

## Scottish Wildlife Trust Consultation Response



### Draft Planning Circular

The relationship between the statutory land use planning system and marine planning and licensing  
November 2013

#### 1. Is the Draft Circular on the relationship between the land use and marine planning systems helpful?

The draft circular outlines the legal framework for the marine environment in what will prove to be a helpful document for terrestrial planners, but we are not convinced it provides the necessary guidance to allow terrestrial and marine plans to operate in an integrated way to help achieve sustainable development.

In order for marine planning to function well the relationship between national/regional marine plans and all other marine and coastal planning tools need to be clear from the outset. We do not believe this circular sets out that relationship sufficiently. For example, there is no mention of the River Basin Management Planning.

While the legal framework is covered in some detail, improved understanding of the relationships at play could come from a schematic, indicating the National Marine Plan, Scottish Planning Policy and National Planning Framework, their respective hierarchies and the areas where they interact. For example, the Defra strategy for promoting an integrated approach to the management of coastal areas displays the linkages that exist in England on page 26 of the document available at:

<http://archive.defra.gov.uk/environment/marine/documents/protected/iczm/iczm-strategy-england.pdf>

The circular should acknowledge the duty on Scottish Ministers under the Marine (Scotland) Act to further the achievement of sustainable development.

The final circular should include a map of the Scottish Marine Regions once adopted.

#### Q2. Does the Draft National Marine Plan appropriately set out the requirement for integration between marine planning and land use planning systems?

No. In many respects the draft circular is uni-directional, in that it outlines the role of marine planning but doesn't set out how Scottish Planning Policy and the National Planning Framework interacts with management of the marine area; both strategic documents have implications for marine planners.

**Q3. Do you agree with the suggestions for good practice in paragraphs 30-39, and do you have any other suggestions?**

The suggestions currently sit embedded in the section titled marine planning. It would be useful for these to sit within an "integration" section, where an overview on the need for integration is provided, followed by recommendations for best practice.

The suggestions currently listed are useful but we would like to see the circular outline specific recommended mechanisms for integrating marine and terrestrial planning processes to ensure consistent and mutually supportive planning regimes. At present we are concerned that the suggestions are too vague to achieve this in practice.

There is also a need to consider cross-border co-ordination especially with regard to the Solway Firth, where two different marine planning regimes will apply in a single ecological unit.