

Marine Planning Team
Marine Management Organisation
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21 February 2011

Dear MMO Marine Planning Team,

RE: East Inshore & East Offshore Marine Plan Areas - Draft Statement of Public Participation

Wildlife and Countryside Link (Link) brings together over 30 of the UK's leading voluntary organisations united by their common interest in the conservation and enjoyment of wildlife, the countryside and the marine environment. Taken together our members have the support of over 8 million people in the UK.

Link's Marine Working Group is a long-time supporter of and campaigner for a new strategic, forward-looking marine planning system. We therefore welcome this consultation on the Draft Statement of Public Participation (SPP) for the East Inshore and Offshore Marine Plan Areas. In particular, we support the development of one SPP for both plan areas, and the decision to engage stakeholders and develop the marine plans for both areas simultaneously.

Link would however like to raise a number of concerns with respect to the Draft SPP:

- The SPP refers in various places to balancing the needs of current and future generations, as well as balancing economic, social and environmental needs. Link believes that the SPP needs to better reflect the role and benefits of marine planning as laid out in Defra's 'Marine Planning System for England' July 2010 consultation document. In that document, Defra make it clear that the intention is for the marine plans to integrate environmental, social and economic considerations through the plan-making process rather than balancing them.
- Link notes with concern that environmental NGOs are not mentioned in the list of key stakeholder groups (pg.7-8). We see this as a serious omission. Environmental NGOs have a great deal of information and expertise to bring to the marine planning process, including experience of planning systems on land



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"Bringing voluntary organisations in the UK together to protect and enhance wildlife and landscape, and to further the quiet enjoyment and appreciation of the countryside"

Chair: Paul de Zylva, Director: Jodie Bettis

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and at the coast, as well as knowledge of marine ecosystems and their conservation. In addition, many of the Link member organisations are active at the coast, either in the role of landowner or land manager.

- Overall, the SPP says very little on the environmental and conservation aspects of the marine plan areas. Instead, giving the impression that economic needs provide the primary rationale for marine planning in these areas. Link is of the view that the role of marine planning (as well as being the MMO's duty) is to achieve sustainable development in the marine area, which includes ensuring that the ability of the marine environment to continue to deliver crucial ecosystem goods and services is not compromised.
- Link is of the opinion that more detailed information is needed for the 1 year period of scoping. The lack of any detail over this period does not help stakeholders understand how and when they will be contacted by the MMO, or *vice versa*, or when stakeholder events will take place, etc.

We hope that these concerns will be taken on board as the SPP for the East Inshore and Offshore Marine Plan Areas is finalised. If you have any queries regarding the points we have raised please contact Joanna Fisher at Link on 020 7820 8600 or joanna@wcl.org.uk.

Yours sincerely



Joan Edwards
Chair, Wildlife and Countryside Link Marine Working Group

On behalf of the following organisations:

- Buglife – The Invertebrate Conservation Trust
- Marine Conservation Society
- Royal Society for the Protection of Birds
- The Wildlife Trusts
- WWF - UK