CONSULTATION QUESTIONS

1. Do you support the development of an MPA network in Scotland's Seas?

Yes ☒ No ☐

The National Trust for Scotland strongly supports the development of an MPA network in Scotland's Seas. A well-designed network of MPAs, with appropriate management, has the potential to make a huge contribution to recovering the health of Scotland's Seas. We also strongly support the Scottish Government's commitment to a science-based approach to selection, designation and management of the MPA network.

Gaps

• We note that the pMPA (and PMF assignment) processes has not adequately addressed the protection needs of migratory and mobile species such as seabirds and cetaceans.

Management Options

- We advocate that management options must be chosen that will provide the most effective protection and enhancement outcomes for the marine conservation objectives of habitats and species of each pMPA, and the network more broadly.
- Zonal management that puts in place measures to protect only the remaining coverage of species and habitats is not enough, given the context of ecological decline documented by Scotland's Marine Atlas. We therefore strongly believe that protected zones should be adequate in size and shape so that species and habitats have the opportunity to recover and enhance beyond their present range.
- We are concerned about the use of the conservation objective 'conserve – feature condition uncertain' where there is no direct evidence of the condition of the feature. Where features are sensitive to human activity that overlaps the extent of the features, it would be correct to take the precautionary principle and assume that they would show signs of damage. This would imply that "recover" would be the appropriate objective. A "conserve" objective should only be used where evidence exists that a protected feature of an MPA is in good condition.

Individual possible Nature Conservation MPAs

2. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Clyde Sea Sill* possible Nature Conservation MPA?

Designation: Yes ☒ No ☐

Management Options: Yes ☐ No ☐

Socioeconomic Assessment: Yes ☐ No ☐

All of the above: Yes ☐ No ☐

3. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *East Caithness Cliffs* possible Nature Conservation MPA?

Designation: Yes ☒ No ☐

Management Options: Yes ☐ No ☐

Socioeconomic Assessment: Yes ☐ No ☐

All of the above: Yes ☐ No ☐

4. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *East of Gannet and Montrose Fields* possible Nature Conservation MPA?

Designation: Yes ☒ No ☐

Management Options: Yes ☐ No ☐

Socioeconomic Assessment: Yes ☐ No ☐

Comments

All of the above: Yes ☐ No ☐

Comments

5. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Faroe-Shetland sponge belt* possible Nature Conservation MPA?

Designation: Yes ☒ No ☐

Management Options: Yes ☐ No ☐

Socioeconomic Assessment: Yes ☐ No ☐

Comments

All of the above: Yes ☐ No ☐

6. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Fetlar to Haroldswick* possible Nature Conservation MPA?

Designation: Yes ☒ No ☐

This site is adjacent to NTS properties at Daaey and Qui Ness and Swinna Ness on Unst and is immediately adjacent to a further property on Yell. We support the boundary to protect black guillemot; circalittoral sand and coarse sediment communities; horse mussel beds; kelp and seaweed communities on sublittoral sediments; maerl beds; shallow tide-swept coarse sands with burrowing bivalves.

Management Options: Yes ☒ No ☐

We support the measures to prevent the use of towed/active gear in areas with features that are susceptible to damage (maerl beds, horsemussel beds, shallow tide-swept coarse sands with burrowing bivalves, kelp and seaweed communities on sublittoral sediment, shallow tide-swept coarse sands and circalittoral sand and coarse sediment communities). The existing scallop dredging restrictions are very helpful but should be extended to cover the known extent of the features listed with a buffer area to enable their recovery. They should also be extended to include all

mobile fishing gear.

Socioeconomic Assessment: Yes ☐ No ☐

All of the above: Yes ☐ No ☐

Comments

7. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Hatton-Rockall Basin* possible Nature Conservation MPA?

Designation: Yes ☒ No ☐

Management Options: Yes ☐ No ☐

Socioeconomic Assessment: Yes ☐ No ☐

All of the above: Yes ☐ No ☐

8. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Loch Creran* possible Nature Conservation MPA?

Designation: Yes ☒ No ☐

Management Options: Yes ☐ No ☐

Socioeconomic Assessment: Yes ☐ No ☐

All of the above: Yes ☐ No ☐

9. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Loch Sunart* possible Nature Conservation MPA?

Designation: Yes ☒ No ☐

Management Options: Yes ☐ No ☐

Socioeconomic Assessment: Yes ☐ No ☐

All of the above: Yes ☐ No ☐

10. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Loch Sunart to the Sound of Jura* possible Nature Conservation MPA?

Designation: Yes ☒ No ☐

Comments

Management Options: Yes ☐ No ☐

Comments

Socioeconomic Assessment: Yes ☐ No ☐

Comments

All of the above: Yes ☐ No ☐

Comments

11. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Loch Sween* possible Nature Conservation MPA?

Designation: Yes ☒ No ☐

Management Options: Yes ☐ No ☐

Socioeconomic Assessment: Yes ☐ No ☐

All of the above: Yes ☐ No ☐

12. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Lochs Duich, Long and Alsh* possible Nature Conservation MPA?

Designation: Yes ☒ No ☐

The boundary and area of the Lochs Duich, Long and Alsh pMPA is fully supported. The pMPA exhibits the most significant population of flame shells recorded in Scotland (and possibly the world), and is the only known loch with detected fan mussel populations. The pMPA also represents the most significant remnant burrowed mud communities in sheltered and shallow sea lochs of Scotland. We note this pMPA overlaps with a previously designated SAC (primarily for protection of reef habitat) and management will need to refer to, and align with, the objectives of this SAC.

Management Options: Yes ☐ No ☒

We believe that the conservation objectives for the protected features within the Lochs Duich, Long and Alsh pMPA should be changed to 'recover' for all features in recognition of the fact that many of them are already damaged. Management activities associated with deep water burrowed mud habitat requires revision. We support and encourage designation of zones prohibiting all forms of disturbance by mechanical and static gear, anchors, moorings diver-operated hydraulic methods, and expansion of new aquaculture ventures to ensure sizable proportions of flame shell, fan mussel and burrowed mud communities are fully protected from disturbance and have opportunity for future enhancement. We particularly support closure of activities that impact on flame shell beds in the Kyle Akin area, and this management regime should be extended to deeper water habitats.

Socioeconomic Assessment: Yes ☒ No ☐

The socioeconomic impact data presented in the BRIA indicates the relatively small displacement costs (£97,000 - £220,000 pa) by restricting damaging activities will be outweighed by the medium to long term benefit of protecting the ecological integrity of the pMPA so it can continue to provide ecosystem services to Scotland's inshore waters. It is likely that the existing creel fishery will benefit from reduction in the use of mobile gear. With the protection and enhancement of benthic habitats, there is likely to be improvement in recreational fish catch in the medium to long term. Published data by Kenter et al (2013) on the socioeconomic benefits of the Lochs Duich, Long and Alsh pMPA that will be gained from local and visiting recreational anglers and divers (with likely flow on to local community businesses) estimates a potential income of up to £20 million based on a willingness to pay survey evaluation under a scenario that the pMPA is afforded the higest levels of protection. There are also important non-use values of the pMPA. NTS has been providing interpretation on the value of the SAC for many years and visitors regularly comment on their support for it.

All of the above: Yes ☒ No ☐

The congruence of the pMPA boundary with that of the SAC will bring benefits to the management of both. In particular, the inclusion of the deep water habitats will ensure that the whole loch system can be managed together and will greatly simplify and enforcement measures necessary. It will also reduce the risk of damage to adjacent areas of reef habitat.

13. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Monach Isles* possible Nature Conservation MPA?

Designation: Yes ☒ No ☐

This site represents the nearest island to the St Kilda World Heritage Site, owned by NTS. We strongly support the designation of this pMPA. The proposed site boundaries hold a significant proportion of Scotland's Black Guillemot population.

Management Options: Yes ☒ No ☐

We strongly support the management option to remove or avoid set nets from within the site as this will benefit both the local Black Guillemot population as well as seabirds visiting from nearby colonies such as St Kilda.

We strongly support the management measure to reduce or avoid the spread of mammalian predators. NTS already implements a Biosecurity plans for St Kilda with a similar objective.

Socioeconomic Assessment: Yes ☐ No ☐

All of the above: Yes ☐ No ☐

14. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Mousa to Boddam* possible Nature Conservation MPA?

Designation: Yes ☒ No ☐

Management Options: Yes ☐ No ☐

Socioeconomic Assessment: Yes ☐ No ☐

All of the above: Yes ☐ No ☐

15. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *North-east Faroe Shetland Channel* possible Nature Conservation MPA?

Designation: Yes ☒ No ☐

Management Options: Yes ☐ No ☐

Socioeconomic Assessment: Yes ☐ No ☐

Comments

All of the above: Yes ☐ No ☐

16. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *North-west Orkney* possible Nature Conservation MPA?

Designation: Yes ☒ No ☐

Management Options: Yes ☐ No ☐

Socioeconomic Assessment: Yes ☐ No ☐

All of the above: Yes ☐ No ☐

17. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *North-west sea lochs and Summer Isles* possible Nature Conservation MPA?

Designation: Yes ☒ No ☐

The North-west sealochs and Summer Isles pMPA includes the seas immediately around the NTS property of Inverewe Gardens and the foreshore which is owned by NTS. We fully support the boundary and features of the pMPA. This pMPA contains an extraordinarily wide range of species and habitats at diverse scales, including the most northerly records of flame shell bed in UK waters and all three types of sea pen.

We believe that seagrass beds should be added as a protected feature in the pMPA, particularly as only a part of the seagrass bed in Loch Gairloch is protected by the Loch Gairloch Fisheries Restriction Area (CA58).

Management Options: Yes ☒ No ☐

We would support the exclusion of mobile /active gear types and diver hydraulic methods from flame shell beds, maerl beds and maerl or coarse gravel with burrowing sea cucumbers. We support proposals to relocate the disposal site to an area of less sensitivity and further assessments to determine impact of the Loggie Bay anchorage and moorings in Loch Broom on flame shells beds.

Socioeconomic Assessment: Yes ☒ No ☐

It is likely that existing shell fisheries (hand-dived/creeling) and wildlife related tourism and sea angling will benefit from MPA designation. The wider economic potential of the region could benefit from improved marine nature conservation alongside terrestrial initiatives. NTS runs guided walks and provides interpretive material from its base at Inverewe and the sea forms an important area of interest for visitors. This indicates that it has considerable non-use values for visitors to the area that have not been captured by the previous economic assessments.

Inclusion of seagrass beds as a protected feature in this MPA could have additional socioeconomic benefits as they are important spawning grounds for herring and nursery habitat for small scallops, lobsters and crabs and small cod.

All of the above: Yes ☐ No ☐

Research is required to investigate the Interactions between active/mobile gear and northern featherstar aggregations, kelp and seaweed on sublittoral sediments and circalittoral muddy sand communities.

18. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Noss Head* possible Nature Conservation MPA?

Designation: Yes ☒ No ☐

Management Options: Yes ☐ No ☐

Socioeconomic Assessment: Yes ☐ No ☐

All of the above: Yes ☐ No ☐

Comments

19. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Papa Westray* possible Nature Conservation MPA?

Designation: Yes ☒ No ☐

Comments

Management Options: Yes ☐ No ☐

☐

Comments

Socioeconomic Assessment: Yes ☐ No ☐

Comments

All of the above: Yes ☐ No ☐

Comments

20. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Rosemary Bank Seamount* possible Nature Conservation MPA?

Designation: Yes ☒ No ☐

Management Options: Yes ☐ No ☐

Socioeconomic Assessment: Yes ☐ No ☐

All of the above: Yes ☐ No ☐

21. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Small Isles* possible Nature Conservation MPA?

Designation: Yes ☒ No ☐

NTS owns the islands of Canna and Sanday and fully supports the boundary and area of Small Isles pMPA and also all of the listed PMFs (black guillemot; burrowed mud; circalittoral sand and mud communities; fan mussel aggregations; horse mussel beds; northern feather star aggregations on mixed substrata; northern sea fan and sponge communities; shelf deeps; white cluster anemones), especially the fan mussel, for which this is the best known site in the UK. We also recommend that the future designation should include the Basking Shark as a PMF. We also recommend further work to consider the addition of Minke Whale as a PMF. We note this pMPA overlaps with two designated SPAs and management will need to refer to, and align with, the objectives of the SPAs.

Management Options: Yes ☐ No ☒

NTS believes that the conservation objectives for the protected features within the Small Isles pMPA should be to 'recover' for all features. There is evidence that the existing deep water communities, notably fan mussels, were much more extensive in the past and this site provides the best opportunity to expand this highly threatened community. We support and encourage designation of large zones in the Sound of Canna prohibiting all forms of disturbance by mechanical and static gear, anchors, moorings and expansion of new aquaculture ventures to ensure sizable proportions of sensitive communities are fully protected from disturbance

and have opportunity for future enhancement, particularly northern sea star, feather star, sponge communities, horse mussel and array of burrowed mud community PMFs. For the Sound of Canna, we also recommend that the licensed dredge spoil sites be rescinded.

Socioeconomic Assessment: Yes ☒ No ☐

The socioeconomic impact data presented in the BRIA indicates the displacement costs (£1.6 - £6 million pa) by restricting damaging activities will be outweighed by the medium to long term benefit of protecting the ecological integrity of the pMPA so it can continue to provide ecosystem services to Scotland's inshore waters. Published data by Kenter et al (2013) on the socioeconomic benefits of the Small Isles pMPA that will gained from local and visiting recreational anglers and divers (with likely flow on to local community businesses) estimates a potential income of up to £18.5 million pa based on a willingness to pay survey evaluation under a scenario that the pMPA is afforded the highest levels of protection. There are also important non-use benefits associated with the Small Isles pMPA. The site was the subject of a third party proposal from the Small Isles Community Council, indicating considerable support from the local population. Polls were conducted on the neighbouring islands of Rum and Canna and both showed a clear majority in favour of calling for an MPA. The NTS management plan for the island of Canna expresses a strong commitment to support the establishment of better protection of the outstanding resources in the adjacent sea.

All of the above: Yes ☒ No ☐

The Small Isles pMPA is the only representative site of burrowed mud communities outside sea lochs on the west coast of Scotland, and is the most significant relic deep water mud habitat in Scottish inshore waters. There is a rich and unique mosaic of habitats associated in one area due to the complex topography, resulting from the geological history. Proposed future aquaculture ventures will need to be rigorously assessed for potential impact, particularly with respect to water quality, erosion, sedimentation and disease. It is likely that there will be little or no potential for installations throughout large parts of the area

Further surveys in the peripheral deep basins adjacent to the Sound of Canna are needed in order to identify relict deep mud features and assess the potential for expansion of sensitive species.

As this is the best remaining area of deep burrowed mud in inshore waters it is essential to set up a monitoring programme that allows assessment of the expansion and recovery of the species and habitats in areas adjacent to the core zone

22. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *South Arran* possible Nature Conservation MPA?

Designation: Yes ☒ No ☐

NTS owns and manages properties at Brodick and Goatfell and fully supports the boundary of the pMPA to protect: burrowed mud; herring spawning grounds; kelp and seaweed communities on sublittoral sediments; maerl beds; maerl or coarse shell gravel with burrowing sea cucumbers; ocean quahog; seagrass beds; shallow tide-swept coarse sands with burrowing bivalves. This MPA will make a valuable contribution to protecting habitats representative of the areas of the Clyde.

Management Options: Yes ☐ No ☐

We believe that the use of towed/active gear should be removed from maerl beds, maerl or coarse shell gravel with burrowing sea cucumbers and seagrass beds and ocean quahog habitat. In order to ensure that burrowed mud features are protected and enhanced, towed/active gear should also be removed from those features. This would contribute to both the pMPA meeting its conservation objectives and the water body meeting Good Ecological Status. The experience with the no-take zone in Lamlash Ban has been very positive and this measure should be extended into other parts of the pMPA

Socioeconomic Assessment: Yes ☒ No ☐

The potential value of the South Arran pMPA to divers and anglers has been estimated at £8.3million to £17.5million based on willingness-to-pay measures (Kenter *et al*, 2013).

All of the above: Yes ☐ No ☐

23. Do you have any comments on the case for designation, management options and socioeconomic assessment for *The Barra Fan and Hebrides Terrace Seamount* possible Nature Conservation MPA?

Designation: Yes ☒ No ☐

NTS owns this islands of Berneray, Mingulay and Pabbay which are the nearest land to the pMPA. We fully support the boundary and area of the Barra Fan & Heb Ter Seamount on the basis of the information provided. The seamount is thought to be significant to the health of Scotland's seas due to its effect on movement of underwater currents, which bring food to the area. The resulting rich diversity supports many fish species and is probably an important source of food for the large seabird colony on Mingulay and Berneray.

Management Options: Yes ☐ No ☐

We support conservation objectives for the protected features within the pMPA to 'conserve' for all features. Whilst we recognise uncertainty in the evidence of the condition of the seamount habitat, the area is likely to be enhanced by restriction of damaging activities by mechanical and static gear (e.g. otter trawling,). We also

advocate that these activities do impact on PMFs such as burrowed mud, offshore deep sea muds, and offshore subtidal sands and gravels and their constituent species.

There is limited attention in the Management Options Document concerning pelagic trawling and purse seining activity, and as such no informed assessment can be made regarding sustainable harvesting of associated pelagic and demersal fish species. We further support and encourage designation that prohibits all forms of future disturbance by mining and exploration, and new oil and gas facilities, particularly with respect to Scotland's vision for a full shift to sustainable energy and reduction in carbon footprint.

Socioeconomic Assessment: Yes ☒ No ☐

The socioeconomic impact data in the BRIA report indicates that relatively modest displacement costs for commercial fisheries (£2.9 - £3.7 million pa) that were able to be evaluated would be most pronounced by prohibition of pelagic fishing activity, which should be managed according to wider area and quota management. As indicated in the comments under Management Options Report, it is difficult to make informed comment on the contribution of the Barra Fan & Heb Terrace Seamount pMPA to pelagic and demersal fish stocks, and associated fishing activity options. Relatively modest displacement costs associated with fisheries with habitat damaging activities that employ bottom mechanical gear will be outweighed by the med-long term benefit of protecting the ecological integrity of the pMPA so it can continue to provide ecosystem services to Scotland's offshore waters.

All of the above: Yes ☐ No ☐

Representative seamount habitat ecosystems are essential for Scotland's MPA network due to their biological diversity and important ecosystem drivers. Seamount ecosystems are relatively uncommon worldwide. There are concerns on the negative impact of fishing on seamount ecosystems, with well-documented cases of stock decline, for example orange roughy decline due to overfishing in the vicinity of seamounts off Tasmania. Ecological damage is mainly caused by bottom trawling, and large demersal netting which exploit populations of fish that exhibit mass aggregation behaviour in the vicinity of seamount seascapes.

24. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Turbot Bank* possible Nature Conservation MPA?

Designation: Yes ☒ No ☐

Management Options: Yes ☐ No ☐

Socioeconomic Assessment: Yes ☐ No ☐

All of the above: Yes ☐ No ☐

25. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Upper Loch Fyne and Loch Goil* possible Nature Conservation MPA?

Designation: Yes ☒ No ☐

Comments

Management Options: Yes ☐ No ☐

Comments

Socioeconomic Assessment: Yes ☐ No ☐

Comments

All of the above: Yes ☐ No ☐

Comments

26. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *West Shetland Shelf (formerly Windsock)* possible Nature Conservation MPA?

Designation: Yes ☒ No ☐

Management Options: Yes ☐ No ☐

Socioeconomic Assessment: Yes ☐ No ☐

All of the above: Yes ☐ No ☐

27. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Wyre and Rousay Sounds* possible Nature Conservation MPA?

Designation: Yes ☒ No ☐

Management Options: Yes ☐ No ☐

Socioeconomic Assessment: Yes ☐ No ☐

All of the above: Yes ☐ No ☐

Choices to represent features in the MPA Network

28. Recognising the scientific advice from JNCC included alternatives for representing offshore subtidal sands and gravels, ocean quahog and shelf banks and mounds in the Southern North Sea, do you have a preference or comments on the following combinations to represent these features, bearing in mind Turbot Bank will need to be designated to represent sandeel in this region:

Firth of Forth Banks Complex ☒
Turbot bank and Norwegian Boundary Sedimentary Plain ☐
Or Firth of Forth Banks Complex, Turbot bank and Norwegian Boundary Sedimentary Plain ☐

The Firth of Forth Banks complex is an important feeding area for the large seabird colony on the nearby NTS property of the St Abbs National Nature Reserve. We fully support the boundary and area of the Firth of Forth Banks Complex pMPA. This pMPA represents the most diverse habitat mosaics and consituent marine species compared to the alternative pMPA options presented. The geographic location, and local physico-chemical drivers of the Firth of Forth Banks Complex have also led to the evolution of a relatively closed ecosystem processes that is not replicated by the alternative pMPA options. We support the JNCC advice that this pMPA scientifically presents the best option to meet Scotland's MPA Establishment Guidelines. The pMPA contains significant ocean quahog aggregations and offshore subtidal sands and gravels PMFs. The resident sand eel population PMF is a central component to the ecosystem function and trophic food chain of the area and requires high levels of protection. The area is particularly important for seabirds and seals, which have been locally in decline for the last 10 years. Whales and dolphins are also users of the area. It is recommended that PMFs to be added to this pMPA include seals and seabirds.

29. Do you have any comments on the case for designation, management options and socioeconomic assessments for the preference you have indicated in the question above, regarding alternatives for representing offshore subtidal sands and gravels, ocean quahog and shelf banks and mounds in the Southern North Sea?

Yes ☒ No ☐

We support conservation objectives for the protected features within the Firth of Forth Banks Complex pMPA to 'conserve' for all features. We further support and encourage designation of large zones prohibiting all forms of disturbance by mechanical and static gear to ensure sizable proportions of sensitive communities are fully protected from disturbance and have opportunity for future enhancement. Proposed offshore renewable licences for wind farm construction must be undertaken on the basis of stringent and transparent EIA process and independent recommendations. Currently, there is minimal information on the impact of wind farms on this ecosystem type and its constituent features. Aside from the impact to benthic PMFs due to the ecological footprint of these built assets, aerial turbine blades may impact populations of seabird species such as gannets.

The socioeconomic impact data presented in the BRIA indicates that cost of displacing damaging commercial fisheries (£4 - £4.8 million). We note that the Firth of Forth Banks Complex pMPA option presents a higher cost than the Turbot Bank and Norwegian Boundary Sediment Plain pMPA option (£0.4 - £2.3 million), however the Norwegian Boundary Sediment Plain is not comparable in ecological significance to the Firth of Forth Banks Complex. The socioeconomic impact data presented in the BRIA forecasts a £48 million loss of revenue for future wind farm development in the Firth of Forth Banks Complex pMPA which we strongly argue misrepresents the worst case scenario for loss of revenue to the renewables industry. This analysis does not consider or elaborate on alternative site and micro-sitting opportunities. The calculation and presentation of this data requires revision

and further explanatory context.

The Firth of Forth Banks Complex pMPA is the preferred option and is the only fully supported option for designation as a MPA. Proposed wind farm development areas/sites should be explored outside the pMPA boundaries to minimise impact to the pMPAs unique and irreplaceable PMFs and closed ecosystem processes. The EIA/SEA/HRA must meet the conservation objectives of the pMPA. This will be determined by the construction and technology options presented by the developers, it is not possible for the community to make informed comment without this information at this time. A position of negotiation and options analysis for the developers is welcome.

30. Recognising the scientific advice from JNCC included alternatives for representing the burrowed mud feature in the Fladens, do you have a preference or comments on the following combinations to represent these features, bearing in mind the part of Central Fladen (known as Central Fladen (Core)) containing tall seapen (Funiculina quadrangularis) will need to be designated to represent tall seapen in this region:

Central Fladen pMPA only ☐
The tall sea-pen component of Central Fladen, plus Western Fladen ☐
Or the tall sea-pen component of Central Fladen, plus South-East Fladen. ☐

31. Do you have any comments on the case for designation, management options and socioeconomic assessments for the preference you have indicated in the question above, regarding alternatives for representing the burrowed mud feature in the Fladens?

Yes ☐ No ☒

32. Recognising the scientific advice from JNCC included alternatives for representing offshore subtidal sands and gravels, offshore deep sea mud, and burrowed mud in OSPAR Regions III and V, do you have a preference or comments on the following combinations to represent these features:

South-West Sula Sgeir and Hebridean slope ☐
Or Geikie slide and Hebridean slope ☐

33. Do you have any comments on the case for designation, management options and socioeconomic assessments for the preference you have indicated in the question above, regarding alternatives for representing offshore subtidal sands and gravels, offshore deep sea mud, and burrowed mud in OSPAR Regions III and V?

Yes ☐ No ☒

Sustainability Appraisal

34. Do you have any comments on the Sustainability Appraisal of the MPA network as a whole?

Yes ☐ No ☐

Comments

Final Thoughts

35. On the basis of your preferences on which pMPAs should be designated, do you view this to form a complete or ecologically coherent network, subject to the completion and recommendations of SNH's further work on the 4 remaining search locations?

Yes ☐ No ☐

Towards an ecological coherent network
The comments in the preceding sections have been confined to pMPAs that are adjacent to NTS properties or are believed to affect their ecological integrity, particularly their impact on seabird colonies on those properties. However NTS, as a member of LINK Marine Task Force, has reviewed the other pMPAs and has supported them through the LINK submission.

36. Do you have any other comments on the case for designation, management options, environmental or socioeconomic assessments of the pMPAs, or the network as a whole?

Yes ☐ No ☐

Conservation objectives

We are concerned about the use of the conservation objective 'conserve – feature condition uncertain' where there is no direct evidence of the condition of the feature. Where features are sensitive to human activity that overlaps the extent of the features, it would be correct to take the precautionary principle and assume that they would show signs of damage. This would imply that "recover" would be the appropriate objective. A "conserve" objective should only be used where evidence exists that a protected feature of an MPA is in good condition.