

CONSULTATION QUESTIONS

Please identify the main area of interest you identify with :

- | | |
|-------------------------------|-------------------------------------|
| Nature Conservation | <input type="checkbox"/> |
| Fisheries | <input type="checkbox"/> |
| Industry/Transport | <input type="checkbox"/> |
| Energy | <input type="checkbox"/> |
| Aquaculture | <input checked="" type="checkbox"/> |
| Recreation/tourism | <input type="checkbox"/> |
| Academic/scientific | <input type="checkbox"/> |
| Local authority | <input type="checkbox"/> |
| Community group | <input type="checkbox"/> |
| Public sector/Regulatory body | <input type="checkbox"/> |
| Local Coastal Partnership | <input type="checkbox"/> |

Other (Please state)

Comments

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

1. It would be helpful if the document referred to the time period over which the Plan is intended to operate, what the arrangements are for monitoring and when the Plan has to be reviewed.
2. The term "adaptive management" of plans (pp 19) should be defined, perhaps in relation to the suggested additional information required on monitoring and review mechanisms referred to above.
3. It is suggested that exercises are conducted to determine how, when, where and why the policies might be used by plan makers (Regional Marine Plans and Local Development Plans), and decision makers (officers and Councillors) in particular circumstances. 'Scenario testing' of policies is commonplace when Councils prepare strategic or local development plans. This would help understand how the policies might be interpreted 'in real life' and thereby allow an opportunity to refine the wording to make them

more likely to be understood, applied and used in the way intended.

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

No. As referred to in SSPO's comments on the Highland, Orkney, Outer Hebrides and Argyll and Bute Local Development Plans, there is scope for potential conflict between policies for aquaculture set out in those plans and with marine plans especially where, as at present, the latter lags behind the former in terms of statutory standing. This is especially the case at present and when the National Marine Plan is finalised and adopted next year. At that time planning authorities dealing with planning applications for fish farms will have to determine them

"according to the appropriate marine plans unless relevant considerations indicate otherwise" as well as "according to the development plan unless material considerations indicate otherwise".

The existence of two (three when we have RMPs) plans for fish farm development raises three principal concerns:

- (i) There is a potential for conflicting policy between the LDP and the appropriate marine plans;
- (ii) There is the risk of an uneven playing field between fish farming and other marine development if the different standards are applied in the marine plan and in the LDP; and
- (iii) Resolving how are decision makers going to judge the weight to be given to policies in either plan especially if they are not consistent.

Aquaculture is unique in being covered by the two different planning regimes. Unfortunately the wording of the primary legislation has not taken this into account as, while it requires decisions on authorisations and enforcement to be taken 'in accordance with' the marine plan, it only requires terrestrial planning authorities to 'give consideration' to marine plans when formulating development plan policy. Given that decisions must be made in accordance with policy, this creates a significant problem that may persist for at least the next 5 years unless LDPs are reviewed, as far as aquaculture policy is concerned, earlier than this. As long as terrestrial planning authorities have responsibility for preparing planning policy covering aquaculture in the marine area, and they are only required to 'give consideration' to marine plans in doing so, 'integration' of policy and decision making as far as aquaculture is concerned may be problematic. The fact that there are at least five different terrestrial planning authorities dealing with aquaculture in the marine area adds to the potential for inconsistency in policy and interpretation of it for decision making purposes. This will be exacerbated when the Regional Marine Planning Partnerships are formed and they produce their own plans.

As decisions on planning applications for fish farms must be made in accordance with both the National Marine Plan and the Local Development Plan, Planning Authorities (Councils) need guidance on what to do if

policies for aquaculture are inconsistent or in conflict with each other. SSPO believes that, if policies for aquaculture in LDPs and Marine Plans conflict, or are inconsistent, the policies in the latter should take precedence. This would be entirely justified given that it is the Scottish Government's intention that marine plans will;
"provide the principal spatial framework for the decisions about the location of new aquaculture development." (Para. 77 - Draft Circular on Marine Planning)

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?

Further guidance will be required to deal with the issues highlighted above in the response to Q2.

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?

No comment.

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?

SSPO fully supports the Strategic Objectives set out in the Draft Plan. SSPO also supports many of the policies as they relate to fish farming. However there are some policies on aquaculture that either do not reflect the Strategic Objectives or are considered contrary to them. See detailed comments below.

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?

No comment.

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

See Q1 above.

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?

SSPO agrees with policies GEN1- 3.
GEN 4 - The term 'Scenario Mapping' should be defined.
GEN 5 - Agreed.
GEN 6- See comments at Q2 above.
GEN 7 - The terms 'integration' and 'compliance' are used in relation to 'other statutory plans' e.g. River Basin Management Plans. Councils' LDPs are statutory plans but the term 'compliance' is not used in GEN6. It is not explained who the 'planners' are as referred to in this policy. Who will use this policy?
GEN 7 – This raises the profile of non-statutory plans, such as Shore Line Management Plans or ICZMs. SSPO does not necessarily agree with this. There is an issue here of a multiplicity of plans that developers have to refer to. It is up to high level documents like the NMP to draw a line in the sand and state clearly that decision makers should only have regard to plans that have gone through proper statutory processes. All this will mean is that any Council, or other body, wishing to rely on a plan's policy to make a decision must first make sure it is covered by some statutory process, including proper consultation. Councils, as planning authorities, now have no reason to rely on, or refer to, non-statutory plans as the compulsory five year review of Local Development Plans gives them every opportunity to incorporate policies in the statutory plan.
GEN 8 - Is this not a given?
GEN 9 - The salmon farming industry is a model of early engagement as the Draft Circular on Marine and Terrestrial Planning acknowledges. It should be made clearer who the policy is aimed at, developers and/or plan makers/decision takers.
GEN 10 - SSPO welcomes this policy and the supporting text explaining more clearly what 'precaution' and 'risk based approach' should mean in plan making and decision taking processes.
GEN - 11-19 No comment.

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

Yes.

Q10. Are there alternative general policies that you think should be included in Chapter 4?

No.

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 comment.

Sea Fisheries

Q12. Do you have any comments on Sea Fisheries, Chapter 6?

Policy FISHERIES 5 - SSPO would be concerned at the impact of this policy on prospective fish farm developers. It is not clear how a 'fisheries management plan' might be formulated; what might happen if efforts to 'agree the plan' were not successful; and the weight that might be given to such a plan, or its absence, by decision making authorities, e.g. planning authorities, when determining a planning application. Given that a planning authority would have to make a decision 'in accordance with the marine plan' SSPO would be very concerned if they started determining applications, and possibly imposing conditions, relating to this requirement. Such conditions may not comply with Scottish Government guidance on the use of planning conditions. (Circular 4/1998 The Use of Conditions in Planning Permissions)

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

No comment.

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?

(i) The proposed policies for aquaculture should; (a) comply with the Strategic Objectives for the Marine Plan; (b) comply with the General

Policies set out in Chapter 4; (c) be designed to achieve the stated sectoral objectives; (d) be consistent with Scottish Planning Policy, and vice versa; and (e) be reasonable in all other respects, as far as the industry is concerned.

(ii) NPF3 and SPP are expressions of the Scottish Government's policies for the use and development of land and the NMP is an expression of its policies for the use and development of the sea. Therefore, given that aquaculture is unique in being covered by both planning systems, it would be reasonable to expect the wording of these documents to be almost identical when dealing with aquaculture.

(iii) SSPO made its views known on the Draft SPP and NPF3 Main Issues Report in July 2013. Generally the Draft NMP appears to adopt language that is much more positive in relation to aquaculture development including fish farming. It picks up on the importance of the industry to export earnings, economic growth, employment, supporting rural communities, food security and health. (pp 058-060). SSPO therefore fully supports this approach subject to the further detailed comments below.

(iv) Page 58 Objective 2, first bullet point.

Salmon production in Scotland is planned to increase by an average of 4% per year, a development rate that was determined by an assessment of the time required for development planning of new farms. However, Scottish production as a proportion of market supply (which reflects the growth in consumer demand) is falling. As a proportion of world production it has fallen from 10% in 2001 to 7% in 2012. Therefore the planning assumption of 210,000 tonnes by 2020 should be considered as a minimum target. This should be reflected in the summary by saying '**marine finfish to at least 210,000 tonnes**'.

(v) Page 58 Objective 3

Salmon production does not only secure employment in remote and rural areas, it contributes to employment widely across Scottish constituencies, including in North East and Central Scotland. Because of its continuity of supply it is now essential to maintain fish processing jobs in many traditional fishing areas, where supplies of sea caught fish have declined and are variable. Change to read: '**Secure quality employment and sustainable economic activity in remote and rural areas, as well as more widely in Scotland.**'

(vi) Page 58, Text, paragraph 1.

The growth of the aquaculture sector may be an aspiration on the part of the Scottish Government. However, it is a plan on the part of the Scottish industry, which is putting in the effort and investment to make it happen. Revise first sentence to read: '**Aquaculture in Scotland is a growing and increasingly important industry; evidenced both by the sustainable growth plans -----**'

(vii) Page 58, Text, paragraph 2

The figures for employment given in this paragraph relate only to jobs on farms. These are only a very small proportion of the jobs that depend on salmon farming. Up to date figures on the total jobs impact should be obtainable from the ongoing Scottish Government's 'Imani' project. These should be the figures included in the plan.

(viii) Page 59, paragraph 4, line 1. Replace the word aspirations with the word plans.

(ix) Page 60, Living within Environmental Limits, second bullet point. The industry already adopts a strategic approach to disease management. Delete the words: 'seeking to develop'.

(x) Page 60, paragraph 1, line 4 and paragraph 3. The national plan is lacking in logic and coherence in its approach to the presumption against finfish farming on the North and East coasts and also its aspiration to increase diversity of farming into other species. Firstly, the introduction of the presumption against planning on the North and East coasts was specifically introduced as a temporary measure because there was no aquaculture planning system at the time. There is now a planning system in place, so this issue has been fully addressed. It is explained in the text that the 'presumption against' was introduced 'to help safeguard migratory fish species'. This safeguard was put in place specifically against the possibility that there was a risk to migratory salmonids from the farming of salmon. In what way can the farming of non-salmonids create a risk to migratory salmonids? If a presumption against development is to be maintained it can only be on the original basis of there being a perception of a possible risk from farmed salmonids. Thus, at a very minimum, the presumption against should be restricted solely to the farming of salmonid species.

Salmon farming is likely to remain the most profitable form of fish farming in Scotland for the foreseeable future. Salmon farming is 'presumed against' for the North and East coasts, and the South West coast is unsuitable for salmon farms. Thus there should be a presumption in favour of salmon farming on the North West Coast and in the islands, and other kinds of development should be zoned away from these areas.

(xi) Page 60, penultimate paragraph, last sentence

The last sentence says that all methods of deterrence will need to have been tried before a licence to shoot is granted. This statement is incorrect. For example, there are some areas where SNH will not allow the deployment of acoustic deterrent devices because of the presence of cetaceans.

Reword as: 'Seal licences will only be granted where other management options are precluded or have proven unsuccessful in deterrence.'

(xii) The sentence at the foot of page 60 is incomplete.

"There may be some environmental impacts from both shellfish and finfish aquaculture developments."

It should go on to say that nearly all fish farm developments require to comply with the EIA Regulations and that those environmental impacts are thoroughly assessed to establish whether or not they are significant.

(xiii) Page 61, paragraph 3.

The word 'contingent' means 'depending for its existence on'. This statement is therefore incorrect. It is technically possible to produce salmon on a diet that contains virtually no fish meal or fish oil; selection of sustainable sources of fishmeal and fish oil has been a decision made by the industry. Revise the sentence to read: '**Growth of the industry must take account of the sustainability of other species including -----**'

(xiv) Page 61, last paragraph.

The first sentence needs to be clarified.

Revise as: When compared to other animal production systems, aquaculture has a low carbon footprint.

(xv) There needs to be an explanation somewhere (Background and Context) that aquaculture is covered both by the marine and land use planning systems and that Councils currently are taking the lead role in 'planning for future fish farm development' through the Local Development Plans and making decisions on planning applications. The Draft Circular on the relationship between marine and terrestrial planning is important here. There are references in the text to SEPA's role and Marine Scotland's role in regulating fish farming but not to Councils as planning authorities.

(xvi) SSPO would draw attention to the comments made on the NPF3 MIR, the Draft SPP, the Pentland Firth and Orkney Waters Marine Spatial Plan Pilot, the Highland LDP, the Outer Hebrides LDP, the Orkney LDP and the Argyll and Bute LDP in relation to :

(a) having a presumption in favour of fish farming development where conditions are suitable, other than those areas otherwise constrained, and;
(b) designating those parts of the marine area considered suitable for the production of farmed fish or shellfish as 'Prime Aquacultural Water' and affording those areas the same protection from other forms of development as is afforded to Prime Agricultural Land.

Such policies would appear reasonable especially if the Scottish Government persists in a presumption against finfish farming on the north and east coasts. It would also seem reasonable given that other sectors have been favoured in this way.

SSPO believes that, in order to achieve the stated strategic objectives for aquaculture, such policies, supported by spatial information, will be necessary. The MSS research referred to on page 64 could well assist in this respect.

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

AQUACULTURE 1 - SSPO supports this policy.

AQUACULTURE 2- SSPO supports this policy. However the current round of Local Development Plans does not do this fully and the current wording of the new Draft SPP is wholly unacceptable to the industry. As currently drafted, the new Draft SPP does not set the appropriate context for the objectives and policies set out in the Draft National Marine Plan. As referred to at Q14 above, the wording of all the policy and guidance documents relating to planning for aquaculture ought to say the same things. As a starting point the Draft National Marine Plan should be the model for all other documents. SSPO would suggest that the section on aquaculture for the new SPP should be rewritten by those who wrote the Draft NMP. (Please refer to the SSPO comments on the NPF3 MIR, the Draft SPP and on the Pentland Firth and Orkney Waters Marine Spatial Plan Pilot (PFOWMSPP))

AQUACULTURE 3 - Please refer to SSPO's comments on the NPF3 MIR, the Draft SPP, and the PFOWMSPP. See also response "(x)" under Q14 above.

It is noted that the policy in the Draft NMP has had the following wording added:-

"(over 80% of wild salmon are located on the east and north coasts of Scotland)"

This would appear to indicate that the policy is actually only about farmed salmonid species. It should also be noted somewhere in the plan that the South West coast is not suitable for salmon farming or for most kinds of finfish farming. Development possibilities here are therefore strictly constrained. This also means that 90% of wild salmon populations are located outwith the zone in which salmon farming is possible or allowed.

In addition this policy does not fit with the Strategic Objective about Using Sound Science Responsibly (pp 16) nor Policy GEN 10 (pp 27) about using sound evidence on which to base policies. Nor does it fit with policy AQUACULTURE 13 "Proposals that contribute to the diversification of farmed species will be supported, subject to other criteria being satisfied"

AQUACULTURE 4 - No comment.

AQUACULTURE 5 -No Comment.

AQUACULTURE 6 - No comment.

AQUACULTURE 7 - SSPO supports this policy.

AQUACULTURE 8 - SSPO supports this policy.

AQUACULTURE 9 - If this policy is to ensure appropriate measures are in place to dispose of waste following a mass mortality event, then it should

not be restricted to only the types of events described.

AQUACULTURE 10 - It is not clear what type of 'application' is referred to in this policy; planning, CAR licence, marine licence, other, or all of the above. Other than for 'major' applications, (as defined in the Town and Country Planning) Hierarchy of Developments)(Scotland) Regulations 2009, there is no statutory requirement to carry out pre-application discussion, consultation and engagement as described in this proposed policy. However the salmon farming industry, through SSPO, has produced and adopted a Protocol for Preparing Planning Applications for Aquaculture Development which commits member companies to consult and engage with communities, statutory bodies and other stakeholders before preparing their applications for fish farm development. This is a model of good practice and is recognised as such in the Draft Circular on Marine and Terrestrial Planning. While SSPO would support the policy in principle, as it would require non member companies also to follow such good practice, it is difficult to see how it could be implemented or enforced. The Protocol was adopted entirely voluntarily by SSPO member companies although it did derive from the Delivering Planning Reform for Aquaculture Agreement of 2010.

AQUACULTURE 11 - As referred to in the SSPO response to the Draft SPP in July 2013.

"The adherence to 'relevant technical standards' (Para. 186) is not material to the determination of planning applications and planning authorities should not seek from applicants information that is not relevant to the consideration of the planning issues. Whether or not equipment might comply with a certain 'technical standard' or be 'fit for purpose' is not a material planning consideration in the same way that compliance with the Building Standards is not material to the determination of a planning application for building a house."

It is accepted that the policy proposed does not refer to planning applications. However, as decisions on planning applications must be made in accordance with the NMP, when adopted, this would require planning authorities to take technical standards into account. As SSPO pointed out in relation to the Draft SPP, compliance with 'technical standards' and being 'fit for purpose' are not material planning considerations. There are other regulatory regimes in place that deal with these issues. The NMP policy, or supporting text, should therefore make it clear that this matter would not be for consideration by the planning authority when assessing a planning application.

AQUACULTURE 12 - SSPO supports this policy.

AQUACULTURE 13 - See comments on Policy 3 above.

Page 64, The Future,
Bullet point 1, line 4 Replace MGA with MGSA

Bullet point 3. It is very strongly recommended that this project be considered with the aquaculture industry at the earliest opportunity to avoid misdirected effort and maximise the benefit of expenditure of public funding.

Bullet point 3, line 1. Presumably the reference to 'salmon farms' should read 'fish farms', including shellfish farms?

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

The NMP policies on aquaculture could be augmented by policies that gave guidance to decision makers on what issues they need not consider when coming to a determination. To assist in this, the NMP could use the work of ISLAD and provide guidance on who does what in relation to the regulation of aquaculture development. Given that SPP is being truncated so much, this sort of guidance is needed somewhere.

Wild Salmon and Migratory Fish

Q17. Do you have any comments on Wild Salmon and Migratory Fish, Chapter 8?

Page 67, Objectives, point 1 and Point 2.

There are significant shortcomings in the plan in regard to these two objectives (see below). Indeed this section of the plan contains very little on wild fisheries, choosing instead to concentrate on aquaculture and renewable energy development and their presumed risk to fisheries (which has already been covered in other sections). Overall, this section of the plan lacks any discernible strategy for wild fisheries management or wild fisheries development.

If Scottish wild salmon and migratory fish stocks are considered an economically important resource – and we believe they are important – then the plan should be designed to address the sustainable development of the fisheries or, at a minimum, the sustainable management of the fisheries. It appears that at present the fisheries are unsustainable under the current pressure of exploitation, without the necessity of wholesale catch and release fishing (which is already banned on fish welfare grounds in several European countries). There is therefore a planning need to consider how the fisheries may be established on a more sustainable basis.

The plan should start from a clear understanding that salmon and other migratory fish are widely distributed in Scottish rivers and are not generally 'at risk' in terms of wildlife conservation. The planning challenge is therefore one of maintaining or developing stock surpluses which can be exploited

both by netting and by rod fisheries.

Page 69, paragraph 2, lines 4/5.

The statement 'salmon and trout angling has been estimated to contribute £87m to the Scottish Economy' is misleading. So far as we are aware, there are no published estimates of the direct contribution of salmon and trout angling to the Scottish economy. Rather, the estimate that has been made is of the total expenditure made by interviewed anglers, including all forms of tourism expenditure on accommodation, meals etc.

Suggest rewording as 'visiting salmon and trout anglers have been estimated to contribute £87m to the Scottish economy, mainly indirectly through tourism and related expenditure'.

Page 69, paragraph 4, line 5.

On what basis of evidence can it be said that 'Delayed migration or displacement of migratory routes may have significant effects on salmon and other migratory species – '

Suggest the word significant is deleted.

Page 69, Aquaculture,

There is no evidence of spatial impact of aquaculture on wild salmonid catches. Thus, the very first stage in any assessment of 'risk from aquaculture' is to establish robust monitoring of the wild salmonids both for Atlantic salmon (*Salmo salar*) and brown trout (*Salmo trutta*). The only realistic way that this can be done is to make use of the fishing catch data and fisheries management data (as is done in most other countries of the world), with the addition of fish counters used where they can be deployed.

Whilst there are records of catch data since 1952, the data collected is significantly inadequate and incomplete, for example:

- a) There is no system of audit of any of the information on rod fisheries that is collected and submitted. Net fisheries can be audited on the basis of their records and a corresponding approach should be adopted for rod fisheries.
- b) There are no statistics on fishing effort for rod fisheries (as distinct from netting fisheries) so that the interpretation of the rod catch statistics is severely impaired. These statistics are already recorded by fisheries proprietors, and should be part of Marine Scotland's normal monitoring dataset.
- c) There are no Scottish statistics for *Salmo trutta* except for the portion of the population that may choose to become migratory (i.e. sea trout). For those fish the catch statistics have the same short-comings highlighted for the salmon statistics. Additionally, the current data published by Marine Scotland does not include small migratory *Salmo trutta*, although the data is collected and was published in earlier times.
- d) There are no science-based conservation limits or maximum sustainable yields for fish catches on any Scottish river, despite the need for such figures as a guide to catch quota management (as for commercial sea fisheries).

e) There are no nationally published data on fisheries management, including on stocking or stock enhancement.

Page 70, Predator control.

This section appears anomalous (or possibly incorrect) in regard to the 'control' of seals. Surely, the same terms as apply to fish farms are adopted for fisheries, namely that all reasonable deterrent approaches should be considered before a licence to kill the seal is granted?

Page 70, Marine Planning Policies.

It is impossible to know how the last sentence in this paragraph – which relates to monitoring – can ever be applied. The fish farming sector has repeatedly highlighted the need for Marine Scotland to introduce a robust system of monitoring of migratory wild fish catches, i.e. one based on audited records of fishing effort and rod catches, as well as on fish traps, where they can be deployed. If such a monitoring system were in place it would provide a constant record of the actual (as distinct from the postulated) risk of fish farming and renewable energy developments on the wild fish catches.

Since there is an absence of such monitoring systems, it is impossible to use 'deploy and monitor' approaches to planning. The necessary data is not collected and held by Marine Scotland and because of the nature of the 'quasi-ownership' of Scottish fisheries, the relevant data cannot be collected or accessed by other marine developers. As a consequence, the planning development of two highly economically important Scottish marine industries – aquaculture and renewable energy - is potentially being put at risk by the lack of a proper national system for the monitoring and management of salmon and migratory fisheries.

Q18. Are there alternative planning policies that you think should be included in this Chapter?

See Q17 above.

Oil & Gas

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

No comment.

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

No comment.

Carbon Capture & Storage (CCS)

Q21. Do you have any comments on Carbon Capture and Storage, Chapter 10?

No comment.

Q22. Are there alternative planning policies that you think should be included in this Chapter?

No comment.

Offshore Renewable Energy

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

No comment.

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

SSPO would draw attention to the comments we made on the NPF3 MIR

"The infrastructure required to support the development of marine renewable energy generation equipment, and the equipment itself, may impact upon existing and future fish farm developments. The growth of the fish farm industry, which is supported by the Scottish Government, is already severely constrained by existing policies, designations and regulation. SSPO would be concerned that, by designating potential sites for on shore infrastructure as 'national development', the Scottish Government's ambition for the salmon farming industry to increase production significantly over the next 7 years (Draft National Marine Plan), would be further constrained.

SSPO would not wish to constrain the development of marine renewables. However the potential consequences for the salmon farming industry need to be considered carefully in the NPF, the NMP, the Regional Marine Plans and the Councils' LDPs. SSPO has set out ways in which policy makers could seek to redress the balance in its representations on: the Highland Wide Local Development Plan; the Orkney Islands Local Development plan; the Outer Hebrides Local Development Plan; the Argyll and Bute Local Development Plan, the Scottish Planning Policy; the Draft National Marine Plan and the Pilot Pentland Firth and Orkney Waters Marine Spatial Plan Planning Issues and Options paper."

SSPO would support Policy RENEWABLES 9.

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

No comment.

Recreation and Tourism

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

RECREATION AND TOURISM 1, 2 AND 3 – These will impact on SSPO members when proposing new and altering existing developments. These matters are already material to planning decisions under the Town and Country Planning Acts. It would be important to ensure that the requirement to take these matters into account is balanced by a requirement to take all other policies in the plan into account as well.

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

No comment.

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?

No comment.

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

Text - Aquaculture should be mentioned as an 'other sector' supported by shipping and ferries and/or ports and harbours.

TRANSPORT 4 - Should include aquaculture alongside renewables, fishing, recreation and tourism.

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

No comment.

Telecommunication Cables

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

No comment.

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

No comment.

Defence

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

No comment.

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

No comment.

Aggregates

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

No comment.

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

No comment.

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.

No comment.

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