

CONSULTATION QUESTIONS

1. Do you agree with the proposals set out in the draft Scottish Marine Regions Order 2013?

Yes No

If no, please explain why not and your suggested alternative(s).

Comments

Forth Ports believe that the proposed SE Region is too large to be deemed local and too small to be national; it is therefore an imperfect size. We note that originally there was an argument for this region as it matched the area for the inshore fisheries group – but these boundaries no longer match. The Forth and Tay are quite different regions, each with an existing Local Coastal Partnership. There are seven coastal local authorities in the Forth and a further 3 in the Tay, Fife being in both; creating a significant challenge for representation, just from a local authority perspective alone. The area also draws in multiple regions from SNH, SEPA and other organisations. We would suggest that the SE region should instead be two regions, one from Montrose to Fife Ness (as per the existing Tay Estuary Forum) and the other from Fife Ness to the border (as per the existing Forth Estuary Forum with the addition of East Lothian to the border). This would be in keeping with natural process boundaries, as mapped in the Coastal Cells Report for the then Scottish Office (1997 or so), the River Basin Management Planning sub-regions, and the TayPlan and SESPlan areas amongst other existing arrangements. The Forth and Tay each have an ‘identity’, whereas there is no obvious identity for a ‘SE Region’, the boundaries not being immediately obvious without consulting a map, similarly Dundonians and indeed those further north in Angus would not normally consider themselves to be in the south east.

We believe that there should be one National Marine Plan and that local groups could be convened where there are issues or aspects needing addressed, or where there are activities that it is deemed as helpful for the statutory undertakers and other interested parties work together and keep each other informed; much like the role of the existing local coastal partnerships.

We would also direct you to our previous submission on this topic in February 2011.

2. Do you have any further comments? In particular we are seeking views on

- the drafting of the Order;
- the co-ordinates establishing the marine region boundaries;
- the boundaries outlined at paragraph 8 above;
- the names of the regions suggested; and

- the illustrative map.

Comments

See above regarding the boundaries. Picking up on a comment above, we remain to be convinced on the appropriateness of the name South East Region, for areas as far north as Montrose; but that is more an issue for those communities.

3. Do you believe that the creation of Scottish Marine Regions discriminates disproportionately between persons defined by age, disability, sexual orientation, gender, race and religion and belief?

Yes No

4. If you answered yes to question 3 in what way do you believe that the creation of Scottish Marine Regions is discriminatory?

Comments