



National Oceanography Centre

NATURAL ENVIRONMENT RESEARCH COUNCIL

UK Marine Policy Statement: A draft for consultation
Response from National Oceanography Centre
October 2010

Introduction

The National Oceanography Centre in conjunction with members of the UK Marine scientific research community welcomes the opportunity to respond to this consultation. Views were obtained by circulating the links to the Defra consultation across all staff and postgraduate students at our laboratories in Southampton and Liverpool, and discussion with colleagues at other locations.

Summary of Consultation Questions

1. Does chapter 1 clearly explain the purpose and scope of the MPS and how it interacts with existing and emerging planning systems?

- 1.1 This section clearly states who the 'marine plan authorities' are, and that Marine Plans will set out how the Marine Policy Statement (MPS) will be implemented in specific areas. The section is also clear that Marine Plans must be prepared for all parts of regions where the MPS governs marine planning.
- 1.2 The importance of the UK-wide marine evidence base collected through monitoring programmes under the UK Marine Monitoring and Assessment Strategy (UKMMAS) is emphasized, along with the Marine Science Co-ordination Committee's role in providing a platform to address the research necessary to fill gaps in knowledge.
- 1.3 This section clearly states how the marine planning system will interact with existing and emerging planning systems following the Planning Act 2008. It mentions the planning overlap where Marine Plan boundaries extend to the level of mean high water spring tides whereas Terrestrial Plans extend to mean low water spring tides, and indicates that this is a deliberate policy to ensure joint working between the planning regimes. Integrated Coastal Zone Management is mentioned, but no indication is given about whether or how terrestrial and marine planners will be organized or coordinated so that smooth interaction takes place.

Conclusion – Chapter 1 does clearly explain the purpose and scope of the MPS and how it will interact with the existing and emerging planning systems. The MMO has a role focussed on balancing productivity and the environment whereas Natural England is a conservation body, so each has a different – and complimentary – emphasis.

2. *Does chapter 2 clearly state the vision and how it will be achieved? Are the high-level principles and environmental, social and economic considerations to be taken into account in marine planning clearly expressed?*

2.1 The UK vision for 'clean, healthy, safe, productive and biologically diverse oceans and seas' is clearly stated and 'Box 1' shows how the high level marine objectives set out the broad outcomes for the marine area in achieving this vision. The importance of a sustainable marine economy is set out, showing that businesses have a legitimate right to operate in the marine environment.

2.2-3 Whilst stating the importance of basing Marine Plans on a sound evidence base, the text suggests that if evidence is inconclusive, 'decision makers need to apply precaution within an overall risk-based approach' but it does not suggest that decision makers or stakeholders ought to invest in new scientific observations to address the lack of evidence. We welcome the view that advances in scientific knowledge or technology may render existing policy documents as out of date. The importance of cumulative impact is addressed, and the statement that 'the level of assessment undertaken for any project should be proportionate to the scale and impact of the project' is sensible. We welcome the MMO's appointment of a respected and experienced member of the UK Marine Scientific Research community as MMO chief Scientific Advisor.

2.4-5 Benefits and adverse effects in marine planning are addressed and the importance of economic and social consequences identified. The renewable energy sector is mentioned as well as wider cultural heritage.

2.6-7 Sections on environment, marine ecology and diversity are detailed. The Marine Strategy Framework Directive and Water Framework Directive are mentioned as well as the need to work with other States in the North-East Atlantic region. Under 'issues for consideration' the opportunities to build-in features beneficial to marine ecology, biodiversity and geodiversity when designing offshore structures are included.

2.8 This section addresses marine noise issues and correctly states that knowledge of the extent of impacts is limited. It includes the important point that cumulative effects may be significant.

2.9 The historic environment sections goes into a helpful level of detail.

2.10-11 These are detailed sections on climate change adaptation, coastal change and flooding including the need to draw on Shoreline Management Plans and the need for developments to be safe over their planned lifetime.

2.12-13 Air quality and seascape issues are addressed, including the importance of liaison with terrestrial planning authorities.

2.14 The section on ecological and chemical water quality and resources could possibly be integrated into sections 2.6, 2.7 and 2.12?

Conclusion – Chapter 2 clearly states the vision and how it will be achieved. The high level principles and environmental, social and economic considerations are taken into account and clearly expressed.

3. *Does chapter 3 provide a clear statement of policy objectives for the marine environment? Are the key impacts, pressures and issues for consideration in marine planning appropriately identified?*

3.1 This section clearly states the policy objectives for Marine Protected Areas and Marine Conservation Zones. The difference – if any – between a Marine Protected Area and a Marine Conservation Zone is not obvious and both terms are used throughout the section. Is it simply that MCZ is used in England, Wales and Northern Ireland and MPA is used in Scotland?

3.2 Defence needs are clearly shown.

3.3 This section has lots of detail about energy production and infrastructure development including aspects relating to the move towards low carbon energy production, offshore oil and gas supply infrastructure and storage, offshore electricity networks (the ‘ring main’ concept) and carbon dioxide geological storage.

3.4 Ports and shipping section is detailed and mentions the importance of compliance with international law – which would include Freedom of Navigation/Rights of Innocent Passage which may be impacted by certain offshore installations such as wind farms. Future Port developments may also need to be considered vis-à-vis navigational/draft restrictions placed by the development of offshore tidal stream or current capture devices, or larger structures such as the proposed Severn or Liverpool Bay barrages. The national need for clean energy may compete with the interest in allowing a particular upstream port to freely develop and expand.

3.5-7 The subject of marine aggregates receives good coverage. Marine dredging and disposal are mentioned, and the growing importance of marine cabling also included. It is true that cables are subject to damage even though they are buried, with most damage caused by trawling activities or anchors.

3.8 Inappropriate (through choice of gear) or over-intensive fishing activity undertaken outside of an otherwise coherent ecosystem-based management system can severely impact on the success of the management effort. Until the Common Fisheries Policy is reformed along sustainable ecosystem management lines the exemptions from planning control enjoyed by EU fishing vessels in UK waters will render key aspects of planning such as Marine Conservation Zones or Marine Protected Areas far less effective than they could be. Without reform it will be very difficult to

demonstrate “Good Environmental Status” under the Marine Strategy Framework Directive.

Much of 3.8 is only workable if CFP reform is not blocked by vested interests. Given the poor track record of successful implementation of measures such as sustainable catch limits based on scientific advice in the fisheries sector, the UK should develop a ‘Plan B’ in case of the failure to achieve CFP reform.

3.9 The aquaculture section could mention future development of deepwater finfish production using ‘marine ranching’ techniques using moored cages. These are in the early stages of development but could lead to large-scale offshore fish production in the future.

3.10 The section on waste water treatment and disposal mentions the overlaps with the Water Framework Directive, and other regulations such as the Shellfish Waters Directive and Revised Bathing Water Directive.

3.11 Helpful section on tourism and recreation.

Conclusion – Chapter 3 does provide a clear statement of policy objectives and the key impacts, pressures and issues are identified.

4. Do you agree with the findings of the AoS?

The Appraisal of Sustainability is detailed and covers all of the relevant issues. The exception is that without Common Fisheries Policy reform the optimal operation of the UK Marine Policy Statement will be unable to deliver ecosystem-based sustainable fisheries management outside of coastal territorial waters.

5. Do you think there are any areas in the AoS which have not been reflected properly in the MPS?

No

6. Do you have any comments on any aspect of the AoS not covered by the previous questions?

No

7. Do you have any comments on the HRA?

No

8. Do you have any comments on the EqIA screening?

No

9. Do you have any comments on the IA and does it fairly represent the draft MPS?

It fairly represents the draft MPS.

This response prepared by
Stephen Hall *CSci CMarSci FIMarEST*
National Marine Coordination Office
National Oceanography Centre
European Way
Southampton SO14 3ZH
sph@noc.ac.uk