

Consultation response

Response to National Marine Plan 2 Planning Position Statement



06 February 2025

High Level Objectives

1. Do you agree with the updated wording for the high-level objectives (HLOs) and the focus they set out for policies in the National Marine Plan 2 (NMP2)?

Yes

No

Please state which high-level objectives (HLOs) you are referring to in your response:

Please see answer to question 2

2. Please add any additional comments on the high-level objectives (HLOs) in the space provided below.

The Trust broadly agrees with reducing the number of HLOs to reduce duplication across other strategies and plans, better align with policy priorities and ease implementation.

We strongly agree with the key feedback from stakeholders that the HLOs should include clearer, stronger and more active wording to ensure that there are very clear guidelines for marine decision making that will actively address the issues the marine environment is facing.

However, there is the potential for oversimplification. We should be aiming to strengthen the objectives already adopted in the current National Marine Plan, ensuring that the overall aims are not watered down.

Given the importance of community involvement in the implementation of policy it is perhaps remiss that there is no longer a HLO dedicated to this. We would recommend that when ensuring that the National Marine Plan aligns with other policy priorities and government strategies that it also compliments the strategic objectives in the current National Plan for Scotland's Islands.

We would recommend that HLO5 be amended to "Enable consistent, transparent and inclusive decision making..." to ensure that communities are brought into the decision-making process. During our [community workshops](#) around Scotland, as part of the [Oceans of Value](#) project, the importance of community involvement was strongly voiced by participants. Some of the key points raised included placing more importance on local expertise, making consultations more accessible and avoiding using exclusive language (such as the term "stakeholder").

We would also recommend that the wording of HLO2 should be consistent with the new Biodiversity Framework 2030 and 2045 targets, for example with terms such as restored and regenerated biodiversity.

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Climate change mitigation and adaptation

3. What are your views on the policy ideas proposed under the 'Climate Change Mitigation and Adaptation' section?

The Trust strongly supports policies that tackle the twin crises of climate change and biodiversity loss in tandem as these issues are often intrinsically linked. However, it is imperative that Net Zero ambitions do not come at a detrimental cost to the wider environment and biodiversity. We agree with the feedback to ensure that the wording of climate policies is sufficiently strong to match the urgency of action needed, given the declaration of a Climate Emergency by the Scottish government in 2019.

Significant Weight to Climate and Nature Crisis

In terms of adding “Significant Weight to Climate and Nature Crisis” The Trust supports this, reiterating the need for strong language to convey the seriousness of this policy area. It will also be important to clearly define “significant weight” and provide clarity on how policies will be implemented.

Climate Change Design, Siting and Decarbonisation

The Trust also supports the suggestion of giving favourable support to applications that can demonstrate energy efficient design. All forms of nature-based solutions must also be considered alongside decarbonisation

Nature

4. What are your views on the policy ideas proposed under the 'Nature' section of the Planning Position Statement (PPS)?

To truly have sustainable development of Scotland’s seas, nature must be at the heart of decision making. The Trust welcomes the inclusion of protection alongside restoration of nature, as limiting further damage is vitally important, alongside recovering or restoring damaged habitats.

It is important to highlight the current lack of data for many of our habitats and species, even those within protected areas, and as such baseline and ongoing monitoring must be a priority to ensure the effectiveness of policies in the plan.

Supporting Marine Protection and Enhancement

Bringing in fisheries management measures for MPAs will be imperative to properly protecting the network, this work must continue at pace with wider marine planning. There is also an opportunity within the marine planning process to consider enhanced marine protection, particularly looking outside of the MPA network to areas that would also benefit from protection or recovery and improve connectivity. The Trust would welcome a policy that “preserves restoration and enhancement sites from wider activity that may have an adverse impact on the site” ensuring that nature is put first before development, following an ecosystem-based approach.

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Priority Marine Features

The Trust welcomes a policy that would follow a mitigation hierarchy with preference given to avoiding impacts on PMFs when siting and designing developments. When considering the relative sensitivities and locations of PMFs in decision making it is important to highlight the lack of data on some of these species and habitats and to ensure that a precautionary approach is being taken when evidence is lacking. It is also important to follow an ecosystems-based approach to management that considers the need for connectivity between habitats.

Nature Inclusive Design

Considering nature throughout the design process including the supply chain and lifespan of the project would be a positive step to considering the full effect of a development, as well as identifying where nature-based solutions could be implemented.

Nature Positive Use and Development

The Trust welcomes the inclusion of supporting monitoring programmes/research and ocean literacy projects in the definition of nature positive measures.

Our new project [Sea the Connection](#) is focusing on Ocean Literacy, as a direct result from conversations with communities during the [Oceans of Value](#) project. Participants told us they wanted there to be a greater awareness and knowledge amongst the public on marine issues, to help increase people's confidence in getting involved with policy. Ocean Literacy Strategies have recently been developed in [Wales](#), a first for the UK and Europe, and plans are underway to develop a strategy for England. The Trust would urge the Scottish Government to consider learnings from these processes and look to begin developing an Ocean Literacy Strategy for Scotland.

5. Considering the definition of 'Nature Positive' below, what are your views on how this could be implemented by different sectors, types of development and use?

As ever clear definitions and guidance for different sectors in adhering to mitigation hierarchies, a key factor in ecosystem-based management, will be imperative for successful implementation. In addition, the mitigation hierarchy needs to be robust and implemented across all developments and uses when thinking about nature positive policies.

Sustainable marine economy

6. What are your views on both the cross-sector, and sector-specific policy ideas proposed under the 'Sustainable Marine Economy' section?

Cross-sector

The Trust supports the need for sector policies to assess cumulative impacts, which are particularly relevant in the marine environment where there are no boundaries between regions. The Trust also welcomes the recommendation for a clear policy on compensatory measures that look wider than just offshore wind and are based on evidence and consider local impacts first and foremost.

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We support the intention for co-existence in applications to encourage spatial planning as well as the recommendation to have supporting policies on engagement and collaboration between sectors. With the marine environment becoming such a busy space with competing interests and uses it is vitally important that sectors can work together to achieve sustainable development and lessen the impact on nature.

The Trust welcomes the intention to provide clarity on how the national, regional and sectoral plans will work together, however we would advocate for spatial planning to not be limited to just sectoral plans and instead be the basis for all marine plans. The Trust would also like to see greater clarity on the timelines for the development of regional plans.

Sector specific

The intention to reduce the number of policies to avoid repetition would be a positive step if the outcome is to improve the implementation of the plan. The Trust also support aligning policies in the NMP with other government strategies such as the Blue Economy Vision, NPF4 and the upcoming Natural Environment Bill.

The Trust supports the key feedback on compensatory measures that there should be a strategic approach, additionally measures should be the exception and not the rule where impacts cannot be avoided. There should be a preference for measures to be site and species specific as far as possible while maximising the benefits to biodiversity.

We welcome the consideration of a Just Transition for existing marine users, acknowledging the importance of marine industries to local communities.

7. What are your views on the definitions being proposed for 'co-existence' and 'co-location' as set out below?

Co-existence: "co-existence is where multiple developments, activities or uses can exist alongside or close to each other in the same place and/or at the same time.

Co-location: "Co-location is a subset of co-existence and is where multiple developments, activities or uses coexist in the same place by sharing the same footprint or area or infrastructure."

While definitions are useful, the Trust would recommend providing some examples or options of how co-existence or co-location could work in the marine environment, to aid in implementation and provide greater clarity to decision makers.

8. Do you think the policies relating to the 'Management of Pressures' should be updated, retained or accompanied by clearer implementation guidance?

updated – to reflect new evidence

retained

accompanied by clearer implementation guidance

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The Trust broadly agrees with updating the policies to reflect any new evidence where required and including accompanying guidance to support their implementation. Any way the NMP can be made clearer and easier to use will be a positive step to ensuring compliance and ultimately achieving Good Environmental Status.

In particular the considerations of source to sea pathways for litter and other policies such as the deposit return scheme would be good additions to the implementation guidance. Similarly the feedback on underwater noise highlighting the need for further monitoring and data collection are also useful suggestions to improve the existing policy.

Accessibility and Wellbeing

9. What are your views on the policy ideas proposed under the 'Accessibility and Wellbeing' section?

Access to the marine environment is hugely important and the Trust has long been an advocate for encouraging people to learn more about the sea, for example through the development of our snorkel trail network.

Through our work with communities across Scotland on our Oceans of Value project we heard that people often don't feel they are knowledgeable enough about the marine environment and don't have the confidence to be involved in policy. We are therefore very pleased to see the mention of an ocean literacy policy area to improve education. This will be a key area of work for the Trusts marine team going forward through the [Sea the Connection](#) project.

We also welcome the acknowledgement of the important role that communities can have in decision making as a valuable source of local knowledge, and that this must be underpinned by meaningful engagement. This should include using innovative social research methods to collect information on the social and cultural significance of the marine environment and engaging at the earliest opportunity to ensure community buy in. Hosting informal events that are accessible to a wide range of people to capture lesser heard voices is also important, as well as providing feedback on how community opinions have influenced policy.

The Trust supports the consideration to update the existing policy on cultural heritage to include intangible cultural heritage such as local customs and languages which are of huge importance to our maritime history and to local communities.

As marine tourism is the highest employer within Scotland's marine economy, we welcome the intention to have policy elements which support this sector and would advocate for policies that ensure good practice is followed.

In terms of accessibility it is important to consider the findings of the [Inequalities in access to blue coastal space research report](#) (June 2023) especially with regard to the barriers and enablers to accessing the coast, both physical and social, and how this can be addressed in policy.

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Implementation

10. What are your views on the proposed policy ideas under the 'Implementation' section?

The Trust welcomes a more streamlined and transparent approach to decision making that considers cumulative effects, land-sea interactions and community buy in. One aspect to highlight that is key to implementation is resourcing which will be important to consider as the plan develops.

11. If you agree that National Marine Plan 2 (NMP2) should include prioritisation: which outcome do you prefer i.e. space for a specific use given priority, space for nature given priority?:

The Trust would prefer to see space for nature given as a priority, as this recognises the intrinsic importance of a healthy, biodiverse marine environment in underpinning sustainable use and all the benefits we as humans derive from it. There should always be significant weight given to tackling the global climate and nature crises in any decision making.

12. What are your views on policy ideas suggested in relation to 'Community Informed Decision-Making'?

The contentious nature of recent consultations has shown how vitally important it is to engage with communities in a meaningful way from an early stage. The Trust supports approaches that are participatory and inclusive, particularly where the intention is to reach lesser heard voices. It is particularly important to consider accessibility, either through funding to travel out to communities for in-person events or providing support to attend.

Co-design of measures is preferable as it gives more control and agency to communities and will help to alleviate consultation fatigue or feelings that decisions have already been made, which so often are a barrier to involvement in policy.

As stated previously the Trust welcomes the policy idea of community supported implementation whereby marine planning is used to improve ocean literacy and encourage more people to get involved in decision making.

Impacts of proposed policies

13. Do you think the policy ideas in the National Marine Plan 2 (NMP2) will impact, either positively or negatively on any of the following: Marine sectors/businesses, consenting authorities, local authorities or any other planning decision makers?

In 2022, the UN recognised that a safe, clean, healthy and sustainable environment is a human right. Sustainable development is defined as meeting the needs of the present without compromising the ability of future generations to meet their own needs. A sustainable marine environment is often a common goal among conflicting voices and is one of the main imperatives of marine planning processes.

Therefore, the Trust would argue that while there may be short term impacts on marine sectors and consenting authorities, the long-term goal of ensuring the marine environment is still a thriving space for both nature and

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people is what we should all be working towards. Mitigations such as Just Transition policies and adequate resourcing can help to alleviate short-term effects. In terms of marine tourism and wellbeing economies the effects could be positive rather than negative by improving use and investment.

In terms of looking at Scotland as a destination for global investment, we have long seen our natural environment be used in marketing various products. Arguably, pristine marine and sea loch environments are Scotland's global brand image. Marine industries rely on Scotland's seas being in a clean, safe and healthy condition, as do many of our vulnerable marine species.

As such the Trust would again argue that it is only through properly protecting and managing our marine space in an ecosystem-based approach that we can sustain development in future. We must never lose sight of the critical role that nature plays in our day to day lives, not only for the resources it provides but its own intrinsic value. Nature must always be put at the heart of decision making if we are to tackle the major effects of the twin nature and climate crises. That must always be our priority.

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