

## 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

Royal Town Planning Institute in Scotland

Title Mr  Ms  Mrs  Miss  Dr  Please tick as appropriate

Surname

McLaren

Forename

Craig

### 2. Postal Address

18 Atholl Crescent

Edinburgh

Postcode EH38HQ

Phone 01312299628

Email scotland@rtpi.org.uk

### 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)

Professional body and charity

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

Para 1.2

There should be a clear definition of Sustainable Development (see para 1.2.1 of the Interim SA Report) and a clear statement of policy that the Marine Plan will work to deliver this.

Para 1.6

Comments on the Interim SA report are included below.

Para 1.7

In Scotland the powers of the Crown Estate Commissioners should not apply but should be exercised by the Scottish Government.

Para 1.8

Clarification would be helpful of the term ***relevant consideration***.

Para 2.2

It would be useful if the various requirements of *Good Environmental Status* could be made explicit at the appropriate section.

Para 3.1

The National Marine Plan should nest under the National Planning

Framework, which should overarch all other national strategies, and itself make explicit a requirement to deliver sustainable development. The Government's central purpose is not *sustainable economic growth* (which is the means cited, but which is nowhere defined) but is as set out in Para 7.1.

Para 3.2

The minimal overlap suggested will not ensure effective harmonisation. This will require sound and appropriate management. A mechanism to achieve this might be Integrated Coastal Zone Management Planning. At the very least there should be joint planning consideration of the visual envelope, including landscape and seascape, which contains the land/sea interface. This should also include any changes which might be anticipated as a result of the effects of climate change, its mitigation and adaptation to it.

Para 3.3

Consistency of planning policy and guidance is supported: in particular there should be no presumption in favour of development, and there should be specific reference to a commitment to sustainable development.

Para 3.4

There should be mention of the Sustainable Land Use Strategy, and this should also be reflected in management of the land/sea interface and ICZM in particular.

Figure 4.1

Aquaculture: It may be appropriate to set a target of sustainable populations.

Tourism and recreation: Effective conservation management of the visual envelope at the landscape/seascape interface will be important, and challenging. Some kind of seascape quality evaluation appears to be essential.

Marine transport: environmental risks of shipping and pollution should be examined, with thought given to the management of traffic.

Military activities: military and other dumping grounds, if any, will also require careful assessment and management.

Coastal Protection: The practical challenge here seems likely to be more about managing change rather than safeguarding, enhancing or protecting.

Para 5.3

See reference to dumping in 4.1 above.

Para 6.7

Visual aspects of landscape and seascape should feature here.

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

Para 7.1

There should not be a presumption of use for the marine area. There is not a presumption of use for the land area. Rather, there should be clear policies and plans based on the principles of sustainable development: the Scottish Planning Policy may be a helpful starting point but the Institute would also draw attention to the principles enunciated [here](#).

*“This page sets out the shared UK principles of sustainable development in the UK. They apply to the UK Government, Scottish Executive, Welsh Assembly Government and the Northern Ireland Administration. For a policy to be sustainable, it must respect all five principles. We want to live within environmental limits and achieve a just society, and we will do so by means of sustainable economy, good governance, and sound science”.*

Para 7.3

Target references over the period to 2011 should be refreshed or removed.

Para 7.4

There should be reference to the Sustainable Land Use Strategy, Scottish Planning Policy, and the National Planning Framework.

The second bullet point after Productive Seas should refer to landscape and seascape as important aspects of the marine and coastal environment.

.

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

Something should be said about the relationship of marine and coastal zone planning with the town and country planning system and the sustainable land use strategy.

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

No comment

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

Unless we are misreading the matrix, surely it should appear symmetrical about the axis of the black box line? It might be clearer to show only the lower half filled in.

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

No comment

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

No comment

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

No comment

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

No comment

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

No comment

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

No comment

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

No comment

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

No comment

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

No comment

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

No comment

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

No comment

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

No comment

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

No comment

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

No comment

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

No comment

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

No comment

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

No comment

**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