

Appendix 1: National Marine Plan Proposed Response

Pre-Consultation Draft



RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

1. Name/Organisation

Organisation Name

Aberdeen City & Shire Strategic Development Planning Authority (SDPA)

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3. Permissions - I am responding as...

Individual

/

Group/Organisation

Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate Yes No

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick as appropriate Yes No

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate Yes No

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)

Q1. Do you have any comments on Sections 1 - 6?

Para. 3.3 states the requirement for land planning authorities to give consideration to Marine Plans. Whilst this is accepted, para. 3(2) of Schedule 1 to the Marine (Scotland) Act 2010 also makes it clear that all reasonable steps must be taken to secure that any regional marine plan is compatible with the development plan (SDP and / or LDP) for any area that adjoins it. It should also be noted that the legislation referred to has already come into force through the Town & Country Planning (Miscellaneous Amendments) (Scotland) Regulations 2011. Regulation 5 being the relevant part; which the SDPA supported during the consultation.

Achieving this alignment will require early discussions between Marine Planning Partnerships and planning authorities to explore the nature of the relationship and the potential issues that exist. With a legal requirement on both parties, appropriate mechanisms must be developed to achieve these shared objectives. It should also be noted that the relationship between the national marine plan and national planning framework will be key to effective implementation.

Para. 5.1 contains a reference to the 'Marine Atlas: Information for the National Marine Plan'. The atlas provides a useful spatial element that is currently missing from the plan itself, making it difficult to understand the key sectors and interactions involved in any one area. Once boundaries are confirmed for the marine regions, the information from the atlas and other spatial, map-based information should be presented in the national plan to allow stakeholders to better understand and engage with the document. The current policy / thematic approach is very informative, but lacks place specificity that would be expected from any land use plan.

Para. 6.7 refers to Marine Strategies developed under the Marine Strategy Framework Directive. However, it is not clear what the relationship is between these strategies and the national or regional marine plans, or whether indeed they are the same thing.

Q2. Do you have any comments on Section 7 - National Marine Plan – Key Objectives?

The inclusion of Scottish Government strategic objectives, purpose targets, national objectives, high level marine objectives (HLMO) and good environmental status (GES) indicators makes for a confusing hierarchy. This is not helped by the dispersal of HLMO and GES indicators through the four headings (are these national objectives?) and this section could benefit from clarity on any priorities that exist, i.e. are HLMO1-4 dealing with businesses operating in the marine environment, given greater weight than HLMO21 dealing with evidence and monitoring?

Q3. Do you have any comments on Section 8 - Climate Change Objectives?

This section should recognise that the marine environment is not only adapting to the effects of climate change, but that it has a significant role to play in mitigation through its ability to accommodate the infrastructure needed to deliver many renewable initiatives, both directly (such as offshore wind turbines) and indirectly (such as electricity grid enhancements).

Q4. Do you have any comments on Section 9 - Scottish Government approach to development in the Marine Area?

This section begins to provide some policy themes that will allow decision makers to consider proposals. However, the boxed text is not branded as policy, so it is unclear what status it has, or how regional marine plans will be expected to use it. As high level statements, these provide some strategic direction and are positively phrased, which is helpful if there is a presumption in favour of development.

Box 2 refers to "national priorities", but it is unclear where these are defined – are these the same as national objectives in section 7? Clarity is required on this point.

Q5. Do you have any comments on Section 10 - Interactions Matrix?

The matrix provides a useful snapshot of the range of interactions. However, it appears to have some inconsistencies within it and its usefulness is limited as it provides no indication of potential impacts (with or without interventions).

Q6. Do you have any comments on Chapter 1 FOOD - Introduction?

None.

Q7. Do you have any comments on Chapter 1 FOOD – Fisheries?

It would be worth recognising in this section that many fishing communities are in peripheral locations and some have suffered as a result of recent decommissioning of vessels and reductions in quotas. These fragile economies often rely heavily on fishing and processing industries and support significant proportions of the working population. The direct and indirect economic and social impact of any further contraction in the fishing industry is likely to conflict with the goal of sustainable economic growth and efforts at sustaining and regenerating these communities, unless appropriate mitigation is provided.

Q8. Do you have any comments on Chapter 1 FOOD – Wild salmon & Freshwater Fisheries?

None.

Q9. Do you have any comments on Chapter 1 FOOD – Aquaculture?

None.

Q10. Do you have any comments on Chapter 2 ENERGY - Introduction?

None.

Q11. Do you have any comments on Chapter 2 ENERGY – Oil & Gas?

This section provides a good summary of the situation, although it does considerably underplay the significance of the sector's contribution to the local, regional and national economy.

Q12. Do you have any comments on Chapter 2 ENERGY – Carbon Capture & Storage?

The potential for CCS at Longannet is well documented; however, the proposal at Peterhead has also been put forward by the UK Government for NER300 funding from the EU. North east Scotland is well placed and could also make a contribution based on existing infrastructure and expertise as well as links to other major initiatives, such as Energetica.

Q13. Do you have any comments on Chapter 2 ENERGY – Renewables?

The offshore renewables industry is comprehensively covered in this section and N-RIP also features. Once again, this coverage could be enhanced by mapping key locations. The linkages between on and offshore planning could also be enhanced and reference to NPF2 proposals such as the upgrade of Peterhead Power Station and east coast grid reinforcements made.

Consideration should be given to the identification of nationally important projects, which should be reflected in regional marine plans, mirroring the role played by NPF2. These could include N-RIP sites, carbon capture and storage and offshore grid developments for example. The relationship between the national marine plan and national planning framework will be key to ensuring a consistent approach at the national level and ease implementation at the regional / local level.

Q14. Do you have any comments on Chapter 3 TOURISM & RECREATION?

This section should make more reference to the value of the existing coastal path network and support its growth over the short – medium term.

Q15. Do you have any comments on Chapter 4 MARINE TRANSPORT?

The protection of existing shipping lanes and presumption that there will be no development in key navigational areas (including ferry routes) is to be supported. However, this must not preclude development such as laying cables, pipelines and other projects that will have minimal or no impact once installed.

Q16. Do you have any comments on Chapter 5 TELECOMS & CABLES?

As with offshore renewables, there should be a recognition of any onshore requirement needed to support the delivery of new telecom and cable networks.

Q17. Do you have any comments on Chapter 6 MILITARY ACTIVITIES?

None.

Q18. Do you have any comments on Chapter 7 MARINE ENVIRONMENT?

We would support the designation of environmental designations in the marine environment and the Directive to achieve good environmental status. These require the same level of support and protection as terrestrial initiatives and designations.

Q19. Do you have any comments on Chapter 8 COASTAL/WATER – Coastal Protection & Flood Defence?

None.

Q20. Do you have any comments on Chapter 8 COASTAL/WATER – Water Abstraction?

As the population of Scotland continues to grow, the climate changes and river basin management planning may limit abstraction to protect species and habitats, there needs to be a recognition that new sources may need to be identified and / or new technology employed to ensure continuity of supply in the longer term.

Q21. Do you have any comments on Chapter 8 COASTAL/WATER – Waste Water?

None.

Q22. Do you have any comments on Chapter 9 AGGREGATES & DISPOSAL?

None.

Q23. 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

Q24. If you answered yes to question 23 in what way do you believe that the creation of a Scottish National Marine Plan is discriminatory?

N/A