

Response ID ANON-4M7G-MDKR-D

Submitted to National Marine Plan 2 Strategic Environmental Assessment (SEA) Scoping Report
Submitted on 2023-10-30 15:49:06

Questions

1 Do you have any comments on either the environmental topic areas or assessment methodology proposed?

Please provide your comments :

The environmental topic areas and proposed assessment methodology appears to be appropriate.

We are encouraged to note that Section 3 of the SEA Scoping Report makes reference to remote islands and island communities, including in terms of maintaining and improving connectivity.

We note and support the inclusion in the section Population & Human Health of the Key Environmental Issue 'Allowing for sustainable development on Scottish islands and rural coastal areas'.

We consider that a similar environmental issue could be included in the section on Cultural Heritage to reflect the importance of existing and established aquaculture and fishing industries, in Shetland and in other Scottish islands and rural coastal areas.

2 What are your views on the broad policy framework and is there any further information that you feel should be considered?

Please provide your comments :

We felt that Section 2 of the SEA, whilst referring to the value of the aquaculture industry to Shetland, could have also included recognition of the economic value of our fishing industry. Whilst we are aware that NMP2 will be subject to Island and Communities Impact Assessment and Socio-Economic Impact Assessment, with regards to Shetland's commercial fishing industry we wish to emphasise that:

- 34% of all the fish landed by UK fishing boats are caught within 50 miles of Shetland.
- 10% of all the fish landed by UK fishing boats are landed in Shetland.
- More fish are landed in Shetland than in all of England, Wales and Northern Ireland.
- Shetland has 40% of Scotland's pelagic fleet, 25% of Scotland's whitefish fleet and 20% of Scotland's under 10m fleet.
- All Shetland fishing vessels, bar one, are family owned and therefore represent 250+ individual businesses, owned and crewed by 450+ residents, with an annual turnover of £138.9m
- Additionally, Shetland's fishing industry plays an important role in food security for Scotland and beyond.

With regards to Shetland's aquaculture industry we are aware that:

- Shetland salmon farms produce more than 36,000 tonnes of salmon annually, which is worth more than £190 million. The salmon sector now accounts for the largest proportion of Shetland's economy, bigger than oil and gas and tourism.
- Shetland finfish/salmon aquaculture accounted for 20% of the total Scottish production in 2021.
- Shetland shellfish aquaculture accounts for 80% of the total Scottish production and employs 55 full-time and 46 part-time and casual workers. Taken from: Marine Scotland Science Scottish Shellfish Farm Production Survey 2021 (www.gov.scot)
- Additionally, Shetland's aquaculture industry plays an important role in food security for Scotland and beyond and is a low carbon food production method.

Furthermore, our Islands will play a key role in delivering a transition to net-zero and renewables targets through future ScotWind and offshore renewables development and Shetland Islands Council have developed their own set of Energy Development Principles. One of the key principles in relation to the marine environment in relation to energy development on and around Shetland is 'Protecting the Marine Environment and Existing Economic Sectors' and this focuses on marine environmental protection and co-existence with our aquaculture and fishing industries. See: <https://www.shetland.gov.uk/climate-change-3/shetland-energy-development-principles>

In light of this representatives from the Shetland Islands Marine Planning Partnership attended the recent Consultation Café for the NMP2 SEA Scoping and raised the potential for the SEA to consider the incorporation of ICIA and Socio-Economic Impact relative to Scottish Islands/Island Communities, as well as going into detail on regional/Island variations and nuances.

This includes our well-established approaches to Marine Spatial Planning in Shetland, through our Marine Spatial Plan, Regional Marine Plan and Masterplans for marine areas (Sullom Voe Harbour Masterplan), for which we have developed a range of data, information and approaches.

Additionally this includes matters such as the Shetland Coastal Character Assessment, and the Shetland Coastal Values Survey that were prepared by the Marine Spatial Planning Team at UHI Shetland as part of the suite of documents to compliment our Regional Marine Plan. See: www.shetland.uhi.ac.uk/research/marine-spatial-planning/shetland-islands-regional-marine-plan/

3 Is there any further information or data that you feel should be considered as part of the environmental evidence base for the assessment?

Please provide your comments :

With regards to the section on 'Material Assets' we consider that recognition should be given to the powers afforded to Shetland Islands Council under the Zetland County Council Act 1974 (as amended). Under the Act, Shetland Islands Council has a duty to promote the conservancy of, and control of development in, the coastal area of Shetland, with the exception of those areas under the jurisdiction of Lerwick Port Authority or Broonies Taing Pier Trust.

Shetland Islands Council has an established works licence policy to support the Act which gives the Council powers to grant licenses for the placing of 'works' (works licenses) as defined by the Act of 1974 in the sea, on the seabed or on the foreshore below Mean High Water Springs (MHWS) and out to 12 nm. Works means developments of all types other than that for the purposes of marine fish farming. The Act of 1974 also empowers the Council to grant dredging licenses within the limits of territorial waters around Shetland.

The works licence policy has been drawn up in recognition of the Council's commitment to sustainable development of which the key aims in relation to development in the coastal area are to:

- Encourage appropriate development that maintains and improves life chances for local people.
- Involve local communities in the decision making process.
- Protect and enhance Shetland's environment.

See: www.shetland.gov.uk/downloads/file/2007/works-license-supplementary-guidance-2017

Furthermore, within this section, we feel that recognition should also be given to The Shetland Islands Regulated Fishery (Scotland) Order which came into force in 1999. From this the Shetland Shellfish Management Organisation (SSMO) was set up in 2000 and was granted the legal right to manage the Regulating Order. There have since been another two Regulating Orders with the current one being conferred on SSMO until 2028.

SSMO manages the commercial shellfish fisheries between tide line and the 6 mile limit around the coast of Shetland. These fisheries are for lobsters, crabs, scallops, queens, whelks, clams, razorshells, cockles, mussels and oysters. Amongst other things, the Regulating Order give the SSMO the power to impose restrictions and regulations, to issue licences and the right to set tolls.

Additionally, under the Section 'Water', recognition should be given to the role of KIMO International, of which Shetland Islands Council is a founding member. KIMO's members share a vision of healthy seas, clean beaches and thriving coastal communities. Their mission is to unite local governments, prevent pollution and protect, preserve and enhance the seas and coastal waters of the North-East Atlantic and Baltic regions. The work of KIMO International encompasses a range of action areas and initiatives which are relevant to the broader policy context and the environmental protection objectives relevant to NMP2. It should also be noted that KIMO International contribute to the work of the Advisory Group for the Shetland Islands Regional Marine Plan.

Please refer to: <https://www.kimointernational.org/action-areas/plastic-pollution-and-marine-litter/>
<https://www.kimointernational.org/action-areas/offshore-energy/>
<https://www.kimointernational.org/action-areas/maritime-safety-and-pollution/>
<https://www.kimointernational.org/action-areas/hazardous-waste-and-dumping-at-sea/>

The work and purpose of the Sullom Voe Oil Terminal Advisory Group along with their environmental research and baseline studies could help contribute towards the NMP2 Evidence Base. Shetland Islands Council continue to work alongside them to develop our understanding of our marine environment, and also consider future approaches to securing environmental objectives and monitoring for offshore wind developments through the Shetland Energy Development Principles.

Please see: www.soteag.org.uk/

Finally as part of our Regional Marine Planning Partnership, UHI Shetland have published a range of environmental information and data which could be used to inform the NMP2 SEA process at a more regional level. We would be happy to engage further with you on this, so please visit: www.shetland.uhi.ac.uk/research/marine-spatial-planning/shetland-islands-regional-marine-plan/

4 What are your views on the early work set out in the report to identify key environmental issues that will be used to inform the development of SEA Objectives for assessment (SEA Objectives - Section 3, Table 1)?

Please give us your views:

This appears to be appropriate. As mentioned in our answer to question 1, we welcome the references to Island Communities and coastal communities.

Are there any additional environmental issues that should be considered in the assessment?:

No.

5 What are your views on the SEA Objectives used to assess National Marine Plan (2015), (SEA Objectives – Section 3, Table 2)?

Please provide your comments :

In light of our comments above, we consider that the Topic 'Communities, Population and Human Health' should include an objective which aims to contribute towards, or ensure, the 'co-existence' of development and use of the marine environment for the benefit of island communities, remote island communities and coastal communities.

6 Do you have any further comments on the SEA scoping report?

Please provide your comments :

We have no further comments to make, other than the Shetland Islands Marine Planning Partnership (Shetland Islands Council & UHI Shetland) would welcome the opportunity to continue to engage effectively with the Scottish Government's Marine Directorate in developing NMP2 and the SEA process.

We shall also take the opportunity to raise awareness and inform members of the Shetland Islands Regional Marine Plan Advisory Group of these processes.

About you

What is your name?

Name:
Simon Pallant

What is your email address?

Email:
simon.pallant@shetland.gov.uk

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:
The Shetland Islands Marine Planning Partnership

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response only (without name)

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?

Yes

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Slightly satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Slightly satisfied

Please enter comments here.: