

CONSULTATION QUESTIONS

Please identify the main area of interest you identify with :

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

Other (Please state)

No comments

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

The document provides a useful overview of all the relevant sectors to be considered in the subsequent preparation of Regional Marine Plans/Scottish Marine Regions (Clyde SMR for the North Ayrshire area) although recognition of our coastal communities requires to be more adequately addressed - see response to Q 11.

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

Yes, the NMP adequately sets out the context for the integration between marine and terrestrial planning which is dealt with separately by the Draft Circular.

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?

See response to Q 1 above

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?

No 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?

Yes; although recognition of our coastal communities requires to be more adequately addressed - see response to Q 11.

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?

The approach is considered appropriate. Also see response to Q 5.

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

No 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 direction of policy, approach and vision are considered broadly

acceptable. Further guidance to the Draft Circular may be required as and when local partnerships are formally established to address the preparation of SMRs.

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

Yes - this matter has already been addressed for the "Clyde" through the Firth of Clyde Forum after the preparation of their Clyde Pilot Marine Spatial Plan in 2010 when a study was commissioned to provide a strategic assessment of the coastal landscape and seascapes of the area. The study was carried out by Landscape Architects was completed earlier this year. The study provides an understanding of what is special about the landscape of the Firth of Clyde and the experience of this diverse seascape. It provides a landscape context for decision makers and suggests opportunities for landscape change. It is proposed that this study be adopted by the Council as non-statutory Supplementary Guidance to assist with decision making on all development proposals affecting the marine environment.

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

No 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?

It is suggested that marine education, science and research should be worthy of specific identification given its overall importance within North Ayrshire in terms of the development of marine tourism.

In addition, it is considered that recognition of our coastal communities requires to be more adequately addressed within the NMP. A generic policy within the Plan should seek to ensure that developments for marine based activities should generally be located and designed to accord with the Local Development Plan (and associated Supplementary Guidance on Design Guidance etc) as well as assist in delivering the aspirations of local communities. The need for detailed consultation with our coastal communities is also considered paramount.

Sea Fisheries

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

As part of the pan- Ayrshire Tourism Strategy 2012-17 being taken forward by Ayrshire Economic Partnership, the strategy indicates the importance of marine tourism especially marine education, science and education. The Clyde 2020 research project which is geared towards addressing the restoration of the Clyde marine ecosystem is a good example of this type of project and one which North Ayrshire Council would support.

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

No 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?

Yes. An Aquaculture policy has been included within our new Local Development Plan (LDP) which has recently been passed to Scottish Government (Directorate for Planning and Environmental Appeals) for external independent "Examination" by appointed Reporters. The Aquaculture policy is considered to be broadly in line with the strategic policies contained within the NMP.

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

No comments

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

No comments

Wild Salmon and Migratory Fish

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

See response to Q 14; the consideration of wild fish populations is included within the Aquaculture Policy within the new LDP for North Ayrshire Council.

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

No comments

Oil & Gas

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

Policy 2 for Oil and Gas indicates that decommissioning of oil and gas infrastructure must take place in line with standard practice, and as allowed by international obligations. However, no consideration is given to appropriate locations for the maritime decommissioning associated with defunct oil and gas platforms.

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

Hunterston represents an opportunity for maritime decommissioning associated with defunct oil and gas platforms. With existing deep water advantages together with associated port facilities including a railhead, it is well placed to capitalise on any opportunities for maritime decommissioning. On the basis of the above, Scottish Government are requested to consider within the National Marine Plan the recent request to Scottish Government in relation to NPF3 that Hunterston be promoted as a National Development designation for an "Energy Hub", with one of the elements covered by the designation being "maritime decommissioning associated with defunct oil and gas platforms".

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 comments

Offshore Renewable Energy

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

Yes this would be useful to give a flavour of the sectoral marine plans for offshore wind, wave and tidal energy although it is recognised these

aspects are covered in a separate consultation document.

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

See response to Q 25 below.

It is also considered that there is a need for enhanced cross referencing between the NRIP references within this Chapter and those specified within the Renewable Energy section of Chapter 13 and the related Map 19 for "NRIP sites and National Developments in Scotland" - see also response to Q 28.

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

Yes. As part of our response to NPF3, North Ayrshire Council believes it is essential that Scottish Government identify specific sites for onshore infrastructure for offshore renewable energy in order to guide investment and provide a framework for delivery of ambitious renewable energy generation targets.

Hunterston has been identified within the National Renewables Infrastructure Plan as a possible site for integrated manufacture of offshore turbines (and as outlined in Section 13 of the NMP). This has been affirmed by the Hunterston Competitive Advantage Study (HCAS), carried out by URS Consultants, who note the potential for Hunterston to act as a base for assembly of turbines and for construction of gravity base foundations. The Council believes that Hunterston is the best placed port in the west coast for future west coast arrays, which include five Round 3 Offshore projects which are at pre-consent stage. The HCAS confirms that several options are available to accommodate the infrastructure requirements necessary for foundation manufacturing and turbine assembly. Hunterston also has better road/rail connections and access to the labour market than other west coast ports, for example Kishorn.

The offshore turbine test bed at Hunterston, which was consented in 2012, is currently under construction and has raised the profile of Hunterston in the context of offshore renewables.

On the basis of the above, the Scottish Government are requested to consider within the National Marine Plan the recent request to Scottish Government that Hunterston be promoted as a National Development designation for an "Energy Hub", with one of the elements covered by the designation being "offshore renewables (wind, wave and/or tidal) manufacture, assembly, operation and maintenance.

Recreation and Tourism

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

The Ayrshire & Arran Tourism Strategy 2012-17 highlights the importance of marine leisure and recreation tourism and specifically sailing and

watersports. North Ayrshire is home to Scotland's biggest marinas, the Scottish Sailing Institute at Largs and the National Watersports Centre at Cumbrae. Our area is a centre for excellence in this sector with the provision of employment and offering future development opportunities in the expansion of the sector. These specific area attributes are of fundamental importance to the development of tourism sector within North Ayrshire but are not recognised within this Chapter and should be included.

It is also considered that Millport and Brodick should be recognised as potential cruise stops (need for cross referencing to Transport Chapter). See also the response to Q 29 on the importance of the ports/proposed improvements at Brodick and Millport to the island communities of Arran and Cumbrae respectively.

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

No 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?

Yes. As part of our response to NPF3, North Ayrshire Council believes it is essential that Scottish Government identify specific ports/harbours for onshore infrastructure for offshore renewable energy in order to guide investment and provide a framework for delivery of ambitious renewable energy generation targets.

Hunterston has been identified within the National Renewables Infrastructure Plan as a possible site for integrated manufacture of offshore turbines (and as outlined in Section 13 of the NMP). This has been affirmed by the Hunterston Competitive Advantage Study (HCAS), carried out by URS Consultants, who note the potential for Hunterston to act as a base for assembly of turbines and for construction of gravity base foundations. The Council believes that Hunterston is the best placed port in the west coast for future west coast arrays, which include five Round 3 Offshore projects which are at pre-consent stage. The HCAS confirms that several options are available to accommodate the infrastructure requirements necessary for foundation manufacturing and turbine assembly. Hunterston also has better road/rail connections and access to the labour market than other west coast ports, for example Kishorn.

The offshore turbine test bed at Hunterston, which was consented in 2012, is currently under construction and has raised the profile of Hunterston in the context of offshore renewables.

On the basis of the above, the Scottish Government are requested to consider within the National Marine Plan the recent request to Scottish Government that Hunterston be promoted as a National Development

designation for an “Energy Hub”, with the following elements covered by the designation:

- offshore renewables (wind, wave and tidal) assembly, manufacture, operation and maintenance;
- biomass bulk handling;
- maritime decommissioning associated with defunct oil and gas platforms;
- onshore infrastructure for electricity transmission;
- extended and/or new nuclear power production; and
- energy skills academy

It is also considered that there is a need for enhanced cross referencing between the Renewable Energy section within Chapter 13 and the related Map 19 for "NRIP sites and National Developments in Scotland" to NRIP references within Chapter 11 on Renewables - see also response to Q 24.

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

The port at Brodick is the lifeline ferry connection to the mainland of North Ayrshire and the pier is the subject of a proposed £18m redevelopment scheme to bring it up to present day standards to cater for the new demands of the tourist island. The Scottish Government Ferries Plan 2013-22 confirmed through its Investment Plan that proposals to upgrade Brodick Pier would be implemented by 2016. However, funding is not in place for the full project and the Council is currently heading a Redevelopment Group on the project with a number of other partners including Visit Arran and Highlands and Islands Enterprise to help deliver the project. This project is of critical importance to the area and the project, together with the need to secure adequate funding support from Scottish Government, requires to be recognised in the NMP.

Similarly the ferry connection between Largs and Millport on Cumbrae acts as a ferry lifeline for the residents of the island and its future prosperity. A feasibility study has recently been commissioned by the Council to investigate a number of options on how best to pursue the necessary redevelopment of Millport Pier with a view to securing the necessary funding to deliver maximum social and economic benefit to the island. This matter should be clearly recognised within the NMP.

Map 16 - the Campbeltown - Brodick - Ardrossan link is missing. The Troon link to Larne is also missing.

It is considered that Millport and Brodick should be recognised as potential cruise stops (need for cross referencing to Recreation & Tourism Chapter) - see also response to Q 26.

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

No comments

Telecommunication Cables

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

No comments. North Ayrshire Council have just received a screening opinion request from Marine Scotland in respect of BT PLC proposals for cable links Cumbrae to Largs; Bute to Cumbrae; Kintyre to Blackwaterfoot, Arran; and Corrie, Arran to Ardneil Bay, Portencross.

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

No comments

Defence

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

N comments

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

No comments

Aggregates

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

No comments

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

No 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.

No 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?

No comments