

## 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 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)

**CHARITY / 3<sup>RD</sup> SECTOR**

**Please note that Planning Aid for Scotland is providing responses to selected questions only.**

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

Planning Aid for Scotland (PAS) recognises the importance of marine planning and its topicality for people living in coastal areas; and supports the progress towards a National Marine Plan for Scotland. Development of Regional Marine Plans will provide further important opportunities for members of the public and community groups to engage with marine planning.

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

PAS believes that it is **essential that the complex relationship between marine planning and land use planning is clearly conveyed** in all relevant documents – and that this matter should be a priority. Further elaboration on when and how marine and land use planning may interact would also be useful.

[PAS would initially comment that the use of the phrase “*terrestrial planning*” in the section heading (and throughout the document) is not helpful – especially as the draft circular uses the more common “land use planning”. The term “*terrestrial*” might be used to differentiate from marine matters in a purely generic sense but the circular demands reference to the customary terminology of the actual statutory systems involved.]

While it is useful that the section *Marine Planning and Terrestrial Planning* appears early and reasonably prominently in the draft plan, further elaboration about the integration and how this will work in practice would be useful. **A key point that members of the public and stakeholders will need to grasp is the fact that the marine planning system has a wider remit than land use planning (ie to include licensing functions etc).** Many people who will have to engage with marine planning may be more used to engaging with the land use planning system and it would be useful if this section included a “compare and contrast” element explaining how marine and land use planning differ.

A diagram setting out the inter-relation of marine and land use planning would also be useful – this could also set out the relevant directives, legislation and documents giving further essential contextual information.;

**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?**

No comment

**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?**

This section is clearly links the Scottish Government's vision for marine planning to its national objectives. Its vision for the marine environment and the strategic objectives of the plan are equally clearly set out.

The strategic objectives might usefully make a reference to the draft NMP's approach to engagement and how members of the public and community groups can be involved – or this could be covered elsewhere in the plan (see comments on policy GEN9).

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

The definition of Sustainable Economic Growth in the draft NMP is slightly different from the one set out in the concurrent consultation on *Draft Scottish Planning Policy: Sustainability and Planning*. In terms of clarity for all stakeholders across marine and land use planning it would be useful for the same definition to be used.

### **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?**

The 3 separate but related policies GEN1, GEN2 and GEN3 may cause some confusion to stakeholders. The current additional consultation on Scottish Planning Policy is looking at defining a single policy on *Sustainability and Planning* - this might be a model worth considering with regard to the NMP.

GEN4 mentions *Scenario Mapping* – a term with which many people may not be familiar - without any clear explanation of what this might entail.

Further elaboration in the following text would be useful.

GEN8: the text following this policy is the first reference in the draft NMP to the important concept of *long-term public interest*. This could usefully be mentioned earlier in the document.

GEN9 - Engagement: PAS **strongly supports the inclusion of a dedicated policy on engagement** expressing a commitment to early and effective engagement. For any member of the public or stakeholder it would certainly be useful if the policy text or the following **paragraph set out the key opportunities for engagement with marine planning**. This might merit a separate section in the preceding chapters.

PAS has published its own [guidance on effective engagement](#) which is applicable to both land use and marine planning.

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

No comment

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

No comment

### **Guide to Sector Chapters**

PAS is not commenting on the sector specific policies.

**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?**

No comment

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

No comment

### **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?**

No comment

**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?**

No comment

**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?**

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?**

Comments

### **Sustainability Appraisal**

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

Comments





## Planning Aid for Scotland

Planning Aid for Scotland (PAS) is a national charity operating on social enterprise principles, working across Scotland to help people shape their communities and improve the way people engage with the planning system.

Planning Aid for Scotland believes in a plan-led system which gives clear direction to everyone. PAS, through its impartial [advice](#), [training](#) and [education](#) services, is actively involved in raising awareness of the opportunities for all people to be involved in planning. PAS is especially interested in planning policy and law; engagement and consultation; and involving all groups of society in a transparent and equitable way with planning matters.

### Unique

Planning is a vital public service and everyone in Scotland should be able to participate. PAS aims to provide everyone with the skills and information to engage positively with planning.

Reforms in 2009 to the Scottish planning system aim to make the system more inclusive and efficient. Everyone in Scotland should be able to participate in planning - but not everyone has the understanding and tools to do so. This is where PAS is in a unique position to help.

### Impartial

As an independent organisation, impartiality is PAS's most important guiding principle – one that will not be compromised. PAS delivers all its products with a professional and impartial approach.

### Volunteer-based

PAS's services are delivered by a network of more than 350 volunteers (all of whom are planning or built environment professionals). PAS also works with legal experts, architects, communications specialists, community artists and others, who offer their time and specialist knowledge to enable everyone to gain the skills and confidence to engage with Scotland's planning system.

Volunteering is at the heart of the way PAS does business. Volunteer time and energy is not a cheap way of delivering products – on the contrary, it represents an investment which then generates added value to our unique products.

### For Everyone

PAS provides a wide range of products and services – from a free planning advice service to tailored training products. PAS has developed services for everyone – planning professionals, local authorities, elected members, community councils, young people, and for members of the public who are simply interested in how their town or city is changing.

## CONTACTS

Planning Aid for Scotland would be pleased to respond to any queries with regard to these representations and is always willing to consider a joint venture with the promoters of the consultation document to take forward further research or training on any aspect of the subject which relates to the core business of PAS.



**Petra Biberbach**  
**Chief Executive**

Tel: 0131 220 9730

Mob: 07812 103967

[petra@planningaidscotland.org.uk](mailto:petra@planningaidscotland.org.uk)

[www.planningaidscotland.org.uk](http://www.planningaidscotland.org.uk)