



EUROPARC
Atlantic Isles

Conservation without frontiers

UK Marine Policy Statement: A draft for consultation

A consultation response by the Europarc Atlantic Isles Coastal and Marine Working Group October 2010

Introduction

1. The Europarc Atlantic Isles (EAI) Coastal and Marine Working Group (the Group) was established to consider the many issues for coastal protected landscapes posed by the emergence of marine planning and the opportunity this affords to enhance planning and management of the coastal and marine environment. The Group's membership includes National Parks and AONBs, the National Government Advisers, NGOs and the National Associations for National Parks and AONBs. The Group appreciates the opportunity to comment on the UK Marine Policy Statement draft for consultation

The work of the Group

2. The focus of the Working Group's interest is on the conservation of the UKs finest coastal landscapes and seascapes, in particular the connection between land and sea in this context. The map of protected landscapes in UK [see Annex] shows a significant proportion of the coastline of England, Wales and Northern Ireland has been designated AONB or National Park on account of the high quality of the landscape. Similarly in Scotland long stretches of coast have been designated as National Scenic Areas and legislation exists to designate these areas as Coastal and Marine National Parks. Much of the coast of England and Wales has also been defined as Heritage Coast in recognition of its outstanding undeveloped character.
3. In May 2010 the group hosted a workshop at Losehill Hall to look specifically at 'Coastal Protected Landscapes and the Marine Planning System'. Delegates represented a broad range of organisations with an interest in coastal protected landscapes in the UK. A presentation on the draft MPS was made on behalf of Defra by Stephen Brooker of the MMO. Stephen Brooker also made a presentation on the MMOs aspirations for marine planning with particular reference to protected landscapes and the opportunities presented by the advent of marine planning to enhance an integrated approach to coastal and marine management. A copy of the workshop report was sent as a pdf file accompanying this consultation response

Principles for the conservation of seascapes

4. The Workshop came to a number of conclusions that are of particular relevance to the Marine Policy Statement and form the basis of the scrutiny of this consultation by the Group. In summary participants agreed the following principles, which they would expect the marine planning process to adopt:
 - a. **All Seascapes matter** and those of national importance need to be identified, recognised formally and protected – coastal protected landscapes will be key components of nationally important seascapes
 - b. **Comprehensive assessment of the character of seascapes needs to be undertaken** as a baseline for marine plans and for establishing what is special about particular areas
 - c. **Their future depends on the integration of planning and management between land and sea**, with particular implications for marine plans, terrestrial plans and protected landscape plans
 - d. **Successful integration between land and sea depends on relationships between stakeholders** - the formation of new relationships e.g. with the MMO and the re-orientation of existing ones

5. In more detail, the Workshop concluded that:
 - a. seascapes exist, they matter and some are of national importance – they are more than just the view, embracing ecological and cultural resources in the marine environment. People care about them, access to them is fundamental to health and well being and they have a positive impact on the economy, especially in more remote areas. They need to be sustained for future generations.

 - b. to secure their sustainable future it will be very important that
 - “seascapes” are recognised as a key resource in the marine environment and their interests are addressed in policy at all levels, especially in the Marine Policy Statement, in Marine Plans and in planning policy guidance on land
 - a clear definition of what is meant by “seascape” is adopted nationally, building on the definition of landscape in the European Landscape Convention [already used by Europarc and NE] and on the breadth of definition devised by IUCN
 - a basis for the recognition of “nationally important seascapes” and the means of looking after them is agreed nationally
 - coastal protected landscapes are recognised as an integral part of the wider seascape, at the crucial place where land meets the sea, and that they are more than likely to be key components of “nationally important seascapes” and will be key players in marine planning especially inshore

- c. the assessment of seascape character will be crucial to the marine planning process; a consistent all embracing methodology is needed:
- with the definition of seascape character areas providing a valuable framework for considering all aspects of the marine environment and their interaction with maritime activities; and
 - the assessment providing a starting point for the identification of the “special qualities” that would underpin the recognition of “nationally important seascapes”.
- d. Integrated planning and management will be essential both in the marine environment and between land and sea. It will be very important for terrestrial planning to play a leading role in optimising the links between land and sea. To achieve that in the context of Coastal Protected Landscapes:
- protected landscape management plans should be used as a tool for integration as they do already on land; they should reflect their relationship with the marine environment and should be underpinned by a thorough assessment of the “special qualities” they derive from the marine environment and their association with it and the risk posed to those qualities by marine and marine-related activities
 - the principles underpinning the Heritage Coast concept, which has served as an important link between land and sea in England and Wales, is refreshed – clarifying their status and remit for the future.
 - national guidance will be needed to reflect the relationship between protected landscapes and the marine environment and to encourage protected landscapes to overcome any reluctance to address issues beyond their boundary at the mean low water mark
 - those responsible for the planning of the marine environment will have to ensure that their “duty of regard” towards any plan prepared for the marine area or adjacent coast embraces the statutory plans prepared for protected landscapes;
- e. Successful integration will be achieved by close working between stakeholders in protected landscapes and in the marine environment. To assist this:
- the valuable role that can be played by coastal partnerships and fora in bringing stakeholders to the table should be capitalised upon around the whole of the coast of UK

- coastal protected landscapes should be major players in such partnerships – they are there to help an integrated approach as they do on land

General Comments on the consultation draft

6. The Group welcomes the restructuring of the document, in particular the improved recognition of seascapes [see below], since the pre-consultation draft and the intent set out in Chapter 1 Section 1.3 to achieve integration with terrestrial planning regimes is also welcomed.
7. However, the Group is disappointed by the failure in the draft to identify strategic policy priorities necessary to provide a clear focus and clarity for marine plan authorities and decision makers. It is understood that there is a reliance on this clarity being teased out as each marine plan is developed. This may work in Scotland, Wales and Northern Ireland where the Governments are indicating an intention to create National Marine Plans following quickly on after adopting the UK MPS. In England this will not be the case, where it will be several years before the first marine plans begin to provide policy prioritisation and a decade before this is achieved in all English Marine Plan areas. In the light of this the Group believes there is a clear need to develop a mechanism for England through which strategic priorities for the whole English marine area can be identified.

Comments on Chapter 2

8. As indicated above the Group welcomes the improved recognition to seascapes in Chapter 2 Section 2.13 of the document. However, it does not consider that the principles set out above are adequately addressed, in particular, that there is no
 - a. clear definition of what seascapes are nor any indication that they are about more than just the view
 - b. indication that a comprehensive assessment of seascape character and definition of seascape character areas is needed to provide a framework for considering all aspects of the marine environment and their interaction with marine activities
 - c. basis for deciding the relative importance of seascape areas and therefore no basis for recognising nationally important seascapes nor any guidance on how the special qualities of seascapes should be conserved
 - d. indication that coastal protected landscapes are an integral part of the wider seascape, nor encouragement that their managers should take an active part in the marine plan process and the integration of land and sea
 - e. reference to the responsibility that marine planners have to ensure that their duty of regard towards any plan prepared for the marine area or adjacent coast embraces the statutory plans prepared for protected landscapes i.e. their management plans

9. The question of the definition of what is meant by seascape could be strengthened by

- a. more accurately reflecting the nature of our obligations as a signatory to the European Landscape Convention and the following text should be added:

. ‘UK is a signatory to the European Landscape Convention (ELC) which embraces *land, inland waters and marine areas*, the latter extending as far as territorial limits. The Marine Policy Statement will help the UK achieve our obligations under the ELC by giving proper consideration and due regard at a strategic level to issues associated with coastal landscape and seascape’

- b. including the definition of seascape used in the ‘High Level Objectives for the Marine Environment’ - “*an area of sea, coastline and land, whose character results from the interactions of land with sea, by natural and or human factors*” – this is derived from the ELC definition of landscape
- c. Additionally it would be helpful to reference in the definition of a protected landscape/seascapes developed by the highly respected International Union for the Conservation of Nature (IUCN), which demonstrates the breadth of what seascapes are all about i.e more than just the view. A Protected landscape/Seascape is:

“ an area of land with coasts and seas as appropriate, where the interaction of people and nature over time has produced an area of distinct character with significant AESTHETIC, ECOLOGICAL AND/OR CULTURAL VALUE, and often with high biological diversity, safeguarding the integrity is vital to the protection, maintenance and evolution of such an area”

10. Also in Chapter 2

- a. 2.3. bullet 8 - should refer not just to sites of importance but also areas i.e seascapes + landscapes
- b. 2.5 - this is an important section but the final para on page 30 refers only to cultural heritage - it should refer to seascapes and biodiversity
- c. 2.9 - there should be reference to historic seascape assessment
- d. 2.11 - the impact of coastal change and flooding/erosion on seascapes/landscapes will be central to planning in the future (impacts could be both positive and negative). The MPS should better reflect adaptation in the face of climate change and the attributes that marine and coastal planning needs to develop to deliver adaptive responses.

Comments on Chapter 3

11. We are concerned that having discussed in Chapter 2 the importance of seascapes, Chapter 3 then fails to give any recognition to seascapes as a key resource in the marine environment. It needs to recognise that seascape is a vital part of the overall framework of marine planning and that the high level approach to marine management set out in the UK MPS should be guided and informed by a seascape/landscape character assessment. This seascape character assessment will need to take full account of sensitivity/capacity issues and cumulative impacts. Chapter 3 of the UK MPS continues to treat seascape as a bolt-on rather than a foundation or building block for marine planning.
12. The introduction to Chapter 3 suggests that its role within the document is to provide guidance on the pressures and impacts associated with a range of activities in the marine environment. Chapter 3 fails to make a single reference to the impacts of any of the activities on seascape in the context of coastal protected landscapes or indeed of the wider coast beyond these special areas. The activities referred to in Chapter 3 need to be integrated with the resource that is landscape/seascape.

Consultation questions

13. Questions 1-3 of the consultation have been covered in sufficient detail in section 3 of this response. The Group does not intend to respond to Questions 4-9 of the consultation which are of a rather specific and technical nature and prefers instead to focus comments on the rather more substantive issues arising from Question 1-3.

Further information

14. The Europarc Atlantic Isles Coastal and Marine working group would welcome the opportunity to contribute further to the development of the UK MPS and indeed to the establishment of a marine planning system across the UK

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Annex

