# **National Marine Plan 2 Planning Position Statement: CCN response**

**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)?**

No

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

* Nature HLO: incorporate the word ‘biodiversity’ into the wording of the objective. This should also incorporate restoration, to recognise the current level of degradation of marine ecosystems, and the need to remedy this degradation through both passive and active restoration. This would be “protect, *restore*, and enhance…”. Clarification is also needed on how this progress will be measured and the baseline used.
* Sustainable Marine Economy HLO: Robust definition of the word ‘sustainable’ is needed, such as that used in the National Performance Framework.
* Implementation HLO: Monitoring the condition of seas and impact of human activities could be included here, as it is not mentioned in any other HLO.
* Consider adding another HLO around community empowerment and involvement in marine planning decision making, as coastal communities are too often ignored in these decisions.
* Somewhere in the HLOs, the Good Environmental Status (GES) statements must be included as they were in the original HLO.

**2. Please add any additional comments on the high-level objectives (HLOs) in the space provided below.**  
While we support the intentions behind the HLOs, they are not very detailed and as such may not have huge impact. They must be followed by detailed policies throughout the plan**.**

**3. What are your views on the policy ideas proposed under the 'Climate Change Mitigation and Adaptation' section? (Section 5.1)**

We welcome the decision to require decision makers to give significant weight to climate change mitigation and adaption, and also believe that the nature and biodiversity crises should be given similar consideration.

**4. What are your views on the policy ideas proposed under the 'Nature' section of the Planning Position Statement (PPS)? (Section 5.2)**

**Suggestions:**

*General Points*

* We agree with the proposal in the consultation document to prohibit development from sites undergoing biodiversity restoration or enhancement where the development could have an adverse effect on restoration sites. This should be extended to include both passive and active restoration.
* The planning presumption against fish farm development on the north and east coast is well-founded and is suitably precautionary. It should remain in place and should be confirmed as Scottish Government policy in the NMP2.
* We also agree with the principle of nature-inclusive design. For example, fish farms should be obliged to move away from using polluting open nets, discharging pesticides into the sea, and using plastic feed pipes that pollute the sea with microplastics.
* Nature positive measures should be linked to the impacts of a development or activity, and they should deliver enhancement of similar habitats and ecosystem services to those impacted. Offsetting biodiversity loss in one place is often an inadequate alternative to protecting what has been lost.
* There is very little in the consultation document about the mechanism for reversing biodiversity loss in the sea. Significant amounts of space need to be set aside for this, particularly for seabed habitats and species. This must include places where there once were flourishing seabed communities that have since been erased, or recovery will inevitably be limited to the small percentage of seabed that is protected now.

*Priority Marine Features (PMFs)*

* We welcome the renewed commitment to consult on and introduce fisheries management measures for existing MPAs where management is required but not already in place.
* We also see the proposals for an updated policy for PMFs that set out how to consider the relative sensitivity and locations of PMFs in decision-making, and for requirements for developments to demonstrate how they will apply the mitigation hierarchy around potential impacts on PMFs, as being essential. NMP2 should also ensure that the numbers and geographical spread of PMFs must not be chipped away by individual planning decisions and that these cumulative impacts are given due consideration.
* However, only protecting the national population of PMFs is too blunt an approach. For example, the majority of wild salmon breed in east coast rivers, so most of the national population is protected from fish farm impacts by the presumption against fish farms on Scotland’s north and east coasts, but this ignores the genetic diversity of wild salmon in the many small west coast river populations which are exposed to the harm done by fish farming.
* The NMP 2015 policy of protecting the national populations of PMFs is better than having no policy to protect PMFs but we agree strongly with the following view, provided as feedback during earlier part of the NMP2 consultation:

“A policy on PMFs needs to be retained in NMP2, with recognition that the NMP 2015 PMFs policy (General Planning Principle 09, which requires protection of priority marine features (“PMFs”)) could be strengthened to align more closely with ecosystem-based management. It was also noted that the policy needs to be clearer to support implementation and protection for PMFs. Improved understanding of the location and extent of PMFs, including their quality status is needed, and in the absence of this, the precautionary principles should be applied. There is support for spatial mapping of particularly sensitive PMFs to help guide decision-making.”

While protecting PMFs is a key issue and contributes to addressing biodiversity loss, a whole site, ecosystem-based approach is needed. Far greater ecosystem, biodiversity and socio-economic benefits can be realised through applying an ecosystem-based whole site approach to MPA management.

*Habitats regulations*

* SEPA says it cannot act if the designated features of Special Areas of Conservation are at risk being harmed by activities whose consent/Controlled Activity Regulation licences pre-date the creation of the SAC, unless SEPA is presented with clear evidence of harm.  However, in “European sites” such as SACs, when it is not possible to rule out that harm is occurring “beyond reasonable scientific doubt”, SEPA and all other regulators and Government bodies are obliged to apply the precautionary principle until they have better information.
* NMP2 should provide clear guidance to SEPA and all other Scottish regulators of marine activities, on their obligations regarding the Habitats Regulations, whenever harm cannot be ruled out “beyond reasonable scientific doubt”.

**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.”**

This gives no indication of how biodiversity level increase will be measured or of any baseline used. This may not need to be in the definition but should be outlined somewhere in the plan.

Practices and developments that damage the marine environment should be avoided. Where a use is causing a biodiversity gain or allowing for biodiversity recovery, this should be supported and given priority by decision-makers.

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

**Cross sector (Section 5.3)**

*General Points*

Importantly, we do not agree with the proposal not to include specific objectives for certain sectors or to have a smaller number of policies. The impacts specific sectors can have on the marine environment are unique to each sector, and so creating more vague policies could significantly weaken the new Plan. Detail is crucial, and should not be lost from the current plan without replacement. This would also be significantly out of step with NPF4, which includes specific policies for various sectors and land uses.

Spatial planning approaches which involve local communities could be used to decide on sustainable uses of the marine environment across different sectors and reduce spatial squeeze. They should be used to balance marine uses across various sectors and avoid adverse cumulative impacts. These include for fisheries, including the possibility of broad management measures, and aquaculture.

We also agree with the proposal to consider and map potential areas of constraints, and incorporate spatial data such as sensitivity and pressures into decision making.

The “Natural Capital Approach” provides a mechanism for assisting with the prioritisation process and comparing the relative values of different, sometimes competing, objectives. This approach is fundamental to the “National Strategy for Economic Transformation” and the “Blue Economy Vision”, and should be mirrored here.The term “sustainable marine economy” is currently used in the plan exclusively to refer to industrial or commercial activities (fishing, aquaculture, shipping, renewable energy generation, tourism, etc.). This ignores the fact that a large number of non-commercial uses of the marine environment (such as wildlife viewing, future potential value of marine resources, the inherent value of the existence of healthy ecosystems) have considerable social and economic value. This is fundamental to the Natural Capital Approach and it is essential that the NMP2 does not preclude its adoption in future.

We would also like further clarity around HRA derogation, which is referred to several times through the consultation document. Does this derogation apply solely to offshore energy projects? We believe that derogation of the Habitats Regulations should not be allowed unless there is an overriding imperative national need and appropriate and sufficient measures for compensation are enacted.

*Cumulative Impacts*

Cumulative impacts of multiple activities should also be assessed. Where there is evidence of cumulative impacts, there should be a presumption against further development which could exacerbate these impacts. The **NMP 2015 policy, Gen 21 Cumulative impacts** states that “cumulative impacts affecting the ecosystem of the marine plan area should be addressed in decision-making and plan implementation”. This is essential and should be carried over into NMP2.

Despite this, cumulative impacts are often not assessed. To take finfish farming as an example, new or expanded farms are considered by local planning authorities on a case-by-case basis, on the merits of each application, with no overall spatial strategy, no attempt to assess the impact of the sector as a whole and no attempt to assess the sea’s capacity to absorb the impacts of the fish farming sector, in combination with the impacts from other sectors, and in a changing climate.

The new National Marine Plan should provide for this sort of overall assessment of capacity and impact, per sector and cumulatively, and provide clear guidance about how cumulative impacts are to be assessed. This need was also pointed out in the Scottish Marine Assessment 2020, which concluded that: “While the understanding of the impact of individual pressures (cause and effect) has merit, the reality is that Scotland’s seas are subject to multiple pressures, including those arising from a rapidly changing climate. Methods need to be developed that enable future scientific advice to take account of multiple pressures and cumulative impacts.”

*Strategic planning*

All sectors should have strategic sectoral planning at the NMP2 level, to set their direction of travel and to set out how marine spatial resources will be divided up or shared. This must include mapping of opportunities and constraints, as Marine Scotland has done previously (led by Dr Matt Gubbins) but then abandoned.

The consultation (Annex A) says that, “sectoral marine plans should establish a principle of development in areas identified within the sectoral plan. Where areas are identified in an adopted SMP, this should **set a baseline presumption in favour of the type of development being acceptable in that area**.” We do not agree. Areas with opportunities for a sector should not automatically have a presumption in favour, giving that sector priority or assured consent.

**Sector-specific (Section 5.4)**

*Fisheries*

NMP2 should also include a commitment to transition away from destructive fishing methods and improve protection of the seabed. Urgent reduction of the use of bottom-contacting gear, and a just transition for those working in this sector, should be a key objective. Fisheries 2 policy of the current plan is a good example of this, and should not be removed.

There is no mention in these proposals of the most significant finding in the SMA2020, that, “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.” NMP2 needs to clearly set out how it will address these issues.

We also agree with the need for a just transition for those who are most affected by change. One such group would be the fishers who use bottom-contacting gear. The NMP2 consultation says that the Scottish Government is, “working towards developing solutions for those impacted by change”. The fishers in many of our communities say they have heard this for years but that money has not been offered to compensate them for no longer using those methods. NMP2 should be more specific on this, rather than just “working towards developing…”.

*Aquaculture*

We share the concerns highlighted in the recent RAI report into salmon farming in Scotland over the lack of progress that has been made from the REC report recommendations, and believe these should be addressed with urgency.

The environmental impacts of the open nets used by finfish farmers should be reduced, consistent with the environmental principle of tackling pollution at source, according to a pre-specified timetable, by moving away from their use. Farms that have persistently high mortality, or that cannot meet the environmental standards set out in their licences must be closed or moved to new locations where these standards can be met.

**CCN suggests the following NMP2 sector-specific plan for aquaculture, based on the Aquaculture Marine planning policies in NMP 2015, as follows**:

***NMP 2015 AQUACULTURE 1*** contains the requirement for spatial planning, rather than only consenting farms on a case-by-case basis. There is an urgent need to know cumulative impacts of the industry at regional and national levels, as well as at waterbody level, and the carrying capacity of Scotland’s coastal seas.

We suggest the following aquaculture sector policy for NMP2:

**“NMP2 AQUACULTURE 1:** Marine planners and decision makers should seek to identify appropriate locations for future aquaculture development and use. System carrying capacity (at the scale of a water body or loch system, and at regional and national level) should be a key consideration, as should the cumulative impact of existing fish farms and other activities. System carrying capacity will be assessed by Scottish Government agencies and the national, regional and local capacity remaining will be regularly updated as the industry expands. This will form part of their statutory advice to local planning authorities and other aquaculture consenting decision-makers.”

***NMP 2015 AQUACULTURE 2*** calls for spatial planning and opportunity and constraint mapping, which is urgently needed for aquaculture, given the push to expand. This kind of spatial planning will save the industry, its regulators and coastal communities a great deal of time. The presumption against finfish farming in the north and east coasts is suitably precautionary and should be retained.

We suggest the following aquaculture sector policy for NMP2:

**NMP2 AQUACULTURE 2:** Marine and terrestrial development plans should jointly identify areas which are potentially suitable for such development (opportunity mapping) and sensitive areas which are unlikely to be appropriate (constraints mapping), prioritising the need to tackle the biodiversity and climate emergencies in all planning decisions and reflecting Scottish Planning Policy and any Scottish Government guidance on the issue. There is a continuing presumption against further marine finfish farm developments on the north and east coasts to safeguard migratory fish species.

***NMP 2015 AQUACULTURE 3***should be updated. The “*Locational Guidelines for the Authorisation of Marine Fish Farms in Scottish Waters”* uses an out-of-date and over-simplistic system to assess cumulative nutrient and particulate organic waste accumulation at waterbody scale. The existing system is not fit for purpose: Some waterbodies are excluded and it is unclear what baseline nutrient loading is used, or whether the cumulative impact is accurately assessed. SEPA has said that it intends to take over this function from the Marine Directive. SEPA should use its state-of-the-art nutrient modelling to assess the risk of eutrophication from all sources of nutrients, including existing fish farms. The carrying capacity of all interconnected waterbodies must also be assessed, as dissolved nutrients can trigger harmful algal blooms, which will be exacerbated by climate change.

We suggest the following aquaculture sector policy for NMP2:

**NMP2 AQUACULTURE 3**: SEPA will assess cumulative nutrient enhancement at the waterbody and regional scales, including all sources of dissolved nutrients. SEPA will also assess the threshold capacity of all waterbodies to assimilate dissolved nutrients, allowing for the current and future effects of climate change. New finfish farm developments will not be permitted where their dissolved nutrients would increase the likelihood of harmful algal blooms.

***NMP 2015 AQUACULTURE 5*** should be retained, due to the importance of landscape and visual amenity for coastal communities in areas such as tourism, recreation and wellbeing.

***NMP 2015 AQUACULTURE 6*** should be retained, though a revision and extension of Disease Management Areas is also needed to better control sea lice. Farms within them must all be stocked and fallowed in synchronisation.

***NMP 2015 AQUACULTURE 7*** should be expanded to specifically link SEPA’s sea lice regulatory framework to reducing harm to wild salmon and sea trout, and give more detail on assessing potential impacts of finfish farming on wild fish populations.

We suggest the following aquaculture sector policy for NMP2:

**NMP2 AQUACULTURE 7**: SEPA’s sea lice regulatory framework will ensure that sea lice from existing and new or expanded finfish farms cause no significant harm to wild salmon and sea trout. SEPA will also assess the cumulative impact on wild fish of sea lice from the finfish farming sector and will communicate this to aquaculture decision-makers as part of its statutory advice. DSFBs and Marine Directive will remain as statutory consultees on the impact of sea lice from fish farms on wild fish and their advice will be given equal weight in finfish farm consenting decisions. The Scottish Government will develop and implement plans to reverse the decline of wild salmon and sea trout populations.

***NMP 2015 AQUACULTURE 8***should be updated to acknowledge current regulations and welfare standards around seals and cetaceans.

We suggest the following aquaculture sector policy for NMP2:

**NMP2 AQUACULTURE 8**: Guidance on harassment at designated seal haul out sites should be taken into account and seal conservation areas should also be taken into account in site selection and operation. The list of designated seal haul outs will be updated.

The use of any Acoustic Deterrent Device by a finfish farm to deter seals requires a European Protected Species licence, unless the device has been proven not to disturb cetaceans. Alternative methods, including seal-proof nets, must be used before any licence application will be considered.

***NMP 2015 AQUACULTURE 9*** refers to the escape of farmed salmon. Scottish Government is bound by a commitment to NASCO to ensure 100% containment of farmed salmon. The Scottish Government has also committed to revising the technical containment rules for salmon farms but it has not yet done so. This is covered by AQUACULTURE 11. The Scottish Government has also committed to imposing fines on companies that allow farmed salmon to escape. It has not yet done this either.

There is a risk of capturing wild salmon or sea trout at sea, while attempting to recapture escaped farmed fish. A licence from NatureScot is needed before attempting this. In practice it is impossible to capture any significant proportion of escaped fish.

We suggest the following aquaculture sector policy for NMP2:

**NMP2 AQUACULTURE 9**: Any attempt to recapture escaped salmon requires a licence from NatureScot.

***NMP 2015 AQUACULTURE 10***should be updated to enhance community engagement and consent mechanisms. The Scottish Government’s Consenting pilot projects will streamline the pre-application process for fish farm developments. Island and mainland coastal communities deserve to be asked whether they want a fish farm development close to them, as the Salmon Scotland Community Engagement Charter says, and fish farming companies should respect the outcome of community votes, as Mowi has done in some island communities.

We suggest the following aquaculture sector policy for NMP2:

**NMP2 AQUACULTURE 10**: Operators should carry out pre-application discussion and consultation, and engage with local communities (defined as residents with postcodes within a certain radius of the farm development) and others who may be affected, to identify and address any concerns in advance of submitting an application. Operators should offer local communities a chance to vote on developments, in line with Salmon Scotland’s Community Engagement Charter, and should withdraw proposals if a majority is against them.

***NMP 2015 AQUACULTURE 11*** should be retained, with the added acknowledgement of our NASCO commitment to ensure 100% containment of farmed salmon in order to protect wild salmon from generic introgression, and to impose fines on companies that allow farmed salmon to escape.

***NMP 2015 AQUACULTURE 12***should be amended. The effectiveness of cleaner fish is questionable and many die while they are in the farms, as cleaner fish cannot easily be separated from farmed salmon. As a result, they are frequently killed by being passed through freshwater, chemical and physical treatments, along with the salmon. All surviving cleaner fish are then killed when the salmon are harvested. To use a vertebrate in this way is unethical.

The capture of wild wrasse is insufficiently regulated and the fishery has no quota. Wrasse are a keystone species of rocky reefs but no appropriate assessments have yet been done of their removal.

We suggest the following aquaculture sector policy for NMP2:

**NMP2 AQUACULTURE 12**: The use of cleaner fish will not be permitted if they cannot be reused or released after use. Their use will only be permitted if high standards of health and welfare can be assured at all times. Cleaner fish use will not be permitted if they cannot be prevented from passing through freshwater, chemical or physical treatments. The capture of wild wrasse for use as cleaner fish must be shown beyond reasonable scientific doubt not to affect the ecological function of rock reef and kelp habitats.

***NMP 2015 AQUACULTURE*** *13* should be reinstated.

***NMP 2015 AQUACULTURE*** *14* should be amended. The Griggs review and the *Vision for Sustainable Aquaculture* call for substantial community benefits from finfish aquaculture. At present funds from seabed leases for aquaculture are passed by Crown Estates Scotland to Local Authorities, to benefit communities. It is unclear whether only coastal communities benefit from this. Communities that host finfish farms should benefit from them to a similar extent as communities that have wind farms as neighbours. Offers of financial benefits, or benefits in kind, must not be made in advance of community votes on fish farm developments.

We also believe that the NMP2 needs sector-specific policies on the following topics with relation to aquaculture:

**Regional marine plans**: Regional marine plans should consider the potential for sustainable growth of aquaculture in their region, and areas that are not suitable for aquaculture, taking into account the policies set out above, and working in close partnership with terrestrial planners, SEPA, Marine Directive, NatureScot and other regulators.

**Best Available Technology**: Open net fish farms discharge fish waste and chemotherapeutants into the sea. This has potential to cause cumulative impacts across the sector. The Scottish Government accepts that biodiversity is in crisis and that action is needed to reverse its decline. Reducing pollution is an important part of this. The finfish aquaculture sector should reduce its overall pollution discharges, on a pre-agreed timeline, by switching away from open nets at existing and new farms, to using the best available technology in order to capture waste for processing ashore and to capture chemotherapeutants for denaturing and responsible disposal ashore.

**Biodiversity protection and enhancement**: Section e) of the NPF4 Policy 32, makes a special case for aquaculture as the only sector that is exempt from its Biodiversity Policy parts 3 b) and 3 c). NPF4 says that fish farms will “instead apply all relevant provisions from National and Regional Marine Plans”.

NMP2 should therefore include an equivalent policy for aquaculture, requiring all finfish farm developments that are national or major developments, or that requires an Environmental Impact Assessment, to conserve, restore and enhance biodiversity, including nature networks, so they are in a demonstrably better state than without intervention. This will include future management and monitoring. To inform this, best practice assessment methods should be used.

**Welfare standards**: Finfish farms must adhere to the provisions of the Animal Health and Welfare (Scotland) Act 2006. Farm operators that fail repeatedly to protect their stock from unnecessary suffering will have their operating licences removed.

**Movement of farms**: Finfish farms that repeatedly suffer mortality rates above the industry average must first reduce biomass and, if this does not reduce the mortality rate, they must move or close. This applies to mortality rates for cleaner fish as well as for farmed salmon or rainbow trout.

**Statutory advice on the impact of climate change on finfish farming**: The Marine Directive will provide statutory advice for all planning decisions for finfish farm developments, on the impact of climate change on finfish farming, including the impact of warmer water on gill disease, sea lice, harmful algal blooms, jellyfish low dissolved oxygen, and farmed fish welfare. Decision-makers must give significant weight to this statutory advice. Some sites will not be suitable for new finfish developments, due to climate change. A review of existing sites will also be conducted by the Scottish Government. The sites of some existing farms will also not be suitable for finfish farming in the near future. These farms may need to move.

**Overall impact of the sector on biodiversity**: Decision-makers considering finfish farm developments must give significant weight to statutory advice provided by NatureScot on the cumulative impact of the whole sector on Priority Marine Features.  This is in addition to their consideration of the local impact due to the development alone.

The level of detail required for just this one sector underlines the importance of retaining sector-specific policies and guidance, and a similar level of policy detail should be used for all relevant marine sectors.

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

Updated

**Please include any suggestions and/or changes, stating which policy you are referring to.**

*General:*

To achieve nature recovery, an overall policy is needed to reduce the amount of pollution discharged into the sea. This should apply across all sectors.

We agree that NMP2 should maintain the specific policies on providing planning support to the management of individual pressures from NMP2, and to clarify and strengthen language where required. We would like clarity around how managing the sea on an ecosystem basis will affect the management of fisheries and other sectors. For instance, would it be acceptable to sacrifice some PMF sites because that PMF would still be well represented elsewhere in the ecosystem? That could be a step backwards from the current NMP’s policy of not allowing the national populations of PMFs to decline significantly.

*Adaptive management and precautionary principle:*

While adaptive management is sensible in some circumstances, it is important to recognise that, when there is a likelihood of a development or activity doing harm but an absence of sufficient data to be certain, adaptive management does not negate the need to first apply the precautionary principle. It is also true that adaptive management may mean that some long-established activities, for instance those inside Special Areas of Conservation (SACs) that were consented before the SACs were designated, may be harming the features of the SACs.

NMP2 should give guidance in handling these cases, making it clear that existing activities must be reviewed and that if the Appropriate Authority is not confident beyond reasonable scientific doubt that no significant harm could be occurring, then it must act to reduce the potential harm.

NMP2 should add a policy re-emphasising the need to use the precautionary principle in situations where data is poor but environmental impacts are believed to be happening. This should be accompanied by an explanation of and guidance on the precautionary principle, when it should be used, implications of not doing so etc.

*Aquaculture:*

Regarding finfish farming, SEPA has previously stated about finfish farming that, “there is no other single sector making discharges to the water environment which have the same total cumulative extent of impacts as fish farms…” (Anne Anderson, then Head of Compliance and Beyond at SEPA (02/08/2018).

All fish farms are licensed by SEPA to discharge all of their organic waste and pesticides into the sea, putting that burden onto marine life and onto other users of the sea, for instance those whose livelihoods depend on catching crabs, lobsters and prawns which are especially vulnerable to the pesticides used to treat sea lice on farmed fish.

This sector is expanding and every new or expanded salmon farm is licensed by SEPA to add to the total quantity of pesticides discharged and the total amount of allowable harm that these chemicals do. This is diametrically opposite to the environmental principles that environmental damage should as a priority be rectified at source and on the principle that the polluter should pay. NMP2 should give guidance on how these principles should be applied to fish farm pollution.

**9. What are your views on the policy ideas proposed under the 'Accessibility and Wellbeing' section? (Section 5.6)**

**CCN Response:**

* The important role played by communities in decision making, knowledge sharing, data collection, and restoration and recovery activities should be acknowledged in NMP2. Communities should be seen as a valid stakeholder in marine decision-making and marine ecosystem recovery. This acknowledgement should be accompanied with an outline of how they will be supported to protect their local marine environment and influence decisions surrounding it.
* We agree with the consultation’s statement that “our marine economy provides vital social benefits to Scotland’s communities supporting our social wellbeing and this is supported by appropriate access to the shore and sea”. As the consultation says, NMP2 should integrate wellbeing elements across any policy that supports island communities **and, crucially, other coastal communities as well.** In practice, many small Scottish coastal communities on the mainland are as isolated as some island communities, so it is essential to recognise the need to consider local priorities in decision-making and in integrating Just Transition approaches in all small coastal communities, not only in island communities.
* In addition, while it is true that people living in rural coastal areas (including islands) are more directly impacted by what goes on in the sea, those of us in more urban coastal areas also have a valid stake, feelings and opinions on how the sea should be managed. These views must be captured and such stakeholders must not be excluded from the definition of a “coastal community” just because they do not work in a historical coastal industry.
* Scotland’s landscapes are world-class, playing a huge role in community wellbeing and acting as a significant driver of tourism. We therefore agree with the consultation that NMP2 should include a policy requiring consideration of potential impacts on landscape/ seascape qualities or character and visual amenity in decision-making. This policy should be adapted from existing General Policy 7 in NMP 2015, with explicit recognition of the role of seascapes to community wellbeing.  The policy should be supported with contextual information, including definitions, and specific guidance, including linkages to existing Landscape or Coastal character assessment methodologies. This policy should be included as part of a set of common elements within the decision-making framework.

**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. (Section 5.7)**

This is a hugely important section that needs adequately precise policy suggestions to adequately propose how NMP2 will be implemented. This section should also recognise that the present state of the marine environment is not good, and implementation should also focus on improvement, not just the avoidance of harm.

There is a clear need for full spatial plans to be developed for all sectors, uses and nature. These should be localised, with local communities given ample opportunity for input and empowerment in the process of developing these plans. The consultation document states that NMP2 will “***encourage / stimulate improvements in the spatial evidence base”****,* though it is not enough to just encourage and collate data. Full spatial planning is needed urgently.

Any streamlining of the consenting process should not reduce opportunities for community input and community consent mechanisms.

**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?**

We support the first option (priority outcome), which aligns with National Planning Framework 4 and introduces a policy for ‘significant weight’ to be given to the global climate and nature crises when considering marine decisions. Guidance on how this prioritisation would work in practice when making decisions should also be issued.

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

It is somewhat unclear exactly what these policy ideas proposed here are. More specific guidance for decision-makers should be co-developed with community groups engaged in marine issues to determine how engagement can be participatory and inclusive. This guidance could also vary slightly depending on the local contexts. Community participation in decision making should go beyond traditional consultations. Co management arrangements that empower coastal communities and ensure their active participation and consent in decisions should be developed in NMP2.

There are some difficulties in defining who belongs to communities that share a common interest, however, communities of place are relatively easy to define, according to where residents live (using the electoral roll and postcodes). This should be a standard basis for consulting communities of place. Communities of use, such as fishers, can be consulted through the groups that represent them, as well as through the communities in which they live.

The consultation is right (Annex A) to say that, “**empowering local communities in decision-making requires engagement with communities in decisions, promoting inclusion in the plan-making process**, supporting engagement around the implementation of marine plans, and encouraging participation across society by improving overall ocean literacy. The fish farming sector’s Community Engagement Charter (<https://www.salmonscotland.co.uk/site/assets/files/2691/community_charter_2016_digital_final.pdf>)  says that developers should encourage communities to vote on proposed fish farms and then respect the result if the vote is not in their favour, as Mowi has done on some islands. This is the correct approach. It should be included in NMP2 and should not only apply to island communities, as the wellbeing of all small communities depends on them being able to decide what happens in their immediate area, on which their livelihoods often depend.