

CONSULTATION QUESTIONS

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

Yes No

There is no doubt as to the quality and diversity of Argyll and Bute's coast and inshore waters, making our coastal area one of our prime assets which requires protection and wise management and is critical to our economic success. It is therefore vital that this resource is used sustainably and the Council welcomes the opportunity to comment on individual Marine Protected Area (MPA) proposals and an overall MPA network.

In responding to the additional questions below the Council has chosen to comment only on proposed MPA's that lie within the Argyll and Bute Council area or are of particular interest to our coastal communities. The proposals for the five pMPAs in Argyll and Bute coastal waters support the objectives of the Argyll and Bute Local Biodiversity Action Plan (LBAP) in that the features identified for protection are listed in the LBAP as priority habitats and species.

While the Council is supportive of the principle of MPAs, and the long term environmental and economic benefits that may arise from a well managed network, it is vitally important that the right balance is struck between environmental protection and socio-economic impact on marine activities and coastal communities.

The Council has found it difficult to weigh up the potential benefits and impacts, which is partially a result of the Business and Regulatory Impact Assessments (BRIA) estimating economic impact against different management scenarios which do not always match up with the Management Options papers. In addition the Management Options papers are not as specific as expected and a large number of management options identified as 'to be considered' results in a significant level of uncertainty as to the likely scope of management required and resulting economic consequences. This is particularly the case for the fishing industry given the wide range of management options proposed across the proposed MPAs.

The Council is also of the view that some of the predicted localised benefits identified in the individual BRIAs are speculative and based on a premise that features will always be degraded by human activity without MPA protection. This assumption is not justified for every MPA as some sites have been identified based on the presence of high quality features in the absence of MPA management.

The Councils Economic Development Action Plan and proposed LDP identify renewable energy development, aquaculture, commercial fishing and tourism & recreation as key economic growth sectors and our comments on the individual MPA proposals have therefore considered implications for these activities as well as the potential environmental and economic benefits from designation.

Overall, the proposed MPAs relevant to Argyll and Bute are considered unlikely to result in significant economic impacts on the marine renewable, aquaculture or tourism sectors but are likely to affect the commercial fishing sector. The fishing industry in particular have potential to gain from the long-term wider benefits of a well managed MPA network, but also have the most to lose in terms of potential restrictions on fishing activity and required changes to existing practices. There may be potential indirect benefits to tourism from MPA designation and any impact on the fishing industry may be partially mitigated by wider ecological and economic benefits if appropriate management, developed with the industry is implemented and successful.

Overall the Council is supportive of the pMPAs and has no significant objection to the 'recommended' management options for pMPAs within Argyll and Bute. Where we have concerns is over some of the management options 'to be considered' which may have potential for more significant economic impacts on activities both within individual pMPAs and cumulatively across all proposals in Argyll coastal waters and the Firth of Clyde. It is likely that some of these 'measures for consideration' will not be needed and that some of them may already be met through existing management processes. The Council therefore considers that management measures should be both practical and proportionate and take account of changes in management that have already been implemented by the fishing industry, including gear modifications, existing spatial measures and reductions in days at sea.

When fishery management measures are being considered for proposed MPAs in the Firth of Clyde the cumulative socio-economic impact on fishermen from Kintyre and their associated coastal communities should be considered carefully by Scottish Government, relating to the Clyde Sea Sill, South Arran and Loch Fyne and Loch Goil pMPAs. In addition, these measures will also need to be considered in relation to any wider management proposals that emerge from the Clyde 2020 project.

Based on figures provided in the Business & Regulatory Impact Assessments, the cumulative economic impact on fishing activity taking account of percentage of fishing likely to be undertaken by Argyll and Bute fishermen, is estimated at around £240,000/year or £4.3 million over a 20 year period. Looking at the three MPA proposals in the Clyde the potential economic impact is estimated at £135,000/year or £2.3million over 20 years. Considering MPA proposals that could affect Kintyre fishermen, the figures are estimated at £150,000/year or £2.6 million over 20 years.

The Council is also concerned about the potential for displacement of fishing activity as a result of MPA management and its associated economic and environmental consequences. We welcome recognition that this is something that needs to be carefully explored and would welcome the undertaking of work on this issue prior to Scottish Ministers making decisions on designation of MPAs.

The Council welcomes the commitment in the Management Options papers that discussion with those involved in fishing and other activities will be continued in order to improve understanding about the interactions between activities and proposed protected features, and where management measures are required, the development of these would be undertaken via discussion with relevant interests and informed by any detailed information on activities that can be made available.

The Council requests that Scottish Government give consideration to the potential for some form of marine 'compensation management scheme', akin to land based schemes which provide payment for agricultural practices benefitting biodiversity. While it is considered that this type of approach has added complications at sea as a largely shared resource, the potential for rewarding good stewardship with financial incentives is worth exploring as an option to help mitigate economic impacts on activities affected by MPA designation.

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

The Council has no objection to proposed features and case for designation for this proposed MPA.

Management Options:

Yes No

Renewables

There is an existing tidal lease in Sanda Sound, within the MPA boundary but the Management Options paper considers that this development will not significantly affect the MPA features. There is a larger tidal lease area to the North West of the MPA boundary and a draft plan option for tidal development (identified in the current Draft Sectoral Plans for Marine Renewables consultation) overlaps with the MPA. Restrictions on new marine renewable development would be limited to within 2km of Sanda and Sheep islands and therefore the recommended management options are not considered likely to impact the draft plan tidal area or the seabed lease to the north of the MPA.

Fishing

The Council supports the recommended management option to exclude pressures associated with set nets in areas used by black guillemots.

The Management Options paper advises that further management to reduce or limit pressures associated with mobile/active gear on areas of sand and coarse sediment should be considered. This habitat type is widely distributed throughout the MPA boundary and further management if needed may result in a reduction in fishing effort for trawling and dredging or zoning which would restrict fishing from some parts of the MPA.

Socioeconomic Assessment:

Yes No

The annual value of fisheries landings within the pMPA is estimated to be £874K. If 50% of the MPA was closed to mobile gear fishing the estimated annual economic impact is £110K/year, equating to £1.6 million over 20 years. It is noted that these are worst case estimates and that only a proportion (less than 50%) of fishing activity within the MPA is likely to be from Argyll and Bute based vessels.

All of the above:

Yes No

The Council's overall view is that the pMPA can be supported based on implementation of recommended management options and expected resulting implications for marine renewable development and fishing. Should further 'to be considered' management measures, relating to restrictions on mobile gear on sand and coarse sediment, be required the economic impact on the local fishing industry based in Kintyre will depend on the extent of restrictions and should be carefully considered by Scottish Government cumulatively with measures needed for other MPAs in the Firth of Clyde. See comments under Qu1 above.

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

Comments

Management Options:

Yes No

Comments

Socioeconomic Assessment:

Yes No

Comments

All of the above:

Yes No

Comments

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

Comments

Management Options:

Yes No

Comments

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

Comments

Management Options:

Yes No

Comments

Socioeconomic Assessment:

Yes No

Comments

All of the above:

Yes No

Comments

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

Comments

Management Options:

Yes No

Comments

Socioeconomic Assessment:

Yes No

Comments

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

Comments

Management Options:

Yes No

Comments

Socioeconomic Assessment:

Yes No

Comments

All of the above:

Yes No

Comments

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

The Council supports the case for designation for this proposed MPA and the value in protecting the flame shell beds in Loch Creran. Loch Creran is already a Special Area of Conservation which protects other forms of biogenic reef and the pMPA proposal is considered a sensible addition to protect what is a sensitive habitat to human activity.

Management Options: Yes No

The 'recommended' and 'to be considered' management options are supported and considered necessary to fully protect the proposed feature. The Council would wish to be involved in the finalisation of any management scheme for this pMPA if approved.

The Marine Resource Centre at Barcaldine is promoted as a key port/servicing site in the West coast cluster of infrastructure to support the marine renewable sector. The pMPA and proposed management is not considered a threat to further use and development of the site at Barcaldine.

There are existing statutory fisheries restrictions in the loch which are in place to protect the 'reef' features of the Loch Creran SAC. It is considered that it would be relatively straightforward to amend the existing fisheries order to restrict mobile gear fishing in areas of flame shell beds. The MPA if designated provides an opportunity to apply measures restriction hydraulic dredging and targeted collection of horse mussels from the whole of the loch, providing additional protection for the SAC features.

The Council is surprised that additional management is not recommended for moorings given the sensitivity of this habitat to physical disturbance. It is suggested that new mooring development could be managed by adding consideration of the flame shell bed feature to the existing moorings pack already in use to protect the SAC features.

Socioeconomic Assessment: Yes No

The proposed management measures are not considered likely to significant impact existing activities in the loch and therefore the economic impact is low.

All of the above: Yes No

Overall the Council supports the designation of this proposed MPA.

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

The Loch Sunart pMPA is proposed in order to conserve three specific habitats - flame shell beds found in the tidal narrows, aggregations of northern feather star, normally associated with deeper offshore habitats; and serpulid aggregations in Loch Teacuis. It is noted that the possible MPA overlaps with the subtidal element of the existing Loch Sunart SAC which is designated for rocky reef habitat and otters. The Council has no objection to the case for designation of this pMPA.

Management Options: Yes No

This pMPA is outwith Argyll and Bute but Loch Sunart is visited by Argyll and Bute fishermen, particular from Mull. The comments below therefore only focus on this activity.

The Council supports all recommended management measures which appear necessary to adequately protect the proposed features.

Socioeconomic Assessment: Yes No

The annual value of fisheries landings within the pMPA is estimated to be £21K, with 73% of these landings to Argyll and Bute ports. If 25% of the MPA was closed to mobile gear fishing the estimated annual economic impact is £1K/year, equating to £9K over 20 years. The economic impact of fisheries management measures is considered to be relatively low.

All of the above: Yes No

The proposed MPA is already designated as an SAC and activities relevant to Argyll and Bute are not considered likely to be significantly affected by proposed management measures. The Council therefore has no objection to the designation of this pMPA.

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

It is agreed that Skate are a species in need of protection and that the area of the possible MPA does encompass the main areas where large skate are commonly caught by recreational anglers. There is however little knowledge on the distribution of juvenile skate and where skate breed and lay egg cases.

The Data Confidence Assessment states that reproductively mature common skate are resident in relatively high numbers within a number of the deep glaciated channels and that there is also some evidence that the shallow reef areas within the MPA proposal are used by common skate for laying their egg-cases. However, there is no evidence to point toward specific parts of the proposal as nursery grounds for this species.

Management Options: Yes No

Management options which are supported

The Council fully supports the recommended management measures relating to exclusion of

bottom-set nets and longlines across the entire MPA, which may benefit marine mammals and spurdog as well as skate.

The Council is pleased to see no management restrictions on recreational angling for skate and supports the suggested further development of best practice, which will allow this economically important and sustainable activity to continue whilst providing essential information on the skate population.

Concerns of management options

The Council does have concerns however about the measures for further consideration relating to limiting use of mobile gear to ensure levels of mortality do not affect the long-term viability of common skate and about the potential for future management related to the protection of skate eggs.

The Management Options paper identifies that 'Common skate are at risk of capture in most mobile gears, even from a young age due to their size and shape. However, current fishing regulations mean that targeted fishing for the species is not allowed. Common skate may not be landed and should be returned to the sea as quickly as possible if taken as bycatch. Mortality of fish that have been returned to the sea is likely to be variable, but will depend on factors such as handling and the length of time exposed to air.'

The paper goes on to state that '*..the eggs of common skate are thought to be laid unattached on the seabed and are sensitive to the kind of physical impact and abrasion caused by dredges and trawls. However, relatively little is known about the breeding behaviour of common skate and the habitat preference for egg laying. Future management measures may therefore be best focussed on ways of further reducing fishing-related mortality. For example, through better handling of by-caught skate, gear modification and / or spatial measures that reduce the risk of by-catch of skate within the site*'. Should this MPA be designated the Council would wish to see measures relating to better handling of by-caught skate and gear modification considered prior to determination of whether spatial measures are required.

The Management Options paper also identifies that '*If research identifies critical time periods and habitat of specific importance for egg laying then temporal and / or spatial measures should be considered to protect common skate egg cases*.' There are therefore uncertainties as to whether future aquaculture development and fishing activities will be affected should significant areas where skate lay eggs be discovered and management for these sectors is required.

Activities not considered

The management options paper does not consider the potential for future subsea energy cables to support marine renewable development. If the offshore wind development off Tiree goes ahead it is likely that cables will need to cross through the pMPA.

Socioeconomic Assessment:

Yes No

The economic impact of the 'recommended' management measures are not considered significant but implementation of additional measure relating to reducing mobile gear fishing pressure and potential measures to protect skate egg laying areas may have a much greater economic impact.

The annual value of fisheries landings within the pMPA is estimated to be £1.2 million. If 50% of the MPA was closed to mobile gear fishing the estimated annual economic impact is £98K/year, equating to £1.4 million over 20 years. While the estimates are a worst case scenario, should this level of management be required the economic impact on fishing activity is not insignificant.

All of the above:

Yes No

It is agreed that Skate are a species in need of protection and that the area of the possible MPA does encompass the main areas where large skate occur in high numbers. However, there appears to be a high level of uncertainty over the likely future management options and potential for restrictions on economic activity, given the large scale of the MPA and fact that little is known about where the skate breed, lay eggs and whether there are specific nursery areas for juvenile skate. It is therefore suggested that this MPA should be kept as a search area until such time as additional research work has been completed on nursery/breeding areas. Mull Aquaculture & Fishermen's Association and Clyde Fishermen Association share these concerns and do not believe it is acceptable to designate an MPA without first understanding the full consequences for those likely to be affected.

MPA boundary

The Loch Sunart to Sound of Jura MPA is a very large area which includes several key harbour areas and ferry ports. The relatively small working areas around these harbour/ports are unlikely to be of any great significance for the proposed skate and geology features, and therefore to avoid any unnecessary complications for future essential harbour works, it is requested that should this MPA be designated, these areas are removed from the MPA boundary. It is noted that the proposed Oban harbour area has been excluded and this should also be considered at Tobermory and Craignure.

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

The Council recognises the overall biodiversity value of Loch Sween and supports the case for designation of this proposed MPA and the value in protecting the proposed features, in particular native oysters and maerl beds.

Management Options:

Yes No

The Council supports the identified management options for this pMPA but highlights that the likely level of restrictions on mobile and static gear fishing on burrowed mud and mixed sediment communities is unclear.

Socioeconomic Assessment:

Yes No

The annual value of fisheries landings within the pMPA is estimated to be £98K million. If 50% of the burrowed mud feature was closed to mobile gear fishing the estimated annual economic impact is £3K/year, equating to £51K over 20 years. Overall, the estimated economic impact of the potential management options is not considered significant in comparison to other MPA proposals.

All of the above:

Yes No

Overall, the Council supports this proposals given the biodiversity value of Loch Sween, the lower level of activity within the pMPA and subsequent lesser predicted economic impact.

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

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

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

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

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

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

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

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

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

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

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

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

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

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment:

Yes No

Comments

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

Comments

Management Options:

Yes No

Comments

Socioeconomic Assessment:

Yes No

Comments

All of the above:

Yes No

Comments

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

Management Options:

Yes No

Socioeconomic Assessment:

Yes No

All of the above:

Yes No

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

This pMPA is outwith Argyll and Bute but is fished by Argyll and Bute fishermen from the Kintyre coast. The Council notes that this pMPA has developed from an initial third party proposal from COAST, which has been assessed by SNH and judged to meet the selection guidelines as a proposed MPA.

The Council is aware of some concerns over the scientific evidence to support the inclusion of some benthic features and notes that while the Data Confidence Assessment identifies that there is high confidence that the proposed features are present, it appears that there is less confidence about the likely distribution of these features. It is also noted in the selection guidelines (2b) that the infaunal diversity level within the feature 'burrowed mud' varies considerably and it is therefore questioned as to whether this site represents a good example of burrowed mud within the network.

Management Options:

Yes No

The Council has only considered fishing activity as Argyll and Bute fishermen are known to fish

within this pMPA which is an area of relatively high fisheries value. The Council has no objection to the 'recommended' management measures but has concerns over the uncertainty of the scope of management options relating to burrowed mud and the likely resulting economic implications.

Socioeconomic Assessment: Yes No

The annual value of fisheries landings within the pMPA is estimated to be £950K. If 50% of the MPA was closed to mobile gear fishing the estimated annual economic impact is £114K/year, equating to £1.7 million over 20 years. While the estimates are a worst case scenario and only a proportion of fishing activity within the MPA is likely to be from Argyll and Bute based vessels, should this level of management be required the economic impact on fishing activity is not insignificant.

All of the above: Yes No

The Council's overall view is that the pMPA can be supported based on implementation of 'recommended' management options. Should further 'to be considered' management measures for fishing activity be required the economic impact on the local fishing industry based in Kintyre and associated coastal communities will depend on the extent of restrictions. It is considered important that the economic impact of management measures for the three MPA proposals within the Firth of Clyde are considered cumulatively as well as individually. See comments under Qu1 above.

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

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

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

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

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

The Council recognises the overall biodiversity value of upper Loch Fyne where there is good representation of multiple features, including burrowed mud, flame shell beds, horse mussel beds, ocean quahog and sublittoral mud and mixed sediment.

The overall case for designation is therefore supported but it is noted that the Data Confidence Assessment identifies there is a degree of uncertainty over presence and distribution of the ocean quahog, low or variable salinity habitats and sublittoral mud and mixed sediment features.

There is some inconsistency in the different documents for this pMPA as to whether the conservation objective for burrowed mud is 'conserve' or 'recover'. It is believed that it is the latter and this should be clarified and corrected.

Management Options: Yes No

The Council supports the 'recommended' management options for this pMPA, but feels there is significant uncertainty as to the scope of management options 'to be considered' and therefore the predicted economic impact on commercial fishing.

A voluntary agreement not to fish within parts of Loch Shira in order to protect fireworks anemone exists and designation of this MPA would provide an opportunity to formalise this agreement.

The Council has developed an Integrated Coastal Zone Management Plan for Loch Fyne which provides guidance on the future use and development of this area. The Council would wish to be involved in the development of any management plan/scheme should this MPA be designated.

Socioeconomic Assessment:

Yes No

The annual value of fisheries landings within the pMPA is estimated to be £92K. The estimated annual economic impact is £5K/year, equating to £80K over 20 years. These estimates are a worst case scenario, based on the full MPA being closed to dredging, all mobile gear fishing restricted across the burrowed mud, horse mussel and flame shell bed features and expansion of static gear fishing limited.

Should this level of management be required the overall economic impact is less significant than other MPA proposals in the Firth of Clyde.

All of the above:

Yes No

The Council's overall view is that the pMPA can be supported based on implementation of 'recommended' management options. Should further 'to be considered' management measures for fishing activity be required the economic impact on the local fishing industry based in Kintyre and associated coastal communities will depend on the extent of restrictions. It is considered important that the economic impact of management measures for the three MPA proposals within the Firth of Clyde are considered cumulatively as well as individually. See comments under Qu1 above.

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

Comments

Management Options:

Yes No

Comments

Socioeconomic Assessment:

Yes No

Comments

All of the above:

Yes No

Comments

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

Comments

Management Options:

Yes No

Comments

Socioeconomic Assessment:

Yes No

Comments

All of the above:

Yes No

Comments

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

No comments

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

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.

No comments

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

No comments

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

No comments

Sustainability Appraisal

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

Yes No

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

Please see comments in response to question 1 above

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

The Council wishes to make clear that while the responses to the questions above are the overall Council response, these are not necessarily universally supported opinions by all elected members as there was significant division on views for some pMPA proposals. The table below reflects a number of concerns raised by our four Area Committees and the differences in opinion on some aspects.

Area	No. of pMPAs	Main points
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	within area	
Mid Argyll, Kintyre & the Islands	4	<ul style="list-style-type: none"> • There should be sensitive targeting of measures across all MPAs. • The potential economic impacts added up across all Argyll and Bute MPA proposals are significant. • The Loch Fyne part of the 'Upper Loch Fyne and Loch Goil pMPA' should not be supported as no evidence that existing activity is affecting upper Loch Fyne. • Cod Recovery Plan and other fisheries measures are already having an economic impact on fishing communities. MPA management will be an additional restriction. • Concern over scale of Loch Sunart to Sound of Jura proposal and potential for significant economic impacts. • Some support for recommendation (3.6.9) that the Loch Sunart to Sound of Jura MPA be treated as a search area until further research is completed, but also some views that this proposal should not be supported in any way. • Question over whether the Clyde Sea Sill MPA would affect renewable development & existing tidal leases.
Oban, Lorn & the Isles	2	<ul style="list-style-type: none"> • Loch Sunart to Sound of Mull pMPA - concerns over scale, lack of scientific evidence and uncertainty over management and socio-economic impact. • Support for recommendation to treat Loch Sunart to Sound of Mull proposal as a search area. • Question over need for two designations covering Loch Creran. • Concern over whether Loch Creran pMPA would limit potential use/growth of Barcaldine MRC as a renewable servicing site.
Bute & Cowal	1	<ul style="list-style-type: none"> • Proposals do not go far enough and support expressed for MPAs to be treated as No Take Zones. • Proposals will not protect fish populations in the Clyde from unsustainable fishing practices. • Existing No Take Zones such as Lamlash Bay have demonstrated environmental and socio-economic benefits. • Would compensation scheme (see 3.6.6) result in any financial cost to the Council? • What are financial costs of delivering management plans/schemes?
Helensburgh & Lomond	0	<ul style="list-style-type: none"> • Potential opportunity for long-term benefits to Clyde ecosystem and tourism but keen to ensure no significant impact on wider economic activity.

Given the potential for economic impacts on established marine activities and coastal communities reliant on these activities, the Council requests that Scottish Government give full consideration to the potential for some form of marine 'compensation management scheme', akin to land based schemes which provide payment for agricultural practices benefitting biodiversity. While it is considered that this type of approach has added complications at sea as a largely shared resource, the potential for rewarding good stewardship with financial incentives is worth exploring as an option to help mitigate economic impacts on activities affected by MPA designation.

Please also see comments in response to question 1 above.