

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 type="checkbox"/> |
| Community group | <input type="checkbox"/> |
| Public sector/Regulatory body | <input type="checkbox"/> |
| Local Coastal Partnership | <input checked="" type="checkbox"/> |

Other (Please state)

Comments

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

The Firth of Clyde Forum (the Forum) welcomes the publication of the National Marine Plan (NMP) and feels that it sets a good agenda for the management of Scotland's marine resources.

The Forum welcomes the sectoral approach but feels it would be appropriate to avoid any sectors being dealt with in isolation (silo mentality), by encouraging the reader to view the document holistically. Emphasis at the beginning of the NMP that no decisions will be taken in isolation and that all sectors impact on one another to a greater or lesser extent would be useful. This holistic approach should be encouraged from the NMP through to the regional Marine Planning Partnerships (MPP) and the Regional Marine Plans (RMP).

The group is concerned about the ability of Marine Scotland to deliver against such an ambitious plan and would be keen to know more about the resources available to help deliver and monitor aspects of the NMP.

The Forum is keen to hear details of the timetable for the establishment of Marine Planning Partnerships and RMP across Scotland.

Whilst we assume the when the NMP refers to 'planning authorities' and 'planners', in chapter 4 in particular, it is referring to both marine and terrestrial authorities and planners, it would be useful to stipulate this at the outset.

The Forum is also keen to know how the NMP will interact with the new Marine Protected Areas network. Whilst the MPA network adds a useful level of detail it is difficult to know what the socio-economic impacts of the MPA network will be before the management options are agreed. However the Forum anticipates that this process and the day to day management will be intensive in terms of resources and would welcome early discussion about how this will impact at a regional planning level.

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

The Forum feels that the NMP clearly states this ambition. Clear reference is made to the Planning Circular, however further emphasis on the need for this integration between the terrestrial and marine planning systems could be helpful in the sector chapters. The Forum would also draw attention to our response under the consultation on the Planning Circular.

The Forum would also suggest that some additional policy objectives or guidance within the National Marine Plan may be useful to help create consistency between the questions asked and burdens placed on planning applicants in the marine and terrestrial systems. A systematic approach which asks the same questions of applicants in both systems would streamline the application procedure and allow for easier comparison to be made by the two systems

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 vision as set out by the National Marine Plan for clean, healthy, safe, productive and biologically diverse oceans and seas is very much welcomed by the Forum and will set the scene for the Regional Marine Plan for the Clyde. We feel that the NMP gives an opportunity for consistency whilst allowing local detail to give added context at the Regional scale.

The Forum recognises that there is a balance to be struck between providing enough spatial information to be helpful whilst not being overly

prescriptive and therefore constraining the development of Regional Plans. With this in mind we also welcome the ecosystem approach set out on pages 14 and 15, this gives important context to the development of a Regional Plan.

The Forum would welcome further explanation of nationally important projects such as grid infrastructure developments and reserved matters and how they would be recognised and integrated into a Regional Plan.

The Forum was concerned that the responsibilities of the RMP were not well explained with particular reference to the structure and function of devolved and reserved issues. Page 8 states that 'Regional Marine Plans will not affect reserved functions unless a direction is made under the Marine (Scotland) Act 2010 (consequential divisions) order 2010'. The Forum would like further guidance on what this means for strategic issues for the Clyde such as planning for defence activities, for example will there be a mixture of devolved and reserved activities within this sector such as temporal activities e.g. live firing and exercise areas?

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 Forum feels that the addition of the concept of Strategic Sea Areas adds an unnecessary level of complication to planning in the proposed Clyde Marine Region. It is unclear from the text as to exactly what sea area is proposed but the Forum assumes this to be the boundary between N Irish waters and Scottish waters in the mid North Channel.

Although there are important shipping lanes and other concerns such as potential for renewable energy in this area there are also considerable guidance and policy objectives which will ensure that RMP will take policies of adjoining areas into account when undertaking spatial planning. The Forum feels that this is sufficient safeguard to ensure good planning and decision making across this boundary.

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, the Forum broadly welcomes the objectives and policies laid out within the NMP however we would also like to point out that it is not just the island

and remote communities referenced in HMLO9 that are affected by the NMP and its associated objectives, Scotland is an island nation and almost all communities have a connection or relationship with the marine or coastal environment.

Following on from the comment above the Forum would like the NMP to take the opportunity to define what is meant by 'community'. In our opinion there is a risk that community will be defined only by reference to terrestrial/geographical locations e.g. a village community close to a development. In our experience communities can be transient or temporal e.g. recreational boating/fishing communities.

The Forum, in reference to HMLO14 would suggest that in promoting good governance it is not necessary for everyone with a stake in the marine environment to **have** an input but that they have the **opportunity** to input when they feel it necessary

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 Forum feels that this is a useful approach to take. There are many ways to layout strategic objectives and it may be that in future iterations of the NMP it would be possible to shorten the Plan by providing less context for policies. However in this first plan the amount of information provided is useful.

The Forum would like to emphasise the concept of 'Space for Nature', i.e. planning which takes into account the need for species and habitats to adapt to climate change through physical movement or access to new areas or corridors of movement. We would like to see this further incorporated into the NMP including objectives which would allow for space to be allocated in this way.

Climate Change is likely to have an impact on the way most maritime sectors undertake their activities. The Plan offers reasonable scope to adapt to climate change however we would welcome further policies which anticipate these challenges and provide guidance.

The Forum welcomes the emphasis on sustainable development and the recognition that this requires a three pillared approach using economic, social and environmental measures however the way the chapters are structured some do not reference all 3 pillars and this could lead to difficulties at a regional level when trying to define priorities or deal with conflicts. The Forum would therefore like to see each chapter deal with each

of the three pillars where possible.

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

The Forum welcomes the National Marine Plan and feels it has been a very positive, ambitious and stakeholder led process which has delivered a good high level plan incorporating objectives from relevant policy areas such as the MSFD and Marine Policy Statement. This plan, when interpreted at a regional level should provide a platform for sound decision making and security for development, encouraging private investment and avoiding over reliance on public finance.

The Forum has some specific comments on the strategic objectives:

Promoting Good Governance - The Forum would like to see greater emphasis on transparency of decision making including in marine licensing and access to information in the National Marine Plan (please also see our comments under the Planning Circular consultation). A policy which encouraged information sharing between organisations and a 'one stop shop', referred to in the Marine Scotland document, Making the Most of Scotland's Seas, for the public to access information on marine planning applications would be welcome.

In this document the Government talks strongly about the need to work across boundaries, both terrestrial/marine and across sectors. The Forum welcomes a clear and strong steer from the National Marine Plan about this way of working (please also note our comments in this vein in the consultation response to the Planning Circular).

Approach to Policies - The Forum welcomes the sectoral approach taken within the National Marine Plan although this has led to a plan which we feel is perhaps over burdened with policy objectives.

The NMP has avoided being too prescriptive with only the most relevant spatial data being used. However the Forum was concerned to ensure that information used in the NMP was consistent with the Draft National Planning Framework 3, as some of the maps used appeared to give different details (grid connections in particular).

Using sound science responsibly – The Forum welcomes use of terms such as 'carrying capacity' and 'precautionary approach' (HML021) within the NMP but feel that it could be helpful to spell out exactly what these terms mean in the context of the plan. For example the NMP gives a context for the term 'Sustainable Development' and we welcome the UK approach which includes social, economic and environmental considerations, but a definition for carrying capacity is absent and the precautionary principle/approach's only definition (page 27) is not sufficient guidance in The Forum's opinion.

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 are welcomed by the Forum. However we have some specific comments on individual policies:

GEN 2 – The Forum welcomes this policy and would highlight the work done by others to ensure this economic benefit is felt in similar developments in terrestrial and marine systems.

GEN 4 - Further explanation of the term 'scenario mapping' and what this encompasses would be helpful.

GEN 12 – The Forum welcomes this policy and the work done under the Marine Protected Areas network, however we would stress the need for the new Marine Planning Partnerships to be involved in the discussions and management options for these areas. The Forum is concerned that without knowing the final management decisions at this time it is difficult to know what the socio-economic impacts may be. However we welcome options given and decisions made on a strong scientific evidence base and feel that the MPA process has added significant and useful detail to the marine planning processes at this time.

With reference to the evidence base for decision making in the marine environment the Forum would like to stress that we feel decisions taken should continue to be limited by the evidence available

This policy refers to 'species of concern'. The Forum considers that this is too broad a definition and would prefer to see a reference to a more precise conservation outcome, such as Priority Marine Features.

GEN 12 - Supporting paragraphs for Gen 12 list the designations which will comprise the network of protected areas but there is no mention of 'area-based fisheries measures which are considered to contribute to this network'. It will be important that future planning partnerships are made aware of them through the NMP and they are acknowledged in the RMP process.

GEN 14 –The Forum welcomes the commitment to implementing the European Landscape Convention and the references to the importance of national designations e.g. National Parks and National Scenic Areas. However, there should be a stronger acknowledgement that local landscape designations are important at a finer scale of decision making.

GEN 17 – The Forum would seek clarification as to which emissions scenario the NMP refers to. Is this in keeping with the Flood Risk Management Act approach?

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

The Forum welcomes this approach and would like to draw Marine Scotland's attention to the recently completed study on Landscape/Seascape for the entire area of the Firth of Clyde. The report is on our website www.clydeforum.com. In particular, the report details aspects of landscape qualities such as historical sites which the Forum feels are not clearly referenced in the NMP.

The Forum would also welcome guidance regarding consistency across Scotland and the UK when judging the impact of developments on the landscape and the seascape.

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

The Forum would welcome any policies which would increase the value of all landed fish, shellfish and aquaculture products.

Policies to attract additional funding for the encouragement of sustainable management of the marine resource would also be welcomed.

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?

The Forum welcomes policies which would improve the value of catch landed from all types of fishing effort and encourage diversification of the sector and the growth of the home market for high quality produce.

The Forum particularly welcomes FISHERIES 8 and is keen to engage with the Clyde 2020 project.

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

The Forum is keen to ensure that any new fishing policies or marine protection measures are developed and implemented with clear understanding of what they may mean in terms of constraints on the sector or displacement of effort.

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

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

The Forum was concerned to see the Pacific Oyster singled out for inclusion in the chapter. It is our belief that biosecurity is a cross sectoral and cross species issue.

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?

No

Oil & Gas

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

Please see earlier comments regarding reserved versus devolved issues and how they are to be managed in the RMP process.

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?

No

Offshore Renewable Energy

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

Yes, however it is also useful to include text which explains the nature of the spatial information.

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

The Forum would like to again bring attention to the work on landscape/seascape assessment in the Firth of Clyde. The full assessment can be found on our website www.clydeforum.com.

The report includes discussion on the potential for both terrestrial and marine developments to impact on the landscape/seascape and the Forum would like to see the NMP acknowledge this relationship as well as the potential for marine developments to have significant impacts where they make landfall e.g. at ports, harbours and at energy sub stations etc.

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 Forum welcomes the policies within this chapter and would be keen to

ensure that they are well integrated and consistent with the policies within the National Tourism Policy.

The Forum welcomes the recognition of the need to maintain the wild feeling of the West Coast in particular whilst encouraging and supporting the sustainable development of the marine recreation and tourism sector.

The Forum points out that the policies are designed to address both marine tourism and marine recreation, however the discussion within the chapter refers to marine recreation without reference to marine tourism at some points. It is important that these two aspects of marine use are clearly referenced and addressed throughout the NMP.

The Forum believes adequate economic data exists about the economic impact of wildlife tourism and angling and this data should be used within the NMP e.g. SNH Commissioned report 247 and Scottish Government's reports *The Economic Impact of Recreational Sea Angling in Scotland, 2009* and *The Economic Impact of Wildlife Tourism in Scotland, 2010*.

A further data gap has been identified in this sector in relation to skills and the demographic of employees. There is potential that the knowledge and skills to sustainably develop the sector in Scotland may be held by a relatively small number of people who may be due to retire or change careers, as is relatively common in the sector. Information is needed about the demographic of employment to help support the development of the sector in line with the Tourism 2020 strategy in particular.

REC and Tourism 1 – The Forum welcomes the multiple use approach although we would also like to add a note of caution. Although there is room in many cases for multiple use, there will be instances where very specific areas have competing uses which cannot be mitigated for e.g. tidal areas which are used for navigation and recreation and have the potential for energy generation. These areas may provide difficult planning choices and require additional stakeholder engagement to enable solutions to be found.

REC and TOURISM 2 – The Forum agrees with this policy but would like to extend it by adding proposals which support training and act to create centres of excellence. The Forum would also welcome the NMP using this policy to tie in with the existing Scottish Government policies on terrestrial long distance routes and, in addition, the Central Scotland Green Network, and the opportunities presented by this to develop coastal and maritime routes to help grow the marine tourism sector.

REC and TOURISM 7 - The recognition of the impact of non-native species on the sector is welcomed. Work done by the Forum whilst undertaking biosecurity planning for the Firth would suggest that the issue regarding the vast majority of recreational boats is that they are not the only vector for the *introduction* of new species, which, research indicates, have arrived by a variety of means including ballast water and historical transfer as well as

intentional release.

The Forum is aware of the research and data associated with the potential for recreational vessels to act as vectors for the unintentional *spread* of species within European and local waters and feels it would be more appropriate for this to be addressed in the in this chapter, with the need for effective monitoring regimes for the spread of INNS clearly laid out.

Given the extreme difficulties when attempting eradication of marine INNS, once they have become established, the Forum would encourage Marine Scotland to take a proactive approach to marine INNS management and ensure that budget is made available in a shovel-ready format to allow for rapid response when an issue is identified thus helping to protect developing sectors such as aquaculture and recreation.

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 Forum welcomes the guidance in **TRANSPORT 2** with regard to RMP.

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

The Forum would welcome further guidance about managing issues regarding the movement of potentially hazardous cargo in confined and ecologically sensitive waters.

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?

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?

The Forum would like to see the NMP give guidance on how RMP should interact with this sector. In particular the Forum would like to see an emphasis on proactive engagement of this reserved function with the MPP thus building on the long established relationship between this sector and the Firth of Clyde Forum.

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?

The Forum would like to see the NMP reference the impact that moving aggregates by sea has on marine planning including the need for onshore development to support the sector e.g. the use of Peel Ports Clyde for the movement of aggregates from Glensanda Quarry.

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

No

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

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