COAST response to Scottish Government consultation on Planning Position Statement for National Marine Plan 2 (NMP2) 7 February 2025

Background and purpose
The public consultation on Scotland's second National Marine Plan is open until the 28th January 2025.

Scotland adopted its first National Marine Plan in 2015, with the aim of helping to manage the use of Scotland's seas in a sustainable way. In 2022, work began to create an updated national marine plan to better reflect how the sea is currently being used, and to plan for its continued and sustainable future use. Marine planning seeks to balance the needs of people and our environment through informed and evidence-based decision making.

The Planning Position Statement (PPS) is the culmination of work to date on the development of Scotland's National Marine Plan 2 (NMP2) and consolidates stakeholder feedback, setting out the latest development of high-level objectives and policy ideas for NMP2. These are the draft outputs from engagement to date and are an early opportunity to shape the Plan.

The Plan covers Scottish territorial waters (0-12 nautical miles) and Scottish offshore waters (12-200 nautical miles) for which Scottish Ministers have planning responsibility. Regional marine plans must also conform with the NMP2.

This consultation is made up of 13 questions.

Questions:
1. Do you agree with the updated wording for the high-level objectives (HLOs) and the focus they set out for policies in the National Marine Plan 2 (NMP2)?

~~Yes /~~ No

Please state which high-level objectives (HLOs) you are referring to in your response.
The Community of Arran Seabed Trust (COAST) is a community-led charity that was established in 1995 with the aim of protecting and restoring an abundant and productive marine environment around the Isle of Arran and the wider Clyde region for the benefit of all. COAST have successfully campaigned for the establishment of Scotland's first and only No Take Zone (NTZ) in Lamlash Bay and for the designation of the South Arran Marine Protected Area (MPA) and protection of the MPA through the introduction of spatial fisheries management measures. We continue to work for recovery of marine biodiversity and marine ecosystem recovery in the seas around Arran, the Clyde and further afield in the Scotland to provide a marine environment fit for the future that can support the social, economic and wellbeing aspirations of the people of Scotland. We are a member of the Clyde Marine Planning Partnership.

General Comments in relation to the proposed HLOs in the PPS:
We welcome the acknowledgement in the Planning Position Statement (PPS) that addressing challenges in Scotland's marine space will mean taking difficult decisions as to how that marine

space is used. For too long the approach taken with marine management in Scotland has been to largely avoid difficult decisions and proceed on the basis that everything can happen everywhere, avoiding proactive intervention to remove or limit harmful activities and impacts.

The preamble to the PPS recognises significant challenges and the fact that Scotland needs to urgently do better in how it manages its sea area – that a "transformation in the use of our seas" is required.

Our view is that the proposals (objectives and policy ideas) as set out in the PPS will not support these intentions. The HLO's as proposed are a serious weakening of the existing NMP, and are not fit for purpose. They do not provide a robust and clear intention for the new national marine plan and, as currently written, will fail to provide a marine planning framework that delivers the necessary changes in decision making and action to meet the stated intentions described in the PPS (i.e. for future management and use of Scotland's marine environment that halts and reverses marine biodiversity loss and environmental degradation, addresses the climate change emergency in a meaningful way contributing to achievement of net zero, and balances uses to achieve sustainable future use of Scotland's marine space and resources).

As proposed, the HLO's and proposed policy ideas will not address key legal requirements and commitments that the Scottish Government is required to deliver (e.g. under the Marine (Scotland) Act 2010, in relation to achieving Good Environmental Status, the high-level objectives of the UK Marine Strategy, an ecosystem-based approach, marine spatial planning and legal obligations in relation to fisheries).

We are extremely concerned at the simplification and weaknesses of the proposed HLO's. While we acknowledge the importance of clarity in the HLO's, the simplification of the HLOs and removal of sector/topic specific objectives and policies actually removes clarity and reduces the strength of the stated intention of the plan.

The HLO's and policies need to be robust and require transformational change in decision making in relation to the marine environment. Without this, the new national marine plan will at the very least be ineffectual and at worse lead to further environmental degradation and overexploitation of marine resources and the marine space.

A basic starting point for NMP2 has to be that Scotland's marine environment is degraded and does not provide the natural resources (e.g. biodiversity including fish stocks, ecosystem function) that it once did, with consequent loss of jobs, economic value and social wellbeing. The HLO's and policies need to be worded so that this imbalance is corrected, ensuring that decision making supports recovery of the health of the marine environment and an effective balance of use of marine resources into the future.

We are concerned by the comments on p52 of the PPS that the Scottish Marine Assessment (SMA) 2020 "……was unable to draw conclusions about benthic habitats and underwater noise due to limitations in current knowledge." This is misleading as it fails to reference not only the

information in the SMA relating to the predicted extent of physical disturbance to seafloor indicator and the assessments showing ongoing declines in key inshore habitats such as biogenic habitats, but also Scotland's failure to achieve most of the Good Environmental Status indicators. The predicted extent of physical disturbance to seafloor indicator states that disturbance from towed bottom contact fishing activity is likely to be widespread with seafloor habitats in poor condition across more than half of the 21 marine regions and all the inshore marine regions. Specifically in relation to the Clyde marine region we refer you to the Clyde Ecosystem Review 2012 which provides a very clear view on the degraded status of fish stocks in the Clyde: https://www.gov.scot/publications/scottish-marine-freshwater-science-volume-3-number-3-clyde-ecosystem/). We ask that this is addressed in future documentation and that an accurate depiction of the state of Scotland's seas is presented using best available data.

The removal of sectoral-specific objectives and policies will seriously weaken the plan. We consider that sector-specific objectives and policies need to be included (as they are in the existing national marine plan) to provide better clarity overall and support the NMP2 in meeting its stated intention and delivery of legal commitments. Sector-specific objectives could sit within the over-arching sustainable use objective and provide clarification as to the individual sector considerations regarding NMP2.

The actions by COAST and the community on Arran to establish areas to protect and recover parts of Arran's local marine environment was prompted by the damage and degradation caused by the expansion of seabed bottom trawl and dredge fisheries in the Clyde and the resultant collapse of the Clyde sea fish stocks, loss of jobs and economy and impacts on habitats and marine life. We are particularly concerned by the removal of Sea Fisheries specific objectives and policies as this will seriously weaken fisheries management and lead to the failure of the NMP2 to support the legal obligations relating to fisheries as well as leading to greater environmental harm. While the overarching aim of fisheries management in the UK might be "….to preserve the long-term sustainable use of fisheries resources whilst minimising potential negative environmental, social or economic impacts" we assert that it has failed to deliver this to date, with the failure to achieve Good Environmental Status indicators, the failure to deliver obligations under the UK Fisheries Act and the findings of the Clyde Ecosystem Review being just a few examples of this.

The proposed HLO wording needs to be modified to provide HLOs that clearly set out the requirement of NMP2 to deliver key legal obligations (such as achievement of Good Environmental Status, delivery of the UK Marine Strategy, and requirements of the Marine Spatial Planning Directive). As currently presented, the proposed objectives fail to meet the requirements of the Marine (Scotland) Act 2010 (Part 3, S4(4)(a)). We consider that the wording of the HLO's overall needs to be improved and strengthened and that specific sectoral topic area objectives and policies, as exist in the current marine plan, need to be included and are enforceable.

Comments regarding specific HLO's:

Nature HLO: Protect and enhance Scotland's marine nature to support functioning and resilient ecosystems.

The nature HLO needs to be reworded to provide a much more robust objective that clearly recognises the urgent need to recover the health of Scotland's marine environment.

Use of the word 'nature' is unclear. The objective should refer to marine biodiversity and include specific reference to seabed habitats and healthy ecosystem function and resilience.

The wording is misleading - The requirement to improve nature is not just to support functioning and resilient ecosystems. Also, the wording misses the point that it is not just nature that determines the health of marine ecosystems as there are other influences that are also integral to ecosystem function. The objective needs to identify the need to regenerate healthy ecosystem function and ecosystem resilience.

There needs to be specific reference in the objective to recovering the health of the marine environment from its current degraded state. Use of the word 'enhance' does not provide this clarity. Given the lack of an agreed definition for some terms that are used for environmental regeneration we consider that the wording of the objective needs to be modified accordingly and that the objective is strengthened and clarified to: "protect, recover, restore and enhance Scotland's marine biodiversity, marine habitats and healthy and resilient marine ecosystems". It is important that terms used in the objectives are clearly defined.

There are other requirements that need to be clearly stated in the HLO and policies that are already set out in the wording of General Objective 9 (Natural Heritage) in the existing marine plan, i.e. being clear that development and use of the marine environment needs to deliver the objective, must comply with legal requirements for protected areas, habitats and species and protect the health of the marine area.

In relation to recovery, restoration and enhancement of marine biodiversity and ecosystem function, clarification is required as to how progress will be measured and the baseline used, being clear that the starting point is a degraded marine environment and being informed by knowledge of what the marine environment used to support in terms of biodiversity.

Sustainable marine economy HLO: Support sustainable economic development and use of Scotland's seas

The wording of this objective is far too weak to provide anything meaningful as an over-arching objective. There needs to be a very clear definition of what 'sustainable use' means both in relation to specific activities but also the overall balance of use of Scotland's marine space. We know that current use continues to exacerbate past environmental degradation and is clearly not sustainable in terms of the health of the marine environment. There needs to be a clearer link between the need for healthy marine ecosystems to support many uses of the marine environment.

Specific reference to requiring an ecosystem-based approach and use of the descriptors of Good Environmental Status as part of sustainability assessment of different uses needs to be part of the HLOs to provide greater clarity as to what is meant by sustainable whilst also helping embed legal obligations within the objectives.

The HLO relating to use of the marine space should include specific reference to marine uses benefitting coastal communities, possibly linking this objective to community wealth building and the role of communities in shaping the use of their local sea areas.

Implementation HLO: Enable consistent and transparent decision-making to ensure sustainable use of Scotland's seas.
There needs to be specific reference to evidence-based decision making in this objective as well as identifying the requirement for monitoring the condition of Scotland's seas and the impact of human activities.

2. Please add any additional comments on the high-level objectives (HLOs) in the space provided below.
The proposed objectives as presented fail to meet the requirements of the Marine (Scotland) Act 2010 (Part 3, S4(4)(a)) which requires, amongst other things for a national marine plan to set marine ecosystem objectives.

There is a requirement for the HLO's to set out the requirement for an ecosystem-based approach and achievement of GES through the NMP2 within a specific time frame, ensuring that development in, and use of the marine environment does not compromise the achievement or maintenance of GES in relation to Scottish waters and as a contribution for the UK as a whole.

We are extremely concerned to see the statement that zonal planning for fisheries in NMP2 is not currently appropriate – spatial management is a globally-accepted tool to balance resource use and impacts and support recovery and maintenance of marine ecosystems, habitats and species. Spatial planning is a requirement of the Marine Spatial Planning Directive and should be an integral aspect of the NMP2 both generally and in relation to consideration of all sectoral activities. The UK Marine Policy Statement requires marine plans to provide, amongst other things, a spatial expression of policy, implementation and delivery.

3. What are your views on the policy ideas proposed under the 'Climate Change Mitigation and Adaptation' section? (Section 5.1)
We welcome the intention to give significant weight to the climate and nature crises within NMP2 policies. However, the proposed wording from NPF4 needs amending to provide improved clarity and to strengthen climate-related policies and ensure similar consideration of the biodiversity crisis. Policies need to refer to addressing these issues e.g. "giving significant weight to addressing the climate and nature and biodiversity crises."

The term 'significant' needs to be defined to enable a more quantified approach to be taken.

In the absence of adequate scientific information regarding a development or use, a precautionary approach must be taken by decision-makers. This should be an over-arching requirement of the plan as a whole.

The importance of marine habitats in providing opportunities for climate change mitigation through the capture and long-term storage of carbon needs to be properly recognised. There is now a considerable amount of evidence to inform and support policies to improve protection and recovery of such ‘blue carbon’ habitats, as well as identifying the impact of different marine activities on these habitats.

There needs to be a policy requiring developments and activities to demonstrate how climate change mitigation and adaptation are being addressed with an emphasis on the use of nature-based solutions as a priority.

In relation to climate change design, siting and decarbonisation there should be a requirement for developments and activities to identify their interactions with blue carbon stores and to demonstrate how they are protecting or avoiding these essential habitats.

4. What are your views on the policy ideas proposed under the 'Nature' section of the Planning Position Statement (PPS)? (Section 5.2)
We support the concept of policy that encourages nature positive developments and nature-inclusive design and enabling space for nature. For example, developments should be obliged to move away from polluting practices and activities that have a direct impact on essential habitats.

We consider that NMP2 ‘nature’ policies need to support marine environmental recovery including habitats, species and healthy ecosystem function and ecosystem resilience; there is very little addressing the need for policies to reverse past impacts and biodiversity loss. ‘Nature’ needs to be defined as encompassing marine biodiversity, habitats and ecosystem function.

There needs to be a clear requirement for effective consideration of cumulative impacts with appropriate policies to prevent environmental harm.

In the absence of adequate scientific information regarding a development or use, a precautionary approach must be taken by decision-makers. This should be an over-arching requirement of the plan as a whole as well as in relation to all policies.

Supporting Marine protection and enhancement:
Support in the NMP2 policies for a whole site, ecosystem-based approach to MPA management is required using a spatial-mapping approach to inform decision-making. There is ample

evidence demonstrating that ecosystem-based approaches can deliver greater biodiversity, ecosystem, social and economic benefits.

We welcome the commitment to consult on and introduce fisheries management measures for existing MPAs where management is required but not already in place as this is already long overdue.

The Nature section of the PPS needs to be expanded beyond a focus on MPAs and PMFs. While both MPAs and PMFs are important considerations in relation to addressing biodiversity loss and do require specific policy focus, there need to be policies relating to protection, recovery, restoration, enhancement of other ecologically and biologically important elements of the marine environment such as essential nursery habitats for fish and shellfish and wider ecosystem function and resilience.

We would like to see clear recognition of commercially important fish and shellfish species as an integral component of nature/biodiversity.

We support the proposal for a policy that preserves restoration and enhancement sites from wider activity that may have an adverse impact on the site. Clarity is needed on the use of the terms used in all policies. Restoration should encompass both what tends to be called 'active' and 'passive' restoration – i.e. all interventions to support regeneration/recovery of biodiversity, seabed habitat condition and ecosystem function and resilience. Clarity is needed as to what is meant by 'enhancement'.

A requirement for detailed spatial plans to support nature positive and nature inclusive decision-making should be included.

Priority Marine Features
Protection of PMFs is needed, but this needs to be strengthened to provide more specific thresholds for protection. The current focus on impact on national status of a PMF allows for widespread damage to and loss of PMFs. Given the biodiversity crisis and past impacts there should be presumption against allowing impact to or loss of a PMF.

Reference to 'available data' throughout the NMP2 should refer to 'best available data'

Nature inclusive design
We support the proposal that NMP2 requires development and uses to be nature-inclusive, following design practices and delivering the best outcomes for nature. This should encompass 'nature' in the broadest sense of biodiversity, habitats and ecosystems with priority on 'nature positive' rather than just 'nature inclusive' requirements.

5. Considering the definition of 'Nature Positive' below, what are your views on how this could be implemented by different sectors, types of development and use?
Definition of 'Nature Positive' in the Scottish Biodiversity Strategy (SBS):

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

Nature positive developments and uses need to be prioritised and developments and uses causing damage, degradation or loss of nature (biodiversity, habitats and ecosystems) need to be removed, modified or avoided.

As commented elsewhere, the definition of 'nature' needs to be clarified and should encompass biodiversity, supporting habitat (all structural and functional aspects) and ecosystem function and resilience.

In the absence of adequate scientific information regarding a development or use causing irreversible or serious environmental damage, a precautionary approach must be taken by decision-makers.

Nature positive activities need to deliver net positive nature gain that will be sustained in the long-term with appropriate safeguards in place. Clarity and definition are required to ensure that 'nature positive' delivers ecologically-robust gain. Clarification is required as to how biodiversity gain will be measured.

6. What are your views on both the cross-sector, and sector-specific policy ideas proposed under the 'Sustainable Marine Economy' section?
Cross sector (Section 5.3)
While we support the principle of promoting co-existence and any associated co-location, cross-sector policies alone will not effectively address the requirements to balance uses of and developments in the marine environment whilst also supporting recovery of the health of the marine environment. Aspirations for cooperation to achieve the vision for Scotland's seas have not worked to date and are unlikely to do so in the future without application of spatial or zonal marine planning approaches and clear sector-specific policies.

The proposal to only include cross-sector policies will very seriously undermine the plan and we strongly object to this proposal.

Sector specific objectives and policies are needed to provide the detail necessary to encompass the varying impacts that specific sectors can have on the marine environment. Specific policies for all marine sectors and area uses would provide improved alignment with NPF4 which includes these requirements (for sectors and land uses).

Use of spatial or zonal planning approaches is needed if a balance of uses in relation to available space, resources and requirement to recover biodiversity and marine ecosystem function and resilience is to be achieved. We would like to see the role of local communities in decision making highlighted here.

Spatial planning at a national and regional level is essential to support and enable co-existence. There are already concerns about the competing use of the marine space and this can only be addressed by use of a comprehensive spatial planning approach and mapping of constraints and opportunities that would support decision-making at a national and local level. Where sectoral opportunities are identified there still needs to be a requirement of assessment of proposals including consideration of cumulative impacts before development is approved to proceed, rather than a blanket presumption in favour development.

We consider that regional marine planning could provide an effective, and more inclusive approach for delivering marine planning requirements and the required balancing of use and recovering the health of the marine environment at a more localised geographical scale. We consider that the NMP2 should make a specific connection to regional marine planning in this regard.

There needs to be a clear requirement for effective consideration of cumulative impacts both within and between sectors in relation to developments and activities. Cumulative impacts are poorly addressed currently and policy in NMP2 needs to address this, improving on the policy in the existing marine plan and linking to the need for a precautionary approach where evidence is limited.

Reference to 'sustainable marine economy' needs to be broadened to encompass not only commercial and industrial interests but also the inherent value of marine biodiversity, habitats and ecosystems and the economic, social and wellbeing value of other activities and uses related to the marine environment. The 'Natural Capital Approach' is integral to the 'Blue Economy Vision' and should be mirrored in NMP2.

Comments in relation to specific sectors:

Fisheries:

There is a considerable body of evidence that exists documenting the interaction of different fishing activities on the marine environment and in particular on the impacts of towed bottom trawl and dredge fisheries on seabed habitats, marine life, essential fish habitats and ecosystem function.

We do not support the proposal to not have sector-specific objectives for sea fisheries. Fisheries sector policies are essential to address past and current impacts and to support recovery of marine biodiversity that will provide future fisheries opportunities and support sustainable fishing activity. Sectoral fisheries policies must be included in NMP2 and at the very least need to replicate those present in the current national marine plan and preferably strengthen them.

The statement that "Zonal planning for fisheries in NMP2 is not currently appropriate" is incomprehensible and not justified given past impacts of fisheries, failure to meet or deliver commitments and legal duties relating to fisheries and the findings of SMA2020. Spatial

planning for fisheries is not only justified it is urgently needed and a requirement to deliver this must be included in NMP2. Evidence from research in the Lamlash Bay No Take Zone and South Arran Marine Protected Area demonstrate how spatial/zonal fisheries measures have supported improvements in certain shellfish populations that are providing benefits to lower-impact hand collection fisheries.

Fisheries policies are required to identify how NMP2 will address the past and current impact of fisheries on the health of the marine environment but also of sectors within the fishing industry (such as trawl and dredge fishing) on other fisheries sectors (such as creel fisheries, hand diving and also recreational sea angling which in itself has provided significant economic and social benefits but been serious undermined by the impact on fish stocks from past mis-management of fisheries).

NMP2 needs to provide a clear direction in relation to supporting a just transition away from widespread use of the most impacting fishing methods.

Aquaculture
Sector specific proposals for aquaculture must be included in NMP2 addressing the requirement for the environmental impacts of the open nets used by finfish farmers to be reduced and a transition away from their use altogether within a specific timeframe. Policies need to enable effective enforcement measures for farms with persistent high mortality or where environmental licence conditions and standards are not met. Spatial planning for Aquaculture is also needed through NMP2.

7. What are your views on the definitions being proposed for 'co-existence' and 'co-location' as set out below?
As proposed the statements lack any measure of whether co-existence or co-location is positive in relation to achieving the intentions of the NMP and delivering legal obligations. The statements lack any indication of the nature or severity of impact such that by simply supporting co-existence or co-location this could be seen as positive, failing to address conflicts and cumulative impacts.

Please provide any alternative suggestions.
No additional comments provided

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

Suggestion: *No option selected*

Please include any suggestions and/or changes, stating which policy you are referring to.
Changes to update the management of pressures policy proposals should strengthen and clarify the language used in the current national marine plan. Improved guidance is required. The management of pressure policy proposals need to include specific reference to:

- The need to reduce the amount of pollution discharged into the sea. This should apply across all sectors.
- Application of the precautionary principle in situations where evidence is limited or poor
- The widespread nature of fisheries impacts on the seabed and marine species
- Climate change exacerbated by human activity

Pressures should not be ignored just because they are current difficult to measure or assess.

9. What are your views on the policy ideas proposed under the 'Accessibility and Wellbeing' section? (Section 5.6)
It is not just the marine economy that provides vital social benefits to Scotland's communities and supports social wellbeing. It is the overall health of the marine system and its resources and the underpinning fabric that provides and sustains the vital benefits, whether economic, social, cultural, health, wellbeing and spiritual; these are inherent aspects of the overall marine economy underpinned by the health of the supporting environmental system. Policies in NMP2 should identify and address these values but bearing in mind that they have the potential for negative, unwanted environmental impact.

The important role played by communities in decision making, knowledge sharing, data collection, marine protection, restoration and recovery activities should be acknowledged in NMP2. The role of communities (collectively and individuals within communities) as valid stakeholders in marine decision-making and marine ecosystem recovery needs to be clearly acknowledged in NMP2 and how they will be supported to input to decision-making about their local marine area. This should not just apply to island and coastal communities. Many aspects of the marine environment are public, such as fisheries, and the valid stake of people not specifically part of an island or coastal community need to be recognised.

We support the proposal for inclusion of a policy requiring consideration of potential impacts on landscape/seascape qualities or character and visual amenity in decision-making. This should include consideration of subtidal landscape and geo-heritage and geo-diversity aspects as well. There is a significant connection between seascape / landscape and wellbeing.

10. What are your views on the proposed policy ideas under the 'Implementation' section?

Please consider the role of the decision-maker and the potential introduction of prioritisation when responding. (Section 5.7)
It is important that this section provides a clear recognition of the need to recover/regenerate the health of the marine environment and that the policies are set against the backdrop of a degraded marine system. There needs to be an emphasis on the need to improve the condition/health of Scotland's marine environment in order that it can support future, sustainable human use.

As we have commented elsewhere, there is a very clear need for a full spatial plan developed for all sectors, uses and nature for the Scottish Marine Area. There needs to be a requirement for the best available evidence to be used both in the development of spatial plans as well as in decision-making relating to NMP2, with recognition that the spatial plan can be improved as new information is gained. An excuse of insufficient data should not be used to delay development of a spatial plan. Application of the precautionary approach must be a necessary and integral component of the plan.

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

11. If you agree that National Marine Plan 2 (NMP2) should include prioritisation: which outcome do you prefer i.e. space for a specific use given priority, space for nature given priority?
We are not clear on the intention of the proposed prioritisations in decision-making as set out in the PPS. There is a clear need to address past and ongoing impacts on and degradation of the marine environment and rebalance negative impacts and overuse. There is an inherent link between achieving sustainable use and recovering the health of Scotland's seas and establishing a viable balance between future use and marine environmental health that does not compromise current and future generations. To this end we support significant weight being given to the global and nature crises when considering marine decisions and that relative weighting is a matter of judgement for individual decision-makers and the NMP2, (providing NMP2 has objectives and policies fit for purpose). We acknowledge the benefits of aligning NMP2 with NMP4.

We do not support a presumption in favour of sectoral use of mapped resources within an adopted sectoral marine plan without further consideration and assessment.

Should additional outcomes also be considered?
No further comments provided.

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

Suggestions:

We are unclear as to the policy ideas that are being proposed here.

Community participation in informed decision-making needs to be developed beyond just the traditional consultation-style processes that are most prevalent in current arrangements. NMP2 could support development of guidance to enable this including approaches and mechanisms to gather and use community knowledge and experience.

There is a need for co-development of guidance by decision-makers with communities to ensure and enable active participation in decision-making.

13. Do you think the policy ideas in the National Marine Plan 2 (NMP2) will impact, either positively or negatively on any of the following: Marine sectors/businesses, consenting authorities, local authorities or any other planning decision makers?
In responding to the questions below it may be helpful to consider the potential implications on international or national competitiveness and Scotland as a destination for global investment.

No comment provided