

## CONSULTATION QUESTIONS

Please identify the main area of interest you identify with :

- |                               |                                     |
|-------------------------------|-------------------------------------|
| Nature Conservation           | <input checked="" type="checkbox"/> |
| Fisheries                     | <input type="checkbox"/>            |
| Industry/Transport            | <input type="checkbox"/>            |
| Energy                        | <input checked="" type="checkbox"/> |
| Aquaculture                   | <input type="checkbox"/>            |
| Recreation/tourism            | <input checked="" type="checkbox"/> |
| Academic/scientific           | <input type="checkbox"/>            |
| Local authority               | <input type="checkbox"/>            |
| Community group               | <input checked="" type="checkbox"/> |
| Public sector/Regulatory body | <input type="checkbox"/>            |
| Local Coastal Partnership     | <input type="checkbox"/>            |

Other (Please state)

Comments

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

I think that the objectives set out at the beginning of Chapter Two together with the expected national outcomes are EXCELLENT. But there are places where your terminology is not clear, for example, does the term "marine businesses" include existing fisheries as well as new marine business in renewable resources? (page 15)

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

The term 'land planning' smacks of glossing over the real issue, which surely is how marine planning may disturb existing land (as well as sea) usage. What exactly does land planning mean in any case? It might be helpful if the final version of the consultation document makes this term clearer – I can imagine it might mean use of land for landfill, or for building wind turbines but it is by no means explicit in the current document.

**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?**

To date I am unaware of any Regional Marine Planning in Argyll, despite the fact that a mast to monitor the feasibility of an array of wind turbines off the west coast of Islay is to be erected next year; surely the purpose of a Regional Marine Plan must include in its aims and objectives the provision of information and consultation at local level. How else can the RMP get to know the extent of potential issues? Given the extent of tidal and wind projects around the island of Islay, information needs to be provided in written form to every household on the island plus there needs to be a public forum where people can investigate and debate issues with informed representatives. To date there has been one SMALL consultation exercise, for which there was very little notice given. I do not know who may have organised it – I was unable to attend. There has to be better guidance in regard to consultation exercises. These are not acceptable when they are merely presentations, with short time for questions/answers.

**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?**

**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?**

I think there is an intrinsic problem here: that development of the proposed wind turbine array and protection/health of the marine and land environment are for the most part incompatible. This is not to say that there should not be development of renewable energy resources; but it should be *transparently* recognised that this is hard to achieve without creating some degree of interference with the existing economy and natural habitat of the locality.

**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?**

I understand from your document that the basic rationale for marine planning is to meet targets that have been set internationally for climate change and the focus is effectively on creating renewable resources. You do confess that there are certain practices in fishing which are not compatible with your overall objectives. You fail to say that more should have been done in the past, and more must be done in the present and future to ensure sounder ecological practice. In Islay we have known and witnessed the de-nuding of the seabed by scallop fishing practice and nothing has been done about it. Even now, your focus is on renewable energies rather than preventative measures to ensure better practice in current sea usage.

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

My main comment is lack of consultation at local level. This is something that we have experienced ever since the introduction of the Highland and Islands Development Board in 1965 (later to become the H/I Enterprise Board). Time after time, “innovative projects” have been backed without sufficient consultation at local level. We have had millions spent on a jetty for boat-repair at Portnahaven, as well as on a modernised pier at Bruichladdich, neither of which have proved effective, and had any local consultation taken place would NOT HAVE HAPPENED, at least not in the form taken.

**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?**

Perhaps here I am beginning to understand what is meant by ‘land planning’ or as it is put here, ‘terrestrial planning’. I think it means where similar efforts are being made on land to create renewable energy resources. Do you get my point? You are not clear about this.  
YES, I do think you need to think very carefully about the expenditure that the current Islay wind and tide marine projects will cost versus other possibilities. Already a commendable amount has been spent in our area on ensuring better home insulation. However incentives for installing renewable resources in the home are heavily in favour of the wealthy. *I believe that there is a huge potential for community participation AND ownership of*

*renewable resources*. In rural Scotland there could be a very positive response if this was on offer, meaning that villages and townships across rural areas of Scotland might co-develop renewable resources for their own locality (with the support of government funding, released by NOT investing in massive schemes whose feasibility is doubtful). One big advantage of such an approach is that you do away with “Not in my backyard” responses, when schemes are superimposed on localities by central government/agencies. You would then be able to focus on renewable energy resources for our two main cities, Edinburgh and Glasgow.

**Q9. Is the marine planning policy for landscape and seascape an appropriate approach?**

Your recommend that any development should be of economic benefit to the local community. Here you take a lot for granted. You assume that the local population will be employed in the structure of renewable resources – many of those employed will require skills and training that locals do not have, therefore these people will be employed from elsewhere. Furthermore, the structural work will only be of short-term benefit. In the longer term, just how many jobs will be created for the island community? You need to be precise with projections in this area.

**Q10. Are there alternative general policies that you think should be included in Chapter 4?**

Elsewhere I have already suggested that there should be local participation AND OWNERSHIP in projected plans. You state under General Policy 9 that “early and effective engagement should be undertaken with the general public and all interested stakeholders in planning and consenting processes.” Here on Islay we have not witnessed this process.

**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?**

Comments

**Sea Fisheries**

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

I can only hope that effective communication and consultation is taking place with the island’s fisheries.

**Q13. Are there alternative planning policies that you think should be included in this Chapter?**

Comments

### **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?**

Comments

**Q15. Do you have any comments on Aquaculture, Chapter 7?**

Comments

**Q16. Are there alternative planning policies that you think should be included in this Chapter?**

Comments

### **Wild Salmon and Migratory Fish**

**Q17. Do you have any comments on Wild Salmon and Migratory Fish, Chapter 8?**

Comments

**Q18. Are there alternative planning policies that you think should be included in this Chapter?**

Comments

### **Oil & Gas**

**Q19. Do you have any comments on Oil and Gas, Chapter 9?**

Comments

**Q20. Are there alternative planning policies that you think should be included in this Chapter?**

Comments

### **Carbon Capture & Storage (CCS)**

**Q21. Do you have any comments on Carbon Capture and Storage, Chapter 10?**

Just that I like the idea of it considerably more than wind energy!

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

Comments

### **Offshore Renewable Energy**

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

Comments

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

Your maps are deceptive. The wind farm areas marked off the west coast of Islay are meant to be only 7 miles distant – they look to be much further off.

**Q25. Are there alternative planning policies that you think should be included in this Chapter?**

We have not been consulted about the location of the wind farms, and NOW (since September) we are informed there will be tidal parks as well; IF THEY MUST HAPPEN, why not locate them further to the north west of Islay. In the first place this terrain is uninhabited; in the second place the cables could be taken to Jura, and thence across land to the north end of Jura, where we are reliably told, the cables from the tidal energy project in the Sound of Islay will also be taken. Thus YOU WOULD HAVE AN ALREADY EXISTING CABLE LINE, to which the cables from the north west could be joined.

### **Recreation and Tourism**

**Q26. Do you have any comments on Recreation and Tourism, Chapter 12?**

YES. Islay is designated as unique and valuable environment by a host of conservation bodies e.g. SSSI; Area of Panoramic Quality, Sensitive Coast, Wildlife and Country side Act 1981; Nature Conservation (Scotland) Act 2004; Conservation of Seals Act 1970, European Protected Species – cetaceans, otters and basking sharks; SPA European Bird Directive and

Natura sites and are represented in three/four (?) of the Scottish Government's National Performance Indicators; RSPB bird sanctuary at Ardnave and Sanaigmore. MANY VISITORS COME TO THE ISLAND PRECISELY BECAUSE IT IS ONE OF THE FEW ACCESSIBLE WILDERNESSES left in Scotland, where families can come and enjoy quality leisure time. Moreover, it is one of the most famous of the Scottish islands amongst foreign visitors. I cannot imagine what people would say if they are presented with an 18 mile array of wind turbines just seven miles distant along the popular western coast of Islay. I can tell you that if you lived here, you would not agree at all to their unsightly erection. Can you imagine the disturbance of noise, not only in their construction, but in their continuous maintenance? Only bureaucrats and technocrats sitting at desks who have never been to the islands could possibly have put forward such a plan. The island is also famous for the number of malt whisky distilleries. These attract an ever-increasing number of visitors, besides bringing in a tax revenue to the government, with NO intrinsic benefit to the islanders themselves. (Just see the state of our roads!) The fact that central agencies are prepared to put our island life at jeopardy without any effective consultation makes us very angry!!!!

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

Comments

### **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?**

Comments

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

Map 20. There are no cruise ports marked for Islay. In fact we receive regular visits from cruise ships, including the Hebridean Princess and the Tall Ships cadet training vessel. There are also local operators who run cruises for tourists. Port Ellen and Port Askaig should be marked.

**Q30. Are there alternative planning policies that you think should be included in this Chapter?**

Comments

### **Telecommunication Cables**

**Q31. Do you have any comments on telecommunications, Chapter 14?**

See my previous comment, the route that could be taken through Jura to the north end and join with the cable from the Sound of Islay tidal project.

**Q32. Are there alternative planning policies that you think should be included in this Chapter?**

Comments

### **Defence**

**Q33. Do you have any comments on Defence, Chapter 15?**

Comments

**Q34. Are there alternative planning policies that you think should be included in this Chapter?**

Comments

### **Aggregates**

**Q35. Do you have any comments on Aggregates, Chapter 16?**

Comments

**Q36. Are there alternative planning policies that you think should be included in this Chapter?**

Comments

### **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.**

Comments

### **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 x 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?**

I think only those who are computer literate and can download the pdf version (NOTE THAT THIS IS NOT OBVIOUSLY AVAILABLE) will benefit from the NMP. There needs to be (a) a shorter simpler version made available and probably this should be done at regional level through the Regional Marine Planning agency; (b) as I have repeatedly said, much better and frequent consultation exercises need to take place in the community. Only in this way can you avoid the epithet "discriminatory".

### **Sustainability Appraisal**

**Q40. Do have any views/comments on the Sustainability Appraisal carried out for the NMP?**

Comments