

A consultation on the pre-consultation draft Clyde Regional Marine Plan

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The draft Clyde Regional Marine Plan

1 The vision, aims and guiding principles are written out below. Do you think these are the right vision, aims and guiding principles for the Clyde Marine Region?

COAST as a member of the CMPP and a community led organisation welcome this pre-consultation draft of the plan and the opportunity to be consulted formally at this stage before the plan goes back to Marine Scotland and Ministers before the full final statutory public consultation. We wish to acknowledge the amount of work that the staff and members of the CMPP have undertaken for the plan development process to have got to this stage. However, we also want the Scottish Government and Marine Scotland to recognise that not enough resources were budgeted for staff, stakeholders and data projects for this plan during its development process. Lessons need to be learned for the development of future regional plans and for the ongoing future development and adaptation of this one.

The Clyde Regional Marine Plan (CRMP) will be among the first of its kind in Scotland and will therefore become a benchmark for subsequent plans. Ensuring that the Clyde RMP works in a way that is appropriate for nature conservation is therefore key.

Such plans are important because decision-makers will be required to ‘take any authorisation or enforcement decision in accordance with the appropriate marine plans, unless relevant considerations indicate otherwise’ⁱ and ‘have regard to’ the plan in making any other decisions.ⁱⁱ

COAST agree with the vision in general but we need firm, measurable and radical goals if we are going to meet the required biodiversity and climate change targets for long term sustainability. The current aims are vague and need specific and measurable targets, which the objectives and policies of the plan then need to be aligned with and to deliver.

Regarding the wording of the aims there are vague statements present which could allow the plan to become a mandate for unfettered development and environmental mismanagement rather than to meet the vision. e.g. *‘where appropriate, enhance the health of the Clyde Marine Region’, ‘development do not significantly impact Priority Marine Features’.*

The low carbon and climate change related aims need to be much clearer and measurable and reflected in the objectives and policies e.g. specific targets to reduce carbon emissions from fishing, ferry use, and enhance capture via the restoration and growth of carbon sinks e.g. seagrass, kelp and maerl, protection and enhancement of loch muds.

In our opinion the aims are diluted because of the aspirational sectorial approach that has been taken through the plan development process and this has resulted thus far in a draft which is mediocre in its aims, objectives and policies. The plan needs to ensure that the the guiding principles are maintained throughout to ensure that a holistic ecosystem approach is taken and development is sustainable (see below)

The CMPP also need to clear in thought and word and to have at the forefront of aims, objectives and policy what it is using as the definition of "sustainable". This is clear within the CMPP constitution and vision, as the definition is the same as the UN definition. i.e.

	<p>In 1987, the United Nations Brundtland Commission defined sustainability as “meeting the needs of the present without compromising the ability of future generations to meet their own needs.” This definition and also that of the application of the precautionary principle in our opinion should not be relegated to footnotes to the guiding principles within the plan.</p> <p>N.B. Any footnote references within the text refer to a list of reference sources at the end of this document.</p>		
<p>Vision: The marine and coastal environment of the Clyde Marine Region is clean, healthy, safe, productive, biologically diverse and accessible for all. It is managed sustainably to support productive and thriving coastal communities and to allow nature to flourish.</p> <p>Aims:</p> <ul style="list-style-type: none"> • Provide a framework that supports opportunities for sustainable development and attracts investment. • Guide marine developers in early identification of localities of most and least constraint and potential impact. • Underpin the regeneration of urban coastal areas and support the economy in rural coastal areas. • Maintain, and where appropriate, enhance the health of the Clyde Marine Region, including the biodiversity, landscape and seascape, by protecting and improving its natural resources. • Ensure that the Marine Protected Area network contributes to the protection and enhancement of the region, and identify opportunities for environmental enhancement. • Ensure that activities and development do not significantly impact Priority Marine Features. • Promote sustainable and socially inclusive development and use of marine and coastal resources. • Encourage the reconnection of people with the sea through cultural heritage, work opportunities, educational initiatives and recreational pursuits. • Contribute to the wellbeing and cultural diversity of coastal communities. • Contribute to Scotland’s transition to a low-carbon economy. • Ensure that decisions in the Clyde Marine Region are taken in a way that maximise opportunities to mitigate and adapt to the consequences of climate change, thus creating resilient local communities. <p>Guiding principles:</p> <ol style="list-style-type: none"> (1) Sustainable Development (2) Support delivery of Good Environmental Status (3) Ecosystem Approach (4) Adding value, not complexity (5) Multiple responsible use of marine space 			
2	<p>Do you have comments relating to the following chapters of the Clyde Regional Marine Plan? If commenting on multiple chapters, please indicate which chapter you are referring to in the comment box below.</p>		
	Climate change Historic environment Landscape/seascape Coastal processes Natural heritage	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Sea fisheries Aquaculture Sports, recreation & tourism Shipping, ports, harbours & ferries

Non-native species	Yes <input type="checkbox"/> No <input type="checkbox"/>	Defence	Yes <input type="checkbox"/> No <input type="checkbox"/>
Marine litter	Yes <input type="checkbox"/> No <input type="checkbox"/>	Energy, subsea cables & pipelines	Yes <input type="checkbox"/> No <input type="checkbox"/>
All sectors – general policy	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Marine aggregates	Yes <input type="checkbox"/> No <input type="checkbox"/>

Section 1. General Policies

MSP offers many potential benefits to managing competing uses of the marine environment, whilst also ensuring the delivery of key ecosystems goods and services. However, in order to achieve such results, a plan must be sufficiently detailed by ‘lay[ing] out the constraints and conditions imposed on such development’ and ‘[providing] direction for further zoning and regulations.’ⁱⁱⁱ

- Overall, the Clyde RMP should be more ambitious in its policies on nature conservation. With this in mind, more detailed policies should be developed in order to provide guidance to decision-makers and developers about the areas in which development should be avoided or should be subject to more stringent controls.
- Specific policies should be introduced into all the sectoral chapters of the RMP in order to recognise the management advice of SNH that the expansion of certain developments or activities should be undertaken with care within MPAs.
- A specific policy should be introduced in order to ensure that cumulative cross-sectorial impacts are bound to be taken into account by decision-makers.
- In order to ensure that appropriate weight is given to the RMP policies, all policies should be reviewed and edited so that they are expressed in normative language, using terms such as ‘must’ or ‘shall’ instead of ‘should’ or ‘will be supported where’.

CH 1 Climate Change

The CRMP needs to prioritise on planned measures to both de-carbonise all activities and protect and where possibly enhance natural marine carbon stores, such as seagrass, maerl, kelp and sea loch mud.

There are certain species for which steps should be taken not only to promote their recovery within existing limits, but also to encourage their active enhancement and expansion. In this category, one can highlight habitats which play a vital ecosystem service as carbon sinks. It is welcome that Policy CC2 of the draft Clyde RMP already acknowledges the important role of such habitats by providing that ‘development(s) and/or activities will be supported where they can demonstrate that they will avoid damage to and/or, where possible, enhance the capacity of recognised carbon sinks in the Clyde Marine Region.’ Yet, given the urgency of addressing climate change and ocean acidification, recognised by the recent declaration of a climate emergency by the First Minister^{iv}, the Clyde RMP could be more ambitious in this respect. In particular, it could establish zones around those carbon sinks capable of natural regeneration, in which developments and activities will be minimised in order to permit the expansion of the carbon sink over time. Sea grass meadows would be an obvious candidate for such protection, given their potential for growth over a relatively short period of time and the fact that the extent of these habitats is significantly condensed compared to their historic range.

Each sector/stakeholder in the Clyde Marine Region should be tasked with producing its own Climate Change action plan by the end of 2019 and these should then be included in the CRMP.

- Policy CC2 should be broadened to establish buffer zones around natural carbon sinks in order to allow their expansion.

CH 3. Landscape/Seascape

The measure of whether Objective SCAPE 1 is being or has been achieved is vague and specific measures need to be included here rather than the references to other documents e.g. a measureable decrease/no change/increase in the number or size of existing offshore fish farms within the Clyde's designated National Scenic Areas. This Objective can include other measures of course.

We have selected offshore fish farms as an example measure of the SCAPE 1 Objective because, in our opinion, and that of many of our communities, their number in the Clyde Region and their environmental visual, auditory and olfactory impacts have now increased beyond what is acceptable to local communities and tourist visitors alike.

CH 4 Coastal Processes, Coastal Flood and Storm Damage Alleviation

The measurement of Objective CP1 is not specific or measureable and this specificity is needed within an adaptive plan. In this Chapter reference needs to be made to some specific habitats types, which protect the coast and will help alleviate damage through sea level rise and storm surge so that the thought processes of parties using this document are integrated across Ch1 and Ch5 and cumulative effects are also considered e.g. the value of kelp and seagrass in mitigating the effects of wave action plus carbon capture and as a biodiverse habitat.

CH 5. Natural Heritage

The chapter as drafted at present is considered a missed opportunity by COAST. The final plan need to be more ambitious in its policies on nature conservation in general, especially in light of the recent May 2019 IPBES report <https://www.ipbes.net/news/ipbes-global-assessment-summary-policymakers-pdf> and CBD reports. At present Scotland and the UK are behind the curve on most of the twenty Convention on Biological Diversity AICHI Targets <https://www.cbd.int/doc/nr/nr-06/gb-nr-06-p3-en.pdf> in many areas relevant to the Clyde marine region e.g. fisheries management and pollution from open cage fish farms, statutory management in place for only 5% of the 22% of Scotland's seas designated as protected. The Clyde Sea Sill MPA still has no statutory management measures in place. This chapter need substantially changing if we are to stop biodiversity decline and then rebuild it, which is surely in every individual and organisation's interest.

The introduction of MSP in Scotland provides an important opportunity to bolster the network of Nature Conservation Marine Protected Areas (MPAs). According to the Marine (Scotland) Act 2010, a RMP must include 'policies (however expressed) for and in connection with the sustainable development of the area to which the plan applies [and] policies on the contribution of Nature Conservation MPAs to the protection and enhancement of the area to which the plan applies.'^v Thus, one would expect the MPAs to feature centrally in a RMP, with clear and precise policies to demonstrate how the plan contributes to the protection of MPAs.

Objective NH2 explicitly refers to Marine Protected Areas, providing that:

‘Development and use of the coastal and marine environment does not have significant negative impact on biodiversity, the Marine Protected Area network, other protected habitats and species and Priority Marine Features in line with the relevant conservation objectives and, where possible, contributes to their maintenance and/or enhancement’.

This is a welcome objective, but when it comes to particular policies in order to achieve this objective, the draft RMP does little more than reiterate requirements to ‘comply with international, national and local legal requirements for protected areas and species’ or repeat the stipulations of the National Marine Plan.

Policy NH1 does appear to go a little further than the National Marine Plan by saying that *‘where Priority Marine Features are known or found to exist, licence applications should demonstrate consideration of sensitivities and potential impacts through tools such as the Feature Activity Sensitivity Tool’*, but it is noticeable that it employs non-prescriptive language. It is recommended that this language is amended to make it clear that licence applications **must** or **shall** demonstrate consideration of potential impacts.

Policy NH2 also provides some further clarification of the situations in which a development proposal will be supported, including if they ‘contribute to the delivery of the conservation objectives of Marine Protected Areas where appropriate,’ but this policy suffers from significant ambiguity.

Shortcomings and Proposed Changes to Chapter 5: Natural Heritage

Marine spatial plans must be sufficiently detailed in order to provide clear guidance to decision-makers as to how to act to achieve the objectives of the plan. Furthermore, marine spatial plans can also play an important role in public education by conveying important information about an area.^{vi} These objectives are not achieved if it is necessary to cross-reference a range of other documents in order to understand the scope and substance of the policies. In this regard, the draft Clyde RMP falls short in important respects. Whilst it is welcome that there are specific policies addressing MPAs and priority marine features, the current policies relating to natural heritage in the draft Clyde RMP are drafted in an abstract manner and a number of improvements could be made.

- The draft Clyde RMP does not name the MPAs and other significant nature designations that are present in the Clyde marine region, nor the features for which they are designated to protect. This can be contrasted with existing marine plans already developed in other Scottish regions, such as the non-statutory Shetland Islands Marine Spatial Plan (Fourth Edition 2015) which names and describes the two nature conservation MPAs in the plan area.^{vii} This practice should be followed by the Clyde RMP. **It is therefore recommended that Chapter 5 of the draft RMP incorporates a description of the three Nature Conservation MPAs located in the Clyde region and explain their protected features, as well as other important nature designations.**
- At it currently stands, the draft Clyde RMP does not recognise that certain marine species are under greater threats than others. The Clyde marine region is home to a number of species which have an unfavourable conservation status or are in decline, including a number of species within MPAs, such as the flame shell beds in the Upper Loch Fyne and Loch Goil MPA and the maerl beds in the South Arran MPA. Several species of sea birds are also in decline.^{viii} Given the precarious status of these ecosystems and the need for a precautionary approach to their management^{ix}, it is incumbent on the drafters of the plan

to place greater emphasis on ecosystem recovery by expressly recognising that active steps must be taken in this direction. **It is recommended that a policy is explicitly included in the RMP to require decision-makers to exercise caution when considering proposals for developments or activities which may impact upon declining species or habitats or those species and habitats in unfavourable condition.**

- There are certain species for which steps should be taken not only to promote their recovery within existing limits, but also to encourage their active enhancement and expansion. In this category, one can highlight habitats which play a vital ecosystem service as carbon sinks. It is welcome that Policy CC2 of the draft Clyde RMP already acknowledges the important role of such habitats by providing that ‘development(s) and/or activities will be supported where they can demonstrate that they will avoid damage to and/or, where possible, enhance the capacity of recognised carbon sinks in the Clyde Marine Region.’ Yet, given the urgency of addressing climate change and ocean acidification, recognised by the recent declaration of a climate emergency by the First Minister^x, the Clyde RMP could be more ambitious in this respect. **In particular, it could establish zones around those carbon sinks capable of natural regeneration, in which developments and activities will be minimised in order to permit the expansion of the carbon sink over time. Sea grass meadows would be an obvious candidate for such protection, given their potential for growth over a relatively short period of time and the fact that the extent of these habitats is significantly condensed compared to their historic range.**
- The draft Clyde RMP also does not engage with the question of how specific sectoral pressures on MPAs should be controlled in order to support the overall health of ecosystems therein. In failing to do so, the draft RMP misses the opportunities for marine planning to be used to ‘provide stronger policy protection’ to natural heritage by, among other things, ‘steer[ing] damaging activities away from sensitive features.’^{xi} One tool to achieve this is ocean zoning, which has been described as a principal measure for effective marine spatial planning due to its ability to identify areas where particular activities should be encouraged or discouraged in order to ‘protect the natural values of the marine management area while allowing reasonable human uses of the area.’^{xii} Ocean zoning also provides benefits by providing clearer guidance to potential developers as to where activities may or may not be permitted.

In the present context, it may not be appropriate to pursue large-scale zoning of areas in which activities should be prioritised across the region^{xiii}, but it is **recommended that nature conservation considerations are integrated into relevant sectoral chapters of the Clyde RMP, by the introduction of policies to ensure that certain polluting or damaging activities are not supported in or near to Nature Conservation MPAs unless it can be shown that there is no detrimental impact on marine biological diversity.** Such a policy would not affect existing activity, but rather it would be aimed at **minimising additional pressure on MPAs by establishing a presumption against authorisation.** In developing such policies, particular regard should be had to existing management advice from Scottish Natural Heritage, which has already identified certain activities whose further expansion should be carefully controlled within MPAs, including finfish farms and shellfish farms in the Upper Loch Fyne and Loch Goil MPA^{xiv} and in the South Arran MPA where it concluded that ‘the location of future developments would need careful consideration.’^{xv} Nor is it only aquaculture which could be zoned in this way. An increase in anchorages and moorings may also pose risks to seabed habitat and SNH has thus called for caution in consideration of any new proposals in the Upper Loch Fyne and Loch Goil MPA^{xvi} and the

need to remove or avoid such pressures in parts of the South Arran MPA.^{xvii} **This management advice should be translated into specific policies in the relevant chapters of the Clyde RMP.**

- The current text of the draft RMP emphasises the impacts of individual proposals for marine and coastal development and/or activities, but it does not provide sufficient emphasis on cumulative impacts. (Policy NH 6 mentions research on cumulative impacts, but there is no mention of cumulative impacts in Policy NH 1 or 2). Yet, the UK Marine Policy Statement expressly provides that marine plans ‘should identify how the potential impacts of activities will be managed, including cumulative effects’^{xviii} and other regional marine plans developed in other parts of the United Kingdom have included explicit policies to this end. For example, the East of England Marine Plan provides that ‘[c]umulative impacts affecting the ecosystem of the East marine plans and adjacent areas (marine, terrestrial) should be addressed in decision-making and plan implementation.’^{xix} **It is recommended that the Clyde RMP similarly expressly recognises the need for cumulative impacts to be addressed in decision-making, particularly in relation to proposals or activities taking place in or in close proximity to MPAs and other designated protected areas, due to the need to promote the overall health and ecological integrity of such areas.**

Summary of Recommendations for Chapter 5 and the RMP in General

- Regional marine plans are a key informational document for developers and members of the public and they should therefore provide detailed information on the key marine nature conservation designations within the marine region, including the names, locations and protected features of Nature Conservation Marine Protected Areas (MPAs) and European Marine Sites.
- In order to ensure that appropriate weight is given to nature conservation policies, relevant policies should be expressed in normative language, using terms such as ‘must’ or ‘shall’ instead of ‘should’.
- Regional marine plans will only fulfil their potential as tools to balance competing uses of the marine environment and ensure the integrity of marine ecosystems if they are ambitious in their content and their policies go above and beyond the general prescriptions of the National Marine Plan. Regional marine plans also provide an opportunity to go beyond the minimum requirements of conserving the protected features of MPAs through the adoption of policies to encourage the enhancement of these areas in order to ensure their overall resilience. Consideration should therefore be given to using regional marine plans to minimise negative pressures on MPAs by limiting new developments or activities within or in the vicinity of these areas. Where appropriate, nature conservation considerations should be integrated into sectoral policies in order to highlight restrictions on a particular type of development or activity, using ocean zoning as a planning tool where feasible.
- Regional marine plans should include a specific policy to ensure that MPA Management Plans or Schemes or any other NCMPA management tools (e.g. as outlined in the Marine Scotland NCMPA: Draft Management Handbook 2013) are explicitly considered and any objectives, policies, restrictions or guidance therein taken account of during planning, licensing and consultation.
- Particular attention should be paid by regional marine plans to ensuring that species or habitats in unfavourable conservation status are not affected by development or other activities by expressly identifying the relevant features and the precautionary steps that must be taken to ensure their protection.

- Regional marine plans should emphasise the regeneration of natural carbon sinks by establishing buffer zones around suitable sites in order to allow these features to expand, free from the pressures of new activities or developments.
- Regional marine plans should include a specific policy on cumulative impacts of activities and developments.

CH 8 All sectors-general policy

There is an absence of ecosystem-approach related objectives and policies here, which are required to ensure that cross-sectorial and cumulative effects are considered accurately by decision makers.

A specific policy should be introduced in order to ensure that cumulative cross-sectorial impacts are bound to be taken into account by decision-makers.

CH 9 Sea Fisheries

This sector of the marine plan is one of the areas with the most significant concerns documented in the CMPP Clyde Marine Region Assessment document along with the documented pressure on our shallow water habitats. The [Clyde Marine Region Assessment](#) listed numerous concerns for fish and shellfish populations, referred to the decline in the historic fisheries for herring and demersal fish, and recorded in particular that brown crab, velvet crab and lobster are currently overfished.

The sea fishery ecosystem services of the Clyde are well documented in peer reviewed publications to have declined radically and therefore the current status quo needs intervention.

The non-specific and therefore non-measurable Objectives together with the lack of policy detail are not powerful enough to deliver the reform and the recovery that is required for the fish and shellfish within the Clyde ecosystem. The CRMP should include objectives and policies, which address each concern documented in the Assessment. In particular, where there is evidence of issues for a particular species then the Plan needs to address them directly for that species and take account of cumulative or interactive effects on other species and the wider ecosystem.

As with many of the objectives elsewhere in this draft plan we state again that the objectives need to be measurable and in the case of the fisheries then these need to be measurable with regard to socio-economics, ecosystem services, biodiversity (richness, abundance, demographics) and most importantly sustainability (spawning potential, catch trend and size-age composition).

Objective Fish 1 It is the objective of The CRMP Vision and Aims and the Objective FISH 1 that the sector activity in the Clyde Region is sustainable and COAST consider that the policies in this Chapter do not deliver on that responsibility. For this to be delivered then the CRMP needs to contain specific Policies to drive management measures toward measurable Objectives and thereby ensure that the direction of travel is toward sustainability for our fishery and our ecosystem.

Although the WCRIFG management plan is referred to in this Chapter it needs to be detailed in full rather than via a hyperlink to ensure transparency and clarity. COAST

consider that the WCRIFG plan as it stands is not capable of delivering on its own three strategic objectives, all three of which we wholly support, and are as follows:

1. Biological - to conserve, enhance and restore commercial stocks in inshore waters and the supporting ecosystem.
2. Economical - to optimise long term and sustained economic return to local coastal communities that are dependent on inshore fisheries, and to promote quality initiatives.
3. Environmental - to maintain and restore the quality of the inshore marine environment.

We believe that an effective fisheries management plan can be produced for inclusion in the CRMP with measureable objectives and supporting policies if the WCRIFG work with the Clyde 2020 stakeholders and their Research Advisory Group (RAG) of scientists under the umbrella of the CMPP. It is our opinion that the fact that the CMPP is a constituted and statutory body, with the powers commensurate with its Ministerial direction, that it should be the hub around which the sector plan is formed with the advisory bodies of the WCRIFG and Clyde 2020 & RAG feeding into the plan. Agreement on the components of the sector plan may not be easy because of the large variety of stakeholders within the CMPP. However, we see this as the only way forward under the current RIFG structure that Marine Scotland has established if a plan for fisheries is to be established, which meets the strategic objectives of the WCRIFG and also the agreed Vision of the CMPP. We would like to see a collegiate approach to the development of an adaptive fisheries management plan under the umbrella of the CMPP detailed in this Objective.

Objective FISH 2 needs typographic error 'Vehicle' correcting to 'Vessel' Monitoring Systems. This also needs to be a lot more powerful in line with the use of Remote Electronic Monitoring of all fishing vessels, which the Government committed to last November. These data need to monitor the geographic location of fishing effort to allow adaptive management measures to be introduced but also to be used for the enforcement of protected areas together with an empowered and well-resourced Marine Scotland Compliance department.

Ch 10 Aquaculture

This Chapter needs a lot of revision in the light of the recommendations from the cross party RECC Committee report on finfish farming following the ECCLR Committee report. Both reports are clear that the status quo is unacceptable and the RECC report is clear that if the industry is to be allowed to expand then it must prove itself sustainable. The first tranche of new SEPA Finfish Aquaculture Sector regulations is coming into effect at end May 2019 but they are also way behind schedule on addressing the cumulative effects of the industry. In addition, recent high salmon mortalities in farms from lice infestations and algal blooms have been described by the industry as naturally occurring and due to unusually warm waters. With climate change these events will become more and more common and the CRMP needs to consider this. This is one of the key areas, which if the CRMP is not clear on its measureable objectives and supporting policies then the vision and aims of the CMPP will not be fulfilled and we need to ensure that cumulative effects within and cross-sector are considered at all times. These cumulative effects cover infectious disease, sea lice, pesticide treatments, bath treatments and sewage on the seabed and in the water column. The objectives and policies need to reflect these concerns clearly and ensure that they continue to be aligned with the Vision and Aims of the CMPP and CRMP.

Objective AQUA 1: **This objective requires specific and measurable targets on**

sustainability and diversification and these are lacking here. It is clear from SEPAs published work on eight Shetland finfish farms that there are cumulative effects but they have not been investigated in the Clyde Marine Region as yet. With the large number of fish farms and the generally low degree of flushing that the Clyde Region experiences where they are located there is a high probability that there will be measurable cumulative effects present already and this will only get worse with any expansion of open cage fish farms. In our opinion the 'carrying capacity' of the Clyde referred to in this Chapter is not known but we know the ecosystem is under threat and therefore the Objectives and Policies should err on the side of caution.

Objective AQUA 2: This objective needs to be stronger and again specific and measurable. Fish farm companies are investing millions in treating disease and infestation and new technologies to fight these in an open cage system while we are in a climate emergency where these issues will only worsen. The 'incident pit' of open cage fish farm management is due to them being open cage systems and their additional effect is that they deliberately pollute the Clyde Marine Region, with the co-operation of Government who are actively encouraging them to expand. COAST want to see industry monies being invested in Research and Development which transitions their industry to closed containment to ensure that the CMPP Vision can be fulfilled. To this end much clearer objectives and supporting policies are needed to help drive this investment.

Policy AQUA 1 The word 'supported' in this policy should be changed to 'permitted'.

Policy AQUA 3 'use are encouraged' should be changed to 'use are permitted'. Under this policy we also need to see incentives to stop deliberate pollution affecting the seabed and the water column. The policy needs to encourage the development of systems which trap waste and recycle it and not just encourage the use of multi-trophic systems.

Policy AQUA 4 COAST as a member of the Wrasse Working Group has particular concerns regarding the demand for wild wrasse as cleaner fish in open cage fish farms and we would like to see a policy included to aim to ensure that no wild wrasse are taken from MPAs and all other wrasse should be responsibly sourced with an accredited supply chain. In our opinion and that of the Wrasse Working Group the current voluntary code for wrasse creeling in Scotland is inadequate and does not ensure sustainability of this keystone species.

As stated under our Ch. 5 comments, it is recommended that nature conservation considerations are integrated into relevant sectoral chapters of the Clyde RMP, by the introduction of objectives and policies to ensure that certain polluting or damaging activities are not supported in or near to Nature Conservation MPAs unless it can be shown that there is no detrimental impact on marine biological diversity. **Such objectives and policies need inserting in this Chapter.** Such a policy would not affect existing activity, but rather it would be aimed at minimising additional pressure on MPAs by **establishing a presumption against authorisation.** In developing such policies, particular regard should be had to existing management advice from Scottish Natural Heritage, which has already identified certain activities whose **further expansion should be carefully controlled within MPAs, including finfish farms and shellfish farms in the Upper Loch Fyne and Loch Goil MPA^{xx} and in the South Arran MPA** where it concluded that **'the location of future developments would need careful consideration.'**^{xxi}

	<p>Ch11..Sports, Recreation & Tourism</p> <p>COAST want some specific Objectives and Policies to be included in this Chapter which relate to Recreational Sea Angling (RAS). Members of the CMPP and Clyde 2020 worked hard to ensure that the past value and potential future value of RSA were included in the CMPP Laymans' Guide cartoon animations and it is therefore currently a significant omission which needs to be rectified.</p> <p>In the near past Clyde was a world-class RSA destination for both shore and boat fishing (Radford <i>et al.</i>, 2009¹). In the 70's and 80's the Clyde hosted a variety of local and international RSA competitions including the European Cod Festival, contributing to many aspects of the local economy.</p> <p>In the 1970s, 59 charter boats operated in the Upper Clyde (Scottish Government Technical Report: Economic Impact of Recreational Sea Angling in Scotland, 2009), and 60 operated in the Lower Clyde (Tony Waas, Pers. Comms, November 2014). In that 2009 report the Clyde Sea Angling Study (CSAS) estimated that if the Clyde ecosystem improved from the effects of commercial overfishing, and the removal of the three mile limit in 1984, then the total benefit would be 370 FTEs and £17.8m in household income. Today, with three part time charter boats remaining in a damaged the Clyde has suffered a dramatic decline in investment and participation in angling resulting from the poor quality of sea angling.</p> <p>With Scotland lacking a sector plan for the tourism and economic potential of RSA nationally the CRMP is an opportunity for a recovery plan to be outlined for the Clyde here and it needs to be directly linked to the objectives and policies for Sea Fisheries in Ch 9.</p> <p>An increase in anchorages and moorings may also pose risks to seabed habitat and SNH has thus called for caution in consideration of any new proposals in the Upper Loch Fyne and Loch Goil MPA^{xxii} and the need to remove or avoid such pressures in parts of the South Arran MPA.^{xxiii} We could also include encouragement to move to initiatives like Advanced Mooring Systems which hold chains above seagrass beds and which allow them to be conserved and expand without chains dragging the seabed.</p>
3	Should the Clyde Regional Marine Plan include more spatial policy for developments, activities and sectors in the Region?
	Yes <input checked="" type="checkbox"/> please proceed to question 3a No <input type="checkbox"/> please proceed to question 4
3a	Please provide your comments here or suggest preferred locations for specific activities and/or policies:
	<ul style="list-style-type: none"> • MSP offers many potential benefits to managing competing uses of the marine environment, whilst also ensuring the delivery of key ecosystems goods and services. However, in order to achieve such results, a plan must be sufficiently detailed by 'lay[ing] out the constraints and conditions imposed on such development' and '[providing] direction for further zoning and regulations.' This is particularly true if marine plans are going to support the recovery of degraded marine ecosystems and to promote the resilience of our seas to growing threats such as climate change and ocean acidification.

	<p>The development of the Clyde RMP offers an exciting opportunity to take such steps in order to ensure that developments within the region are carried out in a sustainable manner, without undermining fragile marine ecosystems. With this in mind, the drafters of the Clyde RMP should draw lessons from international policy and best practices with a view to adopting an ambitious marine planning system. Strengthening protection for the MPA network in the Clyde RMP is one important step in this direction.</p> <ul style="list-style-type: none"> • The introduction of MSP in Scotland provides an important opportunity to bolster the network of Nature Conservation Marine Protected Areas (MPAs). According to the Marine (Scotland) Act 2010, a RMP must include ‘policies (however expressed) for and in connection with the sustainable development of the area to which the plan applies [and] policies on the contribution of Nature Conservation MPAs to the protection and enhancement of the area to which the plan applies.’^{xxiv} Thus, one would expect the MPAs to feature centrally in a RMP, with clear and precise policies to demonstrate how the plan contributes to the protection of MPAs. • Marine spatial plans must be sufficiently detailed in order to provide clear guidance to decision-makers as to how to act to achieve the objectives of the plan. • The draft Clyde RMP also does not engage with the question of how specific sectoral pressures on MPAs should be controlled in order to support the overall health of ecosystems therein. In failing to do so, the draft RMP misses the opportunities for marine planning to be used to ‘provide stronger policy protection’ to natural heritage by, among other things, ‘steer[ing] damaging activities away from sensitive features.’^{xxv} One tool to achieve this is ocean zoning, which has been described as a principal measure for effective marine spatial planning due to its ability to identify areas where particular activities should be encouraged or discouraged in order to ‘protect the natural values of the marine management area while allowing reasonable human uses of the area.’^{xxvi} Ocean zoning also provides benefits by providing clearer guidance to potential developers as to where activities may or may not be permitted.
4	Do you think there is any information that is incorrect or missing from the context section for any of the chapters?
	Specific COAST comments in the Chapter sections on the current context and back story information should be used to bolster the context for the Chapters which do lack enough information several cases. In particular, CH 1, Ch 5, Ch 9, Ch 10, and Ch 11.
5	Do you have any comments on the style, readability and formatting of this document? Please note that it is our intention to use ArcGIS to create the maps for the final Clyde Regional Marine Plan.
	Marine spatial plans must be sufficiently detailed in order to provide clear guidance to decision-makers as to how to act to achieve the objectives of the plan. Furthermore, marine spatial plans can also play an important role in public education by conveying important information about an area. ^{xxvii} These objectives are not achieved if it is necessary to cross-reference a range of other documents in order to understand the scope and substance of the policies. In this respect the plan falls short because of the amount of document cross referencing that is required in the document and the inherent lack of clarity it then brings to

	<p>decision makers and the general public</p> <p>Some specific changes have been suggested in other parts of this response.</p>
6	<p>Is there anything else you would like to add to influence development of this Clyde Regional Marine Plan?</p>
	<p>Not currently with the limited time and resources that we have available.</p>
<p>How does this Plan affect you?</p>	
<p>The Clyde Marine Planning Partnership will complete a Business and Regulatory Impact Assessment (BRIA) to assess the likely costs, benefits and risks of the proposed draft Clyde Regional Marine Plan on the public, private and third sector. Answers from question 7 will contribute towards completing the BRIA.</p>	
7	<p>Please tell us about any potential regulatory impacts (i.e. whether a proposed objective/policy affects the way your business carries out an activity/process), either positive or negative, that you think any or all of the objectives/policies in the Clyde Regional Marine Plan may have on your business.</p>
	<p>An effective plan which delivers the Vision will have a positive economic and social impact on Arran and other coastal communities around the Clyde. A healthy and productive marine ecosystem will deliver a healthy economy and healthy communities.</p>
<p>The Equality Act 2010 provides the legal framework which protects the rights of individuals and advances equality and opportunity for all. The Act protects people from discrimination on the basis of the following nine protected characteristics: age, religion and belief, race, disability, gender, sexual orientation, gender reassignment, marriage and civil partnership, and pregnancy and maternity.</p>	
8	<p>Do you believe that the Clyde Regional Marine Plan discriminates disproportionately between persons with protected characteristics?</p>
	<p>Yes <input type="checkbox"/> please proceed to question 8a No <input checked="" type="checkbox"/> Please proceed to questions 9</p>
8a	<p>If you answered yes to question 8, in what way could policy be improved to ensure that the Clyde Regional Marine Plan is not discriminatory?</p>
<p>Sustainability Appraisal and Strategic Environmental Assessment (SA-SEA)</p>	
9	<p>Do you have any comments on the following sections of the SA-SEA? If you have comments on multiple sections, please indicate which section you are referring to in the comment box below.</p>

	SA-SEA Objectives <input type="checkbox"/> Reasonable alternatives <input type="checkbox"/> Assessment of objectives and policies <input type="checkbox"/>
	<p>COAST have very little to say at the moment about this SA-SEA document as we are clear that the CRMP draft does not meet its objectives, vision and aims as it stands. COAST is likely to comment in much more detail once the next draft of the CRMP is produced. We acknowledge that is a large piece of work and the small CMPP staff are to be congratulated at compiling this draft.</p> <p>A couple of notes from COAST at this stage are as follows:</p> <ul style="list-style-type: none"> • A clear context for why the Clyde Marine Region is in the condition that it is in is needed and in our opinion this fundamentally comes down to a Government failure to manage the Marine Region sustainably over a long period of time. This has had a huge financial and social impact on the region and our coastal communities in particular and this does need to be spelled out clearly. • Cumulative and cross-sectorial effects need to be at the forefront of the assessment of the value of this CRMP and whether it is fit for purpose. This is because the challenges we face will only get harder in the future and the plan must account for these; for example: <ul style="list-style-type: none"> ○ How will the CRMP address the industry plan to double open cage fish farming by 2030 during a period of continued and accelerated warming of our seas with more frequent destructive sea lice and algal bloom events to be expected? ○ Other questions which need addressing are: How will the CRMP address powerfully the bycatch issues within the current Clyde fishery as this also needs to be assessed in the context of the legally binding target of near zero discards through the CFP Landings Obligation, which is now in effect? How will the policies of the CRMP ensure we have a sustainable fishing industry and fishing communities together with ecosystem recovery over the short, mid and long term? Will the Marine Scotland landings data be made available in a timely and accurate manner to allow the CRMP to be adapted in an effective manner?

About you (* indicates required information)																	
10	What is your name?																
	Paul Chandler																
11	What is your email address? *																
	paul@arrancoast.com																
12	Are you responding as an individual or an organisation? *																
	Individual <input type="checkbox"/> please proceed to question 17 Organisation <input checked="" type="checkbox"/> please proceed to question 16a																
12a	If responding on behalf of an organisation, please enter the organisation's name here.*																
	The Community of Arran Seabed Trust (COAST)																
13	What are your interests in the Clyde Marine Region?*																
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14	The Clyde Marine Planning Partnership would like your permission to publish your consultation response. Please indicate your publishing preference: *																
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<p><i>Information for organisations:</i> The option 'Publish response only (without name)' refers only to your name, not your organisation's name. If this option is selected, the organisation name will still be published. If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.</p>																	
15	How did you hear about the pre-consultation draft Clyde Regional Marine Plan?																
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Thank you for your response on the pre-consultation draft Clyde Regional Marine Plan. Keep up to date with the latest news from the Clyde Marine Planning Partnership by signing up for our newsletter at www.clydemarineplan.scot and following us on twitter [@clydemarineplan](https://twitter.com/clydemarineplan).

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- i Marine (Scotland) Act 2010, s. 15(1).
- ii Marine (Scotland) Act 2010, s. 15(3).
- iii UNESCO, *Marine Spatial Planning: A Step-by-Step Approach*, 72.
- iv See e.g. Nicola Sturgeon declares climate emergency at SNP conference, BBC News website, 28 April 2019; <https://www.bbc.co.uk/news/uk-scotland-scotland-politics-48077802>
- v Marine (Scotland) Act 2010, s. 5(3).
- vi UNESCO, *Marine Spatial Planning: A Step-by-Step Approach*, 75.
- vii 68.
- viii Clyde Regional Assessment.
- ix See UK Government et al, *Our Seas – A Shared Resource: High Level Marine Objectives*, 7.
- x See e.g. Nicola Sturgeon declares climate emergency at SNP conference, BBC News website, 28 April 2019; <https://www.bbc.co.uk/news/uk-scotland-scotland-politics-48077802>
- xi SNH, Marine Planning Position Statement, <https://www.nature.scot/sites/default/files/2017-10/A2357115%20-%20Marine%20Planning%20Position%20Statement.pdf> 5.
- xii UNESCO, 78.
- xiii See discussion in Strategic Environmental Assessment (2019) 51.
- xiv SNH, Management Options, 11 and 13.
- xv SNH, Management Options, 11.
- xvi SNH, Management Options, 15-16.
- xvii SNH, Management Options, 10.
- xviii National Marine Policy Statement, para. 2.3.1.6.
- xix East of England Plan, Policy ECO1. See also Draft Marine Plan for Northern Ireland (April 2018) 45.
- xx SNH, Management Options, 11 and 13.
- xxi SNH, Management Options, 11.
- xxii SNH, Management Options, 15-16.
- xxiii SNH, Management Options, 10.
- xxiv Marine (Scotland) Act 2010, s. 5(3).
- xxv SNH, Marine Planning Position Statement, <https://www.nature.scot/sites/default/files/2017-10/A2357115%20-%20Marine%20Planning%20Position%20Statement.pdf> 5.
- xxvi UNESCO, 78.
- xxvii UNESCO, *Marine Spatial Planning: A Step-by-Step Approach*, 75.