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

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

Comments Seafood Shetland considers that the draft NMP assists to guide management of Scotland’s marine resources. However, the time period for operation of the Plan should be detailed, together with an indication of the measures which will be created to monitor its effectiveness or otherwise, together with a note of arrangements for review.

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

Comments Seafood Shetland considers that the potential for conflict between local development plans and the NMP might become apparent.

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?
Comments Seafood Shetland considers that further guidance might be necessary in view of the comment highlighted above.

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?

Comments No comment.

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?

Comments Seafood Shetland supports the objectives and policies in the NMP as largely being appropriate to ensure they further the achievement of sustainable development etc.

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?

Comments No comment.

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

Comments No comment.

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?

Comments Seafood Shetland considers that the general policies highlighted are appropriate.
Q9. Is the marine planning policy for landscape and seascape an appropriate approach?

Comments Seafood Shetland considers that this policy is an appropriate approach.

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

Comments No comment.

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 No comment.

Sea Fisheries

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

Comments No comment.

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

Comments No comment.

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 Seafood Shetland considers that the relationship between terrestrial and marine planning for Aquaculture is reasonably well addressed in this chapter. However, there is no reference to the recent Permitted Development Rights for Fish Farms, although it must be said that the existing PDRs are of limited value in light of current industry practices and requirements and should be reviewed as a matter of some importance.
Q15. Do you have any comments on Aquaculture, Chapter 7?

Comments Aquaculture 1 – Seafood Shetland is supportive of this policy; Aquaculture 2 – Seafood Shetland is generally supportive of this policy; Aquaculture 3 – Seafood Shetland considers that the continuing presumption against further developments on the north and east coasts should, perhaps, be reviewed; Aquaculture 4 – No comment; Aquaculture 5 – Whilst supportive of this policy, Seafood Shetland considers that future expansion should not be restricted solely to designated areas and that local knowledge and guidance should be sought where appropriate; Aquaculture 6 – No comment; Aquaculture 7 – No comment; Aquaculture 8 – Seafood Shetland is generally supportive of this policy; Aquaculture 9 – Seafood Shetland supports this policy; Aquaculture 10 – Seafood Shetland supports this policy, in principle; Aquaculture 11 – While this policy is supported in principle, it is believed that at present adhering to current technical standards is not a material planning consideration and addressed by other regulatory mechanisms. Consequently this would mark a new departure and would require further deliberation and consultation; Aquaculture 12 – Seafood Shetland support this policy; Aquaculture 13 – Seafood Shetland supports this policy, in principle, although existing operations must not be compromised when considering proposals for diversification.

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

Comments No comment.

Wild Salmon and Migratory Fish

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

Comments No comment.

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

Comments No comment.

Oil & Gas

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

Comments No comment.
Q20. Are there alternative planning policies that you think should be included in this Chapter?

Comments No comment.

**Carbon Capture & Storage (CCS)**

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

Comments No comment.

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

Comments No comment.

**Offshore Renewable Energy**

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

Comments No comment.

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

Comments Seafood Shetland fears that aspirations for offshore renewable energy might impact upon existing and future shellfish farm operations, already constrained by existing regulatory frameworks. The Scottish Government supports growth of the shellfish aquaculture sector and consequently great care must be taken to ensure that the ambitions for growth are not thwarted by proposals for offshore renewable energy.

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

Comments No comment.

**Recreation and Tourism**

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

Comments No comment.

Q27. Are there alternative planning policies that you think should be included in this Chapter?
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 No comment.

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

Comments At present 43% of freight traffic for the existing northern isles’ ferry operator – Serco NorthLink – is generated by Shetland’s seafood sector. Seafood Shetland considers that this point should be acknowledged in the chapter on Transport. Transport Policy 4 should also include reference to aquaculture.

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

Comments No comment.

Telecommunication Cables

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

Comments No comment.

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

Comments No comment.

Defence

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

Comments No comment.

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

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

Comments No comment.

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

Comments No comment.

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 No comment.

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 you have any views/comments on the Sustainability Appraisal carried out for the NMP?

Comments No comment.