Dear Sirs,

CONSULTATION ON A MARINE PLANNING SYSTEM FOR ENGLAND
Response from the Marine Biological Association

• The Marine Biological Association (MBA) is a Learned Society established in 1884. The MBA has about 1000 members and runs The Laboratory in Plymouth where 60 staff work. MBA members have been at the forefront of providing scientific information to support marine environment protection, management and education and much of the scientific information that underpins decision-making about environmental protection has come from work undertaken at the Laboratory.

• Consultations are sent to all members of the society who have indicated an interest in varying areas of policy. Key experts amongst MBA staff have also been consulted.

• The MBA is a founder member of the Plymouth Marine Sciences Partnership, a federation of seven partners based in Plymouth all of whom tackle different aspects of marine science and technology research and training in a complementary way.

MARINE PLANNING SYSTEM FOR ENGLAND

General Comment

• The MBA

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

   a. Section 1.8: the statement that those taking decisions must do so in line with MPS and marine plans “unless relevant considerations indicate otherwise” is an extremely important statement and therefore requires some further elaboration on what these relevant considerations might be. This information is given in a footnote for section 6.26 but needs to go here as well due to its importance.
b. Section 1.11 – 1.15 There are various mentions of activities but the words “pressures” and “impacts” are not used at all in these sections. It is the pressures on the marine environment associated with the activities and the resulting impacts which are important (some activities will have little or no discernible impact whilst others will have very large impacts). It would be useful, therefore, to talk about benefits in terms of managing pressures and reducing impacts rather than just managing activities. There is a mention of “reduced risk of damage to ecosystems” in section 1.15 but this is a major benefit and achieving this has been a major driver in the development of the Marine Act and Marine Planning; this benefit should therefore be more clearly stated.

c. Overall, and subject to the comments above, the benefits of marine planning have been adequately identified and captured in Chapter 1.

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

a. Section 2.28 – 2.35. This section is absolutely fundamental to the success of the marine plans but there is no use of the word “science” at all. Although it is recognised that the term “evidence” includes scientific evidence, it is important to make this explicit. Scientists gathering data and undertaking research are providing the evidence on climate change, environmental response to anthropogenic impacts and undertaking scientific monitoring. It does seem odd to mention evidence, data and other terms but not to mention science specifically.

b. There also needs to be a mention in this section of the method for proceeding where evidence is lacking and cannot be reasonably obtained through commissioning new research. Although some detail on this is included in the MPS (with respect to the precautionary principle), it would be useful to at least acknowledge here the possibility that evidence is sometimes simply not available in the required timeframe.

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

a. Section 3.49 states “The MMO might consider publishing guidance on data sets, data sources, frequency of collection and/or establishing a monitoring advisory group to provide technical advice on the specification, method of collection, analysis and interpretation of monitoring data for each Plan”. It has already been acknowledged within the document that there are already mechanisms for coordinating and overseeing monitoring (UKMMAS) and coordinating marine data (MEDIN). It is unclear, therefore, why another group needs to be set up, particularly as most of the data providers mentioned are already part of UKMMAS and/or MEDIN? Maybe a liaison group with UKMMAS and MEDIN would be more appropriate?

b. Section 3.46 – 3.61. We suggest that serious thought be given as to how UKMMAS monitoring coordination responsibilities and those of the MMO are brought together to maximise resources and avoid duplication of effort. Although UKMMAS is
mentioned there is not enough information on how its functions link to MMO needs and responsibilities.

In particular, is the overall approach to planning recommended and outlined in paragraphs 3.7 to 3.9 appropriate?

Yes.

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

a. Section 4.25 – 4.29. General ecological and other information is referred to here as needing to be collated. Another valuables set of data, namely information on socio-economics and the UK marine environment is becoming available. The National Ecosystem Assessment is gathering together all available data on the socio-economic value of ecosystems including marine. This would seem an ideal data layer to add the environmental data already mentioned.

b. Section 4.51 – 4.52: The MBA applauds the idea of using modern technology (GIS, Geospatial modelling) and the interconnectivity of the Internet to support marine planning development and implementation. We believe that such development would be most cost-effective if it used and helped develop existing online resources designed to provide the evidence required by environmental managers and hence planners. One such resource is the huge review of the UK’s biodiversity, their biological traits, and the effects of human activities on marine species and habitats developed by the Marine Life Information Network (MarLIN), originally funded by Defra and the statutory agencies. It should be remembered that the evidence base must also be underpinned by reference to original research, much of which is held by specialist libraries such as the National Marine Biological Library.

Subject to the comments above, all steps required to draft Marine Plans have been covered.

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

a. There seems little point in commenting on the details in chapter 5 before the comprehensive spending review as many of these bodies are under review. However, a two general points can be made:

b. Stakeholder engagement is vital for the success of marine plans. However, it is also important to stress that the planning process is constrained in terms of the overall policy objectives the plans are to address and scientific evidence informing decisions. This is important as interest groups may have their own “vision, goals and objectives for a plan but these cannot contradict higher level policy aims.

c. only statutory agencies and Cefas are mentioned in terms of providing scientific evidence and data. There are many other science sectors such as Higher Education Institutions (HEIs), research councils (e.g. NERC) and marine laboratories who all undertake international, national and locally based research and it would be good to
acknowledge the important role of these bodies with respect to stakeholder engagement and provision of advice.

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

There is useful detail on the numerous plans, both terrestrial and marine, which will have to be taken into account. There are also lots of good intentions in terms of regarding integration. What is not clear in this chapter, (for example in sections 6.45 – 6.49) is the hierarchy in terms of ultimate decision making. In an ideal world there will be prefect integration of all these plans and policies with no room for dispute. It is likely, however, that there will be instances of competing aims between the various planning systems and this chapter is not at all clear on how these conflicts wouldl be resolved.

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

No comments.

IMPACT ASSESSMENT

8. Do you have any comments on, or additional evidence to improve, the Impact Assessment?

No.

9. In particular if you carry out, or represent, activities that fall within the scope of marine planning, are you able to provide a view of how the proposed planning system is likely to impact those activities and are you able to provide an indication of the scale of any such impacts?

N/A

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