

Draft Link response to MMO Marine Plan final NW, NE, SW, SE consultations

To be submitted in the 'other comments' section of each of the 4 online consultations

This submission is supported by the following Link members:

- *Institute of Fisheries Management*
- *International Fund for Animal Welfare*
- *Marine Conservation Society*
- *MARINELife*
- *ORCA*
- *RSPB*
- *RSPCA*
- *Whale and Dolphin Conservation*
- *WWF*
- *Zoological Society of London*

A healthy ocean underpins and is necessary for many human activities including fishing, tourism and recreation. It will also be critical in our attempts to mitigate and adapt to climate change.

Wildlife and Countryside Link recognises the important role Marine Plans have in delivering sustainable management of our seas in England. When Link campaigned for the Marine and Coastal Access Act, we hoped the marine planning regime would secure conservation outcomes through its sustainable development mandate by integrating decision making, driving sustainable development and providing a vision for our seas.

With the final consultation for the North West, North East, South West and South East plans coming to a close, we are disappointed to see this vision for Marine Planning fail to come to fruition.

Various Link members have been active stakeholders in the development process, attending workshops, webinars and responding to the multiple consultations. Throughout the process they have raised concerns about the direction of the marine planning process and offered solutions to help deliver our vision for the planning regime.

Whilst the draft plans show some evolution in the process, working to link up the marine and terrestrial environments, supporting enhancement of habitats that sequester carbon or provide flood defence and protecting fish nursery grounds, they do not go far enough to protect and restore an already degraded marine environment.

The Marine Policy statement includes an objective to '*manage competing demands on the marine area, taking an ecosystem-based approach*'. Link acknowledges that there is a considerable amount of information to be assessed and integrated across the MMO, Defra and others, in order to develop these policies, but Marine Plans should be a key tool to achieve this objective. Yet, we are concerned that the Plans silo the competing demands on the marine environment, rather than integrate and manage them. As a result, the environment is removed from thorough consideration, the significance of a healthy environment in delivering the Plans is ignored and unsustainable proposals may be supported by the process risking further ecological damage.

A key means of managing competing demands and embedding the environment at the heart of the planning system would be designing a clear hierarchy between activities and policies that mitigates and minimises the cumulative impacts of marine development. In the absence of a clear hierarchy of decision making, it is unclear how the plans will deliver the aspirations of the 25 Year Environment Plan (clean healthy, biologically diverse) or the requirements of the Marine Strategy Regulations (2010), and prevent further degradation of the marine environment by poorly sited plans, projects or activities. Currently environmental policies make concessions or reference to development which appears to be prioritised, but policies relating to development and activities fail to make any meaningful reference to the environment. Instead, all activities that could hinder progress in achieving Good Environmental Status under the UK Marine Strategy, damage the ambitions of the 25 Year Environment Plan or impact the management of sites protected under the Birds and Habitats regulation, should be given lower priority, or avoided altogether through an effective hierarchy scheme.

Marine Plans should play a vital role in underpinning an effective, sustainable marine governance framework, but many of the activities the Plans are designed to manage will be impacted if our seas continue to decline. To protect our marine environment - for nature, our climate and livelihoods - it is vital that these problems are urgently resolved and changes are incorporated into reviews of existing plans. This should start with the East Marine Plan, as recommended by the Three-year Report on the East Inshore and East Offshore Marine Plans, paragraph 17.

(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/875887/marine-east-plan-report1.pdf) We are ready and willing to work with the MMO to support this process and ensure future plans don't make the same mistakes of the past.