

## CONSULTATION QUESTIONS

Please identify the main area of interest you identify with :

Nature Conservation

Fisheries

Industry/Transport

Energy

Aquaculture

Recreation/tourism

Academic/scientific

Local authority

Community group

Public sector/Regulatory body

Local Coastal Partnership

Other (Please state)

Comments

## **National Marine Plan Consultation Response from the Outer Hebrides Coastal Marine Partnership (Coast Hebrides)**

The Outer Hebrides Coastal Marine Partnership (Coast Hebrides) is a constituted, non-statutory, collaborative grouping of people and organisations with an interest in the coast and has been set up to provide a more holistic approach to addressing coastal sustainability issues through the active involvement of island agencies and interested parties. Through the involvement of a wide range of coastal stakeholders, Coast Hebrides can oversee the development and implementation of a strategy for the coastal zone of the Outer Hebrides. Coast Hebrides is a local coastal partnership which will enable those with an interest in economic development, tourism and recreation, the environment, archaeology, erosion and flooding, to share information, plan, and help to implement the sustainable management of the Outer Hebrides coastal zone.

The response to the consultation on the National Marine Plan has been prepared within the context of the Our Islands – Our Future campaign presently being undertaken by Comhairle nan Eilean Siar, Orkney Island Council and Shetland Island Council.

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

The aim of Coast Hebrides is:

“To promote a sustainable and strategic approach to the planning, management, use and economic development of the Outer Hebrides coastal zone for the benefit and enjoyment of present and future generations.”

.... which in many ways is a concise summary of the NMP's strategic objectives which are derived from marine environment related Scottish Government National Objectives, the Marine Policy Statement and from the EU Marine Strategy Framework Directive.

Sustainability is key to implementation of the NMP's vision for Scotland's marine environment where scope exists for increasing economic activity sensitive to the needs of local coastal communities.

The marine environment of the Outer Hebrides supports livelihoods of many of the local population in proportions far in excess of urban mainland regions and is of prime importance to the economic and resulting social well-being of people living in remote and peripheral communities where sustaining the natural environment is recognised as being highly significant for present and future generations.

The focus of the NMP must be on management of the marine environment towards achieving these factors and should provide strategic direction for preparation and implementation of coastal and marine plans as they impact on local regions. So far as the NMP strategic objectives describe, they seem to be well thought out and do provide clear guidance.

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

As the NMP stands at the moment there is little clear guidance on how terrestrial and marine planning should converge and considerably more work is required for this to be improved. As an example, the Planning Circular mentions the use of “common sense” but this is not planning terminology and is open to misinterpretation.

However, to its credit, the Planning Circular does provide Integrated Coastal Zone Management (ICZM) as a tool which could be used to good effect in resolving differences and at worst conflict between users and activities. Despite development at EU level over a decade and more of ICZM as a coastal and marine planning tool it is largely ignored by the NMP although some of the sector specific policies do allude towards it. More explanation of ICZM is required particularly for the benefit of terrestrial planners and for those future practitioners who will implement the comparatively new discipline of marine (and coastal) planning.

**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?**

Generally, there are gaps in how the NMP describes the implementation of regional marine planning in terms of the make up of Marine Planning Partnerships, what roles will be performed and what remit and responsibilities will be involved. It also omits alternative models for the delivery of regional marine planning and should recognise that ‘one size fits all’ does not reflect the divergence of Scotland’s coastal communities.

The Our Islands – Our Future campaign expresses the wish of the local authorities which administer the Shetlands, Orkneys and Outer Hebrides for transfer of marine planning, marine licensing and marine related revenue generating powers from Marine Scotland and The Crown Estate to the respective islands Councils.

If realised, the targets held by the islands Councils could greatly benefit the economic and social well-being of island populations and satisfy the outcome of local democratic accountability. However, the need for effective representation of those with an interest in protection and enhancement of the local region, recreational use and commercial use is clearly expressed in the Marine Act. The membership of Coast Hebrides is constituted to reflect these interests and the local coastal partnership, or a variation based on it, could make a valuable contribution to the preparation and implementation of regional marine planning in the Outer Hebrides.

The membership of Coast Hebrides could form a Local Advisory Group, a Joint Consultative Group, or have direct input to a local Marine Planning Partnership any of which having recognition in the statutory process.

Coast Hebrides is aware that the issues surrounding Regional Marine Planning will be subject to future consultation and the coastal partnership looks forward to

making a full contribution to the development of marine planning in the Outer Hebrides.

**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?**

The illustrative map which shows proposed boundaries for Scottish Marine Regions has lines which delineate boundaries between the Western Isles, West Highland and Argyll SMRs effectively splitting the Minches. While these boundaries reflect the outcome hoped for through previous consultations (although 12 nm limit instead of the 6 nm option) it is recognised that co-ordination and co-operation will be necessary between respective marine planning authorities in preparation of plans. The SMRs having a 12 nm limit seems to have negated the need to administer areas of seas falling outwith limits, but if thought needed, Coast Hebrides would rather they do not fall between SMR boundaries.

**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?**

Coast Hebrides welcomes the format of the hierarchy laid out for sustainable development in the Plan. Our response to Q1 clearly sets out priorities for the Outer Hebrides in terms of sustainability and the NMP largely reflects these priorities.

**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?**

This is the best approach, however, in relation to climate change, coastal erosion and coastal flooding there should be improved synergy between respective legislation for marine planning, flood risk management and adaptation to climate change.

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

No

## **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?**

The general policies provide high level guidance, however, more explanation of the principles of Integrated Coastal Zone Management would seem appropriate particularly in relation to integration between marine and terrestrial planning. The development of ICZM as a marine and coastal planning tool has a wealth of supporting information and it will be a pity if this resource is not put into practice and ignored.

Although Coast Hebrides will not comment on the consultation on the Planning Circular, it is in need of considerable development if it is to be used by marine and terrestrial planners alike.

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

“Core wild land” should be omitted at this stage in the development of the NMP as the wild land map is subject of another consultation and, in any case, areas identified as wild land will not be formally designated as such.

Otherwise, we agree with the policy.

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

Comments

## **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?**

No

## **Sea Fisheries**

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

No comments

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

No 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?**

No comments

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

No comments

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

No comments

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

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

No comments

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

No comments

### **Oil & Gas**

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

No comments

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

No comments

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

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

No comments

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

No comments

### **Offshore Renewable Energy**

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

No comments

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

No comments

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

No comments

### **Recreation and Tourism**

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

No comments

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

No 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?**

No comments

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

No comments

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

No comments

### **Telecommunication Cables**

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

No comments

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

No comments

### **Defence**

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

No comments

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

No comments

### **Aggregates**

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

No comments

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

No 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.**

No 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  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?**

Comments

### **Sustainability Appraisal**

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

No comments