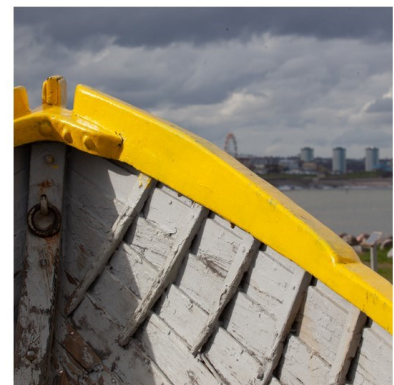
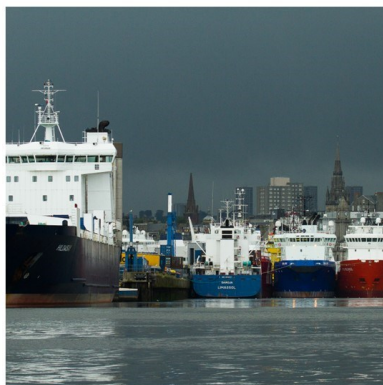
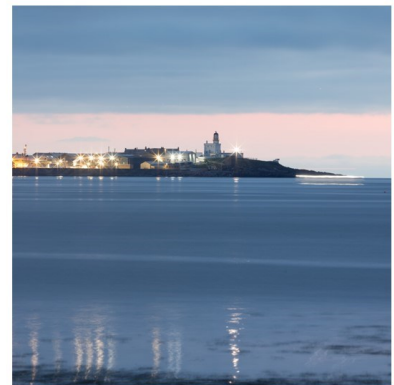


# North East of Scotland Regional Marine Plan **Key Issues Report**

**August 2022**



# Foreword



I am very pleased to be able to present to you the final Key Issues Report which EGCP has recently completed with the assistance of a number of experts to provide an up-to-date insight into the key current and future issues facing the East Grampian Coast.

This document represents a considerable amount of time and effort and will help to set the context for further discussion and engagement on marine spatial planning in the East Grampian area, particularly as we emerge from the COVID-19 pandemic and face growing concerns about the future impacts of climate change on our coast.

The information gathered in the Report has been formatted as a series of tables, and sets out to identify the key Issues facing coastal management in East Grampian as the basis to implement regional marine planning for the coastline of Aberdeen and Aberdeenshire.

This current document builds on previous work by EGCP in 2009, when the East Grampian Coastal Partnership (EGCP) undertook the completion of a comprehensive stocktake of the State of the East Grampian Coast (<https://www.egcp.scot/publications>) extending from St. Cyrus in the south to Fraserburgh in the north. The 2009 report was followed up by a number of EGCP workshops in 2017 to establish a dialogue between coastal stakeholders and to examine the potential for implementing marine spatial planning (MSP) for future management of the East Grampian coastline (<https://www.egcp.scot/marine-spatial-planning>).

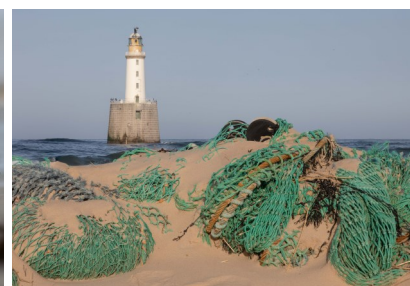
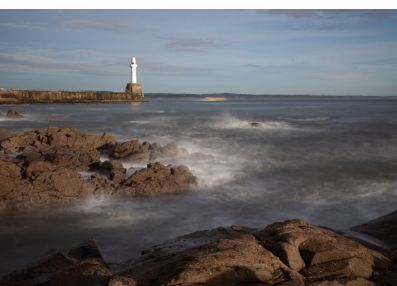
This work laid the early foundations for examining factors influencing coastal management along the Aberdeen and Aberdeenshire coast.

Although the implementation of marine planning has to date been confined to a number of pilots in Scotland, Marine Scotland is now keen to pursue the development of marine planning partnerships around the Scottish coast to develop regional marine plans.

Further information on Marine Planning, the National Marine Plan, Scottish Marine Regions and the National Marine Plan interactive (NMPi) tool to help the development of national and regional marine planning can be found on Marine Scotland's website: <https://www.gov.scot/policies/marine-planning/>.

On this basis we look forward in the future to working with stakeholders in progressing a local regional marine plan for the Aberdeen and Aberdeenshire coast and to begin a dialogue on marine spatial planning in Aberdeen and Aberdeenshire.

David Green Chair EGCP LTD



## List of organisation and abbreviations used

ACG	Aberdeenshire Climate Group	
ALDP	Aberdeen Local Plan	<a href="https://www.aberdeencity.gov.uk/.../aberdeen-local-development-plan">https://www.aberdeencity.gov.uk/.../aberdeen-local-development-plan</a>
CMPP	Clyde Marine Planning Partnership	<a href="https://www.clydemarineplan.scot">https://www.clydemarineplan.scot</a>
EGCP	East Grampian Coastal Partnership	<a href="https://www.egcp.scot/">https://www.egcp.scot/</a>
ESIFC	East of Scotland Inshore Fisheries Committee	<a href="http://ifgs.org.uk/rifg_nec/">http://ifgs.org.uk/rifg_nec/</a>
FEF	Forth Estuary Forum	<a href="https://www.forthestuaryforum.co.uk/">https://www.forthestuaryforum.co.uk/</a>
ISO	International Organisation for Standardization	<a href="https://www.iso.org">https://www.iso.org</a>
JNCC	Joint Nature Conservation Committee	<a href="https://jncc.gov.uk">https://jncc.gov.uk</a>
KIMO	Kommunenenes Internasjonale Miljøorganisasjon	<a href="http://www.fishingforlitter.org.uk/kimo-uk">http://www.fishingforlitter.org.uk/kimo-uk</a>
LCP	Local Coastal Partnership	
MFP	Moray Firth Partnership	<a href="https://morayfirth-partnership.org">https://morayfirth-partnership.org</a>
MS	Marine Scotland	<a href="http://marine.gov.scot/">http://marine.gov.scot/</a>
NESFLG	North East of Scotland Flood Liaison Group	
NESISN	North East of Scotland Invasive Species Network	
NESLBAP	North East of Scotland Local Biodiversity Action Plan	<a href="https://www.nesbiodiversity.org.uk">https://www.nesbiodiversity.org.uk</a>
NMP	National Marine Plan	<a href="https://www.gov.scot/publications/scotlands-national-marine-plan">https://www.gov.scot/publications/scotlands-national-marine-plan</a>
NMPi	National Marine Plan Interactive	<a href="https://marinescotland.atkinsgeospatial.com/nmpi/">https://marinescotland.atkinsgeospatial.com/nmpi/</a>
O&G	Oil and Gas	
OGUK	Oil and gas UK	<a href="https://oilandgasuk.co.uk">https://oilandgasuk.co.uk</a>
RMP	Regional Marine Plan	
RYA	Royal Yachting Association	<a href="https://www.rya.org.uk">https://www.rya.org.uk</a>
SEaCoRP	Scottish East Coast Review Project	
SEPA	Scottish Environment Protection Agency	<a href="https://www.sepa.org.uk">https://www.sepa.org.uk</a>
SFF	Scottish Fishermen's Federation	<a href="https://sff.co.uk">https://sff.co.uk</a>
SG	Scottish Government	<a href="https://www.gov.scot">https://www.gov.scot</a>
SIM	Sectoral Interactions Matrix	
TEF	Tay Estuary Forum	<a href="https://tayestuary.org.uk/">https://tayestuary.org.uk/</a>
TTPT	EGCP Turning the Plastic Tide	
UKCP(year)	United Kingdom Climate Projection (year)	



# Introduction

## About this Document

The following two tables highlight key marine and coastal issues in the North East Regional Marine Plan area, which may require addressing in a subsequent regional marine plan or a closer alignment with existing terrestrial planning policies.

Table 1 '**Issues by NMP General Policies**' arranges issues that best fit in the relevant general policies and under the four High Level Marine Objectives in the National Marine Plan (Annex B):

Achieving a sustainable marine economy;  
Ensuring a strong, healthy and just society;  
Living within environmental limits; and  
Promoting good governance.

Table 2 '**Issues by NMP Sector Chapter**' arranges issues by Sector chapter and under the four key issue themes in the National Marine Plan:

**Supporting economically productive activities.** Marine industries and activities contribute significantly to sustainable economic growth, which can be facilitated through appropriate management and planning;  
**Interactions with other users.** As use of marine resources increase, interactions between users are expected to increase. Management and planning can help address conflict or promote synergy.  
**Living within environmental limits.** Many marine activities impact on the natural environment and ecosystem functioning;  
**Climate Change.** Climate change and associated effects will impact on the coastal and marine environment, with some marine activities contributing to human induced climate change;  
with an additional column to include examples of good governance within each sector.

Table 3 '**Major development sites and the four key issue themes in the National Marine Plan**' arranges issues that by their multi-sectoral and -user nature (development sites) cannot easily be aligned with the NMP General Policies and Sector Chapters of Tables 1 and 2.

## Next Steps

### National Marine Plan Policies for Regional Planning

In both tables, in addition to the sector chapter / general policy title and subsequent examples of local issues in column 1 of each table, accommodation is also made for comments on the sections and policies within the National Marine Plan which provide particular guidance to assist in the process of developing Regional Marine Plans.

Regional Marine Plans will be developed by Marine Planning Partnerships, allowing more local ownership and decision-making about specific issues within their area. Regional planners will also need to consider the need for:

Better understanding of the current position and the vision for their area;  
Local strategic and sectoral objectives;  
Understanding local opportunities and challenges in terms of sustainable development and use and the need to manage conflict;  
Deriving general and specific policies which align with those in the National Marine Plan and the Marine Policy Statement, but are sensitive to local circumstances;  
Further research to understand the local ecosystem and the impacts and pressures upon it; and  
Consistency with local and strategic development plans and other relevant local plans.

Not every general policy (Table 1) and sector chapter (Table 2) in the NMP provides a regional policy, so RMP guidance is included in both tables only where explicitly mentioned.

This document is intended to be a live, working document with cells becoming increasingly populated with issues and responses made to the NMP prompts for RMP guidance at each iteration of the document.





**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN1 GENERAL PLANNING PRINCIPLE**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
			<p>Policy under the Aberdeen Local Development Plan 2017: NE7 Coastal Planning, Policy B5 Aberdeen Harbour. The existing Aberdeen Harbour area is subject to a Development Framework which explores how a greater mix of uses at the harbour can be delivered.</p> <p>In the Proposed Aberdeen Local Development Plan - Policy B4 Aberdeen Harbours and NE4 Our Water Environment which includes coastal development.</p>	Alison Leslie. Aberdeen City Council Sustainability
<p>The term sustainable is widely used and frequently misused to mean <b>SUSTAINED</b> economic development.</p>	<p>Proposals linking the new Aberdeen Harbour to the wider transport network appear to favour construction through St Fitticks Community Park. This is a major greenspace for the communities of Torry &amp; Balnagask which includes some of the most deprived communities in Aberdeen and the proposed linkages appear to unfairly affect those communities.</p>	<p>See other comments made here.</p>	<p>Coastal developments, like the new Aberdeen harbour, often utilise land which is already largely undeveloped and of high value/importance for biodiversity. The subsequent biodiversity loss is therefore frequently greater. The development of the golf course at Menie Links is another such example of current/ recent poor standards.</p>	Ewen Cameron Private Individual..
			<p>Policy R1 Special Rural Areas Of ALDP 2017 defines a coastal zone where development must require a coastal location or have social and economic benefits which outweigh any adverse environmental effect. Coalescence of coastal developments or significant adverse impacts on natural coastal processes or habitats are to be avoided. Great care must be taken to assess flood and erosion risk.</p> <p>Policy C4 Flooding requires the provision of maintenance buffer strips in coastal areas below the 10 Meter contour should local evidence demonstrate a heightened risk. In such areas land raising or excavation is controlled.</p> <p>Fraserburgh is identified as a premier fishing harbour and regeneration of the northern area at the lighthouse and beach is promoted.</p> <p>Peterhead represents one of Aberdeenshire's strategic locations in terms of the energy and oil and gas sectors. The fishing industry remains an important employer in the town. The harbour front is reserved for port related activities. It is a national development site for Carbon Capture and Storage, a possible landfall for a potential international North Sea interconnector, onshore connections to support offshore renewable energy, and major energy developments as set out in National Planning Framework 3</p> <p>The attractiveness of Banff's coastal location and its contribution to making it an attractive tourist and visitor attraction is acknowledged.</p> <p>The relationship between Macduf and the harbour is emphasised noting tourism, fishing and boatbuilding activities.</p> <p>Pennan is noted as a small historic fishing village situated within a striking and attractive coastal setting popular with visitors and tourists.</p> <p>Portsoy is identified as an attractive fishing town. Proposals for a coastal path are promoted.</p> <p>Gardenstown is identified, historically, as a fishing village, with a setting and character that has made it a popular tourist destination. It has has one of the most spectacular settings of any coastal village in Aberdeenshire.</p> <p>The St Fergus Gas Terminal is a major landfall for North Sea oil and gas products. it has and continues to play a key role within the UK's gas industry.</p> <p>Stonehaven provides an example where a traditional fishing port has evolved to capitalise on the attractiveness of the coast to tourists.</p> <p>Boddam, Catterline, Cruden Bay, Collieston, St Colms, Gourdon, Johnshaven, Newburgh,</p> <p>Rosehearty, Sandend and Pittulie, and Whitehills are all acknowledged as having their origin in their links to the sea and are acknowledged as attractive coastal Villages</p> <p>The emerging development Plan (Proposed plan published in 2020) builds on these strengths and includes acknowledgement of the Fraserburgh Harbour Masterplan (July 2019) which sets out a strategic framework for development at the harbour over the next 20 years and aims to support growth in existing markets as well as facilitate and attract new business. Like Peterhead the port area is now protected for appropriate uses</p>	Policy Team, PES, Aberdeenshire Council
<p><b>Recommendation</b></p> <p>That the RMP works with the Local Planning authorities to support sustainable economic development.</p>		<p><b>Recommendation</b></p> <p>That the RMP works closely with the Local Planning authorities to support sustainable economic development.</p>	<p><b>Recommendation</b></p> <p>That the RMP works closely with the Local Authorities to promote marine/land planning integration and ensure coastal issues are represented.</p>	Ian Hay EGCP
<p><b>Recommendation</b></p> <p>RMP needs much more explicit descriptions of what actually is and is not <b>SUSTAINABLE</b> or we will continue to see development that is simply not sustainable.</p>	<p><b>Recommendation</b></p> <p>RMP needs to be bold and honest and highlight examples of developments which don't actually comply with the aspiration to <b>ENSURING A STRONG, HEALTHY AND JUST SOCIETY</b></p>	<p><b>Recommendation</b></p> <p>RMP needs to be open and upfront with unequivocal and evidenced based demonstration of marine and on-land marine related developments that really do operate <b>WITHIN ENVIRONMENTAL LIMITS</b> and especially so for future generations who will have to pick up the socio-economic costs of all our past and current bad practice.</p>	<p><b>Recommendation</b></p> <p>RMP should include an explicit reference to the need to achieve/ deliver Biodiversity Net Gain in ALL developments, including Major &amp; National ones, as the latter should be exemplars of best practice in Biodiversity Net Gain and not be "exempt" from good practice.</p>	Ewen Cameron Private Individual.



**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN2 ECONOMIC BENEFIT**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
<p>SG's 'Blue Economy Action Plan' is set out in Programme for Govt 2020 &amp; recognises the marine sector's vast potential across seafood, tourism, energy, transport, and science. Locally, collaborative work is at an advanced stage to capture much higher levels of sustainable added value from locally landed seafood by investment in technology &amp; human capital whilst in the energy sector, transformative developments (Acorn, Hywind, Kincardine, North Connect etc) are proceeding apace.</p>	<p>In NE Scotland there are 1200 fishermen and 4000 people employed directly in seafood processing. Improving productivity and capturing more value from seafood will result in better paid and more secure jobs in future and a more resource efficient sector. The increased pace post CV-19 of the transition from O&amp;G to renewables seems likely to result in disruption for many individuals and businesses in the short term but will ultimately result in longer term benefits and opportunities for the planet and society, especially for our young people</p>	<p>Sustainability lies at the heart of all the aforementioned initiatives, from fishing to carbon capture and storage.</p>		<p>Derek McDonald Aberdeenshire Council Economic Development</p>
<p>Continued employment through sustainable fishing practices and renewable energy, while also supporting wildlife tourism</p>				<p>Alex Stuart NESLBAG</p>
<p>The Proposed Aberdeen Local Plan (ALDP) includes Policy B5 Energy Transition Zones - to support the renewable energy transition. Area identified on the ALDP proposals map.</p>				<p>Alison Leslie. Aberdeen City Council Sustainability</p>
<p>Many/most so called <u>Sustainable</u> Economic Developments are in fact <u>Sustained</u> Economic Developments. Simply stating the intention to be sustainable is insufficient and woefully inadequate in practice as the ultimate determinants usually boil down to initial capital cost and profitability. These are legitimate measures but shouldn't be hidden under the false guise of sustainability. Where they are relevant considerations, let them be evaluated on their own worth. This sort of systemic and repeated failure to identify what is genuinely sustainable has been a regular feature of many of Scotlands resource use strategies and that is, in part, why we are facing biodiversity and climate change crises.</p>	<p>The same general principle applies here as under ACHIEVING A SUSTAINABLE MARINE ECONOMY. If we cannot get the basics right, much of the rest is window dressing and we will continue to see the industries, communities and other marine based actives decline. As mentioned previously, the creation of the Aberdeen Energy Transition Zones and the linkage of the new harbour to the wider transport network appears to disadvantage (through loss of greenspace, poor air quality etc.) the communities with the highest SMID scores while they get few, if any, of the benefits.</p>	<p>The same general principle applies here as under ACHIEVING A SUSTAINABLE MARINE ECONOMY. If we cannot get the basics right, much of the rest is window dressing and we will continue to see many industries, communities and other marine based actives decline. If we are already living within environmental limits, why are so many environmental parameters still on the same downward curve they have been on since the 1950s?</p>	<p>The same general principle applies here as under ACHIEVING A SUSTAINABLE MARINE ECONOMY. If we cannot get the basics right, much of the rest is window dressing and we will continue to see the industries, communities and other marine based actives decline.</p>	<p>Ewen Cameron Private Individual.</p>
			<p>Aberdeenshire Local Development Plan 2017 makes significant employment land allocations in Fraserburgh and Peterhead to support marine industries. Over 40 ha of employment land has been allocated in these two settlements.</p>	<p>Policy Team, PES, Aberdeenshire Council</p>
		<p>'Reopening the Aberdeenshire Countryside 2021' is a response to the anticipated very high numbers of domestic tourists, and how these are likely to impact on certain tourism hotspots. A traffic light approach has been adopted to identify the magnitude of the risk to the site, and actions identified where these are already happening or proposed, to manage the influx and where possible mitigate adverse impacts on the environment..</p>	<p>The 'Reopening the Aberdeenshire Countryside' project has the benefit of offering ready access to information about all sites under pressure from increased visitor numbers, in one location, over the tourist season</p>	<p>David McCubbin</p>
<p>The area has a strong marine economy based on oil and gas, and fishing. This includes onshore support sectors. In recent years wind energy has been growing.</p> <p>The strength of the marine sector can be demonstrated with substantial investments in new harbour facilities at both Peterhead and Aberdeen, while in Fraserburgh, MOWEL-related investment for O&amp;M is underway near the harbour.</p> <p>Led by Opportunity North East, a multi-partner plan for innovation, value add &amp; coordinated investment in the seafood processing sector is well advanced</p> <p>Emphasis has been placed on the tourism sector through VisitAberdeen City and Shire and the North East 250. This can be further developed in the future depending on wildlife, historic and crucially business-related tourism. In 2019 8,000 people worked in the sector in Aberdeenshire compared to 1,300 in the fishing sector. <a href="https://www.aberdeenshire.gov.uk/media/24901/aberdeenshireseconomyannualreviewnov2019.pdf">https://www.aberdeenshire.gov.uk/media/24901/aberdeenshireseconomyannualreviewnov2019.pdf</a></p>	<p>The area has above average levels of health and employment. Average household income is £44,174 in 2019 against a Scottish average of £36,031.</p> <p>Aberdeenshire has consistent high health scores including health satisfaction, life expectancy and mental health.</p> <p>Aberdeen is around the Scottish average for reported crime, but compares favourably with other Scottish cities <a href="https://scotland.shinyapps.io/ScotPHO_profiles_tool/">https://scotland.shinyapps.io/ScotPHO_profiles_tool/</a></p> <p>Crime rates in Aberdeenshire are lower than the Scottish average however Aberdeen city had the sixth highest reported crime rate per 10,000 in 2019/20. This was lower than all the major cities except Edinburgh. This needs further investigation. <a href="https://www.statista.com/statistics/370395/scotland-crime-rate-local-authorities/">https://www.statista.com/statistics/370395/scotland-crime-rate-local-authorities/</a></p>	<p>Key issues include securing an economically vibrant and sustainable fisheries industry, offshore and onshore through the adoption of independent, science-based certification and accreditation standards.</p> <p>In addition, Tourism and recreation are growing sectors and need managing carefully to avoid conflict. In the past EGCP has worked on this with projects on quad bikes, jet skis and coastal access</p>	<p>EGCP maintains active membership of the North East of Scotland Biological Local Action Plan, The North East of Scotland Flood Liaison Group, The East of Scotland Inshore Fisheries Committee, The Aberdeenshire Climate Group and The North East of Scotland Invasive Species Network.</p>	<p>Ian Hay (EGCP)</p>
<p><b>Recommendation</b> The RMP should work to develop the marine economy by prioritising marine industries and working to enable diversification. It should also work to ensure that the area is an attractive place to live and enjoy in an effort to attract and maintain key talent.</p>	<p><b>Recommendation</b> By working to promote a diverse economy the RMP should aim to avoid the boom-and-bust economics that leads to social issues. It should also aid in reducing inequalities.</p> <p>The RMP should also promote and support outdoor activities that physical and mental health.</p>	<p><b>Recommendation</b> The RMP should also support a strong tourism sector based on minimal disturbance to landscape and wildlife, a key area for concern is the Ythan Estuary with disturbance to seals and birds through uninformed visitors. The RMP should also be supportive of diversification of local industry.</p>	<p><b>Recommendation</b> A key issue for the RMP will be working with other decision-making bodies for the benefit of the coast. Also helping to support land based supporting industries for the marine economy. This includes helping the fish processing industry during the transition brought about by Brexit</p>	<p>Ian Hay (EGCP)</p>
<p><b>Recommendation</b> RMP needs a more objective, honest and evidenced based way of demonstrating that both policies and actions are measurably sustainable. Without SMART targets and Reviews of previous Strategies, we are destined to keep repeating the same failures and make opportunities for future generations even more difficult and unattainable.</p>	<p><b>Recommendation</b> RMP needs a more objective, honest and evidenced based way of demonstrating that both policies and actions are measurably beneficial for the many and not just the few.</p>	<p><b>Recommendation</b> RMP needs a more objective, honest and evidenced based way of demonstrating that both policies and actions have been evaluated against clearly stated environmental limits which have also been determined objectively and openly.</p>	<p><b>Recommendation</b> RMP needs to be open and honest and commit to an objective and impartial review of both successes and failure at the the end of its duration or at least every every 10 years.</p>	<p>Ewen Cameron Private Individual.</p>



**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN3 SOCIAL BENEFIT**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
Continued employment through sustainable fishing practices and renewable energy, while also supporting wildlife tourism				Alex Stuart
	<p>With the help of Coastal Communities Funding, Aberdeenshire Council worked with consultants (Oct 2020 – Mar 2021) to lay the foundations for the Coast Aberdeenshire Project.</p> <p>Phase 1 (North) of the project focusses on the coast from Cullen to Peterhead.</p> <p>An extensive public engagement exercise in early 2021 has identified an inventory of sites and communities of interest where actions could be further investigated.</p>		<p>The long term (10 year) goal for the project is to establish an alternative model of management and maintenance for the coastal route, with greater emphasis on the role played by local communities. A Coastal Path Forum is being established to help increase and drive forward participative democracy making along this stretch of the coast.</p> <p>It is anticipated that any successful model of governance for this could be extended to other areas of the Coast.</p>	Environment Team, Aberdeenshire Council.
<p>Like much of the world the East Grampian Coast has been hit hard by the Covid19 pandemic and it's medium to long term effects are not yet known.</p> <p>There is particular concern over the cost and bureaucracy for seafood exports to the EU post-Brexit. and a possible downturn in the oil and gas sector.</p> <p>It is possible that the tourism sector will bounce back quickly as people will want to travel after being less able to do so in 2020.</p> <p>Overall, the highly skilled and adaptable workforce and strong local economy will help in achieving a recovery.</p>	<p>Whilst there is little available evidence as yet it is perceived that the restrictions due to Covid19 will have had a polarising effect on people's health. Many people have taken the opportunity to become more active with sales of bicycles and interest in walking soaring. Conversely the 'Covid stone' is a well discussed phenomenon with people gaining weight during lockdown.</p> <p>In both cases increasing access to the coast for active recreation is an important step forward.</p> <p>Aberdeenshire council is currently starting a major coastal access project that will help in this area.</p>	<p>Improving the local economy can have a positive impact on society. However, balancing this against landscape, environmental and amenity value is difficult.</p> <p>There have been several high-profile cases in recent years with another potentially contentious case coming up.</p> <p>A multi award winning wetland site that has attracted thousands of hours of volunteer time and over £300k in grants, has been earmarked for development. This is likely to be an issue that the RMP will become involved with.</p>	<p>EGCP maintains active membership of the North East of Scotland Biological Local Action Plan, The North East of Scotland Flood Liaison Group, The East of Scotland Inshore Fisheries Committee, The Aberdeenshire Climate Group and The North East of Scotland Invasive Species Network.</p>	Ian Hay (EGCP)
<p><b>Recommendation</b> Achieving a broader, sustainable marine-based economy will help maintain high levels of skilled employment which will lead to stability and foster good social cohesion for the area. It should be a priority of the RMP to help diversify local industry through tourism, and promote diversification in the energy sector. IH</p>	<p><b>Recommendation</b> Generating enthusiasm and opportunities for young people should be maximised through education and training for marine/coastal careers and raising awareness of the environment, with interactions between marine/coastal employers, schools and training institutions</p>	<p><b>Recommendation</b> By prioritising long term economic success over short term gain the RMP should encourage people to explore and enjoy a healthy coastal and marine environment. IH</p>	<p><b>Recommendation</b> Need to foster good links with other decision-making bodies especially local authorities and economic development. IH</p>	Ian Hay (EGCP)
<p><b>Recommendation</b> RMP needs to objectively demonstrate that the marine economy, especially the on-land/coastal elements make a positive, social contribution in terms of things like facilities management for contributions to cutting carbon emissions, maintaining good air quality through management of on-site green space, energy efficiency, reducing marine litter etc.</p>	<p><b>Recommendation</b> RMP needs to openly and honestly demonstrate what the marine economy is actually doing to make a real contribution to <b>ENSURING A STRONG, HEALTHY AND JUST SOCIETY</b>, both on land and at sea. Repeating a policy like a mantra is just not enough - we need clear evidence that it is working.</p>	<p><b>Recommendation</b> RMP needs to openly and honestly provide objective evidence of how the marine economy really does live within environmental limits. Simply saying it happens or will happen is not good enough.</p>	<p><b>Recommendation</b> RMP needs an open and transparent method of putting objectives in its own plan and encouraging others whose plans deals with elements of the marine/coastal environment to be equally open and honest in their plan development/production, which would also help the much better integration of the plethora of plans which govern our lives.</p>	Ewen Cameron Private Individual.



**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN1 GENERAL PLANNING PRINCIPLE**

**Developer contributions for coastal infrastructure and/or mitigation**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
<p>Schemes to invest funding from local development to aid the coast do not exist in the same way that they do in the terrestrial system.</p> <p>However, monies from the crown estates marine assets are distributed through local councils via the Coastal Communities Fund. How this is spent depends on the area. Both Aberdeen City and Aberdeenshire are making this money available through a grant scheme.</p> <p>Local recipients in the first year include the Ythan Community trust to help improve visitor facilities and visitor management at Newburgh and Aberdeenshire Council to develop walking routes.</p>	<p>Schemes to invest funding from local development to aid the coast do not exist in the same way that they do in the terrestrial system.</p> <p>However, monies from the crown estates marine assists are distributed through local councils via the Coastal Communities Fund. How this is spent depends on the area. Both Aberdeen City and Aberdeenshire are making this money available through a grant scheme.</p> <p>Local recipients in the first year include work to improve disabled access to the coast and visitor information.</p>	<p>Schemes to invest funding from local development to aid the coast do not exist in the same way that they do in the terrestrial system.</p> <p>However, monies from the crown estates marine assists are distributed through local councils via the (get proper name). How this is spent depends on the area. Both Aberdeen City and Aberdeenshire are making this money available through a grant scheme.</p> <p>Local recipients in the first year include The EGCP Turning the Plastic Tide project and NatureScott</p> <p>Mitigation of impacts elsewhere in area e.g. net gain (link).</p>		Ian Hay EGCP
			Developer Contributions have to demonstrate that they are needed to allow the development to proceed, and this is a test that it is unlikely that marine activities will be able to pass.	Policy Team, PES, Aberdeenshire Council
<p><b>Recommendation</b> That the RMP does not neglect work done by EGCP in relation to project developments and gaining funding for delivery</p>	<p><b>Recommendation</b> That the RMP does not neglect work done by EGCP in relation to project developments and gaining funding for delivery</p>	<p><b>Recommendation</b> That the RMP does not neglect work done by EGCP in relation to project developments and gaining funding for delivery</p>		Ian Hay EGCP
<p><b>Recommendation</b> I fully endorse and support the recommendations made on this point by Ian Hay of the East Grampian Coastal Partnership Partnership</p>				Ewen Cameron Private Individual.



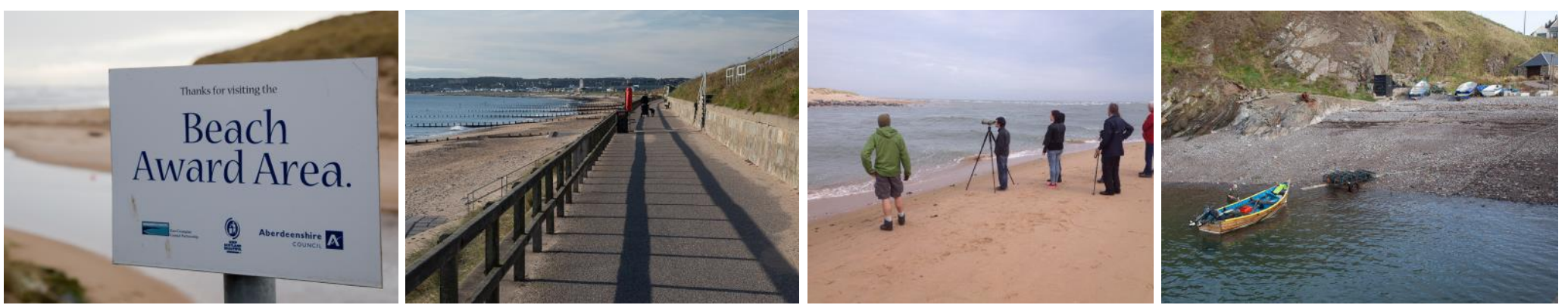


**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN1 GENERAL PLANNING PRINCIPLE**

**RMP should consider determining sectoral incompatibilities and potential for co-existence of development and activity using appropriate mechanisms such as interactions matrices.**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
<p>In 2011 EGCP undertook a comprehensive Sectoral Interactions Matrix detailing the relationships between individual sectors.</p>	<p>The Sectoral Interactions Matrix highlighted opportunities regarding coastal access and lack of facilities for small boat users. However, this must be set against other sectors and there have been significant conflicts between small personal watercraft and wildlife in the area.</p>	<p>In order to assess this EGCP has teamed up with the Moray Firth Partnership, The Tay Estuary Forum and the Forth Estuary Forum to develop the SEACORP project which will work to deliver a comprehensive State of the Coast Report.</p>	<p>EGCP is working to promote good governance through project such and the Sectoral Interactions Matrix and SeaCORP. This will also consider the data available on NMPi and the work of Marine Scotland Science, JNCC, NatureScot etc</p>	<p>Ian Hay EGCP</p>
<p>Integrated Land Use has been well recognised in both concept and practice in Scotland for some considerable time. As another "shared resource", it is essential that the use of our shared marine environment is utilised in a similarly equitable way - not least for the sake of future generations, who are entitled to have a health and productive marine environment open to them too.</p>	<p>As in so many aspects of life the principle of FAIRNESS is often given no more than lip service with the majority of the benefits going to those with money and influence.</p>	<p>In the utilisation of the marine environment, it is often the views of those with a vested interest that are the loudest voices which are given most weight i.e. in terms of sustainable catch levels, impact of fishing techniques etc.</p>		<p>Ewen Cameron. Private individual.</p>
<p><b>Recommendation</b> Once updated this could be combined with spatial data in NMPi to highlight the key areas that need to be managed in the RMP area.</p>	<p><b>Recommendation</b> Once updated this could be combined with spatial data in NMPi to highlight the key areas that need to be managed in the RMP area.</p>	<p><b>Recommendation</b> Using the information from the SeaCORP project the RMP can develop a Strategic Assessment to inform the planning process</p>	<p><b>Recommendation</b> That the RMP ensures it has the appropriate level of data and understanding to discharge its duties.</p>	<p>Ian Hay EGCP</p>
<p><b>Recommendation</b> RMP should include, promote and monitor Integrated Marine Use as a fundamental principle applied <u>in an evidence based and demonstrable</u> way to all current and future marine activity. It cannot be left to the individual marine sectors to do it themselves.</p>	<p><b>Recommendation</b> as suggested elsewhere, RMP should include a mechanism for regular independent and evidence based review and evaluation that the worthy objectives of FAIRNESS etc. are actually being achieved and RMP should require require regulatory intervention when they are not.</p>	<p><b>Recommendation</b> as suggested elsewhere, RMP should include a mechanism for regular independent and evidence based review and evaluation that marine activities really are operating within ENVIRONMENTAL LIMITS and require regulatory intervention when they are not.</p>	<p><b>Recommendation</b> for the reasons given above, the RMP should require government to provide regular independent and evidence based review and evaluation that marine activities really are achieving the standards and objects listed throughout the plan and require regulatory intervention when they are not.</p>	<p>Ewen Cameron Private Individual.</p>



**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN1 GENERAL PLANNING PRINCIPLE**

RMP should consider identifying areas for preferential use by specific sectors, where appropriate, following consultation and using appropriate mechanisms such as sustainability appraisal and scenario mapping.

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
In general, spatial decisions are being made in a case by case basis. This reduces confidence for developers and can lead to large amounts of resources being used to research an unsuitable site.		The Southern Trench has recently been designated a Marine Protected Area. This may lead to additional management measures		Ian Hay EGCP
		The principle of "Protected Area" in the terrestrial environment has had limited benefit and much of the decades long losses leading to the current biodiversity crisis can be attributed to habitat fragmentation. The concept and principle of <b>Biodiversity Net Gain</b> (effectively better management/development standards everywhere) is being recognised as important, effective and more routinely applied to terrestrial development. There is no reason why a similar principle could not be applied in the marine environment in relation to all marine activity. Again, this is especially important if future generations are to have a marine environment from which they can benefit too.		Ewen Cameron Private Individual..
<b>Recommendation</b> This will be decided at an appropriate time by the RMP.	<b>Recommendation</b> This will be decided at an appropriate time by the RMP.	<b>Recommendation</b> This will be decided at an appropriate time by the RMP. However, the RMP must maintain strong links to the Southern Trench MPA.	<b>Recommendation</b> This will be decided at an appropriate time by the RMP.	Ian Hay EGCP
		<b>Recommendation</b> while acknowledging the importance and value of protected areas in the marine environment to provide safe and secure breeding areas and the like, the RMP should adopt and promote the concept and principle of <b>Biodiversity Net Gain</b> being applied to all activities in the marine environment, if necessary via a short period of <b>No Net Biodiversity Loss</b> .		Ewen Cameron Private Individual.

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN1 GENERAL PLANNING PRINCIPLE**

RMP should consider taking account of cross-sectoral agreements with regards to shared usage of the marine area.

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
<b>Recommendation</b> This will be decided at an appropriate time by the RMP.	<b>Recommendation</b> his will be decided at an appropriate time by the RMP.	<b>Recommendation</b> This will be decided at an appropriate time by the RMP.	<b>Recommendation</b> This will be decided at an appropriate time by the RMP.	Ian Hay EGCP



**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN5 CLIMATE CHANGE - MITIGATION**

**Offshore Oil and Gas**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
There are already many medium scale wind turbine developments. Need to ensure more renewable energy is produced and used in the North Sea Region.	Currently ensuring a Just Transition in the oil & gas sector in line with the findings of the Just Transition Commission and Just Transition Commission Advice for a Green Recovery (July 2020). As a result of COVID we are maintaining and creating new jobs for oil & gas workers and aligning skills development for young and old with the net zero transition.	Currently moving towards renewable energy, including biomass, CCS, green & blue hydrogen and offshore wind. Need to consider the pros and cons of modern techniques and renewable energy e.g. decommissioning of wind farms.	Aberdeenshire Council (March 2020) Climate Change Declaration	Tara Murray Aberdeenshire Council Climate Change
	Ensuring a Just Transition in line with the findings of the Just Transition Commission		Transition to Net Zero City (Aberdeen). Vision document and Strategic Infrastructure Plan approved May 2020 and governance approved June 2020	Alison Leslie. Aberdeen City Council Sustainability
	Invest in education & training to repurpose and transition O&G expertise into renewable energy and carbon capture			Derek McDonald Aberdeenshire Council Economic Development
			Peterhead is identified as a key location for National development site for Carbon Capture and Storage, a possible landfall for a potential international North Sea interconnector, onshore connections to support offshore renewable energy, and major energy developments as set out in National Planning Framework 3	Policy Team, PES, Aberdeenshire Council
Reduction in offshore oil and gas and the resulting impacts on the considerable amount of employment within the area related to their production, transportation, and processing It should however be noted that this can be offset if a region becomes a global hub of expertise. This can be achieved through good planning and working to ensure that key expertise wishes to remain in each location.	The effect of oil and gas can have a polarising effect on society with high levels of inequality. This can be reduced by promoting other sectors and diversification. Another issue relating to this is with hobby fishermen. I.e., people who have small scale fishing operations that they work when onshore, these are subsidised by earnings made in the oil and gas industry allowing them to undercut full time fishermen. Conversely some fishermen gain employment through crew transfer and guarding cables etc helping the local fishing industry. IH	While the oil and gas industry have an excellent record of working to reduce its use of carbon in its production their will need to be fundamental changes to reduce the impact of the products of the industry.	EGCP has director representation linked to the Oil and Gas industry. It also works closely with Oil and Gas UK and various companies.	Ian Hay EGCP
<b>Recommendation</b> That the RMP supports the diversification of the area's economy to other sectors and as a hub for global expertise.	<b>Recommendation</b> That the RMP supports the diversification of the area's economy to other sectors and as a hub for global expertise.	<b>Recommendation</b> The RMP should place high importance supporting the development of low carbon energy technologies whilst seeking to mitigate against damage to wildlife and seascape.	<b>Recommendation</b> The RMP will need to develop influence as decision maker rather than just working with the Oil and Gas sector on specific projects.	Ian Hay EGCP



**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN5 CLIMATE CHANGE - MITIGATION**

**Carbon Emissions**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
	Currently removing social and economic barriers to active and sustainable travel to help improve health and reduce emissions.	Need a move to clean shipping, climate neutral and inclusive transport: reduce the carbon footprint of transport and provide a well-functioning transport service affordable to all groups.	Aberdeenshire Council Environmental and Climate Change Policy (2017)  Aberdeenshire Council's (March 2020) Climate Change Declaration  Aberdeenshire Council Carbon Budget (2017)  Aberdeenshire Local Transport Strategy (2012)  Member oversight to ensure compliance is through the Aberdeenshire Council Sustainability Committee	Tara Murray Aberdeenshire Council Climate Change
Enhance onshore mains power hook-up capacity for berthed vessels (incl hybrid powered). And Hydrogen? Create infrastructure for inward CO2 handling destined for CCS (eg Acorn)		Enhanced microplastic capture from wastewater prior to discharge from industry and consumers (incl. car tyres)		Derek McDonald Aberdeenshire Council Economic Development
Enhance on-shore mains power hook-up capacity for berthed vessels (including hybrid powered and hydrogen). Create infrastructure for inward CO2 handling destined for CCS (e.g. Acorn) and for infrastructure for potential hydrogen for export.				Louise Napier Aberdeen City Council City Growth
		There is an urgent need to move to clean shipping fuel. The argument that alternatives are too costly and will increase prices simply demonstrates that we are NOT living within ENVIRONMENTAL LIMITS AND THE OBJECTIVE is no more than an eye-catching slogan and marine shipping is simply going to continue to ignore the real/full costs of using current fuels and pass the payment of those costs on to future generations.		Ewen Cameron Private Individual.
		Emissions from marine transport. Transport Scotland indicates emissions from marine transport are estimated to be 1.4 MtCO2e, or 11% of total Scottish transport emissions	Transition to Net Zero City (Aberdeen). Vision document and Strategic Infrastructure Plan approved May 2020 and governance approved June 2020 Renewable energy solutions developed/ planned – offshore wind, hydrogen economy.	Alison Leslie. Aberdeen City Council Sustainability
Increase in vessel traffic including Shipping and marine tourism through projects such as Nigg harbour expansion and resulting increase in terrestrial developments/ infrastructure needed to support this.				LBAP
Producing offshore renewable energy is taking place with three wind power sites in operation.  In addition, the Acorn Carbon Capture Storage scheme has received some funding from the Scottish Government and has a strong case to receive some of the £1bl of funding highlighted for such a scheme in the 20/21 UK budget.  Options such as cold ironing for ships have been discussed but are not currently viable.  Work should be done to ensure that vessels are as efficient as possible to reduce fuel costs as well as carbon emissions.	Carbon emissions from road and air transport need to be reduced sharply and sea transport is likely to have a role to play.  Work on developing sky sails seems to have stalled. The large kite like devices help reduce the use of fuel in shipping.	The area has seen significant increase in sea temperature resulting in changes to the species using the area. For example, Bottlenose dolphin have expanded out of the Moray Firth, whilst we have largely lost the once common, white beaked dolphin.	EGCP is playing an active role in Climate Ready Aberdeenshire.	Ian Hay EGCP
<b>Recommendation</b> That the RMP works to support the development of low carbon technology and carbon capture and storage.	<b>Recommendation</b> That the RMP recognise the need for low carbon technologies and carbon capture and storage.	<b>Recommendation</b> That the RMP works to aid in the delivery of carbon reductions.	<b>Recommendation</b> That the RMP continue close working with groups and initiatives that deliver work to reduce and mitigate climate change.	Ian Hay EGCP
		<b>Recommendation</b> RMP should take a lead in arguing for and promoting the development of cleaner shipping fuels. In the same way that the values and benefits of renewable energy were, and in some sectors still are, regarded with contempt, RMP needs to champion the drive for cleaner fuels as a means of delivering all the objectives listed above.		Ewen Cameron Private Individual.

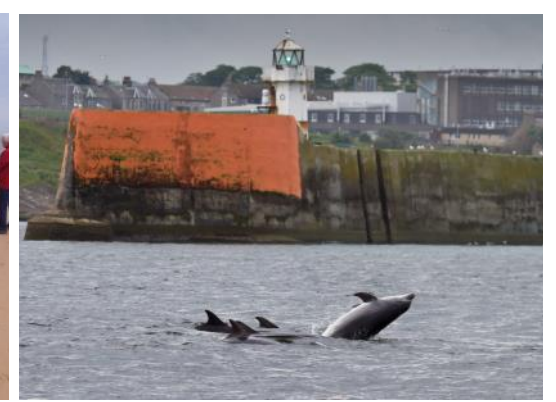


**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN5 CLIMATE CHANGE - MITIGATION**

ADAPTATION

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
Already assessing the economic, environmental, and societal risks of climate change, putting measures in place to adapt to these and building resistance in coastal towns and areas throughout Aberdeenshire. Impacts include rising sea levels, flooding, intensity of storms and coastal erosion and landslides.	A just transition must include climate change adaptation and resilience. Climate Ready Aberdeenshire has ensured this is included within its objectives.	Coastal key pressures include increased intensity of storms and rising sea levels.	Climate Ready Aberdeenshire (2019): a 10-year cross-sector initiative to develop a vision, strategy, and action plan for Aberdeenshire to mitigate climate change and adapt to its impact.	Tara Murray Aberdeenshire Council Climate Change
	Enhance education & career pathways to enable young people to create & implement solutions		Stop exporting UK generated problems overseas!	Derek McDonald Aberdeenshire Council Economic Development
		In the inland terrestrial environment there has been a radical and at times fundamental changes in attitudes to river engineering flood management - although there are probably still too many new floodplain developments taking place and certainly many existing ones that are going to see increase frequency and severity - i.e. Storm Frank of 2015. In the coastal environment the debate on increased flood risk appears to be much less public and informed. There is still a common perception that coast flooding and sea level rise is some sort of far distant possibility and will anyway easily be remedied by built defences. The future for the residents of Fishbourne in Wales appear to be much more immediate and should not be left to the news media for discussion. The RMP should play an honest part too.		Ewen Cameron Private Individual.
		Increased frequency of extreme weather events [		Alex Stuart LBAP
Changes in species distribution. Northward movement of some marine cold water species	Rise in sea level, storm surge conditions and erosion reduce accessibility. Public safety issues	Pressures will also come from a rise in sea level (UKCP18) – resulting in coastal inundation, coastal erosion, wave overtopping especially during storm surge conditions Impact on coastal habitats Natural/ dynamic movement of sediment	Aberdeen Adapts: Climate Adaptation Framework in place. Includes "Investigate opportunities to incorporate measures such as, beach nourishment and dune restoration into plans to protect the city shoreline." – and the action area: "Support the development of natural coastal defences, to improve the resilience of vulnerable soft coastal areas to flooding and erosion."	Alison Leslie. Aberdeen City Council Sustainability
Increasing storminess is already being seen in the area. For example, on the 15 <sup>th</sup> of December 2012 a major storm destroyed boats and buildings along the coast with Peterhead and Stonehaven being badly affected.  In 2015 Storm Frank also caused a great deal of damage to the area although much of the worst damage happened inland.  Stonehaven has suffered greatly due to flooding and major works are under way to reduce this in the future.  While none of these events can be directly attributed to climate change increased energy in the atmosphere has been shown to increase extreme weather events.	Working to protect people from the effects of climate change will benefit all the population	Coastal Squeeze, where hard coastal defences combine with rising sea level to reduce the amount of coastal habitat, is a threat to wildlife in some areas but only to a limited degree in the North East.	EGCP is playing an active role in Climate Ready Aberdeenshire.	Ian Hay (EGCP)
<b>Recommendation That the RMP supports efforts to protect communities and businesses from the impacts of climate change in a way that reduces impacts on habitat.</b>	<b>Recommendation That the RMP supports efforts to protect communities and businesses from the impacts of climate change in a way that reduces impacts on habitat.</b>	<b>Recommendation That the RMP works to reduce coastal squeeze while protecting communities.</b>	<b>Recommendation That the RMP continue close working with groups and initiatives that deliver work to reduce and mitigate climate change.</b>	Ian Hay (EGCP)
		<b>Recommendation RMP needs to take an open, honest and upfront lead on pressing for much more informed and evidence based public dialogue on the realities of coastal flooding, storm frequency and sea level change along the East Coast of Scotland.</b>		Ewen Cameron Private Individual.



**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN5 CLIMATE CHANGE - MITIGATION**

The RMP should take consideration of the River Dee RBMP

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
Success of fishers is linked to spawning grounds. Protection of the River Dee will lead to a more successful fisheries sector.	Protection of the natural environment has benefits to all society.		Links between those organisations with River Dee RBMP.	SEPA, NatureScot, Aberdeenshire Council, Aberdeen City Council

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN5 CLIMATE CHANGE - MITIGATION**

**Shoreline Management Plans (SMPs)**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
Protect homes, businesses, and transport links (where economically & environmentally feasible?)				Derek McDonald Aberdeenshire Council Economic Development
Protect homes, businesses and transport links		Scotland's Dynamic Coastal map and the assessment of coastal protection under the North East Flood Risk Management Plan have identified areas along the shoreline potentially vulnerable to future flooding and erosion.	Aberdeen Adapts Climate Adaptation Framework includes – "Develop a shoreline management plan, building on existing studies, to protect people, places, nature and heritage at the coast."	Tara Murray
		As mentioned above, over recent decades the approach to river engineering, river flooding and so on have undergone a radical change and continue to do so, especially with the recognition that "traditional hard engineering" is costly, often failed and did so with even greater social and economic costs and consequences that some flood events themselves. This change of approach has been taken by flood prevention authorities, River Fisheries Boards/Trusts and many others with the emphasis shifting to "working with natural processes".		Ewen Cameron Private Individual.
<b>Recommendation</b> The RMP should play a full part in supporting the development of Shoreline Management Plans	<b>Recommendation</b> The RMP should play a full part in supporting the development of Shoreline Management Plans	<b>Recommendation</b> The RMP should play a full part in supporting the development of Shoreline Management Plans	<b>Recommendation</b> The RMP should play a full part in supporting the development of Shoreline Management Plans	Ian Hay (EGCP)
		<b>Recommendation - While there is undoubtedly a place for hard engineering protection, RMP needs to take an open, honest and upfront lead on pressing for much more informed and evidence based public rationale in SMPs on what is actually possible/feasible as well as identifying the known or likely impacts on all aspects of our lives - including identifying when/where retreat from the coast may be the only option.</b>		Ewen Cameron Private Individual.



**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN5 CLIMATE CHANGE - MITIGATION**

**Species Range Shifts**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
<p>More science required to better understand dynamic marine seafood chain. Potential impacts on existing fisheries but opportunities to develop new fisheries.</p>	<p>Promote consumption of locally landed &amp; diverse range of seafood species to Scottish to enhance diet, shorten and better connect seafood supply chain for benefit of all. New species for recreational fishing;</p>		<p>More science required to better understand dynamic marine seafood chain. Potential impacts on existing fisheries but opportunities to develop new fisheries.</p>	<p>Derek McDonald Aberdeenshire Council Economic Development</p>
		<p>Potential increase in invasive species and/or diseases/ pathogens related to arrival of new species which would threaten existing species/ ecosystems [AS]</p>		<p>Alex Stuart NESLBAP</p>
<p>Northward movement of some cold water species.</p>		<p>Northward movement of some cold water species.</p>		
<p>Potential impacts on existing fisheries but opportunities to develop new fisheries.</p>	<p>A good example of species range shift is the Bottlenose Dolphin. Prior to the mid-1990s they were confined to the comparatively warm water of the Moray Firth. However, the increase in sea temperatures has allowed them to increase their range to the east coast including Aberdeen.</p> <p>New species for recreational fishing such as seabass. Loss of existing species IH</p>	<p>Scotland's Marine Atlas: Information for The National Marine Plan - gov.scot (www.gov.scot)</p>		<p>Ian Hay EGCP</p>
<p><b>Recommendation</b> EGCP should work closely with the Inshore fisheries groups to support them in any changes that are needed to cope with species range shift.</p> <p>The RMP should also be engaged in work to identify and remove invasive species that could have a major economic impact</p>	<p><b>Recommendation</b> The RMP will research and work with other groups to reduce and mitigate against harm caused by climate change</p>	<p><b>Recommendation</b> The RMP should engaged in work to identify and remove invasive species that could have a major economic and biodiversity impact in the area</p>	<p><b>Recommendation</b> The RMP should work closely with the NESLBAP and The Inshore fisheries groups</p>	<p>Ian Hay EGCP</p>
<p><b>Recommendation</b> I fully endorse and support the recommendations made on this point by Ian Hay of the East Grampian Coastal Partnership and Alex Stuart of the North East Scotland Local Biodiversity Partnership.</p>				<p>Ewen Cameron Private Individual.</p>

Compiled by EGCP LTD. Views are those of the contributors and do not necessarily EGCP LTD— June 2021

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**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN5 CLIMATE CHANGE - MITIGATION**

**Farming / land management adaptation**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
Impact of increased rainfall could flood farms and damage crops. Increased temperatures could lead to longer growing seasons. Conversely, dryer summers could deplete groundwater and river flow, affecting already vulnerable salmon stocks	Smarter use of flood plains and (more) afforestation, incl riparian to better balance agriculture and water course management, to reduce costly and damaging downstream flooding events			Derek McDonald Aberdeenshire Council Economic Development
		Potentially deleterious runoff to environmentally sensitive coastal areas. Dryer summers could concentrate downstream pollution levels, especially in firths and estuaries		
Impact of increased rainfall could flood farms and damage crops. Increased temperatures could lead to longer growing seasons. More storm events could lead to erosion that reduces soil fertility and damages spawning redds used by salmon. Salmon fishing is a significant driver for employment and enterprise in some areas	Good catchment management is key to having clean bathing waters that can be used for water sports.	Potentially deleterious runoff to environmentally sensitive coastal areas.  This also leads to increased bacterial load in the coastal waters giving rise to unsafe conditions for bathers and failing of water quality standards.  Of the seven designated bathing beaches in the area all but one consistently meets either good or excellent bathing water quality. Fraserburgh Tigerhill meets the sufficient standard.	EGCP is a member of the	Ian Hay EGCP
	<b>Recommendation</b> The RMP should work with others to encourage increases in riparian woodland and good livestock farming practices that keep farm animals away from rivers and tributaries. IH	<b>Recommendation</b> The RMP should also work with catchment management groups to promote low phosphorus cleaning products as a huge amount of energy is used removing them from effluent.	<b>Recommendation</b> The RMP should have close links with groups working to improve catchments and land management.	Ian Hay EGCP
	<b>Recommendation</b> I fully endorse and support the recommendations made on this point by Ian Hay of the East Grampian Coastal Partnership Partnership and especially so in his comments on the impacts of agricultural runoff onto more sensitive coastal areas. Like many coastal areas, the Aberdeenshire coast lost less of its biodiversity than more inland areas where impacts from agriculture have been more direct, destructive and prolonged.			Ewen Cameron Private Individual.

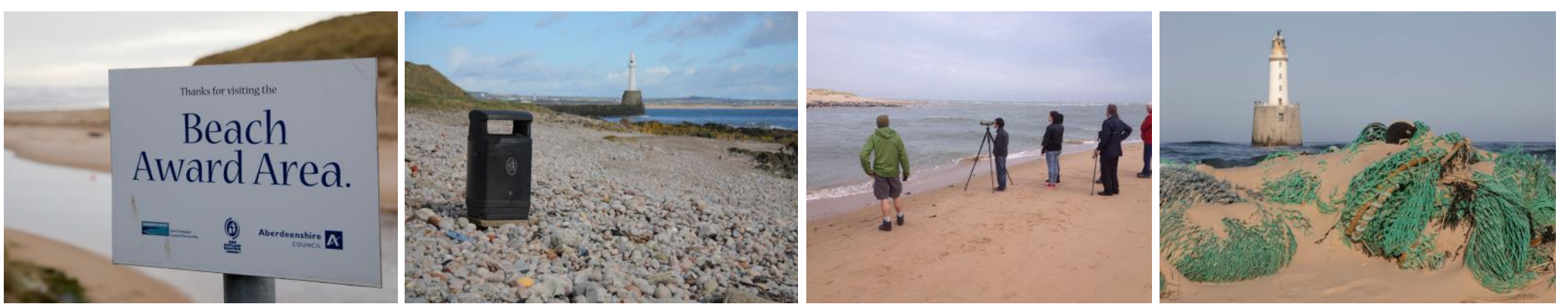
**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN5 CLIMATE CHANGE - MITIGATION**

**RMP should consider Identifying significant natural carbon sinks and seek to avoid colocation with potentially damaging activity.**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
		Use of nature-based solutions such as creating and restoring sea grass beds will help with carbon sequestration and provide multiple ecosystem and biodiversity benefits such as increased diversity of fish and invertebrate species		Ian Hay (EGCP)
SG forestry policy is exemplary and recognises benefits of increased planting to sequester carbon. Strong emphasis on commercial species will create high quality timber which can displace more energy-intensive concrete, steel etc in construction (75% of new build homes in Scotland are timber-framed)	New multi-purpose forests + public access = more forest walk & cycling opportunities, benefitting public health and wellbeing	Need to move faster to achieve carbon-neutral agriculture via more closely integrated land management and digitally enabled sustainable intensification	Public money for public goods; market returns for market goods.	Derek McDonald Aberdeenshire Council Economic Development
		In the terrestrial environment the value of peatlands as carbon sinks has grown leading to improvements in their protection and significant action to restore those damaged by drainage, abstraction for fuel etc. The contribution the marine environment makes to carbon storage is much greater.		Ewen Cameron Private Individual.
<b>Recommendation</b> The RMP should look for opportunities to protect and enhance natural carbon sinks	<b>Recommendation</b> The RMP should look for opportunities to protect and enhance natural carbon sinks	<b>Recommendation</b> The RMP should look for opportunities to protect and enhance natural carbon sinks	<b>Recommendation</b> The RMP should look for opportunities to protect and enhance natural carbon sinks	Ian Hay (EGCP)
		<b>Recommendation</b> RMP needs to take an open, honest and upfront lead on pressing for a much more informed and evidence based public explanation of the need for this sort of remedial action.		Ewen Cameron Private Individual.



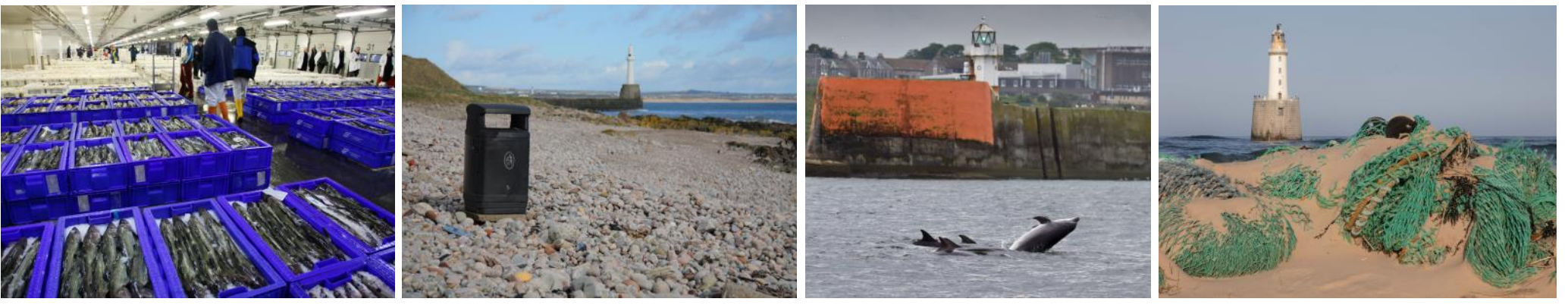


**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN5 CLIMATE CHANGE - MITIGATION**

**RMP should consider assessing the acceptability of any proposed partial loss or damage to natural carbon sinks (including any compensatory measures) through licensing or management of marine activities, balanced with priorities presented in the NMP and respective regional marine plans.**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
Need more information		Protection of blue carbon will be important – carbon storage in marine seabeds/ sediments.	Protection of blue carbon will be important – carbon storage in marine seabeds/ sediments.	Alison Leslie. Aberdeen City Council Sustainability
		Many environmental restoration or mitigation measures are rejected on the grounds that they will be too expensive or drive up costs/prices too much. Yes, the costs will be high but that is an inevitable consequence of having ignored problems like this for so long - in reality ignoring the longer term costs and we have been happy to pass them on to future generations. As a society, for the last 70+ years we have been using "environmental credit cards" across a range of activities and we have not even been making the minimum monthly repayments. Inevitably and unavoidably, the "bill" just keeps on getting bigger as a consequence.		Ewen Cameron Private Individual.
<u>Blue Carbon   Scottish Parliament</u>  Recommend that the value of marine habitat as blue carbon is included and properly considered. The benefit of restoration of coastal and marine habitats as climate change mitigation to increase storage of blue carbon should be included in RMP.				Emma Williams – Aberdeenshire Council
<b>Recommendation</b> The RMP should work with Marine Scotland's Licencing Team to assess the acceptability of any proposed partial loss or damage to natural carbon sinks.	<b>Recommendation</b> The RMP should work with Marine Scotland's Licencing Team to assess the acceptability of any proposed partial loss or damage to natural carbon sinks.	<b>Recommendation</b> The RMP should work with Marine Scotland's Licencing Team to assess the acceptability of any proposed partial loss or damage to natural carbon sinks.	<b>Recommendation</b> That the RMP works with other groups such as Marine Scotland, Local Authorities, and the Local Biodiversity action plan to assess such applications.	Ian Hay EGCP
		<b>Recommendation</b> RMP needs to take an open, honest and upfront lead on pressing for a much more informed and evidence based public explanation of the need for this sort of remedial action.		Ewen Cameron Private Individual.



**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN5 CLIMATE CHANGE - MITIGATION**

RMP should consider explaining how they have taken into account future climate change in terms of climate change adaptation.

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
			Local Flood Risk Management Plan for the North East 2016 – 2022 UK Climate Projections 2009 (UKCP09) James Hutton Institute for UKCP18 data	Tara Murray Aberdeenshire Council Climate Change
		Coastal protection and management	North East Flood Risk Management Plan in place. Considers areas potentially vulnerable to coastal flooding.	Alison Leslie. Aberdeen City Council Sustainability
		As stated above - the implications and consequences of continuing to ignore climate change and especially the costs and burdens currently being "dumped" on future generations is unfair and unjust, not least because they have no say. That is simply not justifiable, especially in a plan aspiring to the objectives listed above.		Ewen Cameron Private Individual.
			<b>Recommendation</b> This should be completed at the appropriate time,	Ian Hay (EGCP)
		<b>Recommendation</b> RMP must take an open, honest and upfront lead on pressing for a much more informed and evidence based public explanation of the need for this sort of remedial action as well as a proactive stance against the subjective objections of those with a vested interest in maintaining the status quo.		Ewen Cameron Private Individual.

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN6 HISTORIC ENVIRONMENT**

Vulnerability of scheduled monuments and historic harbours to climate change.

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
Inshore fleet's high dependence on historic and vulnerable infrastructure, particularly sea walls and harbours – very expensive to maintain and for which ROI can be hard to justify	Small harbours important for healthy inshore leisure activity			Derek McDonald Aberdeenshire Council Economic Development
			City/ shire archaeologist has done a study on Aberdeen's coastal heritage potentially vulnerable to climate change	Alison Leslie. Aberdeen City Council Sustainability
While many of the area's coastal historic sites are in cliff top locations, places of interest such as Footdee, Stonehaven and some of the smaller villages are susceptible to storm events linked to climate change. These sites have a strong tourism focus which could be affected through both damage due to weather events, but also by unsympathetic coastal defences. Managing this is the responsibility of the Local Authority.			EGCP has worked with the City and Shire archaeologists on a number of projects.	Ian Hay EGCP
<b>Recommendation</b> The RMP works closely with the City and Shire Archaeologists and Historic Environment Scotland.			<b>Recommendation</b> The RMP works closely with the City and Shire Archaeologists and Historic Environment Scotland.	Ian Hay EGCP

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN6 HISTORIC ENVIRONMENT**

Vulnerability of scheduled monuments to climate change.

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
Inshore fleet's high dependence on historic and vulnerable infrastructure, particularly sea walls and harbours – very expensive to maintain and for which ROI can be hard to justify	Small harbours important for healthy inshore leisure activity			Derek McDonald Aberdeenshire Council Economic Development
			City/ shire archaeologist has done a study on Aberdeen's coastal heritage potentially vulnerable to climate change	Alison Leslie. Aberdeen City Council Sustainability
While many of the area's coastal historic sites are in cliff top locations, places of interest such as Footdee, Stonehaven and some of the smaller villages are susceptible to storm events linked to climate change. These sites have a strong tourism focus which could be affected through both damage due to weather events, but also by unsympathetic coastal defences. Managing this is the responsibility of the Local Authority.			EGCP has worked with the City and Shire archaeologists on a number of projects.	Ian Hay EGCP
<b>Recommendation</b> The RMP works closely with the City and Shire Archaeologists and Historic Environment Scotland.			<b>Recommendation</b> The RMP works closely with the City and Shire Archaeologists and Historic Environment Scotland.	Ian Hay EGCP

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN6 HISTORIC ENVIRONMENT**

Vulnerability of historic harbours to climate change.

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
The area's small harbours are facing many threats due to poor funding streams in relation to their importance to coastal communities. This is an area that EGCP has worked on before and could be repeated. Some harbours have seen considerable investments such as Port Errol.	Small harbours provide a key resource for recreation and are central to many communities, efforts should be made to protect and enhance them for future generations.		Many harbours in the region have a degree of statutory protection relating to their walls, breakwaters, etc. and although these issues are largely a matter for Local Authorities and for Historic Environment Scotland, a plan can assist by providing a framework for co-ordination and by ensuring that existing priorities are consistent with regional aspirations	Ian Hay EGCP
<b>Recommendation</b> That the RMP revisits the work carried out by EGCP and delivers a stocktake of the regions small harbours including condition, decision making structure and viability. This will inform further decisions.			<b>Recommendation</b> That the RMP works with Aberdeenshire Council and small harbour trusts to ensure the future viability of the areas small harbours.	Ian Hay EGCP



**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN7 LANDSCAPE/SEASCAPE**

Visual impacts of new coastal developments e.g. windfarms

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
			Visual impact will be accounted for in the marine licensing system.	Jim Mackie (Marine Scotland Licencing team) (JM)
The area currently has three marine wind power installation which bring energy and create jobs in the area. Within the current licensing processes the visual impact has been considered.	A seascape assessment for the area was carried out in 2005 and was included in Scottish Natural Heritage Commissioned Report No. 103 (ROAME No. F03AA06)		Work to assess the visual impact of new facilities is developed as part of the planning process for all new developments. EGCP has responded to consultations on new developments and will continue to do so	Ian Hay EGCP
<b>Recommendation</b> That a seascape assessment is developed to identify the most suitable locations for future developments. In general terms t			<b>Recommendation</b> That the RMP develops a Seascape assessment for the area	Ian Hay EGCP

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN7 LANDSCAPE/SEASCAPE**

Vulnerability of historic environment assets to coastal erosion and climate change. This includes undesignated and designated (Scheduled Monuments and Listed Buildings) historic assets, upstanding remains (promontory forts, lighthouses, military defences etc) as well as below ground remains (buried Palaeolandscapes, middens, settlements etc)

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
			Awareness of the value of undesignated as well as designated historic assets.	Claire Herbert Aberdeenshire Council Archaeology

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN7 LANDSCAPE/SEASCAPE**

Vulnerability of historic harbours to coastal erosion and climate change (designated and undesignated).

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
The area currently has three marine wind power installation which bring energy and create jobs in the area. Within the current licensing processes the visual impact has been considered.	A seascape assessment for the area was carried out in 2005 and was included in Scottish Natural Heritage Commissioned Report No. 103 (ROAME No. F03AA06)		Work to assess the visual impact of new facilities is developed as part of the planning process for all new developments. EGCP has responded to consultations on new developments and will continue to do so	Ian Hay EGCP
<b>Recommendation</b> That a seascape assessment is developed to identify the most suitable locations for future developments. In general terms t			<b>Recommendation</b> That the RMP develops a Seascape assessment for the area	Ian Hay EGCP

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN7 LANDSCAPE/SEASCAPE**

Vulnerability of historic assets to offshore development – wreck sites, (historic) aircraft crash sites, buried palaeolandscapes.

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
Potential – opportunities to promote the breadth and variety of historic environment sites present all along the coastline leading to improved understanding and improved wellbeing for locals and visitors.	Balancing promotion of historic environment with visitor pressure, so as to minimise any direct damage/ erosion to historic sites by visitors as well as impact on the wider surrounding environment	Archaeology Trail leaflet planned for Historic Harbours (intended to launch 2020, but postponed to 2021)		Claire Herbert Aberdeenshire Council Archaeology
<b>Recommendation</b> That the RMP takes into account historic assets when making decisions			<b>Recommendation</b> That the RMP carries out consultation with relevant authorities including the Aberdeenshire and Aberdeen City Archaeology departments, Historic Environment Scotland etc	Ian Hay EGCP



**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN5 CLIMATE CHANGE - MITIGATION**

**Generic Issues**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
The areas Landscape and seascape are both strongly included in the marketing for the area as a tourist destination both for local and visiting tourism via VisitAberdeen City and Shire and various other initiatives. Potential – opportunities to promote the breadth and variety of historic environment sites present all along the coastline leading to improved understanding and improved wellbeing for locals and visitors.	Balancing promotion of historic environment with visitor pressure, so as to minimise any direct damage/ erosion to historic sites by visitors as well as impact on the wider surrounding environment	Tourism is at an appropriate scale so that it does not affect the landscape/ seascape. The only major development to change the coastal landscape significantly is a Golfing development however this has not had a major impact visually. Archaeology Trail leaflet planned for Historic Harbours (intended to launch 2020, but postponed to 2021)		Ian Hay EGCP Claire Herbert Aberdeenshire Council

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN5 CLIMATE CHANGE - MITIGATION**

**Tourism Opportunities**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
The areas Landscape and seascape are both strongly included in the marketing for the area as a tourist destination both for local and visiting tourism via VisitAberdeen City and Shire and various other initiatives.		Tourism is at an appropriate scale so that it does not affect the landscape/ seascape. The only major development to change the coastal landscape significantly is a Golfing development however this has not had a major impact visually.		Ian Hay EGCP
The east coast of Scotland still has relatively rich coastal and marine wildlife, including assets like the Aberdeen Bay population of Bottlenose Dolphins. This makes Aberdeen probably the only city in the UK where both residents and visitors can readily see them on their own "marine doorstep". With many Internationally and Nationally important wildlife sites and Nature Reserves along its coast, these assets need to be properly valued, appreciated and protected				Ewen Cameron Private Individual.
			<b>Recommendation</b> That the RMP works with others including the local authorities to ensure that tourism developments are in keeping with the land/ seascape.	Ian Hay EGCP
<b>Recommendation</b> RMP must take an open and vigorous role in publicising the considerable wildlife assets of the East Coast, the risks they face from other marine and coastal activities and their value for tourism, as well as biodiversity itself.				Ewen Cameron Private Individual.

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN5 CLIMATE CHANGE - MITIGATION**

**Visual impacts of new coastal developments e.g. windfarms**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
			Visual impact will be accounted for in the marine licensing system.	Jim Mackie (Marine Scotland Licencing team) (JM)
			<b>Recommendation</b> That the RMP works with others including the local authorities to ensure that tourism developments are in keeping with the land/seascape.	Ian Hay EGCP



**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN8 COASTAL PROCESS & FLOODING**

**Coastal Defences / flood protection (Also see GEN5-ADAPTATION)**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
		Erosion of soft coastal areas Aberdeen Beach and north coastal area of the city	North East Flood Risk Management Plan in place. Considers areas potentially vulnerable to flooding.	Alison Leslie. Aberdeen City Council Sustainability
			<b>Recommendation That the RMP maintains close working with North East of Scotland Flood Risk Steering Group</b>	<b>Ian Hay EGCP</b>

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN8 COASTAL PROCESS & FLOODING**

**Local flood defence schemes Aberdeen Beach**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
	Impact of erosion on the seawall/ seawall foundations - public safety, accessibility and on coastal infrastructure.	Recharge of Aberdeen Beach took place in 2006. Beach nourishment and installation of nearshore rock breakwaters on a 600m stretch of the beach.	Aberdeen North Beach Coastal Defence Feasibility Report has been completed. Condition of coastal embankment and sea defences at North Beach. Determine solutions to embankment erosion and slope instability	Alison Leslie. Aberdeen City Council Sustainability

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN5 CLIMATE CHANGE - MITIGATION**

**RMP should consider aligning with terrestrial development plans and reflect coastal areas likely to be suitable for development, taking into account the most recent flood risk and flood hazard maps, and forthcoming coastal erosion vulnerability mapping.**

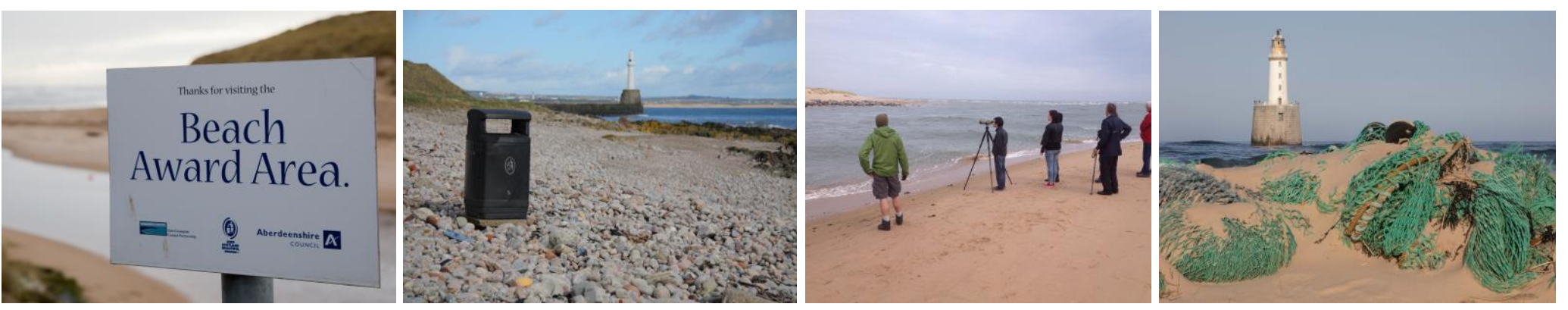
ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
		An emerging issue is the consequences of sea level rise on habitats such as saltmarsh.		SEPA flood management

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN5 CLIMATE CHANGE - MITIGATION**

**RMP should consider reflecting areas where managed realignment of coast may be appropriate, setting out the potential benefits such as habitat creation and new recreation opportunities.**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
			Current Due to the nature of the coast, there are few opportunities for this in the region. SEPA flood Management	SEPA flood management



**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN9: NATURAL HERITAGE**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
		Ecosystem services provided by the environment of the region include carbon sequestration, fish spawning areas, harvests of fish, seaweed and shellfish, various social services relating to health and visitors, and possibly coastal protection		LBAP Marine Group – Ian Hay
Even nationally important Natural Heritage Sites, such as Foveran Links Site of Special Scientific Interest, are still being lost to the promise of jobs and economic prosperity which often fails to materialise. While this continues, even the highest natural heritage designation, whether for species and/or habitats, is of limited value.		Good management and operational practice by <u>all</u> those working in marine/coastal environments should be the starting point and it must be unequivocally endorsed and promoted by the plan. Otherwise the objectives and policies are just "greenwash".		Ewen Cameron Private Individual.
<b>Recommendation</b> A plan such as this, with its highly aspiring objectives must take a much more proactive stance to advocate proper consideration and proactive protection of the high natural heritage values of the East of Scotland's coastal and marine environments. It must also vigorously assert the socio-economic values of our shared natural heritage in the face of the many nay-sayers who still argue short term jobs and financial gain for a few vested interests must always come first. This applies equally to all the above Objectives/ Policies.		<b>Recommendation</b> A plan such as this, with its highly aspiring objectives must take a much more proactive stance to advocate proper consideration and proactive protection of the high natural heritage values of the East of Scotland's coastal and marine environments. It must also vigorously assert the socio-economic values of our shared natural heritage in the face of the many nay-sayers who still argue short term jobs and financial gain for a few vested interests must always come first. This applies equally to all the above Objectives/ Policies and also for the sake of future generations.		<b>Ewen Cameron</b> <b>Private Individual.</b>

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN9: NATURAL HERITAGE**

**SITE PROTECTION: NATURA 2000 SITES**

**Generic Issues**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
		In the North East, dunes comprise around 22% of Scotland's total dune area, along with around 20% of Scotland's shingle habitat. These sites may also be at risk from sea level rise. Many sites already have statutory protection or are actively managed, however if plans continue to increase protected land areas across the UK, some of these areas may be identified as new potential sites.		Alex Stuart NESLBAP
		Note also coastal LNCS sites list has already been provided this network of coastal sites encompass a large proportion of the length of the Aberdeenshire coast. Securing positive management for these sites would be a key recommendation. <a href="#">Appendix12LocalNatureConservationSites-Part1.pdf (aberdeenshire.gov.uk)</a>		Emma Williams – Aberdeenshire Council
		<b>Recommendation</b> The RMP works with other organisations to protect and enhance designated sites		Ian Hay EGCP

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN9: NATURAL HERITAGE**

**SITE PROTECTION: NATURA 2000 SITES**

**Generic Issues**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
Cullen to Whitehills Tarlair to Gardenstown Gardenstown to Strahangles Point Aberdour Bay to Kinnaird Head Fraserburgh Bay (NB: approved by Council but still subject to outcome of ALDP consultation) Cairnbulg to St Combs Strathbeg to Rattray Rattray to Peterhead Cruden Bay Newburgh to Balmedie Blackdog to Bridge of Don (this site extends south to the City boundary but think they may have a LNCS that meets up with this) Findon Portlethen to Muchalls Coast Muchalls to Stonehaven Bay Downie Point to Todhead Todhead Point to Johnshaven Coast St Cyrus				Aberdeenshire Council Planning

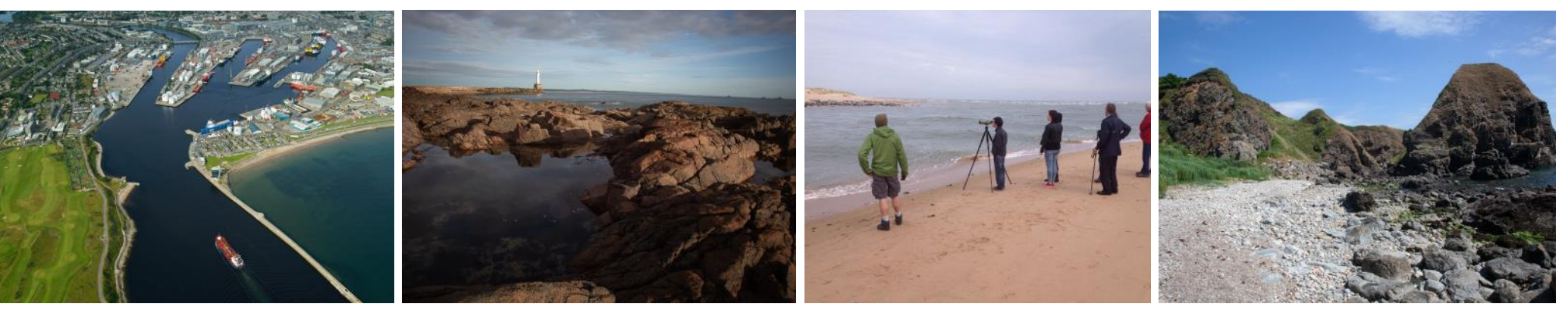
**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN9: NATURAL HERITAGE**

**SITE PROTECTION: NATURA 2000 SITES**

**Generic Issues**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
List of species Some (not exhaustive list) important species associated with coastal and marine habitats taken from <a href="https://www.nesbiodiversity.org.uk/wp-content/uploads/2019/10/MarineAndCoastalv1.pdf">https://www.nesbiodiversity.org.uk/wp-content/uploads/2019/10/MarineAndCoastalv1.pdf</a>  Humpback Whale Bottlenose Dolphin Harbour Porpoise Common Seal Grey Seal Puffin Gannet Eider Common Scoter Red-throated Diver Arctic Tern Ringed Plover Curlew Oyster Plant Kidney Vetch Bordered-brown Lacewing Narrow-mouthed Whorl Snail Northern Brown Argus Grayling Small Blue [AS]				Aberdeenshire Council Planning



**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN9: NATURAL HERITAGE**

**GEODIVERSITY**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
In 2008 EGCP published a report looking at the possibility of developing a Geopark to cover the area south of Aberdeen. This could be revisited to examine economic potential. In addition, Aberdeen has a strong link with the Oil and Gas industry with opportunities to inspire and gain business tourism.	Promoting interest and understanding in geology could be used to inspire young people in oil and gas. Also, this could be used to encourage walking with geology trails and geocaching. We can also use the highland boundary fault and the Pneumodesmus newmani fossil to gain interest.			Ian Hay (EGCP)
		Note that some LNCS sites are also designated for geodiversity (see above)		Emma Williams – Aberdeenshire Council
<b>Recommendation</b> That the RMP supports efforts to promote the areas rich Geodiversity	<b>Recommendation</b> That the RMP keeps the role of informing and engaging with the public about the area's geological history			<b>Ian Hay EGCP</b>

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN9: NATURAL HERITAGE**

RMP should consider using relevant guidance and data sources to identify, where appropriate, areas that are sensitive to specific types of development or other activity. Particular regard should be given to protected sites, protected species and Priority Marine

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
			Sensitive sites will be identified as part of the SeaCORPs project	Alex Stuart NESLBAP
			<b>Recommendation</b> That the RMP works with NatureScot and others to identify, where appropriate, areas that are sensitive to specific types of development or other activity. Particular regard should be given to protected sites, protected species and Priority Marine Features.	Ian Hay EGCP

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN9: NATURAL HERITAGE**

RMP should consider spatial policies taking account of the sensitivities identified.

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
			<b>Recommendation</b> To be considered by the RMP along with NatureScot	<b>Ian Hay EGCP</b>

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN9: NATURAL HERITAGE**

RMP should consider developing policies that contribute to the achievement of Conservation Objectives for designated sites within the MPA network.

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
<b>Recommendation</b> The RMP should consider schemes that recognised the added value that could be gained through sustainable fishing within the Southern Trench pMPA IH		<b>Recommendation</b> The RMP should play a full role in the management of the Southern Trench pMPA to ensure a balance between conservation and the environment IH	<b>Recommendation</b> The RMP should play a full role in the management of the Southern Trench pMPA to ensure a balance between conservation and the environment IH	<b>Ian Hay EGCP</b>

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN9: NATURAL HERITAGE**

RMP should consider recognising the role of habitats and species in providing and supporting ecosystem services and consider opportunities to enhance these services.

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
Widespread agreement (incl fishing industry) for implementation of MPA and other conservation objectives – on condition that all change to status/policy is undertaken in full consultation with stakeholders	All economic implications of change, offshore and onshore to be fully considered (eg pMPA S Trench consultation notes potential for adverse jobs impact on Fraserburgh Harbour)	EGCP should work with the proposed Southern Trench MPA (or provide such evidence it may have to inform the consultation process?)	Important for SG to meet its international obligations – but to deliver fairly and transparently, based on current and good quality evidence	Derek McDonald Aberdeenshire Council Economic Development
<b>Recommendation</b> The RMP should work with Marine Scotland Science to improve the ecosystem so that is as robust and productive as possible thus producing higher yields. This could consider systems such as no take zones and closed areas to increase overall productivity. This should take into account the presence of other features that result in no take zones such as windfarms, pipes and cables IH		<b>Recommendation</b> The RMP should work with Marine Scotland Science to ensure that the coastal waters are in good ecological condition IH	<b>Recommendation</b> The RMP should work with the Inshore Fisheries Groups to aid in initiatives that aid conservation and fisheries	<b>Ian Hay</b>



**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN10 INVASIVE NON-NATIVE SPECIES (INNS)**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
In 2008 EGCP published a report looking at the possibility of developing a Geopark to cover the area south of Aberdeen. This could be revisited to examine economic potential. In addition, Aberdeen has a strong link with the Oil and Gas industry with opportunities to inspire and gain business tourism.	Promoting interest and understanding in geology could be used to inspire young people in oil and gas. Also, this could be used to encourage walking with geology trails and geocaching. We can also use the highland boundary fault and the Pneumodesmus newmani fossil to gain interest.			Ian Hay (EGCP)
		Note that some LNCS sites are also designated for geodiversity (see above)		Emma Williams – Aberdeenshire Council
<b>Recommendation That the RMP supports efforts to promote the areas rich Geodiversity</b>	<b>Recommendation That the RMP keeps the role of informing and engaging with the public about the area's geological history</b>			<b>Ian Hay EGCP</b>

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN11 MARINE LITTER**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
Economic costs of clean ups.  Landfill tax: disposing of collected debris from beach cleans to landfill or for recycling is a limiting factor.  Incineration: Some Local Authorities are transitioning away from landfill towards incineration. This method of waste disposal is more selective and will not accept certain types of marine litter, especially mixed materials associated with the fishing industry (e.g. ghost nets and creel pots). Costs may be incurred through transportation of this litter to landfill sites in other local authorities unless alternative means can be found such a reuse or recycling.	Reduces amenity value of coastline.  Beach cleaning is good physical outdoor activity. It encourages working with others, making tangible differences to the cleanliness of local beauty spots. Improving the attractiveness of the coast can also help others discover and enjoy what the area has to offer.	Contributor to marine pollution.  Along with efforts to reduce plastic consumption and litter, continual beach clean efforts are needed to reduce existing plastic levels in the ecosystem.	Beach cleans are important but key actions need to be taken to prevent litter at source and this is largely a terrestrial issue.	Crawford Paris CP
<b>Recommendation That, given the economic damage caused by marine litter, the RMP continues to deliver the EGCP – Turning the plastic tide project.</b>		<b>Recommendation That the RMP continues to raise the issue of micro plastics through practical projects and education.</b>	<b>Recommendation That the RMP continues to lead on Marine Litter. Also, to fully engage with KSB, MCS and Marine Scotland</b>	<b>Ian Hay EGCP</b>

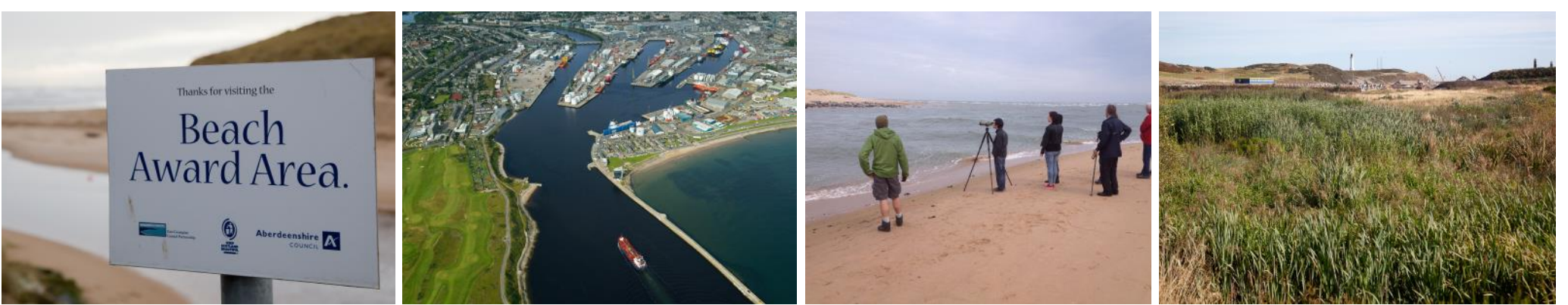
**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN11 MARINE LITTER**

**RMP should consider identifying measures in place to address marine litter and demonstrate how they contribute to the 2014 Scottish Marine Litter Strategy.**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
	Varying conditions such as winds, tides and currents can contribute to the build-up of historic sink sites (e.g. Cairnbulg and Sandford Bay, Peterhead), or may create new or reoccurring marine litter accumulations (e.g. Rattray Head, Craigewan Beach (Peterhead), the Ythan Estuary, Muchalls etc.). Such areas are scenic beauty spots which attract both locals and tourists. For example, Cairnbulg is becoming increasingly popular with campervan users and local dog walkers, while the working harbour is used by local creel fishermen. Identifying potential marine and/or terrestrial sources, RMP should support efforts to eliminate key sink sites, as well as other areas prone to frequent or reoccurring build-up of marine litter. To this end RMP can address environmental inequality imposed by varying marine litter levels across coastal communities.	Coastal litter accumulations in certain locations can often be characterised by items that are more prevalent than others (e.g. abundance of nurdles on the Ythan Estuary, cable ties at Inverbervie, fabric rags at Craigewan Beach, ghost nets at Sandford Bay, rubber gloves and oil filters at Cairnbulg etc.).  RMP should aid identification of links between affected coastal sites and potential polluters/sources to address environmental impacts.  For example, the Ythan Estuary, part of Forvie National Nature Reserve, is home to vulnerable plant species, thousands of breeding/migratory birds and has a permanent seal haul-out area which attracts increasing numbers of visitors to Newburgh Beach. Yet there is an abundance of nurdles (microplastics) along the shores of the River Ythan, as well as macroplastic in the form of large buoys and floats (from the Fishing and Oil and Gas sectors). The variety in size of plastic that is present, coupled with the potential increase in litter left behind by visitors, could negatively affect flora and fauna that thrive on the shores of the NNR. RMP should facilitate and encourage collaboration between industry and local clean-up efforts to sustain and protect marine and coastal ecosystems.	A regional plan could list existing initiatives so that local successes can be rolled out to other areas and opportunities for synergies can be identified. The 2014 Scottish Marine Litter Strategy lists a range of existing actions.	Crawford Paris EGCP
	<b>Recommendation That the RMP continues the work that EGCP is delivering through the turning the plastic tide project</b>		<b>Recommendation That the RMP continues to lead on Marine Litter. Also, to fully engage with KSB, MCS and Marine Scotland</b>	<b>Ian Hay EGCP</b>





**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN12 WATER QUALITY & RESOURCE**

**Drainage and sewage from new developments.**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
			North East Flood Risk Management Plan.	Alison Leslie Aberdeen City Council
			<b>Recommendation That the RMP continues to work with the North East Scotland Flood Risk Management Plan</b>	<b>Ian Hay EGCP</b>

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN12 WATER QUALITY & RESOURCE**

**Water pollution including oil spills**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
	Responsibility rarely established. Installation of water catchment sensor network to ensure polluter can be tracked - and pays			Derek McDonald
Public health implications to coastal water recreation users becoming ill due to poor water quality.	Coastal water quality standards.	Regular coastal water quality monitoring in bathing season and notify users of water quality		Alison Leslie. Aberdeen City Council Sustainability
The RMP should consider the economic cost to Local Authorities for clean-up especially relating to non-hazardous cargos. IH	Responsibility rarely established. However, there have been good examples. In the 2000s SEPA put in a major effort to find the sources of pollution that were affecting the East Tullos burn. This has been very effective, and the Burn is now a successful wildlife site having been close to biologically dead. In addition, the Yellow Fish Campaign has had success in educating the public about the use of storm drains	Deterioration in water quality.	The RMP should maintain strong links with Oil spill contingency and SOSREP. It should also recognise that non toxic spills such as those associated with bulk shipments and containers also pose a major threat. It should also recognise that the area is well placed to deal with major incidents due to the presence of oil supply vessels that could assist a major incidence IH	Ian Hay EGCP
<b>Recommendation That the RMP works with authorities such as SEPA to raise awareness of pollution issues</b>	<b>Recommendation That the RMP recognises that clean water courses are part of the healthy attractive environment.</b>	<b>Recommendation That the RMP works with authorities such as SEPA to raise awareness of pollution issues</b>	<b>Recommendation That the RMP works with authorities such as SEPA to raise awareness of pollution issues</b>	<b>Ian Hay EGCP</b>

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN13 NOISE**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
Marine businesses manage risk effectively and should plan to encourage methods or equipment that will result in the lowest practical noise levels to achieve required objectives	Consideration should be given to the effects of man-made noise and vibration on marine environment and people, with effective mitigation measures being adopted where appropriate.		Activities and development taking place in the marine and costal environment can contribute to noise pollution. Ensure that the impact of noise is accounted for in the various environmental assessments associated with RMP. Details of proposed work should be provided to the Noise Registry.	Claire Herbert Aberdeenshire Council Archelogy
			The UK Marine Noise Registry (MNR) is a database that records the spatial and temporal distribution of loud, low to medium frequency (10Hz- 10kHz) impulsive noise generating activities in UK seas. Understanding the noise generated within the East Grampian region would be useful to determine and how to resolve (if of concern), especially on vulnerable species for example.  <a href="http://marine.gov.scot/information/marine-noise-registry">http://marine.gov.scot/information/marine-noise-registry</a> <a href="https://jncc.gov.uk/our-work/marine-noise-registry/">https://jncc.gov.uk/our-work/marine-noise-registry/</a>	A Duncan Marine Scotland
Increase in renewable energy production.	Minimising the impact of noise from wind turbines onshore noise sensitive receptors.	Setting limits and verifying any noise emissions that may impact onshore receptors.	Planning and development controls.	Alison Leslie. Aberdeen City Council Sustainability
			It should be noted that Noise is taken into account in regard to Marine Licencing. For example, work on the Nigg Bay Harbour had to comply to strict limits on noise levels and operations were timed so as to reduce disturbance to the local Bottlenose Dolphin population.	Ian Hay EGCP
		<b>Recommendation The RMP should work to understand the effect of noise on marine life, especially associated with new developments and technologies. IH</b>	<b>Recommendation That the RMP works closely with Marine Scotland and academic institutions to ensure informed decision making</b>	<b>Ian Hay EGCP</b>

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN14 AIR QUALITY**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
	It should be noted that those who are most greatly affected by poor air quality due to shipping are those who live close to large ports. New technologies such as cold ironing should be considered, and new developments monitored.	Emissions from shipping are declining. More mains power onshore hook-up points required in harbours and facilities for hybrid powered vessels	Development and use of the marine environment should not result in the deterioration of air quality; marine and terrestrial planners should liaise to consider how air quality may be improved	Derek McDonald Aberdeenshire Council Economic Development
The needs of industry and public health need to be carefully balanced. IH	Given the locations of the major ports close major population centres the issue of air quality is a concern. Market Street in Aberdeen was reported as having the third highest particulate level in Scotland in 2019. <a href="https://www.bbc.co.uk/news/uk-scotland-47000273">https://www.bbc.co.uk/news/uk-scotland-47000273</a>  <a href="https://www.sciencedirect.com/science/article/abs/pii/S1361920917309124">https://www.sciencedirect.com/science/article/abs/pii/S1361920917309124</a>		Development and use of the marine environment should not result in the deterioration of air quality; marine and terrestrial planners should liaise to consider how air quality may be improved.	Ian Hay (EGCP)



**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN15 PLANNING ALIGNMENT**

**Cable landfall sites**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
Balance required to ensure critical infrastructure for transition to renewable energy is facilitated - and which in consequence drive significant and sustainable economic growth	Help enhance energy security and mitigate fuel poverty			Derek McDonald Aberdeenshire Council Economic Development
		<b>Recommendation</b> The NMP states that regional marine plans should consider identifying suitable areas for landfall of submarine cables. However, this has already been done in relation to windfarms in the region. IH	<b>Recommendation</b> Landfall sites are considered in the Environmental Impact Assessment of developments and the associated marine licensing procedures. No additional actions will be needed apart from awareness of these land/ sea interactions and the requirement for planning alignment between different regimes.	Ian Hay EGCP

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN15 PLANNING ALIGNMENT**

**RMP should consider compatibility with the plans for any adjoining marine region.**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
MS already fully conversant with sophisticated Marine Spatial Planning tools				Derek McDonald
			EGCP has a long history of joint working with other areas including work on Seafood, Tourism, Litter and through the SeaCORP project.	Ian Hay EGCP
			<b>Recommendation</b> Strong links should be maintained with the neighbouring RMPs and the NMP IH	Ian Hay EGCP

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN16**

**PLANNING ALIGNMENT B**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
Aberdeen Local Development Plan 2017: NE7 Coastal Planning, Policy B5 Aberdeen Harbour. The existing Aberdeen Harbour area is subject to a Development Framework which explores how a greater mix of uses at the harbour can be delivered. In the Proposed Aberdeen Local Development Plan - Policy B4 Aberdeen Harbours and NE4 Our Water Environment which includes coastal development. ALDP 2017 Constraints map The Proposed Aberdeen Local Plan (ALDP) includes Policy B5 Energy Transition Zones - to support the renewable energy transition. Area identified on the ALDP proposals map.				

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN16**

**PLANNING ALIGNMENT B**

**RMP should consider relevant non-statutory plans or strategies to allow for integration of policies of local relevance to be included for consultation. Examples include, but are not restricted to, shoreline management plans and integrated coastal zone management**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
		Current There is a role for coordination of activities both within the region and with neighbouring regions. Local communities may suggest consideration of limits of cruise tourism in the light of impacts on amenities and facilities.	Current The NMP requires a Regional Plan to identify thematic links to other regions while recognising the diversity of travel methods, to identify important areas for protection and development of access and facilities, to ensure good engagement between tourism and recreation and other sectors, to align with Tourism Development Areas within Local Development Plans and promote marine based development strategies, and to support sustainable tourism.	Ian Hay EGCP Plan Hay EGCP

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN16**

**PLANNING ALIGNMENT B**

**RMP should consider relevant non-statutory plans or strategies to allow for integration of policies of local relevance to be included for consultation.**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
			<b>Recommendation</b> That the RMP considers all non-statutory plans effecting the coast and marine area. It should also play a role in developing and reviewing these plans.	Ian Hay EGCP



**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN17 FAIRNESS**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
As mentioned in several places above, the principle of fairness is applied rarely in decision making - at least that is how it appears. The appearance of the Aberdeen Energy Tradition Zone in the Draft Local Plan occurred at very short notice, late on in the process and apparently without much discussion. Nor is there any openly accessible cost-benefit analysis of the "winners and losers" associated with such a development, especially the residents of those living in areas of Multiple Deprivation who appear to be facing all the disadvantages with none of the benefits.				<b>Ewen Cameron Private Individual.</b>
<b>Recommendation</b> A plan such as this, with its highly aspiring objectives must take a much more proactive stance to advocate proper and open demonstration of the advantages and disadvantages of developments and how those advantages and disadvantages will be distributed among the communities that will be affected.				<b>Ewen Cameron Private Individual.</b>

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN18 ENGAGEMENT**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
			The NMP requires a Regional Plan to promote education and the use of codes of conduct and good practice guidance. This concerns an implementation strategy rather than the development of a plan itself. The plans and policies should also have a rigorous consultation process that engages stakeholders at all levels.	<b>Ian Hay EGCP</b>
			<b>Recommendation</b> That the RMP continues this work as required	<b>Ian Hay EGCP</b>

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
			The RMP need strong evidence base to enable decision making. To this end EGCP has teamed up with other LCPs on the east coast to develop a State of the Coast report which will later inform a RMP strategic Assessment.	<b>Ian Hay EGCP</b>
Again, as mentioned in several places above, the application of SOUND EVIDENCE is frequently glossed over in decision making or those advocating the development argue their experience is more valid, accurate and reliable than the questions raised by those with doubts, reservations and seeking objective evidence.				<b>Ewen Cameron Private Individual.</b>
			<b>Recommendation</b> That the RMP works with Marine Scotland and others to ensure that it has sufficient data, and understanding of that data, for decision making.	<b>Ian Hay EGCP</b>
<b>Recommendation - A plan such as this, with its highly aspiring objectives must take a much more proactive stance to advocate proper and open demonstration of the objective evidence and analysis supporting both advantages and disadvantages of developments and how those advantages and disadvantages will be distributed among the communities that will be affected. As in many things, it is also the only reasonable way of having the opportunities of future generations to be at least considered in the decision making process.</b>				<b>Ewen Cameron Private Individual.</b>

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN19 SOUND EVIDENCE**

Data Availability

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
			The RMP need strong evidence base to enable decision making. To this end EGCP has teamed up with other LCPs on the east coast to develop a State of the Coast report which will later inform a RMP strategic Assessment. This will also include work to aid in the interpretation of data from the NMPi system.	<b>Ian Hay EGCP</b>
			<b>Recommendation</b> That Data required for Marine Planning is available for businesses to help them make good decisions about future developments	<b>Ian Hay EGCP</b>

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN20**

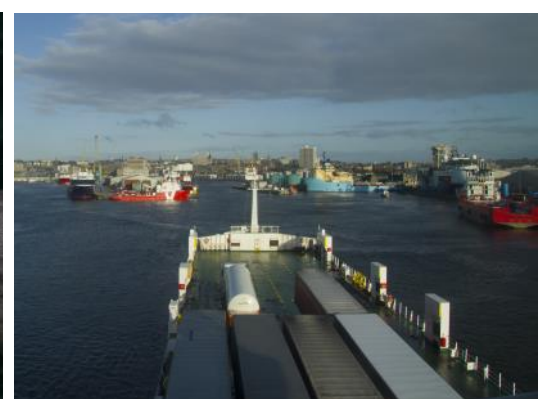
**ADAPTIVE MANAGEMENT**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
			Coastal protection. Consultation and partnership work - examining natural coastal management solutions – area north of the Don. North East Flood Risk Management Plan. Coastal studies - Footdee coastal study and Aberdeen North Beach Coastal Defence Feasibility. Aberdeen Beach recharge took place in 2006. Aberdeen Adapts: Climate Adaptation Framework.	<b>Alison Leslie, Aberdeen City Council Sustainability</b>

**Table 1: HIGH-LEVEL MARINE OBJECTIVES & GENERAL POLICIES**

**GEN21 CUMULATIVE IMPACTS**

ACHIEVING A SUSTAINABLE MARINE ECONOMY	ENSURING A STRONG, HEALTHY AND JUST SOCIETY	LIVING WITHIN ENVIRONMENTAL LIMITS	PROMOTING GOOD GOVERNANCE	Contributor
It should be noted that the development of business hub has advantages for businesses due to the proximity of goods and services		It is the responsibility of bodies such as NatureScot and SEPA to take cumulative effects into account	This will be included in the SeaCORP project as well as work by Marine Scotland Science and other institutions.	<b>Ian Hay EGCP</b>
			<b>Recommendation</b> That the RMP ensures that cumulative effects are considered when making decisions.	<b>Ian Hay EGCP</b>



**Table 2 ISSUES BY SECTORCHAPTER AND THE FOUR KEY ISSUE THEMES IN THE NATIONAL MARINE PLAN**

**SHIPPING, PORTS, HARBOURS AND FERRIES**

Table 2: Sectors	SUPPORTING ECONOMICALLY PRODUCTIVE ACTIVITIES	INTERACTIONS WITH OTHER USERS	LIVING WITHIN ENVIRONMENTAL LIMITS	CLIMATE CHANGE	GOOD GOVERNANCE	
				Marine transport disruptions due to severe weather. Opportunities for greater low carbon transportation.		
	The three major ports are all successful and are expanding to capture diversification opportunities.  There are issues with a number of smaller harbours where there is a mismatch between value to the local community, cost of upkeep and revenue.	All local ports are highly interconnected with other sectors by their nature.	All the major ports operate to high environmental standards.	Reducing carbon emissions is included in each of the ports environmental policy.	All the ports have comprehensive management systems ranging from boards of directors and trustees, to control by Aberdeenshire Council.	Ian Hay EGCP
<a href="http://www.fraserburgh-harbour.co.uk/">Fraserburgh Harbour</a>	Fraserburgh harbour is the UK's largest Nephrops landing port. It is a pivotal to the local economy, anchoring a wide range of fisheries, maritime and ancillary businesses It was selected in 2019 as the O&M base for MOWEL. Brexit and restrictions caused by COVID19 are causing severe disruption to the seafood export trade. It is not known if this will be long term.	The harbour is very community-orientated. A harbour users group meets regularly	Fraserburgh harbour has a comprehensive Environmental Policy and is firmly committed to supporting marine litter projects (eg TTPT & KIMO)	Opportunities for greater low carbon transportation.	Fraserburgh Harbour is a trust port and is governed by Fraserburgh Harbour Commissioners, an independent statutory body created by its own legislation responsible for holding, managing, maintaining and developing the Port of Fraserburgh. All profits are reinvested into the port.	Ian Hay EGCP
<a href="#">Cairnbulg Harbour</a>	Recommendation That a review is undertaken to understand the financial and management status of small harbours				Recommendation That a review is undertaken to understand the financial and management status of small harbours	Ian Hay EGCP
<a href="https://www.peterheadport.co.uk/">Peterhead Harbour</a>	Peterhead Harbour is the focal point for the town's economy through both the fishing industry and the oil supply sector. A study by SE in 2017 valued the economic impact of the port at £800M pa  Brexit and restrictions caused by COVID19 are currently causing disruption to fishing and seafood processing It is not known if this will be long term.	Peterhead Port Authority undertakes regular engagement with and support for community projects and activity	Peterhead is the only port in Scotland with the EcoPorts/PERS (Port Environmental Review System) accreditation, issued by the European Sea Ports Organisation to recognise high environmental performance. PERS is audited by Lloyd's Register and renewed every two years.  PPA is strongly supportive of marine litter projects (eg TPTT, KIMO)		Peterhead is a trust port and is governed by the board of Peterhead Port Authority	Ian Hay EGCP
<a href="#">Boddam Harbour</a>	Recommendation That a review is undertaken to understand the financial and management status of small harbours				Recommendation That a review is undertaken to understand the financial and management status of small harbours	Ian Hay EGCP
<a href="#">Port Errol</a>	Recommendation That a review is undertaken to understand the financial and management status of small harbours				Recommendation That a review is undertaken to understand the financial and management status of small harbours	Ian Hay EGCP
<a href="#">Collieston Harbour</a>	In 2008 EGCP published a report highlighting the issues surrounding the sustainable funding of small harbours. This still needs to be addressed as there is a major mismatch between their ability to gain funds and their value to the local area. (IH)					Ian Hay EGCP
Aberdeen Harbour				Policy under the Aberdeen Local Development Plan 2017: Policy B5 Aberdeen Harbour. The existing Aberdeen Harbour area is subject to a Development Framework which explores how a greater mix of uses at the harbour can be delivered.  And as Policy B4 Aberdeen Harbours in the Proposed Aberdeen Local Development Plan.		Alison Leslie. Aberdeen City Council Sustainability
	The expansion of Aberdeen harbour at Nigg Bay is continuing		Aberdeen is one of two ports in Scotland which are part of a European environmental initiative, EcoPorts, with accreditations including ISO 45001 (2018) and ISO 14001 (2018)	Work has been done in Aberdeen to investigate cold ironing, supplying electricity while in port so that ships don't use generators. This may be considered in the future.	Has a long-established trust port structure with a board of non-executive and executive directors	Ian Hay EGCP
<a href="#">Nigg Bay</a>				A Development Framework has been prepared for the harbour at Bay of Nigg and its surrounding area. Under Supplementary Guidance – Aberdeen Local Development Plan 2017. <a href="https://www.aberdeencity.gov.uk/sites/default/files/nigg_bay_developframework_draft_28072015.pdf">https://www.aberdeencity.gov.uk/sites/default/files/nigg_bay_developframework_draft_28072015.pdf</a>		Alison Leslie. Aberdeen City Council Sustainability



**Table 2 ISSUES BY SECTORCHAPTER AND THE FOUR KEY ISSUE THEMES IN THE NATIONAL MARINE PLAN**

SUBMARINE CABLES

Table 2: Sectors	SUPPORTING ECONOMICALLY PRODUCTIVE ACTIVITIES	INTERACTIONS WITH OTHER USERS	LIVING WITHIN ENVIRONMENTAL LIMITS	CLIMATE CHANGE	GOOD GOVERNANCE	
Awareness of historic character of many of the region's harbour, including that some are designated. Dredging can also have an impact on the historic environment, where there are buried remains (of wrecks, earlier harbours etc)					Making sure any harbour redevelopment or dredging plans take account of the historic environment in any proposals.	Tara Murray Aberdeenshire Council Climate Change
Oil & Gas cables; offshore windfarm cables		Possible benefits as no take zones. Negative impact on fishing industry although some benefit from protection work.				Ian Hay EGCP
RMP should consider identifying suitable areas for land fall of submarine cables and integrate with spatial priorities for submarine cables within Local Development Plans.	Recommendation The RMP should consider suitable places for cable landfall			Recommendation That the RMP considers the benefits of renewable energy when making decisions.		Ian Hay EGCP

**Table 2 ISSUES BY SECTORCHAPTER AND THE FOUR KEY ISSUE THEMES IN THE NATIONAL MARINE PLAN**

SUBMARINE CABLES

Table 2: Sectors	SUPPORTING ECONOMICALLY PRODUCTIVE ACTIVITIES	INTERACTIONS WITH OTHER USERS	LIVING WITHIN ENVIRONMENTAL LIMITS	CLIMATE CHANGE	GOOD GOVERNANCE	
RMP should consider engaging on a proactive basis to ensure that the operational requirements of defence are taken into account in the development of marine plans.					<b>Recommendation This is agreed although a minor impact in this area</b>	<b>Ian Hay EGCP</b>
Awareness of impacts of offshore development on the historic environment.					Making sure any offshore development plans take account of the historic environment in any proposals.	Tara Murray Aberdeenshire Council Climate Change

**Table 2 ISSUES BY SECTORCHAPTER AND THE FOUR KEY ISSUE THEMES IN THE NATIONAL MARINE PLAN**

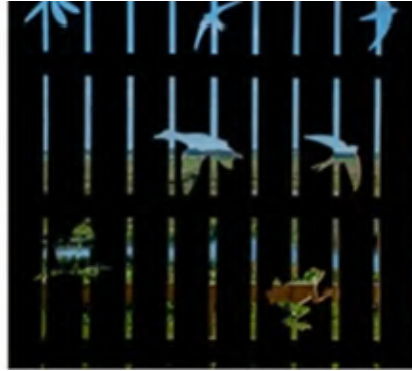
AGGREGATES

Table 2: Sectors	SUPPORTING ECONOMICALLY PRODUCTIVE ACTIVITIES	INTERACTIONS WITH OTHER USERS	LIVING WITHIN ENVIRONMENTAL LIMITS	CLIMATE CHANGE	GOOD GOVERNANCE	
RMP should consider if areas of aggregate or mineral resource require any degree of safeguarding.	Aggregate extraction is covered by marine licensing. There are probably no such areas in the region.	Local marine aggregate has been used for building coastal defences at Montrose.	Any reactivation of licences would require fresh permissions and an Environmental Impact Assessment.			Ian Hay EGCP

**Table 3 MAJOR DEVELOPMENT SITES AND FOUR KEY ISSUE THEMES IN THE NATIONAL MARINE PLAN**

AGGREGATES

Table 3	SUPPORTING ECONOMICALLY PRODUCTIVE ACTIVITIES	INTERACTIONS WITH OTHER USERS	LIVING WITHIN ENVIRONMENTAL LIMITS	CLIMATE CHANGE	GOOD GOVERNANCE	
MAJOR DEVELOPMENT SITES						
Aberdeen South harbour	<b>Recommendation That the RMP works with Aberdeen harbour to maximise sustainable development</b>	<b>Recommendation That the RMP resists moves to introduce small pleasure boats to the area to issues with Dolphins</b>			<b>Recommendation That the RMP works closely with Aberdeen harbour</b>	Ian Hay EGCP
Accord Project <a href="https://pale-blu.com/acorn/">https://pale-blu.com/acorn/</a>						
Developer contributions for coastal infrastructure and/or mitigation	Drives Local Authorities to invest and create opportunities		Mitigation of impacts elsewhere in area e.g. net gain ( <a href="#">link</a> )			Ian Hay EGCP
<b>Energy Transition Zones</b>	Aberdeen City Council has allocated two sites in its Proposed Local Development Plan for an Energy Transition Zone (ETZ) adjacent to Aberdeen Harbour South. This is also a candidate project for the National Planning Framework 4.	This project will be independent to but enjoy proximity benefits of its location adjacent to Aberdeen Harbour South.	The main focus of the ETZ is to support the development and delivery of renewable energy technologies.	The project should benefit meeting the National Climate Change targets		Louise Napier Aberdeen City Council City Growth
	<b>Recommendation: Refer to the ETZ in the RMP. Show it spatially on maps.</b>	<b>Recommendation: Show spatial links between ETZ, Harbour and offshore wind.</b>				<b>Louise Napier Aberdeen City Council City Growth</b>
<b>Carbon Capture and Storage (CCS) at Peterhead</b>	There are a number of CCS projects being progressed across Aberdeenshire.	Interaction with Peterhead Power Plant and the use of existing gas infrastructure	CCS will reduce emissions.	CCS will reduce emissions.		Louise Napier Aberdeen City Council City Growth



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



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 & guidance](#)[UK 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 Local Development 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 overall 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 the RMP 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 and empty 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. Please let me know if you would like clarification on any aspect of our advice.

Yours sincerely

Shirley Reid

Area Officer - Tayside and Grampian