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Your ref:
Our ref: SCF SMR 280213

Date: 28 February 2013

Dear Wendy,

Scottish Marine Regions Consultation

The Scottish Coastal Forum is pleased to respond to the consultation on the proposed boundaries for Scottish Marine Regions. We welcome the publication of this document and trust that it will offer a useful contribution to the continuing development of marine planning within Scotland.

Those of our members with an interest in this subject will have responded independently but the SCF would wish to make three particular points:

1) That the agreed Scottish Marine Region for Moray be renamed as "the Scottish Marine Region for the Moray Firth" as the proposed geographic coverage matches the extent of that feature. To name a SMR after a single local authority area (Moray) when it extends to include areas covered by Highland Council and Aberdeenshire Council as well as Moray Council seems erroneous when it is likely that it will be referred to as the "Moray Firth SMR" in any case.

We understand that other proposed names for prospective regions have caused some comment around the country. In particular, there is concern that generic titles such as "north east" and "south west" are insufficiently reflective of their Scottish focus and could be confused with the marine planning areas in England.

2) We are aware of some concern regarding the boundary between the proposed Clyde and south west areas. It is not our intention to repeat the submissions made by the Firth of Clyde Forum or the Solway Firth Partnership but we consider that the reasons outlined in those responses are worthy of consideration and ask that they be given due weight in the final decision making process.

3) The proposed SMR for the south east encompasses two distinct estuary areas in the Firth of Tay and the Firth of Forth. These areas have, historically, been the focus of separate Local Coastal Partnerships, set up to deliver Integrated Coastal Zone Management for those areas. We have some concerns about how the very distinct characters of these two Firths are to be accommodated within regional planning arrangements for a geographic area of much greater scale. We look forward to hearing more about the proposals for setting up marine planning arrangements relating to this extended area, in particular, in due course.



Further to point 2, you will already be aware of the interest in future management arrangements shown by the existing Local Coastal Partnerships. During 2013/14, the Scottish Coastal Forum looks forward to working with Marine Scotland in the development of Marine Planning Partnerships and considering what roles, if any, existing ICZM partnerships may play in the new marine planning regime.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Rhona Fairgrieve", written over a faint, illegible background.

Rhona Fairgrieve
Scottish Coastal Forum Manager

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).

Comments

Broadly, we consider that the proposed boundaries should offer a reasonable opportunity for regional marine planning around Scotland.

However, we are aware of some concern regarding the boundary between the proposed Clyde and south west areas. It is not our intention to repeat the submissions made by the Firth of Clyde Forum or the Solway Firth Partnership but we consider that the reasons outlined in those responses are worthy of consideration and ask that they be given due weight in the final decision making process.

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.

The SCF suggests that the agreed Scottish Marine Region for Moray be renamed as “the Scottish Marine Region for the Moray Firth” as the proposed geographic coverage matches the extent of that feature. To name a SMR after a single local authority area (Moray) when it extends to include areas covered by Highland Council and Aberdeenshire Council as well as Moray Council seems erroneous when it is likely that it will be referred to as the “Moray Firth SMR” in any case.

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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