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?

Mallaig and North-West Fishermen's Association Limited (MNWFA) are pleased to be able to respond to this consultation.

As a member of the Scottish Fishermen's Federation (SFF), MNWFA have participated in the development of a joint response on behalf of the constituent members of SFF. This response will be delivered by SFF.

MNWFA confirm that the views expressed in the SFF response to the consultation on Scotland's National Marine Plan should be regarded as the views of MNWFA.

MNWFA (through membership of SFF) has engaged with Marine Scotland in this project from its inception. Unfortunately a number of very important questions concerning fishing and its protection were never seriously addressed. These included clarification of the perception that marine planning would bring added layers of control to fisheries. Those controls appeared principally to relate to fishing effort, gear conflict and perhaps most seriously marine nature conservation.

Fishing is already subject to substantial controls which are enforced by Marine Scotland and emanate from the Common Fisheries Policy or National fisheries policy. It will be subject to further controls as a result of the implementation of MPA protection and the consequences of the Marine

Strategy Framework Directive and Stage II of the introduction of the Water Framework Directive. MNWFA can see no additional management advantages coming to fishing or the management of activities in Scotland's waters as a result of the introduction of a Marine Plan and in particular regional plans.

Sea fishing, which has a tradition almost as long as the existence of the Nation, deserves protection in the planning process in the same way as protection in the terrestrial planning process is granted to agriculture. Unfortunately the opposite is the case when it comes to be assessed against 'sustainable' development. The additional twist of the screw is that, fishermen will not receive any form of compensation for the loss of their livelihoods and the inevitable depression that that will bring to families and communities.

The SFF response to this consultation also serves to provide the MNWFA response to the questions that are posed in the rest of this document.

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

Comments

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?

Comments

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?

Comments

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?

Comments

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?

Con	nments	
07	De veu heve envesther comments en Chanters 4 22	
Q7.	Do you have any other comments on Chapters 1 – 3?	
Con	nments	
Gene	eral Planning Policies	
polic othe	Are the general policies in Chapter 4 appropriate to ensure an approstationable development and use of the marine area? Are there alternates that you think should be included? Are the policies on integration or planning systems appropriate? A draft circular on the integration was strial planning has also been published - would further guidance be ul?	ative n with
Con	nments	
Q9. appr	Is the marine planning policy for landscape and seascape an opriate approach?	
Con	nments	
in	Are there alternative general policies that you think should be included the second state of the second sec	ıded
Con	nments	
Guid	e to Sector Chapters	
Q11.	Do you have any comments on Chapter 5?	
	here other sectors which you think should be covered by the Nationane Plan?	al
Con	nments	
Sea l	<u>Fisheries</u>	
Q12.	Do you have any comments on Sea Fisheries, Chapter 6?	
Con	nments	

Q13. Are there alternative planning policies that you think should be included in this Chapter?				
Comments				
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?				
Comments				
Q15. Do you have any comments on Aquaculture, Chapter 7?				
Comments				
Q16. Are there alternative planning policies that you think should be included in this Chapter?				
Comments				
Wild Salmon and Migratory Fish				
Q17. Do you have any comments on Wild Salmon and Migratory Fish, Chapter 8?				
Comments				
Q18. Are there alternative planning policies that you think should be included in this Chapter?				
Comments				
Oil & Gas				
Q19. Do you have any comments on Oil and Gas, Chapter 9?				
Comments				
Q20. Are there alternative planning policies that you think should be included in this Chapter?				

Comments				
Carbon Capture & Storage (CCS)				
Q21. 10?	Do you have any comments on Carbon Capture and Storage, Chap	ter		
Com	ments			
	Are there alternative planning policies that you think should be inc s Chapter?	luded		
Com	ments			
<u>Offsh</u>	nore Renewable Energy			
Q23. Plans	Should the NMP incorporate spatial information for Sectoral Marines?)		
Com	nments			
Q24. 11?	Do you have any comments on Offshore Renewable Energy, Chapt	er		
Com	nments			
	Are there alternative planning policies that you think should be inc s Chapter?	luded		
Com	ments			
Recre	eation and Tourism			
Q26.	Do you have any comments on Recreation and Tourism, Chapter 12	2?		
Com	nments			
	Are there alternative planning policies that you think should be incised to the your think should be incised that you think should b	luded		
Com	ments			

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?

Com	nments			
Q29.	Do you have any comments on Transport, Chapter 13?			
Com	nments			
	Are there alternative planning policies that you think should be inclus Chapter?			
Com	nments			
Telec	communication Cables			
Q31.	Do you have any comments on telecommunications, Chapter 14?			
Com	nments			
	Are there alternative planning policies that you think should be inclus Chapter?			
Com	nments			
<u>Defer</u>	nce			
Q33.	Do you have any comments on Defence, Chapter 15?			
Com	nments			
Q34. Are there alternative planning policies that you think should be include in this Chapter?				
Com	nments			
Aggr	<u>egates</u>			
Q35.	Do you have any comments on Aggregates, Chapter 16?			
Com	nments			
	Are there alternative planning policies that you think should be inclus Chapter?			

Comments					
Business and Regulatory					
Q37. Please tell us about any potential economic or regulatory impacts, positive or negative, that you think any or all of the proposals in this consultation may have.	either				
Comments					
<u>Equality</u>					
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 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 carrie for the NMP?	d out				
Comments					