

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).

Although we are generally in accord with the draft Order, we have some concerns regarding the naming of the new regions and boundary points as outlined below.

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.

Drafting of the Order

We have no particular concerns other than the note below re the map references used for defining boundary co-ordinates.

Co-ordinates establishing the marine region boundaries

Although we agree that it is appropriate to use latitude and longitude / World Geodetic System 1984 (WGS84) to define boundary points, this caused difficulties for some stakeholders during the consultation. For example, SEPA staff contacted were unable to identify from their mapping system where the proposed SMR boundary points fell in relation to water treatment plants etc., without these being converted to British National Grid (BNG) references, or to Northings and Eastings. Others suggested Northings and Eastings were the preferred system for charting features on the seabed etc.

We appreciate that it would not be appropriate for BNG or other co-ordinate references to be detailed within the Order itself in addition to latitude and longitude. Instead, we wonder whether an advisory note could be attached to the Order showing the co-ordinates in other formats for clarification and ease of reference, particularly where the boundary points on land do not coincide with an identifiable geographic feature.

Boundaries outlined at paragraph 8 above

The MFP has only commented on the boundary points relative to the Moray Firth area. The boundary with the proposed North Coast area seems most appropriate. The proposed boundary west of Fraserburgh is acceptable. However, it would have been preferable for the boundary to be located at a named geographical feature on the map, rather than at a visually indeterminate point "between Fraserburgh and Sandhaven". E.g. Kinnaird Head, already accepted as representing the Moray Firth's boundary, would still have fallen outside the western

boundary for the Fraserburgh harbour port limits, leaving Fraserburgh harbour in the north east coast area as it wished to be for operational purposes.

Names of the regions suggested:

The MFP has concerns that some of the names proposed may lead to unnecessary confusion between the English marine plan areas and Scottish marine regions (looking at wider UK issues as a whole). Also some appear confusing and do not reflect common perceptions of areas, which may impact on achieving local “buy in” to processes. For example, “Moray” is not an acceptable term for the whole Moray Firth area including Highland, Moray and Aberdeenshire regions. Also, North East, South East and South West are the same names as used by already established English marine plan areas. North east for the Grampian / Angus coast will be confused with the north east England.

We suggest the following changes:

Moray Firth instead of Moray;

North East Scotland instead of North East

South East Scotland instead of South East

Solway (or Solway and South West) instead of South West

The illustrative map.

This appears clear and we have no specific comments.

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