Dear Ian,

Many thanks for sending through the document. I've included a few corrections to the text below which, as they aren't new comments, I haven't included in the word document you sent through.

In general I would say the document adequately explains the current situation, and that the recommendations are valid. There is a reference to the historic environment which is a positive, though as noted in my comments below there also needs to be an inclusion and awareness raising of undesignated archaeological sites (which form the bulk of the historic environment).

I note that not all of the Table 2 sector chapters included in the previous document (circulated in September 2020) are included in this version (previously there were Recreation & Tourism and Offshore Wind & Marine Renewable Energy sector chapters, under which we had added comments).

Table 1 / P35 GEN7 Seascape & landscape – comment "*Vulnerability of historic environment assets to coastal erosion and climate change ‗ .*" – this should be under the previous sector GEN6 Historic Environment, as currently this section is very limited in only taking account of scheduled monuments and historic harbours which account for a tiny percentage of historic/archaeological sites which exist and/or are at risks along the coastal zone.

Table 1 / P56 GEN13 Noise – not one that my name should be against, I didn't comment on noise

Reference on p36 and p37 to Historic Harbours Archaeology Trail leaflet – this is likely to be 2022 rather than 2021

Table 2 / P76 "*Awareness of historic character _* " - this is under "Submarine Cables" sector heading, but should be in the previous section under "Shipping, ports, harbours & ferries". Also, though not sure if it particularly matters, this was a point highlighted by myself as representing the Aberdeenshire Council Archaeology Service, rather than from Tara Murray in the Climate team.

Table 2 / P77 "*Awareness of impacts of offshore development on the historic environment*" – this is under the "Defence" heading, but should be in the previous section under "Submarine Cables". Again, noted as from Tara but is from Archaeology service

Comments submitted September 2020 also included a reference under the "Aggregates" sector heading ("Awareness of impacts of offshore development on the historic environment.")

Happy to discuss any of the above further, as required.

Kind regards,

Claire

Claire Herbert MA(Hons) MA MCIfA

Dear Ian,

North East of Scotland Regional Marine Plan Key Issues Consultation

Thank you for extending the consultation period for the above. This Key Issues consultation is a welcome step to support and guide Regional Marine Planning for the North East Scotland area.

Our comments below relate to the overall approach taken in the consultation document and we provide suggestions to help focus its purpose within the Regional Marine Planning process.

We have also provided comments on the contents of tables 1 and 2 and made suggestions for inclusion – please see annexes 1 and 2. To avoid duplication we have not divided these comments between the individual columns in either table.

We are happy to provide further advice as you progress with this important area of work.

Wider context

The development of the Key Issues document should take account of discussions which may affect priorities for marine planning at the regional level, such as:

Outcomes following the Environment Climate Change and Land Reform committee's inquiry into the implementation of regional marine planning
National Marine Plan review
Blue Economy Action Plan
ScotWind leasing process
Future fisheries: management strategy – 2020 to 2030

National Planning Framework 4

The Economics of Biodiversity: The Dasgupta Review - review which considers the relationship between the economy and biodiversity:

https://www.gov.uk/government/publications/final-report-the-economics-of-biodiversity-the-dasgupta-review

Methodology and scope of consultation

The development of this document is a good step towards building participation in the marine planning process and establishing a partnership approach, building on previous work by EGCP. It also enables a 'bottom-up' approach, capturing local issues relevant to coastal communities, organisations and individuals to be included in the Regional Marine Plan (RMP).

We that recommend the document includes a list of all contributors and stakeholders, along with a description of the consultation process, to give transparency on the scope and scale of the consultation.

The document should outline the methodology used in compiling the information it contains. This should include how the EGCP will incorporate consultation responses and keep an audit of document iterations.

Each iteration of the document should incorporate all relevant updates. For example, the Southern Trench Marine Protected Area (MPA) has now been designated so references should be to the MPA, not pMPA, and the marine region is already defined in legislation, not presumptive as per the text on page 41.

We welcome the reference to ecosystem services in the document and we support the further development of this, although this may be more relevant for the SeaCORP project. Some resources that may be of use include:

NatureScot - An ecosystem approach to marine planning – a summary of selected tools, examples & guidanceUK National Ecosystem Assessment

Relationship with the SeaCORP project

We would welcome clarification on the relationship between the Key Issues document and the SeaCORP work and outputs, either within this document or otherwise.

We understand that the purpose of the SeaCORP project is to provide an assessment of the condition of the region, a baseline of all relevant information to consider within the development of the RMP and to highlight specific regional issues to be addressed through RMP policy where possible.

There is potential for overlap of scope and duplication of effort and information between the two documents and so it would be helpful for all to understand the relationship between the two processes and how they complement each other.

Focus and framing of content

The Key Issues document covers a broad range of subjects, some of which sit outside the framework provided by the National Marine Plan (NMP). We suggest explaining this in the introduction and that the document also captures opportunities, aspirations, information and areas for alignment with relevant LocalDevelopment Plan (LDP) policy.

With this in mind, it may be helpful to note if comments included under each policy are an issue/problem that requires addressing through or can be influenced by the RMP, an opportunity or an aspiration, or an opportunity for alignment with an LDP. This may be something to consider for future iterations.

It can be useful to consider how the Key Issues report will feed into the Regional Marine Planning process to ensure that the contents are targeted at the appropriate level. Similarly, it can help to keep in mind how the RMP will be used by developers and in the decision-making process for marine licenses in the region. Some local issues may not be relevant in a RMP as policy but it can be useful to identify them and show that they have been considered as part of the process.

It is not always clear how some of the issues in the document relate to Regional Marine Planning or contribute to discussions on marine planning policy, for example page 30 comments on Scottish Government forestry policy, carbon-neutral agriculture and new multi-purpose forests. While it is important to align with terrestrial planning and consider the land-sea interface, it is not clear why these points are included. This is also the case with the links between active travel (page 20), flooding on farms and increased growing seasons (page 28) and marine planning.

Noting the complexity and range of issues covered, we recommend that the document text is condensed and duplicate statements removed to help the over-all flow.

Identified recommendations

The document includes many useful recommendations. However, there is confusion in the use of the terms "RMP" and "RMPP" across many of the recommendations. RMP should be used to refer to the plan and RMPP to refer to the partnership. For example, on page 28 the recommendations suggest that theRMP should work closely with NESLBAP (NESBiP) and that it will research and work with other groups. These activities would be carried out by the RMPP.

In several places (for example pages 12, 14 & 20) the document suggests that the RMPP is a decision-making body, which is not the case. The RMPP instead guides the development of the RMP, which is a consideration in the decision-making process. MS-LOT is the decision-making body in relation to marine licences and the RMPP is a statutory consultee on marine licences and pre-application consultations.
It may be appropriate to take some of the recommendations a stage further before the RMP is developed which will help to fill evidence gaps.
The outputs of such projects can support policy discussions and can help eventual policy be regionally specific and support the development of spatial policy.

There are several recommendations which do this, for example:

Page 16 - update the Sectoral Interactions Matrix produced by EGCP in 2011
Page 31 – assess the acceptability of any proposed partial loss of or damage to natural carbon sinks

Page 35/36 - develop a seascape assessment (though note that under GEN7 in annex 1 we suggest you consider a coastal character assessment)Page 68 - carry out a review of small harbours

We appreciate that some of this work may be taken forward through the SeaCORP project and that there may be resourcing and prioritization considerations around taking forward projects. It is worthwhile considering what can be done in advance, given that there is a limited time-frame in which to develop a RMP.

Usability of document

Include a heading for the final column in tables 1 and 2

Explain the colour coding of the tables and consider the use of colour to signify NMP policies and other such considerations

Split tables according to policy area to allow column widths to be adjusted – this will reduce the spread of text over many pages in certain boxes andempty spaces in others in the same row

Where NMP policies are referred to, include the text so that the NMP doesn't need to be cross-referenced – this will be easier for users and help to avoid confusion

Include each of the High-Level Marine Objectives in an appendix so that what is in each thematic area can be easily referencedLabel header columns and rows more clearly

An example of this final point is the first column in table 1. The contents are a combination of NMP policy, references to the NMP Regional Policy recommendations plus additional text such as "Developer contributions for coastal infrastructure and/or mitigation" (page 15). It's not clear where this additional text has come from or if it is something flagged by the EGCP as important to include in addition to the NMP policies and RMP considerations.

While it's helpful to include locally relevant issues, it would be useful to give the source of these headings.

We look forward to working with you as you develop the Key Issues document and Regional Marine Planning in the North East Scotland area. Pleaselet me know if you would like clarification on any aspect of our advice.

Yours sincerely

Shirley Reid

Area Officer - Tayside and Grampian