

## 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 checked="" type="checkbox"/> |
| Energy                        | <input 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 type="checkbox"/>            |
| Public sector/Regulatory body | <input checked="" type="checkbox"/> |
| Local Coastal Partnership     | <input checked="" type="checkbox"/> |

Other (Please state)

Comments

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

Scottish Canals (SC) welcomes the publication of the National Marine Plan (NMP). SC welcomes the sectoral approach outlined in the document but would urge the overall Plan and approach to be cross-sectoral. This should help to ensure a holistic approach to dealing with cross-sectoral marine matters in the NMP and Marine Planning Partnerships (MPP) and Regional Marine Plans (RMP). SC is a recently formed organisation which deals with many cross-sectoral issues including navigation, leisure, water freight, ports and regeneration and we understand the need to work across these sectors. We welcome the opportunity to contribute towards the delivery of the NMP and where relevant RMPs.

Whilst the ambition and intent within the document is strong, it is unclear how the delivery of the NMP will be resourced.

SC welcomes the proposal to establish MPPs and RMPs and would

suggest where relevant (e.g. harbours/ ports within RMP areas, which SC control) that SC should play a role in the planning and management framework. SC operate Bowling Harbour and Grangemouth Sea Lock on the Forth and Clyde Canal, Crinan Harbour and Ardrishaig on the Crinan Canal and Corpach and Muirtown Basin at either end of the Caledonian Canal. All of these locations are key gateways for the marine economy and marine tourism in particular.

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

This is something which Scottish Canals considers to be critically important especially since the canals across Scotland link inland waterways and many rural / urban communities with coastal and marine environments.

SC recently commented on the Draft National Planning Framework and Scottish Planning Policy. We would echo the sentiment made in these responses, which highlighted the importance of integrating marine and land-use planning in and around Scotland and how the canals are key 'integrating' features which already connect inland areas with coastal / marine environments. It would be helpful for the NMP or maps within the NMP to recognise the unique role of Scotland's canals.

It is critical that the relationships between the NMP and the Scottish Planning Policy and National Planning Framework 3 are clear, particularly when the NMP and Draft Circular encourage integration between marine and terrestrial planning. There is scope to reinforce the need for integration between marine and terrestrial planning in the sectoral chapters.

SC is also keen to highlight the need to understand and spatially plan for marine related tourism across Scotland. The relationship between the marine and terrestrial planning frameworks must take this into account given the economic and potential social impact of marine tourism. There should therefore be clear overlaps and synergy between the NMP and the National Tourism Development Plan supported by the NPF3.

**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?**

It is clear from the NMP and the Draft Circular that in terms of hierarchy, the RMPs need to take into account the NMP but there needs to be a way of the regional plans regularly informing national strategy.

**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?**

**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?**

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

### **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?**

engage with stakeholders in bringing forward proposals for change. The Canals are also identified in terrestrial plans across Scotland as environmental corridors which again offer another means of interfacing with the wider marine environment they connect with.

Whilst the Draft Planning Circular provides some useful guidance on the integration of terrestrial and marine planning, further guidance would be helpful in due course particularly as there are currently many more 'land-use' planners in Scotland than there are 'marine' based planners. SC has also made a separate response to the Draft Planning Circular.

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

Comments

**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?**

Comments

### **Sea Fisheries**

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

Comments

**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?**

Comments

**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?**

Comments

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

Comments

### **Recreation and Tourism**

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

Scottish Canals would wish to reiterate the spirit of our response to the NPF3 i.e. the importance of integrating terrestrial and land-based planning and in particular for both to take account of the spatial importance of tourism. We would also wish to underline the importance of the National Tourism Development Framework which should inform future terrestrial and marine based plans.

SC has a crucial role to play in supporting important 'sailing' areas recognised within this Chapter (e.g. Firth of Clyde / Western Isles) since the canals act as a means of connecting the East Coast and inland boating with these sailing grounds. The canals and their 'international' gateway ports / harbours are pivotal in terms of connecting and developing coastal and maritime routes to help grow the marine tourism sector. There is scope for overlap and consistency between the Firth of Clyde Marine Region area and the Firth of Clyde Area of Coordinated Action which is highlighted in the draft NPF3.

SC highlighted in response to the NPF3 that the west coast / isles sailing grounds could be recognised as a national tourism priority given the quality of the sailing in this area. It is important that significant investment and joined up working is undertaken by land and marine based agencies to bring the quality of marine tourism infrastructure up to the standard of the

sailing grounds they are meant to serve. The NMP and RMPs will have a role to play in helping to deliver significant improvements and a much better tourism and leisure offer to the many coastal villages and ports around the west coast.

SC is a member of the Scottish Government's Cross Party Group on Marine Leisure & Tourism. SC is also a member of the Firth of Clyde Forum (which has provided separate comments in respect of that area of interest). SC also works with organisations such as the RYAS to promote sailing and marine tourism and we therefore have a contribution to play in support of marine recreation and tourism.

SC (along with Sustrans and SNH) was recently asked to form a sub-group focused on long-distance routes to help inform the preparation of the NPF3. This group has produced a paper for the Scottish Govt NPF3 team which highlights the opportunity to create a network of long-distance walking and cycling routes, which include the canals as key priority routes and highlight connections to coastal areas / routes. SC would urge the NMP and RMPs to take account of these priority long-distance routes and to extend these routes into marine areas where appropriate.

The Long-Distance Routes group recognised the need for long-distance terrestrial routes to integrate with marine tourism networks such as sailing routes and coastal / island canoe trails and for this network to be recognised within the national planning framework. This could be a key area and spatial priority for the NMP to focus on and also demonstrate some consistency and integration with NPF3 and the National Tourism Development Plan.

The policies are designed to address both marine tourism and marine recreation however the discussion within the chapter refers to marine recreation without reference to marine tourism at some points. It is important that both these aspects are clearly referenced throughout the NMP.

**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?**

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

Scottish Canals has statutory undertakings and permitted development rights with regards to ports and harbours and the canals generally. SC operates and manages 6 coastal ports including Bowling Harbour and Grangemouth Sea Lock of the Forth & Clyde Canal, Corpach and Muirtown Basin / Seaport Marina on the Caledonian Canal and Crinan Harbour and Ardrishaig on the Crinan Canal.

SC welcomes the objective within this chapter of maximising the tourism potential of ports and harbours. SC's ports / harbours have undergone recent investment but require significant additional funding to make them even more attractive gateways and tourism destinations. It is critical that within this context and often the need to spend money wisely and timeously that SC continues to undertake certain 'operational' improvements under our statutory undertakings wherever appropriate. SC also supports Policy Transport 4 which underlines the importance of maintaining, repairing and improving ports / harbours to support marine recreational and tourism activities.

The NMP should recognise the importance of these 'international' gateway locations and support their development as leisure, commercial and tourism hubs which interface with Scotland's wider marine environment.

At Grangemouth, SC is part of the Helix Project which includes the Kelpie's – two 30m high sculptural tourism attractions which celebrate this gateway. At Bowling we are currently investing around £1m Scottish Govt Shovel Ready monies in the refurbishment of disused railway arches as part of a wider regeneration programme worth circa £25m which could through time lead to a significant marina opportunity on the Upper Clyde.

At Ardrishaig on the Crinan Canal SC operate a major timber wharf operation which has helped remove 1.2m tonnes of freight from Scotland's roads since 2010. There is also an opportunity to create a coastal marina at Ardrishaig to significantly enhance 'land-based' regeneration efforts whilst at Crinan Harbour at the other end of the Crinan Canal, we have a gateway into some of the best sailing grounds and important marine ecological areas in Europe.

Corpach is the western terminus of the Caledonian Canal which links Scotland's east and west coasts, avoiding difficult passage around the north of mainland Scotland and through the Pentland Firth. This gateway provides access to some of the best sailing grounds in Europe if not the world. Muirtown Basin is on the eastern terminus of the Caledonian and is a major international gateway for boaters arriving from Europe, particularly Scandinavia, and for fishing vessels making transit journeys through the canal.

SC is preparing significant regeneration proposals for Bowling and Muirtown

Basin areas in partnership with local organisations. These plans could inform any future marine plans for the surrounding areas.

In terms of the overall freight opportunity on the canals, in addition to the Ardrishaig operation, we believe that the Caledonian Canal could become more of a conduit for freight e.g. timber or aggregates removed through quarrying or Highland hydro schemes. For example if there is surplus material requiring to be removed from the Caledonian Canal it could be transported to locations such as Bowling to eventually rebuild the former outer Harbour wall to create a new marina. Projects like this require cross-sectoral thinking and partnerships and would benefit from being supported in both terrestrial and marine planning terms.

Bearing in mind the significance of the above and the potential contribution the canals and their ports / harbours make to the marine tourism network, we feel that the canals should be recognised within the NMP and certainly within relevant RMPs.

**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?**

Comments

**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 include 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  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?**

Comments