



EUROPARC
Atlantic Isles

Conservation without frontiers

Consultation on a marine planning system for England
A response by the Europarc Atlantic Isles
Coastal and Marine Working Group
October 2010

1. Introduction

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 Consultation on a marine planning system for England

2. Recent work of the Group

The work of the Group is focused on making the connection between land and sea in the context of protected landscapes (AONBs, National Parks and Heritage Coasts).

The group hosted a workshop at Losehill Hall in May 2010 titled '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. Stephen Brooker of the MMO made a presentation on the organisations aspirations for marine planning with particular reference to protected landscapes and in broad terms reflected on what a marine planning system for England might look like. A copy of the workshop report was sent as a pdf file accompanying this consultation response

2.1 Key points arising from the workshop in relation to the Consultation on the marine planning system for England are:

i) **Seascapes matter – and those of national importance need to be identified formally and protected.** The report requests that National Agencies develop an agreed definition of seascapes, undertake a comprehensive assessment of the character of seascapes and their special qualities and develop a means by which nationally important seascapes can be formally identified and protected.

ii). **Marine planning systems, including the one being established for England must give proper recognition to ‘seascapes’** as a key resource in marine and coastal environments and see this recognition flow through into marine plans and planning policy guidance on land.

iii) **Integration between land and marine planning** – confirms a determination amongst coastal protected landscape managers to seek to ensure that coastal planning recognises coastal protected landscapes as an integral part of the wider seascape and that marine planning addresses this, especially in the inshore.

3. Our response to the consultation

3.1 The Group supports the document and believes that it sets out a clear vision for what a marine planning system for England should look like.

3.2 We welcome the recognition of the importance of integration with terrestrial planning regimes.

3.3 However, we are concerned that

- the significance of coastal protected landscapes and the management plans they have to prepare are not given sufficient prominence in the planning process
- the nature of seascapes are not fully understood and articulated – they are more than the view
- the need for comprehensive seascape character assessment and the identification of seascape character areas are not recognized

3.4 Addressing these concerns is important because the 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. In relation to the development of marine planning in England our obligation under the ELC is to give proper consideration and due regard at a strategic level to issues associated with coastal landscape and seascape .

3.5 Chapter 2 of the document A Marine Planning System for England document can address these concerns by acknowledging 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, the design of

the marine planning system for England, 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]

“ an area of sea, coastline and land as perceived by people, whose character results from actions and interactions of land with sea, by natural and/or human factors”.

- and on the definition devised by the 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”

- 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”.

3.6 We have a number of detailed comments to the specific questions raised through the consultation with particular reference to fulfilling our obligations as signatories to the European Landscape Convention and achieving compatibility between marine plans and statutory coastal AONB and National Park Plans. These are addressed in our response below

4. Europarc Atlantic Isles Coastal and Marine Working Group responses to the specific questions

Q1 Do you agree that we have identified and captured within Chapter 1 all the benefits of marine planning?

Page 3 Section 1.14 – an additional bullet regarding direct benefits could read:

- *Maximising the effectiveness of coastal terrestrial and inshore marine protected areas leading to improved conservation of natural and built heritage features and the land and seascape.*

Page 4 section 1.15 –

Bullet 1 amend to - *Sustainable development of marine and coastal environments incorporating improved protection and enhancement including seascapes*

Bullet 3 amend to - *integration with terrestrial planning facilitated e.g. more appropriate and joined-up infrastructure development and protected area management*

Bullet 6 – amend to – *increased knowledge and understanding of coastal and marine heritage and cultural assets (including seascapes) so that they can be afforded maximum protection*

Q2 Have we set out and appropriately considered in Chapter 2 and elsewhere the elements required before marine planning can begin?

Page 5 – Our obligations as a signatory to the European Landscape Convention should be specifically mentioned in the text box that spans pages 5/6

Suggested text -

‘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. Marine Plans will help us 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

Page 8 – Point 2.12 We welcome promotion of the three dimensional nature of the marine environment which helps advocate the need for seascape characterisation to acknowledge this and to reflect the accepted holistic approach of landscape characterisation, rather than remain predominantly concerned with visual character/aspects.

Page 15 – Section 2.38 - at end of current text add

and opportunities for integration with adjacent terrestrial plans

Q3 Does the proposed structure and content for Marine Plans provide appropriate clarity to enable the MMO to create effective Marine Plans for England (Chapter 3)?

Page 21 section 3.8 5th Bullet - add seascape to this list

Page 26 section 3.30 add - The Policy Map should include relevant areas alongside the plan boundaries – for example Protected Landscapes (including Heritage Coasts). This provides a means to deliver the intent of integration expressed in Sections 4.6, 6.4, 6.50,6.51.

Q4 In Chapter 4 have we covered all steps required to draft Marine Plans?

Page 36 section 4.10 – the list should include National Park Authorities to achieve consistency with point 6.18

Q5 Are the roles and responsibilities of key stakeholders clear in Chapter 5?

No – In Para 5.25 there is a welcome reference to National Park Authorities but:

- this refers only to their statutory planning role not the fact that they have to prepare management plans
- there is no reference to AONB partnerships – they are of course linked to local authorities and are not statutory land use planning authorities. However, they are required to prepare a management plan under the Countryside and Rights of Way Act 2000

Q6 In Chapter 6 is it clear how the marine planning system interacts with plans and processes on land?

There needs to be greater attention given to and explicit mention of the need to achieve compatibility with coastal AONB Management Plans and National Park Plans. Both are statutory plans under the provisions laid out in a number of pieces of countryside legislation. AONB and National Park plans mirror the jurisdiction of land planning in England by extending into the marine environment to mean low water. Heritage Coast plans, though non-statutory in nature, also need to be given proper consideration

A new bullet should be added 6.29 to reflect the above.

Consideration also needs to be given to the principles underpinning the Heritage Coast concept, which has served as an important link between land and sea in England and Wales.

In paragraph 6.18 there is a welcome reference to the need for the MMO to work with National Park Authorities. In view of the statutory requirement for local authorities to

prepare management plans for AONBs, the MMO should also build sound relationships with AONB Partnerships. This was specifically mentioned by the MMO at the Workshop referred to above.

In paragraph 6.23 there should be reference to AONB and National Park management plans that are required by statute

Paragraph 6.32 is misleading - the reference to AONBs implies that their management plans are non-statutory, when in fact they have to be prepared. It would probably be best to delete references to AONBs here. A reference should however be added in relation to Heritage Coast, five of which exist in discrete form beyond the boundaries of AONBs and National Parks and for which Heritage Coast Plans have been developed as non-statutory plans

In paragraphs 6.39 and 6.40 there is a useful reference to the integrated planning of nature conservation designations across the land sea divide. It would be very helpful to add a point here regarding the relationship between coastal protected landscapes and marine nature conservation and the value of joint planning of land and sea. The great majority of coastal protected landscapes have designated European Marine Sites adjacent to them [see maps at Annex 1 and Annex 2]. The Workshop referred to above received a presentation on the joint plan prepared for the Northumberland AONB and the Berwick and Northumberland EMS [see Workshop report], which demonstrated the value of integrated working.

The reference to Landscape designations in paragraphs 6.50 and 6.51 is welcome, but as illustrated above there is a need to draw them consistently into other parts of the document.

In paragraph 6.50 it would be helpful to add Heritage Coast to the list at the start of the sentence and extend the final sentence as follows “to avoid compromising the objectives of designation of these areas, as amplified in their management plans”. This would make things much clearer for marine planners and potential developers in terms of the nature and sensitivity of the resource being protected.

In paragraph 6.51 reference to visual impact of development on seascapes alone is insufficient. As shown above seascapes are about more than just the view. Additionally the first 5 words of this statement should be removed as this is a ‘must do’ for marine plan policies

Also in paragraph 6.51 there is reference to the need for liaison with terrestrial authorities. This is to be welcomed but it does not suggest close working between the MMO and protected landscapes, nor does it demonstrate the significance of protected landscapes around the coast of England [some 30%]. This was discussed at length at the Workshop and it was concluded that the closest working possible should be established with the MMO.

Q7 In Chapter 7 is the approach to decision making both during and after the adoption of Marine Plans clear?

Yes

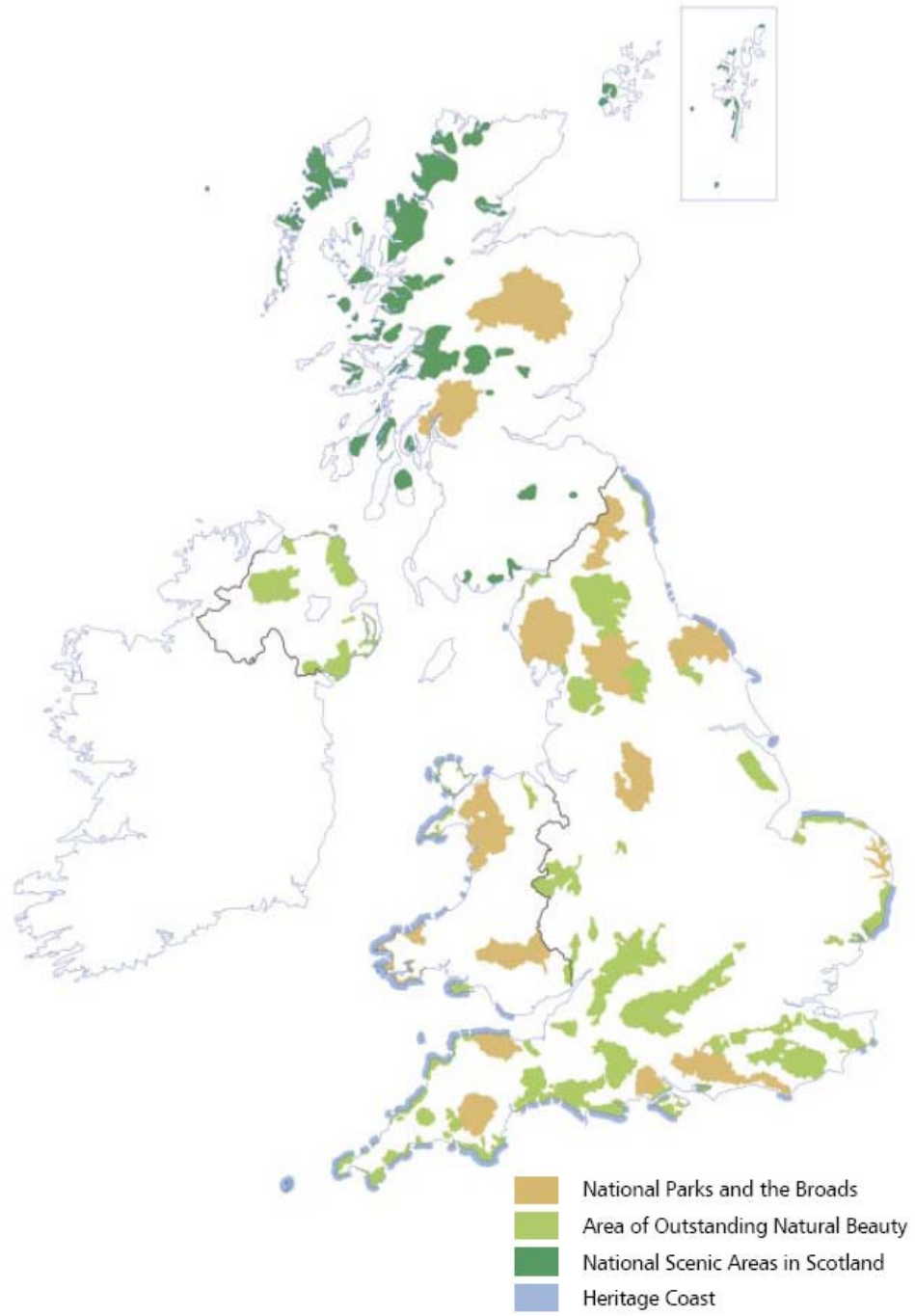
5. Further information

The Europarc Atlantic Isles Coastal and Marine working group would welcome the opportunity to contribute further to the development of the marine planning system for England.

Contact details

Phil Dyke,
Chairman
Coastal and Marine Working Group
Europarc Atlantic Isles
Email: phil.dyke@nationaltrust.org.uk

Annex 1 - Map showing UK Protected Landscapes



Annex 2 – Map showing relationship between English and Welsh Coastal Protected Landscapes and adjacent existing European Marine Sites (shown in blue). Note the pSACs currently being considered by UK and EU are not shown on this map but will add considerably to the list of coastal protected landscape that sit adjacent to an EMS.

