



Written evidence

Regional Marine Planning

Scottish Wildlife Trust

11 July 2019

The Trust considers it essential that adequate resources are provided to support the development of Regional Marine Plans and that a timeframe is established for advancing their implementation.

The Scottish Wildlife Trust welcomes the opportunity to provide written evidence to the ECCLR Committee on the current status of regional marine planning in Scotland. Through its Living Seas programme, the Trust has regularly engaged with the development of marine planning in Scotland, for both the National Marine Plan and the Regional Marine Plans. The Trust considers that effective marine spatial planning will play a significant role in how we use and manage the marine environment, and all activities within it, and believes that the implementation of Regional Marine Plans will be an important step in addressing many of the management challenges facing Scotland's inshore waters.

The Trust would like to highlight that we also support the written evidence submitted by Scottish Environment LINK.

Key Points

- The Trust believes that Regional Marine Plans (RMPs) have the potential to significantly advance the management of Scotland's inshore marine environment through spatial planning and go beyond the high-level policies within the National Marine Plan.
- The Trust believes that RMPs can provide the required framework for implementing an Ecosystems Approach to managing marine activities and the environment within Scotland's inshore waters.
- The Trust considers a key benefit of RMPs is that they can be tailor-made and adapted to meet the needs of the area they cover and allow for local knowledge and expertise to be integrated in management decisions.
- At present, the Trust considers that there is a lack of marine planning expertise within Local Authorities and that this could be a significant hinderance to the future development and implementation of RMPs across Scotland.
- The Trust considers that there is currently a lack of financial and political support for the timely development and implementation of RMPs.

Q. Are the objectives for the establishment of the Scottish Marine Regions still appropriate?

The Scottish Wildlife Trust considers that the establishment of Scottish Marine Regions is still appropriate. The Trust believes that the delegation of marine planning and objective setting to a region level is essential for going beyond the high-level policies identified within the National Marine Plan and developing an efficient and effective marine planning system.

The Trust considers that the recent IPBES and UK Marine Strategy Assessment reports, which both indicate the denuded and poor state of the marine environment, highlight a need to reconsider how we manage our seas and, in particular, the impact marine activities have on the environment.

The decentralisation of marine planning powers will improve the management of the marine environment, as local knowledge and expertise that may not be captured at a national scale can be incorporated into the planning process. The decentralisation of marine management is a key component of the Ecosystem Approach – a spatial management approach that considers all activities within a specified area, their impacts on each other, and their individual and cumulative impact on the environment. With regards to Regional Marine Plans (RMPs), the application of the Ecosystem Approach would require decision makers to consider: the spatial management of all marine activities (current and potential) within the region, the current status of the marine environment, the

conservation objectives of the region, and the individual and cumulative pressure marine activities place on the environment.

The implementation of the Ecosystem Approach would be a significant step away from the current management approach, which tends to consider activities and impacts in isolation. The Trust considers that a natural capital approach to marine planning, which considers the state of marine natural capital assets, e.g. fish stocks and habitats, and the ecosystem services they provide, could assist the implementation of the Ecosystem Approach.

The Trust believes that one of the key benefits to developing marine plans at a regional level, is the ability to identify and implement planning objectives that are specific to that region. Scotland's marine environment hosts an array of different marine industries, activities and wildlife that are different within each region. Therefore, neither a single high-level approach (i.e. the National Marine Plan) nor a one-size-fits-all approach would adequately capture the requirements of each specific region.

The Trust believes that RMPs present a significant opportunity to ensure Scotland's marine planning system is fit-for-purpose and provides the required mechanism for implementing an Ecosystem Approach and addressing the many pressures placed on the marine environment.

Q. What progress has been made in the development and implementation of Regional Marine Plans and what are the objectives and priorities for the next 5-10 years?

The Trust considers that progress towards developing and implementing RMPs has been slow and that currently there is inadequate financial and political support for their development and implementation. The Trust considers it essential that adequate resources are provided to support the development of RMPs and that a timeframe is established for advancing their implementation. Over the next 5-10 years, the Trust considers that concerted efforts should be made to establish Marine Planning Partnerships for all marine regions and advance the development and implementation of the remaining RMPs.

The Trust considers it vital that efforts are made to review the resources currently available, and those required, to support and advance the development of all RMPs. In addition, regions with insufficient environmental data to perform a robust Regional Environmental Assessment must be identified and knowledge and expertise gaps should be filled to avoid further delay in the development of RMPs.

The Trust believes it is important to consider the work being carried out by different organisations, industries and research facilities that could contribute to and support the development of RMPs. For example, the Trust is about to begin a new project, titled 'Oceans of Value', which aims to investigate two different approaches for valuing the marine environment – stakeholder valuation and natural capital valuation. This project aims to carry out an extensive community engagement project and a detailed assessment of marine natural capital assets, and the ecosystem services they provide, within the Orkney Marine Region. It is hoped that the findings of the Oceans of Value project could contribute directly to the development the Orkney RMP and indirectly to the remaining RMPs.

Q. What is required to deliver an effective Marine Planning system under Part 3 of the Marine (Scotland) Act 2010? Is the National Marine Plan capable of delivering sustainable development within Scottish Marine Regions in advance of those areas having an RMP in place?

As previously mentioned, management plans developed at a regional level, rather than a national level, are better placed to make decisions that reflect the needs of that region. For example, the National Marine Plan (NMP) contains growth objectives for the salmon aquaculture industry, which are not relevant for the North Coast, Moray Firth, North East, and Forth and Tay regions as salmon aquaculture is not permitted in these regions. However, the further growth of the offshore renewables would be relevant, as the east coast of Scotland has been identified as a key area for wind farm development. Due to the variation in characteristics and requirements of each of the Marine Regions, the Trust does not believe that the NMP provides the required level of detail to deliver sustainable development at a regional level.

The Trust believes that each marine region must be provided with the required financial, political, and technical support to establish Marine Planning Partnerships and develop RMPs. It is important to recognise that once the RMP has been implemented, marine planning expertise will still be required to ensure future planning decisions meet the objectives of the RMP and to review the RMP every five years. Therefore, any decisions made on the provision of resources to support RMPs must consider the long-term marine planning requirements of each region in addition to the more immediate needs for developing the RMP.

Although RMPs will be tailored to each of the Marine Regions, the Trust considers it essential that MPPs are in regular communication with each other during the development of RMPs to ensure that those sharing a boundary are compatible and work collaboratively. There is a risk of development in one region impacting the environment in another, or the cumulative impact of developments in multiple regions not being fully realised and accounted for when making decisions at a regional level.

Q. What duties/requirements are there on local authorities to develop and implement RMPs?

Local Authorities (LAs) are required to have a role within Marine Planning Partnerships and contribute towards the development of the RMP. In some regions this could be a single LA, such as Shetland and Orkney, but in other regions like the Clyde and Forth and Tay this could involve multiple LAs.

In the case of the Orkney RMP, which is currently in the early stages of development, the lack of a suitable organisation to establish and head the MPP resulted in Orkney Islands Council taking the lead role, which was made possible by a late amendment to the Islands (Scotland) Bill. It is possible that LAs in other Marine Regions with only one or two LAs will be required to fulfil the same role. Therefore, it is essential that these LAs are identified and provided the required support and training to increase their capacity to develop and deliver an RMP.

The Trust believes it is also important to recognise that Highland Council would be required to play a role in four MPPs (Argyll, West Highlands, North Coast and Moray Firth), and that for two of these (West Highland and North Coast) Highland Council would be the only LA. This could present a considerable challenge for marine planners within Highland Council.

Q. Is there sufficient marine planning expertise in all Local Authorities for development of RMPs?

It is the Trust's view that marine planning expertise is highly variable amongst LAs and that there is currently a general lack of marine planning expertise within LAs across Scotland to deliver all 11 RMPs. The Trust considers it important to recognise that marine planning is a relatively new discipline and that LAs have more capacity and expertise with terrestrial planning. However, the marine and terrestrial environments are very different and require different skills, knowledge and expertise. The Trust considers that, for RMPs to be effective in achieving their objectives, it is essential that resources are made available to increase the marine planning capacity of LAs most likely to be involved with MPPs and developing RMPs.

The Trust believes it is important to recognise the wealth of marine planning expertise that currently exists in Scotland within various academic, NGO and industry bodies and that further discussion is needed on whether there are opportunities to better integrate this expertise into the planning departments of LAs and the development process of RMPs.