

## RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

### 1. Name/Organisation

Organisation Name

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### 3. Permissions - I am responding as...

Individual

Please tick as appropriate

Group/Organisation

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate  Yes  No

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick **ONE** of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick as appropriate  Yes  No

**(d)** We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

*Please tick as appropriate*

**Yes**

**No**

## CONSULTATION QUESTIONS

Please identify the main area of interest you identify with:

- Nature Conservation
- Fisheries
- Industry/Transport
- Energy
- Aquaculture
- Recreation/tourism \*
- Academic/scientific
- Local authority
- Community group
- Public sector/Regulatory body
- Local Coastal Partnership

Other (Please state)

Comments



**National Marine Plan  
Draft Consultation  
Submission from the Scottish Sports Association**

The Scottish Sports Association (SSA) thanks the Scottish Government for the opportunity to respond to this draft consultation. Should any queries result from our response, or if further engagement with the SSA or our members would be beneficial as this process develops, please do not hesitate to contact us.

The SSA is the independent and collective voice for Scottish Governing Bodies of sport. We represent their interests and currently have 52 full members and 21 associate members. The governing bodies of sport are responsible for the governance, development and delivery of their individual sports and provide a formal structure for the over 900,000 individuals in Scotland who are members of one of Scotland's 13,000 sports clubs. Most of these organisations are run on a not-for-profit basis and are managed by volunteers. They provide coaching, competition and youth participation development opportunities for their local communities and most of the 195,000 people who volunteer in sport do so within the club structure.

The SSA has compiled this response following consultation, as usual, with our member Scottish Governing Bodies (SGBs).

As part of the SSA's discussions with our members, in relation to the National Marine Plan and alongside this, the Draft Planning Circular, Marine Renewables and Priority Marine Features, the SSA has compiled this response following consultation with our Outdoor Pursuits Group, which contains representatives from 20 of our member Scottish Governing Bodies (SGBs) involved in outdoor and adventurous activities.

Our response in some cases involves clarification of terms and in others is directly linked to ensuring the discussed plans optimise and do not inhibit the practicing of sport in and around Scotland's marine areas, as well as the substantial economic and social benefits that come from this.

The SSA has in this response largely echoed the comments of both The Royal Yachting Association Scotland (RYAS) and **sportscotland** – we fully endorse their responses and as such, reflect this throughout.

**Q1. Does the NMP appropriately guide management of Scotland's marine resources?**

Comments

**Q2. Does the NMP appropriately set out the requirement for integration between marine planning and land use planning systems?**

Comments

**Q3. Does the NMP appropriately guide development of regional marine planning? What, if any, further guidance is required for regional marine planners in terms of implementation and how to interpret the NMP?**

It is unclear what functions can be devolved to regional marine planners as there is already a national sectoral plan for marine renewables, aquaculture is already devolved to local authorities, National Performance Framework 3 (NMF3) and its successors are by their very nature national in scope, and Port and Harbour Authorities have their own powers.

More consideration needs to be given as to how far a Regional Marine Plan (RMP) can elaborate the material in the National Performance Framework (NMP). Will the RMPs simply consist of regional elaborations of policies that are already in the NMP? There would be merit in considering a common structure of the NMP and the RMPs. That way an outline RMP could potentially be pre-populated with text from the NMP. Mechanisms need to be found to ensure consistency and coherence across the RMPs and the NMP. This would make it easier to implement the direction that “Regional Marine Plans are required to be compatible with the plans for any adjoining marine region” (GEN6 page 26).

The pilot Pentland Firth and Orkney Waters Marine Spatial Plan will provide useful experience.

It would be useful to clarify the status of RMPs in relation to the NMP. From a policy perspective it would be useful to understand which policy position would take precedence in decision making and to clarify, if this is the case, that RMP policy is to sit within the context of the more strategic NMP policy.

Sports Governing Bodies, along with other governing bodies, need to be clear on what they are to use as a reference point – this will significantly reduce any risk of confusion and ensure more successful implementation of any resultant policies.

**Q4. The Marine Regional Boundaries Consultation proposed that in addition to regional marine planning, further integrated management of key marine areas would be achieved by designating the Pentland Firth; the Minches and the mouth of the Clyde as Strategic Sea Areas.**

## **Should the NMP set out specific marine planning policies for Strategic Sea Areas?**

First off, in regard to definition:

It would be useful for the NMP to define what Strategic Sea Areas are, avoiding the need to refer to other documents, and what their purpose is. To this end it would also be useful for the NMP to set a policy context for Strategic Sea Areas. The relationship between Strategic Sea Areas and RMPs needs to be made clear, including their policy relationship and the NMP could usefully clarify this.

It may not be necessary for there to be specific marine planning policies for Strategic Sea Areas, provided it is mandatory either for the component Marine Regions to consult each other on any matter that has an impact on the issues that led to the Strategic Sea Areas being declared or for there to be an alternative mechanism that meets the same objective. For example, the Marine and Coastguard Agency should have a key role in relation to safe navigation.

Should Strategic Sea Areas be adopted there may be benefit in strategic direction from the NMP being given to ensure national targets are met and a consistent approach is adopted across the three areas.

### **Q5. Are the objectives and policies in the NMP appropriate to ensure they further the achievement of sustainable development, including protection and, where appropriate, enhancement of the health of the sea?**

Our members are concerned that the sector specific chapters do not include a social analysis. Each sectoral chapter includes an economic and an environmental assessment of the sector but not a social analysis. Given society is the third pillar of sustainability we do not consider that the NMP will effectively deliver sustainable development without this social analysis. A social analysis is particularly relevant to sport and recreation interests (e.g. allowing sports development needs – including clubs and competition - and aspirations to be explored, understood and recognised, as well as the significant health and well-being benefits they deliver) and one our members would like to see developed at the sectoral level throughout the NMP.

The case for social analysis in the sectoral chapters is supported by policy GEN 3 which stresses the importance of social benefits.

It is important to remember too that ultimately successful implementation of this policy is dependent on a number of external factors - the expenditure of significant resources, sustainable development is at risk from external factors due, for example, to climate change or spread of invasive non-native species. The success of some policies depends too on effective action being taken in the terrestrial realm.

**Q6. Chapter 3 sets out strategic objectives for the National Marine Plan and Chapters 6 – 16 sets out sector specific marine objectives.**

**Is this the best approach to setting economic, social and marine ecosystem objectives and objectives relating to the mitigation of and, adaptation to climate change?**

Our members are supportive of a sector-specific approach. However although separate, the Plan should ensure all of these separate areas within the NMP are still compatible with each other and the overall objectives of the NMP.

That said, it is important to note too that within sectors (recreation and tourism) there are also differing planning needs so individuality does need to be taken into account.

**Q7. Do you have any other comments on Chapters 1 – 3?**

Page 16 makes reference to the use of sound science as a strategic objective. Our members are fully supportive of this and that impacts on the environment should not be assumed. Our members fully agree with the second bullet point that sound evidence underpins effective management. We note the reference to the precautionary principle in the third bullet point and the need for this to be applied consistently in accordance with devolved administrations' sustainable development policy. It is not clear what Scotland's sustainable development policy is and whether that policy actually includes a definition (and an agreed definition) or explanation of the precautionary principle and how it is to be applied. This is an important point given the status applied to the precautionary principle in the NMP. It is crucial that the precautionary principle is fully understood and applied consistently and that decision making based on precaution and uncertainty is limited in the marine environment. The NMP should make reference to the relevant sustainable development policy in Scotland including an agreed definition of the precautionary principle.

### **General Planning Policies**

**Q8. Are the general policies in Chapter 4 appropriate to ensure an approach of sustainable development and use of the marine area? Are there alternative policies that you think should be included? Are the policies on integration with other planning systems appropriate? A draft circular on the integration with terrestrial planning has also been published - would further guidance be useful?**

In relation to GEN1 we note the reference to sustainable development being that which delivers multiple benefits and that while these include economic benefits they also include social benefits related to quality of life and well-being. Our members are fully supportive of this and consider that this

supports the point we make above about the importance of the sectoral chapters including a social analysis. In addition we note the reference to the importance of the promotion of Scotland's key growth sectors and that tourism is one of these sectors. It is important for the NMP and RMPs to recognise that sport and recreation is integral to the Scottish tourism product and its growth and for this to be reflected in policy.

Some clarity is however required on the meaning within the NMP of 'sustainable' - it can have numerous meanings. Examples could be given of impacts of activities that would lead them not to be consented because they would not be considered sustainable. These might include adverse impact on Natura 2000 sites (GEN 11 and 12), risk to safe navigation or failure to meet Aquaculture and Marine Stewardship Council accreditation.

Our members are fully supportive of GEN3 and the recognition that is given to social benefits. This relates to the point we make above about the importance of social benefits being addresses in the sectoral chapters. We support the specific reference made to sport and recreation as components of social benefits.

Clarification is needed too in regard to the Plan's loose use of the term 'community' and intermittent use of this with 'local' or 'coastal':

Our members strongly support the recognition given to the fact that social benefits don't just apply to or derive from *local* communities but are equally relevant to communities out with a locality and who travel from elsewhere to use the marine and coastal environment.

While we support GEN4 the reference to *local* communities should be revised in recognition of the point made in GEN 3 that relevant communities are not just *local*. It may be useful to note the definition of community given in the glossary of the Scottish Planning Policy, which recognises that communities are not just local. The SPP states:

Community	the term community includes individuals and groups, and can be based on location (for example people who live, work or use an area) or common interest (for example the business community, sports or heritage groups).
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RYA Scotland echoes this: The addition of the word 'local' or 'coastal' (GEN 14) to the explanation appears to narrow the audience for which an impact will be considered.

In the marine environment defining a 'local' group may prove to be challenging and in terms of GEN 14 only considering the 'coastal' community may prove to be too narrow. An alternative may be to consider a 'community of interest' – something already encouraged in SSA submissions to the terrestrial Scottish Planning Policy, National

Performance Framework 3 and the Community Empowerment and Renewal Bill Consultation– that would then allow communities to be better defined and the impact upon them more accurately assessed.

In this regard recreational and sporting bodies would afford an effective way of exploring impact on these 'communities of interest'.

There is also concern around the approach outlined in paragraph 2 of page 26 which suggests a zoned approach to different sectors. While we recognise that this will work for some sectors it should not mean the creation of no go areas for sport and recreation. Sport and recreation is by its nature mobile and we would not like to see zones identified where recreational activity would potentially be unjustifiably restricted.

GEN6 should also make reference to the facilitation of access *along* the shore this being an important component of coastal sport and recreation and Scotland's access rights. It would be useful to make a specific reference to Scotland's access rights in recognition of these rights and the range of activities they include that will take access to and within coastal areas.

Our members are fully supportive of GEN8.

We recommend that GEN 10 should be amended to remove the word 'reasonable' from the second sentence of the boxed text. Instead we consider that where evidence is inconclusive *sustained* efforts should be made to fill evidence gaps. It is crucial that decision making is based on evidence rather than precaution and uncertainty. The current use of the word reasonable in the policy underplays the importance of removing precaution and uncertainty as the basis for decision making.

GEN10 appears, in footnote 28, to give a loose definition of the precautionary principle. No indication is given as to where this definition comes from and that it is an agreed approach. It is contrary to the definition, for example, provided in paragraph 132 of the Scottish Planning Policy. It also appears to contradict the approach to the application of the precautionary principle outlined on page 16 of the NMP which recommends that its application should be consistent with and based on the Scottish Government's sustainable development policy (although it is not clear what that is). **sportscotland** has set out its approach to the precautionary principle in the policy document *Out There*. Please see section 3.4 page 40 of the link below which outlines the **sportscotland** approach to the precautionary principle and how it could be applied.

[http://www.sportscotland.org.uk/resources/resources/out\\_there/](http://www.sportscotland.org.uk/resources/resources/out_there/)

While our members are fully supportive of GEN12 it is crucial that decision making is evidence based and that impacts on the environment are not assumed.

Our members are supportive of GEN17 although consider that the policy



could be more explicit in its application to sediment shift in addition to coastal erosion and accretion. Sediment shift can impact on moorings and on surf sports where shore breaks are dependent on sand bars. In addition recognition needs to be given to the potential impact of development on wind and wave patterns and on currents (e.g. tidal streams) – elements of the marine environment that are integral to the practice of a number of marine sports. We recognise that understanding of the impact of development on such elements is limited but urge research to increase the understanding of the impact of development on wind, wave and current patterns and the consequent impact this could have on sport and recreation interests.

Our members are supportive of GEN18 but recommend that impacts on the quality of water in areas particularly important for immersion sports should also be an area that should be particularly taken into account. We appreciate that there may be a correlation between such areas and bathing waters but that this will not always be the case.

**Q9. Is the marine planning policy for landscape and seascape an appropriate approach?**

Our members fully support the recognition given to the importance of landscape and seascape to the enjoyment of sport and recreation.

It is unclear to what degree the seascape is protected by National Scenic Area, National Park designation and by Core Wild Land mapping. How much of the seascape for example is integral to and protected by an National Scenic Area or Core Wild Land? The approach is good but the link between landscape and seascape needs to be strengthened perhaps by identifying areas of sea that are the equivalent of a National Scenic Area.

It would be useful to have clarity on this to ensure the full protection of seascape assets. It may be that a new seascape designation is needed to protect our most important areas. This said it is unclear how quality of seascape is assessed and how one area of sea might be considered to be of more seascape value than another. To this end it would be useful if a recognised seascape quality assessment mechanism existed or was developed along with some form of seascape impact assessment tool.

For our members the beauty of Scotland's coastline and seascapes is what draws many people to enjoy recreation here, therefore clarity on seascape designation is an important issue to be addressed.

It is worth keeping in mind previous comments on the definition of 'community' - clarity on this will assist in planning designated seascape areas, ensuring all interested parties, not just local, are considered in the process.

**Q10. Are there alternative general policies that you think should be included in Chapter 4?**

It would be useful for the NMP to provide clarity on where management activity sits within a planning, licencing and consenting regime within NMP. In relation to recreation, there are a number of mechanisms used to manage the way recreation is practiced and how it integrates with other uses and interests. These include byelaws, management rules and agreements, codes of conduct, good practice guidance, signage, user forums etc. It is not clear what role the NMP has for setting a policy context for such management and it is unclear who would have responsibility for such management in the marine environment? Would this, for example, be a role for the Marine Planning Partnerships? We note the reference in GEN 12 to the non-native species code of practice and the advocacy for its use. There are a range of sport and recreation codes and advice that it would be relevant to make reference to in the Tourism and Recreation chapter.

### **Guide to Sector Chapters**

**Q11. Do you have any comments on Chapter 5?**

**Are there other sectors which you think should be covered by the National Marine Plan?**

Comments

### **Sea Fisheries**

**Q12. Do you have any comments on Sea Fisheries, Chapter 6?**

Comments

**Q13. Are there alternative planning policies that you think should be included in this Chapter?**

Comments

### **Aquaculture**

**Q14. Does Chapter 7 appropriately set out the relationship between terrestrial and marine planning for Aquaculture? Are there any planning changes which might be included to optimise the future sustainable development of aquaculture?**

Comments

**Q15. Do you have any comments on Aquaculture, Chapter 7?**

Aquaculture 10 notes the importance of engagement with **local**

**communities** to prevent conflict. Further to the point raised in Q8 and 9 regarding definition, the SSA would support clarification of this term in this area.

The traditional users of a site may not be considered local from a terrestrial perspective but be close from a marine view, particularly in areas such as the West coast of Scotland which is characterised by sea lochs and islands. People who consider themselves local may even live in another Local Authority – in addition to people doing activities locally, those taking part in marine or coast-line-based recreation often travel from elsewhere to do so.

Accordingly, and in keeping with our response to Q8 and Q9, we would like clarity on the definition of the term community, the avoidance of linked terms that narrow the definition (coastal or local community etc.) and active consideration of ‘communities of interest’ which can traverse geography.

**Q16. Are there alternative planning policies that you think should be included in this Chapter?**

### **Wild Salmon and Migratory Fish**

**Q17. Do you have any comments on Wild Salmon and Migratory Fish, Chapter 8?**

**Q18. Are there alternative planning policies that you think should be included in this Chapter?**

### **Oil & Gas**

**Q19. Do you have any comments on Oil and Gas, Chapter 9?**

**Q20. Are there alternative planning policies that you think should be included in this Chapter?**

Our members support RYA Scotland in noting the absence of planning policy associated with procedures were there to be a pollution causing incident – this affects all users of marine areas so protocol and research into likely impacts needs to be assessed.

## **Carbon Capture & Storage (CCS)**

**Q21. Do you have any comments on Carbon Capture and Storage, Chapter 10?**

Comments

**Q22. Are there alternative planning policies that you think should be included in this Chapter?**

Comments

## **Offshore Renewable Energy**

**Q23. Should the NMP incorporate spatial information for Sectoral Marine Plans?**

Comments

**Q24. Do you have any comments on Offshore Renewable Energy, Chapter 11?**

Comments

**Q25. Are there alternative planning policies that you think should be included in this Chapter?**

Comments

## **Recreation and Tourism**

**Q26. Do you have any comments on Recreation and Tourism, Chapter 12?**

Our members fully support the inclusion of a specific Recreation and Tourism chapter.

The first objective should be revised to make reference to *coastal* as well as marine recreation.

Is the NMP clear what is meant by the term sport development (does it need to be)? Would it be useful for the plan to include some explanation of what is meant by sport development? To our members, sport development is about encouraging participation and then development in sport with a focus on schools and clubs participation and development by way of training, coaching, leadership and qualification and through competition and events. This could usefully be explained in the text or in a glossary to the NMP.

In relation to the objective on improved data on marine resources it is

important to define what is meant by a key resource. It is crucial to appreciate the difference between a popular resource for sport and an important resource for sport, in carrying out this work. A resource only used or capable of being used by only a small number of users, because of its technical challenge or perhaps its remote location, may still be very important for a sport, e.g. the wave at Thurso East, windsurfing at Tiree or climbing the Old Man of Hoy. Both popular and important resources can be key resources.

We note the reference on page 97 to research on participation levels and key areas and we would be keen to be involved with this.

Our members strongly support the recognition given in paragraph 3 of Part 1 to the health and social benefits of participation in recreation. As outlined in our comments on the General policies we consider it important for all the sectoral chapters to provide a social assessment of the relevant sector. Chapter 12 provides an economic and environmental assessment of tourism and recreation but does not provide a social analysis. Without this analysis we do not see how the NMP can be taking a comprehensive approach to sustainable development, identified as a key objective in GEN1. It is important for Chapter 12 to give a full assessment of the value of recreation for health and well-being, important national outcomes in Scotland Performs. As part of this our members would like to see specific reference made to sport development and the value of the marine environment to participation, development and performance in sport and the need to recognise these qualities and promote and protect them.

It is not clear what the sporting network is that is referred to in that last sentence of paragraph 3 Part 1. We suggest that the last sentence should be revised to read *This extends to the considerable sporting success Scotland has had in a number of marine disciplines.*

In relation to the activities with potential to contribute to the economy as set out on pages 98 and 99, it might also be useful to make reference to the training and coaching and qualifications industry through centres such as the national watersports centre at Cumbrae and the contribution this can make to the economy.

In relation to the paragraph on coastal walking it would be useful for the plan to make a reference to access rights in general and not just to walking. Cycling and to a lesser degree horse riding are all popular on the coast and on coastal paths. Scotland's access rights apply to walking, cycling and horse riding. Local Authorities have a statutory duty to uphold access rights. Likewise, it would be useful for the table on page 97 to make reference to coastal access rather than just coastal walking. In addition it might be useful, in the paragraph on coastal walking, to make reference to Long Distance Routes and the aspiration for these to become a National Development in the NPF3. Many of such routes are located on the coast e.g. Fife Coastal Path, Kintyre Way, Ayrshire Coastal Path, Moray Coast Trail, with significant potential for economic return.

Will these policies be in line with terrestrial planning re-access to and along the coast? How does this link to Local Development Plans? Are they complimentary (and if so, necessary?) or are there any areas of contradiction?

It might also be relevant to make reference to links golf.

In relation to the section on 'Interactions with other users' and particularly the section on inter-recreational activity, this is where it would be useful to address the point we make in response to Question 10 and what role the NMP might have in relation to other planning and management options out with a consenting and licencing regime. There will be a need to address positive marine management through the use of e.g. education or codes of conduct, good practice guidance, signage etc. but it is not clear from the plan where this sits and who will or should or does have responsibility for this.

The section on 'Living Within Environmental Limits' seems a bit forced. Compared to other sectors the impact of sport and recreation on the environment will be limited and it is important to highlight this point. It is crucial that impacts of recreation on the environment are not assumed and that decision making is evidence based.

### Part 3 – Marine Planning Policies

It would be useful to have clarity in the NMP (and apologies if this is already detailed) on the intended extent of the marine planning policies. Are they intended to address only development and activity requiring consent and/or licence or is their reach intended to go further than that and extend to the planning and management of activity beyond a consenting regime (again this would address our response to Question 10)? Is there any limit e.g. within the Marine Planning Act, on what the NMP policies can address?

It is not clear to what degree the NMP can influence activity out with a licencing and consenting regime. Recreation and Tourism 4 for example, talks of recreation activity, but it is unclear how much recreation activity actually requires licence or consent and to what degree therefore the policy is applicable or relevant to recreation activity. It is not clear what degree of control can be exerted over recreation activity where no licence or consent is required.

In the same way it is not clear that policy Recreation and Tourism 7 can actually require you to comply with a code of conduct it can only encourage?

Recreation and Tourism 1 – the first bullet point should make reference to access along the shore as well as to the shore. It would be useful to make a reference to avoiding negative impacts on access rights generally.

We suggest the following revision to bullet 2 of Recreation and Tourism 1–

‘The extent to which the proposal is likely to adversely affect *the physical and experiential* qualities important to recreational users’.

We support the references in bullets three and four of Recreation and Tourism 1 to looking at reasonable alternatives and to considering mitigation where proposals will impact on recreation interests. There may however be circumstances where alternatives and mitigation are not possible. The policy should make clear that there may be some circumstances where a proposal should not proceed where mitigation can’t be agreed and the impact of a proposal will be significant on a recreation interest of particular importance. It is important that the value of marine recreation is fully appreciated (world class in some locations) and to accept that in some circumstances it may be that the importance of recreation should take precedence where appropriate mitigation cannot be agreed. What happens to an important area for recreation if there is a risk which can’t be mitigated or another site can’t be found – should the development still go ahead?

We recommend that Recreation and Tourism 1 should also make reference to the importance of involving sport and recreation interests in the decision making process and for them to be fully involved in consultation as proposals come forward.

Recreation and Tourism 2 should make it clear that the policy is referring to prospects for significant tourism and recreation development when the policy refers to *prospects for significant development*. It is important that the policy cannot be misinterpreted to allow significant non recreation development in sites important for recreation.

Recreation and Tourism 2 should also be revised to make clear that it is not just recreational areas *with prospects for significant development* which should be identified. Sites that are important for recreation regardless of their development potential should also be identified to ensure that these are protected from development pressure and incorporated into positive marine planning.

Recreation and Tourism 3 should make reference to the need to protect areas important for tourism and recreation generally, in addition to protection of access and facilities.

In relation to Recreation and Tourism 4, impacts from recreation should not be assumed and should be evidence based. The assessment of impacts should take into consideration the abundance or extent of a particular resource (locally and nationally) e.g. sea grass and salt marsh, in deciding on the degree of impact and the appropriate response.

The final sentence in Recreation and Tourism 5 should be amended as

follows –

‘Co-operation and sharing infrastructure or facilities with complementary sectors will be supported *where appropriate* by decision makers.’

It is unclear why Recreation and Tourism 6 is included just for the recreation and tourism sector and not for other sectors that would have more of an impact on coastal residents. The policy is also ambiguous lacking clarity on what sort of impact on residents is of concern. We recommend that the policy be removed.

#### Part 4 - The Future

Bullet five needs to be addressed. This is a real concern and perhaps the bullet should instead be about recognising that this is a concern and trying to avoid it happening. In combination with the work Marine Scotland will be doing on data gathering on marine recreation the bullet could usefully say something like – *a fuller understanding of marine and coastal recreation including of the impacts of renewable energy development on the sector resulting in more informed and positive planning for the sector.*

Our members would recommend making reference in Part 4 to the work RYA(S) are carrying out, with support from **sportscotland**, on the development of their facilities strategy which will strategically plan for future facility needs for the sport over the next 12 years.

#### **Q27. Are there alternative planning policies that you think should be included in this Chapter?**

Please see our earlier comments on a social analysis of the recreation sector. This will give the full picture of the value of recreation and ensure its protection and promotion for the contribution it makes to sport development, health and well-being, as well as the economy.

It is important for policy to recognise the difference between recreation and tourism. We recognise that the two sectors are linked but they are also different and policy needs to be clear what a resource is being protected for. A resource may be important for local club use for example, which may contribute nothing to the tourism sector.

#### **Transport (Shipping, Ports, Harbours & Ferries)**

#### **Q28. Should the NMP specifically designate national significant ports/harbours as described in Chapter 13: Marine Planning Policy Transport 2?**

Comments

#### **Q29. Do you have any comments on Transport, Chapter 13?**



The SSA supports in Transport 4, plans for a joined up cross-sector approach to marine facility maintenance, repair and development.

**Q30. Are there alternative planning policies that you think should be included in this Chapter?**

The SSA supports RYA Scotland's statement:  
That where possible new port and harbour developments be approached with multiple use in mind.

### **Telecommunication Cables**

**Q31. Do you have any comments on telecommunications, Chapter 14?**

Comments

**Q32. Are there alternative planning policies that you think should be included in this Chapter?**

Comments

### **Defence**

**Q33. Do you have any comments on Defence, Chapter 15?**

Comments

**Q34. Are there alternative planning policies that you think should be included in this Chapter?**

Comments

### **Aggregates**

**Q35. Do you have any comments on Aggregates, Chapter 16?**

Comments

**Q36. Are there alternative planning policies that you think should be included in this Chapter?**

Comments

### **Business and Regulatory**

**Q37. Please tell us about any potential economic or regulatory impacts, either positive or negative, that you think any or all of the proposals in this consultation may have.**

Comments

### **Equality**

**Q38. Do you believe that the creation of a Scottish National Marine Plan discriminates disproportionately between persons defined by age, disability, sexual orientation, gender, race and religion and belief?**

Yes  No

**Q39. If you answered yes to question 23 in what way do you believe that the creation of a Scottish National Marine Plan is discriminatory?**

Comments

### **Sustainability Appraisal**

**Q40. Do have any views/comments on the Sustainability Appraisal carried out for the NMP?**

Comments