



National Marine Plan 2 Planning Position Statement

February 2025

Introduction to Scottish Environment LINK

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 40 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organisations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment. Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK works mainly through groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits. This consultation response was written by LINK's Marine Group.

High level objectives

Development of draft National Marine Plan 2 (NMP2) high-level objectives (HLOs) has been informed by the legal requirements set out in the Marine Acts and other existing legislation and strategies (detailed in Section 3 of the Planning Position Statement (PPS) consultation paper).

Please read Section 4 High Level Objectives in the PPS consultation paper before answering the following question(s).

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.

LINK members welcome in principle the reduction of the number of draft high-level objectives (HLOs) proposed for the National Marine Plan 2 (NMP2), the alignment of language with existing duties on Scottish Ministers, and the process to iteratively incorporate outcomes from workshops and stakeholder discussions. However, we feel the revised draft HLOs have now been oversimplified in relation to the previous iteration of HLOS, and of the High-Level Marine Objectives of the current National Marine Plan, with a greater framing around economic opportunities and a reduced focus on community involvement and priorities. We are concerned that the simplified HLOs may weaken the General Policies from the current National Marine Plan, such as General Policy 9, as the simplified language may be more open to interpretation on how it is applied to developments.



HLO1 Mitigate and adapt to the impacts of climate change in Scotland's seas.

HLO2 Protect and enhance Scotland's marine nature to support functioning and resilient ecosystems.

Achieving Good Environmental Status (GES), and enabling the much-needed recovery of marine ecosystems, requires a realistic approach that acknowledges the existing depletion of marine resources. With an already diminished baseline, the HLOs should be framed proportionally, recognising the challenges posed by biodiversity loss, compromised ecosystem services, and climate impacts. Prevention of damage through appropriate prioritisation of activities, and incentivisation for industry to do no harm to the environment as the first priority in accordance with the mitigation hierarchy, will be an important aspect of delivering on these objectives. We would also like to see reference in the HLOs to how the NMP2 will tackle climate change at its root causes and address the source of the crisis, as well as mitigate and adapt to the impacts.

These two objectives should also align through NMP2 policy framing in a way that recognises the interconnectedness of climate change mitigation and biodiversity conservation and the potential for achieving co-benefits. Healthy ecosystems can play a vital role in mitigating climate change and Scotland's Net Zero ambitions should not come at the expense of biodiversity. We support an acknowledgement and understanding of how to address climate and nature considerations in tandem, buy-in from all parties on the importance of addressing both considerations simultaneously, and tangible mechanisms and tools for ensuring the policy is acted upon and implemented. We are highly supportive of any further protection for nature-based climate mitigation. Areas of blue carbon also provide a vital role for supporting nature (e.g. seabird populations and important areas for fish and shellfish), so protecting these areas is a win-win for nature and climate.

We note the point of feedback under section 4.3.1 "Mention of Scottish Biodiversity Strategy is not needed". LINK members feel it is essential to reference the SBS as a long-term plan for nature recovery by 2045, that aligns with the timeframe of the Blue Economy Vision, and is underpinned by the equal importance of the biodiversity crisis to the global climate emergency.

HLO3 Support sustainable economic development and use of Scotland's seas.

This draft HLO is a welcome improvement on the previously drafted *Sustainable Marine Economy* HLOs. LINK members would prefer the wording of this HLO to be as follows: "Support sustainable development and use of Scotland's seas". The use of "sustainable development", rather than "sustainable economic development" is a more appropriate framing for this objective as economic development is already embedded within the 5 principles of sustainable development, alongside using sound science responsibly and promoting good governance, as a means to achieve the goal of sustainable development: a strong, healthy and just society living within environmental limits.



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Furthermore, the focus on sustainable development is more in line with international priorities and commitments (e.g. Sustainable Development Goals, Convention on Biological Diversity) and will help reduce conflation that economic activities might surpass conservation priorities or overlook communities.

It is also important that the NMP focuses on protecting existing sustainable uses of the marine and coastal environment and highlight opportunities to improve these, particularly where they are already important to local economies.

The previous iteration of NMP2 had a HLO of *Coastal community and island development (to create and protect sustainable resilient and diverse marine economies)*. This has been removed but we would welcome the aspiration behind it being reintroduced to keep the emphasis on coastal communities.

HLO4 Enable safe and fair access to Scotland's coast and seas, whilst protecting and promoting valuable cultural assets.

Access to the coast and marine environment is essential. Many people have never been or do not get many opportunities. Research published by Devenport *et al.* 2021¹ showed that 8.6% of over 300 young people surveyed in Scotland have never visited the coast and that there is a significant relationship between how close people live to the coast and how frequently they are able to access it. Enhancing access to the coast therefore needs to focus on people living further inland, which will mean greater consideration or integration with other policy areas, such as transport and education, in line with Scotland's Blue Economy Vision outcomes for ocean literacy.

Equitable access can foster a connection with the marine environment, potentially leading to increased public support for conservation efforts, but it must acknowledge environmental limits. Shared stewardship emphasises collective responsibility for protecting the seas, but it is unclear how the Scottish Government see this translating to concrete actions that prioritise environmental protection and sustainable development. Both these points are connected to ocean literacy and environmental education/awareness raising, not just for promoting responsible use of the marine environment, but also to encourage more active participation in marine stewardship.

The wording in this HLO has been changed from 'heritage' to 'assets' and we recommend this change is reversed as the NMP2 should aim to protect and promote not only physical pieces of culture but

¹ <https://doi.org/10.1016/j.marpol.2020.104312>





Scotland's rich and intangible coastal heritage, including storytelling, songs, place names, weaving and knitting, and the history of our places.

HLO5 Enable consistent and transparent decision making to ensure sustainable use of Scotland's seas.

We support the best available evidence being used in decision making, but in parallel we acknowledge that the marine environment is dynamic and constantly changing, and there will always be data gaps. This draft HLO should perhaps also acknowledge the need for a precautionary approach to decision making, where necessary, particularly as the NMP2 must deliver against an already diminished environmental baseline, and many aspects of the marine environment remain data deficient.

LINK members also emphasise that there are multiple sources of information that can help inform decision making and the NMP2 should incorporate and apply these within its policies. This includes local or traditional knowledge and cultural insights, as well as scientific evidence and industry monitoring.

LINK members would like to see HLO 5 rephrased as: "Enable consistent, transparent and inclusive decision making to ensure sustainable use and shared stewardship of Scotland's seas". We believe this better reflects the collective ambition of coastal communities^{2 3} and stakeholders to have a greater voice in decision making for the marine environment, and aligns with the Scottish Government's Blue Economy Vision.

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

Please give us your views

As outlined in our response to question 1, LINK members appreciate that reducing the number of HLOs is potentially beneficial for improving clarity and understanding of the National Marine Plan 2. We also support the emphasis on addressing the climate and nature crises, which should underpin planning decisions. However, we are concerned that these draft HLOs are over-simplified and are potentially

² https://scottishwildlifetrust.org.uk/wp-content/uploads/2023/12/202307_Oceans-of-Value-Reports_07-DOC-003.pdf

³ <https://doi.org/10.1016/j.marpol.2024.106363>



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open to interpretation. The High-Level Marine Objectives in Annex B of the current National Marine Plan are appropriately framed by the principles of sustainable development, principles which must also be central to the NMP2. The draft HLOs presented in the draft PPS do not faithfully reflect those sustainable development principles.

Climate change mitigation and adaptation

National Marine Plan 2 (NMP2) will include dedicated policy(ies) on climate change mitigation and adaptation, setting out specific implementation criteria to guide decision-makers.

Please read Section 5.1 Climate Change Mitigation and Adaptation in the Planning Position Statement (PPS) consultation paper before answering the following question(s).

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

LINK members welcome the proposals for broad policies on climate change (mitigation and adaptation) and these should build upon and strengthen the General Policies adopted through the current National Marine Plan. Not only should planners seek to transition to net zero in their developments, businesses and supply chains, they should actively seek opportunities to protect and enhance blue carbon habitats and species. It is important that this principle is considered at an ecosystem level and aligns with policy priorities for nature.

Climate policy idea 1: Significant Weight To Climate And Nature Crisis

In principle, LINK members support policy idea 1: significant weight to climate and nature crisis. This reflects and aligns with National Planning Framework 4 (NPF4) Policy 1, which states: “When considering all development proposals, significant weight should be given to the global climate and nature crises.” LINK members believe that more appropriate wording for this policy idea would be “Significant weight to addressing the climate and nature crises” as it makes the intention of this policy clearer.

Clear guidance would be needed on what constitutes “significant” weight and how this is prioritised in relation to different sectors and development opportunities. The guidance should be framed in terms of fulfilling the legislative requirement to achieve GES. There also needs to be clear guidance on weighting of decisions in relation to climate and nature priorities. This policy includes reference to the climate and nature crises, which is appropriate as the two are intertwined and actions to address one can support goals for the other, and vice versa (e.g. Nature-based Solutions). However, this framing



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should not open up trade-offs between climate and nature priorities, and sectoral planning must also align. In the context of an already modified and diminished marine environment, prevention of further environmental damage should be the prevailing primary consideration, in line with the mitigation hierarchy.

Climate policy idea 2: Climate Change Design, Siting And Decarbonisation

We are supportive of the need for development proposals to demonstrate resilience to climate change and coastal change over the lifetime of the development but recognise that developers and sectors will need support in helping to identify and mitigate against predicted climate change impacts including at the local level.

We strongly support the needs for decommissioning to be considered in developments and for NMP2 to encourage the use of natural enhancement, restoration and ecosystem services such as flood defence, nutrient cycling and carbon sequestration. The effect of potential developments on these ecosystem services will need to be based on the best available scientific evidence, particularly on which species and conditions create the opportunity for carbon sequestration. Where evidence is lacking, a precautionary approach should be adhered to.

Nature

Policy ideas for ecosystem health, protection and restoration, and enhancement include suggestions to consider National Planning Framework 4 (NPF4) Policy 3 on:

- nature positive developments and nature-inclusive design
- policy on enabling space for nature (including restoration, recovery and enhancement)
- priority habitats and priority marine features (PMFs)

Please read Section 5.2 Nature in the Planning Position Statement (PPS) consultation paper before answering the following question(s).

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

Nature Policy idea 1: Supporting Marine Protection And Enhancement

Nature Policy idea 2: Priority Marine Features

Nature Policy idea 3: Nature Inclusive Design



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Nature Policy idea 4: Nature Positive Use And Development

As highlighted under the climate change policy ideas, LINK members welcome the proposals for broad policies on nature and these should build upon and strengthen the General Policies adopted through the current National Marine Plan, in particular General Policy 9. General Policy 9b has triggered appropriate responses to environmental damage or risk, such as the urgent designation of Loch Carron MPA. However, significant gaps still remain in terms of both site and species protection and, in light of the most recent assessment of the Biodiversity Intactness Index, showing Scotland as one of the most nature-depleted countries in the world, policies for nature must be strengthened and must underpin all planning decisions.

The policy ideas in this section regarding PMFs state: “NMP2 could include an updated policy for PMFs that sets out how to consider the relative sensitivity and locations of PMFs in decision making, based on available data.” LINK members’ view is that this should build on and be considered in addition to the current NMP General Policy 9, which requires that developments and activities should not impact the national status of PMFs. The NMP2 policies should strengthen those already adopted through the NMP.

We are highly supportive of an ecosystem-based approach to decision-making that is underpinned by sound science of the cumulative impacts of shared activities within the marine environment. We are also supportive of an ecosystem services level of thinking in marine planning and would like to see this policy area researched and developed further.

We would support restoration and recovery being a requirement for strategic areas to include and/or for regional marine plans to allocate a minimum area for restoration in their spatial plans. These areas should be based on the highest priority needs for restoration and recovery and not the left-over spaces least suitable for other sectors. When considering restoration areas and targets there is a need to understand baseline levels and objectives of potential projects. There is also a need for NMP2 to implement policies on monitoring requirements for such areas.

Unsuitable sites for any type of development should be returned to nature and we would support NMP2 policies that help achieve this. There would be a need for any areas identified to be communicated effectively with presumption against further development.

Biosecurity is mentioned within NMP2 but it should be recognised under Policy 3, nature inclusive design. NMP2 should include an expectation for biosecurity as well as nature to be considered through the life cycle of developments including design and transport of people and goods. The risk from





different sectors should be considered and existing good practice (e.g. as publicised by the recreational boating industry) can be highlighted.

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?

Definition of 'Nature Positive' in the Scottish Biodiversity Strategy (SBS):

"Reversing the downward curve of biodiversity loss so that levels of biodiversity are once again increasing, bending the curve of biodiversity loss."

LINK members agree in principle with the definition of nature positive, but emphasise that clear guidance is needed on how it is applied through planning and development in the marine environment. Nature positive planning and conservation policy must place priority on prevention of further environmental damage and biodiversity loss, which is ecologically and economically more nature positive than recovery and restoration efforts following environmental damage. Scientific evidence demonstrates that non-disturbance of ecosystems is far better in terms of biodiversity and ecological processes than the outcomes of recovery following disturbance or damage⁴. This is underscored by the mitigation hierarchy, which is key to ecosystem-based management of activities and sustainable development. Nature positive planning should also focus on stabilising ecosystems and promoting resilience to ensure more successful active restoration, as well as tackling the causes of biodiversity loss and climate change. Restoration and enhancement efforts will have reduced outcomes if the causes are not addressed as a priority.

Where a development must take place and impacts to the environment cannot be avoided, there should be a presumption in favour of nature recovery. A nature positive approach should give priority to developments which promote biodiversity gain or restoration, going beyond any mitigation and compensation measures that are required of a particular project.

Sustainable marine economy

Several policy ideas for National Marine Plan 2 (NMP2) were identified from available feedback and tested with sector representatives.

Please read sections:

⁴ <https://doi.org/10.1038/ncomms14163>





5.3 Sustainable Marine Economy – Cross-sectoral Policies

5.4 Sustainable Marine Economy – Sector Policies

5.5 Sustainable Marine Economy – Management of Pressures

in the Planning Position Statement (PPS) consultation paper before answering the following question(s).

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

Cross-sector:

CS policy idea 1: Promoting Co-Existence

CS policy idea 2: Support For Sectoral Planning

CS policy idea 3: Supporting Strategic Compensation

CS policy idea 4: Consideration Of Defence

While the Scottish Government has highlighted that the NMP2 is unlikely to have spatially explicit policies, guidance on suitable opportunities for co-existence for different marine activities while safeguarding areas of ecological importance would be helpful. LINK members would also support the consideration of how policies might include buffer zones to protect ecologically sensitive areas from indirect impacts. There is a need for NMP2 to require consideration of cumulative impacts when considering impacts on other sectors from development. The natural marine environment and its biodiversity and ecosystems has a spatial requirement in order to thrive and provide ecosystem services benefits. Any proposals involving co-existence and co-location must take into account the spatial requirement of the natural environment in relation to developments.

We are supportive of the potential for increasing the use of co-location and co-existence as long as these approaches genuinely provide mutual benefits to the environment and developments. Where environmental considerations are factored into co-location opportunities, these must prioritise overall environmental benefit and not necessarily only be considered as a compensatory measure for developments. Co-located activities must also be cumulatively assessed to ensure environmental limits are not exceeded. It is important that co-location should only be considered favourably where there is sufficient data and knowledge that there is a reduced environmental impact rather than assumption. The suitability of co-location or co-existence as options for different activities will depend on a variety of factors, including local/regional ecological conditions, cumulative impacts, types and scale of activity. Lower impact activities should be given preferential access to marine space, where



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environmental conditions allow, to incentivise good practice. We highlight the need to collate targets to understand what all different sectors are expecting from the sea, and to prioritise from that.

LINK members fully support the retention and amplification of existing NMP policies in relation to Sustainable Marine Economy - Management of Pressures. In particular we support source-to-sea management and prevention of marine litter, effective wastewater treatment to end all discharges of untreated sewage into the environment (except under true emergency conditions or exceptional rainfall) and a circular economy approach to all proposals, including an urgent need for a circular economy approach to chemicals. Our comments about INNS and biosecurity in question 4 are also relevant here.

The NMP2 should also include sectoral policies in relation to new and/or high-risk marine activities. For instance, LINK members would support a presumption against commercial deep-sea mining in Scottish waters and greater focus on improving circular economy policy implementation to prevent the need for extraction of deep-sea metals.

The current NMP framework also includes an objective to maximise exploration and extraction of offshore oil and gas deposits. The NMP2 must be a key enabler towards the achievement of Scotland's net zero targets, helping to tackle the global climate emergency by driving sustainable and responsible renewable energy development. The NMP2 should include policies for a presumption against new oil and gas exploration or extraction licences or leasing rounds in Scottish waters. Fossil fuel extraction and use is not only responsible for most of Scotland's greenhouse gas emissions, it also poses high risk to biodiversity protection and recovery (e.g. through underwater noise, chemical and hydrocarbon pollution).

Sectoral planning

LINK members are cautiously supportive of strategic compensation in principle and we have been engaging in the Scottish Government's Nature Positive Offshore Wind stakeholder programme. It is critical that the upfront focus of offshore wind development is on preventing environmental harm, with compensation serving as a complementary tool in the right context with clear sustainable biodiversity-positive criteria to deliver outcomes. There are clear issues around equivalency for compensatory measures that need to be addressed before being implemented, which require rigorous scientific evidence, monitoring, appropriate financing and transparency with stakeholders and communities.



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LINK members also wish to raise a question about how sectoral policies and the interaction of the NMP2 with Sectoral Marine Plans will provide safeguards for the environment and sustainable marine activities against unanticipated large-scale developments. The Scotwind process is an example of where this has happened, with scoping areas originally proposed for a maximum capacity of 10GW⁵ but over 25GW of offshore wind projects then being leased during 2021-2022. LINK members fully support the sustainable development of clean energy and emissions reduction to tackle the global climate emergency, but this must be done with transparency and full assessment of environmental and socio-economic impacts (e.g. on other sectors, such as fishing). Furthermore, there must be protection for public revenue from renewables developments that have been committed to environmental improvement. This year's Budget included the allocation of Scotwind revenue to address the Scottish Government's budget deficit⁶).

Sector-specific:

1. *Aggregates*
2. *Aquaculture*
3. *Cables*
4. *Energy*
5. *Fisheries*
6. *Ports and harbours*
7. *Refuse of infrastructure/sharing of infrastructure*
8. *Shipping and transport*

Aggregates:

As with any development or activity with a high degree of physical disturbance, NMP2 policies for aggregates should ensure priority protection for ecologically sensitive areas, such as essential fish habitats (EFH), and should seek to prevent or significantly reduce impacts such as noise pollution, sediment suspension, temporal issues (e.g. fish spawning seasons). The mitigation hierarchy should apply to aggregate developments and prevention of damage should be prioritised.

⁵ <https://www.gov.scot/publications/sectoral-marine-plan-offshore-wind-energy/pages/3/>

⁶ <https://www.holyrood.com/news/view,shona-robison-confirms-500m-worth-of-cuts-to-public-spending>





In relation to climate change mitigation and aggregate extraction, the carbon footprint and emissions mitigation of the development should also include ecological considerations, and important blue carbon sinks should be avoided. NMP2 policies should require recycling of aggregate materials to reduce the need to extract new resources and natural sediment transport and seabed topography should not be disrupted. Where aggregates are proposed for coastal defences, assessments should explore whether nature-based solutions for natural coastal defences can be used, either as a new project or enhancement to an existing habitat.

Furthermore, there are potential safety issues for other activities, such as fishing and recreation. The NMP2 policies should support sustainable, low impact activities and, where the environmental conditions are appropriate, these should be given preferential access.

Aquaculture:

We are supportive of a presumption against “further marine finfish farm developments on the north and east coasts to safeguard migratory fish species” (NMP2 Aquaculture policy 2) and would like to see it continued. There is a need to understand if this approach is extended to 3nm or 12nm. NPF4 has been updated to specify “open pen” fish farm developments and we are happy for NMP2 to align with this.

We would strongly support the need for NMP2 policies to require developments to comply with sea lice risk assessment mapping and must refer to comprehensive spatial data on sensitive species and sites. It is imperative that the SEPA Sea Lice Risk Assessment framework is implemented to cover all finfish farms (existing and new) and goes further than “no deterioration” where necessary in order to safeguard migratory fish species. NMP2 should also account for the other 11 impacts on wild salmonids identified in the NASCO report and how to mitigate them.

We are supportive of the findings of the RAI Committee report into salmon farming and share concern over the lack of progress that has been made from the REC report recommendations, which should be implemented as a matter of urgency. A number of the recommendations from both reports relate to marine spatial planning and the consenting process, such as a mechanism to allow for the relocation of poorly sited farms, and we would urge these to be committed to within NMP2 policies.

Current locational guidelines for new aquaculture developments represent an outdated assessment of carrying capacity and NMP2 needs to consider ongoing work between SG and SEPA to update these. In particular clarification is needed on what parameters are being used to categorise areas and whether



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these are still the most effective parameters to be used. It is also important to understand what data is being used to update the categories, whether the Sea Lice Risk Assessment framework is being reflected in the locational guidelines. We would also ask whether NMP2 will consider the Grigg's review and include policy on areas identified as unsuitable for industry (current or expansion)?

We support the sustainable development of shellfish aquaculture. The presumption for shellfish developments in SWPAs will be restrictive and harmful unless these shellfish waters have effective protection in place to achieve water quality that is suitable for shellfish farming.

There is a need to understand and clearly define blue carbon areas alongside having comprehensive restoration maps and identification of flood risk areas. NMP2 should consider whether there is a sufficient and comprehensive understanding of where sensitive species and sites actually are, including areas that are likely to become sensitive and what further work may be required to understand these.

We seek further clarification on strategic resource or prime-opportunity areas and whether these have already been identified? If so, what were the parameters assessed?

"Sustainable" aquaculture production needs to be clearly defined with appropriate training and guidance available for local authorities and other decision makers.

It is essential that aquaculture operations and any further developments are meeting the objectives of the Vision for Sustainable Aquaculture. We seek further clarification on how potential strategic areas are being defined and identified. Will these align with the locational guidelines for aquaculture, Grigg's report recommendations, and the sea lice risk assessment framework?

The NPF4 Policy 32 Outcomes state that: "New aquaculture development is in locations that reflect industry needs and considers environmental impacts; producers will contribute to communities and local economies; prosperous finfish, shellfish and seaweed sectors. Migratory fish species are safeguarded." LINK's view is that industry needs cannot supersede environmental constraints. There is a need to define "industry needs" in relation to suitability for operation including site suitability, appropriate environmental conditions and carrying capacity. Clarification is needed over the term "new development" and whether this encompasses the expansion of existing sites or only translates to new finfish farms/shellfish sites/seaweed aquaculture?

Cables:



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LINK members recognise the importance of energy distribution, particularly to rural and island communities. As with other sectoral policies, cable-laying and maintenance must follow best environmental practice and the NMP2 should provide guidance on the various considerations that will need to be taken into account. In principle we support maintaining the current cable objectives in NMP, but they will need to be updated to take into account new evidence and global benchmarks. Guidance on where environmental impacts may be more significant, including regionally and seasonally, should be provided, including on seabed disturbance and burial depth, benthic and demersal species sensitive to Electromagnetic Fields (EMF)⁷, underwater noise pollution, contamination, heat emission, and cumulative impacts. Consideration of all phases of cable developments, including decommissioning, should be covered. The policies should also align with energy planning and distribution and just transition principles. Displacement of other activities for cable laying should also be taken into account, such as fishing.

Energy:

Offshore wind infrastructure in the UK has increased by 49% since 2017⁸, and with Scotland's legislative targets for reaching net zero by 2045 (the UK by 2050), development of offshore wind will continue to increase. With increasing offshore infrastructure development also comes increasing vessel traffic, which must be taken into account in cumulative impact assessments. We emphasise the critical importance of the mitigation hierarchy and first ensure that all steps have been taken to prevent environmental harm. LINK members support the plan-led approach to delivering renewable energy developments, and parallel and indivisible workstreams to deliver compensatory measures where there are no alternatives, to ensure that these developments are nature-positive. Addressing climate change is a global and national priority, but equally as important is reversing biodiversity decline. The NMP2 policies for clean energy production must ensure that one imperative does not come at the expense of the other. Policies should be dynamic so they can effectively adapt with advancements in renewable energy technologies and ecological evidence. Policies should also incentivise innovation in energy technology to reduce or eliminate environmental impacts.

LINK members are skeptical about the potential for commercialised carbon capture and storage (CCS) as an approach for reducing atmospheric carbon dioxide. While CCS technologies are theoretically capable of reducing emissions, current evidence indicates significant under-delivery, high costs, and long deployment timelines. There is an urgent need to reduce emissions before 2030 to address the

⁷ <https://doi.org/10.1016/j.envpol.2024.123570>

⁸ <https://doi.org/10.1038/s41586-023-06825-8>





impacts of climate change - we believe reducing energy demand, increasing energy efficiency, prioritising nature-based solutions (such as blue carbon restoration) and renewable energy development should be a greater focus. Fossil fuel-based CCS risks perpetuating reliance on fossil fuels, and NMP2 policies on CCS should decouple deployment from activities that extend the life of oil and gas operations, prioritising decarbonization over economic incentives for the fossil fuel industry. Rigorous cost-benefit analysis, that compares CCS with renewable alternatives (including in terms of emissions reduction and green skills generation), should be required by NMP2 policies and transparency in this is essential to guide investment in technologies that deliver maximum climate benefits. Marine ecosystem protection, recovery and resilience must underpin any policies on CCS, and the NMP2 should ensure clear prioritisation of scalable solutions that support climate and nature objectives.

Fisheries:

Fish are a public resource and management of fish stocks and the environment on which they depend must be in the public interest. There are increasing case studies of the implementation of new tools to support the integration of fisheries management in marine spatial planning⁹. While LINK members recognise that specific spatial management policies for commercial fishing is challenging, there is a need to bring clear fisheries management guidance into NMP2 policies to ensure that:

- The plan addresses impacts across all sectors and interactions between sectors - this is fundamental to an ecosystem-based approach and a just transition
- There is clear guidance for wider fisheries management measures in relation to interactions with environmental priorities to support sustainable development of Scottish fisheries.

Regional Marine Planning is then a mechanism through which area-specific policies for fishing activities can be refined and tailored based on environmental capacity, ecological health and fishing opportunities, and in relation to other sectoral activities.

The PPS states on page 12 that: “We are taking an ecosystem-based approach to marine planning, in support of sustainable development and ecosystem-based management of human activities”. It is important to emphasise that fish stocks and fishing grounds are first and foremost a part of nature and ecosystems. As highlighted in LINK’s Living with the Seas report, management of fisheries must be appropriately incorporated in the NMP2 under an ecosystem approach to management, which centres around:

- recognizing connections between ecosystems and human societies;

⁹ <https://doi.org/10.1016/j.ecss.2017.01.003>





- valuing ecosystems for the basic goods they generate as well as for the important services they provide and their intrinsic importance;
- addressing the cumulative impacts of various activities affecting an ecosystem;
- managing and balancing multiple and sometimes conflicting objectives;
- embracing change, learning from experience, and adapting policies throughout the management process.

LINK members note the recent Parliamentary Question answered by Cabinet Secretary Gillian Martin (S6W-32232) which states: “The regulation and management of activities are covered by sector specific regulations outside of planning. Fisheries management measures form part of our ecosystem-based management but are not a national or regional marine planning matter”. Not only is this statement in contradiction to the Scottish Government’s ambition that the NMP2 should take an ecosystem approach, it is in contradiction to the UK Marine Policy Statement and the Marine (Scotland) Act 2010, as well as the Scottish Government’s ambition for fisheries management. Section 6 of the Marine (Scotland) Act 2010 states that: “A national marine plan and a regional marine plan must be in conformity with any marine policy statement currently in effect for the Scottish marine area”. The UK Marine Policy Statement is in turn clear that: “Decision makers must therefore have regard to the provisions of the [Common Fisheries Policy] CFP in developing any plans or proposals affecting fisheries” (section 3.8.3), which is now covered by EU Exit Regulations and the Fisheries Act 2020. The Scottish fisheries management policy programme includes the ambition to integrate fisheries management with marine planning. Scotland’s Future Fisheries Management Strategy 2020-2023¹⁰ states under a section about the National Marine Plan: “We recognise the need for a clear policy framework that reflects our new shared priorities and commitments and helps guide decision-making in cases where there may be conflict between different interests.” Scotland’s FFMS 2020-2030 highlights ScotMER research underway to model essential fish habitats which “will help us to consider these habitats through the course of marine planning, licensing and management.”

SMA (2020) identifies “Pressures associated with bottom-contacting and pelagic fishing continue to be the most geographically widespread, direct pressures across the majority of Scottish Marine Regions and Offshore Marine Regions.” and some

¹⁰ <https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2022/09/scotlands-fisheries-management-strategy-2020-2030-delivery-plan/documents/scotlands-fisheries-management-strategy-2020-2030-delivery-plan/scotlands-fisheries-management-strategy-2020-2030-delivery-plan/govscot%3Adocument/scotlands-fisheries-management-strategy-2020-2030-delivery-plan.pdf>





biogenic seabed habitats have declined in extent by 90% or more in some areas¹¹. Many biogenic habitats are identified as Priority Marine Features (PMFs) and given that NMP (2015) stipulated general policies for the protection and enhancement of PMFs, there is a crucial need to account for fisheries activities within the NMP2. Loch Carron MPA was designated on an urgent basis in recognition of NMP Gen Pol 9B when flame shell beds were damaged by a scallop dredger, which prompted the Scottish Government to commit to reviewing how PMFs are protected from damaging fishing activities outside MPAs.

Finally, we highlight European Environment Agency guidance¹² which includes the requirement on member states to draw on the MSFD framework to operationalise the ecosystem-based approach for the sustainable development of blue economy sectors while ensuring GES. Sectoral policies are required to achieve these objectives, but they must be aligned within the NMP2 in a way that offers clear guidance on fisheries management interactions with other sectors and the environment.

The NMP2 should support positive incentivisation of climate-smart and nature-friendly fishing. There is a role therefore for marine planning policies to provide guidance at a national level on spatial management for different fishing types and fishing activity interactions with other sectors based on tools such as:

- Distribution of high ecological value habitats, such as blue carbon and essential fish habitats, or biotopes;
- Seafloor integrity and environmental limits
- The purpose and effectiveness of existing fishery management areas
- Spatio-economic data to support separation or prioritisation of fishing sectors and between fishing and other activities.

Work would be needed to identify an appropriate spatial scale at which these policies would apply, but this could be built on to support a more granular scale of management at a regional level. With increasing developments in Scottish seas - most notably the growth of offshore wind development, which may impact the footprint of current fishing activities - it is essential that marine planning policies account for displacement of fishing activities as well as the safeguarding of sustainable fishing opportunities. Detailed assessments of fishing activities, fish stock dynamics, and habitat requirements

¹¹ <https://marine.gov.scot/sma/assessment/biogenic-habitats>

¹² <https://www.eea.europa.eu/en/analysis/publications/healthy-seas-thriving-fisheries#:~:text=Additionally%2C%20phasing%20out%20adverse%20practices,it%20is%20not%20developed%20sustainably>





throughout different life stages are needed to understand the relative value of areas for different fishing sectors to help inform spatial prioritisation in relation to ecological priorities and other marine activities. More broadly, we highlight the need to collate targets to understand what all different sectors are expecting from the sea, and to prioritise from that. There also needs to be provision for adaptation to accommodate environmental shifts that affect fishing productivity (e.g. species distribution change).

Marine planning policies for the fisheries sector must be guided by a clear understanding of environmental limits to ensure long-term sustainability. This requires robust guidance on prioritising different fishing sectors within fishing grounds while considering their overlap with conservation and recovery areas. Policies should support an ecosystem-based approach that balances sustainable fishing opportunities underpinned by the protection of critical habitats and biodiversity. Integrating scientific data on stock health, habitat sensitivity, and cumulative impacts will be essential for informed decision-making. Spatial planning tools should be used to manage sectoral interactions, ensuring that fishing activities align with broader marine conservation and recovery objectives.

Spatial policies for different fishing sectors will have significant social benefits and are an important part of a just transition for industry and communities. Gear conflict, largely between creeling and trawling activities, is still a major issue in parts of Scotland's sea area with serious social, economic and environmental consequences if damaged gear is discarded into the environment. Limited measures have been taken to reduce or prevent gear conflict since the 2015 Scottish Government consultation¹³ but proper spatial management of fishing activities, including gear separation and protection of important fish and shellfish habitat, offers a key opportunity to address this issue.

Ports and harbours:

LINK members recognise the need for onshore and coastal infrastructure to provide access to the marine environment and that these structures may need to be expanded to cater for the expansion of offshore energy infrastructure and decommissioning of oil and gas installations. Alignment with NPF4 and the key planning considerations identified for ports and harbours for different regions of Scotland will be important, particularly in the absence of Regional Marine Plans for most of Scotland's Marine Regions. Guidance on siting of ports and harbours or impacts of development on PMFs and critical marine habitats is needed, which should include consideration of construction and maintenance as well as operational impacts of vessels (such as ballast water management and waste disposal).

¹³ <https://www.gov.scot/publications/promoting-best-practice-inshore-fisheries-consultation-measures-tackle-gear-conflict-9781785448867/pages/1/>





Opportunities to enhance nature through ports and harbour development should be considered, such as using sea walls as habitat for marine species. Best practice for recycling and disposal of waste, including provision of free or low cost facilities to recycle fishing and aquaculture equipment, should be required at ports and harbours.

Reuse of infrastructure:

Whilst we are supportive of the promotion for energy efficient developments there needs to be careful consideration of and guidance for decisions makers in what lifecycle assessments are undertaken and how they should be used in decision-making. When considering the use of LCA analysis it is also important to recognise the need for standardisation of the methodology and scope to allow for useful comparison for such assessments.

Shipping and transport:

Marine planning policies should require robust pollution response measures to prevent and mitigate chemical spills and underwater noise. This includes ensuring that response plans for chemical spills are comprehensive, well-resourced, and regularly updated. Authorities should also be required to work with vessel companies to implement measures to monitor and mitigate underwater noise impacts, particularly on sensitive marine species, through vessel quieting technologies and designated quiet zones.

Policies should prioritise decarbonisation through incentivising the adoption of low- and zero-emission vessels, such as electric or hydrogen powered vessels and promoting port infrastructure capable of supporting clean energy, such as shore-side power and alternative fuel stations.

Shipping and transport infrastructure must be designed to withstand climate change impacts, ensuring resilience for island and coastal communities. Reinforcing transport networks and port facilities to handle extreme weather events and sea-level rise as well as prioritising transport and shipping access for remote and island communities to maintain connectivity and economic resilience should be considered.

NMP2 policies should promote a circular economy approach, including reuse and recycling of vessel components and construction materials.



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To reduce collision risks for species such as whales and basking sharks, policies should consider speed restrictions and seasonal routing measures in high-risk areas identified in research¹⁴, and implement real-time monitoring systems and dynamic management measures in high-risk areas to reduce interactions with sensitive species.

Policies could include limits on cruise ship activity to protect smaller ports, island communities, and sensitive ecosystems, including setting capacity thresholds for cruise ships based on infrastructure and environmental sensitivity and restricting cruise ship activity during ecologically sensitive periods, such as breeding seasons, to reduce disturbance.

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."

Please provide any alternative suggestions.

The definitions are suitable but the NMP2 must include clear guidance on where each approach is appropriate to be considered by developers and what considerations must be taken into account to ensure sustainable development. Co-existence is dependent on a robust understanding of the cumulative impacts in a given area and the environmental capacity to sustain them. Co-location is appropriate where the objectives of a development align with other developments and the environment.

Co-location of some activities particularly in relation to protected areas or nature conservation will need very clear guidance. For instance, the footprint of a wind turbine does not equate to a protected area just because it excludes other activities, as objectives and monitoring priorities are different and only of limited benefit to some species. However, in some cases there may be options for targeted

¹⁴ <https://www.science.org/doi/10.1126/science.adp1950>





nature enhancement on a case by case basis for some developments. This point was also highlighted in our Avoiding Conflict in the Marine Environment report¹⁵.

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

- updated
- retained
- accompanied by clearer implementation guidance

Please include any suggestions and/or changes, stating which policy you are referring to. Truly ecosystem-based marine spatial planning should be driven by policies that ensure the cumulative impacts of all human activities in the marine environment remains within environmental limits, supporting the achievement of Good Environmental Status (GES). The NMP2 should clearly define which activities will be supported, under what conditions, and where they may not be permitted in relation to environmental priorities or other activities. Activities that impede or delay progress toward achieving Good Environmental Status (GES) compromise the coherence of Scotland's MPA network or integrity of individual or multiple MPAs and/or significantly impact the national status of Priority Marine Features should be assigned lower priority within the planning framework, ensuring alignment with national environmental and conservation objectives.

The current NMP policies on management of pressures are all important and should be updated to reflect current evidence. Cumulative impacts must also be taken into account. Many of the policies on management of pressures can be aligned with and given more detailed guidance in sectoral policies, such as circular economy/recycling of materials and facilities provided at ports and harbours or infrastructure development.

Accessibility and Wellbeing

From the available feedback we identified potential policy ideas for exploring with sector representatives, including:

- preserving cultural heritage
- supporting coastal communities

¹⁵ https://www.scotlink.org/files/publication/LINKReports/LINK_ACME_Report0610web.pdf





- facilitating appropriate access to the sea (e.g. responsible access codes)
- minimising impacts on seascape character
- visual amenity

Please read Section 5.6 Accessibility and Wellbeing in the Planning Position Statement (PPS) consultation paper before answering the following question(s).

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

Accessibility and Wellbeing policy ideas

A&W policy idea 1: Cultural Heritage

A&W policy idea 2: Supporting Island And Coastal Communities

A&W policy idea 3: Facilitating Appropriate Access, Including Recreation And Tourism

A&W policy idea 4: Landscape / Seascape

Access to the marine environment is a critical part of sustainable development and is directly tied to ocean literacy¹⁶. Cultural heritage includes traditional industries, such as small-scale fishing, mariculture and seaweed harvesting, as well as music, art, literature and landmarks that relate to maritime cultural heritage. Feeling connected to nature influences attitudes and behaviours that promote sustainable use of natural environments, which NMP2 policies should support. Local and traditional knowledge is increasingly recognised as vital for ocean literacy, helping communities retain and share understanding of marine ecosystems. NMP2 policies must align with land-use planning to ensure that access to the marine environment is considered and prioritised in terrestrial developments that may restrict or prevent it.

Marine tourism and recreation needs greater oversight. Like the fishing sector, tourism and recreation is very variable, spanning from small leisure craft to large cruise ships, all of which have different interactions with the environment and other users of the sea. Access should be supported and encouraged, but ocean literacy must be scaled up to facilitate sustainable recreational use and tackle issues such as disturbance of wildlife. The NMP2 should require adherence to the Scottish Marine Wildlife Watching Code for recreational sea users and commercial operators. At the very least the NMP2 should retain the current objective: “Improved education and understanding of the marine environment for recreational users, including how to enjoy the resource responsibly in accordance with the Marine Wildlife Watching Code and the Scottish Outdoor Access Code”. Experiencing wildlife and

¹⁶ <https://doi.org/10.1007/s11160-020-09625-9>



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the natural environment is one of the main reasons for tourists and recreational sea users come to or travel within Scotland¹⁷. A healthy environment underpins this attraction and is important for local economies beyond the immediate access and use of the environment (e.g. hospitality, transport, local services). Good practice appropriate for the different tourism and recreation sectors should be detailed in marine planning policy and guidance.

The policy ideas on landscape and seascape focus on this concept primarily as a visual or aesthetic consideration. There is a clear balance to be struck between preserving the visual aesthetic of a seascape, particularly ones considered to be important for natural beauty (AONB) or with cultural or spiritual importance, and sustainable development of marine industries. For example, the need to develop renewable energy infrastructure and maintain areas without infrastructure for natural beauty and well being. There are both corresponding tourism benefits and conflicts associated with attractive seascapes and coastal communities, which NMP2 policies may be able to support. The NMP2 policies could consider a Seascape approach¹⁸, which is promising for scaling up an integrated process for improved ecosystem-based marine management and human wellbeing, and is potentially helpful for improving join-up between marine interests.

Implementation

The Marine Acts require that public authorities must take authorisation or enforcement decisions in accordance with the appropriate marine plans unless relevant considerations indicate otherwise.

National Marine Plan 2 (NMP2) will support decision-makers to take decisions in accordance with the plan. In line with feedback, and the outcomes of the statutory reviews, the implementation of NMP2 is being considered alongside the policy development. This includes considering and identifying the relationships and interdependencies across each of the policies in the plan.

Please read 5.7 Implementation in the Planning Position Statement (PPS) consultation paper before answering the following question(s).

10. What are your views on the proposed policy ideas under the 'Implementation' section? Please consider the role of the decision-maker and the potential introduction of prioritisation when responding.

¹⁷ <https://marine.gov.scot/information/scottish-marine-recreation-tourism-survey-2015>

¹⁸ <https://doi.org/10.1111/csp2.423>





Decision-making framework:

LINK members acknowledge the challenge of including spatial planning in a national planning framework, and emphasise the importance of supporting the rollout of Regional Marine Plans to develop a spatial approach at a regional level. However, the NMP2 should provide principles that can guide spatial planning, particularly in areas where RMPs are not yet in development. With increasing competition for space, particularly with the expansion of offshore renewables developments, the need for spatial planning guidance has never been greater. Ideally the NMP2 would provide clarity for developers and planners under what circumstances a development could go ahead in terms of spatial allocation.

A natural capital approach (referenced in section 5.7.2 of the PPS) is a key aspect of working towards a sustainable economy. The NMP2 should ensure that marine natural capital is maintained and enhanced. However, the precautionary principle should be applied where data is deficient and confidence in whether a decision will negatively impact the natural capital is low.

LINK members agree with the feedback on implementation included in the PPS, including consideration of cumulative impacts, land-sea interactions and ecosystem services. The application of the mitigation hierarchy is essential, and priority on prevention of environmental damage must be emphasised.

We agree that not all communities speak as one, and community voices (including inland) should be given the opportunity not just to participate in planning decisions, but to inform development aspirations from within their communities based on local needs. Marine sectors should also be considered appropriately. For example, the “fishing industry” is made up of multiple fleet segments with different needs and gear types and cannot be treated as a homogeneous sector. Marine planning policies should differentiate for segments within a sector and should enable decision making in relation to those different needs and their interaction with the marine environment.

We support retaining the General Policies 19, 20 and 21 from the current NMP. However, more detailed guidance and resources will likely be needed to implement these principles effectively. Currently cumulative impacts are not well assessed or addressed, particularly in relation to certain species (such as high trophic level mobile species), activities taking place within MPAs and semi-closed systems such as sea lochs, and at an industry level. For example, for the fishing industry LINK is calling for a comprehensive and transparent review to be undertaken of Scotland’s fishing capacity, inshore



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and offshore, in relation to fishing opportunities¹⁹. The decision making framework and policies must ensure consistency between NPF4 and NMP2 so that appropriate plans can be made for the areas where NPF4 and NMP2 will overlap as this boundary is dynamic (e.g. shoreline areas that come under Policy 10 of NPF4).

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?

LINK members in principle support prioritisation that gives “significant weight” to addressing the global climate and nature crises (cf NPF4) but this should not open up unhelpful trade offs between climate and nature needs. Greater clarity is needed on how this would work in practice, such as:

- how does it add strength to existing nature conservation designations - e.g. in terms of how conservation objectives are considered or prioritised?
- Could there be prioritisation of certain types of high value nature, such as blue carbon or essential fish habitats?
- Would there be a presumption for certain activities to be used in certain areas? E.g. presumption of low impact fishing in certain ecological conditions; trawling allowed where it can be proven that seabed environments can rapidly recover from disruption. This principle was given considerable exploration in a report that LINK commissioned on Seafloor Integrity²⁰.
- Priority given to or presumption in favour of development and use which supports recovery of the marine environment.

Prioritisation within NMP2 should be structured using a full range of decision-making tools, particularly spatial approaches such as statutory conservation designations (e.g. marine protected areas, Special Areas of Conservation, Special Protection Areas) as well as non-statutory areas of recognised conservation importance (e.g. Important Bird and Biodiversity Areas, and Important Marine Mammal Areas).

While NMP2 provides the overarching framework, Regional Marine Plans (RMPs) should guide place-based decision-making. Opportunity mapping should be underpinned by constraint mapping to ensure a balanced approach that considers ecological sensitivities alongside development potential.

¹⁹ <https://www.scotlink.org/publication/consultation-response-scotlands-future-catching-policy/>

²⁰ https://www.scotlink.org/files/documents/SEL_SeafloorIntegrity_Report_A4_March19-1.pdf





Prioritisation must have clearly defined, measurable outcomes to ensure accountability and effectiveness. Additionally, localisation is key, and ownership and community needs must be carefully integrated to support equitable and sustainable marine management.

It is important to recognise environmental needs as underpinning the objectives of the NMP2, and that space for nature should be given priority. However, as with the current NMP, proposals should fulfil prioritisation of the environment as a general policy test before sector-specific objectives are taken into account.

Should additional outcomes also be considered?

Please include any supporting information in your response.

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

“Community informed Decision-Making” seems quite a weak term and the description in the consultation paper is quite confusing and ambiguous. It refers to developers consulting early with communities but then also talks about participatory engagement. The “Community supported implementation” policy idea goes further and refers to empowering communities through ocean literacy to be able to input into decision-making. There needs to be much clearer guidance and agreement on:

- The definition of “communities”
- The mechanisms for input
- How the views and input of communities will be taken into account in the process
- How developers will ensure/be required to ensure the benefits of developments and services will be felt by these communities

Societal values should be central to planning and decision making. People’s perceptions about different activities, particularly in a local context, tend to be varied, and such social data have been historically under-represented²¹ in marine planning processes. We would strongly encourage a requirement on developers to engage in participatory mapping exercises prior to any applications being submitted. Particular effort should be made to include people who are directly affected, and under-represented or historically marginalised people or groups. Communities should have the opportunity to input into objectives for activities and development, and contribute knowledge and data. Better understanding and incorporating communities’ values increases trust and social acceptance and reduces potential

²¹ <https://doi.org/10.1016/j.marpol.2008.03.015>





conflict based on perceptions of particular sectors or potential trade-offs that may result from a development. For communities of place, Regional Marine Planning provides a more prescriptive framework to be able to do this, but in the absence of RMPs for all Scottish Marine Regions, and with the current hiatus on development of new RMPs, the NMP2 must provide clear principles for developers²² to account for community values.

The NMP2 planning principles should also support the flow of benefits from developments and activities to communities in accordance with just transition principles (e.g. rural communities should be able to benefit from clean affordable energy provided by local windfarm, rather than paying premium prices. Also applies to examples such as local sustainable seafood, green jobs for younger generations).

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 responding to the questions below it may be helpful to consider the potential implications on international or national competitiveness and Scotland as a destination for global investment.

Please provide details.

If the policies are developed in accordance with the principles of sustainable development and are truly ecosystem-based, the NMP2 should have a positive impact overall on the environment, marine industries and coastal communities. The policies must be supported by clear guidance on how to apply them. The marine planning framework should provide greater clarity and certainty about where developments and activities can operate while ensuring environmental health is maintained and enhanced. This will also be dependent on the data that underpins it, including opportunity and constraints mapping.

There is likely to be a significant issue in local authorities and planning authorities to implement the NMP2, particularly in areas where RMPs are not being developed. Upskilling and capacity building of marine planning expertise is needed, as well as increased capacity with the Marine Directorate and Statutory Nature Conservation Bodies to ensure cross-policy support for effective marine planning.

²² <https://doi.org/10.1016/j.marpol.2024.106363>





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