

CONSULTATION QUESTIONS

Please identify the main area of interest you identify with :

- Nature Conservation
- Fisheries
- Industry/Transport
- Energy
- Aquaculture
- Recreation/tourism
- Academic/scientific
- Local authority
- Community group
- Public sector/Regulatory body
- Local Coastal Partnership

Other (Please state)

Comments

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

In general, we are content with the National Marine Plan. However, we believe the planning policies for aquaculture should give consideration to the potential impacts on recreation. The National Marine Plan currently lacks any consideration of this interaction and, in our view, this is an omission. We comment further on this issue below.

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

No comment

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?

No comment

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?

We welcome the objectives and policies that recognise the value of healthy and biologically diverse seas, the protection of historic assets, and the promotion and development of marine recreation.

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?

No

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?

We have a comment on Policy GEN13 on Designated Heritage Assets. We would like to see the protection to Designated Heritage Assets increased in line with the protection afforded to landscape and seascape (GEN 14), with suggested rewording as follows:

‘Substantial loss or harm to designated assets should be exceptional and should only be permitted if this is necessary to deliver social, economic or environmental nationally important benefits that clearly outweigh the harm or loss’.

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 comment

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?

No comment

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?

No comment

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

There is no reference to the impacts of aquaculture on recreation, which in our view is an omission. With significant expansion planned for the aquaculture industry in Scotland, there is a real risk of future conflict with recreation and leisure without an adequate planning policy in place.

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

Yes. We believe that this chapter should include an additional policy to protect recreation and tourism from adverse effects of aquaculture development, for example:

The location and scale of aquaculture development should avoid adverse effects on recreation and tourism.

Wild Salmon and Migratory Fish

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

No comment

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

No comment

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?

The incorporation of spatial information might make it easier for stakeholders to assess and provide impacts on proposed plans.

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

No comment

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?

As the UK National Governing Body for sub-aqua diving and snorkelling, we (the British Sub Aqua Club) welcome the Scottish Government's desire to ensure continued access to the marine and coastal resource for leisure and recreational use. As an indication of the popularity of the sport, the British Sub Aqua and the Scottish Sub Aqua Club together have around 4,000 members in Scotland, and the UK as a whole has around 50,000 active divers.

We are pleased to see recognition of Scotland as a world class diving location. Areas that are popular with scuba divers also include the Moray Firth and the sea lochs of the West Coast. The NMP may wish to note that underwater geology, and its interactions with habitats, species, and historic

assets, is also a key attraction to scuba divers.

The NMP may wish to note that not all scuba diving is carried out from a boat, and therefore does not always require harbour or launch facilities. Car parking, however, is usually essential.

We note that the chapter on recreation and tourism does not include snorkelling or sea swimming; in our view, these sports should also be mentioned in the chapter on Recreation and Tourism.

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?

We support the recognition of the importance of harbours and their facilities for water based recreation.

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

No comment

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?

N/A

Sustainability Appraisal

Q40. Do have any views/comments on the Sustainability Appraisal carried out for the NMP?

The Sustainability Appraisal does not include reference to the potential impact of aquaculture expansion on recreation. In our view, this is a significant omission.