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?

Yes. The NMP is welcomed as a key component in the development of marine planning for Scotland. The integrated approach emphasising the sustainable use and development of marine areas as the basis for the NMP and the associated suite of marine planning documents is supported. The document lays out a clear set of broad objectives to achieve this and recognises the importance of embedding the mitigation of, and adaptation to climate change throughout the Plan.

The detail provided by the sectoral part of the NMP is welcomed. In order to ensure integration hierarchically between the identified sectors and across terrestrial and marine planning systems, Renfrewshire Council would suggest that this is a strong feature in the final NMP.

Q2. Does the NMP appropriately set out the requirement for integration between marine planning and land use planning systems?
The National Marine Plan emphasises the need for integration and it is agreed that this is of key importance to the successful implementation of the marine planning process. The development of the marine planning system is at a much earlier stage of development that the terrestrial planning system, however, Renfrewshire Council would suggest that this could provide an opportunity for the application and sharing of good practice from the land use planning system, where applicable.

Clear integration between the marine and terrestrial systems from the level of the National Planning Framework down to the local level needs to be demonstrated to ensure that the two systems can work successfully together. The NMP does not quite capture this and more detail on how the NMP and NPF will link would be beneficial. It may also be helpful to demonstrate how the two systems will ‘fit’ together through the use of a simple diagram to demonstrate the hierarchy and areas where integration is of particular importance.

To enhance integration, the NMP could benefit from being more specific and provide a greater level as to the process and protocol for engagement between terrestrial and marine authorities; both during the development plan preparation and development management processes.

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?

No Comment

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?

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?

Yes. The general thrust of the objectives should achieve this, however, they are quite broad and we would suggest that they could benefit from being more focussed.
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?

No Comment

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

It would be helpful to know how often it is intended that the NMP will be reviewed and updated. Marine Plans are to be reviewed every 5 years and the associated Strategic and Local Development Plans are also required to be updated on a regular basis, therefore, to ensure the continued relevance of the NMP it should also be updated at regular intervals. The NPF is reviewed every 5 years and it is considered that it might be appropriate for the review regime for the NMP to be of a similar timescale.

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 Main Issues Report for NPF3 identified ‘Areas of Co-ordinated Action’. In order to strengthen the spatial aspect of the NMP, we would suggest that it may be useful to carry out a similar exercise. It may also be possible from this to identify areas of interest that overlap and where there may be potential synergies to be gained when the Regional Marine Plans are in development.

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

Renfrewshire Council recognise that the interface between landscape and seascape is particularly complex and can be a highly dynamic area where man-made and natural processes may result in significant changes to this aspect of marine planning. Therefore the recognition of this special relationship through GEN 14 is welcomed. The need for integration between the two planning systems in relation to this topic is of particular importance within the coastal zone. It is this area that there is likely to be the greatest potential for conflict between uses and it is a very sensitive area where the cumulative impact of developments may also be of greater significance. We would suggest that the approach taken to this aspect of marine planning
policy should highlight these particular sensitivities and offer appropriate protection.

The Firth of Clyde has recently had a Landscape/Seascape Assessment completed which provides an understanding of what is special about the landscape of the Firth of Clyde and the experience of this diverse seascape. It provides a landscape context for decision makers, and suggests opportunities for landscape change. Such studies can provide an objective basis for the development of planning policy and identify areas where there are particular pressures that need to be addressed. Reference to the studies and the benefits that are associated with them should be referred to in the NMP.

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

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?

Details on the various sectors are welcomed. As mentioned in the response to Questions 1 and 8, the focus on the sectoral approach should allow for the integration and consistency between marine and terrestrial planning. Renfrewshire Council considers that there would be significant advantages in ensuring that the NWP still has an appropriate spatial planning basis to its policies. We consider that it is particularly important to secure this at the national level, so that it can be fed through the hierarchy of Regional Marine Plans below.

Sea Fisheries

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

No Comment

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

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?

No Comment

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

No Comment

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

No Comment

Wild Salmon and Migratory Fish

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

No Comment

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

No Comment

Oil & Gas

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

No Comment

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

No Comment

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

No Comment

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

No Comment

Offshore Renewable Energy

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

No Comment

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

No Comment

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

No Comment

Recreation and Tourism

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

No Comment

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

No Comment

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 Comment

Q29. Do you have any comments on Transport, Chapter 13?
Q30. Are there alternative planning policies that you think should be included in this Chapter?

No Comment

Telecommunication Cables

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

No Comment

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

No Comment

Defence

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

No Comment

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

No Comment

Aggregates

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

No Comment

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

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.

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?

No Comment

Sustainability Appraisal

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

No Comment