

Guiding principles for Marine Spatial Planning

- **The climate and biodiversity crises are indivisible.** It will not be possible to stay within 1.5°C of global warming without addressing the biodiversity crisis, nor will it be possible to halt the decline of nature without preventing dangerous climate change.
- In November 2022, the UK Government signed the Kunming-Montreal Global Biodiversity Framework. Target 1 states that Governments will “ensure that all areas are under participatory, integrated and biodiversity inclusive spatial planning and/or effective management processes addressing land- and sea-use change, to bring the loss of areas of high biodiversity importance... close to zero by 2030.”
- Along with existing pressures of unsustainable industrial fishing in UK waters, the UK is now entering a new phase of marine industrialisation through large scale development of offshore wind, alongside developments such as telecoms cables and proposals for CO₂ storage. The misguided commitment to grant hundreds of new oil and gas licences will add unsustainable pressure to the offshore environment, as well as contributing to greenhouse gas emissions and ongoing dependence on fossil fuels. Approval of oil and gas licenses within designated MPAs and SACs further erodes commitments to restore biodiversity.
- Preventing climate change and restoring biodiversity must be the highest priorities in the planning of UK seas.
- **Marine plans are essential** for managing conflicts emerging from the growing number of activities at sea, **yet current plans are obsolete**;¹ they will not enable the timely construction of 50GW of offshore wind capacity by 2030 in a manner compatible with legally-binding targets for nature’s recovery. Nor do they have a spatial element to guide where development should most sustainably be located.
- **Major elements of the fisheries sector have been operating unsustainably** and Government has not set out a viable strategy for change. In 2022, 51 of 79 Total Allowable Catches were inconsistent with ICES’ scientific advice on sustainable fishing limits and 7,000 hours of fishing activity used destructive bottom-trawling techniques in Marine Protected Areas.² Government proposals to restrict fishing in MPAs continue to be limited in scope, protecting only a fraction of features, rather than whole sites, leaving MPAs largely unprotected.
- As unprecedented development ramps up at sea, **a failing planning system risks an excess of overall activity.** This will harm the UK’s already depleted seas, pushing the marine environment beyond its limit. **Overall, the current marine planning system is failing to embed the Government’s legally-binding targets on both climate³ and nature.⁴**

¹ [An assessment of East Marine Plans](#) found “legislative and policy changes... means that their intended outcomes are no longer aligned to the UK’s national priorities... the MMO recommends that the plans be replaced”.

² [Assessing the sustainability of fisheries catch limits](#) negotiated by the UK for 2020 to 2022, January 2022

³ Net-zero greenhouse gas emissions by 2050

⁴ Halting the decline in wildlife population by 2030; at least 70% of protected features in MPAs to be in a favourable condition by 31 December 2042. Government is also committed to achieving Good Environmental Status for English seas across 15 target indicators.

Reforming marine planning

- Marine Plans should include (1) priorities for use of the sea; (2) spatial strategies to allocate space for priority activities; and (3) plans to reduce pressures from all activities.
- **England's Marine Plans must be revised to set nature and climate as the priorities for use of the sea.** Climate and nature should be set at the heart of marine policy and spatial planning, following an ecosystem-based approach. Marine plans must ensure that areas for nature are effectively protected and that the **cumulative environmental impacts** of increasing demands on the sea are addressed to enable nature to recover while helping to tackle climate change.
- **Government should create a spatial plan outlining where and when activities could take place, with a hierarchy of priority that makes space for 30x30 and decarbonisation first**, minimising trade-offs and maximising opportunities from co-existence and co-location, only then allocating remaining space for other activities (although new oil and gas developments should be ruled out in all circumstances, on climate, cost and energy security grounds). This will require undertaking detailed scenario planning of all activities planned up to 2050, to explain the implications of different sea space management plans. This will help ensure that all decisions are evidence-based and consider future needs.⁵ Scenario planning should determine if we currently have enough sea space to deliver ambitions for each sector and nature, and identify trade-offs to be managed by the government proactively and responsibly in the event of competing spatial priorities for climate and nature.
- Further, marine planning should adopt **a more coordinated approach**, working across Governments to ensure that activities are considered across the whole of the UK's seas.
- All spatial planning is a form of prioritisation and all prioritisation requires choices between competing demands for space. At sea, there needs to be a clear hierarchy set out in decision making, ensuring that new principles guiding marine planning enable the restoration of nature, as well as reaching net zero.
- Better data and a holistic approach would improve marine planning. **Greater understanding and mapping of blue carbon stores** should inform updated marine plans which can ensure that the most valuable ecosystems for marine carbon capture and storage are restored and protected.
- Better decisions would be made if full consideration were given to the full value of the services MPAs could provide society, including carbon storage, removal of pollutants, nutrient cycling and recreational opportunities. **If protected from all damaging activities, the overall net benefit could amount to between £2.57 billion and £3.5 billion** over a 20-year period.⁶

⁵ The Crown Estate have announced a new project to map future scenarios for existing and future demands on the seabed out to 2050. This project, when completed, can help inform Government policy following consultation with stakeholders <https://www.thecrownestate.co.uk/en-gb/media-and-insights/news/2023-the-crown-estate-to-digitally-map-scenarios-to-inform-co-ordinated-approach-to-future-seabed-use/>

⁶ https://s3.eu-west-1.amazonaws.com/media.mcsuk.org/documents/Summary_report_-_Valuing_the_improvement_of_ecosystem_services.pdf

Planning for nature & climate: making space for nature

- **To halt the decline of biodiversity, 30% of UK seas must be strictly secured for nature in fully or highly protected Marine Protected Areas (MPAs) by 2030, including a ban on damaging industrial fisheries in all benthic MPAs.**⁷ MPAs must be avoided when planning how to use sea space to allow the Government's legally-binding MPA targets to be met.⁸ Marine plans must be updated to ensure the avoidance or reduction of industrial developments and the most damaging activities in all MPAs, with all harmful activities restricted in Highly Protected Marine Areas covering a minimum of 10% of UK waters. Plans should also support the achievement of Good Environmental Status at sea, taking an ecosystem approach.
- The **mitigation hierarchy** establishes clear principles for addressing impacts from development, with a focus on avoiding harm in the first instance. The planning process, both at a strategic (marine plan level) and project level must ensure it delivers upon **the mitigation hierarchy**, focussing on avoidance and minimising impact to arrive at a well-evidenced, sustainable solution. The strategic level is particularly important to manage overall pressures and ensure cumulative impacts are within ecological tolerance.
- Compensation is not an acceptable substitute for irreplaceable habitats lost in construction. For other habitats and species, **the mitigation hierarchy should be followed with compensation as a very last resort**. Compensation may well best be delivered strategically rather than project by project, and as far as possible should be delivered close to the damaged site. It should not undermine the coherence of the UK MPA network; for example the North Sea cannot lose protections with compensation implemented in Welsh seas. It should also ensure no net loss in the extent, connectivity and coherence of the network.
- There is an urgent requirement for Marine **Net Gain** for all activities and developments at sea to ensure they result in enhancement and restoration of biodiversity. Marine Net Gain must not negatively impact Marine Protected Area features.

⁷ As defined against IUCN criteria: <https://www.protectedplanet.net/en/resources/mpa-guide>

⁸ For example, in the Inner Dowsing, Race Bank and North Ridge SAC, Natural England have found that offshore windfarm infrastructure, including hard substrata in the form of rock protection for cabling protection and scour prevention has "resulted in a cumulative change/loss of approximately 63,089.82 m² of Annex I Sandbank habitat and its sub-features over the 25-year lifespan of the project."

Planning for nature & climate: renewable energy needs

- **Nature recovery and climate protection must be prioritised when planning activity in UK seas.** The protection of nature should be a consideration for all activities, including its potential to store and sequester carbon. Alongside space for nature, sea space should also be prioritised for 50GW of renewable energy capacity by 2030 (rising to 140GW by 2050) and grid infrastructure needed to decarbonise the UK economy and meet net zero targets in a way that is compatible with nature-restoration.
- **Alongside nature-protection, spatial planning must identify the most suitable areas of the UK's Exclusive Economic Zone for developments necessary for net zero, such as offshore wind.** These should be prioritised before all other activities, such as sustainable fisheries. Activities which damage the marine environment must be reduced as far as possible and avoid MPAs altogether, alongside other highly sensitive areas for marine life, including irreplaceable habitats.
- **The current system fails to consider the marine environment as an integrated system, relying too heavily on individual planning applications, rather than a strategic approach.** This leaves major system-level issues to be considered as part of individual applications, which is inefficient and creates delays and uncertainty for all parties.
- **Strategic planning of specific areas for development** would provide greater clarity and enable full public consultation from an early stage in the process, giving a degree of public acceptability to schemes and limiting the scope of conflict at application stage. This could therefore potentially **speed up the consenting process while protecting our fragile marine environment.**
- Efforts to streamline the EIA process should not be at the expense of ensuring robust environmental protections and reduction of harmful impacts.
- **Cables from offshore windfarms** should be planned in a more coordinated spatial way, minimising impacts through the creation of cable corridors to reduce the area of seabed covered in cables and associated infrastructure along coastlines. Cable corridors would provide a secure supply of energy to the UK grid through the management of damaging activities, with the twin benefit of creating nature recovery corridors where bottom towed fishing gears are prohibited.
- The implementation of **innovative environmental standards and mitigation measures** should be delivered throughout the lifetime of all activities at sea, including the construction, operation and decommissioning of developments. This will reduce environmental harm and support recovery. It will also reduce consenting risk and delay by reducing the need for compensation. The development of marine plans should integrate standards which drive industry to reduce environmental impacts to ensure sustainable development. This can also be assisted through the creation of **best practice mitigation measures** with guidance from the conservation community.
- Investment in **better data and monitoring** would support effective planning at sea. Further investment to understand the full cumulative and lifecycle environmental impacts of **floating offshore wind** is urgently required and would also increase confidence in this technology. All data and evidence must be accessible and stored in a transparent way for all to use.
- While offshore renewables are vital, reducing demand for energy is also essential (in particular through home insulation and heat pumps, alongside electrification and expansion of public transport), as is ensuring a balanced mix of energy generation methods to prevent overreliance on one technology and disproportionate impacts on specific environments. Significant additional government investment is needed to support the roll-out of these solutions.

Planning for other activities

- Other activities should be considered if they are compatible with nature-recovery and climate change mitigation goals.
- **Strictly no new offshore oil and gas exploration or extraction at sea.** As priorities are determined for the marine environment, one clear red line is that no new development of offshore oil and gas should be permitted anywhere in the UK's EEZ. This will reduce harm to marine life from noise and pollution, and ensure that the UK shows international leadership on the climate crisis.
- **Fisheries should be required to operate at sustainable levels, accounting for ecosystem needs,** with quotas set in line with scientific advice, with bycatch minimised and where possible eliminated. As the MMO acts to restrict damaging fishing activity in MPAs, spatial planning must ensure that displacement does not result in unsustainable pressures on other sensitive species or habitats. Damaging industrial fisheries should be banned. The Government should invest in a just transition to support those affected by the move away from damaging industrial fishing.
- As recommended by the OEP, fisheries should be incorporated into an **Environmental Impact Assessment (EIA) regime**, requiring new and existing fishing operations to demonstrate that they would not have a significant effect on the marine environment and marine species. These assessments should be used to guide marine planning decisions, restricting fishing activities when assessed to be damaging.
- Funding from **Marine Net Gain** could support environmentally beneficial fisheries interventions.
- Innovative technologies should be embraced across all marine sectors. Schemes such as **Remote Electronic Monitoring (REM) with cameras** on fishing vessels should be rolled out to help reduce sensitive species bycatch and discards and to deliver fully documented fisheries.
- Where specific developments/activities are prioritised over others, **a just transition plan for those affected should be developed.** For example, where fisheries cannot operate sustainably, support should be provided to enable a just transition for affected fishers. This should include assistance in adopting more sustainable fishing methods or support to enter other industries.

This paper has been produced by Wildlife and Countryside Link (Link), the largest nature coalition in England, bringing together 80 organisations to use their joint voice to protect the natural world.

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