

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

The Scottish Sea Angling Conservation Network

Title Mr Ms Mrs Miss Dr *Please tick as appropriate*

Surname

Steve

Forename

Bastiman

2. Postal Address

22 Pitreavie Place
Kirkcaldy

Postcode KY2 6JX Phone Email contact@ssacn.org

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 X 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 X Yes No

CONSULTATION QUESTIONS

Please identify the main area of interest you identify with :

- Nature Conservation
- Fisheries
- Industry/Transport
- Energy
- Aquaculture
- Recreation/tourism X
- Academic/scientific
- Local authority
- Community group
- Public sector/Regulatory body
- Local Coastal Partnership

Other (Please state)

Comments

Q1. Does the NMP appropriately guide management of Scotland's marine resources?

CommentsThe inclusion of additional information regarding the recreational sector and sea angling in particular would help provide a better understanding of the relevant socio-economic and environmental issues to guide future decision making.

The draft NMP provides top level objectives but is short on definitive content especially relating to the integrated management of the various sectors.

Q2. Does the NMP appropriately set out the requirement for integration between marine planning and land use planning systems?

Comments While the need for integration between the marine and land use planning systems is recognised - mechanisms for achieving this are not.

The sectoral approach has identified some needs but requires more work and the plan contains insufficient detail as to how the various sectoral interests can be managed in an integrated way.

Q3. Does the NMP appropriately guide development of regional marine planning? What, if any, further guidance is required for regional marine planners in terms of implementation and how to interpret the NMP?

Comments NO - any Regional Marine Plans must obviously conform to the NMP guidelines, but the NMP does not clearly define:

1. How or when the marine planning partnerships are to be established
2. How regional marine plans are to be developed;
3. What process (if any) will be established to enable planners be able to adequately assess the socio-economic cost / benefits of proposals, especially where there are competing interests.
4. How the interests of sea angling (and other non-commercial recreational interests) will be represented on any Marine Planning Partnership.
5. What the relationship will be between IFG management plans and the RMPs will be and how the interests of sea angling (and other non-commercial recreational interests) will be incorporated.
6. Too many decisions appear to be being deferred for consideration.

Q4. The Marine Regional Boundaries Consultation proposed that in addition to regional marine planning, further integrated management of key marine areas would be achieved by designating the Pentland Firth; the Minches and the mouth of the Clyde as Strategic Sea Areas.

Should the NMP set out specific marine planning policies for Strategic Sea Areas?

Comments It is not clear how Strategic Seas Areas would be treated within the proposed hierarchy, or what designation as a SSA would mean in practical terms; this is compounded by the lack of detail regarding Regional Marine Planning.

Q5. Are the objectives and policies in the NMP appropriate to ensure they further the achievement of sustainable development, including protection and, where appropriate, enhancement of the health of the sea?

Comments The objectives and policies are set at too high a strategic level to assess how regional decisions would be assessed or evaluated.

Q6. Chapter 3 sets out strategic objectives for the National Marine Plan and Chapters 6 – 16 sets out sector specific marine objectives.

Is this the best approach to setting economic, social and marine ecosystem objectives and objectives relating to the mitigation of and, adaptation to climate change?

Comments The Government Economic Strategy has identified tourism as a growth sector, indicating it has major potential for future economic development – the NMP contains no strategic objectives which reflect that.

Sea angling (and many other) recreational activities occurs all around the Scottish coastline - over relatively large areas – the work necessary to outline a National Sea Angling Strategy has already been performed, it should be introduced and further developed to guide Regional Planning and to realise the full economic potential of sea angling.

Q7. Do you have any other comments on Chapters 1 – 3?

Comments

General Planning Policies

Q8. Are the general policies in Chapter 4 appropriate to ensure an approach of sustainable development and use of the marine area? Are there alternative policies that you think should be included? Are the policies on integration with other planning systems appropriate? A draft circular on the integration with terrestrial planning has also been published - would further guidance be useful?

Comments Gen 1 - There is a presumption in favour of sustainable development and use of the marine environment – sea angling (and other recreational sectors) offer this, yet sea angling (and others) lack an operational national strategy for their development and promotion.

Gen 2 / 3 – The needs and relative socio-economic costs / benefits of marine activities must be evaluated if the ‘best value’ of the marine environment is to be attained.

Gen 5/6 – Where there is potential for multiple use / impact, equal representation for all the sectors concerned should be afforded in the decision making process.

Gen 10 - Where evidence is inconclusive the precautionary principle should be applied until such time as conclusive evidence has been obtained.

The availability of accurate fisheries data will be the key for decision makers to meet the needs for maintaining healthy near-shore fish populations to support and ensure a vibrant sea angling sector.

Gen 12 – This policy is too vague – it seems to imply that adverse effects on the national conservation status of other habitats or populations of species of conservation concern should be avoided but it could be ‘open season’ on others with similar results to that experienced in the Clyde where a presumption in favour of the nephrops fishery resulted in the depletion of many fish stocks.

Q9. Is the marine planning policy for landscape and seascape an appropriate approach?

Comments

Q10. Are there alternative general policies that you think should be included in Chapter 4?

Comments

Guide to Sector Chapters

Q11. Do you have any comments on Chapter 5?

Are there other sectors which you think should be covered by the National Marine Plan?

Comments As stated previously, the requirements of the sea angling (and other recreational sectors) need to be clearly identified and articulated in the NMP. Additionally, as the recreational sector is primarily dependent on volunteers, all effort must be made to ensure their representation should not be diminished through lack of resource.

Sea Fisheries

Q12. Do you have any comments on Sea Fisheries, Chapter 6?

Comments

Q13. Are there alternative planning policies that you think should be included in this Chapter?

Comments

Aquaculture

Q14. Does Chapter 7 appropriately set out the relationship between terrestrial and marine planning for Aquaculture? Are there any planning changes which might be included to optimise the future sustainable development of aquaculture?

Comments

Q15. Do you have any comments on Aquaculture, Chapter 7?

Comments

Q16. Are there alternative planning policies that you think should be included in this Chapter?

Comments

Wild Salmon and Migratory Fish

Q17. Do you have any comments on Wild Salmon and Migratory Fish, Chapter 8?

CommentsThe chapter totally ignores all other near-shore migratory species eg: elasmobranchs, pelagic and demersal species – the potential impact of electromagnetic fields on elasmobranchs would have far greater impact than that on salmonids yet would not be considered within the planning process based on Chp 8.

Q18. Are there alternative planning policies that you think should be included in this Chapter?

Comments

Oil & Gas

Q19. Do you have any comments on Oil and Gas, Chapter 9?

Comments

Q20. Are there alternative planning policies that you think should be included in this Chapter?

Comments

Carbon Capture & Storage (CCS)

Q21. Do you have any comments on Carbon Capture and Storage, Chapter 10?

Comments

Q22. Are there alternative planning policies that you think should be included in this Chapter?

Comments

Offshore Renewable Energy

Q23. Should the NMP incorporate spatial information for Sectoral Marine Plans?

CommentsYES

Q24. Do you have any comments on Offshore Renewable Energy, Chapter 11?

Comments More research is required into the effects of electro-magnetic fields on different species and migratory species before planning allows the introduction of networks of inter-connectors and main power transmission cables.

Compensation for those businesses dependent on sea angling which are adversely impacted through displaced fishing activity should be considered as without a better understanding, there may be long lasting impacts.

Q25. Are there alternative planning policies that you think should be included in this Chapter?

Comments

Recreation and Tourism

Q26. Do you have any comments on Recreation and Tourism, Chapter 12?

CommentsThe objectives are laudable, however, there is little in the way of definitive and proactive initiatives – this is consistent with our past experience when it comes to sea angling – a National Sea Angling Strategy is an absolute pre-requisite if sea angling is to be developed.

Q27. Are there alternative planning policies that you think should be included in this Chapter?

Comments

Transport (Shipping, Ports, Harbours & Ferries)

Q28. Should the NMP specifically designate national significant ports/harbours as described in Chapter 13: Marine Planning Policy Transport 2?

Comments

Q29. Do you have any comments on Transport, Chapter 13?

Comments

Q30. Are there alternative planning policies that you think should be included in this Chapter?

Comments

Telecommunication Cables

Q31. Do you have any comments on telecommunications, Chapter 14?

Comments

Q32. Are there alternative planning policies that you think should be included in this Chapter?

Comments

Defence

Q33. Do you have any comments on Defence, Chapter 15?

Comments

Q34. Are there alternative planning policies that you think should be include in this Chapter?

Comments

Aggregates

Q35. Do you have any comments on Aggregates, Chapter 16?

Comments

Q36. Are there alternative planning policies that you think should be included in this Chapter?

Comments

Business and Regulatory

Q37. Please tell us about any potential economic or regulatory impacts, either positive or negative, that you think any or all of the proposals in this consultation may have.

Comments

Equality

Q38. 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

Q39. If you answered yes to question 23 in what way do you believe that the creation of a Scottish National Marine Plan is discriminatory?

Comments

Sustainability Appraisal

Q40. Do have any views/comments on the Sustainability Appraisal carried out for the NMP?

Comments
There is no recognition in the appraisal of factors affecting sea angling and the potential impacts on near-shore fish stocks and no overall requirement for other sectors to consider their environmental impact on sea angling whatsoever. What happened to non-commercial fish stocks in the Clyde and others areas due to poor planning and mismanagement should surely have emphasised the need for such.