CONSULTATION QUESTIONS

Please identify the main area of interest you identify with :

Nature Conservation		
Fisheries		
Industry/Transport		
Energy		
Aquaculture		
Recreation/tourism		
Academic/scientific	\boxtimes	
Local authority		
Community group		
Public sector/Regulatory body		
Local Coastal Partnership		
Other (Please state)		

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

I think broadly it does a good job, although please note that all of my comments are in relation to climate change aspects of the NMP

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

N / A

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?

N / A

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?

N/A

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?

N / A

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?

In the climate change section, do you want to give the impression that mitigation is more important than adaptation – as the first line would seem to imply?

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

In Box A, I wonder if more could be brought out about impacts from climate change pressures given the importance CC is afforded upfront (along with fishing as the 2 biggest pressures)

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?

Climate change comments:

Is there a point to make about effective 'co-location' of activities to help with these [climate change mitigation and adaptation] aims?

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

N / A

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

Chapter 4?

N / A

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?

No

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

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?

Climate change section comments:

Perhaps say storms / winds / waves could become more severe in the following part, as it is by no means certain that this will be the case given the disagreements amongst climate models. Suggest change text to:

Storminess and adverse wind and wave conditions could become more severe in the future as our climate changes. If conditions do get harsher, this would increase the risk of escapes from finfish farms (from added pressures on fish farm equipment) as well as impacting on shellfish production from overflows from human waste water treatment

plants.

Other points that might be worth highlighting here include:

- What opportunities (or risks) could climate change present to aquaculture as a result of CC impacts on yields from capture fisheries? What are the interactions?

- What impacts will CC have on the (global?) production of fishmeal?

- Any impacts from sea level rise at coasts / estuaries?

- Maybe highlight potential impacts on life cycle of sea lice (will warmer winter temps mean this gets worse?)

- If industry growth moves offshore will different pressures be presented? (less sheltered?)

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

No

Q16. Are there alternative planning policies that you think should be included in this Chapter?

N / A

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?

N / A

Oil & Gas

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

Climate change section comments:

Again, might want to say that climate change <u>could</u> increase severity of weather. I guess this could impact on the physical structures, operating windows, safety of staff (both whilst on the structures being transported to the sites).

Q20. Are there alternative planning policies that you think should be included in this Chapter?

N/A

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?

N / A

Offshore Renewable Energy

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

N / A

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

Climate change comments:

Should the climate change part include potential impacts on the energy resource itself (e.g. wind and wave strength and direction and operating limits)? Also should impacts on structures and cables be included (e.g. scour patterns around wind turbines or impacts of currents / changes in sedimentation on exposure of cables?). For any tidal barrage schemes, would things like climate change impacts on habitats and species have to be taken into account as part of impact assessments.

Are there challenges with filling so much marine space with offshore renewables that should be noted (i.e. how does this sit alongside other marine activities)

Q25. Are there alternative planning policies that you think should be included in this Chapter?

N / A

Recreation and Tourism

Q26. Do you have any comments on Recreation and Tourism, Chapter 12?

Climate change comments:

In the climate change section could add this to the following line:

Coastal paths and coastal infrastructure may become increasingly vulnerable to flooding and coastal erosion.

Could draw out a few more examples relevant to the 'popular' pursuits highlighted upfront in this chapter, e.g.:

- Impacts of climate change on target species for sea angling

- Impacts on wildlife watching (e.g. marine mammals or seabirds)

Q27. Are there alternative planning policies that you think should be included in this Chapter?

N / A

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?

N / A

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

Climate change comments:

For the climate change section, which completely focuses on mitigation, should there be more focus on climate change on transport (e.g. changes in storminess causing disruption or cancellation of ferry services in the western Isles if conditions did get harsher; possible increase in pollution events from stricken vessels / safety of ship to ship transfers). Also what about changes in dredging / sedimentation?

Should any links between ballast, climate change and non-natives be made?

Maybe there should be something on opening of arctic shipping routes as a means of minimising fuel consumption...but will there be much focus on mitigation for shipping anyway? (i.e. if shipping emissions continue to lie outside international agreements on cutting GHG emissions)

The following text at the end of the chapter sounded a bit optimistic! – "A warming climate may benefit tourism and recreation and new harbours may be required to provide access and the necessary facilities".

Q30. Are there alternative planning policies that you think should be included in this Chapter?

N / A

Telecommunication Cables

Q31. Do you have any comments on telecommunications, Chapter 14?

Climate change comments:

Perhaps this should include any impacts on changes in sedimentation on exposure of cables (potentially leading to more breakages, especially if current increases?) – I think [telecommunication] cables are too small to have any scour effects.

Q32. Are there alternative planning policies that you think should be included in this Chapter?

N/A

Defence

Q33. Do you have any comments on Defence, Chapter 15?

Climate change section:

The climate change section seems a little 'defensive' and doesnt reveal much (i.e. just that it will be sorted out). Maybe some text (like that which appeared in Charting Progress 2 (CP2) military defence chapter) would at least acknowledge the potentially wide ranging and challenging issues faced. Also CP2 references a 5 year study which should have been completed by now, should this be referenced in any way?

Text from CP2 defence part:

The impacts of climate change on military defence activity are likely to be complex and far reaching due to the large scope of activities. A five-year programme of work was begun in September 2007 by the Hadley Centre to determine these impacts on the MOD.

Q34. Are there alternative planning policies that you think should be include in this Chapter?

N / A

Aggregates

Q35. Do you have any comments on Aggregates, Chapter 16?

Climate change comments:

The climate change text doesnt actually make sense so needs 'affect' or 'interfere' removing.

Aggregate extraction could potentially <u>affect interfere</u> with coastal processes and thus alter local rates of coastal change, which could exacerbate the predicted effects of a changing climate.

Should potentially impacts of storms and waves be mentioned with regards to operating windows for aggregate extraction? Also should the increased need for aggregates for soft engineered coastal defences (to protect against CC impacts) be noted? Might also want to say something on emissions from the industry?

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

N / A

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.

Climate change will impact across both aspects to a greater or lesser degree, see earlier comments for each section.

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?

Comments