

National Marine Plan 2 Strategic Environmental Assessment (SEA) Scoping Report: Consultation Analysis

August 2024

National Marine Plan 2 Strategic Environmental Assessment (SEA) Scoping Report: Consultation Analysis

Contents

1. Background.....	2
2. Assessments	2
3. Consultation.....	3
3.1 Purpose	3
3.2 Process	3
4. Analysis.....	4
4.1 Overarching themes identified from feedback on SEA Scoping Report.....	4
4.2 Overarching themes identified from feedback on NMP2.....	5
4.3 Analysis by question	5

1. Background

Not only in Scotland, but globally, the decisions that govern our oceans are vital to the future of our planet. Our National Marine Plan provides the planning framework for the strategic management of our seas and supports sustainable development.

Since its adoption in 2015, the current National Marine Plan has undergone two statutory reviews in 2018 and 2021. The 2021 statutory review concluded that whilst the plan remained effective there is an urgent need to update the plan to better reflect emerging matters including tackling the twin crises of climate change and biodiversity loss, and support for the transition to net zero.

The decision to update and replace the existing National Marine Plan was formally announced by Ministers in Parliament in October 2022 and in the [Programme for Government 2022-23](#) and re-affirmed in the First Minister's Policy Prospectus in April 2023

The development of a new National Marine Plan 2 (NMP2) is underway. We are adopting a Blue Economy approach to the plan. This will help get the right framework in place to address the increasing competition for marine space and resources, acknowledging the variety of demands and needs for, and from, the marine environment whilst continuing to support licencing and consenting decisions.

2. Assessments

Under the Marine and Coastal Access Act 2009 a sustainability appraisal is required to assess the potential impacts from the proposed policies in NMP2, on marine sectors, communities and the marine environment.

As part of the sustainability appraisal a Strategic Environmental Assessment (SEA) will be conducted alongside the development of the NMP2. This process is designed to determine the likely impacts of the policies on the environment and allow for subsequent adjustment to policies, in the plan, where required, to minimise the identified impacts.

The first stage in the SEA was a scoping exercise culminating in the production of a [scoping report](#), published 25 September 2023.

This scoping report sets out the remit of the SEA and the level of detail to be covered in the assessment. The SEA scoping report outlines the:

- policy context
- environmental baseline
- proposed methodology for assessment

The scoping report was developed with input from key stakeholders.

Initial review, considering a precautionary approach, suggests that all SEA environmental topics are to be scoped into the assessment due to the nature and scale of NMP2 and the potential for likely significant effects to occur across all topics.

Therefore, the SEA is proposed to consider:

- biodiversity, flora and fauna
- population and human health
- soil (including marine geology, sediments, and coastal processes)
- water
- air
- climatic factors
- material assets
- cultural heritage
- landscape and seascape
- inter-relationships between them

3. Consultation

3.1 Purpose

From 25 September 2023 until 30 October 2023 the Scottish Government Marine Directorate held a public consultation alongside the statutory consultation on the proposed scope of the SEA for the NMP2.

The consultation was an opportunity to implement our [vision for engaging stakeholders during the development of NMP2](#):

"Everyone who uses, relies on or has an interest in Scotland's seas has the opportunity to inform decision-making in the marine space, and they embrace the National Marine Plan as a key resource to guide decision-making"

Feedback provided from this consultation will feed into the SEA process and help inform the scope of the environmental assessment.

3.2 Process

The consultation was hosted on the Scottish Government's Citizen Space portal and consisted of six open-format questions with free-text fields, responses provided via email or post were also accepted. In total, 42 responses to the consultation were received from one individual and 41 organisations. Three organisations opted to send email submissions, which were then manually entered into Citizen Space to allow for analysis.

All responses were read in full by the NMP2 team, with thematic analysis of each response being conducted to capture the main opinions expressed by respondents and to explore overarching feedback. All comments submitted have been logged. Where duplicate responses have been submitted, such as through the [Strategic Environmental Assessment \(SEA\) Gateway](#), and Citizen Space, we have cross-referenced and amalgamated into one response.

Those comments relating to the SEA will be anonymised and then shared with the contractor undertaking the assessment. These will be used to inform the assessment

methodology which will be shared with the NMP2 Steering Group for review. The NMP2 Steering Group includes over 30 member organisations across a wide range of sectoral interests, within the Scottish marine space.

The Socio-Economic Impact Assessment (SEIA), which also forms part of the Sustainability Appraisal, will focus on the potential impacts from the planning policies in NMP2 on marine sectors. Comments received which relate to the data or approach to be used in considering the impact on marine sectors will be anonymised and shared with the contractor undertaking the SEIA for review. Any comments and suggestions on the plan itself received, have been separated and will be used by the NMP2 team as part of the feedback considered in the NMP2 development.

4. Analysis

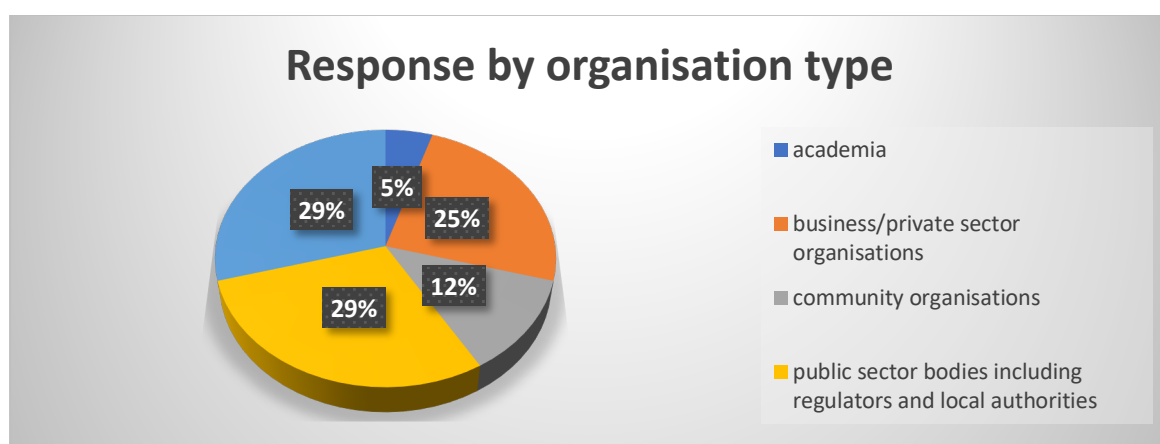
Responses were analysed to identify prevalent theme and subtheme, arising within the comment.

Responses received from organisations were split according to type. A break-down is shown below:

- academia (2)
- business/private sector organisations (10)
- community organisations (5)
- public sector bodies including regulators and local authorities (12)
- representative bodies and charities (12)

Most responses in the businesses/private sector category were from organisations with their main interest in the renewables sector.

Respondents did not always respond to all six questions in the consultation.



4.1 Overarching themes identified from feedback on SEA Scoping Report

The [Scoping Report](#) suggested that due to the nature and scale of NMP2 and the potential for likely significant effects to occur across all topics that all SEA environmental topics be scoped into the assessment.

Around half of respondents agreed to scoping in all environmental topics from the SEA legislation, with many suggesting specific environmental components for consideration, such as: the interaction between sectors, consideration of entire ecosystems, and sustainable access to marine areas. Useful feedback on the SEA objectives used in the assessment of the 2015 National Marine Plan was provided. The need for greater emphasis on the global climate emergency and support for the transition to net zero was highlighted, and it was clear that respondents wanted to see greater emphasis on halting loss and proactively recovering biodiversity in the marine environment.

Respondents were supportive of the proposed approach to the SEA and the identification of key environmental issues under each topic to be used in the assessment and to inform the SEA objectives.

However, several respondents felt that commentary on the SEA framework was challenging because the updated SEA objectives for the NMP2 were not available in the scoping report. Furthermore, there should be clearer consideration of the relationship between topic areas, and how effects in one topic could have implications in another. A common theme presented during the analysis was the need for interactions between marine users, specifically between sectors, to be considered.

Responses from the consultation, and updated list of environmental issues, will be used to inform the SEA objectives for the NMP2. These objectives will be shared for review with the NMP2 steering group before the assessment begins. The intent for the SEA process to work in parallel with the NMP2 development was welcomed by Consultation Authorities.

4.2 Overarching themes identified from feedback on NMP2

A number of common points on proposals for the new NMP2 itself were observed during the analysis:

- Respondents expressed a desire for NMP2 to be used as the clear framework for decision-making when considering colocation and capacity for multi-use areas.
- NMP2 needs to be ambitious and have an important role in setting priorities where there is the potential for competing priorities.
- Prioritisation of key topics within the marine environment would help in delivering strategic aims of the Scottish Government.
- NMP2 should be used as an opportunity to provide guidance on spatial policies that are likely to be needed at the local, regional, and national level.
- NMP2 should help ensure increased synergy between marine and terrestrial planning to ensure consistency between policy frameworks.

4.3 Analysis by question

Question one asked: *“Do you have any comments on either the environmental topic areas or assessment methodology proposed?”*

Seventeen responses from a range of private and public sector organisations showed clear favour for the inclusion of all proposed topic areas, with some responses providing additional issues to further strengthen the topic areas, for example “the consideration of interactions between multiple issues and addressing cumulative effects, particularly where issues impact on whole ecosystems such as climate change. These have been noted and will be shared with the contractors.

The remaining respondents did not object to the environmental topic areas, but rather some thought they could be updated to better reflect the role that oceans can play in delivering climate change mitigation and biodiversity recovery. Eight respondents agreed that the methodology to be used was appropriate. Three respondents, ranging through Academia and Representative Bodies and Charities, were not in favour of the methodology, all highlighting suggested issues for inclusion within the topics or requesting greater clarity on the process. While the remainder of responses were neutral or left blank.

Question two asked “*What are your views on the broad policy framework and is there any further information that you feel should be considered?*”

Nineteen respondents agreed with the proposed SEA framework, with suggestions proposed for ensuring a strong alignment between NPF4 (National Planning Framework 4) and NMP2 in cross-cutting policy areas and recommendations to include the Nature Conservation (Scotland) Act 2004 and fisheries management measures.

The remaining respondents did not explicitly object to the SEA framework but rather had suggestions for further policies and considerations to be taken into account. All the proposals for the assessment will be considered and, where appropriate, shared with the contractor undertaking the SEA. The proposed SEA assessment methodology will be shared with the NMP2 steering group for review.

Question three asked “*Is there any further information or data that you feel should be considered as part of the environmental evidence base for the assessment?*”

As set out in the Scoping Report, [Scotland's Marine Assessment 2020](#) (SMA2020) will provide the broad evidence base for SEA by providing an information on the state of Scotland’s seas and of the main activities and pressures. As also highlighted in the scoping report, where required, additional and updated data and information will be taken into account and used as part of the environmental baseline.

While many respondents agreed to the SMA2020 being used as the primary evidence base, six disagreed and over three quarters of respondents provided suggestions for additional evidence. These have been collated and, will be considered by the contractor undertaking the SEA. The NMP2 steering group has been asked to provide any additional sources of evidence for inclusion in the assessments.

Question four asked: *“What are your views on the early work set out in the report to identify key environmental issues that will be used to inform the development of SEA Objectives for assessment (SEA Objectives - Section 3, Table 1)?”*

There were 41 responses to this part consultation, with around half of respondents agreeing that the environment issues identified should be used to inform the SEA objectives. A number of suggestions were made for inclusion, such as “adopting an ecosystem-level assessment of species and habitats and their interactions” and highlighting the “need for a spatial management approach in the NMP2, and assessment on an area basis”. These have been noted and will be shared with the contractors.

Question five asked: *“What are your views on the SEA Objectives used to assess National Marine Plan (2015), (SEA Objectives – Section 3, Table 2)?”*

There were 39 responses to this part of the consultation. While several respondents considered the SEA objectives used to assess the current National Marine Plan published in 2015 to be minimal, many were supportive of them being used as a starting point to develop updated SEA objectives for assessment of NMP2 and welcomed that they would be updated and modified in accordance with feedback from this consultation. The SEA objectives to assess the potential environmental impacts from the proposals in NMP2 will be shared with the NMP2 steering group for review before the assessment begins.

Question six was an open question asking: *“Do you have any further comments on the SEA scoping report?”* giving responders the opportunity to provide any relevant comments about the SEA scoping report in general.

There were 37 responses to this part of the consultation. Responses were wide-ranging, many focusing on proposals for the plan and will be useful as we take the next steps in the NMP2 process. We have collated all responses and will share with the contractors, for consideration. Please refer to Section 4.2 ‘Overarching themes from the feedback on NMP2’.



© Crown copyright 2024



This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit nationalarchives.gov.uk/doc/open-government-licence/version/3 or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: psi@nationalarchives.gsi.gov.uk.

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at www.gov.scot

Any enquiries regarding this publication should be sent to us at

The Scottish Government
St Andrew's House
Edinburgh
EH1 3DG

ISBN: 978-1-83601-640-3 (web only)

Published by The Scottish Government, August 2024

Produced for The Scottish Government by APS Group Scotland, 21 Tennant Street, Edinburgh EH6 5NA
PPDAS1489938 (08/24)

W W W . g o v . s c o t