the text could be strengthened to recognise the contribution regional/local landscape designations, promoted through the development plan, play in supporting the tourism sector and contributing to a sense of place.

Local landscapes support national landscapes, so the contribution that these make to the national as well as local economy needs acknowledgement and protection.

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

Yes – The Council welcomes this approach.

Given the significance of landscape and seascape to the local economy of South Ayrshire the Council would welcome the **statutory opportunity** to be informed and comment on relevant offshore proposals see previous comment. This would include proposals within authorities which share a common sea boundary.

**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

### **Sea Fisheries**

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

South Ayrshire welcomes policies which increase catch value whilst protecting the ecosystems. The intention of the government to test practical measures which can contribute toward the restoration of the Clyde Marine Ecosystem through the "Clyde 2020" programme is welcomed.

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

We are keen to ensure any new European Fisheries policies or marine protection measures are developed and implemented with a clear understanding of their implications. This will require effective monitoring to be agreed.

### **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?**

Yes

No comment

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

None

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

No

**Wild Salmon and Migratory Fish**

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

No

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

None

**Oil & Gas**

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

None

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

No

**Carbon Capture & Storage (CCS)**

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

No

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

None

**Offshore Renewable Energy**

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

Yes In particular with regard to large scale projects which cross Scottish Marine Regions.

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

There is a need to ensure consistency in the mapping of issues within NPF3 and the Marine Plan- cf Map15/Map 14. NMP and Map3/Map5 NPF3

This will clarify future investments decisions and the timescales within which decisions will be taken.

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

No

### **Recreation and Tourism**

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

The Council welcomes the seven policies in this chapter. The final plan could however make greater reference to National Tourism Plan. Reference in this section to national priorities in respect of coastal path networks and “blue” recreational routes could be made. There is significant economic potential in developing these important recreational and access opportunities.

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

No

### **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 Council supports the policies in this chapter and particularly welcomes the guidance in Transport 2 as it relates to ports and harbours. It is crucial that there is no restriction on the operation of national or regionally important ports. The Council welcomes the flexibility offered to RMP through this policy framework.

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

Further guidance would be welcome to clarify the management of shipping in confined and ecologically sensitive waters to resolve potential conflict.

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

No

### **Telecommunication Cables**

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

The four policies in this section are supported. Policy 4 however should reflect the interests of the local development plan in addition to national guidance.

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

No

### **Defence**

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

Greater guidance is required for Regional Marine Plans with respect to reserved matters.

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

No

### **Aggregates**

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

Whilst the report does not identify marine aggregate extraction within the Firth of Clyde and historically this has been small in other parts of Scotland. Future extraction requirements may increase. The government in consultation with the industry should explore future demands and the opportunities to meet this requirement from terrestrial consented operations. Should mineral extraction be allowed there should be a bonding requirement undertaken by an independent expert to ensure any land based facilities are restored fully following the extractive period.



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

Given the current consented reserves onshore an additional policy promoting the use of consented reserves in preference to offshore extraction should be reflected through policy.

### **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.**

Overall the policies should have positive impacts however it will be the quality of the decisions and associated conditions that will determine if the NMP objectives are achievable.

### **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