

PLANNING SCOTLAND'S SEAS

PRIORITY MARINE FEATURES

CONSULTATION RESPONSE FROM COMHAIRLE NAN EILEAN SIAR

Q1. Do you agree with the recommended list of Priority Marine Features as the basis for targeting future marine conservation action in Scotland's seas?

If your response includes a suggestion to amend the list, please indicate the specific species and habitats that your comments apply to and, where possible, provide or reference any evidence or data sources which have influenced your comments.

Yes No

It is difficult to respond to this question without further information on defining to what level and extent better habitat and species protection will be developed. Further information is also required as to the context of future conservation action especially in relation to mobile species.

In addition it is unclear what impact there may be on local areas as there is little spatial data on habitat and species. There is no reference to proposed management measures without which it is difficult to assess whether the PMF list is comprehensive or not.

It is clear that the PMF list has been developed at a national level reflecting habitats and species of marine conservation importance across Scotland. However at a local level, from an Outer Hebrides perspective, many of the identified species, especially the mobile species which are also commercial fish stocks, represent stocks considered healthy and abundant relative to fishing activity e.g. spiny lobster, mackerel. In light of this the PMF list should reflect species for which scientific advice has advised reduced fishing mortality i.e. restricted to those species under threat or decline. With this approach spiny lobster, monkfish, Atlantic halibut herring, mackerel, ling and saithe should be removed from the list.

For specific features, priority should be given to consultation with the most appropriate local stakeholders e.g. for the habitats and species connected with commercial fisheries local Inshore Fisheries Groups are ideally placed to provide this knowledge.

Under the Our Islands Our Future initiative the Outer Hebrides, Orkney and Shetland recognise that Islands by their very nature are special places with special requirements and call for a commitment that the needs and status of the island areas are clearly recognised.

The three islands group believe that the principle of subsidiarity should be at the heart of policy development across the islands. Applying the principle of

subsidiarity will give the three islands group the opportunity and responsibility to provide the services and carry out the functions appropriate to their communities. It will also give the power to develop initiatives and introduce strategies to meet the special needs of their areas and ensure sustainable economic growth.

The current consultation on the National Marine Plan has been preceded by proposals for Scottish Marine Regions which would see each of the three island groups have a distinct Scottish Marine Region for their surrounding inshore waters (0-12 nautical miles).

At the same time the three islands group wish an active part in the planning and managing of development and exploitation of resources in and around their respective shores in order to ensure they benefit their communities without compromising the local environment.

To achieve sustainable development of the islands resources Comhairle nan Eilean Siar feels that the identification of Priority Marine Features can only be made whilst assessing economic and social features at the same time and the impact of any proposed management measures. This assessment needs to be done on a local basis either independently of development of Scottish Marine Regions or as part of it.

General

Q2. Are there other issues that have not been highlighted in this consultation that you would like to mention?

Yes No

Although the features in habitat form are identified in the National Marine Plan Interactive tool definitive information on the location of these habitats is not readily available to organisations or individuals preparing an application for licence or planning consent. It is unclear what spatial information is available regarding features in species form especially in relation to mobile species.

It is also unclear what the relationship is between features that are a proposed Marine Protected Area designation and also a Priority Marine Feature. Will management measures proposed for MPAs be adopted across all areas where a Priority Marine Feature exists including outwith MPAs?

Clarity is also required as to the regulatory status of the recommended Priority Marine Features. It is stated that the list should be taken account of in Environmental Statements and through relevant licensing/consenting decisions – does this require that these must be taken account of on the same basis that possible Special Areas of Conservation (pSAC) and possible Special Protection Areas (pSPA) are treated until formally designated?

In addition there needs to be clarity as to the process of features being added or removed from the list, the timescales involved and proposed stakeholders consulted. This process is identified in paragraph 1.5 in the response above. As this list represents a point in time and with changing water temperatures and new or growing species abundance in those warmer waters it is important that communities should be able to benefit from those changes and not be prevented from undertaking new development opportunities as a result of a list developed years before.