

CONSULTATION QUESTIONS

Q1. Do you agree with the recommended list of Priority Marine Features as the basis for targeting future marine conservation action in Scotland's seas?

If your response includes a suggestion to amend the list, please indicate the specific species and habitats that your comments apply to and, where possible, provide or reference any evidence or data sources which have influenced your comments.

Yes No

As the recommended PMF list is drawn from existing lists of habitats and species that are identified as priorities for conservation and they have clearly undergone a rigorous selection process. No additions or deletions are proposed.

General

Q2. Are there other issues that have not been highlighted in this consultation that you would like to mention?

Yes No

It is important that policy GEN12 in the draft National Marine Plan is explicit as to the status and the weight that should be attributed to PMFs in decision making. The following text is taken from the relevant section of the Orkney Islands Council response to draft National Marine Plan consultation:

The text supporting GEN12 states that '*the impacts of development and activities on the national status of other Priority Marine Features should be taken into account when decisions are being made and regional plans should take account of Marine Scotland guidance on safeguarding Priority Marine Features and seek to improve their status where appropriate. Mitigation, including alternative locations for development and/or activities, should be considered*'. This text needs to be clarified and potentially revised. It needs to be clear when referring to the 'national status' of PMFs, whether this is referring to where PMFs sit in the hierarchy of natural heritage protection (i.e. international, national or local) or the condition of the feature? The NMP needs to define the status of PMFs and the weight that should be attributed to them in decision making. This should be determined by considering the PMFs conservation status to establish relative importance within the existing hierarchy. It is not the role of regional marine plans to 'improve' the status (importance) of PMFs. Their status (importance) should be clearly defined at the national level. There is potential for regional plans to protect and potentially improve the condition of PMFs. Regional marine plans have a role in defining the location of PMFs within the marine region and setting out policies for how proposals affecting them will be assessed in relation to decisions by public authorities.

Marine Scotland's Marine Nature Conservation Strategy outlines the three pillar approach to conservation: species conservation, site protection and wider seas policies and measures, the NMP should provide further detail on how the three pillar approach should be addressed in marine plans. Appropriate ways to address wider seas policies and measures should be set out in the NMP, particularly in relation to appropriate measures within regional marine plans.

The reference to '*Marine Scotland guidance on safeguarding Priority Marine Features*' links to the current consultation paper on PMFs. This document outlines the purpose of PMFs and the process of identifying PMFs, it does not provide guidance on how they should be safeguarded in regional marine plans. The Scottish Government should provide this guidance within the National Marine Plan, or separately, with a hook to this guidance within the National Marine Plan.