

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

Give us your views – Begin consultation

By taking part, you give us permission to analyse and include your response in our results. To find out how we handle your personal data, please see our privacy notice which can be found here:

<https://www.clydemarineplan.scot/privacynoticeandcookies/>.

When completed, please return to:

info@clydemarineplan.scot

or

Clyde Marine Planning Partnership

Caspian House

Marine Court

Clydebank Business Park

Clydebank, G81 2NR

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?

The overall vision is very sound and a very welcome development.

Our main observation is that a number of caveats that are included in the aims water down the ambition of the plan to have the highest standards. At the consultation we learned that the Plan is advisory but will be important in shaping thinking – planners and developers should be working from the highest principles and explicitly justifying / explaining their decision making and actions if they will negatively impact on the health and wellbeing of the Clyde region. We would like to suggest the following amendments:

- We want to see a **'safe and sustainable'** framework rather than just 'sustainable' development
- All activity should be held to account to enhance the health of the marine region – addition of 'and where appropriate' allows a classic get out clause – who decides what and when it is 'appropriate', we want this to be amended to **'maintain and enhance the health of the Clyde Marine Region'**
- We want the regional plan to ensure that Priority Marine Features and SSSIs are fully protected - we would want to see the word 'significantly' removed as indicated from following aim: **'Ensure that activities and development protect SSSIs and do not significantly impact Priority Marine Features'**
- The plan should be proactive in positively encouraging Marine Protected Areas- we would suggest the following addition: 'Ensure that the Marine Protected Area network contributes to the protection and enhancement of the region, and identify opportunities for environmental enhancement and **promote growth of the network.**
- We want the framework to hold the highest ambitions to 'Support delivery of **Excellent** Environmental Status' rather than the limited ambition of 'good'

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.

Aims:

- 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.

Guiding principles:

- (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 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.

Climate change	Yes <input type="checkbox"/> No <input type="checkbox"/>	Sea fisheries	Yes <input type="checkbox"/> No <input type="checkbox"/>
Historic environment	Yes <input type="checkbox"/> No <input type="checkbox"/>	Aquaculture	Yes <input type="checkbox"/> No <input type="checkbox"/>
Landscape/seascape	Yes <input type="checkbox"/> No <input type="checkbox"/>	Sports, recreation & tourism	Yes <input type="checkbox"/> No <input type="checkbox"/>
Coastal processes	Yes <input type="checkbox"/> No <input type="checkbox"/>	Shipping, ports, harbours & ferries	Yes <input type="checkbox"/> No <input type="checkbox"/>
Natural heritage	Yes <input type="checkbox"/> No <input type="checkbox"/>	Defence	Yes <input type="checkbox"/> No <input type="checkbox"/>
Non-native species	Yes <input type="checkbox"/> No <input type="checkbox"/>	Energy, subsea cables & pipelines	Yes <input type="checkbox"/> No <input type="checkbox"/>
Marine litter	Yes <input type="checkbox"/> No <input type="checkbox"/>	Marine aggregates	Yes <input type="checkbox"/> No <input type="checkbox"/>
All sectors – general policy	Yes <input type="checkbox"/> No <input type="checkbox"/>		

The Friends of the Firth of Clyde are a community group based in the coastal village of Fairlie, along with Millport, we are the closest community to the proposed Hunterston PARC.

We have on-going first hand experience through the proposals for Peel Ports to bring Oil Rig and Large Marine Vessel Decommissioning to Hunterston PARC that highlights how vulnerable the Clyde Region can be to commercial developers when large scale projects with whole system systemic impacts are not fully scrutinised by a fully joined up planning and regulatory system.

It is good to see all of the above chapters included in the plan – a number of which have been raised by us about the impact of the decommissioning proposals.

The question is how will the plan in the case of complex projects ensure scrutiny of all these areas as a whole, so that the systemic impact of large scale plans, such as Hunterston PARC, are considered as a whole rather than enabling a ‘salami slicing’ approach that makes it easier for planners and developers to side step assessment of the overall environmental impact and, as in the case of Hunterston, avoid the statutory requirement for an Environmental Impact Assessment of the project as a whole.

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:
	<p>The recent launch of the Hunterston PARC 20 Year Plan is the largest single proposal for development in the Clyde Region and should be considered as a specific development subject to and scrutinised by spatial policy.</p> <p>The Plan includes 8 different activities – each of which may have significant impacts on the communities surrounding Hunterston and the wider Clyde region. They are:</p> <ol style="list-style-type: none"> 1. Liquid Natural Gas Storage (LNG) 2. Combined Cycle Gas Turbine Power Station (CCGT) 3. Train Manufacturing 4. Modular Manufacturing 5. Concrete Batching 6. Marine Construction and Decommissioning – This refers to oil-rig decommissioning which requires the dredging of Southannan Sands Site of Special Scientific Interest (SSSI), for which no Environmental Impact Assessment (EIA) has been undertaken. We have secured the services of an environmental QC and are actively involved in holding the regulatory and planning authorities to require an EIA of the project as a whole. 7. Aquaculture 8. Plastics recycling and storage
4	Do you think there is any information that is incorrect or missing from the context section for any of the chapters?
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.
	The plan is well presented and comprehensible. To ensure as wide access as possible it would be useful to provide a summary version and undertake a readability tests of all materials.
6	Is there anything else you would like to add to influence development of this Clyde Regional Marine Plan?
	<p>1. Hunterston PARC 20 Year Plan needs its own chapter which includes a narrative assessment of the safety and sustainability of the proposals separately and as a whole, including:</p> <p>(i) Assessing the Environmental Impact of Large Scale and Complex Development Proposals, at Hunterston PARC including Decommissioning of Oil Rigs & Marine Structures, Storage of Liquid Natural Gas (LNG) and a Gas Fired Power Station. The Clyde Regional Marine Plan clearly identifies Hunterston Peninsula as being the</p>

	<p>location of Southannan Sands Site of Special Scientific Interest (SSSI), which is a rare Natural Carbon Sink, and an Active Shell Fish Site populated by a number of Ospar Protected Species, how will these be protected? And what are the health and safety risks to the community of proposals for LNG storage facility with massive storage capacity?</p> <p>(ii) Ensuring that mitigation is not deployed at Hunterston PARC as a proxy by which to avoid the requirement for full and independent Environmental Impact Assessment (EIA) of single elements such as the decommissioning proposals and the combined elements of the project as a whole.</p> <p>(iii) Balancing Business Against Environmental Conflicts of Interest – Being explicit about how the Clyde Regional Marine Plan will ensure effective systems are in place to monitor and manage potential conflicts of interest where business and statutory powers have potential to be in direct competition with environmental safeguarding? Clydeport Operations Ltd, which is part of the much larger Peel Group of which peel Ports is a part, is the Statutory Harbour Authority for the Firth of Clyde. This means as an organisation with wide commercial interests, Peel Ports has decision-making powers over a number of marine activities in the Firth of Clyde, such as allowing oilrigs for decommissioning to be cold stacked in environmentally sensitive locations such as Loch Striven.</p> <p>(iv) Reducing the Volume of Litter Entering the Marine Environment - The Clyde Regional Marine Plan states that marine litter is found across the Clyde Marine Region with shallow coastal areas exposed to prevailing south-westerly winds being particularly at risk of becoming litter congregation areas or 'sinks'. Hunterston PARC poses a significant risk in terms of litter and waste. (i) Evidence from the Waste Management Licence Application submitted by Clyde/Peel Ports to SEPA for oil rig decommissioning at Hunterston PARC shows that unprecedented volumes of scrap metal, asbestos, NORM, organic marine matter and a range of other toxic & high risk materials will be brought to the site. (ii) The 20 Year Plan contains the proposal for a large scale plastics recycling and storage facility. It is well known that we are on the brink of an environmental crisis caused by global disruption to waste plastics caused by China abruptly halting receipt of the vast amount of plastic waste from around the world, including the UK. This has led to problems with badly regulated and illegal waste dumps springing up by ports around the world. How prepared are the Clyde Region planning and regulatory authorities to make sure that proposals for plastics recycling facilities at Hunterston PARC are environmentally safe and sustainable - rather than becoming a dumping ground for plastic waste that cannot be recycled once it arrives on land? The coastal village of Fairlie is exposed to the prevailing winds that come from the direction of Hunterston, as such its shores are at risk of becoming a 'sink' for litter and potentially toxic waste that arises as a result of decommissioning activity. How will the plan ensure planners and licensing authorities fully and transparently assess these risks and reassure the local communities that the condition of the shoreline and health of residents will not be put at risk by any decommissioning developments.</p> <p>(v) Protecting Tourism and Recreation Industries against the Impact of Industrial Development - The Firth of Clyde is internationally known for its unique sailing waters and beautiful coastal waters, as such tourism makes a significant contribution to the economy of the region. What is the Clyde Regional Marine Plan's policy on ensuring</p>
--	--

	mechanisms are in place to ensure realistic and comprehensive assessments of the economic impact of proposals for the large scale industrial developments are Hunterston PARC are undertaken
How does this Plan affect you?	
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.	
7	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>We have a significant stake as residents of the coastal community of Fairlie and the surrounding area that, with Millport, is closest to proposals for developments at Hunterston PARC which are the largest scale industrial developments proposed for the Clyde region for a number of decades.</p> <p>We have first hand experience of significant and serious flaws in the application of planning processes and collaboration between regulatory authorities. This has led to the situation where proposals put forward for oil-rig decommissioning to be brought to Hunterston PARC have been waved through by North Ayrshire Council without the requirement of an Environmental Impact Assessment. Through local campaigning and research we have managed to throw a spot light on these proposals and which we hope has helped the authorities reflect upon what is happening before rushing to grant permissions having been swayed by promises of inflated estimates of jobs for the region.</p> <p>Our experience as local residents of trying to get information about plans and to be involved in decision making has led us to the conclusion that the current systems mitigate against public involvement in assessing risks and impacts to local communities of large scale developments such as Hunterston PARC.</p> <p>We wish for Hunterston PARC to be fully and transparently scrutinised under the Clyde Regional Marine Plan.</p>
The Equality Act 2010 provides the legal framework that 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.	
8	Do you believe that the Clyde Regional Marine Plan discriminates disproportionately between persons with protected characteristics?
	Yes <input type="checkbox"/> please proceed to question 8a No <input checked="" type="checkbox"/> Please proceed to questions 9
8a	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?

Sustainability Appraisal and Strategic Environmental Assessment (SA-SEA)	
9	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.
	SA-SEA Objectives <input type="checkbox"/> Reasonable alternatives <input type="checkbox"/> Assessment of objectives and policies <input type="checkbox"/>
	<p>The SA-SEA objectives are good and if effectively employed would be a positive step towards ensuring a safe and sustainable future for the Clyde.</p> <p>Maintaining and enhancing natural Carbon Sinks and protecting active Shell Fish Sites ad Protected Marine Features are of particular concern to our local community in light of the threats posed by developments at Hunterston PARC.</p> <p>There are two additional elements that we feel are significantly lacking from the plan:</p> <p>(i) Meaningful Public & Community Involvement - Those communities who will be most affected by planning decisions should play a part in the decision making process. For far too long we have seen legislation requiring that bodies such as Clyde Marine Planning Partnership (CMPP) are required to consult with the general public, only to then see the views actually expressed by ordinary people ignored. Why is it that none of the community councils for the Clyde coastal areas are represented as stakeholders within the Clyde Marine Planning Partnership? We would like to propose that a grouping of the various coastal community councils, is included as a significant partner and player within the decision making process of CMPP - it could be called C4 (Clyde Coastal Community Councils).</p> <p>(ii) Preserving the designation of the Cumbraes Marine Consultation Area and a proposal that Cumbraes MCA and coastal SSSIs of the Clyde Region to be redesigned as Cumbraes Research & Development Marine Protected Area – It is not clear in the Clyde Regional Marine Plan that the Cumbraes Marine Consultation Area (Cumbraes MCA) designation is secure (although this was verbally assured at the public consultation event in Largs). The designation is important on account of the area having recognised ecological, cultural and historical significance. Cumbrae MCA is an important instrument to help protect and enhance our marine environment, which if used properly could be used to help drive an eco tourism strategy for the North Coast and provide an alternative to the industrial focus for economic growth being led by the development of Hunterston PARC. The health and sustainability of the Southannan Sands Site of Special Scientific Interest (SSSI) is dependant on a coherent network of sites and whatever happens in the Cumbraes MCA will have a significant impact on the SSSI and coastline of Fairlie and North Coas</p>
About you (* indicates required information)	
10	What is your name?
	Friends of the Firth of Clyde

11	What is your email address? *																
	secretary@friendsoffirthofclyde.org																
12	Are you responding as an individual or an organisation? *																
	Individual <input type="checkbox"/> please proceed to question 17 Organisation X <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 Friends of the Firth of Clyde																
13	What are your interests in the Clyde Marine Region?*																
	<table border="0"> <tr> <td>Protection and enhancement</td> <td>X<input checked="" type="checkbox"/></td> </tr> <tr> <td>Recreational purposes</td> <td>X<input checked="" type="checkbox"/></td> </tr> <tr> <td>Commercial Purposes</td> <td><input type="checkbox"/></td> </tr> <tr> <td>Other:</td> <td>X<input checked="" type="checkbox"/></td> </tr> </table>	Protection and enhancement	X <input checked="" type="checkbox"/>	Recreational purposes	X <input checked="" type="checkbox"/>	Commercial Purposes	<input type="checkbox"/>	Other:	X <input checked="" type="checkbox"/>								
Protection and enhancement	X <input checked="" type="checkbox"/>																
Recreational purposes	X <input checked="" type="checkbox"/>																
Commercial Purposes	<input type="checkbox"/>																
Other:	X <input checked="" type="checkbox"/>																
14	The Clyde Marine Planning Partnership would like your permission to publish your consultation response. Please indicate your publishing preference: *																
	<table border="0"> <tr> <td>Publish response with name</td> <td><input type="checkbox"/></td> </tr> <tr> <td>Publish response only (without your name)</td> <td>X<input checked="" type="checkbox"/></td> </tr> <tr> <td>Do not publish response</td> <td><input type="checkbox"/></td> </tr> </table>	Publish response with name	<input type="checkbox"/>	Publish response only (without your name)	X <input checked="" type="checkbox"/>	Do not publish response	<input type="checkbox"/>										
Publish response with name	<input type="checkbox"/>																
Publish response only (without your name)	X <input checked="" type="checkbox"/>																
Do not publish response	<input type="checkbox"/>																
<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?																
	<table border="0"> <tr> <td>CMPP Newsletter</td> <td><input type="checkbox"/></td> </tr> <tr> <td>Twitter</td> <td><input type="checkbox"/></td> </tr> <tr> <td>I attended an event organised by the CMPP</td> <td>X<input checked="" type="checkbox"/></td> </tr> <tr> <td>CMPP website</td> <td>X<input checked="" type="checkbox"/></td> </tr> <tr> <td>Planning authority</td> <td><input type="checkbox"/></td> </tr> <tr> <td>Advertising, e.g. poster</td> <td><input type="checkbox"/></td> </tr> <tr> <td>Other:</td> <td><input type="checkbox"/></td> </tr> <tr> <td></td> <td><input type="checkbox"/> Please specify:</td> </tr> </table>	CMPP Newsletter	<input type="checkbox"/>	Twitter	<input type="checkbox"/>	I attended an event organised by the CMPP	X <input checked="" type="checkbox"/>	CMPP website	X <input checked="" type="checkbox"/>	Planning authority	<input type="checkbox"/>	Advertising, e.g. poster	<input type="checkbox"/>	Other:	<input type="checkbox"/>		<input type="checkbox"/> Please specify:
CMPP Newsletter	<input type="checkbox"/>																
Twitter	<input type="checkbox"/>																
I attended an event organised by the CMPP	X <input checked="" type="checkbox"/>																
CMPP website	X <input checked="" type="checkbox"/>																
Planning authority	<input type="checkbox"/>																
Advertising, e.g. poster	<input type="checkbox"/>																
Other:	<input type="checkbox"/>																
	<input type="checkbox"/> Please specify:																

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).