

CONSULTATION QUESTIONS

1. Do you agree with the proposals set out in the draft Scottish Marine Regions Order 2013?

Yes No

If no, please explain why not and your suggested alternative(s).

The consultation has been considered by the Management Group and Directors of the Forth Estuary Forum. We note that the proposed Region of most direct relevance to the Forum is that of SE Scotland, extending from Berwick-upon-Tweed to Montrose.

The proposed SE Scotland Region offers both challenges and opportunities. These include accommodating both strategic and local marine planning across a diverse range of types of coast and community, involving a large number of statutory and other authorities and bodies currently responsible for two of Scotland's major firths and significant stretches of coast and inshore waters. Partnerships will require to be built where few or none currently exist and a balance between local, regional and national priorities achieved.

We consider that there is unlikely to be a perfect model for delivery of the national marine plan and that even now there remain three key options relevant to this area. In order of preference these are:-

1. A Scotland-wide approach identifying the whole country as the 'Region' with a single strategic Marine Planning Partnership overseeing implementation of the National Marine Plan. Leadership and delivery of local and more detailed components of the Plan would then be devolved to local groups (partnerships) where the particular make-up, uses or potential of a stretch of coast indicates the need for a co-ordinated approach at this level. Thus 'local' partnerships would exist only where necessary to co-ordinate implementation of the national plan in the more complex or challenging areas, while elsewhere the national Partnership could be adequate.

This model would also allow for the establishment of subject-orientated partnerships or working groups to progress aspects of national marine planning, development and use that are less geographically discrete. An example could be renewable energy.

2. Development of SMRs similar to those described in the draft Order. While we consider that, with appropriate effort, a South East Scotland SMR as described could be constructed as a workable operational Region we are concerned that its incorporation of two of Scotland's major firths, three distinct stretches of open coast and large number of statutory and other bodies could make it too big. There is a risk that the associated marine planning partnership, being neither truly local nor national, could fall between two stools and end up being a 'middle tier' body caught between national and local responsibilities, unable itself to achieve effective delivery of either the national or local primary aims of Scottish marine policy and legislation.

We therefore propose that there should be two Scottish Marine Regions in SE Scotland – one from Berwick on Tweed to Fife Ness (possibly named the 'Forth and Borders SMR'?); and one from Fife Ness to Montrose, replicating the area currently covered by the Tay Local Coastal Partnership. This solution would maintain the

individuality of the Forth and Tay Estuaries, ensure the local involvement and 'voice' of their many Local Authorities (10) and make both spatial planning and local involvement feasible and realistic.

3. The SE Scotland SMR, as described in the Draft Order is the third option. As noted above we have concerns about the potential management and effectiveness of a Region of this size and complexity. Were it, however, to prove the eventual outcome of the current consultation we would be ready to put all the effort required into contributing to its construction as a workable operational Region.

2. Do you have any further comments? In particular we are seeking views on

- the drafting of the Order;
- the co-ordinates establishing the marine region boundaries;
- the boundaries outlined at paragraph 8 above;
- the names of the regions suggested; and
- the illustrative map.

Comments

1. We are most anxious that the national and international importance of our coasts and inshore waters are managed for local as well as national benefit, reflecting both their individuality and their place in the national resource.
2. We comment above on the boundaries and names of possible SMRs as they relate to that described as SE Scotland in the draft Order.
3. We would wish that the efforts and benefits of the Government-sponsored Forth Estuary Forum contribute to and are built upon in whichever of the above options is ultimately progressed. While the governance and operations of any SMRs and Marine Planning Partnerships are still to be consulted upon and progressed we believe there will continue to be a key role for the current Local Coastal Partnership in either a similar or modified form to the present time and that we could offer proven independent and unbiased leadership to the future partnership.
4. We would wish to ensure that our small number of skilled staff also have every chance of continued employment and contribution to future arrangements.

3. Do you believe that the creation of Scottish Marine Regions discriminates disproportionately between persons defined by age, disability, sexual orientation, gender, race and religion and belief?

Yes No

4. If you answered yes to question 3 in what way do you believe that the creation of Scottish Marine Regions is discriminatory?

Comments