

By Email only to
marineplanning@wales.gsi.gov.uk

10th November 2014

Dear Sir or Madam,

**Natural Resources Wales response to Welsh Government consultation on
'Developing the Welsh Marine Plan: A draft Scope, Draft Vision and related
Objectives'**

The purpose of Natural Resources Wales is to ensure that the environment and natural resources of Wales are sustainably maintained, sustainably used and sustainably enhanced, now and in the future.

The marine environment is a strategic national asset for Wales. It makes up almost half of Wales' territorial area and delivers important benefits to society, including jobs, food and a resource for recreation and relaxation. A study undertaken in 2006¹ indicated that the marine and coastal environment supported 92,600 jobs and contributed £2.5 billion to GDP.

No community in Wales is further than 50 miles from the sea, with around 60% of the population living and working at the coast. Therefore there are strong social and cultural ties between the people of Wales and the marine and coastal environment, with the history and literary traditions of Wales intertwined with reference to the sea. The coast is an important area for tourism and recreational activity, but also a focus for the protection of people and property with growing pressure on this area as sea levels rise due to climate change.

The variety and quality of the marine and coastal ecosystems of Wales is recognised through a large number of conservation and heritage designations. Around 70% of the coastline is designated under European legislation for the importance and quality of its

¹ National Trust Publication 'Valuing our environment: Economic impact of the Coastal and Marine Environment of Wales' (2006).

marine life, from rocky reefs to Bottle Nose Dolphins. Pembrokeshire Coast National Park is the only National Park in the UK designated primarily because of its coast line. This rich natural and cultural heritage is the basis of a thriving tourism industry, supporting a significant number of jobs in local communities around our coastline.

Healthy and resilient marine ecosystems are essential in underpinning the socio-economic and cultural benefits we can derive from the marine environment, particularly for key sectors such as fisheries, aquaculture and tourism. Human activity in the marine environment such as port development, aggregate extraction, fisheries and marine renewable energy continues to grow; enabling this growth, sustainably, will be key to the delivery of Wales' aspirations under the Well Being and Future Generations Bill. It is therefore increasingly important that we take a plan-led approach to the management of the marine area to enable Wales to optimise the economic, social, and environmental benefits that can be accrued through the sustainable management of marine resources.

We therefore strongly welcome the work underway to put in place the first Welsh National Marine Plan (WNMP). The development of a marine planning system across the UK is the culmination of many years of work from Government and different stakeholders, including Natural Resources Wales, who have emphasised the need for an integrated and plan-led system of management for the marine area. We recognise that the timeframe for the development of this first marine plan for Wales is challenging. However, we believe that the plan and planning process can be reviewed, refined and improved over time as our understanding and experience grows, to positively impact on the management of our marine resources within the 20 year timeframe of the Vision set out in this consultation.

The rest of this letter sets out our response to Questions 1-3 of the current consultation. With respect to our statutory role as consultee under the Strategic Assessment of Plans and Programmes (Wales) Regulations 2004, this will be discharged by a functionally separate section of the organisation, our Strategic Assessment Unit, who will respond to Q4 and 5 of this consultation relating to the scoping of the Sustainability Appraisal. We have summarised some key issues at the beginning of this response, and provide more detailed response to the individual consultation questions after this.

Summary of key issues

- Natural Resources Wales welcomes the commitment to prepare the Wales National Marine Plan by 2015 and the associated process that has been set up to deliver it. We acknowledge that this is the start of an iterative process and that subsequent plans will evolve over time as the process matures and our understanding of the marine area improves.

- We emphasise that the key benefits to be accrued through the marine planning process will be through policy integration, both within Welsh Government, with Westminster, and regionally/locally with local government. This should include the setting of integrated and measurable objectives and outcomes for the WNMP.
- We see the marine planning process, which is required to take an Ecosystem Approach, as the key mechanism for delivering Natural Resource Management Policy within the Welsh marine area. Recognising this, we also suggest that the marine planning process could usefully start to identify sub-national marine areas for management. This could be based on work currently underway to identify seascape character areas and the regional management of the Marine Protected Area network.
- A key challenge for the management of marine resources is the limited available evidence and information about the marine environment, particularly in comparison to the terrestrial area. We therefore agree that a key role of the planning process will be to identify and prioritise evidence requirements for the delivery of marine plan policies. This evidence base would form the basis of the marine elements of State of Natural Resource Reporting (SoNaRR) under the Environment Bill.
- A critical issue for the marine planning process to address will be the integration between marine and terrestrial planning and management which, if achieved effectively will deliver Integrated Coastal Zone Management (ICZM). We would hope to see this better identified within the vision for the marine plan, and also reflected in plan policy and in associated guidance, in conjunction with work being undertaken through the Planning (Wales) Bill.
- We welcome the strong reference to local communities within the consultation document. Engaging with stakeholders, be they those communities who live by and use the sea, or multi-national companies who are key to the exploitation of key resources such as offshore renewable energy, will be critical in enabling buy-in to plan policies and ensuring the long term success of the planning process.

Full consultation response

Q 1 Do you have any comments on the proposed vision for the WNMP?

Natural Resources Wales welcome this vision for the integrated planning and management of the Welsh marine area. As set out, it reflects key Government targets and priorities, such as those set out in the Future Generations Bill and Programme for Government. We are pleased to see reference to sound management of natural resources and the importance of a healthy marine ecosystem set out within this vision since this will be at the heart of ensuring the sustainable use of the marine environment.

The vision should set the scene for integrated management of the marine environment, guiding all stakeholders to work towards a set of common goals for Welsh seas. However, the vision as currently expressed comes across as a series of unrelated and even potentially conflicting goals for the marine area. The UK vision for 'Clean, healthy, safe, productive, and biologically diverse oceans and seas' is adopted in Wales and also familiar to UK stakeholders. It is short and engaging and we propose that it could usefully form the starting point for a more detailed Welsh vision for our marine area. We suggest that some further thought be given to making the vision shorter, more integrated and ensuring that it better reflects current priorities within the marine context and more clearly explains the WNMP's role in the delivery of shared outcomes. For example, whilst it is an important goal for Wales to have communities with a vibrant culture and thriving Welsh language, the vision does not reflect the marine plan's role in this.

We would also like to see the importance of supporting healthy and resilient marine ecosystems further strengthened within this vision. It is the role of Natural Resources Wales to ensure that the environment and the natural resources of Wales are sustainably used, maintained and enhanced. We see the WNMP as a key tool for delivering our purpose and wish to see this reflected in the vision. The health of the marine environment is critical to the long term productivity and growth for some of the key growth sectors in Wales, including tourism, fisheries and aquaculture. A healthy marine environment should also play an important role in ensuring that local communities are more prosperous, resilient, healthy and cohesive. The vision as currently set out does not emphasise these links and thus seems to downplay the overall role of the environment in underpinning the social, economic and cultural goals in relation to Wales' marine area.

We note that the use of the Ecosystem Approach to underpin marine planning is not mentioned specifically in this vision. We understand that the aim of the Natural Resources Management Policy set out in the emerging Environment Bill is to embed an Ecosystem Approach into management. We anticipate that scrutiny will be given to the Wales National

Marine Plan in relation to this issue, because of the commitment within the UK Marine Policy Statement that marine plans must be based on an Ecosystem Approach. Application of the Ecosystem Approach is also an important element of the delivery of the Marine Strategy Framework Directive. It may therefore be helpful to make this link within the Vision itself more clearly, as this is an important opportunity to clarify the delivery of the current Natural Resources Policy within the marine area, particularly for wider UK stakeholders who may be less familiar with the detail of current Wales policy on environmental management.

We welcome reference to the importance of engaging communities in delivering this vision, as this is a component part of applying an Ecosystem Approach. This is a particularly pertinent issue in the marine environment, which can be out of sight and out of mind despite the important role it plays in the lives of local communities and the wider Welsh and UK population. It would be useful if the vision could be clearer about how stakeholders are expected to be involved in delivery of the management of the marine environment. The benefits of meaningful engagement with stakeholders is that there is 'buy in' and understanding about the role of individuals in the stewardship of the seas. Involving stakeholders can encourage wider thinking and inclusive discussion about how we can optimise the social, environmental and economic opportunities from the marine environment. There may be opportunities for 'citizen science' whereby sea users and other stakeholders can support the planning process through the collection of relevant data, for example. We also note that the vision particularly emphasises the role of 'local communities'. Whilst clearly important, it is of note that the Welsh marine area is also of interest to large multinational industries looking to develop their business as well as many thousands of visitors and recreational users from within and beyond Wales every year. A key challenge for the planning process will be to engage all stakeholders, from the local community to the international level, and develop integrated objectives that can deliver for all these interests.

Emphasising the importance of improving people's understanding of our seas is also important. Marine ecosystems have been significantly impacted by man's activities over the past 100 years, and integrated marine planning, supporting the application of the Marine Strategy Framework Directive, should be an important tool in restoring the health and resilience of the marine environment of Wales. Ensuring that we have the right evidence to support the decisions that we face on the sustainable use of the marine area is a considerable challenge. A key focus of the marine planning process must be to identify priority evidence gaps and ensure these are filled through appropriate mechanisms. It will also be important to set measurable outcomes within the planning period against which the success of the plan can be measured. The Strategic Scoping Exercise that has been developed to inform the planning process identifies a number of key environmental issues,

such as the poor conservation status of some Marine Protected Areas features within our waters, against which we would wish to see positive progress within the next 20 years.

A key opportunity for marine planning is to offer more certainty over the level of priority given to different activities and interests in the marine area. This vision does not currently provide for any specific direction of travel. Whilst we appreciate the difficulty in being more spatially explicit, particularly in terms of providing more certainty within the development of the first plan, the Vision could emphasise the ambition to do this within its 20 year time frame. We believe that a key purpose of planning is to offer better clarity and certainty over the appropriate spatial use of the Welsh marine area, ensuring the right activity in the right place, and that this goal should therefore be better reflected in the vision.

In summary, we believe the vision could be enhanced by

- Beginning with the UK Vision and elaborating on this in the Welsh context
- Better emphasising the critical role of a healthy marine environment in underpinning wider socio-economic well-being, taking an Ecosystem Approach
- Clarifying the specific role of the marine plan in delivering wider Government objectives
- Confirming the ambition to develop a plan-lead system of management that supports decision making to optimise social, environmental and economic benefits
- Identifying the ambition to increase the spatial prescription of the plan and plan policies over time where possible.

Q2 By successfully implementing our vision, what will the Welsh Marine Planning Region look like in practice in 20 years time?

We have identified a number of key elements to the planning process that we would expect to be substantively in place and delivering within the 20 year timeframe of this vision:

1) Plan led decision-making for the marine environment

We will have achieved plan led decision making for the marine environment, with more clarity and certainty for decision makers and sea users about the appropriate use of marine space, through applying an Ecosystem Approach to the development of marine plans. Whilst the first iterations of the plan are likely to be strategic and high level in nature, we would expect that over time, and with an improved evidence base, plans will become more spatially prescriptive and explicit to provide the certainty that users and decision-makers will need. We would expect that within the 20 year period of the vision Natural Resources Wales' role in issuing marine licenses will be strongly guided by the marine

plan and both users and decision makers will use the plan as a basis for developing project ideas and the associated decision-making processes.

2) Integration of environmental, social and economic objectives

We will be making the most of the environmental, economic and social opportunities from the marine area in an integrated way that optimises the potential benefits to all of these interests. It will be standard practice to ensure that in the development of any project or policy for the marine environment, at a strategic or local level, full consideration is given to optimising all benefits (be they social, environmental or economic) that can be built in and delivered through the work, thereby promoting 'win-wins'. For example, in developing the MPA network, consideration should be given to any associated social or economic benefits that could be delivered (for example through adding value to local tourism initiatives). Similarly, in developing offshore structures, such as windfarms, consideration could be given to opportunities for co-locating with the aquaculture industry or promotion of angling activities where structures act as an artificial reef.

3) Improved, fit-for-purpose, evidence base

The planning process should provide an overarching framework for developing the evidence base relating to sea use, identifying gaps in knowledge that hamper the ability to plan for, and make decisions about, different uses. Within 20 years we will have significantly improved this evidence base, to enable us to achieve the best spatial use of the marine environment, ensuring that the right activities happen in the right place. The environmental limits of the marine environment to different uses, and the combined effects of these uses, is better assessed and understood, such that we are better able to manage Welsh marine ecosystems within the limits of their functioning.

We would anticipate that the planning process should both inform, and be informed by, the State of Natural Resource Reporting process (SoNaRR) proposed within the Environment Bill. We are currently supporting Welsh Government in the development of a Strategic Scoping Exercise that brings together the evidence base for the marine planning process and suggest that this forms the key 'marine' element of SoNaRR in the future.

4) Supporting Integrated Coastal (Zone) Management

Appropriate alignment of the terrestrial and marine planning systems will have enabled improved management of the land-sea interface. Activities on land, such as agricultural discharge into water courses, have a significant impact on the marine environment. Similarly, activities at sea such as the construction of offshore energy infrastructure, require routes to bring this energy onshore to meet the national grid and supply communities. The WNMP will have a role in facilitating integrated planning and decision making at the coast, reflecting the important relationship between land and sea.

This is currently a time of rapid policy development and change in Wales, with the development of the Future Generations Bill, Environment Bill, Planning (Wales) Bill along with the first marine plan. This legislation will come together spatially at the coast and so it will be important to ensure join up between them to reduce the potential for conflict and confusion at the coastal zone, and promote decision making that fully takes into account the interactions between land and sea. In particular we suggest that guidance for terrestrial planners on the WNMP will help to ensure that decisions made on land are compatible with the objectives we have for the marine area.

The marine planning process is one opportunity to clarify the relationship to different but complementary policy processes currently being developed in Wales. Critically, we would view the WNMP as the primary mechanism for developing and delivering Natural Resource Management Policy within the marine area. It will also be one of the tools that supports the delivery of Integrated Coastal Zone Management, supported by the terrestrial planning system and in particular the National Development Framework proposed through the Planning (Wales) Bill.

5) Healthy and more resilient marine ecosystems

We will have completed the creation of an ecologically coherent and well managed network of Marine Protected Areas within the marine plan area, with the marine planning process supporting the effective management of this network and informing site selection where possible. Marine Plan process and policies will also underpin the achievement of Good Environmental Status under the Marine Strategy Framework Directive (MSFD).

We will have more experience and understanding of how to restore degraded marine ecosystems, and practical projects will be in place to actively recover and improve degraded areas, in line with our commitments under WFD, MSFD, Aichi, Habitats and Birds Directives. Such projects will be delivering knock on benefits to the wider environment, society and the economy.

6) Healthy and more resilient communities

The important role of coastal habitats such as salt marsh and sand dunes in providing both mitigation and resilience to climate change, and the associated benefits to society, will be fully recognised and be an important consideration in managing the coastline.

We will have a better understanding of the relationship between human well-being and the marine environment, for example through leisure and recreation activities, and will be taking forward work to ensure that such benefits are maximised. More people will value the marine environment for the recreational opportunities it provides and the wildlife it contains, and will take action to reduce the impacts of their activities on the environment and on other's enjoyment of this resource.

Q3 Have we included all the headings/sections needed in your view? Please provide us with the details of any additional you would like to suggest.

We welcome this early overview of the scope and content of the marine plan. We also welcome the governance structures that have been set up within the Marine Transition Programme that enable close and early engagement internally within Welsh Government, wider Whitehall and also with external stakeholders. We believe that these structures, and the relationships and discussions that will be promoted here, will bring the 'added-value' that is the primary objective of integrated marine planning.

At such a high level there is much we would wish to see reflected within the plan that could be covered within the proposed outline. The following comments therefore emphasise some of the topics and issues that we believe should be tackled within the marine plan document (over and above those that we have alluded to within our response to Q2), and not necessarily a list of additional areas that should be added to the outline.

It is particularly valuable to see that the land-sea interface and Integrated Coastal Management are specifically picked up within the scope of the plan. We believe that the marine planning process has a significant role in supporting better-integrated management of the coastal area. With a large proportion of the Welsh population living at the coast, the importance of this area to the local economy and the sensitive environmental features and physical processes that are located there, marine planning, if aligned well with the terrestrial planning regime, offers an important opportunity to manage this interface in a

more sustainable and joined up way. We note that in Scotland a Planning ‘Circular’² has been drafted to provide guidance on the relationship between the marine and terrestrial planning. We suggest that as a part of the development of the WNMP, consideration should be given to developing similar appropriate guidance for Wales. This could usefully be aligned to potential changes that are being considered as part of the current development of the Planning (Wales) Bill.

We particularly welcome the plan containing a significant section on Natural Resources. The marine plan document will be an important opportunity to clarify the role of the marine planning process in delivering Government’s Integrated Natural Resources Management policy nationally and at an area scale highlighting the relationship between this work within Wales and the commitment to develop marine plans based on an Ecosystem Approach, as set out in the UK Marine Policy Statement. For this reason, we suggest that the Ecosystem Approach should be a specific focus within section 10 – potentially under ‘over-arching principles’, if not a sub-section in its own right.

Whilst we recognise the value of bringing nature conservation within the ‘Natural Resources’ section we suggest that neither ‘Good Environmental Status’ or ‘Nature conservation’ (as opposed to biodiversity and geodiversity) are natural resources in their own right, but rather a set of relevant policies relating to the protection and sustainable management of natural resources. In particular, we suggest that a section is needed for Marine Protected Areas in its own right. This is because the MPA network represents an important set of spatial ‘policies’ in itself, in addition to being an important Government commitment to deliver under a number of drivers, not least the Marine Strategy Framework Directive.

A critical role for the plan will be to ensure integration between different policies within the document that may interact in some way. The marine environment potentially offers more opportunities than on land for co-location of different compatible opportunities, for instance. Throughout, the focus of the plan should be on optimising benefits for economic, environmental and social interests, both within the strategic context of the plan and in influencing the way projects are developed at a more local level. We believe that this is the particular added value to be gained from the marine planning process, over the current more sectoral approach to management of our marine resources. To address this, we suggest that within each sector chapter key interactions with, for example, environmental interests should be explored, with associated policies developed or signposted (within and outside the plan) as appropriate. We note that section 24 ‘spatial integration’ will also be helpful in this regard. However, we suggest that to be of use to decision makers this

² ‘Planning Scotland’s Seas. The relationship between the statutory land use planning system and marine planning and licensing’. Draft Circular. Scottish Government, July 2013.

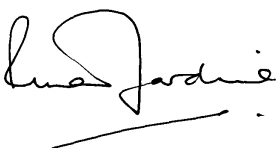
should also make some assessment of policies/objectives that aren't complimentary, as well as those that are.

Given the key role we see the WNMP playing in the development and delivery of Natural Resource Management policy (as set out in our response to Q2) we would also advise that the plan could usefully explore appropriate spatial management areas for the marine environment that would be suitable for sub-national policy development and management in the future. This could usefully set the scene for further consideration of Natural Resource Management within the marine environment to align the marine plan with policy development in the terrestrial area through the Environment Bill. The selection of such areas could be driven by key spatial work that is currently in development. This would include both the development of national seascape character areas, and work to define regional units for the improved management of the Marine Protected Area network within Welsh waters. Natural Resources Wales is working closely with Welsh Government on both of these programmes of work and consider these a suitable spatial context for discussion of the smaller scale application of marine planning and management processes in subsequent iterations of planning.

Finally, we recognise that in developing the first plan, getting the process right is critical. However, we suggest that the ultimate goal for planning is to develop clear, measurable and integrated objectives that ensure that the benefits we seek – improved decision-making, making the most of the marine area for environmental, economic and social gain – can become a reality within the 20 year vision set out in this consultation. We therefore look forward to continuing to work with Government to develop realistic and achievable objectives that can be delivered through the new process of marine planning for Wales.

If you have any queries regarding these comments, please do not hesitate to contact our Marine Resource Management Advisor, Kirsty Lindenbaum at kirsty.lindenbaum@cyfoethnaturiolcymru.gov.uk, 03000 654925, in the first instance.

Yn gywir / Yours faithfully



Rhian Jardine
Head of Sustainable Communities
Pennaeth Cymunedau Cynaliadwy