

Wildlife and Countryside Link response to Marine Management Organisation online survey:

Marine Planning Iteration 1 Engagement (NE/NW/SE/SW)

March 2017

Wildlife and Countryside Link (Link) brings together 46 environment and animal protection organisations to advocate for the conservation and protection of wildlife, countryside and the marine environment.

Our members practice and advocate environmentally sensitive land management, and encourage respect for and enjoyment of natural landscapes and features, the historic and marine environment and biodiversity. Taken together we have the support of over eight million people in the UK and manage over 750,000 hectares of land.

This response is supported by the following five Link members:

- WWF UK
- Marine Conservation Society (MCS)
- Wildfowl and Wetlands Trust (WWT)
- Whale and Dolphin Conservation (WDC)
- The Wildlife Trusts
- ORCA
- RSPB
- ZSL

N.B. This response was submitted as an online questionnaire, not in this format.

Survey responses

Do the issues presented adequately represent the opportunities and challenges for your plan area?

As a coalition of national environmental organisations, we are interested in all plan areas.

We believe that the issues presented adequately cover the opportunities and challenges across the plan areas.

We believe the issues represent those in the plan areas, many of which are site-specific. They highlight that there are many issues requiring a plan-specific policy response, and that simply cutting and pasting general policies from the East and South England Marine Plans may, in many cases, be inappropriate. It is beyond the scope of our organisations to re-examine the exhaustive table of issues provided by the MMO, but we would refer you to our feedback through the sustainability appraisal advisory group and engagement at regional workshops, which should also be included where appropriate.

It is important that the plans consider protecting the environment and the protected area network as an opportunity, rather than a challenge. Moreover, they should embrace the economic benefits that a healthy marine environment can deliver, along with increasing resilience to climate change and the provision of vital ecosystem services. Some of the issues and challenges presented come across as if protected areas and the environment are the problem to be overcome, rather than as though they are part of the toolkit for successful marine planning.

Please identify any issues with supporting evidence that have not been included in the issues database.

No extra issues have been identified at this stage. It is beyond the scope of our organisations to re-suggest extra issues with supporting evidence at this stage, but our feedback through the sustainability appraisal advisory group and through engagement at regional workshops should be included where appropriate. We would welcome the opportunity to engage at these stages.

Does the policy response adequately address the issues for this plan area?

No.

The policy response does not adequately address the issues in any plan area.

As the stakeholder workshops have identified, there are many issues for which the common policy response has been inadequate. In many cases, this view was shared by stakeholders of all sectors for two reasons; either:

- the policy is too vague to address the specific issue being raised; or,
- the policy is not relevant, or even contradicts the issue (or would lead to the issue getting worse).

One striking example of the latter is for the South East Marine Plan, where issue 686 states that:

“The largest no-take zone in England (Medway) will support fish nursery area enhancement benefiting both ecology and economy...”

However, the suggested policy response S-FISH-2 states that:

“Proposals that may have significant adverse impacts on access to, or within, sustainable fishing or aquaculture sites must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate significant adverse impacts d) if it is not possible to mitigate the significant adverse impacts, proposals should state the case for proceeding.”

This policy would encourage fishing pressure on the NTZ and does not highlight any of the reasons for protecting the habitat.

Secondly, where many issues across the plan areas highlight that aspects (or specific geographical parts) of the marine environment are degraded and/or in need of recovery for both their biodiversity value and for the ecosystem services they provide, all common policy responses largely seek to prevent further degradation through the standard stepwise hierarchical policy framework of “avoid-minimise-mitigate”. More policies should address the issue of a degraded marine environment by being more positive, in terms of seeking enhancement.

The policy responses which *do* most clearly address the issues are in relation to safe shipping, which require a minimum distance or space underneath or adjacent to recognised shipping lanes that have a transboundary element, such as S-PS-2.

Although there is a role for common policies to play, for example around climate change, common policies are generally inadequate given site-specific complexities. In addition, it seems somewhat premature to seek to apply common policies to issues before the vision of the plan areas has been developed. Future iterations of the plans will be required to develop a set of specific policies which better address the specific issues for each plan area, and should be tailored to achieving the vision and objectives of each plan. These policies should be spatially specific and, where encouraging future activities, based on environmental vulnerabilities as well as other aspects.

Please suggest an alternative policy response.

We do not have the resources to suggest alternative policy responses at this stage, but it is worth noting that site-specific policies are likely to be considered in future iteration discussions. We look forward to playing a part in developing those.

It should be noted that, while we have outlined our general concern that high-level policies do not address many of the issues highlighted by the MMO, this is not necessarily a criticism of, or comment on, the policies themselves. Indeed, we continue to welcome policies from the South England Marine Plans that seek to safeguard and expand important coastal habitats,

reduce disturbance on mobile species, improve water quality, reduce marine litter and noise, and ensure the future inclusion of priority habitats and species into the MPA network. Our collective feedback from previous engagement periods on these policies still applies to each policy, as appropriate.

Having viewed and considered the digital plan format could you use these in your current role?

Yes.

We believe that the digital plan format is a welcome addition to the ways in which people can view the Marine Plans, and we would like to see this developed further. Increasingly, digital plans that allow for spatial overlay of policies will help end users to consider which plan policies interact over space and time. To this end, we note that the current format does not yet allow for this (and is currently a set of links to the MMO website), but we hope this could be encouraged in future and based on the Marine Information System.

It will be important for some people to have a single paper copy of the plan to hand, for reference, which includes the important narrative text within the technical annex. This information is critical for defining important terms in the plan policies, and any digital plan format must ensure that this narrative detail is not overlooked by end users.

One further suggestion would be to ensure that weblinks open in a new tab so that the digital plan is always available.

Considering your answer above what would make digital plans easier to use?

One suggestion would be to have a whole side of the digital plan for an embedded 'zoomable' version of the Marine Information System.

Overall, how satisfied are you with our online consultation tool?

Satisfied.

The tool allows for targeted questions and answers but risks missing important overall comments about the plans and their processes, which may not neatly fit into specific questions. The tool should enable this by including questions at the beginning and end, relating to offering overall comments on the progress of plans at this stage, as well as other comments.