

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)

Voluntary / 3rd Sector Organisation

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

RTPI Scotland welcomes the publication of the National Marine Plan (NMP) as a positive step to the development, management and coordination of Scotland's marine activity. The NMP together with the Planning Circular provide a guide to new emerging marine planning and licencing processes, and the strong relationship and interconnections between these processes and land use planning which must be developed to ensure that both regimes work closely to effectively plan for our marine, coastal and land resources.

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

The NMP itself does little to promote the integration of marine planning and land use planning systems, and does not go further than to acknowledge the requirement for integration. However, together with the Planning

Circular as a suite of documents, this requirement for integration is more clearly identified. (RTPI Scotland has made separate comments to the Draft Planning Circular.)

A key method of integration between both systems would be clearer acknowledgement within the NMP of the National Planning Framework 3 (NPF3) as the spatial plan for Scotland not only of policies and national spatial strategies, but also of National Developments within the NPF3 which will impact, or could potentially impact the coastal zone and marine areas. This approach would allow greater coordination between these national policy documents, and provide consistency of approach.

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?

RTPI Scotland recognises that the process of regional marine planning is in its infancy and that further understanding will come when Regional Marine Partnerships are fully set up and regional marine planning begins fully. We would like to see further clarity of the content of regional marine plans, and expect further guidance to be made available as and when Regional Marine Partnerships and subsequent plans become functional.

To manage expectations, an indication of timescales for the formation of regional plans would be useful for local authorities and other stakeholders in terms of preparation of time and monetary resources.

RTPI Scotland considers that the clear vision set out at the beginning of the NMP should be aligned to land use planning national policy and guidance (NPF3). This should include details on priorities – setting out which issues within the plan are of national importance and which should be taken up by regional plans as a priority.

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?

RTPI Scotland considers the objectives to be reasonable, however would comment that these objectives are very broad and consideration must be given to delivery and monitoring of these objectives. The monitoring of these will have resource implications.

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?

RTPI Scotland recommends that the NMP takes the same approach as NPF3 in setting economic and social objectives, and climate change objectives to ensure consistency of approach across processes which are inextricably connected in many ways, and will allow comparison, monitoring and sharing of evidence bases.

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

As previously stated, RTPI Scotland welcomes the NMP and its aspirations to provide a framework to achieve the Scottish Government's central purpose of sustainable economic growth within the marine environment. We support the strategic objectives, and would encourage further alignment in terms of wording, terminology, approach and objectives with the spatial plan for Scotland, the National Planning Framework 3, and would furthermore encourage continued liaison between Marine Scotland and Scottish Government Planning teams.

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?

RTPI Scotland welcomes this chapter, however we consider that acknowledgement of national planning policy NPF3 and SPP should be considered here to align the land use and marine planning systems further and ensure consistency of approach.

There may be value in including "areas for co-ordinated action" in the NMP

as included in NPF3. This would provide a focus for regional marine plans as well as the interaction between land use and marine planning systems. The Main Issues Report for NPF3 does this in considering the onshore implications of offshore development, however this is not currently a feature of the NMP.

GEN9 – Further clarification should be given in this policy on the level of engagement and consultation as part of the planning process, and acknowledgement of the links between land use and marine planning processes would be useful. This engagement must not only relate to offshore development, importantly including the onshore components of the development as well.

GEN10 – Mention of a shared evidence base between land use and marine planning could be included in this policy, avoiding duplication and encouraging consistency between both systems.

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

Q11. Do you have any comments on Chapter 5?

Are there other sectors which you think should be covered by the National Marine Plan?

RTPI Scotland considers that the NMP is readable with separate chapters on sectors, however it may be that some of the interactions between sectors is lost in this method. A stronger spatial focus to the plan would help to capture the important interactions between sectors.

Sea Fisheries

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

RTPI Scotland welcomes this policy in relation to the policies dealing with increased catch value whilst protecting the ecosystems, and the requirement of offshore developers to engage with fisheries industry interests in the preparation of plans for development.

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?

Greater emphasis should be placed on the role of land use planning in the consenting of aquaculture developments. The Planning Circular gives more background to the link and connections between the two systems, however the NMP could more clearly set out the requirements and the consenting bodies. At present no planning authority has given up control of decision making to marine planning, therefore the land use planning system still plays a key role in aquaculture,

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?

The diagram on Page 78 clearly shows that CCS has an onshore component, and therefore the land use planning system should be fully integrated in all policies for marine CCS. Further emphasis should be placed on NPF3 and the identified National Developments, ensuring consistency across both systems, and also reference should be made to the Local Development Plan and its importance in guiding development onshore. Both onshore and offshore elements of CCS must be considered jointly, not in isolation, including the planning authority and adequate and appropriate consultation methods with the community, and stakeholders.

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

See above.

Offshore Renewable Energy

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

RTPI Scotland considers that there should be greater consistency between land use planning and marine planning in terms of offshore renewables, and a greater link should be made between land use planning national policy NPF3 and the NMP – clarifying future investment decisions and timescales within which decisions will be made.

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

There is considerable overlap between land use and marine planning systems in the consideration and consenting of offshore renewable energy developments. The onshore implications and developments associated with any offshore development must be a consideration. Both onshore and offshore elements of a development must be considered together, not in isolation. This requires the integration of land use and marine planning systems, policies, processes and practice to avoid duplication and ensure that appropriate weight is given in the decision making process to the onshore development. Page 87 suggests that the Scottish Government will

work with developers to ensure an integrated strategy, and the Draft Planning Circular goes some way to provide ways of integration, however it is not only the developers who should be part of this discussion, local authorities, key stakeholders and the community must also be part of this process. Adequate and appropriate methods of consultation with the community as well as stakeholders and the local authority must be a consideration and should be included as part of the policies within the NMP and included as part of the Planning Circular.

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?

RTPI Scotland welcomes reference to the National Tourism Plan within this chapter, and considers that greater emphasis should be placed on this within the next draft of the NMP given that the National Tourism Plan has now been completed and published.

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

We consider that greater emphasis should be made to the balance between the natural environment and tourism and recreation development as this is a key consideration within the coastal zone with the natural environment attracting visitors to the area, and therefore a careful balance must be sought and this should form part of Chapter 12 policies.

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?

In designating national significant ports/harbours in the NMP, consideration must be given to the land use planning system, including the Local Development Plan, to ensure consistency across systems, particularly for ports and harbours which have a land use policy status. We would also expect that any designations of national significant ports/harbours would be subject to a consultation period.

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

RTPI Scotland welcomes this chapter and in particular the acknowledgement of the different and sometimes competing uses in terms

of transport for tourism, recreation and business taking place within Scottish seas and ports/harbours along Scotland's coastline. We support the mention of NPF National Developments but suggest that consideration should be taken within the text and policies of the onshore implications of these transport networks – further linking land use and marine planning systems particularly within the coastal zone where there is an overlap of both systems, leading to transparency and consistency of decision making.

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?

RTPI Scotland supports the cross-reference within Policy 4 to the land use planning system with the mention of Scottish Planning Policy, however we consider that the Local Development Plan should also be a consideration and should be explicitly mentioned alongside national land use planning policy to encourage integration and coordination at the coastal zone, and consideration of the onshore implications of offshore developments.

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?

No comment