



## **Draft Firth of Clyde Marine Spatial Plan: Consultation Report**

**December 2009**

**Scottish Sustainable Marine Environment Initiative**

**SSMEI Clyde Pilot**

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**Draft Firth of Clyde Marine Spatial Plan**

**Consultation Report**

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## GLOSSARY AND ACRONYMS

AMA	Area Management Agreement
AMP	Area Management Plan (Water Framework Directive)
(L)BAP	(Local) Biodiversity Action Plan
CAR	Controlled Activities Regulations (2005)
CC	Community Council
CFA	Clyde Fishermen's Association
CMC	Clyde Moorings Committee
COAST	Community of Arran Seabed Trust
EIA	Environmental Impact Assessment
EUNIS	European Nature Information System
FAO	United Nations Food and Agricultural Organisation
FoCF(CG)	Firth of Clyde Forum (Core Group)
GCC	Glasgow City Council
GCVSDPA	Glasgow and the Clyde Valley Strategic Development Planning Authority
GRAB	Group for Recycling in Argyll and Bute
ICES	International Council for the Exploration of the Sea
ICZM	Integrated Coastal Zone Management
IFG	Inshore Fisheries Group
IMS	Indicative Mariculture Strategy
JNCC	Joint Nature Conservation Committee
LLTNPA	Loch Lomond and The Trossachs National Park Authority
LSVIA	Land and Seascape Visual Impact Assessment
MCS	Marine Conservation Society
MPA	Marine Protected Area
MSC	Marine Stewardship Council
MSP	Marine Spatial Plan
NGO	Non Governmental Organisation (voluntary /charitable sector)
NSA	National Scenic Area
NTS	Non-Technical Summary (of SEA Environment Report)
NTZ	No Take Zone
RBMP	River Basin Management Plan
RSPB	Royal Society for the Protection of Birds
SAMS	Scottish Association for Marine Science
SARF	Scottish Aquaculture Research Forum
SEA	Strategic Environmental Assessment
SEPA	Scottish Environment Protection Agency
SFF	Scottish Fishermen's Federation
SFPA	Scottish Fisheries Protection Agency
SNH	Scottish Natural Heritage
SMR	Scottish Marine Region
SPA	Special Protection Area (classified under the Birds Directive)
SSACN	Scottish Sea Angling Conservation Network
SSMEI	Scottish Sustainable Marine Environment Initiative
SSSI	Site of Special Scientific Interest
WFD	Water Framework Directive
WWTW	Waste Water Treatment Works

## EXECUTIVE SUMMARY

This report summarises the process and outcomes of a public consultation on the draft Firth of Clyde Marine Spatial Plan (the Plan) and associated Environment Report published in March 2009, as outputs of the Scottish Sustainable Marine Environment Initiative (SSMEI) Clyde Pilot project.

The overarching purpose of the consultation was to gather views to assist both in future revision and trial implementation of the draft voluntary Plan for the Firth of Clyde and in the ongoing development of statutory marine planning, particularly at a regional level, within Scotland.

The report describes the approach to the public consultation on the draft Plan and Environment Report in the period 31 March to 26 June 2009. The 38 responses received were fairly evenly split among members of the public, organisations with a Scotland-wide remit, and bodies with a local or regional interest, including planning authorities and community councils. Ten responses were from groups or individuals on Arran, seven originated within the greater Glasgow and Clyde estuary area, eight were from other parts of the Firth of Clyde and thirteen were from national organisations.

Where permissions have been granted, the full text of comments will be placed on the project website ([www.clydeforum.com/ssmei](http://www.clydeforum.com/ssmei)). Within Appendix 2 of this report, substantive comments are summarised in a series of tables covering: general issues and suggestions for marine management; SSMEI Clyde Pilot project remit; content of the Plan; format and presentation of the Plan; process of Plan development; and, the Environment Report. The project's responses to these comments are also detailed within these tables.

Many respondents recognised and welcomed the draft voluntary Plan as a useful first step in the development of statutory Marine Spatial Planning for the Firth of Clyde and more widely in Scotland. There was also explicit support for the Plan's vision and tacit support for many of the policies and proposals, particularly in relation to the environment. However, the Plan was widely felt not to be sufficiently spatial in approach and there were also concerns about the level of integration of sectoral plans within the Plan and about the ability of a voluntary approach to deliver sustainable development.

Several themes emerged from the consultation, including:

- the challenges inherent in implementing an ecosystem and evidence based approach to marine planning
- the overall purpose of marine planning, and in particular whether it should primarily be about conservation or restoration of natural resources and/or biodiversity or about forward, sustainable, development of sectors such as mariculture, fisheries, and recreation and tourism.
- the relationship of marine planning to other marine, and coastal, management plans and management bodies, including terrestrial

development plans, River Basin Management Plans (RBMP), and, in particular, Inshore Fisheries Groups (IFG).

- the potential role of Marine Protected Areas within marine planning and management
- stakeholder engagement and public consultation in the context of developing strategic marine plans for heavily populated regions

The consultation also identified a number of policy gaps within the Plan including: recreational activities such as wildlife tourism, coastal walking and sea angling; climate change impacts and coastal flood risk management; and, opportunities for marine focused education, training and research.

The proposed trial implementation of the Plan in the next phase of the SSMEI Clyde Pilot was broadly welcomed, as were many of the specific proposals in the action plan. However, concerns were voiced about the possible composition and public accountability of any implementation body and about the availability of additional resources for voluntary implementation.

## 1 INTRODUCTION

The Scottish Government's Scottish Sustainable Marine Environment Initiative (SSMEI) is testing novel approaches to the management of Scotland's seas and coasts. The SSMEI Clyde Pilot is one of four SSMEI pilot projects. The Pilot aims to deliver integrated and sustainable management of marine and coastal areas of the Firth of Clyde, through operation of an effective stakeholder-regulator partnership. A key tool by which this partnership aims to deliver the Clyde Pilot's aims is the development and trial implementation of a voluntary Firth of Clyde Marine Spatial Plan (the Plan).

This document describes the consultation comments received by the Clyde Pilot with respect to the draft Plan<sup>1</sup> and associated Strategic Environmental Assessment (SEA) report<sup>2</sup>, which were published on 31 March 2009. It also sets out the SSMEI Clyde Pilot's responses to these comments. This report will inform the development of a revised Plan and its trial implementation. It will also provide information relevant to the development of a new statutory marine planning regime for Scotland, as proposed in the Marine (Scotland) Bill.

### 1.1 Firth of Clyde Marine Spatial Plan

The Plan establishes an overarching policy framework to facilitate the sustainable development of activities within the Firth of Clyde. It has been in development since 2006 and represents an innovative approach to marine planning, based on Scottish Ministers' commitment to making marine management more efficient, inclusive and accessible now and for future generations. The Plan is a framework based on the aspirations of stakeholders and regulators within the Clyde, which sets out how an agreed vision can be achieved. Its purpose is to give direction and guide the sustainable development of activities, by both the public and private sector, within the Firth of Clyde.

The Plan is non-statutory and aims to complement and seek to influence terrestrial plans. Terrestrial focused policies and proposals are included for guidance and it is to be hoped that these will be considered in future strategic and local terrestrial development plans as these are prepared.

### 1.2 Strategic Environmental Assessment

The development of the Plan was in part informed by a process of Strategic Environmental Assessment (SEA). The SEA process ensured that potential environmental effects of the Plan were fully considered during the course of its development. Where there was potential for significant environmental impacts, the SEA identified potential avoidance, mitigation or enhancement measures, many of which were incorporated into revised policies or associated implementation proposals within the Plan. In accordance with the Environmental Assessment (Scotland) Act 2005, the SEA Environment Report was subject to public consultation alongside the Plan.

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<sup>1</sup> SSMEI Clyde Pilot (March 2009) Draft Firth of Clyde Marine Spatial Plan (105pp)

<sup>2</sup> SSMEI Clyde Pilot (March 2009) Draft Firth of Clyde Marine Spatial Plan Strategic Environmental Assessment: Environment Report

Both documents can be downloaded from the project website <http://www.clydeforum.com/ssmei/>

## 2 CONSULTATION PURPOSE AND PROCESS

### 2.1 Purpose of Consultation

The public consultation on the draft Plan had two main aims. The first was to gather views on the Plan itself, particularly with respect to its overall policy direction, specific policies, and implementation proposals. Comments on these aspects will assist in the future revision and trial implementation of the Plan. The second aim focuses on the role of the SSMEI as a pilot project informing the ongoing development of statutory marine planning, particularly at a regional level, within Scotland. In this context, the view of consultees on aspects such as the Plan's remit, approach and the processes used in its development are of particular interest.

The consultation on the draft SEA Environment Report was intended to promote transparency with respect to the process by which the Plan was developed. Under the Environmental Assessment (Scotland) Act 2005, SNH, SEPA and Historic Scotland are statutory Consultation Authorities for SEA and as such were required to respond to this consultation.

### 2.2 Consultation Process

The SSMEI Clyde Pilot was tasked from the outset with the development of mechanisms to deliver integrated and sustainable management of marine and coastal areas of the Firth of Clyde through a voluntary stakeholder-regulator partnership. Such a partnership body, based upon the core group of the existing Firth of Clyde Forum, acted as the Steering Group for the project. Twenty-nine bodies were represented on the Steering Group (see Appendix 2 of the Plan) and the Plan was a consensus document developed in close consultation with this group, including 13 formal meetings over 33 months.

The importance of wider consultation with stakeholders was also recognised from the outset of the project, although scope for this was somewhat limited both by the resources available (project staffing equivalent to 1.6 full time posts) and by the strategic nature of the Plan, which covers a large, highly populated area. A conference with workshops, attended by over 70 people, was held in collaboration with the Firth of Clyde Forum, early in the process (November 2006). This included presentations on experiences of marine spatial planning from the UK and overseas and gathered views on marine spatial planning and its application to the Firth of Clyde.

The project team also undertook a study of the interactions among sectors and associated activities in the Firth of Clyde. Given the strategic nature of the Plan, this was mainly targeted at umbrella organisations with Firth-wide interests including business federations, sports associations, government agencies and NGOs. Questionnaires were completed by representatives of 26 out of 34 organisations contacted and one-to-one interviews were conducted with 22 representatives. These and others were also invited to participate in facilitated workshops to determine vision, drivers, and strategic positions and options for the conservation and biodiversity, inshore fisheries, shipping and transport, recreation and tourism and mariculture sectors.

The outcomes of the sectoral interactions study also informed the SEA process, including the development of a scoping report, which was itself subject to statutory scrutiny by the Consultation Authorities (SNH, SEPA and Historic Scotland). Their comments on the SEA scoping report were taken into account when preparing the draft Environment Report.

### **2.2.1 Public Consultation on the Draft Plan**

The draft Plan and associated SEA Environment Report were launched on 31 March 2009. The launch was attended by 55 people, out of a total of 187 invited, representing organisations with an interest in the management of the Firth of Clyde. At the launch and in the following weeks, some 300 print copies of the draft Plan and Non-Technical Summary of the Environment Report were distributed to stakeholders across the Clyde and beyond. The Plan and all supporting documents were also web-published. Comments could be submitted by web form, e-mail or post.

The public consultation period lasted for just over 12 weeks, ending on 26 June 2009. In advance of and during the consultation period, a commercial distribution company was engaged to distribute some 20,000 information leaflets to 377 outlets throughout coastal regions of the Firth of Clyde. Over 500 leaflets were also posted directly to contacts on the Firth of Clyde Forum's database. These leaflets included information on how to access the Plan and associated documents plus a FREEPOST return slip to request further information.

During the consultation period, nine public information events were held in communities around the Firth (Inveraray, Lochgilphead, Largs, Campbeltown, Helensburgh, Brodick, Ayr, Glasgow and Gourock) and the project also exhibited at Fishing Expo 2009. The consultation events were advertised in the local press and on posters and advance information was also sent to Community Councils. In the course of these events a further 180 copies of the Plan and NTS were distributed.

The level of response to this consultation process is detailed in section 3 and the comments received are summarised in section 4.

## **3 NUMBER AND ORIGINS OF RESPONSES RECEIVED**

A total of 38 organisations or individuals (Appendix 1) submitted comments on the draft Plan or SEA report. The origins of these submissions are summarised in Table 1. Over a third (14) of the responses were from members of the public, including eight from residents on Arran. Of the remaining 24 comments, seven were from local or regional planning authorities and four from Scottish or UK Government bodies, including the three statutory SEA consultees (SEPA, SNH and Historic Scotland). The remaining 13 responses included five from community councils or other community groups.

Twelve of the responses were from organisations with a Scotland-wide remit, ten were from groups or individuals on Arran and seven originated within the greater

**Table 1 Number and Origins of Comments Received on Draft Plan and SEA Report**

Geographical origin / area of interest	Scottish / UK Government Dept /Agency	Planning Authority	NGO	Community Council or Group	Sports Association	Commercial company or association	Public Utility	Research body	Individual	TOTALS
Greater Glasgow and Clyde Estuary <sup>a</sup>		3		1					3	7
Cowal and Bute <sup>b</sup>		1		1					1	3
Other Argyll <sup>c</sup>		1 <sup>d</sup>		1						2
Arran				2					8	10
Ayrshire		2							2	4
Scotland-wide <sup>e</sup>	4		2		2	2	1	1		12
<b>TOTALS</b>	<b>4</b>	<b>7</b>	<b>2</b>	<b>5</b>	<b>2</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>14</b>	<b>38</b>

<sup>a</sup> Including Glasgow City, East Renfrewshire, Inverclyde, West Dunbartonshire, Helensburgh and Rosneath peninsula

<sup>b</sup> Including coastal areas falling under jurisdiction of Loch Lomond and Trossachs National Park Authority

<sup>c</sup> West side of Loch Fyne plus Kintyre

<sup>d</sup> Argyll and Bute Council response

<sup>e</sup> remit / area of interest covers all of Scotland

Glasgow and Clyde estuary area. The remaining responses were spread across the Clyde, including Ayrshire, Cowal and Kintyre.

It should be noted that a number of organisations placed caveats on their responses, given the context of the Plan as a non-statutory draft document. In particular, with the exception of Argyll and Bute Council, responses from Local Authorities had been prepared by relevant officers but had not been subject to formal approval by Council Committees.

The full text of those comments for which permission was given for publication (Appendix 1) will be placed on the SSMEI Clyde Pilot website at [www.clydeforum.com/ssmei](http://www.clydeforum.com/ssmei)

## 4 COMPILATION OF COMMENTS

Submissions varied greatly in their length, scope, structure and detail and in all ran to some 135 A4 pages of text (excluding background attachments). Some made one or two brief generic points while others contained very detailed comments on a wide range of issues, often cross-referenced to particular sections of the Plan or Environment Report text. Expressions of opinions on issues not directly related to the Plan, or to marine management in the Firth of Clyde or Scotland as a whole, are not considered within this report.

A number of submissions included notifications of spelling, grammatical or typographical errors within the draft Plan. Various suggestions were also made regarding clarity of wording or ordering of text that did affect actual substance or meaning of the text. All of these types of comments have been noted for use when preparing the revised Plan, but are not considered further within this report.

Similarly, specific comments on aspects of layout or presentation (e.g. concerning use of shading or keys in particular diagrams, use of fonts, ordering of paragraphs etc.) are not considered within this report, but have been noted and will be referred to during the Plan revision process. Generic issues of presentation are identified in Table A2d.

### 4.1 Grouping of Substantive Comments

In order to analyse the substantive comments received, these were extracted from the submissions and grouped as follows (within Appendix 2):

- comments identifying issues or making suggestions for future management of the Firth of Clyde or Scotland's seas in general without expressing a view on the relevance of the Plan or SEA Environment Report to these issues/suggestions (Table A2a)
- comments on the scope or remit of the SSMEI Clyde Pilot and Plan (Table A2b)
- comments on the substance of the draft Plan (Table A2c), including:
  - topics or issues considered or not considered
  - overall approach

- accuracy and comprehensiveness of contextual information
  - policy direction
  - proposed implementation
- generic comments on the format or presentation of the Plan (Table A2d)
  - comments on the process by which the Plan was developed (Table A2e)
  - comments on the SEA Environment Report (Table A2f)

The tables in Appendix 2 also include the SSMEI Clyde Pilot's responses to the comments received. The following section identifies a number of key themes that emerged from the consultation.

## 5 THEMES EMERGING FROM CONSULTATION

As detailed in section 2.1, the overarching purpose of the consultation was to gather views to assist both in future revision and implementation of the draft (voluntary) Plan for the Firth of Clyde and in the ongoing development of statutory marine planning, particularly at a regional level, within Scotland.

Many respondents recognised and welcomed the draft voluntary Plan as a useful first step in the development of (statutory) Marine Spatial Planning in the Firth of Clyde and more widely in Scotland. There was also general explicit support for the Plan's vision and tacit support for many of the Plan's policies and proposals, particularly in relation to the environment. However, as would be anticipated in any such consultation exercise, most of the comments concerned what respondents disliked, either about the content of the draft Plan itself or the remit given to the SSMEI Clyde Pilot or the process by which the Plan was developed. The following text identifies a number of key themes that emerged from the consultation comments as a whole. ***Where comments concern generic aspects of the Plan, SSMEI Clyde Pilot's responses to these themes are also included, in bold italicised text, for ease of reference.*** These responses were initially drafted by the Project Officers and were then reviewed and discussed by members of the Steering Group.

### 5.1 Remit

The Plan's overarching remit to deliver sustainable development through an ecosystem approach was explicitly welcomed by a number of respondents (e.g. RSPB, LLTNPA). However, the comments on remit highlighted differences in opinion as to the overall purpose of marine planning, and in particular whether it should primarily be about conservation or restoration of natural resources and/or biodiversity or about forward, sustainable, development of sectors such as mariculture, fisheries and recreation and tourism. Several respondents, including COAST and others on Arran, together with representatives of sea angling interests (e.g. SSACN, A. Wass) felt that a primary focus of the Plan should be on restoration of biodiversity, including fish stocks for recreational angling and that, in this context, at least some aspects of management of inshore fisheries stocks should be included within the Plan's remit (rather than lying with the Clyde Inshore Fisheries Group). SNH felt that nature of relationships between IFGs and SMR partnerships should be clarified prior to implementation of statutory marine planning.

RSPB welcomed the recognition within the Plan that fisheries development should focus on increasing value rather than quantity of stock removed, but, along with SNH, felt that

the Plan should explicitly recognise that biodiversity protection measures could also benefit the fisheries sector itself. Several respondents (e.g. COAST) wanted to see the establishment of Marine Protected Areas, including (trawl and dredge) fisheries no-take zones within the Clyde (N. Gill, Strachur CC) in order to protect sensitive habitats and species.

Some were disappointed that the remit was to develop the Plan within existing statutory mechanisms and felt that these should have been challenged by the Plan (e.g. J Campbell). The remit of the Pilot to develop sectoral development plans was seen as problematic by some respondents (e.g. RSPB), and some (e.g. Crown Estate) felt that there had not been sufficient integration of sectoral policies with those relating to environmental management or communities.

***Comments on remit and on the relationship between marine planning and fisheries management will be passed to Marine Scotland for consideration in ongoing development of a statutory marine planning regime. With respect to the sustainable development remit given to the SSMEI Clyde Pilot, this aligns with the Scottish Government's central policy direction; to deliver sustainable economic growth. The experience of developing the Plan has served to highlight some of the practical difficulties for Planners in adopting an ecosystem-based approach to underpin sustainable development and, in their response, SNH have recognised the desirability of developing guidelines on this for future marine planners.***

***The creation of Marine Protected Areas was outwith the scope of the voluntary pilot project, but the Marine (Scotland) Bill includes provision for this and the development of other marine biodiversity conservation measures.***

***The sectoral planning approach tested by the Clyde Pilot will be considered in depth in the final report of the pilot to Scottish Government.***

## 5.2 Voluntary Approach

A number of comments focused on the voluntary, consensus building, approach adopted in developing the Plan. Concerns were expressed about the extent to which such an approach can deliver the Plan vision and succeed in balancing sectoral wants against long-term (environmental) sustainability (e.g. RSPB, S. Campbell). A number of respondents felt that statutory marine planning is required to address potential tensions or conflicts between policy areas and to enable development of more specific policies (e.g. Ayrshire Joint Planning Unit). Several (e.g. COAST, SNH) felt that Lamlash Bay should not be cited as an example of a voluntary approach as it has statutory underpinning.

***The experience of developing a voluntary Plan will be fully reported on by the project team and steering group to Scottish Government in the final project report. However, while this draft Plan is voluntary, future (regional) marine plans in Scotland will be statutory under the forthcoming Marine Act. Lamlash Bay was chosen as an example as it underlines the complexities of establishing conservation areas in the marine environment under the currently available mechanisms. The Lamlash Community Marine Nature Reserve is statutorily underpinned by Inshore Fishing Legislation following voluntary participation in negotiations between parties to the Lamlash Bay Working Group.***

### 5.3 Evidence Base

The nature and extent of the evidence base required for policy development, was a key issue for several respondents who felt that sufficient data are already available to develop policies on issues such as fisheries or mariculture impacts on environmental features (e.g. COAST, K Sangster). A related issue centred round what should be identified as desired ecosystem status, with several respondents (e.g. Isle of Arran CC, COAST, J. Campbell, SSACN) suggesting that the Plan should take condition 30-50 years ago as desired baseline and that the status of whitefish stocks should be adopted as one condition measure (e.g. S. Campbell).

***The bespoke Review of Biodiversity highlighted extensive gaps in data coverage within the Firth of Clyde (see diagrams 7 and 8 in the Plan). As detailed in Appendix 3, this also served to highlight some generic difficulties in applying SeaSearch habitats data to marine planning, which need to be addressed at Scottish and UK levels. Many of the policies and proposals in the Plan focus on addressing data gaps, including locations of priority species/habitats and their sensitivities to various activities, to enable more detailed spatial planning in future. The baseline State of the Clyde report identified trends in condition of key aspects of the environment to inform both identification of issues and future monitoring. At a Scottish level, Marine Scotland is working on development of Marine Ecosystem Objectives which will inform future (statutory) Planning***

### 5.4 Consultation

Some respondents (e.g. COAST, SSACN) felt that there had been insufficient community consultation, particularly with residents of Arran, in the process of plan development and that the project Steering Group was biased towards commercial sectoral interests.

***These concerns highlight the difficulties for a strategic planning team, with very limited resources, of consulting with local communities (the littoral strip around the Firth of Clyde has a population, in 2001, of 387,300 including around 5,000 permanent residents on Arran). However, considerable efforts (as detailed in section 2.2.1) were made with respect to the public consultation on the draft Plan, including an event on Arran. The SSMEI Clyde pilot steering group included representatives from 29 different bodies, including local authorities and conservation NGOs. The project team will also consider and make recommendations on public consultation aspects for future statutory regional marine Plans within the final project report to Scottish Government. One suggestion is earlier public consultation on an “Issues” report.***

### 5.5 Overall Plan Structure

The Plan was widely felt not to be spatial enough in its approach (e.g. SNH, Argyll and Bute Council, Crown Estate), particularly if it were to be used to guide future developments in the Firth of Clyde. Various suggestions were made to enhance the spatial aspect, including: mapping of areas potentially suitable for different uses (including biodiversity protection); spatial analysis of constraints based on the sectoral interactions work and on identification of sensitivity of habitats/species to particular activities; division of the Firth into smaller planning units having distinctive characteristics; and, development of sub-plans for particularly busy areas.

***This limitation of the Plan is fully acknowledged and arises from the decision taken early on, in the context of SSMEI seeking to test different approaches to***

**development of marine plans, to focus on establishing strategic policy directions for the Firth as a first step towards the development of a spatial Plan. Resource constraints did not permit further progress towards development of the spatial aspect within the original project timeframe. However, many of the implementation proposals included within the draft Plan are focused on gathering data and/or undertaking analyses to enable future revisions of the Plan to be made more spatial.**

Some respondents (e.g. SNH) also felt that key elements of the Plan development (sectoral interactions study and SEA) might have been better integrated into the Plan

**Innovative approaches were taken to integrate these elements within the draft Plan. In particular summary SEA and sectoral interactions findings were included within policy chapters. These were explicitly cross-referenced to relevant policies within the Plan that might assist in managing interactions between sectors, or in mitigating or enhancing potential environmental impacts.**

A number of respondents felt that a number of policies within the Plan were more akin to proposals/actions and should have been identified as such (e.g. RSPB, Argyll and Bute Council).

**The structure of the Plan, including hierarchy of policies and proposals will be reviewed during the revision process.**

## 5.6 Specific Policies and Policy Gaps

### 5.6.1 Environment

There was wide-ranging support for the environmental policies. Several bodies (e.g. West Dunbartonshire Council, Argyll and Bute Council) recognised the importance of the information gathering and analysis policies and proposals to future development of more spatially focused development policies, but others (e.g. COAST) felt that further information gathering was overemphasised. Several respondents (e.g. GRAB, East Esplanade Protection Group) particularly welcomed the inclusion of policies and associated implementation proposals concerning development of a coordinated litter monitoring and management strategy.

**Policies must be robust and evidence-based, hence the focus on targeted information gathering to inform future Plan revision**

### 5.6.2 Communities and Heritage

There was general support for the aspirations of the communities and heritage policies but some concerns about the wording of policies COM1 and COM2 (e.g. Argyll and Bute Council, Crown Estate, SNH), which **will be considered when finalising the draft Plan.**

### 5.6.3 Recreation and Tourism

The main reservations expressed were that a number of leisure activities, notably wildlife-based recreation and tourism (RSPB); coastal walking (East Esplanade Protection Group); and, sea angling (SSACN, A. Wass, Furnace Community Council, COAST) were not considered.

***Some of the proposals relating to development of infrastructure for marine recreation might also indirectly benefit ecotourism and or sea angling, but these aspects will be considered more fully, along with coastal recreation, in the revised Plan.***

#### **5.6.4 Shipping and Transport**

It was suggested that more emphasis should be given to the role of ferries in carrying freight (Glasgow City Council) and tourists (LLTNPA) and to proposals for the development of a Clyde waterbus service (Argyll and Bute Council). The importance of road links to ports in rural areas was highlighted (Argyll and Bute Council).

***These aspects will be considered more fully when revising the Plan.***

#### **5.6.5 Mariculture**

The global sustainability of finfish mariculture was contested by a number of respondents (e.g. COAST, Isle of Arran CC) while more local impacts on migratory salmonids, and hence freshwater angling (e.g. Anon Arran) and/or water quality (e.g. J. Meade) were identified as concerns. A number (e.g. J. Graham, RSPB, SNH) felt that mariculture policies were overly biased towards sectoral wants, rather than sustainable development.

***The draft Plan was prepared within the current Scottish Government policy framework and, as such, is intended to assist in delivery of Scottish Government policy on mariculture as set out in A Fresh Start: The renewed strategic framework for Scottish Aquaculture, published in May 2009.***

SNH and RSPB suggested amalgamation of policies MAR1 & 2 to include development of guidance on sites with potential for future development, including consideration of regional constraints beyond current Marine Scotland guidelines.

***This aspect is implicit in policy MAR2 and associated proposals for the development of an integrated mariculture strategy. This will be made clearer in the revised Plan.***

#### **5.6.6 Fisheries**

Concerns raised by a number of respondents concerning fisheries stock and/or impacts management are outlined in section 5.1.

#### **5.6.7 Policy Gaps**

Various respondents identified a number of issues, (sub)sectors or activities which they felt were missed or given insufficient emphasis. These included:

- Defence (I. Hunter) ***Defence is a reserved matter that does not fall under the control of a (voluntary) Marine Plan.***
- Climate change impacts (RSPB) and coastal flood risk management (RSPB, SNH, South Ayrshire Council) ***These aspects, including linkages to implementation of the Flood Risk Management Act, will be considered more fully in the revised Plan.***

- Waste water discharges and associated infrastructure (Scottish Water). ***These aspects will be considered more fully in the revised Plan.***
- Opportunities for environmental interpretation and education, marine research, and for vocational training for maritime sectors (SAMS; J. Meade, RSPB, East Esplanade Protection Group, Glasgow City Council). ***Many of the actual developments or activities envisaged in these contexts would fall under the remit of other policy instruments or agencies. However, the draft Plan does highlight various research priorities and the revised Plan will seek to further emphasize the importance of raising awareness of the marine environment in the context of community development.***
- Landscape/seascape (Argyll and Bute Council) ***A desk-top study, by a landscape architect, was included within the State of the Clyde Report. Proposal 8 (Carry out a seascape/landscape analysis for the Firth of Clyde), recognises that this aspect would benefit from further work.***
- Maritime culture (GCC) and potential for novel art works (W. Graham). ***Further consideration will be given on how cultural aspects might be captured within policies relating to communities.***
- The (cumulative) impact of coastal developments (G. Dunn). ***This aspect is implicit within the Plan, which establishes strategic frameworks for the whole Firth. It is also recognised by the SEA. Revision of Policy ENV 6 to explicitly consider cumulative impacts will be considered.***

### 5.7 Linkages to Other Plans

Terrestrial planning authorities (e.g. GCVSDPA, Argyll and Bute Council, LLTNPA, Ayrshire Joint Planning Unit, West Dunbartonshire Council) and others (e.g. Scottish Water) broadly welcomed the linkages recognised in the draft Plan with other types of Plan, including terrestrial development plans. However, some felt that the mechanisms whereby such linkages could be implemented needed more exploration, including with respect to RBMPs. Several respondents suggested that boundaries of future SMRs should coincide with those for other key management tools, including RBMP and IFGs (SSACN, Scottish Water). The balance of planning, and ultimately resource, focus between marine, riverine and coastal elements was of concern to some (e.g. J. Graham).

The difficulty of developing a Regional Marine Plan in the absence of a National Plan was recognised by Scottish Water, who are concerned that there should be a "consistent approach" across regional plans.

***It was challenging to develop the Clyde Plan in the absence of a National Plan, but the SSMEI pilots will provide valuable lessons to inform possible future relationships between National and Regional Marine Plans. It is recognised that the relationship with River Basin Management Plans (RBMP) merits further exploration in the revised Clyde Marine Spatial Plan.***

### 5.8 Implementation

Responses to the specific proposals in the action plan were generally very positive, with some suggestions for prioritisation (e.g. Argyll and Bute Council, West Dunbartonshire Council) including those necessary for revision of Plan (RSPB).

There was broad support for the proposals that initial trial implementation of the Plan, pending commencement of statutory marine planning, should be taken forward by a group based around the FoCF. However, local authorities and some other public bodies expressed concerns about availability of additional resources to enable voluntary implementation of key proposals within the Plan, while Scottish Water raised wider questions about what might be anticipated of such bodies within the forthcoming statutory system. There were also concerns expressed about the difficulties inherent in meshing the provisions of a voluntary plan within the terrestrial planning system.

Others were concerned that membership of the implementation body should be fully representative of stakeholders and that its operation should be transparent (e.g. SSACN, COAST, S. Campbell). It was also recognised (e.g. S Ayrshire Council) that any expansion to membership might necessitate restructuring if not to become too unwieldy. There were a number of related comments on the proposed composition and remit of the proposed implementation body (e.g. RSPB felt that staff needed to be given decision making, rather than facilitation, role in order to identify optimal solutions to managing conflicting needs). West Dunbartonshire and Argyll and Bute Councils highlighted the need for monitoring of Plan outcomes.

***One of the functions of the Clyde Pilot is to trial implementation of a voluntary Marine Spatial Plan. This process will allow inherent tensions between inclusivity and workability within implementation bodies to be explored. The resourcing of this phase is a matter for Scottish Government in consultation with partner organisations. No decisions have yet been made concerning the role or composition of any regional planning bodies under a Marine (Scotland) Act. It is recognised that the monitoring aspect for the Plan (which is presently considered within the draft Environment Report) needs to be further developed.***

## **5.9 Strategic Environmental Assessment**

Comments concerning the Strategic Environment Assessment of the draft Plan are given in Table A2f along with responses to these comments. The SEA was commended by SNH for being started early and developed in parallel with the Plan and overall was felt to be comprehensive, high quality and well reported (RSPB, Historic Scotland, SEPA).

Some comments (e.g. S. Campbell) reflected some misunderstanding of the purpose of the SEA, which was to assess the potential impacts of implementation of the Plan, relative to the *status quo* with respect to marine management in the Firth of Clyde, rather than the overall impacts of particular sectors or activities.

Other comments focused on the identification of avoidance/ mitigation/ enhancement measures and their integration within the Plan (SNH, RSPB).

***It is accepted that some additional work on mitigation/enhancement and monitoring elements will be desirable in the process of Plan revision***

**APPENDIX 1 ORGANISATIONS AND INDIVIDUALS WHO SUBMITTED COMMENTS**

Organisation or Individual	Origin	Comments submitted on		Full response on website
		Plan	SEA	
Anon (name and address supplied)	Argyll and Bute	x		Yes
Anon (name and address supplied)	Arran	x		No
Argyll and Bute Council (approved by Council's Executive Committee)	Argyll and Bute	x		Yes
Campbell, John M.	Arran	x		Yes
Campbell, Sally	Arran	x	x	Yes
Community of Arran Seabed Trust (COAST)	Arran	x		Yes
The Crown Estate	Edinburgh	x		Yes
Dunn, Gavin	Ayrshire	x		Yes
East Esplanade Protection Group	Argyll and Bute	x		Yes
Furnace Community Council	Argyll and Bute	x		Yes
Gill, Nick(y)	Arran	x		Yes
Glasgow City Council (Planning Department)	Glasgow	x		Yes
Glasgow and the Clyde Valley Strategic Development Planning Authority	Glasgow	x	x	Yes
GRAB Trust (within Argyll and Bute Council submission)	Argyll and Bute	x		Yes
Graham, James	W Dunbartonshire	x		Yes
Graham, William	Lanarkshire	x		Yes
Henderson, James	Arran	x		Yes
Historic Scotland	Edinburgh		x	Yes
Hunter, Ian	Glasgow	x		Yes
Isle of Arran Community Council	Arran	x		Yes
Keep Scotland Beautiful	Stirling	x		Yes
Lighthouse Caledonia Ltd	Ross-shire	x		No
Loch Lomond and The Trossachs National Park Authority (LLTNPA)	Balloch	x		Yes
Meade, Jenny (Arran Community Councillor for Lamlash)	Arran	x		Yes
North Ayrshire Council	Ayrshire	x		Yes
Royal Society for the Protection of Birds Scotland	Glasgow	x	x	Yes
Royal Yachting Association Scotland	Edinburgh	x		Yes
Sayer, Kathy	Arran	x		Yes
Scottish Association for Marine Science (SAMS)	Argyll and Bute	x		Yes
Scottish Fishermen's Federation/ Clyde Fishermen's Association	Argyll and Bute	x	X	Yes
Scottish Environment Protection Agency (SEPA)	East Kilbride		x	Yes
Scottish Natural Heritage (SNH)	Clydebank	x	x	Yes
Scottish Sea Angling Conservation Network	Angus	x		Yes
Scottish Water	Dunfermline	x		Yes
South Ayrshire Council	Ayrshire	x		Yes
Strachur Community Council	Argyll and Bute	x		Yes
Wass, Anthony	Ayrshire	x		Yes
West Dunbartonshire Council	W. Dunbartonshire	x		Yes
Whitmore, Malcolm	Arran	x		Yes

## APPENDIX 2 DETAILS OF CONSULTATION COMMENTS RECEIVED

Note that Tables A2a to A2f do not replicate the full text of all the comments received in response to the consultation. Rather they are intended to highlight the substantive issues raised by all of the respondents. Where permissions have been given, the full text of responses will be made available to view on the project website ([www.clydeforum.com/ssmei](http://www.clydeforum.com/ssmei)). Use of square brackets [ ] within quotations lifted from comments indicate that the text has been paraphrased in the interests of brevity.

**Table A2a Comments Identifying Issues of Concern and/or Suggestions for Marine Management**

Comments/Concerns	Origin	Response
<p>"During 40 years...I have seen many developments which have completely spoiled huge areas for ever". Current (terrestrial) planning system perceived as evaluating individual applications "on economic and political grounds" and failing to consider the question "how does this [Planning Application] affect the long-term future of the Firth as a whole?" Suggestion that there should be a group of "clever people who understand all the issues" to act as "Caretakers of the Clyde" who would be "answerable only to Holyrood" and who would have legal authority to scrutinise and "veto or change...every planning application that affects the waterfront in any way" from "Ballantrae to Campbeltown."</p>	G.J. Dunn	The Plan is strategic in nature of plan and aims to encourage Firth-wide approach to development and preservation of the defining features
<p>With respect to future statutory marine planning at national and regional levels: wish to participate...[but] not clear what resources will be required from Scottish Water in terms of stakeholder involvement or how the process will be financed ...cannot commit to full participation in the process until it is clear what it is anticipated our role will be at National and Regional level".</p> <p>"the NMP should set the framework for RMP to work within, the level of scope and flexibility available to RMP should be set out within the NMP to ensure that there is a degree of consistency across the Scottish Marine Regions (SMR). While seeing the need for a degree of flexibility with regard to developing RMP that are applicable to a local area, this approach can cause difficulties for organisations such as Scottish Water that operate and provide a service to customers Scotland wide ...we would hope that a consistent approach will be adopted for the format of Marine Spatial Plans".</p>	Scottish Water	<p>Comments Noted and passed to Marine Scotland</p> <p>Comments Noted and passed to Marine Scotland</p> <p>It was challenging to develop the Clyde Plan in the absence of a National Plan, but the SSMEI pilots will provide valuable lessons to inform possible future relationships between NMP and RMP.</p>
<p>"Your remit is to look at the future of the Clyde. I have real concerns about what is happening <u>today</u>". Specific concerns detailed are:</p> <ul style="list-style-type: none"> <li>• loss of coastal leisure facilities (such as swimming pools, putting greens, boating ponds) "seems that when councils make cuts leisure is the first to go"</li> <li>• restriction on access to places formerly used for leisure activities such as Machinroy Point (for fishing), Ardrossan Harbour area (diving) and loss of infrastructure (e.g. "Fairlie Pier demolished rather than refurbished – this was...used by anglers for many years")</li> </ul>	Tony Wass, A.S.W. Fishing Charters	Comments Noted and will be passed on to Local Authorities.

Comments/Concerns	Origin	Response
<p>“Originally the Firth of Clyde Forum was the Clyde Estuary Forum. Interest has shifted from the estuary to the coast – from the river to the sea. This reflects a widespread failure to value the R. Clyde in its own right...it’s all want and take and no one wants to put anything back. That’s a shame because the river supported everything.”</p>	James Graham	Comments Noted
<p>“Fish stocks in the Clyde have collapsed and though not biologically extinct they are now commercially and ecologically extinct and no longer perform functional roles in the Firth of Clyde ecosystem thus making the environment less biologically complex and less resilient to environmental fluctuations.”</p>	SSACN	Changes in fish stocks are recognised in the baseline State of the Environment Report. At Scottish level, Marine Scotland is working on development of Marine Ecosystem Objectives which will inform future (statutory) Planning
<p>“The Clyde is now in a desperate situation with no white fish of usable proportions, prawns being the only commercial species..... [and] multiplying as there is no white fish to curtail their growth. Like wise the Clyde area is now experiencing an unusually magnitude of jelly fish. This can only be because again there is no young fish to mop up the minute young jelly fish”.</p>	Jim Henderson	See above
<p>“I came to Arran as a wholistic (sic) pharmacist about four years ago and was first made aware of the considerable change in biodiversity and Ecological Balance by the huge number of people who need urgent medical attention to avoid anaphylactic shock as a result of Jelly Fish stings. Jelly fish are a product of over fishing...”</p> <p>“As far as I know there is still only one small fishing boat operating from Arran, and NO LOCAL FISH for sale on the island...I have seen amazing historic pictures which illustrate the past prolific white fish population of Lamlash Bay”.</p> <p>“I have <b>never</b> been in the sea since living on Arran because of the obvious contamination due to sub-standard human sewage disposal...salmon excrement and disease [and]...the jelly fish”</p>	Jenny Meade	See above.  Disposal of sewage and compliance with relevant legislation ( e.g. Water Environment and Water Services (Scotland) Act 2003 and Water Services etc (Scotland) Act 2005) is an issue for Scottish Water and SEPA
<p>“I [am] keen to try to see what can be done to restrict/remove the bottom drag trawlers from operations in...upper Loch Fyne...[which has] abundant fields of [the rare Fireworks Anemone which is found in very few locations]...my personal experience is that the loch sustains a very large community...a bottom dragging trawler simply chops these animals in two and mulches them; hence the fleshy debris I have witnessed following [passage of] a bottom dragging fishing boat. Upper Loch Fyne has a very slow water change and limited O2 and [hence has] an almost unique underwater sedentary flora and one that does not recover easily...hence [my] concerns.”</p>	Anon	The scope of the SSMEI Pilot projects excluded (local) management of (inshore) fish stocks, which falls to Inshore Fisheries Groups (IFG) which are charged with production of Management Plans. Also of note is that the Scottish Marine Bill includes mechanism for creating MPAs.

**Table A2b Comments Concerning Scope and Remit**

Comments/Concerns	Origin	Response
<p>“Welcome publication of [the Plan] as step towards informing implementation of statutory local plans in Scotland” and “pleased to see the ecosystem approach and principles of sustainability...underpinning this document.”</p>	RSPB	Comments Noted
<p>“The challenge for the Plan is not to find out what individual sectors are doing and want to do but to find and map the way to deliver the optimum combination of activities to achieve the plan vision. A partnership approach of consensus building will deliver a lot...[but] at some point professional judgement will need to be used to produce a Plan that cannot deliver the wants of all sectors but delivers the best way of achieving the Plan vision.”</p>	RSPB	Without knowing how and where sectors want to develop planners cannot consider mechanisms for integrating wants with other sectors and with environmental and social considerations.
<p>“We have a general concern that the emphasis on voluntary approaches is over stated within the Plan. We recognise that the voluntary approach has a role to play, but this should be in the context of a robust, effective and easily understood statutory framework. Currently the reader could be left with the impression that there is an expectation in favour of voluntary over statutory approaches in the Marine Spatial Planning”</p>	SNH	The remit was to consider the potential of the voluntary approach in managing Scotland’s marine and coastal waters. What has been developed is a voluntary plan for the Firth of Clyde. The policy environment has changed dramatically and a Marine Bill is currently before the Scottish Parliament, which will deliver statutory marine planning.
<p>“Key objective is development and implementation of a VOLUNTARY Marine Spatial Plan for natural resource use. This is to be questioned as voluntary is often viewed as a good way to prevent development of good sustainable practice.”</p>	Sally Campbell	See response above.
<p>“Action has to be statutory now, with the new Marine Bill .....dropping litter is illegal. How does dropping one piece of litter compare to what a scallop dredger can do in an hour, or overpopulation of a marine salmon farm? SSMEI will completely fail without regulation and policing.”</p>	Jenny Meade	
<p>“[fishermen] will not VOLUNTARILY reduce their carbon footprint by ensuring that their boats are efficient, nor will they pay a little bit extra to ensure that their fishing nets and methods are ecologically acceptable for a sustainable future”</p>		
<p>“protection of habitats and species [suggested as being] ‘voluntary’. Who is going to start protecting areas of the sea in the same way that areas of land have had protection for decades?”</p>		This is currently being considered by Marine Scotland and Scottish Government. The Scottish Marine Bill includes mechanisms for creating Marine Protected Areas (MPAs).
<p>“Plan is all about <u>use</u> of the Clyde – hasn’t it deteriorated alarmingly over the last 50 years? Who is going to stop the <u>abuse</u> [by electrofishing and scallop dredging]...let’s lead the world in brave policies that stop the destruction and then start collecting data rather than the other way around”</p>	Kathy Sayer	The remit of the Plan was to deliver sustainable development of sectors within the Firth of Clyde. See also comment above.

Comments/Concerns	Origin	Response
<p>“Disappointed that [fishing] section does not recognise value to fishing industry of conserving fish stocks” “Plan must help make fisheries management in the area part of the solution to deliver sustainable seas, rather than remaining a problem in itself” “RSPB supports a Scottish fishing industry which takes the ecosystem approach to fisheries management...the Plan should help Clyde fishing businesses achieve this aim.”</p>	RSPB	<p>The scope of the SSMEI Pilot projects excluded (local) management of (inshore) fish stocks, which falls to Inshore Fisheries Groups (IFG) which are charged with production of Management Plans.</p>
<p>“the biggest impact on the Clyde and its biodiversity is the fishing industry which is not in your remit .How can you achieve any of your goals regarding your commitment to achieving biodiversity in the Clyde without taking into consideration the damage inflicted by commercial fishing .Over exploitation of this natural recourse over the past decade has reduced the seabed to little more than a ploughed field...I run a diving/angling vessel and have seen the deterioration of the seabed over the past 25 years My divers comment how bad it has become. I can if required provide you with proof of these observations”</p>	Tony Wass, A.S.W. Fishing Charters	<p>Though this draft Plan and future Regional Marine Plans may not include fish stocks within their remit there is the potential to indirectly manage areas through the use of MPAs and other measures proposed within the Marine (Scotland) Bill for the protection of natural heritage interests.</p>
<p>“From the sea anglers’ point of view, it is difficult to see what the SSMEI will do to address the well understood stock / infrastructure / development issues, many of which were identified as far back as 1988 in the Scottish Tourist Board initiated Clyde Sea Angling Study.”</p>	SSACN	<p>The scope of the SSMEI Pilot projects excluded (local) management of (inshore) fish stocks, which falls to Inshore Fisheries Groups (IFG) which are charged with production of Management Plans.</p> <p>With regards to infrastructure and development issues the Plan should have some impact. However it is recognised that there are no specific policies for sea angling in the draft Plan.</p>
<p>“appreciate the amount of voluntary work that has gone into the Plan and the good intentions that lie behind it, but...consider it so flawed in the basic scope of its considerations as to be almost totally ineffective”</p>	Isle of Arran Community Council	<p>The Plan has been developed as part of a pilot project which has been set up to inform the debate on how Scotland’s marine and coastal waters can be better managed. The lessons learned through developing the Plan will feed into the development of future statutory marine plans. The process carried out by the project team has identified the strategic position of the stakeholders and regulators in the Firth of Clyde. This is a necessary step in developing a Marine Plan. With the necessary resources the Marine Region Boards, included in the Marine (Scotland) Bill, will build upon the work of all the SSMEI Pilot Projects and develop statutory Regional Marine Plans.</p>
<p>“How much [money] has been set aside for the SSMEI Clyde Pilot Scheme?...the price reflects the potential recognisable outcome and significance”</p>	Jenny Meade	<p>The expenditure on the SSMEI Clyde Pilot between its commencement in July 2006 and end of the consultation period for the draft Plan in June 2009 was £270,435</p>
<p>“is [there really] a need for such a wide ranging Marine Spatial Plan that encompasses all users, many of which like shipping, ferries harbours etc</p>	COAST	<p>The SSMEI Clyde Pilot has aimed to develop an integrated sustainable development plan for the Firth of Clyde.</p>

Comments/Concerns	Origin	Response
<p>are already, we feel, managed adequately. [We believe] that we need to look at what has been detrimental to the Clyde [and] address these issues. In our, and most scientific, opinion the largest problem in the Clyde is the collapse of fisheries and the un-sustainability of fin fish aquaculture. In our opinion the Government's remit to the Clyde SSMEI has been far too wide in most areas, but then missed the most important remit "consult with the People &amp; Communities" We feel the Government have wasted many years with this project while the health and biodiversity of the Clyde continues on its rapid decline." Refer to the South-West England "Finding Sanctuary" project which COAST regard as "a much more open and transparent project...with an emphasis on moving forward to fulfil UK commitments to set up a coherent network of MPAs by 2010-12".</p>		<p>The Scottish Government has also set up the Clyde Inshore Fisheries Group (IFG) whose remit is to develop a realistic Management Plan for the area. This plan will reflect local priorities and fit with wider national objectives for Scotland's inshore fisheries, fishing communities and the marine environment as a whole. The plan will also take account of the requirements and aspirations of others who are involved in or dependent on the inshore marine environment.</p>

**Table A2c Comments Concerning Substance of Draft Plan**

Page	Comments/Concerns	Origin	Response
<b>General Comments</b>			
	<p>“welcome and support publication of the [draft Plan] as the first step in the development of marine spatial planning for the Firth of Clyde”</p> <p>“As the process of marine spatial planning evolves and other important elements e.g. RBMP and the Scottish Marine Bill come into force [we] would wish to see more specific land use spatial elements [in the plan] which can then be translated, as appropriate, into [terrestrial development plans]...clearer statements about what elements ....could be translated in development planning would be useful.”</p>	GCVSDPA	<p>Comments Noted</p> <p>Comments Noted</p>
	<p>“Plan remains primarily an audit and issues report [which] cannot be said to be a true spatial plan...could be argued that the [Pilot] objectives have not been met” “recognise that this is important first step towards producing a [Clyde] Marine Spatial Plan.”</p> <p>Recognise limitations imposed by available resources and voluntary nature of the process.</p>	RSPB	The plan though titled a Marine Spatial Plan does not include a spatial element at this time. This in many ways is due to resource constraints. This document represents the strategic direction of the stakeholders and regulators within the firth of Clyde This stage is necessary to create a spatial dimension.
	“This is a very positive document.”	East Esplanade Protection Group	Comments Noted
	“welcomes the development of the [Plan] as an important step towards an overarching policy framework to facilitate the sustainable development of activities within the Firth.”	West Dunbartonshire Council	Comments Noted
	“Impressed by the laudably comprehensive draft [Plan].”	William Graham	Comments Noted
	<p>“[Plan] contains a great deal of useful material, however we believe that it is more akin to an overarching strategy or framework for marine management in the Clyde than a spatial plan...it should be possible to broadly map areas suitable for different uses and link this to the interactions work to highlight which activities might be able to co-exist in which areas. Without any clear spatial guidance it is difficult to see how the plan will be able to achieve its stated aim to ‘give direction and guide activities’ in the Clyde.”</p> <p>“recognise...some reluctance to define strict zones for different activities...but] zones can be used to split an area up into different sections, perhaps defined by their character, existing uses and suitability for different activities, within which more specific policies can apply...would encourage the pilot to trial further work on spatial sub-plans for particularly busy areas to determine whether sectors would find such greater spatial guidance helpful.”</p>	SNH	<p>Comments Noted see response above.</p> <p>Proposal 23: Develop an Integrated Mariculture Strategy will predominately be a spatial document with zones indicating areas where potential fish and shell fish farming can take place. Agree that sub-plans would be beneficial. It was found when developing the plan that the large scale provided</p>

Page	Comments/Concerns	Origin	Response
	<p>“welcome the development of the [Plan] and recognise that the work so far is an important step towards improved management in the Firth of Clyde...recognise that the [Plan’s] development has been a complicated process which has been limited by the duration of the project and a lack of available information. However, we would like to have seen some of the current policies/proposals having been undertaken as part of the development of the plan to provide a greater spatial element to the plan and more detailed locational guidance for future development. Specifically we would like to have seen:</p> <ul style="list-style-type: none"> <li>• planning at a level that the future proposed Regional Marine Plans would...looking to identify suitable areas to promote development.</li> <li>• sectoral plans providing a strategic vision for renewable energy, aquaculture, tourism i.e. where these uses can be sustainably located”.</li> </ul> <p>“The Firth of Clyde is a coherent biogeographic area that could be identified as a future Scottish Marine Region. [The Plan] is therefore identified as a possible example of how a regional marine plan could be set out. Regional marine plans are expected to inform developers on where they are likely to be able to carry out activities or where conditions or restrictions may be placed on what they do. The Council considers that the [Plan] does not provide this level of guidance and is therefore not suitable as a regional marine plan in its current state.”</p> <p>“Plan states (para. 42, p. 20) that key to implementing an ecosystem based approach...is identifying “what is where” so that suitable areas can be identified for economic development, conservation or protection or a combination. The Review of Biodiversity for Marine Spatial Planning...and the...Seabed Habitat Map go some way to identifying where different habitats and species have been recorded or are predicted to occur [but what the Plan] has not done yet is identify suitable areas for development, conservation or protection. This is an area where the...further development of [the] plan could focus, by looking at the sensitivity of habitats and species. The plan has also not gathered detailed information on the location of activities and other interests to identify these areas.”</p> <p>“[contains] too many policies, some of which are actually proposals or actions ...could be slimmed down by reducing the number of policies and repetition of what is already said in existing local authority development plans.”</p> <p>“policies [within the marine plan having implications that extend above Mean</p>	Argyll and Bute Council	<p>difficulties when trying to provide a more detailed spatial dimension.</p> <p>This limitation of the Plan is fully acknowledged and arises from the (deliberate) decision taken early on, in the context of SSMEI seeking to test different approaches to Plan development, to focus on establishing strategic policy directions for the Firth as a first step towards the development of a spatial Plan. Resource constraints did not permit further progress towards development of the spatial aspect within the original project timeframe.</p> <p>A number of proposals are included in the action plan to capture information on activities within the Firth such as Proposal 5 <b>Map areas where marine based activities take place</b>. Other proposals consider how suitable areas can be identified for development, such as Proposal 15 <b>Develop a coordinated strategy for shoreside infrastructure improvements and maintenance</b>.</p> <p>Overlap between complementary Plans is seen as desirable; this aspect will be explored further during the trial implementation phase</p>

Page	Comments/Concerns	Origin	Response
	High Water Springs] will require integration with terrestrial development plans and cooperation with planning authorities. There is general synergy between the marine plan and our Development Plan, [but] a small number of policies do not align with those in our Development Plan.”		The project team will work with Argyll and Bute council to where possible align policies within the Plan with the Development plan.
	“the document is a good scene setter and provides useful background information on which a marine spatial plan could be based ...work done by sectoral groups will be useful going forward as it articulates the aspirations of each sector and highlights the potential conflicts between activities...[but the document falls] a long way short of being a marine spatial plan. There is no spatial planning element...and no attempt has been made to bring the differing strands together to form a single coherent strategy...”	Crown Estate	See comments above re spatial aspect. The sectoral interactions work and SEA, and summary presentation of these within the sectoral chapters in the Plan, together with development of overarching Objectives, Guiding Principles and Cross-cutting Policies were intended to assist delivery of an integrated Plan. However, the remit to develop and then integrate Sectoral Plans was fundamentally challenging.
	“a welcome and overdue strategy for the Clyde area with an admiral vision for the next 20 years and thereafter”.	Jim Henderson	Comments Noted
	“The Draft Marine Spatial Plan for the Firth of Clyde is quite objective and contains no particular threat to any of our activities.”	RYA Scotland	Comments Noted
	“broadly welcome the plan as a step in the right direction but am disappointed that there seems to be a lack of emphasis on the conservation of the resource itself i.e. the sea...all parties rely on health of the environment and without a stronger emphasis on protection and conservation [of high value landscapes and habitats] the entire project is fundamentally flawed.”	Malcolm Whitmore	The Plan contains 11 policies and 11 proposals with respect to the Environment, more than for any other aspect to the Plan.
	“urge that use of the Clyde area for education [particularly for marine and environmental sciences] is included as a key element in the [plan] as this capacity is strongly linked to infra-structure, such as the Millport [Marine Station]” “Datasets and research undertaken at Millport are likely to be key to delivering several aspects of the plan such as the assessment of fishing impacts and extended surveys of marine habitats. In addition there are major HIE establishments in Glasgow and the surrounding areas which deliver marine science courses.”	SAMS	Project team recognised potential importance of data sets held by Millport and those, which were in a compatible format, were included in the Review of Biodiversity.
	“The Film “The Bay”...should be included in teaching programmes throughout the UK...I know that education is at the forefront of your organisation to ensure youngsters have ecological understanding built into their infrastructure for their future survival”	Jenny Meade	SSMEI Clyde Pilot does not have authority to advise on schools curriculum or teaching materials, but does aim to encourage development of initiatives to raise awareness of the marine environment in Clyde communities.
	“The near disastrous ecological condition of the Clyde waters must be recognised. At present the Plan appears to regard the current state of marine health as a tenable baseline from which to work, and accepts that it can be preserved as satisfactory...Those of us who have known the area for many	Isle of Arran Community Council	Changes in fish stocks are recognised in the baseline <i>State of the Environment Report</i> . At Scottish level, Marine Scotland is working on development of Marine Ecosystem

Page	Comments/Concerns	Origin	Response
	<p>years have a longer historical perspective, and can set the present dearth of fish against a time, less than 50 years ago, when marine life abounded.”</p>		<p>Objectives which will inform future statutory planning</p>
	<p>“appreciate the amount of work that went into producing the draft documents [but] we feel without major surgery we would not welcome it as a Clyde Marine Spatial Plan with the possibility of it being used after the Marine Bill in more than a voluntary way”.</p> <p>“throughout (draft Plan and State of the Environment Report] the true state of the marine environment has been glossed over and the dire state of the resource has not been acknowledged. We feel that there is a complete lack of ambition throughout the whole document to reverse the devastating decline in both fish stocks and the marine environment over the past 30 years”</p> <p>“[draft Plan] repeatedly states there is either not enough scientific evidence or none at all and therefore we need to commission more research before changing the fishing and aquaculture industries unsustainable ways. This is the usual response from organisations keen to continue with the status quo. If this was the case, why did ICES scientist recommend to the European commission a total ban on mobile prawn trawling last December?”</p> <p>“feels that the language throughout both documents has been altered due to the main constituents of the SSMEI steering group. [e.g.] constant use of “Voluntary” in reference to anything needed to be done by the mobile fishing industry.”</p> <p>“overriding comment is that there was a complete lack of consultation with important stakeholders in the Clyde, namely coastal communities.”</p>	<p>COAST</p>	<p>The Plan has always been developed under a voluntary remit. It is recognised on page 25 that the plan would be reviewed and revised after the Marine Bill enters into force and again after the National Marine Plan is developed.</p> <p>The scope of the SSMEI Pilot projects excluded (local) management of (inshore) fish stocks, which falls to Inshore Fisheries Groups (IFG) which are charged with production of Management Plans. Changes in fish stocks are recognised in the baseline <i>State of the Clyde</i> Report. . The Plan has been produced through a consensual approach bringing together diverse organisations. The lessons learned from the experience of this pilot will be invaluable to those developing future statutory marine plans.</p> <p>As detailed in the Review of Biodiversity report, commissioned as part of the evidence gathering process, there are very substantial data gaps across the Firth of Clyde. Many of the Plan policies and proposals focus on addressing critical data gaps to assist future planning in the Clyde and to ensure that policies are evidence based. Specific concerns raised by COAST concerning the use of SeaSearch data are addressed in Appendix 3</p> <p>The Plan is voluntary and has no statutory basis, therefore all it can recommend are voluntary measures.</p> <p>The SSMEI Clyde Pilot steering group is made up of 29 different organisations. The steering group met on 12 occasions over 3</p>

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			years to discuss the development of the plan. The draft Plan was put to public consultation from the 31st of March to the 26th of June. During this period 9 public events were held through out the Firth of Clyde. Also COAST attended the preliminary conference and workshop in November 2006.
	<p>“it is astonishing....that this so called “Clyde Plan” does not recognise the existence of the Clyde Salmon Fishery District” Mr Graham is campaigning to “get fisheries policies introduced to all Clyde land use plans – and it would help if that linked up with the Marine Spatial Plan and RBMP Clyde Area plan” “Given the Clyde’s background it would be a shame if the MSP failed [explicitly] to support and defend this movement towards the full restoration of salmon and sea trout to the Clyde.”</p> <p>“West Dunbartonshire Council have accepted the Reporter’s recommendations to introduce fisheries policies into the Local Plan” (Relevant section of Reporter’s conclusions attached)</p>	James Graham	It is recognised that the Plan could do more for sea angling and wild fish interests. Policies will be included in the final draft to reflect this.
	“main concern is in recreational angling and only commercial fishing seems to be mentioned...recreational angling [brings direct benefits to locals] through B&B, boat hiring and sale of tackle”	Furnace Community Council	It is recognised that recreational angling should be considered in greater detail within the Plan. Specific policy/ies will developed for the final draft
	<p>“recognises that coastal planning will become increasingly important with the implementation of the Marine Bill for Scotland and is encouraged to see that the coastal area of the Park is already covered by one of the first integrated coastal zone plans”</p> <p>“supports the sustainable development approach outlined in the Marine Spatial Plan as this is consistent with the Park’s goals of achieving sustainable development outlined in the National Park Plan and the Consultative Draft Local Plan. Links are made in both documents to the River Basin Management Plans that cover the Park area”.</p> <p>“encouraged to see references made to the [Consultative Draft Local Plan] in the draft Marine Spatial Plan. The [Consultative Draft Local Plan] contains specific policies for guiding development in the coastal area of the Park, and for protecting the water environment [e.g., Policy ENV 15 Development in the Coastal Marine Area, which] classifies the coastal area of the Park as undeveloped [and which] directs future development to existing settlements and seeks to protect the surrounding landscapes and foreshore from inappropriate development...some development can be accommodated where</p>	Loch Lomond and The Trossachs National Park Authority	<p>Comments Noted</p> <p>Comments Noted</p> <p>Comments Noted</p>

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	<p>this is of an appropriate scale and nature and where it will contribute to achieving the National Park Plan objectives of enhancing the role of the sea loch communities as a marine gateway to the National Park through providing new and improved opportunities for water based recreation and transport.”</p> <p>We note that there are many links between the policies and actions contained in the draft plan and the wide range of National Park plans and activities...We will look to incorporate the draft plan into the broad range of activities across the Park, including planning decision-making. We look forward to continuing to work with the Forum to implement the plan.”</p>		Comments Noted
	“the policies...present no overriding concerns as they tie in well to existing policies in the approved joint structure plan and adopted local plans. [The Plan] also links well into the National Planning Framework (NPF2) aspirations for Ayrshire...Although policies can be rather general in many cases this is more a reflection of a lack of data and the voluntary nature of the plan which aims to satisfy a disparate group of agencies. This will only be resolved once the plan receives statutory force.”	North Ayrshire Council	Comments Noted
	General (with specific reference to page 44 – policy ENV 9 Voluntary approaches to protection) “the [Plan] seriously underplays and underestimates the problem of declining fish and the importance of COAST [who are experts on the subject of marine conditions in the Clyde] to achieving the vision on page 5...COAST should be consulted and represented in all stages...No-Take Zones...need to be developed and consolidated in the Clyde as a matter of urgency”	Nick Gill	The Scottish Marine Bill contains mechanisms for developing MPAs but this was not within the remit of this (voluntary) pilot Plan. The steering group is made up of 29 different bodies which included Scottish Natural Heritage, Scottish Environment protection Agency and Fisheries Research Services (now Marine Scotland Science).
<b>Key, Vision (p.5), Forward (p. 7) and Introduction (p.9)</b>			
	Key to Colour Coding: Sectoral Interactions: “Green ...unclear what ‘potentially synergistic’ actually means; Orange...definition doesn’t make sense”	Crown Estate	Comments Noted – the revised Plan will be amended
5	Supportive of vision	S. Ayrshire Council; RSPB; GCVSDPA	Comments Noted
5	“vision could [perhaps]have been more detailed to clarify the desired future state so that progress towards reaching this could be more easily monitored”	SNH	It was felt that the vision should be short. It is the Plan itself, which provides the detail of the desired future state. This draft Plan is not Spatial at present, but contains detail of the strategic direction, which all the partners wish to deliver.
5	Vision...includes a 'healthy marine and coastal environment, rich in biodiversity and natural resources' but we cannot find a road map as to how the existing state will be regenerated to achieve this”.	SSACN	The Plan acknowledges that there is a lack of data to enable the creation of this “road map”. The environmental policies aim to lay

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			the foundations and a number of the proposals in the action plan will fill gaps in our knowledge to enable the development of this.
5	"Vision is brilliant ... but it can't take 20 years!! That will be too late"	Jenny Meade	Comments Noted
5	"Agree with vision (except it should be 10 not 20 years) but if you don't consult with Communities it is not possible to get a representative vision".	COAST	It is standard to develop a long-term vision of around 20 years in such strategic plans. The action plan contains proposals that should be delivered over the first 5 years and the Plan, including the vision should be reviewed and amended if required, at least every 5 years. The vision was arrived at by consensus within the Steering Group, which includes Local Authority representatives.
5	"Vision...to be applauded. From what I can see your plan will not achieve that".	Kathy Sayer	The plan is the first step towards achieving this vision. The Policies contained within the plan will help deliver this. However, it can only be achieved through the successful implementation of the proposals in the action plan.
5	"The vision claims to include an environment rich in diversity AND natural resources. It is clear that at the present time the Firth of Clyde waters are severely depleted in terms of diversity compared with a situation say only 30 years ago. Natural resources are also severely depleted due to complete lack of resource management practices. Any improvement in diversity can only be achieved by curtailing or otherwise managing commercial fishing and also more fully understanding what factors would most effectively contribute to the rebuilding of that biodiversity".	John Campbell	Extent to which overall biodiversity within the Firth has changed is unclear (in some instances, e.g. fish within the estuary, it has increased in recent decades). However, the abundance of certain species has greatly declined. The Scottish Government has established the Clyde Inshore Fisheries Group (IFG) to develop a realistic FISHERIES management plan. Also within the Marine (Scotland) Bill there are mechanisms for the creation of Marine Protected Areas.
7	" A more honest description of what is going on is that the whole exercise is being driven by the Marine Strategy Framework Directive adopted by the EU in June 2008 [which] must be transposed into Scottish law by July 2010...in order to deliver "Good Environmental Status" of the EU's marine waters by 2020. So the outcome is unlikely to be as voluntary as Glasgow claims. Much will doubtless need to be achieved through detailed regulation and legal requirement...the EU target is to be achieved in just over 10 years, not twenty as this plan acknowledges".	John Campbell	The Scottish Government set up the SSMEI Project in 2002. This project recognised that more could be done to manage Scotland's marine and coastal waters better. The aim of the project was to feed into the debate on how to achieve this.  The Marine Strategy Framework Directive has yet to be transposed into UK law. The UK and Devolved Administrations have

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			<p>agreed to transpose the directive using one set of regulations for the whole of the UK, which will help us ensure a coherent approach to implementation.</p> <p>The Marine (Scotland) Bill will create statutory marine planning in Scotland. However, this Plan is voluntary and has been created as part of a Pilot Project designed to inform the debate on how to manage Scotland's marine and coastal waters particularly in a regional context. This Plan covers a twenty-year period but will be reviewed and revised at a number of key stages, as set out on page 25.</p>
9	<p>Para 3 "incorrect. Complete lack of consultation with important stakeholders"</p> <p>Para. 5 "not based on the aspirations of all stakeholders"</p>	COAST	<p>The key stakeholders consulted are included in Appendix 2 on page 104 of the Plan. It is a difficult balance to consult as widely as possible on a project such as this with limited resources. To ensure that as many people had an opportunity to feed in to the development of the revised Plan a number of public consultation events were held through out the area and over 20,000 information leaflets were distributed within communities throughout the Firth (see section 2.2 in this document). The comments received as a result of this consultation exercise are the subject of this report.</p>
9	<p>Para. 5 "Arran stakeholders not consulted, so there are several mistakes re. Arran throughout the text".</p>	Sally Campbell	<p>We carried out a public consultation on the draft Firth of Clyde Marine Spatial Plan from the 31st of March to the 26th of June. During this period we carried out a specific event in Arran, which was well attended The comments received as a result of this consultation exercise are the subject of this report and will inform revision of the Plan.</p>
9	<p>Para. 5" [Plan is stated to be] a framework based on the ASPIRATIONS of stakeholders and REGULATORS...It should state INTENTION not aspiration, and the REGULATORS must be formed to have a definite statutory responsibility...Either a separate body, or reinvestment plus transparency into</p>	Jenny Meade	<p>As this is a framework rather than a blue print for sustainable development within the Firth of Clyde it is felt that aspirations is more appropriate. The remit of the SSMEI</p>

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	the work of the SFPA”		Clyde Pilot was to develop a Plan within the existing statutory mechanisms. We will pass your comments to Marine Scotland who are currently developing the Marine (Scotland) Bill.
9	“[This draft Plan] provides a basis to start the debate but it cannot claim to provide the confident roadmap to renewal of marine biodiversity...Somehow the front end is missing i.e. what is there now and what are the constraints to achieving the objectives. Then how can these objectives be met through policy initiatives, leadership and management. It is always difficult to start off with a clean slate and be imaginative and creative and the plan has failed in this respect, the authors deciding instead to try and mould the existing situation into a framework of acceptability”	John Campbell	It is agreed that this Plan is starting point. It is a Pilot project and what we are trying to do is learn lessons that will help those responsible for delivering statutory marine plans in the future. As with those delivering future Marine Plans we were required to work within whatever statutory measures are in place. The remit of the SSMEI Clyde Pilot was therefore to develop a Plan within the existing statutory mechanisms.
9	“Paras 6 & 7 should make clear the relationship of this voluntary Plan to forthcoming [statutory] Regional Marine Plans”	RSPB	Comments Noted
<b>Defining Features (p. 10-13)</b>			
11	Paras 13 & 14 , (Water Environment Features) “confusing...should include update based on most recent classification results [from] Clyde AMP” [and] should [refer to] significant impacts on morphology...of dredging, land reclamation and trawling”	RSPB	Comments Noted
11	Para 14, “salmon incl. Sea trout never left the Clyde – they still ran the River Leven/Lomond sub-catchment. They became extinct upstream of Dumbarton Rock only”	James Graham	This text refers to Inner Clyde and was not intended to imply that salmon had disappeared from the entire area.
11	Para 15 “Prawns are the only commercial species left as whitefish stock has completely collapsed.”	COAST	This was recognised within the baseline State of the Environment report
11	Para 18 “seems to underplay variety of cetaceans...and [does not mention] seals”	RSPB	The variety of cetaceans will be added to on guidance with RSPB and SNH. A reference to seals will also be included.
12	Para 24 suggest that a long-distance coastal path could make the Clyde a popular tourist destination. Refers to Rotary Club of Ayr’s “Ayrshire Coastal Path Official Guidebook” but notes that this is only a designated route and is not suited to many users, including cyclists and dog walkers	East Esplanade Protection Group	Comments Noted – the revised Plan will consider community aspirations with respect to enhanced coastal access
11 - 12	Paras 15-24, “While the coastal marine area of the National Park is not designated as a marine protected area, the [LLT]NPA has development planning responsibilities which extend to the marine environment...[and] would support reference being made to the National Park in the introduction section due to its importance for natural heritage values, as well as the Cross Cutting Themes: Environment section on page 38. “	Loch Lomond and The Trossachs National Park Authority	Comments Noted

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<b>Context (p. 15-17)</b>			
15	Paras. 30-31 (Marine Spatial Planning) should “include reference to protecting and enhancing the most important environmental assets”	RSPB	Comments Noted – will be added
15	Paras.32-34 (ICZM) “a duty should be placed on SMR to adopt the eight principles defining integrated coastal zone management as they provide a good link to RBM”	Scottish Water	Comments Noted – Your comments will be passed to Marine Scotland
17	Paras 35-36 (Ecosystem Approach) “these issues should be set in the context of the overall sustainable development of Scotland, safeguards must be proportionate, underpinned by scientific assessment and must take socio-economic aspects into account at the policy development stage”	Scottish Water	Comments Noted – the Pilot team are currently working with Strathclyde University on a preliminary exploration of how the Ecosystem Approach might be applied to Marine Planning in Scotland and SNH recognise the need for the development of guidance in this area (see below).
17	Paras 35-36 (Ecosystem Approach) “The adoption of an ecosystem approach to the Plan is one that we strongly support...However, we recognise that it has proved difficult in translating the high level principles into specific policies and proposals. We recognise that it would be helpful to develop some practical guidance to assist future marine planners with this”.	SNH	Comments Noted – The SSMEI will work with SNH to develop practical guidance to assist future marine planners.
17	Paras 35-36 (Ecosystem Approach) “Resource depletion and environmental destruction are clearly not options [under the definition of ecosystem approach to sustainable development given on p.17] and reversing the changes for the worst of recent years past will mean constraining man’s influences as well as integrating and managing the range of demands”  “The first question to ask is what baseline is to be adopted, the present depleted condition or the historically more diverse environment and richness of resources...Integrating and managing the existing situation is unlikely to deliver improvement [in line with Scottish Government’s 5 <sup>th</sup> strategic initiative on p. 28]”.	John Campbell	At Scottish level, Marine Scotland is working on development of Marine Ecosystem Objectives which will inform future (statutory) Planning
17	Paras 35-36 (Ecosystem Approach) “SSMEI struggles to understand the meaning of an ecosystem approach...have to acknowledge the real current state of the seas...there has to be agreement on working towards rebuilding an ecosystem baseline of at least 20 – 30 years ago and that is not going to happen voluntarily. Only strong government willingness to confront the issues will improve Scotland’s natural marine environment and the sustainable use and enjoyment of it for generations to come. Integrating and managing the existing situation is unlikely to deliver any improvement in the Clyde”.	COAST	The SSMEI Clyde Pilot was tasked with developing a voluntary Marine Spatial Plan. It is recognised that statutory marine planning will be delivered through the Marine (Scotland) Bill. This Bill also contains measures to protect the marine environment.
17	Para. 37 (Climate Change) “focus should be changed...to role of the Plan in contributing to climate change mitigation and adaptation”	RSPB	Comments Noted - A paragraph will be added to outline this.
17	Para. 37 (Climate Change) “Rise in sea levels will also increase the rate of coastal erosion” which “potentially threatens some coastal villages ...dune structures...link golf courses and ...could make some of the A77 south of	S. Ayrshire Council	Comments Noted – A reference to this will be included

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	Girvan impassable”		
17	Para. 37 (Climate Change) “ Plan does not set out any guidance or possible actions...which will help to mitigate climate change, such as support for well sited renewable energy, locational guidance for development which avoids locations which may be subject to coastal inundation, guidance on coastal defences or shoreline management”.	SNH	As more spatial elements of the Plan are developed in future, climate change mitigation and adaptation measures will be considered.
17	Table 1 (Climate Change) Coastal squeeze and coastal flooding impacts may occur independently and should be separated; “coastal squeeze...may be caused by presence of...flood defences”  Effects of increasing sea temperature better described as “Changes in abundance and distribution of marine species”	RSPB	Comments Noted  It was felt that the specific issues of increasing sea temperatures should be explicitly described.
<b>Developing the Plan (p. 19-23)</b>			
19	Para. 39 (Steering Group) “FoCF has learnt nothing if it leaves out important stakeholders.”	COAST	The Firth of Clyde Forum Core Group (FoCFCG) has provided the stakeholder-regulator partnership and acted as the SSMEI Clyde pilot steering group through the development of the draft Plan. The FoCFCG contains within its membership representatives of almost all the bodies currently involved in planning within the Plan area. The 29 bodies that make up the membership of the steering group can be found on page 104 of the Plan.  To ensure that as many stakeholders were included in the process as possible the project team undertook a 12 week public consultation process, which included carrying out 9 consultation events across the Firth (see section 3. of this report).
20 - 22	(Evidence Gathering) “the [reports on Landscape/Seascape Assessment, Review of Biodiversity and Seabed Habitat Map] in conjunction with advice from SNH and additional studies, could further develop the [Plan] in order to provide more detailed spatial guidance for activities and development in relation to environmental sensitivities”.	Argyll and Bute Council	Comments Noted – it is certainly the intention that future plans would be much more spatial in nature. The policies and proposals relating to Mariculture explain how we would envisage such an approach being developed for this sector.
20	para 43 (Sectoral Interactions): “interactions matrix work was a very useful exercise [but] was carried out at a high level and did not generally relate to particular locations where interactions were occurring. The exercise concluded that there was very little conflict in the	SNH	Agree that it would be beneficial to carry out this exercise in a spatial context. The project team would welcome the resources to be made available to enable this to

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	<p>Clyde as a whole, but it would be interesting to test whether a more spatial approach to this exercise would have delivered different results”</p> <p>“We also consider that the results of this work were not very well integrated into the formulation of policies in the Clyde plan. For example, paragraph 166 states that ‘leisure moorings and anchorages can often compete for space with trawl fisheries and mariculture’, but this is not represented spatially and does not seem to be highlighted in any policy proposals”.</p>		<p>happen.</p> <p>The project team have, as much as possible, integrated the work of the sectoral interactions study into the Plan and the development of policies. A summary of this is provided within each sectoral chapter. This table also highlights policies within the Plan that may assist in managing conflicting interactions between sectors, or in further enhancing synergies.</p> <p>Policies within the Plan have been developed that add value and do not duplicate existing mechanisms that are in place. Currently the Clyde Mooring Committee (CMC) has delegated authority from the Scottish Government to administer Section 34 Consent under the Coast Protection Act 1949, which considers the impact of proposed works on navigation, for applications of 6 or fewer moorings within the Clyde Harbour Authority Area.</p>
20	para 43 (Sectoral Interactions): “[should make clear] that term ‘managed conflict’ only implies that a management system exists, not that it is being used well to protect environmental assets”	RSPB	Comments Noted –the Sectoral Interactions summary tables at the beginning of each of the sectoral chapters includes this, however it has not been made explicit in this paragraph, which will be rectified in the revised Plan.
20	para 43 (Sectoral Interactions): “any statutory framework must take into account and balance the legitimate needs of all users of the marine environment including the water industry requirement to discharge treated effluent. Scottish Water’s coastal (shoreline) and marine infrastructure assets are static and must remain operational 24hrs a day.” “in the interaction tables...few interactions are deemed incompatible” “.Once a [Waste Water Treatment Works / collecting system] has been built to meet regulatory standards it should not be possible for an incompatible activity, such as a shellfish farm, to be developed in the mixing zone unless the appropriate mechanism has been used to secure any funding necessary to provide the appropriate level of treatment to ensure good water quality”	Scottish Water	Comments Noted
20	para 43 (Sectoral Interactions): “very useful piece of work...the plan could be	Argyll and Bute	Comments Noted – see comment above.

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	further improved through gathering spatial data on where these activities are occurring to identify spatial hotspots where conflict is likely to occur and needs managed, where there are incompatibilities and where there are opportunities (potential positive interactions)...one of the key findings...was that there were substantially fewer unmanaged conflicts or incompatibilities within and among sectors than might be anticipated. [We] consider that it is important that future marine planning recognises the need to be careful about developing policy based on potential conflicts and impacts, which are often based on the worst case scenario rather than the real impact of activities and developments”.	Council	
20	Para. 44 (State of the Clyde Report) “contains a lot of interesting information...sections of interest to COAST are mainly taken from the Clyde Environment and Fisheries review. Mistakes like: “Carradale fishermen are said to fish round the Arran coast, including in Lamlash Bay, for razor fish.” are perpetuated...The only graph showing fish numbers on page 60 Figure 37 shows the cumulative number of species recorded in the Clyde Estuary since 1979 shows a continuous upward trend, no doubt true, but very misleading.” COAST would like to see graphs from DAFS/SFPA showing landings of various whitefish species within the Firth of Clyde between 1960 and 2005 included...”when you add ICES scientific data of no return of pelagic fish stocks due to bycatch of prawn trawling, that will bring it very much more up to date. In December 2008 it is still ZERO”.	COAST	The SSMEI Clyde Pilot used the most up-to-date and appropriate information that was available. The Clyde Fisheries Development Project (CFDP) produced the Clyde Environment and Fisheries Report in 2008 and this is the basis for much of the information in that section of the State of the Clyde Report, as there was seen as no point in replicating this effort. It should be noted that The University Lab Millport, WWF, SNH and the Clyde Fishing Industry were all partners on the CFDP.
20	Para.45, (Socioeconomic Review) “the socio-economic report does not fully reference any of the data it contains and so any peer review of the evidence on which its bases its assumptions is not possible ...as [it] is a fundamental building block for the Plan, this is a weakness”	Crown Estate	This is an oversight and a full list of references will be provided as an appendix on our website.
20	Diagram 6, “the year of the data that has been used to estimate the number of jobs, businesses and turnover needs to be defined [here and in the socio-economic information presented in each sectoral plan] ...would also be useful to have provided a short analysis of trends for each sector [which] ...should then influence the plans policies”.	Argyll and Bute Council	Comments Noted – these will be added
20	Diagram 6, question accuracy of (high) numbers of people shown as being employed by the fishing industry  “likely that these numbers include businesses in the region that process and distribute fish and fish products imported from [outwith the Firth of Clyde]”	Sally Campbell, Jim Henderson  John Campbell	This data was taken from the National Statistics Annual Business Inquiry (ABI) 2005. Further information on the ABI can be found on the National Statistics Website. <a href="http://www.statistics.gov.uk/abi/">www.statistics.gov.uk/abi/</a>
21	Para. 46 (Review of Biodiversity) “mapped the distribution of records of priority species, priority biotopes and hotspots in restricted areas of the Firth of Clyde, but this is not illustrated in the [Plan]. The inclusion of this information and an assessment of the sensitivity of key species, habitats and identified hotspots to anthropogenic or environmental factors are considered to be a priority in the next stages of development of this plan or...of a regional marine plan under the Scottish Marine Bill. [We note] the significant gaps in data...identified by this	Argyll and Bute Council	Comments Noted – This information is available in the Review of Biodiversity Report, which is available on the project website.  The data from the project are archived in several datasets, as they were received from

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	report and support the need ...to identify requirements for future surveys and studies. Despite the data gaps this report has gathered all existing data...[and we] would like to see this made available to relevant regulators and for other plans and projects in the Firth of Clyde...There may be potential to use [this existing information] and produce sensitivity maps that could identify areas of high or low sensitivity to particular activities/ types of development. This could provide guidance on whether additional management or restrictions are necessary and what areas would be preferred for development.”		the original data providers. In accordance with the DASSH Terms and Conditions, the original data providers would need to give permission for the data to be used for a purpose other than that for which is was originally collated (the Firth of Clyde project).
22	Para. 48 (Seabed Habitat Map) should [explicitly state] that this model does not reflect habitat quality or value or include data on any changes to habitat as a result of human activities”	RSPB	Comments Noted – this will be added so as not to cause undue confusion.
23	Para. 51 (Public Consultation) “does not state what mechanisms were utilised to engage the wider public” “was it area biased” “appendix document how the public events were advertised and how many people attended [would be beneficial]”	South Ayrshire Council	Please refer to Section 3 of this report
<b>Changing Policy Environment (p. 25) and Policy Context (p.27-32)</b>			
25	Paras. 55 & 56 “UK and Scottish Marine Bill proposals should be compatible and compliment each other”	Scottish Water	Comments Noted - Your comments will be passed to Marine Scotland.
27	Para 62 (National Planning Framework) “NPF2 strategy runs to 2030”	RSPB	Comments Noted – This will be amended
27	“Arran Local Plan not taken into consideration regarding Lamlash Bay.”	COAST	Comments Noted - The Arran Local plan will be included in Diagram 10.
28	Para 64 (Scottish Government Strategic Objectives) note that creation of paths such as between Langbank and Port Glasgow “may make pedestrian access to health easier” and “natural and built environments are better appreciated [by routes] linking up and down to the coast”	East Esplanade Protection Group	Comments Noted – the revised Plan will consider community aspirations with respect to enhanced coastal access
30	Para. 65 (Relationships with other Plans) “agree that such a plan should [ ‘ provide a means of better informing public bodies who have responsibilities for marine and coastal planning functions and will inform decision making, guide priorities and seeks to achieve a balance between national and local interests’] but feel that the current draft does not meet all of [these aims]”.	Argyll and Bute Council	Comments Noted – the project team have aimed to deliver as much as possible towards this, within the existing resource constraints.
30-32	(Relationships with other Plans) “...need for integration of planning for land based activities and activities either in or impacting the marine environment. Marine Spatial Planning should pay equal attention to both offshore and onshore activities; in particular with regard to planning and development matters and integration with terrestrial based plans, especially the RBMP.”	Scottish Water	This Plan and those proposed by the Marine (Scotland) Bill extend to the Mean High Water mark, while terrestrial plans extend to the Mean Low Water of Spring Tides. This overlap should encourage increased integration of marine and terrestrial planning.
30-32	(Relationships with other Plans) “We find the planning element to be the most confusing...Scottish Marine Bill proposes to introduce Scottish Marine Regions (SMR) and implement marine planning through a partnership comprising local stakeholders or a public authority. In order to avoid confusion and overlap there needs to be a better definition of the proposed relationships between the SMRs	SSACN	Comments Noted – Your comments will be passed to Marine Scotland.

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	/ SSMEI and the many bodies / functions involved in the marine environment – Integrated Coastal Zone Management (ICZM), Inshore Fisheries Groups (IFGs), The Crown Estate, SNH, Local, Regional and National governments etc., and where the legislative responsibilities lie...the boundaries between many of them are totally different and overlapping is common, e.g. the boundaries of the Clyde SSMEI and IFGs are different.		
31	Para 70-71 (Regional Transport Strategies) “Local Transport Strategies are also important for improving marine-based transport and should be mentioned in this section”.	LLTNPA	Comments Noted – This will be included in the revised Plan
31	Para. 76, (RBMP) “No indication on how links [between marine Spatial Planning and RBMP] could be achieved” “there will need to be a clear understanding about relative roles and responsibilities .....and clarity [on] who and by when, any identified measures are to be delivered”.	GCVSDPA	Comments Noted – this will be made more explicit in the revised Plan.
31	Paras. 72-76, (RBMP) “Scottish Marine Regions...should fit geographically with the River Basin Management Plan (RBMP) areas; [and] integration with Water Framework Directive (WFD) objectives is imperative and of particular significance if the Marine Strategy Framework Directive objectives are to be met...”  Para. 74 “RBMP will set out environmental objectives only for those water bodies that are included in SEPA characterisation report.”	Scottish Water	Comments Noted - Your comments will be passed to Marine Scotland.
31	Paras. 72-76, (RBMP) “The emergence of River Basin Management Planning into statute and the implications for the improvement of water quality in the Firth of Clyde implied by this work is not fully addressed and could lead to further confusion”.	North Ayrshire Council	It has been recognised that the relationship between the River Basin Management Plan (RBMP) and the Plan are not explicitly described well enough. This will be added to in the revised plan.
32	Clyde Inshore Fisheries Group “It is important to stress that at this point in time Marine Spatial Plans are not the mechanism by which various issues in fishing industry can be resolved. However Marine Spatial Plans are of most use in defining and addressing interactions between the spatial elements of fishing and other activities.”  “further [necessary] clarification of] the nature and mechanics of the relationship between IFGs and the proposed Marine Planning Partnerships in the Marine Bill...needs some discussion in the appropriate fora, including SIFAG and/or Scottish Fisheries Council and ultimately some strategic guidance [from] Marine Scotland to...Marine Planning Partnerships and IFGs. It is our view that this should not be left to develop ad hoc”.	SNH	Comments Noted  Comments Noted - Your comments will be passed to Marine Scotland.
32	Clyde Inshore Fisheries Group “Unlikely. [We] view the recently established IFG as being illegally set up, as fishermen are left to manage a common resource”	COAST	Comments Noted - Your comments will be passed to Marine Scotland.

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32	“problem here of putting the cart before the horse. For a start it is not clear what plan is being described in the text as illustrated in Section 78, page 32. ...if the marine spatial plan objectives are to be achieved then the advisory and regulatory implementation structure described in outline on page 95 needs to provide oversight in regard to the IFG status and not the other way around.....One would therefore eventually see the IFG chair perhaps representing fisher’s interests in a broader approach to ecosystem management rather than having two independent advisory groups in competition, a recipe for all too familiar failure where commercial fishing drives the agenda”.	John Campbell	Comments Noted - Your comments will be passed to Marine Scotland.
32	“IFGs do not include all those stakeholders. The government is obliged by law to protect the fishing commons, on behalf of us all, including community stakeholders, just not (sic) fishermen. Not democratic, maybe even illegal, in present terms”.	Sally Campbell	Comments Noted - Your comments will be passed to Marine Scotland.
<b>Framework (p. 33-35)</b>			
33 - 35	“In agreement with [our] vision and aims”	S. Ayrshire Council	Comments Noted
	“supports vision, high level aims, objectives and guiding principles”	GCVSDPA	Comments Noted
33-35	“The Plan appears to focus on sustainability and not consider regeneration. Lack of recognition of the true state of fish stocks in drawing up the 'State of the Clyde' – fig 38 implies a continual growth in the number of species in the Clyde...it does not take account of those that have been lost. This is seen by many as a deliberate attempt to hide the true situation.”	SSACN	Figure 38 is a true reflection of the increase in the biodiversity of fish found in the Clyde Estuary. Other sections of the baseline report document the decline commercial whitefish stocks
33	para 80 reference to defining features should be removed as...includes historical aspects of the Clyde that are not necessarily desirable to safeguard”  Text box: Suggested amended descriptions for framework elements Vision: “sets out how the Clyde should look in 20 years time following Plan implementation” Aims: “describe the overarching purpose of the Plan” Objectives: “specify particular changes that the Plan will deliver or contribute to delivering” Guiding Principles: “set out the policy approaches that have shaped the Plan”	RSPB	Comments Noted  Suggested change to definition of ‘Vision’ will be adopted; remaining definitions will be retained.
33-35	“broadly supports the framework...which comprises the vision, aims, objectives and guiding principals”  Economic Aim (para. 85, p. 34) “could be expressed more positively and refer to <i>future</i> as well as current economic activity and opportunities for growth”  Social Aim (para. 86, p. 34) similarly, “maintain and <i>improve</i> the wellbeing”	West Dunbartonshire Council	Comments Noted
34	Sustainable Development “The statements on this page finally nail the	John Campbell	Comments Noted

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	definition as it applies to this draft plan...There is of course an immediate and predictable problem illustrated by the incompatibility of the high level aims...Whereas under environmental the aim is to maintain AND enhance the biodiversity, under economic, the aim is to support current economic activity. In the case of mobile fishing in the Clyde the current commercial activity can in no way produce results that enhance biodiversity, quite the contrary”		
34-	O1 “should specify a spatial aspect...so that [future revisions of the Plan] will specify where activities are proposed and where policies apply”	RSPB	Comments Noted: following discussion by Steering Group, Objective 1 will be amended to read “develop an integrated suite of policies .....within the Forth of Clyde, including spatial elements”
34	O2 change “will ensure” to “will allow”	RSPB	Comments Noted
34	O3 “unclear how this will be delivered...as provision of [this]infrastructure will be subject to terrestrial planning process” Concerned that such developments be supported above other types “when no evidence of need or demand is presented”	RSPB	This is Scottish Government Policy and as such should be transposed into a Marine Plan for the Firth of Clyde. As indicated this has direct linkages with terrestrial planning and as such through the planning process evidence of need or demand would be required before planning consent was approved. It should also be noted that in most instances due to the high initial investment required for any new development it would be anticipated that for either private or public funds to be made available evidence of need or demand would be required.
	O3 “welcomes the inclusion of this objective and suggests that it could be strengthened by adding “including leisure boating”.”	LLTNPA	Objective 5 more adequately covers leisure boating.
35	O5 should “also refer to promotion and awareness raising” with “[additional] focus on low impact activities such as coastal walks and wildlife watching”	RSPB	Comments Noted- the revised Plan will consider issues such as community aspirations with respect to enhanced coastal access.
	O5 “ not clear whether [this] relates just to recreational activity”	Argyll and Bute Council	It relates to just recreational activity. This should possibly be made more explicit.
35	O6 “Health and social cohesion would be improved by a long distance coastal path” “[Linkage] of places off road would help the built and heritage aspects to be more readily accessible, so more appreciated and safer from vandals”	East Esplanade Protection Group	Comments Noted – the revised Plan will consider community aspirations with respect to enhanced coastal access
35	O7 “strongly object to wording” the objective should be “better informed decision making” which is seen as delivering “many other benefits [in addition] to improved commercial confidence] including protection of important	RSPB	Comments Noted; however, current wording of Objectives was agreed by the project Steering group, of which RSPB is a member,

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	environmental assets and consideration of community concerns...Also feel that Plan should not have “the pro-development approach described here in all areas”		and will therefore be retained
35	O8 Welcome inclusion but note that “does not give clear statement of what additional changes will happen as a result of the Plan” seek rewording “the Plan will use all available information to identify areas of biodiversity importance to enable them to be adequately protected” and “Plan will develop policies that encourage all decisions to be taken in a way that minimises environmental impact and enhances biodiversity.	RSPB	Comments Noted; however, current wording of Objectives was agreed by the project Steering group, of which RSPB is a member, and will therefore be retained.
35	O8 “Disagree...There is currently sufficient knowledge of important habitats and species to make a start to protect it.”	COAST	The Review of Biodiversity carried out independently by the Marine Biological Association highlights the need for further work to be carried out to provide a data set that can be used in large scale marine planning. Some datasets aren’t suitable for prioritising action at a strategic level across the Firth; however they are important for project level Environment Impact Assessments.
35	O8 “Yes, we need to have an understanding of land and seascape visual impact (LSVIA) importance. However, more often that not nowadays, the LSVIA is given the ultimate importance, and many development proposals are being refused on the basis of an entirely subjective opinion of impact. An LSVIA must be created with balance; due and equal consideration must also be given to socioeconomics, sustainable development, mitigation proposals, etc. Also it must be acknowledged that the oft cited reason for refusing a development based on LSVIA because “the tourists don’t like it” has now been shown, through a recent SARF study, not to be the case at all, and that aquaculture in particular does not negatively influence tourists’ opinion of Scotland’s west coast”.	Lighthouse Caledonia	Comments Noted – A landscape capacity study for mariculture has been proposed and this combined with an integrated mariculture strategy will provide guidance as to the most appropriate places for mariculture development.
35	O8 “critical areas – fragile habitats/ground nesting birds [could] have paths round the edge with notices [about keeping dogs on leads]”.	East Esplanade Protection Group	Comments Noted
35	Guiding principles: “Welcome GP1 & GP2”	RSPB	Comments Noted
<b>General Comments on Policies (p. 37-93)</b>			
	“individual policies have potential to contradict the Plan objectives or conflict with other policies. This could be resolved by inclusion of an overarching sustainability policy” “environmental aim (p.34) should be given primacy...There must be no attempt to achieve trade-offs between short-term financial gains and truly sustainable policies...”	RSPB	This is a sustainable development plan and therefore the environmental aim cannot be given primacy. The Scottish Governments has indicated that it encourages sustainable economic growth and this plan must reflect that.
	“the SSMEI should be rewritten to include a tough watch and examination of	Ian Hunter	The Ministry of Defence is not a devolved

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	the radiation risks posed by [the MoD bases at Faslane and Coulport] on the natural and human environment of the Firth of Clyde. It is my wish that...this marine spatial plan will be one of the reasons why nuclear weapons will be removed from the Clyde within 20 years” (attached Guardian article of 27 April 2009 on nuclear safety breaches in the Firth of Clyde)		matter; also the SSMEI Clyde Pilot has no statutory basis.
43	<p>“many of the policies...are at a very general level and seem to be intended to inform the development of later plans rather than directing planning and licensing decisions in their own right e.g. ENV 6 states that ‘Developments and activities should be in locations appropriate to their scale and impact on the environment...However, as this is the Plan that should be used to determine the locations of such developments, it is our view that the wording should be more proactive, such as ‘Developments and activities will only be permitted in locations...Furthermore this policy should be linked to spatial guidance to identify where such areas might be found”.</p> <p>“ many of the policies are actually proposed actions to fill data gaps or develop sectoral strategies e.g. of the 11 policies in the environment section, 7 are proposals for further work, linked to 11 actions in the action plan...it might be more helpful to separate [actions] clearly from true planning policies.</p>	SNH	<p>Comments Noted This first draft plan is less spatial in nature than originally envisaged by the project team. This reflects both data gaps and resource limitations. As noted, many of the policies and proposals in the draft Plan aim to fill current data gaps and enable future revisions of the Plan to become more spatial.</p> <p>The hierarchy of policies and proposals will be considered when reviewing the Plan.</p>
	<p>“more focus needs to be given to...conserving /regenerating the marine environment [with] SMART objectives to ensure meaningful measurement of [progress].”</p> <p>“too much focus on the needs of the mobile nephrops sector”</p>	SSACN	<p>The Plan contains 11 policies and 11 proposals with respect to the Environment, more than for any other aspect to the Plan.</p> <p>The Plan considers the infrastructure requirements of the Fishing industry, with policies that are not gear of species specific.</p>
	“there is a need to record [culture] and transfer it to new generations through training in traditional craft and trades, how to run a business, story telling, art, music and theatre etc, The plan is missing something when it refers to these matters in the aim but falls short of delivering clearer statements in the policy sections”.	Glasgow City Council	Comments Noted
	“identification of crosscutting policy themes and sectoral policies is an innovative approach to spatial planning which perhaps requires further explanation within the Plan, particularly how it is intended to contribute to enabling the integration of competing demands for access to marine resources.”	West Dunbartonshire Council	The sectoral interaction and SEA summary tables have been used to highlight how the plan contributes to enabling the integration of competing demands, however it would appear that this has not been entirely successful in this and as such this will be reviewed for the revised Plan
	“would...like to see sea bed flourish...no wind turbines [or] tidal capture structures...and fishing in the Estuary restricted to tourist/recreational people”	William Graham	Comments Noted - Your comments will be passed to Marine Scotland as restricting fishing activity is outwith the scope of this plan.

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	"a few 'art groynes' (e.g. whaler, eels, sharks ..... ) may prove interesting for tourist photographers as well as preventing shifting sands"		Comments Noted
<b>Crosscutting Policy Themes (p. 37-54) General Comments</b>			
	"agrees that a strategic approach is what is required and considers that this should be reflected in the proposed Marine Bill National Plan and Regional Plans...would like to draw attention to the significant investment that will be delivered under the current Quality & Standards III Investment Programme, and indeed through Q&S I, and Q&SII...future investment will help deliver the objectives of the Metropolitan Glasgow Strategic Drainage Plan".	Scottish Water	Comments Noted - Your comments will be passed to Marine Scotland.
	Suggest "economy could be a fifth theme in accordance with the aims of the Plan"	West Dunbartonshire Council	This was considered, but in this instance the sectoral plans were considered to provide the economy theme.
	"unclear why there are no policy objectives for the cross-cutting themes, or why the helpful interactions matrix sections are not included for environmental issues. The relevant SEA sections are shown in the sectoral chapters, but these relate to the environmental impacts of the plan policies, rather than summarising the interactions which led to the need for a policy to be developed. This...gives a misleading impression that activities like fishing and mariculture do not interact with biodiversity and landscape.	SNH	Interactions study dealt with perceptions of how sectoral representatives perceived their interactions with others. With respect to natural heritage features, the focus was on how <i>current management</i> of these interests was seen by others. It is the SEA that captures how activities might impact upon environmental features, including biodiversity and landscape/seascape.
<b>Environment (p. 38 – 47)</b>			
	Supportive of policies"	S. Ayrshire Council	Comments Noted
	"would like to have seen some analysis of landscape and seascape in plan, based on existing information such as the SNH Landscape Character Assessment for the Clyde and existing landscape designations".	Argyll and Bute Council	A desk-top study was carried out by a landscape architect and this work was included within the State of the Clyde Report and as a Separate Report from the project website. It is recognised that the area would benefit from increased work carried out on analysing the landscape and it is for this reason that Proposal 8: <b>Carry out a seascape/landscape analysis for the Firth of Clyde</b> , is included.
	"supports policies ENV1-11 aimed at improving the knowledge and management of the natural heritage of the marine environment...ENV 2 and ENV 4...in particular [have] strong links to the National Park Biodiversity Action Plan and actions related to coastal litter management, search survey, and education and awareness. The NPA also administers an anti-litter campaign with communities in the National Park. Policies ENV6-10 relate strongly to the Consultative Draft Local Plan, which...contains a specific policy for	Loch Lomond and The Trossachs National Park Authority	Comments Noted

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	development in the coastal marine area...and specific policies for protecting the natural heritage and landscape features of the National Park".  "encouraged by the range of biodiversity related actions included in the Marine Spatial Plan." (provided list of coastal marine actions within the NP BAP)		
	"[Plan should stress] that all public bodies have a duty to further the conservation of biodiversity, as introduced by the Nature Conservation (Scotland) Act 2004. [Also] it is considered that greater prominence should be given to Natura 2000 sites in particular. In West Dunbartonshire, the Inner Clyde SPA will have a significant influence on future development both on and near-shore."	West Dunbartonshire Council	Comments Noted - 3 Natura sites within Plan area are shown in Diagram 13 and referred to in para 95, p. 38
38	Para. 92 "Fan Mussel?? We doubt this very much"	COAST	Fan mussel <i>Atrina pectinata</i> have been recorded within the Firth of Clyde, see MarLin website: <a href="http://www.marlin.ac.uk/">http://www.marlin.ac.uk/</a>
	"SSMEI could become very well respected for setting precedent to the many Marine Protected [Areas] around the coast of the UK which must follow."	Jenny Meade	The Marine (Scotland) Bill includes measures for the creation of Marine Protected Areas. This is outwith the scope of this pilot project.
38	Para. 93, "conveniently does not say from what point [the increase in basking shark numbers] took place. Certainly not from the 1950s when [basking sharks, whales, porpoises and seals] were numerous in Loch Fyne."	Furnace Community Council	Accurate and reliable quantitative data on basking shark populations in Scottish waters are not available as there are no regular, scientifically supported surveys of basking shark abundance across UK waters. Consequently little is known of basking shark life history, feeding or migration habits. However, in 1987 the Marine Conservation Society (MCS) initiated a reporting scheme for public participation and in 2005 reported the west of Scotland as the new UK hotspot for basking sharks, with particular concentrations in the Firth.
38	Para 94 environmental interpretation aspect could be "built into a future path system" to encourage greater sense of ownership.	East Esplanade Protection Group	Comments Noted
38	Para 95 "misleading as SPAs designated for their bird populations and only Inner Clyde SPA based on intertidal habitats"	RSPB	Comments Noted – will be revised to highlight that SPAs are designated for birds.
39	Diagram 13 ""no reference to this within text...Lamlash CMNR is not a Natural Heritage Designation, it is a voluntary fisheries management tool, and the diagram should show National Scenic Areas"	Crown Estate	Comments Noted – National Scenic Areas will be added to the final diagram. Lamlash Community Marine Nature Reserve though statutorily underpinned through Inshore fisheries legislation and has been designated so as to protect the marine environment, therefore has been included as

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			a natural heritage designation in this instance.
39	Diagram 13 "The National Park boundaries could...be included".	LLTNPA	Comments Noted
40 - 41	fully support ENV1, ENV2, ENV3, ENV4"	RSPB	Comments Noted
40	Importance of policies ENV1-3 for "future development of marine spatial planning and effective management of the marine environment [is recognised]"  An assessment of levels of sensitivity and the identification of appropriate management and compatible uses described in Policy ENV2 would greatly improve the understanding of development potential along the River Clyde but the direct link between this policy and Policies ENV7 & 8 is not made."	West Dunbartonshire Council	Comments Noted  Comments Noted – This work has begun, but further work is required to enable it to be used in a planning context.
40	Para. 97 (re Policy ENV 1) "Improved information and knowledge about the marine environment will always be needed. However this should not be an excuse for inaction. "More research first" is being used now as in the past to continue with the status quo."	COAST	The policies within the Plan must be evidence-based. This evidence must stand up to scrutiny if the Plan is to be used as a material consideration in planning decisions. During the development of the Plan it has been recognised that additional data is required to provide this evidence base to enable the policies to be made more spatial
40	Policy ENV 1 "supportive...if implemented should ...[allow] policies to be developed that can guide development to appropriate locations whilst protecting and safeguarding important habitats and species."  Policy ENV 2 "essential to enable the location of important habitats and species to be mapped and their sensitivity to development and activities assessed".	Argyll and Bute Council	Comments Noted  Comments Noted
41	Policy ENV 4 "support development of indicators similar to those delivered by implementation of WFD"	Scottish Water	Comments Noted
41	Paras. 105-107 (Indicators) "Missing as indicator species is the most obvious species of -white fish, cod, haddock, whiting etc."	COAST	Comments Noted - These will be considered as potential indicators.
42	Policy ENV 5 "support the need to prevent the introduction and spread of invasive non-native species. The Council considers that [current] guidance [such as developed by SNH and the 'Marine Aliens' project] needs to be backed up by legislation...Monitoring...is very important and much more could be done to build confidence in reporting and following guidelines"		Comments Noted - Your comments will be passed to Marine Scotland.
43	Policy ENV 6 "does not really have any added value in the plan as it is something that would be included in any local authority development plan. This policy could be encouraging developers, marine users and regulators to take account of the biodiversity, and sectoral interactions information gathered through the development of this plan. [Recommend that] the following text be added to the end of the last sentence of para. 111 – 'and be consistent with Local Development Plan policy"	Argyll and Bute Council	The proposed amendment to para. 111 is noted and will be included in the revised Plan

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42	<p>Policy ENV5 (Non-native Invasive Species) “supported. WDC along with LLTNP, A&amp;BC, East Dunbartonshire Council, Stirling Invasives Forum and SNH have formed a Non-native Invasive Species Forum as a key action in the Dunbartonshire LBAP”</p> <p>“LBAPS may also tie in with voluntary approaches encouraged by policy ENV9”</p>	West Dunbartonshire Council	Comments Noted
43	ENV6 (Appropriate Location and Scale) concern that coastal development may create barriers to access; developers “might be encouraged to assist with improving [Ayrshire coastal route]	East Esplanade Protection Group	Comments Noted
43	Para. 111 (re. Policy ENV 6) “Skirting around the issue [of destructive scallop dredging & bottom trawling] as usual”.	COAST	This policy relates to new developments not existing activity.
43	<p>Policy ENV 6 (Appropriate location and scale, p. 43) “support [but] wording may be ambiguous. One interpretation is that the policy relates primarily to activities that fall within the conventional sense of ‘development’. However, it is our view that the principles (of EIA and SEA) should apply more broadly to encompass other activities such as fishing, for example an SEA of IFG management plans could be appropriate. In addition, the impact of a development relates not just to its location and scale but also to issues like timing and details such as construction methods, design, etc.”</p> <p>Policies ENV 7 &amp; 8) “relate to existing Natura and SSSI...would also be useful...to consider the protection that will be afforded to the emerging Marine Protection Areas” Para. 113, p. 43 “would be useful to give the names and locations of the two current European sites, the Inner Clyde SPA and Ailsa Craig SPA (and the proposed extension).”</p>	SNH	<p>Comments Noted - Your comments will be passed to Marine Scotland. EIA and SEA are statutorily underpinned. This policy would not require the Clyde IFG Management Plan to undertake an SEA if it is not already required to by the Environmental Assessment (Scotland) Act.</p> <p>These policies and the wording contained within were requested and supplied by SNH. The 3 Natura sites within Plan area are shown in Diagram 13 and referred to in para 95, p. 38. The project team would happily accept SNH’s guidance as to what the revised Plan could do with regard to the emerging Marine Protected Areas.</p>
43	Policy ENV 7 (Natura Sites) “There are no Marine Natura sites in the Clyde. Due to past lobbying from fishing industry! So this section is irrelevant.”	COAST	There are 3 Natura sites within Plan area are shown in Diagram 13 and referred to in para 95, p. 38
43	Policies ENV7 & ENV 8 (Natura Sites and SSSIs, p. 43) “high level policies of the relevant bodies should inform this process to ensure that projects are not held up during the planning and construction phase, thus increasing costs to our customers.”	Scottish Water	Comments Noted
44	<p>Policy ENV9 (Voluntary approaches) “ sits uncomfortably within the Plan...would be better for the environment policies to reflect the three pillar approach used by Scottish Government in Sustainable Seas for All, i.e. species, habitat and wider measures...voluntary approaches are just one aspect of implementation...[and] we would challenge the merit of flagging the voluntary approach so prominently here”.</p> <p>“Lamlash Bay is not appropriate in this section. One of the key issues of the</p>	SNH	<p>Comments Noted: para. 114 will be redrafted to reflect the three-pillar approach</p> <p>Comments Noted: para. 116 will be</p>

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	COAST proposal was that they did not want to employ a voluntary approach, they were specifically seeking a statutory mechanism to protect the bay...the only 'voluntary' aspect to Lamlash Bay is the nature of the partnership through which the implementation is being taken forward"		redrafted in consultation with COAST and CFA
44	<p>"Voluntary approaches have proven not to work with the fishing industry, as a result of the public right to fish which allows fishermen from far afield to fish in areas where there might be a local voluntary agreement"</p> <p>Para 116 "strongly object and take exception to the wording of this section. We insist on it being rewritten with our agreement before the next draft in order to avoid a totally false reflection of the situation".</p>	COAST	<p>Comments Noted</p> <p>Comments Noted: para. will be redrafted in consultation with COAST and CFA</p>
44	Para. 116, p. 44 Lamlash Bay "This is so far from the truth, disguising the continuously disruptive and delaying tactics of the Clyde Fishermen's Association. It took 14 years from early beginnings to getting protection for the maerl beds in a No Take Zone in Lamlash Bay. This section must be rewritten to reflect the struggle COAST experienced. Not a recipe for any further voluntary agreements to protect sensitive ecosystems in the Clyde."	Sally Campbell	See above
44	"debatable whether the Lamlash Bay exclusion can be used as an illustration of a voluntary agreement. It took 10 – 15 years...to persuade or cajole the politicians to legislate at Scottish national level...and one party to the discussions then protested by breaking the law immediately...This illustrates the limitations of seeking resolution voluntarily when competing interests are present even where logic might prevail. Somebody has to cast the deciding vote"	John Campbell	See above
45	<p>Policy ENV10 "should have been undertaken as part of the [Plan] development...areas of regional importance could have been identified...not clear what is meant by enhancing the landscape and how this would be achieved...Recommend that the wording of the policy should include 'All new development will be required to demonstrate that it will not have a significant adverse effect on landscape and seascape character.'</p> <p>Diagram showing ...NSAs and the National Park [would be useful].</p>	Argyll and Bute Council	<p>Unfortunately this was outwith the scope and budget of the SSMEI Clyde Pilot; however a similar project has been undertaken as part of the Sound of Mull SSMEI.</p> <p>The seascape landscape could be enhanced where areas are identified that aren't suitable for development but which however contain existing developments that could potentially be moved or modified to be more sensitive to their surroundings.</p> <p>Comments Noted- National Scenic Areas and National Park Boundary will be added to diagram 13.</p>
45	Policy ENV 10 (Landscape and Seascape) [Reference to] the study commissioned...on the 'strategic overview of landscape and seascape characteristics and issues within the Firth of Clyde [referred to in the SEA	SNH	Comments Noted – The Landscape/Seascape Assessment of the Firth of Clyde is available from the project

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	would] provide useful context [here].” Para. 121. “important [also] to recognise the landscape impacts which could arise from marine developments such as marine renewables or aquaculture, viewed from either land or sea”		website.  The plan recognises that marine developments can have landscape impacts; however as a marine plan it is also trying to highlight that there can be impacts to the seascape from the land
45	Para. 119, (re. Policy ENV 10) “needs to be some justification for the statement made in the second sentence. How, for instance, does landscape improve health?”	Crown Estate	There is increasing research evidence to indicate that physical and mental health is significantly (positively) influenced by views of and/or access to natural environments (see e.g. Davies, P and Deaville, J. (2008) Natural Heritage: a Pathway to Health <a href="http://www.rural-health.ac.uk/pdfs/publications/CCWReport.pdf">http://www.rural-health.ac.uk/pdfs/publications/CCWReport.pdf</a> )
46	Policy ENV 11 (Marine Litter and debris, p. 46) “regular cleaning of our bathing beaches...also removes natural flotsam...which are instrumental in helping to retain sand. Studies and guidelines on this may be worthwhile pursuing”	S. Ayrshire Council	Comments Noted – There are proposals included within the action plan for marine litter. This includes <b>Developing a coordinated marine litter strategy</b> and <b>Establishing a monitoring network for marine litter and debris.</b>
46	Policy ENV 11 (Marine Litter and debris) East Esplanade Protection Group has undertaken weekly litter clearing on Helensburgh’s east coast for 14 years “lot of litter dropped by locals or visitors – much could be done via environmental/dog wardens” Other sources include street litter from storm drains.	East Esplanade Protection Group	Comments Noted
46	Policy ENV11 “supports the...views [of] The Grab Trust, who are an independent environmental organisation aiming to encourage recycling and waste minimisation in Argyll and Bute.”  “GRAB Trust welcomes the development of a co-ordinated marine litter strategy for the Firth of Clyde and would hope to be further consulted and involved in the development of such a strategy. [pleased that the Plan recognises on p46] that existing initiatives such as Fishing for Litter, The Green Blue, The GRAB Trust and the Marine Conservation Society should be supported. Appointment of a Marine Litter Co-ordinator is seen ...as a positive development, [but] are concerned that due to the large area encompassed and the extent of the problems of marine litter the appointment of one person may not be sufficient...it is hoped that there will also be continued support for the work of GRAB in: raising awareness [of impacts and of what people can do to minimise their impacts] and supporting community groups [with respect to] beach cleans...aware that there are some groups that wish to focus on the	Argyll and Bute Council  GRAB Trust	Comments Noted  It is acknowledged that one person will not be able to tackle the full extent of the marine litter problem within the Firth of Clyde. It is seen that their remit would be to develop the coordinated marine litter strategy and bring together the key organisations around the Firth.

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	clean ups and do not wish to be part of surveys [such as Adopt a beach and Beachwatch]...In developing a co-ordinated strategy this will require consideration as it is vital that any monitoring does not discourage groups from getting involved in cleaning [...beaches]."		
46	Policy ENV 11 " Scottish Water promotes the Bag It & Bin It campaign to discourage the disposal of inappropriate items into the sewerage network"	Scottish Water	Comments Noted – a reference will be added within the Plan
46	(ref. Policy ENV 11) "The 'Fishing for Litter' scheme should be expanded upon and mention [made] of Scottish water and Keep Scotland Beautiful work on marine litter"	Crown Estate	Comments Noted
<b>Communities (p. 48-49)</b>			
	"NPA is seeking to take forward the sustainable development of communities in the Park in partnership with other agencies. This includes enhancing the position of Dunoon as a Gateway to the Park"	Loch Lomond and The Trossachs National Park Authority	Comments Noted
	"supports COM1 and COM2. .... COM2 should include a reference to the area's military heritage".		Comments Noted
	"When livelihoods are threatened it is difficult to conceive that the community so threatened is not ready to "re engage with their coastal and maritime heritage and environment"...e.g. through recreation as intimated in policy COM2. Often these communities have limited resources but skills that need to be harnessed otherwise they leave the community to find work elsewhere. The development of renewable energy, expansion of mariculture and shipping/transport within the marine environment are obvious sectors where these skills can be transferred. Over 60% of all seaman world wide are trained at Glasgow Nautical College, Gorbals, Glasgow. Perhaps there should be something about sustainable transport access to training and diversification of skills"	Glasgow City Council	Comments Noted. Recognition of the role of the Clyde in maritime training will be included in the revised Plan.
48	Policy COM1 "cannot be endorsed as currently worded, new developments will be located where the resources enable a profitable business operation. This may not necessarily be to the benefit of the nearest community who may not have the resources required by the business"	Crown Estate	Comments Noted. Concerns over difficulties of universal application will be reflected in some rewording in revised Plan
48	Policy COM1 "needs to make clear what type of development and activity it is referring to as the policy itself is quite general but the supporting text in paragraph 135 is more specific. An alternative policy could be to encourage developments that assist in delivering the aspirations of local communities, which could be viewed more favourably by regulators."	Argyll and Bute Council	Comments Noted and will be used to inform revisions to this section
48	Policy COM2, para. 136"many might feel the Clyde belonged a bit more to them if access was not (mostly) thought of as a single line from the settlement to the water's edge...in too many spots, to reach the next place, requires a return to the main road"	East Esplanade Protection Group	Comments Noted: the revised Plan will consider community aspirations with respect to enhanced coastal access

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48	“policy COM2...[is fine] as an aspiration but it does not meet the standard tests for planning policies and will not be easily interpreted by anyone making decisions on the future management of the Clyde”.	SNH	Comments Noted
48	Policy COM2 “Getting local communities to re-engage is not the problem on Arran. It is getting government and reports like this to engage with local communities and to listen and respond, that seems to be beyond them”.	COAST	<p>It is recognised that the communities on Arran are engaged in the marine environment. However, the littoral strip around the Firth of Clyde has a population, in 2001, of 387,300. Of this the permanent population of Arran account for around 5,000.</p> <p>The draft Firth of Clyde Marine Spatial Plan was out to public consultation from the 31st of March to the 26th of June. During this period a number of events were held around the Firth of Clyde. A specific event took place on Arran, which was well attended by members of COAST, where the project officers listened and took on board all comments on the draft plan.</p> <p>This report is evidence that the project is listening and responding to all stakeholders.</p>
48	Para. 136, (community engagement). “There has been very little evidence of this from government or project teams such as SSMEI to engage with local communities. Arran is just one example”.	Sally Campbell	See above.
<b>Heritage (p. 50-52)</b>			
	“Supportive of policies”	S. Ayrshire Council	Comments Noted
	Diagram 15 (p. 51) only shows one of the two Protected Wrecks mentioned in text and no Scheduled Ancient Monuments		Comments Noted – The second wreck will be added. The Scheduled Ancient Monuments have been obscured by the National Monument Records; this will be rectified for the final diagram.
50	“Mention should be made of the Joint Nautical Archaeology Committee’s Code of Practice for Seabed Development”	Crown Estate	Comments Noted - this will be included in the revised draft.
<b>Sectoral Plans (p.55-93) – General Comments</b>			
	“[problematic] that individual chapters have been sector led. Introductions to sectors should contain a more objective analysis of each industry”	RSPB	Comments Noted. The original project brief for the SSMEI Clyde pilot outlined that sectoral plans should be created.
<b>Recreation and Tourism (p. 56-64)</b>			

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	<p>“Sea angling is...the # 1 coastal recreation activity in Scotland and is of great social and economic importance - according to an economic study performed by SSACN in 2006, sea angling in the Clyde generates somewhere around £25 million/yr in revenue to the area”</p> <p>Attributes decline in sea angling in 1980s to relaxation of rules on trawling in 1984 and refers to findings of 1988 Scottish Tourist Board Clyde Sea Angling Study “In the end very little was done, over 100 sea angling charter and boats for hire went out of business, a substantial number of tackle shops closed, five major festivals and many sea angling competitions and all their attendant revenues, probably in the region of £10 million/yr, were lost to the area, along with a substantial number of jobs”.</p> <p>“Unless the SSMEI takes sea angling more seriously then it will fail to deliver anything for sea angling and show once again that the views and demands of the dominant commercial interests take preference over the socio-economic value delivered by an activity enjoyed by 100,000+ anglers nationally and 25,000+ anglers within a 30 mile drive of the Clyde SSMEI. Many other countries...have now recognised the value of sea angling and have put in place proactive measures to ensure the regeneration of depleted stocks and create the kind of infrastructure modern day anglers and their families require”</p> <p>“...concern that the Proposed Action Plan whilst considering a strategy for sailing which would involve identifying / delivering the infrastructure and facilities required to enhance the sailing experience, does not consider putting in place a similar strategy for the development of sea angling, even though sea angling contributes around £25 million/yr to the Clyde economy”.</p>	SSACN	The Scottish Government’s recent Technical Report Economic Impacts of Sea Angling in Scotland indicates that the Firth of Clyde has the appropriate infrastructure to support the sea angling industry, however the fish stock are currently not present. Policies and associated proposals will be developed for sea angling in the revised Plan.
	<p>“Foresee a decline in yachting and cruising in the Clyde over the coming years [as a consequence of the price of fuel]”</p> <p>“at one time sea angling was of great importance to the Clyde...at today’s prices the revenue...is estimated at £10 million per year...[recent] visit to Airlie B each in Australia...[which has] launching ramps for boats, boat piers for anglers, barbecue/picnic areas, boat trips around the islands...made me realise how much the Clyde has declined over the years”</p>	Tony Wass, A.S.W. Fishing Charters	<p>There may be a decline in the short term, however trends would indicate in the long term a growing industry. This Plan should provide a planning basis to encourage investment in the area.</p> <p>Comments Noted – policies will be developed for sea angling</p>
	General: “disappointed that this chapter...Focuses so heavily on marine leisure. Request that policies are included to give similar levels of support and promotion to wildlife tourism”	RSPB	Comments Noted: the revised Plan will more explicitly consider issues such wildlife tourism and community aspirations with respect to enhanced coastal access. However, the focus on marine leisure relates to the demand for additional infrastructure, which would also be of benefit to wildlife

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			tourism operators.
	"walking could do with a boost!" Note that there are still many barriers to coastal walking	East Esplanade Protection Group	Comments Noted: the revised Plan will consider community aspirations with respect to enhanced coastal access
	"Recreation [and Tourism] is Arran's primary source of income £30M plus per year"	Sally Campbell	Comments Noted
	<p>"[We have] a water space strategy for the River Clyde [which with] a further study by Clyde Waterfront of infrastructure downstream to Dumbarton has established costs and capacity for ferries, taxis and visiting vessels including marinas. There is now sufficient infrastructure in place to operate a tourism service to Clydebank and smaller vessels such as ribs to Dumbarton...this section should take into account [our] aspirations [within City Plan 2] to establish short and long haul services as well as being a city to visit by water...Cruise ships visiting Greenock [could] visit other parts of the Firth, Glasgow included, by boat."</p> <p>"There is also a focus on sailing and cruising but there are equally large numbers of people involved in water related sports or activities which do much to animate the City at the River Festival but are often excluded from other places in the Firth and associated waterways."</p> <p>"The River Clyde and the City in particular is noted for salmon and the return of the salmon. It is the one River in Scotland that is not governed by a fisheries board. Whilst this gives scope for free fishing there is no regulator authority supporting the development of fresh water fish, the course or the opportunities for communities to gain from this free resource. Perhaps more thought should be given to how this resource should be managed for future benefit".</p>	Glasgow City Council	<p>Comments Noted The project team will work with Glasgow City Council to where possible align policies within the Plan with those in the City Pan.</p> <p>Comments Noted – policies relating to freshwater angling for migratory salmoniids will be developed in the revised Plan</p>
	<p>"[welcome] support for development of tourism and recreation related facilities and infrastructure...Consider that final MSP should identify specific development opportunities</p> <p>...The Lomond Canal is a proposed new waterway linking the Firth of Clyde at Dumbarton with Loch Lomond at Balloch [which] would provide flood mitigation, [and also] potentially offer significant opportunities for sailing, cruising and other marine-based tourism activities, enhancing opportunities for tourism and recreation by linking the Firth of Clyde with the Loch Lomond and the Trossachs National Park. A preliminary route...has been identified [and] a Strategic Outline Case for the Canal and wider Strathleven Corridor Initiative was submitted to the Scottish Government in May 2009. Another site in West Dunbartonshire where there is potential for facilitating the growth of marine</p>	West Dunbartonshire Council	<p>Comments Noted – It would be envisaged that Regional Marine Plans will provide spatial guidance for future development. However due to resources constraints the Plan is unable to deliver on this.</p> <p>Comments Noted</p>

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	recreation activities on the Firth of Clyde is Bowling Harbour”		
	“Supportive of policies” “Southern part of [Clyde] significantly different from northern half and perhaps needs to develop different responses to development of its marine based tourism and recreation product”  “One such idea is the development of artificial reefs to facilitate...sea angling”	South Ayrshire Council	Comments Noted: it is intended that future revisions of the Plan should be more spatial in nature and the possible use of smaller planning units is being considered
	supports the increase and upgrading of infrastructure to facilitate recreational use and tourism opportunities...provided that natural heritage and landscape values...are incorporated into any development. For projects undertaken in the National Park the local plan policies...to guide development would apply...In addition to slipways and shore side infrastructure, pontoons and moorings are also important for providing access for leisure sailors and cruisers to other leisure networks”	Loch Lomond and The Trossachs National Park Authority	Comments Noted
56	Para 160 [Clyde is no longer a first class seas angling destination] “because of our exploitation of stocks by commercial fishermen and intense trawling destroying the seabed and immature fish. All Loch Fyne should be protected from commercial fishing – especially by trawling...unless drastic action is taken Loch Fyne will not recover...”	Furnace Community Council	Comments Noted - Your comments will be passed to Marine Scotland.
56	Para 160 “Sea Angling. Just 2 sentences on what used to be, up until 15 years ago, a large and important industry in the Clyde. This is an injustice to sea angling, which provides crucial income to the tourism and recreation sectors.”	COAST	Comments Noted - Policies and associated proposals will be developed for sea angling in the revised Plan
56	Para. 161 “ no mention of the Scottish Sailing Institute at Largs the instrumental organisation for attracting, hosting and facilitating those events mentioned”  Para. 162 “what is the evidence for cruise ships becoming more common and their passengers coming ashore?”	North Ayrshire Council	Comments Noted – reference to this will be included in revised Plan  Figures from Clydeport indicate that approximately 30 cruise vessels call at Greenock Ocean Terminal each year, which equates to over 50,000 passengers. In response to this demand Clydeport have invested £100,000 in a new cruise terminal in Greenock.
56	para 163 “would be useful to recognise that wildlife watching industry .... Not as well developed as elsewhere e.g. Mull....and potential exists [for expansion].	RSPB	Comments Noted: the revised Plan will more explicitly consider issues such wildlife tourism
57	Diagram 17 “needs to insure that all relevant information is included e.g. visitor moorings are missing at Brodick, Lamlash and Whiting Bay...may also be visitor moorings at Ardrossan and Fairlie marinas...Fairlie marina is missing.”  Diagram 17 (p. 57) “Dunure, Maidens and Girvan should be included as moorings”	North Ayrshire Council; COAST (re. Arran moorings)  South Ayrshire Council	Comments Noted - diagrams will be updated in the revised Plan

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58	Interactions with Other Sectors Table: Column Other “Policy R&T4...clearly recognises that diffuse pollution is a major factor affecting water quality. It is therefore inaccurate and unfair to categorise pollution as sewage disposal in the table.”	Scottish Water	Sewage was an issue raised by representatives of several recreation sub-sectors
58	Para. 165, “[re.] jet skiers and/or small power craft, it would be helpful to substantiate the position statement on the level of safety risk etc by for example specifying how many registered incidents have occurred over the last 5 years. Similarly substantiated evidence/examples in respect of comments on the increase in yachts and motor boats raising risk of conflict would be helpful”.	North Ayrshire Council	Concerns about the potential for increased levels of conflict between small power vessel/jet ski users and other craft were highlighted by the sectoral interactions study, which forms part of the technical appendix to the draft Plan
59	Policy Objectives and policy R&T1 (p. 59) “seasonal nature...of activities associated with tourism in Scotland presents a particular challenge...in providing appropriate water and wastewater services to accommodate the fluctuation of demands on resources and local assets throughout the year and also on the requirements for future investment planning”	Scottish Water	Comments Noted
59	Policy R&T1 (p. 59) “request that text in para 170 saying preference will be given to development on areas of ‘developed coast’ [be included in this policy]”	RSPB	The text in paragraph 170 has been kept separate from the policy as smaller developments such as pontoons at niche locations will be developed outwith areas of coastline currently designated as “developed”.
59	Policy R&T1; “paragraph 170...states a preference for developing recreational facilities in ‘developed’ coast [seems inconsistent with] paragraph 171 which refers to promoting developments in ‘isolated coastal communities’. [Further] suggest that this section should take into account the character and sensitivity of the marine environment where coastal infrastructure developments are being proposed, as well as the nature of the coastline”.	SNH	<p>Paragraph 170 refers to “In considering proposals for <b><u>the development of service centres and large tourist hubs</u></b>, preference should be given to developments located on areas of coastline currently designated as “developed”.</p> <p>Paragraph 171 could be written better to highlight that isolated coastal communities would benefit from smaller developments and not service centres or large tourist hubs.</p> <p>Increased reference shall be made that “sensitive to the marine coastline” includes the marine environment.</p>
59	Policy R&T1 para. 170 “recommend that the second sentence be amended to read ‘In considering proposals for the development of service centres and large tourist hubs, preference would be given to developments located on areas of coastline designated as “developed coast” in strategic and local development plans.’ “	Argyll and Bute Council	Comments Noted – see above
60	Policies R&T2, R&T3 “request that these be clarified by stating preference...for	RSPB	Existing infrastructure could be in the wrong

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	maintaining and upgrading existing infrastructure rather than extensions or new developments”		place in terms of its impacts on the marine environment. The audit should be carried out before such a preference is made.
61	Diagram 18 “would like to see Girvan not only as being a staging post but also a key destination...Troon should also be a key destination”  “should be labelled with locations...not clear how the ‘tourism hubs’ were decided and why so many tourist destinations have been missed out”	S. Ayrshire Council  Crown Estate	Comments Noted - This diagram is informed by the Sail Clyde strategy. Your comments will be passed to the Sail Clyde Partnership
60 - 61	Policy R&T 3 “Sail Clyde Partnership and Strategy does not identify the National Park coastal area. Dunoon and the Coastal Villages around Lochs Long and Goil are identified in the National Park Tourism Destination Strategy...would like to see reference to these areas as they are important recreation and tourism hubs...For “Sail to” and “Niche places” identified in the Strategy consideration should be given to sharing good practice and possibly developing guidance on the procurement and funding for small scale pontoon or similar facility that could be applied in various [appropriate] locations”	Loch Lomond and The Trossachs National Park Authority	See above
60-61	Policy R&T 3 “welcome this policy as an important tool to help promote the retention of existing facilities and development of new small scale marine boating facilities in Argyll and Bute. In terms of larger developments, Campbeltown, Rhu, Portavadie, Tarbert, Ardrishaig all have aspirations to improve their marina facilities. The Sail Clyde partnership is now taking the Sail Clyde Strategy a step further, by attempting to identify an achievable action plan which will prioritise where work can be taken forward. It may be appropriate to update page 61 in light of this work and the [Plan] could seek to influence and inform this next stage of proposals by providing information on potential sensitivities and positive interactions. In addition to the locations identified on page 61, Argyll and Bute Council recently allocated £19 million to town centre and waterfront restoration projects. A significant proportion of these funds are allocated to development proposals in Dunoon, Campbeltown, Rothesay and Helensburgh”	Argyll and Bute Council	Comments Noted
62	Policy R&T4 (Water Quality) “Scottish Water commits considerable investment...towards achieving bathing water quality standards; [but] could not support the creation of a recreational water quality standard at this time...the proposed standard of “no ill effect if water is ingested” would be difficult define i.e. it is not based on risk like the standards in the Bathing Water Directive”	Scottish Water	Comments Noted. The difficulties associated with defining the proposed standard are accepted. The 2 <sup>nd</sup> sentence of this policy will be removed
62	Policy R&T 4 “supports the creation of a recreational water quality standard under this Policy”  Policy R&T 5 (Voluntary codes of conduct) “supports the creation of voluntary codes of conduct. Similar advisory codes have been developed for Lochs Earn, Ard and Eck within the NP”	Loch Lomond and The Trossachs National Park Authority	Comments Noted

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62	Policy R&T 5 “suggest that this policy be amended to read ‘Promotion of existing codes should be encouraged. Where there is a need for a specific code of conduct to minimise damaging impacts and conflicts with other marine and coastal users, and no suitable code exists, Firth of Clyde specific voluntary codes of conduct should be developed in partnership with recreation, business and other stakeholders.’	Argyll and Bute Council	This suggestion is accepted and will be incorporated in the revised Plan
63	Policy R&T 6 (Marketing the Firth of Clyde) “supports the development of a marketing strategy [this] should also include the National Park and emphasise its unique national heritage values [and] should also recognise work [already done] e.g. by the Tourism Assets Marketing and Events Working Group which operates as a sub-group of the Destination Dunoon and Cowal Steering Group.”	Loch Lomond and The Trossachs National Park Authority	Comments Noted
63	Policy R&T6 (p. 63) suggests need fresh way of looking at Clyde coast away from “rather tired Doon the water photos” e.g. aerial views  Policy R&T7 commend ranger service coastal walks e.g. at Lunderston Bay “while it is good to encourage brisker sports events, which are probably higher profile, more photogenic or more cash-engendering – walking is still one of the most popular forms of exercise and the Clyde coast is a super place to do it” “could also keep down carbon emissions”	East Esplanade Protection Group	Comments Noted  Comments Noted – the revised Plan will consider community aspirations with respect to enhanced coastal access
64	SEA summary table (p.64) policies ENV8 and ENV9 “would also have a role in mitigating impacts on biodiversity, fauna and flora”	RSPB	Comments Noted
<b>Shipping and Transport (p. 65- 75)</b>			
	Ask that “the desirability of Scotland/UK level analysis of implications for greenhouse gas emissions of...[development] of an international container port at Hunterston [as highlighted in the SEA] be added to the Plan “	RSPB	Comments Noted - your comments will be passed to Marine Scotland as such an inclusion is not appropriate for a Plan at this level.
	“historical withdrawal of port activities to the coast and the decline of transport routes in the Firth have had a serious impact on many of the communities in previous decades. [Given current regulatory systems] a modal shift is very difficult Aside the regulations, if the Port Authority continues to withdraw its services and personnel to the coast and not plan for the continued use of the harbour upstream of Rothesay Dock, navigation will become difficult through lack of maintenance and management...The Transport Authority wish a modal shift in transport particularly in remote areas to shipping but invariably do not wish to subsidise this shift. If freight and passenger services were <b>jointly</b> considered there may be more opportunity for river based transport. The financial mechanisms for supporting an integrated and subsidised system are also difficult because of deregulation”.	Glasgow City Council	The revised Plan will more explicitly recognise that ferries carry both passengers and freight and the desirability of integration of freight and passenger services.
67	Diagram 19, Glasgow airport missing...[not all] ports and harbours labelled”	Crown Estate	Comments Noted – Glasgow Airport will be added to the final diagram. None of the

Page	Comments/Concerns	Origin	Response
			ports were labelled, however the base map contains labels for key towns, which coincides with some ports. It will be considered by the steering group whether all ports should be labelled.
67	Diagram 19. “[does not show] the oldest ferry crossing in Europe between Yoker and Renfrew..... SPT rely on local authority contributions to sustain this service. It is difficult to sustain this service when patronage is declining”.	Glasgow City Council	Comments Noted - The Yoker-Renfrew ferry is included in diagram 19 however has been obscured by other symbols. This will be rectified for the final diagram.
69	Table p.68 and diagram 20 “ <u>Lochranza to Claonaig ferry route</u> and Brodick - Troon timberlink route missing”.	North Ayrshire Council; COAST (re timberlink route)	Timber is moved off Brodick by boat, but this is not part of the formal Timberlink network. The Lochranza to Claonaig ferry route is included in diagram 19 but as it is only a summer service it is considered neither a Key nor Lifeline Ferry Route.
70	Policy S&T1 (Ferries) “suggests that the policy should give consideration to small tourist oriented ferry services, e.g. potential for the development of services into the National Park using the pier at Blairmore and potentially into Arrochar. Additional ferry operators like Clyde Marine are not mentioned. In order to be sustainable the infrastructure needed to support ferry services will need to fulfil a number of functions including leisure use.”  Policy S&T 2 (Public transport integration) “ supports this policy and suggests that transportation services should integrate with events such as the Cowalfest, and visitor attractions such as the Benmore gardens”	Loch Lomond and The Trossachs National Park Authority	Comments Noted  Comments Noted – your comments will be passed to Strathclyde Passenger Transport Partnership
70	Policies S&T 1 and S&T 2 (p. 70) “SPT have recently commissioned a joint study with Argyll and Bute Council and Glasgow City Council into the use of the River Clyde for Waterbus/Ferry services. The study identified a number of routes...At present SPT are forming a steering group to take forward the recommendations of this study. The potential for this type of service should be incorporated into the [Plan]”  Policy S&T1: “suggest that the word ‘current’ is removed from this policy.”	Argyll and Bute Council	Comments Noted – SPT will be consulted as to status of these proposals as Plan is revised  Second part of the policy recognises possible future expansion
71	“Timber barge on Arran is missing”	COAST	Diagram 20 currently shows only the Timberlink network, The Arran Timber barge will be added in the revised Plan.
71	Policy S&T3 (Freight handling infrastructure, p71) “supported and consistent with the National Park Plan policy TR 2 Improving the Transport Network.	LLTNPA	Comments Noted
71	Policy S&T3 “transfer of freight from road to rail or sea accords well with our Local Transport Strategy... Argyll and Bute has approx. 10% of the total UK coniferous plantation. The shipment of timber by sea and rail to relieve	Argyll and Bute Council	Comments Noted: the revised Plan will be redrafted to include mention of (rural) roads within the main policy while further details

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	pressure on our roads has been achieved at three principal locations (details of annual tonnages given). Does this policy exclude areas that [we] would want to promote as multimodal transshipment hubs? Timber transshipment does not seem to be covered by the policy...first sentence of the policy could be reworded to read 'Development of new transshipment hubs which allow movements between road, rail and shipping should be promoted' [and] 2nd and 3rd sentence [...to ..'Local Development Plans have identified a number of potential multimodal hubs, including Hunterston, Greenock Ocean Terminal and Ayr harbour. Ports and harbours should be better integrated and incorporated into the wider transport system and supply chain'. □ This will allow encouragement of locations other than the three mentioned in the policy."		with respect to specific locations will be moved to the supporting text.
72	Policies S&T4 and S&T5 (p.72) "[We] would want to ensure that they do not affect the potential for a Hunterston to Carradale sub-sea cable link [which is] considered to be critical to the future planning for our area and future opportunities for sustainable development arising from onshore wind and new marine renewable developments. We also consider that there is potential for Hunterston to become a renewable energy hub".	Argyll and Bute Council	Policy S&T 4 will have no impact upon the potential sub-sea cable from Hunterston to Carradale. Policy S&T5: Hunterston deep water container port however is contained within the national Planning framework and as such must be acknowledged by this plan. It would not be envisaged that a sub-sea cable would be impacted by this development; however anchorage areas would need to be considered.
72	Para. 207, (Ref. Policy S&T 5) "No comments should be made about Scapa Flow, there is no evidence on which to base the statement made in the last sentence and it is outwith the remit of SSMEI"	Crown Estate	Comments Noted: reference to Scapa Flow will be removed from the revised Plan
73	"policy S&T6 is misleading. Navigation has been affected by land based proposals but this does not make Glasgow an unattractive or a difficult place to come by boat. In fact the infrastructure changes have for many made the river a more attractive place to be and the new pontoon infrastructure ensures that there are safe places to visit and berth by boat. It is possible to navigate up to Dalmarnock Bridge, Rutherglen in an unmasted craft [and] tall ships, paddle steamer and frigates still come to Stobcross Quay and Plantation Quay and will continue to do so if sufficient dredging funding, is found by the City Council and Clydeport"	Glasgow City Council	This policy is focusing upon Shipping and Transport and not leisure crafts. Though the paddle steamer the Waverly still sails to and from Plantation Quay, due to the new Finneston Bridge it can no longer sail from Anderson Quay. Also to ensure shipbuilding remains on the Clyde the impacts of terrestrial developments on navigation should be considered.
73	Policy S&T 7 (Ballast Water,) "not all ballast water is marine in origin and therefore although low salinity may give some protection against the transfer of marine non native species it may not give adequate protection against invasive species contained in water from other sources. Parasitic transfer from Scandinavian freshwater is of real concern to Scottish Water given the treatment proposed to deal with infected water bodies which may be used as a source of drinking water."	Scottish Water	Comments Noted
73 - 74	"Precautionary principle must be applied to capital dredging, improved ballast management"	Sally Campbell	See Policies S&T7 & 8

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74	Policy S&T 8 (Capital Dredging) “precautionary Approach’ needs more explanation.”	Crown Estate	Comments Noted. Text revised.
<b>Mariculture (p. 76-81)</b>			
	“this section appears to present a very one-sided view of the mariculture industry” “The Plan should help fish farming businesses to achieve aims” consistent with RSPB Scotland’s policies with respect to Scottish aquaculture on farm siting, identification of impacts and filling of knowledge gaps, adoption of Codes of Best Environmental Practice, predator control methods and feed sources”	RSPB	<p>The Firth of Clyde Marine Spatial Plan must reflect Scottish Government policy on mariculture. <b>A Fresh Start: The renewed strategic framework for Scottish Aquaculture</b> was published in May 2009 and sets out a shared vision: “Scotland should have sustainable, growing, diverse, market-led and profitable farmed fish and shellfish industries, which promote best practice and provide significant economic and social benefits for their people, while respecting the marine and freshwater environment. The industries will contribute to the overall vision for Scotland’s marine environment of “clean, healthy, safe, productive and biologically diverse seas managed to meet the long-term needs of nature and people”. The Plan through its policies and proposals tries to deliver this in the Firth of Clyde.</p> <p>Policy MAR 2 and the proposals in the action plan, in particular the development of an integrated mariculture strategy takes cognisance of RSPB Scotland’s policies in relation to aquaculture, while at the same time satisfying Scottish Governments position.</p>
	“The mariculture section of the Plan will be meaningless unless [a]broader view is taken into consideration...Clyde waters are connected to the international seas, and must be seen, not merely as a local resource to be developed in economic terms, but as a part of a global malaise that demands urgent concerted action from all countries”.	Isle of Arran Community Council	Comments Noted - Your comments will be passed to Marine Scotland.
	“[it is our view that the Plan does not fulfil] the policy objective [of] <i>promoting] a strategic approach to growing the mariculture sector...by minimising potential conflicts and providing industry and regulators with improved guidance and information to enable better decision making on appropriate locations for development.</i> but that if Policies MAR 1 & 2 are implemented then this policy	Argyll and Bute Council	To fully meet this policy objective, proposals 21 to 23 will need to be implemented.

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	objective may be met.”		
	“[Plan] talks of sustainable growth of the sector, and implies jobs and therefore the potential viability of coastal communities. I consider this as rubbish now there are automatic feeding, well-boats etc. Arran’s dependence on tourism calls for pristine water and environment. The experience here at St Molios Fish Farm is disease, waste, little environmental control, debris causing marine litter etc. “	Sally Campbell	The socio-economic review identified that in 2005 there were 265 jobs across 14 businesses in the Firth of Clyde. These jobs are concentrated in rural areas, in particular Argyll and Bute and are important sources of employment for these areas.
	“...we need to invest more in the proper management of wild fish stocks”	James Graham	See previous comments re fresh water angling
76	para. 217 “mariculture of finfish is not a solution to further increases in global consumption of seafood because of the inclusion of wild fish in feed”	RSPB	The third sentence in Para 217: “According to the Food and Agriculture Organisation (FAO) of the United Nations, most of the world’s fisheries are either fully exploited or over exploited and consequently any further increases in global consumption of seafood will be met by mariculture“; will be removed as it clouds the debate regarding the regional sustainable development of the mariculture industry in the Firth of Clyde.
76	Para. 217 “An increase in salmon farming, in the long term, is not feasible to meet increased global consumption. As wild fish stocks decline, where are you going to get fish to make into feed pellets. 5 kilo wild fish to produce 1 kilo [Salmon]!!”	COAST	See above
76	para 217 “ Carnivorous fish like Atlantic salmon and cod raised in fish farms are currently totally dependent on fish meal derived from sea fishing around the World and hence are part of the problem rather than the solution”.  Para. 219 “it is likely over the next decade or two that sea temperature rise associated with global warming could also be a severe limiting feature in terms of mariculture”	John Campbell	See above  This is something that may become an issue and trends in temperature will be monitored and the plan reviewed and revised accordingly.
76	para. 217-219 “tone...very pro-farming rather than objective and...seemingly dismissive of interactions with the environment. The statement, originating from the FAO[ ‘further increases in global consumption of seafood will be met by mariculture’] is not, strictly speaking, true of the situation in Scotland [where currently] finfish culture is based on predatory fish (salmon) whose food supply is derived from capture fisheries. It is therefore inextricably linked with the status of fish stocks at sea, unless there is a move towards feeds that are wholly or predominantly non-fish derived. This also conflicts with the statement...that the main constraint on fish farming in the Clyde is site availability.”	SNH	The Plan is written in a way that encourages sustainable development of all the key sectors. Each chapter is written in a similar tone.  See above regarding the third sentence in para 217.  Within the Firth of Clyde at the present time and for the foreseeable future the major constraint that has been identified is

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	"The situation for shellfish culture, with no external inputs required, is different, and the policy should reflect this i.e. differentiate between the two forms of mariculture rather than pool them".		availability of appropriate locations for mariculture activity.
76	Para. 217 Similar points to the above about applicability of FAO statement to finfish mariculture in the Clyde including statements that [farmed salmon have to be fed three times their own weight of other (naturally caught) fish to reach maturity] ...."	Nick Gill, Jenny Meade	See above
76	Para 217-219 "requires major revision with factually correct information. The main constraints are ecosystem destruction in the Clyde, water quality issues, dependence on fish meal from depleting stocks around the world, increase disease, algal blooms. Stakeholders in communities are no longer willing to have polluting fish farms thrust on them in the name of economic sustainability when the farms employ few people, the firms are multinationals and the local stakeholders see their marine ecosystems damaged by having to bear the pollution environmental costs, chemicals, antifouling additives and disease. The sea lice problem, well documented and researched all over the world, shows the effect on west coast young salmon heading to sea, and sea trout."	Sally Campbell	See above
76	Para. 218 Factual inaccuracies: "[Loch Striven contains active salmon farming sites but Kyle of Bute is not active]" "Sentence 4: "Production and use of units is not cyclical. In fact we practice the opposite, and try to achieve synchronised production and synchronised fallow periods across all of production area, which helps maintain effective sea lice and disease control and management"	Lighthouse Caledonia	Comments Noted - Plan will be altered accordingly
76	Para. 218 "Mussel farm in Lamlash missing in text but is on diagram 21."	COAST	Comments Noted
76	Para. 219 "note that quality is highlighted as a potential constraining factor; however WWTW discharges are not specifically identified in the text."	Scottish Water	When locating mariculture sites Waste Water Treatment Work (WWTW) discharges are taken into consideration and as such sites are usually located well away from existing infrastructure. Diffuse pollution sources are seen as a greater issue in terms of water quality.
77	Diagram 21 "outdated, and shows a number of farms which simply do not exist anymore, and have not done for several years. Furthermore the [Crown Estate) leases and CAR consents have been given up, so these sites [will not] come back into operation, not unless full planning and consultation with the [Marine Spatial Plan] is carried out, which is all the more reason to have an accurate map"	Lighthouse Caledonia	The diagram indicates licences, rather than operation farms. At the time the information was sourced it did not reflect that Crown Estate leases and CAR consents have been given up. This diagram will be updated with new data from SEPA and Crown Estate in the revised Plan. This diagram will also indicate active farms.
77	Diagram 21 no shellfish farm in Ayr, but two processors	S. Ayrshire Council	See above
78	para. 223 " more accurate to say that impacts [on biodiversity and landscape] may be controlled via the current consenting regime and subject to ongoing	SNH	Comments Noted – will be revised accordingly

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78	<p>monitoring, but should not be thought of or perceived as minimal".</p> <p>para. 223 "utter rubbish. To state that salmon farming has minimal effects is incorrect as keeping farmed salmon fed is unsustainable and pollution around farms is unacceptable. It is leading to the end of west coast wild salmon and sea trout. SEPA has this week 12th June 09 turned down an application by Lighthouse Caledonia for an increase in biomass at the existing Lamblash fish farm due to poor water quality at present".</p>	COAST	<p>In many, indeed most cases, it is possible to operate salmon farms without unacceptable impacts upon the marine environment. SEPA strives through its licensing approach to ensure that the scale of production at a given site will be within the capacity of the local environment to assimilate the wastes from the farm. Monitoring is undertaken to examine the degree of impact.</p> <p>In cases where the effects of the operation extend too far from the vicinity of the farm or the level of impact is too intense then SEPA may take action for example through reducing the site biomass or should the operator seek increased biomass through refusing such applications. In many cases however, it is possible for production of salmon to be undertaken without unacceptable impacts occurring.</p>
79	<p>para. 224 "If SSMEI had consulted with the community on Arran instead of an organisation like Lighthouse Caledonia you would have found out that there is no potential for mariculture growth around Arran".</p>	COAST	<p>This Plan is strategic in nature and considers the whole of the Firth of Clyde where there are a number of opportunities for mariculture expansion. The Plan does not specify where these opportunities are and this would be the function of the Integrated mariculture Strategy developed under Proposal 23 in the Action Plan.</p> <p>Public consultation on the draft Firth of Clyde Marine Spatial Plan ran from the 31st of March to the 26th of June. During this period a number of events were carried out across the Firth. A specific event was held in Arran, which was well attended, where the project officers listened and took on board all the comments made on the draft Plan.</p>
79	<p>Policy MAR1 "object [to this policy] – there's no such thing as the sustainable development of salmon farming/finfish – [it adds] to over-exploitation in the wild sector- and extinctions of salmon and sea trout"</p>	James Graham	<p>Comments Noted - Your comments will be passed to Marine Scotland.</p>
79	<p>Policy MAR1 "Apart from shellfish the relationship between sustainable</p>	John Campbell	<p>Comments Noted - Your comments will be</p>

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	development and mariculture must be considered spurious”		passed to Marine Scotland.
79	Para. 228 (re Policy MAR1) “SSMEI need to research this much better. This is nonsense and is contrary to common scientific knowledge”	COAST	Para 228 deals with the main reasons for applications which are submitted to local authorities being refused and the provision of improved guidance on landscape/seascape impacts of new developments.
79 - 80	Policies MAR1 & MAR2 (p79-80) suggest should be amalgamated with proposed strategy being used to identify potential for expansion and location of suitable sites for mariculture. “welcome strategic approach proposed in MAR 2 [but]...believe...should not only be resource led but seek to deliver other [Plan objectives] through minimising environmental impacts and avoiding areas of biodiversity value...[as suggested in the SEA]”	SNH	Comments Noted – policies MAR 1 and MAR 2 will be amalgamated in the revised Plan with an emphasis on the appropriate location of farms.
79 - 80	“consider that Policies MAR 1 and MAR 2 should be amalgamated into a single policy. The FRS Locational Guidelines only focus on the capacity of an area to accommodate finfish aquaculture in terms of benthic impact and nutrient enrichment. It is important to note that other constraints such as landscape or interaction with other activities are not considered...Policy MAR 2...would need to be consistent with our Development Plan policy on Aquaculture (LP AQUA 1) and with the Loch Fyne ICZM plan. [We] would like to have seen this work undertaken as part of the plan development and at the very least an assessment of where finfish development should be discouraged to maintain a firebreak between the existing Area Management Areas (Clyde and Arran). [which] should be shown in Diagram 21.”	Argyll and Bute Council	The aim of MAR 2 and Proposal 23 <b>Develop an Integrated Mariculture Strategy</b> , is to build upon the FRS Location Guidelines and included aspects such as landscape/seascape and interaction with other activities.  This work has not been undertaken as part of the development of the Plan due to resource constraints.
79 - 80	Policies MAR1 & MAR2 “We would wish our...rights to discharge effluent into the marine environment not [to be] affected and that costs for additional treatment at existing operational assets are not imposed. We recognise there is a need to integrate links between Scottish Water and Local Authority planners and to ensure that a consistent approach is adopted by various Planning Authorities to site location and appropriateness of development to site.”	Scottish Water	It is envisaged that buffers would be established around the existing Waste Water Treatment Works. Discharges would be a constraint within any integrated and coordinated spatial strategy for mariculture. This would ensure that new developments are sited in appropriate locations taking into account all constraints.
79 - 80	Policies MAR1 & MAR2 “recognises that mariculture is an important economic development opportunity for communities...supportive of further work and investigation into landscape and other environmental impacts of mariculture [and of] development of a strategy which identifies suitable areas for mariculture provided that environmental (including landscape) considerations are incorporated”	Loch Lomond and The Trossachs National Park Authority	Comments Noted
80	Para 231 (Policy MAR 3) “The Lighthouse Caledonia fish farm in Lamlash Bay has had serious disease, overstocking etc, and the community found out only by the smell of rotting fish and the FOI Act. Hardly good consultation with the local community. This lack of consultation with multinationals over potential fish	Sally Campbell	Comments Noted

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	farms was shown on Arran with the Marine Harvest planning application for Clauchlands. The community was angered by the lack of consultation. Thankfully the fish farm was turned down by North Ayrshire and on appeal”.		
80	Policy MAR 3 (Pre-application consultation) “consistent with good practice encouraged by the NPA”	LLTNPA	Comments Noted
80	Policy MAR3 “support carrying out pre-application consultations and would wish to be included in the list of stakeholders to be consulted”	Scottish Water	Comments Noted - Your comments will be passed to Marine Scotland.
80	Policy MAR3 (p. 80) “Pre-application consultation is an important feature of the reformed terrestrial planning system so there is probably no need for this policy and ..... it could equally apply to other marine/coastal developments”.	SNH	The Marine (Scotland) Bill provides local authorities with the ability to give up the development consent for marine fish farming. Where a local authority chose to give up the development consent for fish farming, then fish farming would become a licensable activity within their area. Therefore features of the reformed terrestrial planning system would have no jurisdiction over fish farm licenses. It would therefore be prudent to retain this policy at this time.
80	para. 231 (re Policy MAR3) “not our experience on Arran. Multinational fish farms have a poor record of open consultations with community. Arran’s experience is that advice from the community was constantly ignored. Indeed advice from SNH regards the Clauchlands site was ignored for over 2 years.”	COAST	Comments Noted
80	Policy MAR 4 “should include any finfish species not just salmon”.	Argyll and Bute Council	Comments Noted – this will be amended accordingly as the Area Management Agreement also includes wild trout stocks.
80	Policy MAR 4 (Protecting wild salmon) “supportive of this policy”.	LLTNPA	Comments Noted
80	Policy MAR4 (Protecting Wild Salmon) “AMAs don’t protect wild salmon [there are no AMAs] in the Clyde Salmon Fishery District anyway)”	James Graham	This policy is aimed to cover those areas where fish farming is present and to encourage all producers within the Firth of Clyde to sign up to and operate within the relevant AMA.
<b>Fishing (p. 82-88)</b>			
	<p>“[it is our opinion] that overall this [plan] does not fully support [our policy position as set out in Recommendation REC CP 2 (Sea Fishing Interests) of the approved Argyll &amp; Bute Structure Plan 2002. [This] was made in order to address land use and ecological concerns relating to depleted fish stocks and sustainable sea-fishing, including:</p> <p>“B) Local Commercial fishing interests be given appropriate support to achieve a local fishing – and local community based approach to sustainable sea-fishing having regard to</p> <ol style="list-style-type: none"> <li>1. International and national competition for depleted fish stocks</li> <li>2. Consequential adversities in the communities and settlements which support</li> </ol>	Argyll and Bute Council	<p>The scope of the SSMEI Pilot Project excluded management of fish stocks as this was seen to be better performed by the newly set up Clyde Inshore Fisheries Group (IFG). The IFG is developing a management plan for the area which will reflect local priorities.</p> <p>Also of note are the Marine Protected Area mechanisms included in the Marine</p>

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	and depend on local commercial fishing fleets 3. Pursuance of more control of in-shore waters by local communities and the pursuance of 'conservation order' approaches 4. Establishing recovery regimes and management of over-fished sea lochs"		(Scotland) Bill.
	"The Clyde needs to be closed to the mobile sector to be able to regenerate. Jobs could be saved by making the Clyde a static gear only area"	Tony Wass, A.S.W. Fishing Charters	Comments Noted – Your comments will be passed to the Clyde IFG and Marine Scotland.
82	"no mention of diving for razorfish"	Argyll and Bute Council	Comments Noted – will be included in revised Plan.
82	Context should reflect and refer to Scottish Government commitments in the Sustainable framework for Scottish Sea Fisheries	RSPB	Comments Noted
82	Para. 238, "map showing the location of all of the existing restrictions on fishing activity within the Clyde area would [be] helpful here. The text does not represent the full range of spatial restrictions currently in place".	SNH	Comments Noted – map will be updated in the revised Plan in consultation with SNH and Marine Scotland
82	"The public have a right to fish by law, yet the mobile fisheries dictate policy. Nowhere in the draft is this acknowledged. .... There appears a lack of stakeholder consultation in this section- more a sense that just the mobile fisheries sector was consulted".  Para. 240, "There could be sustainable fishing in the Clyde but not until there is a strategic non-voluntary plan to reduce the negative impact of bottom dredging and trawling on young stocks of white fish. There were large numbers of line fishermen in the Clyde supporting tourism etc. All gone- giving the Clyde ecosystem a chance of regeneration may well give tourism and that industry a new lease of life".	Sally Campbell	The scope of the SSMEI Pilot Project excluded management of fish stocks as this was seen to be better performed by the newly set up Clyde Inshore Fisheries Group (IFG). The IFG is developing a management plan for the area which will reflect local priorities.
82	Para. 240 "agree but not until Government and the Fishing Industry decide to allow regeneration of fish stocks by reducing the impact of fishing methods"	COAST	Comments Noted – Your comments will be passed to the Clyde IFG and Marine Scotland.
83	Para. 243 "Not perceived, but reality of conflicts between static, creelers etc and the mobile sector. Damage by mobile gear to maerl beds, and other nursery beds for the marine ecosystem are observed regularly around Arran."	Sally Campbell	Comments Noted
83	Para. 243 ""perceived" must be deleted. There is plenty of scientific proof regarding damage done by trawling and dredging"	COAST	Comments Noted
84	Objectives "the sensitivity of habitats and species could be measured in terms of both biodiversity and fishery importance e.g. some [nursery] habitats could be considered sensitive due to their importance to a commercial species....., while some [such as maerl] have both biodiversity and fishery importance. Therefore ..... suggest [that third bullet point] reads 'Protecting important habitats and species from fishing operations that may be damaging to them'.	SNH	Suggested change to wording agreed and will be included in revised Plan
84	Objectives: "how can the prawn fishing be "sustainable" – they've wiped out everything else and that's all that's left .....What we need is more initiatives like the Lamlash Bay no-fishing zone"	James Graham	Comments Noted: the Marine (Scotland) Bill includes provision for creation of Marine Protected Areas

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84	Policy FISH1 “Believe that... Marine Planners [should] prepare the guidance and identification referred to.” Therefore suggest that wording at start of second sentence be changed to “The fishing industry should be encouraged to contribute to guidance ...” Would also like the last sentence redrafted to make pre-application consultation with fishing industry representatives the norm	SFF/CFA	Comments Noted; however, current wording was agreed by the project Steering Group, of which CFA is a member, and will therefore be retained
84	Policy FISH 1 “Safeguard of fishing grounds. The potential for regeneration will not happen whilst destructive practices are allowed. This includes new fisheries being mentioned, such as razors etc. Precautionary principle must be applied...”	Sally Campbell	Comments Noted – see above
85	Para 248 (p. 85) “welcome recognition that ...industry should focus on increasing value ...rather than increasing quantity of stock removed”	RSPB	Comments Noted
85	Para. 248 (re FISH 2 “This is hard to accept, and scientific evidence points the other way entirely”	Sally Campbell	This paragraph relates to removing fewer but higher value (shell)fish from the sea, Evidence exists in a number of locations throughout the UK such as the crab fisheries off Shetland and the scallop fisheries off the Isle of Man.
85	Policies FISH 2 & FISH 3 “are terrestrial policies...a marine spatial plan would have no say over road building”	Crown Estate	The Plan aims to complement and seek to influence terrestrial plans. Terrestrial focused policies and proposals are included for guidance and it is to be hoped that these will be considered in future terrestrial strategic and local development plans, as these are prepared. Such policies focus upon issues that impact upon marine related activities.
87	Policy FISH 4 “welcome, but concerned that no mechanism for delivering this protection is proposed. Request [addition] of commitment to identifying areas sensitive to fishing activity...[which] could help inform implementation of voluntary measures suggested in FISH5”  Para 253 “should recognise that some damage does occur in the Clyde as a result of fishing activity” “Agree that...study to identify full degree of the impacts could help inform sustainable management” but concerned that this is not proposed within the Plan (see comments on Action Plan)	RSPB	Proposals 5 and 28 in the Action Plan seek to address such concerns
87	Paras. 252-253 “Not true: there is plenty of scientific evidence regarding the damaging impact on the seabed. There is no need to further scientific evidence to prove this”	COAST	Comments Noted
87	Policies FISH 4 & 5 “VOLUNTARY (why?) protection of habitat and species informed by mapping of fishing activity and intensity. This sounds like “leave it as the status quo” and in no way can this be allowed in the future. Clyde is already the Newfoundland equivalent in Scotland. White fish collapsed through	Sally Campbell	The project remit was to consider the potential of the voluntary approach in managing Scotland’s marine and coastal waters. What has been developed is a

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	<p>overfishing and the mentality of fish/profits for today. The Nephrops (prawn) industry is only there because of the decimation of white fish. Soon that industry will collapse too.”</p> <p>Paras 252 &amp; 253, p. 87 “the fishing industry appears incapable of delivering on this. There is enough evidence of the destruction- just a delaying tactic not to do anything until after “research”. The collapse of white fish stocks is evidence!”</p> <p>Para. 255, p.87. “The Nephrops fishing is the end of the line in terms of degradation of biodiversity. It is not sustainable longer term, and is only there because the white fish stocks have collapsed. Using their methods of collection gives the ecosystem no time to recover. MSC Certification is a pure cover to continue the policies of the last 30 years in the Clyde and elsewhere in Scotland”</p>		<p>voluntary plan for the Firth of Clyde. The policy environment within which the plan has developed has changed dramatically and a Marine Bill is currently before the Scottish Parliament. This will deliver statutory marine planning and includes mechanisms for the implementation of marine Protected Areas.</p> <p>The MSC's fishery certification program and seafood ecolabel recognise and reward sustainable fishing. They are a global organisation working with fisheries, seafood companies, scientists, conservation groups and the public to promote the best environmental choice in seafood.</p>
87	<p>Policy FISH 4 “agree...important to protect sensitive habitats and species, but this policy fails to recognise that fisheries are dependent on these habitats and species. We would suggest that the policy reinforce the fact that environmental protection has as a great rationale for fishery management purposes as it does for conservation of biodiversity...the policy objective should point towards ‘minimise the environmental footprint of fishing’ rather than just addressing one, albeit important, aspect...i.e. sensitive habitats”</p>	SNH	Comments Noted
87	<p>Para 253 “In our view the need to stop trawling now in areas such as Upper Loch Fyne is adequately demonstrated by evidence and experience from Norway, New Zealand and even the Isle of Man and Cardington Bay. If such studies are deemed necessary trawling should at least be suspended in the interim...scallop fisheries are many times more productive if the scallops are harvested by diving rather than by dredging. Commercial diving for scallops is increasing rapidly in our area and it is clear that transferring entirely to this harvesting method would have profound beneficial effects...Upper Loch Fyne would then revert to the fish nursery role it had up until 20 years ago.”</p> <p>“trawling has only been permitted in Loch Fyne for the last 20 years or so during which time recreational fishing has drastically deteriorated. Local divers report on the desertification of the bottom of the loch...We have seen trawlers operating in Loch Shira to the detriment of the firework anemone found there despite a “voluntary agreement”...We are also very concerned about the damage being done to maerl beds in Loch Fyne as reported by Hall-Spencer</p>	Strachur Community Council	Comments Noted - Your comments will be passed to the Clyde IFG and Marine Scotland.

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	and Moore (ICES Journal of Marine Science, 57: 1407-1415, 2000). All of these contradict the assertion in [Para 254]		
87	Para. 254 (re Policy FISH 5) "Insert "members of the steering group perceive this": in reality this is just not true."	COAST	It is recognised that the voluntary restriction on trawl fisheries in Upper Loch Fyne and Loch Shira was initially entered into in light of concerns about impacts on migratory salmoniids and associated freshwater angling interests. However, this has had positive spin-off benefits for wider biodiversity interests, including the fireworks anemone. The Marine Spatial Plan promotes the use of voluntary measures to assist conservation of priority species and habitats. Prior consultation with relevant stakeholders, including SNH, is seen as an important step in developing such measures.
88	Para 257 "voluntary closures and restrictions have been proven over time not to work in the fishing industry"	COAST	The voluntary restriction on scallop dredging within the Sound of Arisaig SAC, which forms part of the Management Plan for that SAC, has been in place for several years and is generally regarded as effective in meeting management objectives.
88	Para. 257 "Too often, voluntary closures are too short in time, and too limited in area. The sea bed requires much longer to recover."  Para 258, p. 88 "What about invasion of the Clyde coastal waters by UK fishing interests from outside the area? The Clyde IFG has such representatives on it, whilst no local community stakeholders. That cannot be permitted."	Sally Campbell	Comments Noted - Your comments will be passed to the Clyde IFG and Marine Scotland.
<b>Energy, Subsea cables and Pipelines (p. 89-93)</b>			
90	Diagram 22 "includes "Long Sea Outfalls from Waste Water assets and it is perhaps inappropriate for them to be highlighted in the context of this section."	Scottish Water	This chapter will be re-titled Energy and Subsea Infrastructure. It is felt that these assets should be included and that potentially a policy relating to them and developments around them be developed, similar to Policy S&T 4.
92	Policy ESC&P1 "generally supportive of need for generation of electricity from renewable sources but "consenting of developments must not be based on the concept...of overriding national interest. In the...Clyde developments would necessarily give rise to displacement of fishing effort which...could lead to beyond sustainable effort in remaining areas...planning of any such development [should] ensure that gain is not made at the expense of existing	SFF/CFA	Comments Noted

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	locally based and sustainable use”		
92	Policy ESC&P1 “Recommend substitute “technically and environmentally appropriate locations “ for “appropriate locations”	RSPB	Comments Noted. The supporting text for this policy sets out such constraints.
<b>Implementation (p. 95-97)</b>			
	“Any operational frameworks need to be sensible, proportionate, underpinned by scientific assessment and to the benefit all stakeholders; they should also be open, inclusive and structured to meet the demands of today”	SSACN	Comments Noted – this is our intention
	“..until [SMRs] are set up Clyde Forum should continue to work with the SSMEI provided [Scottish Government] funding is available...Concerned about “additional work required to implement a voluntary plan where no additional financial support has been given to the Council”	S. Ayrshire Council	Comments Noted
95	Para. 276 (FoCF) “This omits to describe the absence of community stakeholders. If things are to change it cannot be “business as usual” with just representatives from the usual groups with power. If inclusion is to be made real with the Marine (Scotland) Bill, there needs to be real inclusion from the bottom up, not just the “usual” power blocks”.	Sally Campbell	This paragraph proposes that the Firth of Clyde Forum Core Group be the foundation of the stakeholder-regulator partnership. Paragraph 277 indicates that additional members may be added. This might potentially include elected representatives, but the composition will be agreed through discussions between the FoCF and Marine Scotland. No decisions have yet been made concerning statutory regional planning bodies under the Marine Bill
95	Para. 276 (FoCF) “Disagree. FoCF does not contain representatives of all stakeholder bodies within the Clyde...contains many bodies that are responsible for the dire state of the Clyde.”	COAST	See above
95 - 96	<p>Role of FoCF and proposed model implementation body (para. 276-280) “any immediate implementation will be primarily dependent on further co-operation and consensus building amongst a wide variety of agencies [and]...the Firth of Clyde Forum would seem to be the obvious channel for this. There are, however, two important caveats to that presumption.</p> <p>[1]...there needs to be a fundamental review of governance. If a Model Implementation Body is to be established then the Firth of Clyde Forum Core Group is not fit for purpose. Yet to change that structure to engage those who might also be seen as members would make the whole process unwieldy and a committee structure may need to be developed with a degree of subsidiarity. This requires exploration in some detail.</p> <p>[2]...additional financial and administrative support will be required both for the Forum and its members and presumably to extend the life of the current project team...given this could be a forerunner to how SMRs are to be implemented in the future...this would suggest that if the Model Implementation Body is to</p>	North Ayrshire Council	<p>Comments Noted – the inherent tensions between inclusivity and workability are recognised and will be a focus of the Clyde Pilot’s work in the coming months.</p> <p>Comments re funding will be passed to Scottish Government.</p>

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	develop then funding should be direct from Government. Councils in Ayrshire have already raised the issues surrounding both funding shortages and the skills gap if asked to take on additional roles or functions in relation to marine spatial planning.		
95 - 96	“ note that there are no statutory powers in place to implement the Plan and that a voluntary partnership approach is proposed...Scottish Water propose becoming a corresponding member of the Forum, this is consistent with our approach to similar Fora across Scotland”	Scottish Water	Comments Noted
96	Model Implementation Body: “support proposal to deliver the Plan through stakeholder regulator partnership based on FoCFCG...before a SMR covering the Clyde is established [but this] would require significant resources and staffing”  “will need to be a move away from a facilitating role to one of assessing the different sectoral needs and devising optimal solutions for delivering the Plan vision...suggest that staff charged with delivery need to be given this ‘planning function’ ”  “careful consideration needs to be given” as to how Clyde Area Management Plan and Clyde IFG can be managed alongside implementation of the Plan to “deliver the most for each process”	RSPB	Comments Noted. These considerations will be kept under review during the implementation phase.
96	Model Implementation Body: “consider that it is appropriate for the Plan to be implemented by a voluntary integrated stakeholder-regulator partnership, until [statutory] regional marine planning is established...consider that it is important to continue the momentum and work that had been undertaken to date, rather than waiting until statutory regional marine planning is in place...agree that the Firth of Clyde Forum Core Group could be the foundation of a stakeholder/regulator partnership to implement this plan in the short term, but recommend that the representation of this group is reviewed to ensure that all relevant parties are involved.”	Argyll and Bute Council	Comments Noted
96	para. 277(Model Implementation Body) “not clear [from wording] whether a decision to set up an implementation body has been made or not”  para 278 (Clyde Moorings Committee – CMC) “CMC has delegated powers...to grant consents under section 34 of the Coast protection Act, its role is therefore [not just advisory]”	Crown Estate	A decision had not been made as this is something that the project team were looking to get feedback on during the consultation process. It would appear from the comments received that this is perceived as being the best way to move forward at this time until a statutory system is in place.  Comments Noted - the plan will be amended accordingly.
96	Model Implementation Body: “agreed that the [voluntary] MSP is most	West	Comments Noted

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	<p>appropriately implemented by an integrated stakeholder-regulator partnership [based on FoCFCG]...it is important the implementation...builds on existing structures and partnerships [and] RBMP Area Advisory Groups are identified as one particular example where synergies with marine spatial planning should be examined and developed. Ultimately, it may be necessary for a lead body to manage and provide the impetus for this partnership approach in addition to administrative and financial support, replicating SEPA's role in river basin management planning."</p> <p>Existing Statutory Process : "The [anticipation] that local authorities and regulators will have regard to the Plan in the determination of development applications or consents...is an appropriate approach...Furthermore, a key aim of the MSP is to complement and seek to influence terrestrial plans. Where policies within the MSP have implications that extend above MHWS and thus fall within the scope of land-use planning it is considered that mechanisms for achieving the required integration should be considered further, for example Policies within the MSP (e.g. ENV6) which are most appropriate for translation into development plans could be highlighted. It is also important that local authorities and regulators are fully engaged with implementation structures, in this instance the integrated stakeholder-regulator partnership"</p>	Dunbartonshire Council	
96	Existing Statutory Process: "Subject to changes to the current draft marine plan, it may be appropriate for the Council to consider agreeing to have regard to a final version of the plan as a material consideration in the planning consent process or to consider the potential for parts of it to be used as Supplementary Guidance in the future."	Argyll and Bute Council	Comments Noted
96	Existing Statutory Process: "Plan anticipates that Councils will have regard to the plan in the determination of development applications and seek to incorporate part, or all of the plan as supplementary planning guidance and for it to become a material consideration in the planning consent process. In the short term this presents considerable difficulties. The Draft Plan is currently voluntary. It will only become transposed into law through the Marine (Scotland) Bill currently before Parliament. It is envisaged secondary legislation will be required to establish regional SMRs and that national marine plan for Scotland will precede SMRs. It will be some years therefore before the plan has a statutory base. North Ayrshire Council are already progressing a new local development plan and the current timescales would preclude any inclusion of the plan into this formal process. Nevertheless, it is noted that policies are generally supportive of the terrestrial planning process, and some aspects of the plan extend current knowledge as applied to the marine environment. This would suggest that in the preparation of the current local development plans the general ethos of the plan can be incorporated as part of the background appraisal work. It is considered that formal adoption of the	North Ayrshire Council	Comments Noted

Page	Comments/Concerns	Origin	Response
	Draft Plan as supplementary guidance to the local development plans would need to wait both for statutory approval of the Marine (Scotland) Bill, any relevant secondary legislation and consequently for the second iteration of the local development plan.”		
96	Monitoring “essential in order assess its implementation and progress against aims and objectives. It is considered that the lead body (the ‘SEPA equivalent’ proposed above) would be best placed to carry out this monitoring and also to update the Plan within the recommended five-year cycles. A monitoring regime should be developed as part of the final MSP and it is recommended that an important element of the monitoring proposals include the review of statutory development plans with regard to how they integrate with the MSP”	West Dunbartonshire Council	Comments Noted – it is recognised that the monitoring aspect for the Plan needs to be further developed. This will be done during implementation phase.
96	Monitoring “does not say what will be monitored to ensure the plan is meeting its aims. This needs to be developed further.”	Argyll and Bute Council	See above
97	Reviewing “support proposed timetable”	Scottish Water	Comments Noted
<b>Proposed Action Plan (p99-102)</b>			
	<p>“Action Plan ... details potential partners and the target year for delivery of specific proposals. Resources to deliver the policies and proposals have not yet been allocated ... may be sensible to split the current action plan into proposals that could be delivered by the Clyde Pilot project in the short-term (until 2012) and those that should be taken forward as part of any future statutory regional marine plan.</p> <p>[We require clarity on] the resource implications and costing of the Action Plan...before [being] able to commit to any individual actions. Although...not currently in a position to sign up to delivering relevant proposals...[we] recognise the importance of delivering these proposals to ensure sustainable use of the Firth of Clyde [and] I look forward to further discussions on the action plan and to involvement in the prioritisation of these proposals.”</p>	Argyll and Bute Council	<p>The Action Plan in the draft Plan contains a range of proposals that need to be carried out to enable policies within the Plan to be delivered. It is recognised that not all the proposals will or can be carried out at this time. The action plan will be prioritised before the final draft and those proposals that can be delivered will be included.</p> <p>It is acknowledged that the funding of proposals within the action plan has not been clarified. Discussion will have to take place with the partners as to funding sources for what has been proposed.</p>
	“supporting of the action plan in general, particularly actions relating to recreation and tourism, environment and mariculture”.	LLTNPA	Comments Noted
	“lack of inclusion of sea angling interest as 'Potential Partners' in many of the Proposed Action[s]”.	SSACN	The proposed partners suggested was very much an outline of who may be involved. When projects have been identified for inclusion n the revised Plan a more detailed list of partners will be created.
	“ may be useful to develop this further to prioritise the delivery of policies and to relate the timeframe to the introduction of [statutory] regional marine planning...resources implications and [delivery] costs are crucial before any partners could commit to any individual actions”	West Dunbartonshire Council	Comments Noted
	[Detailed actions within the Proposed Action Plan] should reflect three aspects	RSPB	Comments Noted

Page	Comments/Concerns	Origin	Response
	<p>of implementation of this Plan:</p> <p>Projects for direct delivery of Plan policies and actions Studies to inform Plan reviews in 2010, 2012 Production of next version of Plan in spatial format]</p> <p>Welcome inclusion of action plan but “believe that individual actions need to be broken down further and presented in more detail to make both implementation and monitoring more manageable” ...and [should include] actions relating to Plan review and revision [and splitting of ] proposals 1 and 7 into development of strategies and their implementation.</p>		
99	<p>Proposal 3 (re. ENV2) Add further proposal “identify and map areas where conservation measures could benefit the environment and industries relying on environmental resources”</p> <p>Proposal 4 (re. ENV3) “should include mapping of important areas”</p> <p>Proposal 5 (re. ENV4) [needs more explanation]</p>	RSPB	Comments Noted
100	Proposal 8 “will be important to consider the practicality of local authorities assessing visual impact, particularly views from sea to land, from a marine perspective”	West Dunbartonshire Council	Comments Noted
100	Proposal 9 (p.100) “Great to have a litter co-ordinator!”	East Esplanade Protection Group	Comments Noted
100	Proposals 9, 10 &, 11 for ENV 11 (p.100) “potential partners do not include any of the existing initiatives involved in tackling the problem of marine litter (e.g. Fishing for Litter, The Green Blue, The GRAB Trust and the Marine Conservation Society)...consideration should be given to involving representatives from these initiatives in the development of the strategy and in working collaboratively with the Marine Litter Co-ordinator. As...a non-profit making organisation with charitable status...[Grab Trust] would hope that there would be sufficient funds made available to allow us to continue to develop our work in relation to marine litter and to work in partnership with the SSMEI Clyde Pilot.”	GRAB Trust and Argyll and Bute Council	<p>The proposed partners suggested was very much an outline of who may be involved. The exclusion of existing initiatives was an oversight. When projects have been identified for inclusion in the revised Plan a more detailed list of partners will be created.</p> <p>Further discussion with the project partners is required regarding funding of all proposals.</p>
100	Proposals 9, 10, 11, 12 anticipate participation in the proposals with respect to sewage related debris”	Scottish Water	Comments Noted
100	Proposals 9, 10, 11, 12 “would be interested in supporting [this] work [and] for point 12...have some information on visitor numbers to award beaches in the Clyde that we would be happy to share”	Keep Scotland Beautiful	Comments Noted
101	Proposal 17 considers that this is an issue for SEPA...any investigation would be led by SEPA with SW in a support role as required or directed.”	Scottish Water	Comments Noted
101 -	Include wildlife watching and ecotourism in proposals 12, 14, 19	RSPB	Comments Noted: the revised Plan will

Page	Comments/Concerns	Origin	Response
102			more explicitly consider such activities
102	Proposals 21 and 22 “no potential partners are identified”	North Ayrshire Council	This is a printing error. The action plan will be rationalised to include those proposals that can be delivered and that partners will sign up to.
102	“welcome proposals 24 to 28 ....and consider these to be of a high priority for implementation.	Argyll and Bute Council	Comments Noted
102	“Welcome proposals 27 and 28 but additional action needed to identify and map areas where conservation measures would be beneficial to biodiversity and long-term needs of fishing industry Study in proposal 23 should also indicate areas of sensitivity to mariculture development”  “Amend detail of proposal 28 to specify that effects not fully understood throughout Clyde”	RSPB	Proposal 3 <b>Map areas where particular activities could impact upon sensitive species and habitats</b> will include mariculture development. This information will be fed into Proposal 23 <b>Develop an integrated mariculture strategy.</b>  Comments Noted – will be amended accordingly

**Table A2d General Comments Concerning Format or Presentation of Draft Plan**

Comments/Concerns	Origin	Response
<p>“layout generally clear”</p> <p>“mapping [is] most significant problem .....in many cases [inadequate] key and colour coding is confusing”</p>	RSPB	<p>Comments Noted</p> <p>Comments Noted – There was difficulty in trying to present the information on the Firth of Clyde on an A4 page. Further work will be carried out on the diagrams for the revised Plan.</p>
<p>“The background and contextual sections...are useful and the use of colour coded tables and matrices, with the pull-out key at the front, are well designed”.</p>	SNH	Comments Noted
<p>“to facilitate the understanding by people less intimately involved with the various processes, it is felt that a much simplified 'Executive Summary' could have been made available for many of the documents, and especially for The Plan itself.”</p>	SSACN	Difficult to produce such a summary for the Plan itself as it needs to be considered as a whole.
<p>“the number of errors throughout the document is disappointing ... have highlighted the most obvious”</p> <p>Crown Estate also highlighted some issues with formatting including layout of pages 34-35 and various inconsistencies in formatting and positioning of paragraphs (e.g. paras. 61-64, p. 27-28; paras.65-66, p. 30).</p> <p>With respect to diagrams Crown estate highlighted lack of explanation of some keys and inadequate cross-referencing between diagrams and text (e.g. diagram 77, p. 21)</p>	Crown Estate	Comments Noted
<p>“struggle to understand the process and documents you have produced”</p>	Kathy Sayer	Comments Noted

**Table A2e Comments Concerning Process of Plan Development**

Comments/Concerns	Origin	Response
<p>“Project team have made every effort to engage with stakeholders [but concerned] that the process, which placed considerable emphasis on the needs of individual sectors, does not take the holistic, integrated approach...hoped for”</p>	RSPB	<p>The approach taken to the explicit inclusion of outcomes from the SEA and sectoral interactions study within the Plan was intended to provide a holistic approach to the integration of the sectoral Plans.</p>
<p>“[wildlife tourism] aspect to the tourism sector has been omitted largely because of the attendees at the sectoral workshops, with environmental bodies being separated from this group”</p>	RSPB	<p>The policies within the Plan were not written at the Sectoral Workshops, but in conjunction with the steering group. The sectoral workshop enabled the project team to find out the strategic aspirations of sectors and how they felt the Plan could help them develop sustainably in the future. The revised Plan will more explicitly consider issues such as wildlife tourism.</p>
<p>“welcome the approach taken by the Plan to ensure stakeholder involvement, we are committed to working in partnership as far as is permitted by the resources contained in our financial settlement agreed with ministers and regulators”.</p>	Scottish Water	<p>Comments Noted</p>
<p>“very impressed at the way the SEA for this Plan was started early and developed alongside the Plan. This is welcome as it enables policies to be fine-tuned to avoid unforeseen environmental impacts”.</p>	SNH	<p>Comments Noted</p>
<p>“It is felt that having the membership of the Steering Group consist of the Firth of Clyde Forum Core Group has resulted in other interests, especially that of the recreational sector, having not been given equal attention ....“Openness and transparency are still a major issue – ongoing communication has been poor”.</p>	SSACN	<p>The Firth of Clyde Forum Core group was identified as the most appropriate body to act as the steering group. No request was made by SSACN to join the steering group during the development of the draft Plan.</p> <p>It has been recognised that communication from the project could have been better. This however is a result of the limited resources available to the project team.</p>
<p>“extraordinary that the extensive and detailed professional research undertaken by COAST during the long task of setting up the No Take Zone (NTZ) in Lamlash Bay was completely ignored. The NTZ....exists in order to provide a demonstration of how marine stocks can regenerate if they are protected from human predation and offers a workable model for a tenable way forward .. yet the Plan makes no word of reference to it.”</p>	Isle of Arran Community Council	<p>Please see Appendix 3 for full description of use of SeaSearch data collected by COAST and others within the planning process.</p>
<p>“As the largest island in the Clyde, with &gt;60 miles of coastline and population of &gt;5,000 why was Arran not directly consulted in the 3 years of the project? Visions require inclusion of all stakeholders, not just the “usual consultees” or</p>	Sally Campbell	<p>We carried out a public consultation on the draft Firth of Clyde Marine Spatial Plan from the 31st of March to the 26th of June. During this period we carried out</p>

Comments/Concerns	Origin	Response
<p>“in-group”. The power of such “in-groups” needs to be challenged and smaller, less powerful stakeholders have to be included, so a more complete picture of the real issues is addressed”.</p> <p>“The power of the fish farm lobby must be curtailed by involvement of local stakeholders.”</p>		<p>a specific event in Arran, which was well attended, where the project officers listened and took on board all comments on the draft plan.</p> <p>The steering group included representatives from 29 bodies including local authorities and conservation NGOs.</p>
<p>“attended the consultation meeting [in Brodick] and was so depressed by the jargon and hiding behind procedures. When will the Scottish Government face up to reality and the fishing lobby?”</p>	Kathy Sayer	<p>The SSMEI Clyde Pilot is not part of the Scottish Government, it is a voluntary partnership project which aims to deliver integrated and sustainable management of marine and coastal areas of the Firth of Clyde, through operation of an effective stakeholder-regulator partnership.</p>
<p>“feel that there was a lack of transparency during the 3 years of the Clyde SSMEI.....main concern .....is the complete lack of consultation with any person or body based on the Isle of Arran. .... [which] has not only left the document with many errors but has left it biased toward some members of the SSMEI Clyde Pilot steering group ..... as far as we can ascertain, no community with the exception of fishing communities based around the Clyde have been consulted before the draft was launched. used by the Clyde Forum to form the steering group was a major mistake” This COAST feels breaks the Aarhus Convention”</p>	COAST	<p>The project has been as transparent as possible at all times. The steering group papers and minutes continue to be available from the project website.</p> <p>As this is a Pilot Project it has limited resources and therefore discussions with every community around the Firth of Clyde has not been possible in the drafting of the Plan. However the Plan was put out to public consultation from the 31st of March to the 26th of June. During this period we carried out a specific event in Arran, which was well attended, where the project officers listened and took on board all comments on the draft plan.</p>

**Table A2f Comments Concerning Strategic Environmental Assessment**

Relevant Section in draft Environment Report	Comments/Concerns	Origin	Response
General	<p>“welcome detailed and extensive SEA process ... pleased with breakdown of biodiversity features ... to address wide range of potential impacts .....satisfied that results .....are clearly presented”</p> <p>“Some instances where feel output from SEA process has not been fully integrated within the Plan” “request that during Plan finalisation a thorough review of the SEA mitigation and enhancement measures is carried out to insure that the results of the SEA process are included fully within the Plan”</p>	RSPB	<p>The approach taken goes well beyond most SEA exercises with explicit inclusion of SEA results within the draft Plan and cross-linkages to relevant policies for avoidance, mitigation or enhancement. The SEA will be reviewed and revised as part of the process of revising the Plan</p>
	<p>“The SEA is a comprehensive and detailed piece of work which has undoubtedly had a positive effect in improving the detail of certain policies”.</p> <p>“t is obvious that a lot of work has gone into the Report and it is good to see the transparent thinking being developed through the process. Furthermore the Environmental Report is accessible and comprehensive and the methodologies are sound”.</p>	SNH	Comments Noted
	<p>“this response is in the context of the SEA Act and .... focuses on the environmental assessment, rather than the contents of the strategy. .... The Environmental Report is well presented and clearly considers the environmental implications of the strategy. It provides a clear account of the steps undertaken during the environmental assessment process and presents these in a logical structure”.</p>	Historic Scotland	Comments Noted
	<p>“this response is in regard only to the adequacy and accuracy of the Environmental Report (ER).</p> <p>The ER is comprehensive and well set out and SEPA is satisfied that an adequate level of assessment of the plan has been carried out”.</p>	SEPA	Comments Noted
	<p>“The SEA [summary] tables in each sectoral plan state that under environmental impacts, amenity encompasses litter, tranquillity, landscape and seascape. [We] consider that</p>	Argyll and Bute Council	Understand concern, but disagree with proposed change as this would make summary tables too unwieldy. It should be

Relevant Section in draft Environment Report	Comments/Concerns	Origin	Response
	Landscape and Seascape should be separate from the others.”		noted that within the Environment Report and associated Non-Technical Summary any specific significant issues with respect to Landscape/Seascape are identified within summary tables and text.
Assessment of Status Quo (p.45-50, Environment Report)	“suggests a more positive picture than we believe exists of current levels of biodiversity protection and enhancement ... cumulative loss of intertidal habitat continues to be a problem [and] failure of existing system to protect the marine environment that supports seabirds also means that status quo is not delivering full protection for SPAs. .... There are almost no biodiversity enhancement measures being implemented in the Clyde”	RSPB	The Status Quo assessment is based on available evidence, including that on population trends for seabirds in the Firth of Clyde. Assessments are relative to each other and, as such recognise the higher (statutory) levels of protection given to Natura as opposed to other interests. The assessment also recognises the virtual absence of protection for seabed habitats and species.
Assessment of Alternative Scenarios (p 51-57. Environment Report)	“interesting part of the Clyde SEA process ..... it would have been helpful if this work had informed discussions with stakeholders to achieve a clearer consensus on which vision is preferred and therefore what balance of uses is desired. This could give a much clearer steer for later planning decisions on competing priorities”.	SNH	This aspect of the work was discussed by stakeholders on the steering group and assisted in the formulation of the strategic framework within the Plan to support delivery of the high level aims and, ultimately, the vision.
Assessment of Environment Policies (p 59-63. Environment Report)	“does not recognise potential benefits to Communities and Amenity ... from improving the knowledge base and protecting the marine environment”	RSPB	Refer to assessment table (p.137). The specific questions asked related to community level health and viability; it was not judged that improving the knowledge base <i>per se</i> would have significant effects on these elements, but protection of biodiversity was recognised as potentially enhancing community viability.
p. 10, NTS	“Why then only voluntary protection of features such as spawning/nursery grounds for fish or shellfish “might” safeguard sectors such as inshore fisheries and tourism that contribute to the viability of coastal communities?”	Sally Campbell	Assessment recognises that safeguard of the environment may yield economic benefits, but significance of these across the Clyde as a whole will depend e.g. on number of jobs created or safeguarded relative to the total working age population.
Assessment of Communities Policies	SEA summary (para 140, p.49 in draft Plan ) “if [paths] are well made-up & above HWM surely most walkers would stay on them”	East Esplanade Protection Group	Issues surrounding potential impacts of enhanced coastal access are complex. Agree that where there are existing informal paths,

Relevant Section in draft Environment Report	Comments/Concerns	Origin	Response
			improvements to surface etc might potentially reduce direct disturbance, but this will depend on balance between increased numbers of users (including dog walkers) and the (modified) behaviours of (existing) and new users. Creation of entirely new paths may increase potential for disturbance, particularly of inter-tidal species and there is some circumstantial evidence for this within the Clyde as detailed in the State of the Environment report (p. 70)
Assessment of Recreation and Tourism Policies (summary in p. 64 of Plan)	“decent cambered tarred coastal footpaths would a) keep most people off sensitive or “tired” shores and b) make litter-dropping so obvious people might not and c) .....discourage car use and d?) make it easier to reach litter and remove it”	East Esplanade Protection Group	See above
Assessment of Mariculture Policies (p 75-76. Environment Report)	Do not accept SEA results with respect to impact of policies on biodiversity, fauna and flora or water quality as “expansion proposed in MAR1 would lead to additional negative impacts. In order to result in an overall positive impact ...the expansion proposed in MAR1 must be a result of a strategy that fully considers environmental impacts ....and then assesses potential for expansion”	RSPB	The proposed Indicative Mariculture Strategy would include consideration of biodiversity and water quality impacts in a more strategic manner than is currently the case; hence the SEA conclusion that it would represent an improvement on the Status Quo, which would see industry expansion within the existing planning regime.
Summary table on p. 81 of draft Plan	“concerns that the SEA rating ... for mariculture [in relation to Biodiversity, Fauna and Flora] may not be entirely accurate. A mariculture strategy (MAR 2) would indeed have the potential to be beneficial or at least help in mitigating, but any increase in mariculture development does carry the possibility of adverse impact, particularly for cumulative impacts as numbers of sites increase”.	SNH	As above
NTS, p. 7.	“[assessment] suggests NO adverse effects on biodiversity, flora or fauna. The sector is let off the hook by reference to INDICATIVE MARICULTURE STRATEGY (IMS) ..... we all know it is NOT environmentally sustainable, especially for predatory fish as salmon, dependent on fish meal from other corners of the world ..... the colour presentation on the charts of the effects in the future shows all POSITIVE....which will be as untrue in the future as now in	Sally Campbell	The purpose of the SEA is not to assess the overall impacts of particular sectors or activities, but rather the potential impacts of implementation of the draft policies relative to the existing regulatory and management regimes within the Firth of Clyde. This is detailed in section 4.3 of the Environment report (p 39). and highlighted in the text below

Relevant Section in draft Environment Report	Comments/Concerns	Origin	Response
	2009. The present algal blooms in Loch Fyne should be sending a clear message about this section.”		the key in the NTS.
Assessment of Fishing Policies (p 77-79. Environment Report)	Do not agree with SEA conclusion that FISH1 would result in positive biodiversity impacts as “FISH1 would not necessarily restrict fishing in novel areas or prevent development that is restricted in existing fishing grounds from being displaced to sensitive areas elsewhere”	RSPB	The assessment was that there “ <b>may</b> be positive effects, but extent and significance uncertain”, so the SEA agrees with RSPB assessment that FISH1 would not <b>necessarily</b> have such effects.
Assessment of Fishing Policies (NTS p. 8)	<p>“Why no red on the chart for the future of fisheries? The Clyde is the Newfoundland of Scotland. White fish fisheries wiped out by unsustainable fishing practices. Arran had a thriving fishing industry- now none. Destructive scallop dredging and bottom trawling have been managed on a voluntary basis and yet these methods have destroyed the Clyde white fish industry”</p> <p>“Which coastal communities depend on fishing primarily for their viability in the Clyde?”</p>	Sally Campbell	<p>The purpose of the SEA is not to assess the overall impacts of particular sectors or activities, but rather the potential impacts of implementation of the draft policies relative to the existing regulatory and management regimes within the Firth of Clyde. This is detailed in section 4.3 of the Environment report (p 39). and highlighted in the text below the key in the NTS.</p> <p>The SEA assessment does not claim that any communities depend primarily on fishing. However, in communities such as Carradale and Campbeltown, the inshore fishing industry makes an important contribution to overall economic and social viability.</p>
NTS, p. 8 Fisheries	<p>Dispute the assessment that draft policies concerning safeguard of fishing grounds could benefit biodiversity, flora and fauna through “Potential reduction in extent of displacement to novel areas” on grounds that “it is highly unlikely that there are any novel areas where nephrops fishing could be undertaken in the Clyde”.</p> <p>“Unclear as to how a strategic approach tending to promote efficient use of harbours is likely to have any relevance in relation to safeguard of fishing grounds”</p>	SFF/CFA	<p>Comments Noted. See also comments re. RSPB response above.</p> <p>The suggested causal relationship is the other way about – policies such as FISH1 may assist in retaining long-term use of key existing fishing grounds which may in turn safeguard efficient use of traditional fishing harbours</p>
Fisheries: Summary table on p. 81 draft Plan	“accepted that a Marine Spatial Plan could have positive benefits in terms of enhanced protection of biodiversity. However given that the potential effects of the policy are both positive and negative, e.g. both FISH 2 and FISH 3	SNH	SEA assessment (detailed p. 180-186 o Environment Report) was that policies FISH 2and 3 would not have any significant impacts across the Firth as a whole as they would not

Relevant Section in draft Environment Report	Comments/Concerns	Origin	Response
	could result in increased pressure on environment, it is our view that 'yellow' is a more appropriate rating".		affect EC TAC quotas; hence summary assessment should stand.
Mitigation and Enhancement Measures ( p. 87-96, Environment Report)	"could be made a bit more robust e.g. many of the specific ...measures identified <i>focus on the application of the enhanced knowledge base to future planning and decision making</i> . While it is very important that the decision makers make decisions in the full knowledge of the impacts of the proposal on the environment, we are not sure this would be classed as mitigation. Having more data about an interest might not make a difference to decision making if [a commitment by the decision makers to avoiding, minimising or offsetting impacts] isn't there. It would be helpful if the activities proposed as mitigation measures in Table 27 could be attributed to someone or some organisation. Many of the activities relate to voluntary action. It might be useful to ascertain what the residual impacts would be if that voluntary action was not carried out"	SNH	Comments Noted for consideration in preparation of revised Plan
Mitigation measures (p. 15-16 NTS)	p.16 NTS Possible loss of tranquillity "Especially relevant to Arran"	Sally Campbell	Comments Noted
Enhancement Measures (p. 17, NTS)	With respect to Enhanced safeguard of biodiversity, fauna and of physical/morphological features:  Text states " <i>Encourage voluntary community-based approaches to management/protection of sensitive features</i> " COMMENT "clearly there has no real encouragement for this, just look at COAST's experience. 14 years of community effort. No reason to even hope this might change"  Text states " <i>encourage local residents/schools to take part in biological recording and reporting schemes.</i> " COMMENT: "Encouragement is not enough, involvement of all stakeholders in decision making processes."	Sally Campbell	The enhancement measures proposed here recognise the desirability of greater engagement and involvement by local communities in marine management and safeguard and are intended to promote this.
Monitoring (p.97-98, Environment Report)	"it would be useful to identify who will be carrying out the monitoring, over what timescale, how frequently and who will be collating all the data which is sourced from other agencies [and] what actions will be taken arising from findings from monitoring activities This may simply to be fed into the next plan."	SNH	Comments Noted, as highlighted in the introductory text to this section we recognise that monitoring aspects require additional development in the process of Plan revision.

### APPENDIX 3 USE OF SEASEARCH DATA FOR MARINE SPATIAL PLANNING

In recent years, COAST has been very active in collecting valuable information on the occurrence of marine species and habitats around Arran and more widely across the Firth of Clyde. These data have been collected as part of the UK-wide Seasearch programme co-ordinated by the Marine Conservation Society (MCS), who have provided training to members of COAST in 2003 and 2006.

During the consultation on the draft Firth of Clyde Marine Spatial Plan, COAST expressed concerns that Seasearch data had not been used by the SSMEI Clyde Pilot when preparing the draft Firth of Clyde Marine Spatial Plan.

Seasearch data, including COAST's records, were included within the *Review of Biodiversity for Marine Spatial Planning within the Firth of Clyde* project, which was undertaken by MarLIN (Marine Life Information Network) under contract to the SSMEI Clyde Pilot. This bespoke project collated existing data on intertidal and subtidal species (excluding birds) and biotopes (seabed habitats) across the Firth of Clyde and examined how such data might be applied to identification of areas of biodiversity importance for the purposes of marine spatial planning. The project report forms a technical appendix to the draft Plan and is available to download from

[http://www.clydeforum.com/ssmei/images/stories/Downloadable\\_PDFs/Review-of-Biodiversity-Report.pdf](http://www.clydeforum.com/ssmei/images/stories/Downloadable_PDFs/Review-of-Biodiversity-Report.pdf)

The initial data collation phase of the MarLIN project took place in the first quarter of 2008. At the suggestion of MCS, MarLIN contacted Howard Wood of COAST. Howard was extremely helpful and was able to supply additional Seasearch form data, contacts for other holders of potential information and his expert knowledge of the area. All Firth of Clyde Seasearch data then available were included in MarLIN's initial data compilation, which comprised over 130,000 records. As illustrated in Figure 6 of the project report, these included a high number of species records for Lamlash Bay which fed into the subsequent mapping of the known occurrence of priority species and analysis of (benthic invertebrate) species hotspots. In addition, COAST's local knowledge also contributed to Figures 15 and 16, which identify features of conservation concern.

However, while the Seasearch species records were utilised in the biodiversity review, it did not prove possible to use Seasearch records for habitat (biotope) mapping and analysis. Biotope mapping is a valuable precursor to the selection of protected sites within the marine environment and to marine spatial planning more generally. Many of the Seasearch forms for the Clyde were either at the Observation level or had utilised the original version of the Seasearch Survey level form and it did not prove possible to ascribe European Nature Information System (EUNIS) biotopes to these data sets.

The EUNIS system was developed to standardise the description of habitats across Europe and, as such, underpins marine habitat mapping programmes and projects throughout the EU. MarLIN adopted the EUNIS system for classification of habitats (biotopes) in the Clyde biodiversity review both to conform to national and international seabed mapping standards and to ensure that like was

compared with like, thus avoiding any danger of double badging of the same habitats and consequent incorrect assessment of relative biotope richness, which was a key element of their hotspots analyses.

EUNIS characterises habitats, or biotopes as being unique combinations of non-living environmental variables and associated biological communities. It requires information on the physiographic setting of the site (e.g. energy level, salinity, wave exposure, tidal streams, substratum, zone (i.e. circalittoral) and depth band). Some of this information is provided for historic Seasearch surveys, but details on energy level, salinity, wave exposure and tidal streams are not and this is why it is not currently possible to accurately match Seasearch habitat categories to the EUNIS classification system.

MarLIN initially discussed the use of Seasearch data with Calum Duncan of MCS in Edinburgh in February 2008. Calum advised MarLIN of ongoing research that MCS was conducting on the potential for extracting biotope information from Seasearch data, but advised that the Seasearch data then available were not suitable for biotope mapping. Chris Wood of Seasearch subsequently (October 2008) confirmed that the historic data were not suitable for use in biotope mapping.

MCS were already aware of the wider issues arising from the difficulties in translating Seasearch data to standard biotope codes and have been working to resolve these. A new Survey form has been developed, along with guidance notes, so that the standard UK habitat classification (MNCR 04.05), which can in turn be matched to EUNIS biotope codes, can now be allocated to Seasearch Survey level data (although not to Observation level data).

Since the publication of their report for the Firth of Clyde, and in recognition of the underlying importance to future marine planning of making maximum possible use of Seasearch data, MarLIN have made further suggestions for making historic Seasearch data (i.e. those pre-dating the change in survey methods) compatible with EUNIS. This would involve the development of methodologies based on additional consultation with local experts to provide the essential hydrographic contextual information for each site. With this additional information it may then be possible to assign EUNIS biotopes without further surveys and utilise this valuable information resource (although some ground-truthing to evaluate confidence would also be required). In addition, many of the proposals within the Action Plan in the draft Firth of Clyde Marine Spatial Plan focus on filling key data gaps to enable future refinement of policies and enhanced protection of sensitive priority species and habitats.

While the problems which arose with respect to use of Seasearch data for the first draft Firth of Clyde Marine Spatial Plan are of obvious concern to those who carried out the surveys, the identification of this issue within the context of the Clyde Pilot highlights the value of the SSMEI pilot projects as a precursor to the development of statutory marine planning system for Scotland. Identification of data issues at this stage provides an opportunity for these to be resolved before the introduction of statutory planning under a Marine (Scotland) Act.