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Llywodraeth Cymru
Welsh Government

Welsh Government

Consultation – summary of response

Draft Welsh National Marine Plan

July 2018

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.

This document is also available in Welsh.

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1 Introduction

- 1.1 Welsh seas are important to us; Wales consists of around 32,000 km² of sea, as well as 21,000 km² of land fringed by 2,120 km of coastline. Our marine area is larger than our land area and comprises diverse and valuable natural resources.
- 1.2 Our seas are becoming increasingly crowded, leading to competing demands for space and use of our natural resources. We recognise the importance of our marine natural resources and that healthy, resilient marine ecosystems underpin our economy, health and well-being and are important for our culture. We are committed to managing our seas in a more integrated and planned way to ensure their long-term sustainability. This will mean doing things differently including introducing a forward-looking, proactive and spatial approach to marine management.
- 1.3 The Marine and Coastal Access Act 2009 (MCAA) sets out the statutory basis for a new plan-led system for decision-making on marine activities throughout the UK. The Welsh Ministers are the planning authority for the Welsh inshore and offshore areas.
- 1.4 Marine planning provides an overarching framework for managing Welsh seas, helping to ensure that marine natural resources are managed and used in a sustainable way and thereby contributing to Wales' well-being of future generations goals set out in the Well-being of Future Generations (Wales) Act. Through an integrated and plan-led approach, marine planning will make an important contribution to delivering our vision for our seas. The implementation of marine planning processes will help to facilitate more effective management and use of marine resources by creating the framework for consistent, sustainable and evidence-based decision-making. It enables Governments to set a clear direction for managing our seas, to clarify objectives and priorities, and to direct decision-makers, users and stakeholders towards more strategic and efficient use of marine resources. .

2 Consultation and stakeholder engagement

2.1 The Welsh Government's 16 week consultation on the draft Welsh National Marine Plan (dWNMP) was launched on 7 December 2017 and closed on 29 March 2018. The consultation was issued electronically to a wide range of stakeholders and was made available on the Welsh Government website.

2.2 This consultation built on previous related consultations and engagement between November 2015 and January 2016, on the:

- Statement of public participation for marine planning.
- WNMP Vision and Objectives.
- The evidence base (Strategic Scoping Exercise).
- Scoping of the plan SA/HRA.
- An initial draft of the WNMP.

2.3 In January 2017, we updated our Statement of Public Participation (SPP)¹ and confirmed the intention to have a draft plan ready to consult within the year. The SPP sets out how interested parties can be involved in the marine planning process.

2.4 The dWNMP on which we have consulted has been amended in response to the comments received from these earlier consultations and proactive dialogue with key interested parties. This covers both Welsh inshore waters (out to 12 nautical miles) and offshore waters (beyond 12 nautical miles) in a single document. The landward extent of this plan is to mean high water spring tides. It applies to the exercise of both reserved and devolved functions within this area.

2.5 The dWNMP and consultation document were accompanied by several supporting documents, including:

- An overview of the developing Welsh National Marine Plan;
- A Habitats Regulation Assessment;
- A Sustainability Appraisal;
- A Review of interim Marine Aggregate Dredging Policy.

2.6 The full consultation document, dWNMP and associated documents are available [here](#).

2.7 The consultation invited views on a complete draft marine plan for the Welsh inshore and offshore marine plan areas, developed under the Marine and Coastal Access Act (2009) (MCAA).

¹ <https://gov.wales/topics/environmentcountryside/marineandfisheries/marine-planning/engagement-and-consultation/?lang=en>

2.8 To support the consultation, the marine planning portal² was updated to allow users to view spatial policy proposals and consider them alongside spatial evidence on natural resource distribution and use across Welsh seas.

2.9 The consultation was supported by active engagement with stakeholders through local drop in sessions, a wide range of discussions in meetings and a national conference:

Date	Location	Event
10 January 2018	Swansea	dWNMP Drop-in (14:00 – 20:00)
11 January 2018	Saundersfoot	dWNMP Drop-in (14:00 – 20:00)
24 January 2018	Bangor	dWNMP Drop-in (14:00 – 20:00)
25 January 2018	Aberystwyth	dWNMP Drop-in (14:00 – 20:00)
26 January 2018	Flint	dWNMP Drop-in (14:00 – 20:00)
30 January 2018	Cardiff	dWNMP Drop-in (14:00 – 20:00)
20 February 2018	Cardiff	dWNMP National Conference

2.10 During the local and national events, stakeholders had an opportunity to ask questions, voice their views, highlight their concerns and openly discuss the forthcoming challenges and opportunities for marine planning in Wales.

2.11 The marine planning portal was available at these sessions and used to demonstrate the distribution of human activities and natural resources in Welsh seas. The portal is an interactive planning tool that is intended to support the marine planning process by:

- Raising awareness and understanding of the marine data that is readily available for Welsh seas;
- Providing an understanding of the marine planning evidence base currently available;
- Providing interested parties with the opportunity to comment on the evidence base and the need or availability of further spatial evidence.

2.12 During the consultation period, the Cabinet Secretary for Energy, Planning and Rural Affairs (CSEpra) led a Senedd debate on the dWNMP on 9 January 2018. The record from this debate is available [here](#).

2.13 The Climate Change, Environment and Rural Affairs Committee took evidence on marine planning on 1 February 2018 and on 14 March 2018 the Committee held a stakeholder workshop to discuss the dWNMP. The Committee made 13 recommendations³ on the dWNMP in April 2018 which the Cabinet Secretary has responded to⁴.

2.14 All the feedback and responses related to this consultation represent a valuable source of information and ideas and will be used to inform the Welsh Government's work in further developing marine planning for Wales.

² <http://lle.gov.wales/apps/marineportal/#lat=52.5145&lon=-3.9111&z=8>

³ <http://www.assembly.wales/laid%20documents/cr-ld11543/cr-ld11543-e.pdf>

⁴ <http://www.assembly.wales/laid%20documents/gen-ld11609/gen-ld11609-e.pdf>

3 Consultation responses

3.1 The Welsh Government would like to thank all of those who attended the public meetings, provided feedback and who responded to the consultation for their time and contributions during the consultation period. In particular, members of organisations on the Marine Planning Stakeholder Reference group who have willingly given their time and shared their knowledge. Annex 1 provides a list of the organisations which responded to the consultation.

3.2 A total of 86 responses to the consultation have been recorded.

3.3 Responses were received from the following sectors covering environmental, social, economic and cultural interests:

- Academic bodies;
- Businesses;
- Government / Public Sector;
- Leisure and Tourism;
- Local Authorities, Community & Town Councils;
- Members of the Public;
- Professional Bodies & Associations;
- Representative and local organisations / Forums;
- Third Sector.

3.4 The consultation included provision for responses to be submitted anonymously, without linking to a geographical region or location within the UK. Whilst of those who included their geographical location most appeared to be (via organisation or submitted individually) from Wales, we did receive comments from the other planning authorities within the UK.

3.5 The consultation asked 17 questions related to the dWNMP and the supporting Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA). This Summary of Responses primarily focuses on the responses to questions 1 – 16 (see section 5).

3.6 Question 17⁵ asked for any additional comments that the respondents would like to make on the dWNMP. Where possible these comments have been summarised and integrated into the themes associated with questions 1 to 16. However, the nature and specificity of a number of the responses to question 17 makes it difficult to appropriately convey in a summary document. The full content of the consultation responses (including those to Question 17) are considered as part of the detailed work of Welsh Government (working with stakeholders) to review and amend the dWNMP.

⁵ Question 17 - We have asked a number of general questions, but are there any other comments you would like to make about the WNMP?

4 Summary of key themes

4.1 The consultation gave rise to a wide range of issues from which several key themes can be identified. Further details are provided in the summary to each question, as set out below:

4.2 **Sustainable development** – respondents welcomed the focus of the plan in line with the provisions for marine planning set out in the Marine and Coastal Access Act (MCAA) & UK Marine Policy Statement, however some commented there might be an imbalance in the plan’s priorities around the three pillars of sustainability (environment, society and economy). We will work with stakeholders to ensure that the plan provides an appropriate framework for the sustainable use and development of marine resources (to equitably balance environmental, social and economic interests).

4.3 **Strategic Resource Areas (SRAs) (spatial prescription)** – respondents broadly welcomed the concept, however many commented on the need for greater clarity on their practical application in decision-making and that they should not inadvertently undermine marine biodiversity including in Marine Protected Areas. We will continue to work with stakeholders to refine the concept of Strategic Resource Areas and the evidence base to support them.

4.4 **Cross border management** – respondents welcomed the focus of the plan and noted the challenges; due to marine plans in the UK and Ireland being at different stages of development. However some requested a more transparent / joined-up approach, particularly in the shared estuarine waters of the Severn and Dee. We are committed to cross border working and collaboration and will continue to work closely with other marine planning authorities.

4.5 **Evidence for planning** – was a recurring theme in the respondent’s comments noting the importance of evidence to inform decisions on the sustainable management of resources. We are committed to maintaining an appropriate evidence base to support marine planning in Wales.

4.6 **Overall plan structure** – respondents broadly welcomed the format of the dWNMP, however many commented on the length of the plan, the complexity of the issues described and the need for clearer definitions of terms. We will work with stakeholders to refine the WNMP before adoption to reduce its length and improve clarity.

4.7 **Monitoring, evaluation & reporting** – respondents noted the commitment to publish reports describing the uptake and effectiveness of the WNMP, however some commented on the need to develop these approaches transparently and compatibly with approaches of neighbouring marine planning authorities. We will

work with stakeholders to further develop our marine plan monitoring, evaluation and reporting approaches.

4.8 **Maps & data** - respondents welcomed the use of mapped information and the content and functionality of the Wales Marine Planning Portal. However some commented on the clarity and content of the figures and suggested opportunities for aligning the planning portals of the UK administrations and additional datasets that could be included. We will continue to refine and update the Wales Marine Planning Portal.

4.9 **Sustainability Appraisal (SA) / Habitats Regulation Assessment (HRA)** – prompted a lot of comments from respondents. Whilst the approach was broadly supported there were a number of specific queries and suggestions for amendments. We will review the SA and HRA to take account of these comments and consider these in the redrafting of the WNMP.

5 Analysis of responses

5.1 The following chapter presents an analysis of the responses to each individual question. The consultation questions provided the option for respondents to select their view. These have been presented in a table indicating whether a respondent has answered yes/no or strongly agree/agree/disagree/strongly disagree. Some respondents provided comments but chose not to select a specific category of view; these have been noted as 'did not indicate a conclusive view'.

5.2 The table summarises a basic quantitative assessment of responses. It should be noted that this is not reflective of the overall number of respondents. Instead it is based on the respondents who directly answered the question.

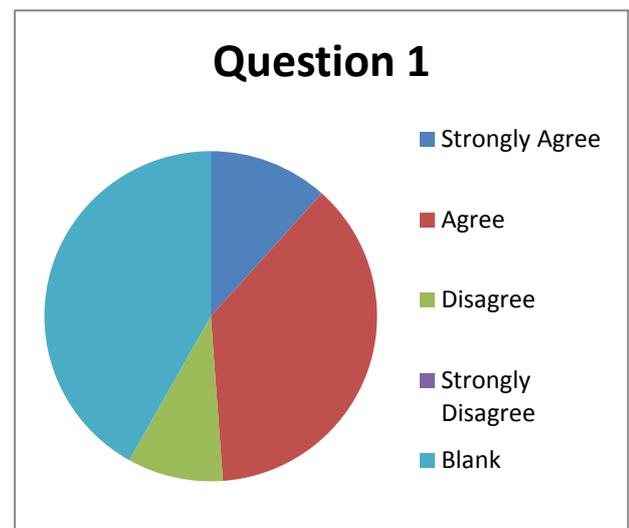
5.3 A characteristic of some of the questions raised asks whether people agreed with the approach or wished to raise comments. This led to people who often agreed with the plan to tick "No" or both "Yes and No" as they wished to add comment, thus producing a negative bias. This is illustrated by the below comment:

"the tick boxes are quite difficult to make a judgement about, because if we added a comment against a question we would have to disagree that the text in the draft was not adequate. I apologise if, just in terms of pure statistically counting of 'disagrees' we have added to an apparent negative response to the document, when in truth [organisation] welcomes and supports the introduction of the Welsh Marine Plan."

5.4 Some responses included other subject matter beyond the question asked, and all of the questions asked for expanded views. These views have been included in the following chapters wherever possible, thereby making much of the following analysis qualitative in nature.

Question 1 - Do you agree with the WNMP vision and objectives?

Summary of responses which selected options and those responses which did not indicate a conclusive option.		
Options	Number of respondents	Percentage
Strongly Agree	10	20%
Agree	32	64%
Disagree	8	16%
Strongly Disagree	0	0%
An additional 36 respondents did not indicate a conclusive view.		



Overall, there was good, broad support for the vision and objectives set out in the draft plan. Respondents were positive that the vision reflected the shared UK vision for ‘clean, healthy, safe, productive and biologically diverse oceans and seas’ as set out in the UK Marine Policy Statement⁶. There were some concerns over the balance of policies in the plan with the suggestion of too great an emphasis being placed on economic growth.

The following comments were reflective of the views presented in relation to the dWNMP vision:

“We very much welcome the vision and objectives of the WNMP reflecting the fact that blue growth and sustainable development represent core components of marine planning and management, to be considered alongside environmental protection and nature conservation.”

“We agree with the 20-year vision, which sets out, in the context of the wider vision for UK Seas, the range of important considerations and priorities for Welsh waters. We consider that this vision, which supports the need to take a long-term approach to managing our seas, provides useful clarity at a time of some uncertainty and change as we approach withdrawal from the European Union.”

“The 20-year plan period provides a platform for a long-term ambition, including making Welsh seas and the coast more relevant to the aspirations and wellbeing of the people of Wales and future generations. There is an opportunity to develop a vision alongside that of the National Development Framework so that there is a coherent and ambitious vision for all of Wales.”

“The vision is good and the recognition that blue growth and environmental protection are both critical to marine management is welcome and creates a clear direction for industry and conservation.”

“We are not convinced that the term “Blue Growth” is particularly helpful as it covers disparate industries some of which are well-established whilst others are at an early stage.”

In summary:

- It was generally acknowledged that the Vision was appropriate and fit for purpose.
- A common response was that the term “Blue Growth” needed to be better defined and applied consistently across Welsh Government. There was the suggestion that it should be clarified that a definition sets out Blue Growth as the delivery of sustainable development in line with the principles of a Sustainable Blue Economy. There was general support for the term blue growth from sectoral representatives.
- There were several views that the vision does not recognise that the marine environment is in a degraded state and this should be clearly recognised

⁶ <https://www.gov.uk/government/publications/uk-marine-policy-statement>

along with a suggestion to focus more on the need to protect and restore biodiversity.

- In line with Wales' targets to achieving Good Environmental Status of Welsh seas it was suggested that this be specifically highlighted in the vision.

The following comments were reflective of the views of respondents of the dWNMP objectives

"... the vision and objectives provide a good balance across all interests and activities in the marine environment, and are future-proofed for the lifetime of the plan"

"We consider that the plan successfully seeks to translate the UK's shared vision and High Level Marine Objectives (HLMOs) into a Welsh context, and will help to provide clarity to marine users, developers and regulators of what seas around Wales will look like in 20-years' time and how to achieve this."

"It is understood that the Plan objectives have been lined up with the UK High Level Marine Objectives (HLMO) and this approach is supported. The strategic nature of the objectives is noted."

In summary:

- It was generally acknowledged that the objectives were appropriate and supported the UK High Level Marine Objectives.
- One respondent suggested the objectives could be refined into simpler language and focussed more on the intended outcome. Related to this, there were some questions raised as to whether the objectives were 'SMART'
- There were many detailed suggestions to refine one or more of the specific objectives, with most comments related to Objectives 1, 3, 6, 8 & 9, for example:

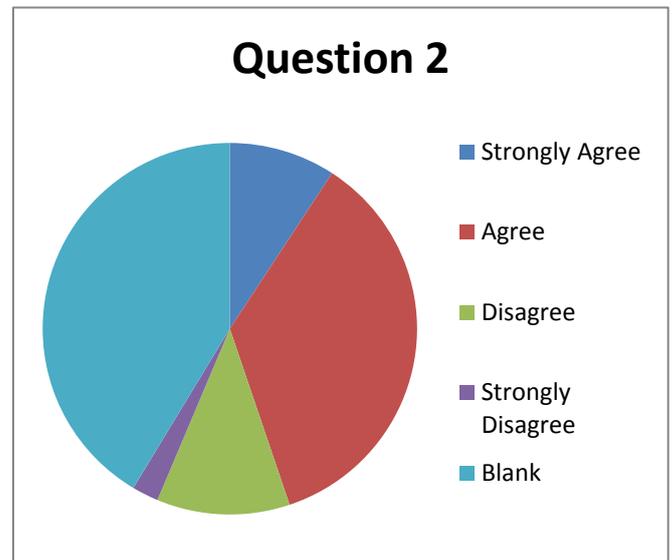
"Objective 3 should explicitly reflect the other interests and natural resources such as landscape/seascape, for example by reference to an enhanced Objective 6"

"Objective 6 could be enhanced to embrace the concept of "National Seascapes" comparable to terrestrial National Parks and Areas of Outstanding Natural Beauty (AONBs)."

Given the representations received, we intend to retain the vision and objectives as set out in the consultation draft but will work with stakeholders to agree on opportunities to refine some of the detail of the objectives as we focus on settling the text in the plan. We will take the opportunity to clarify the meaning of blue growth.

Question 2 - Do you agree that the draft plan, its objectives and policies provide a framework for sustainable development of the Welsh marine plan area? If not, how can they be amended or improved?

Summary of responses which selected options and those responses which did not indicate a conclusive option.		
Options	Number of respondents	Percentage
Strongly Agree	8	15.7%
Agree	31	60.8%
Disagree	10	19.6%
Strongly Disagree	2	3.9%
An additional 36 respondents did not indicate a conclusive view.		



The following comments and examples reflect the views provided by respondents in respect of the draft plan, its objectives and policies providing a framework for sustainable development of the Welsh marine plan area;

In summary:

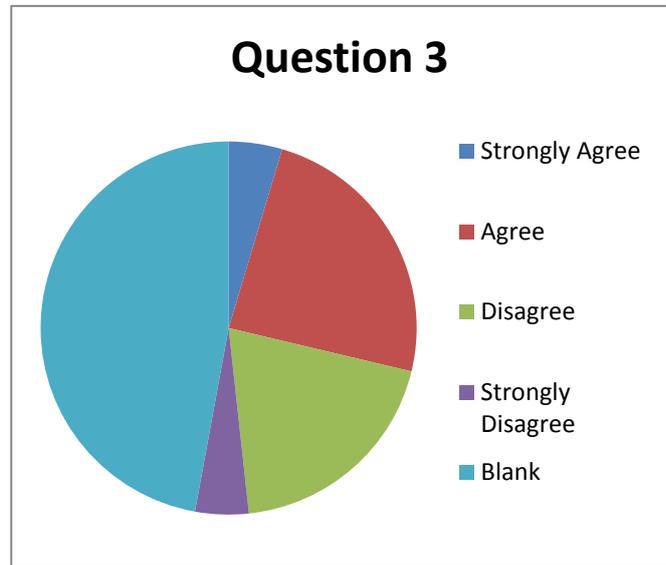
- In general, the majority of respondents were supportive of the approach set out in the plan in terms of the draft providing a framework for the sustainable development of the Welsh marine plan area. For example, one respondent stated they *“strongly support the framework set out by this first plan and consider its policies cover the breadth of considerations necessary to support Sustainable Development of our seas in line with the requirements set out in the Marine and Coastal Access Act and UK Marine Policy Statement.”*
- However, a number of respondents, primarily third sector organisations, did not consider that the draft plan adequately balanced the pillars of sustainability and was overly supportive of economic growth.
- A common view from third sector environmental organisations was that there was a lack of coherence between the plan objectives and the need to more clearly apply the requirements of the Environment (Wales) 2016 Act and Wellbeing of future Generations (Wales) 2015 Act throughout the plan. For example, one respondent stated *“We are concerned that the Plan will not result in the Sustainable Management of Natural Resources, despite it being identified as a key way in which SMNR shall be delivered in the marine environment within the Natural Resources Policy.”*

- Environmental third sector organisations raised concerns about the support for economic growth and the lack of limits set in the plan. One respondent considered that “... *economic development is prioritised above SMNR and that new legislative requirements have not been brought into the new Plan-led system appropriately.*” Another respondent stated “*The draft Plan does not provide a framework for the sustainable development of the marine area, because through its sectoral policies and Strategic Resource Areas (SRAs) it appears to prioritise economic growth over other pillars of sustainable development – in particular the environmental pillar.*”
- Within a number of comments, the need to emphasise existing legislative ‘backstops’ was made, e.g. where sites of EU and UK importance have been designated the associated legal framework sets in place rigid procedures for determining proposals (alone or in combination) that have the potential to have a likely significant effect. These are the measures against which the sectoral supporting and safeguarding policies need to comply (along with the other policies in the plan).
- Other views were more supportive of the approach to sustainable development set out in the draft. For example, one respondent suggested that “*It is likely that there will be an initial period of ‘bedding in’ once the plan has been implemented, however, we are confident that the plan will provide the overarching framework required to support decision making.*”
- Implicit in a number of the respondent’s comments was the application of the ecosystem approach, asking how the plan would equitably balance environmental, social and economic interests. The respondents noted the importance of evidence to support the sustainable management of resources and the need to maintain an appropriate evidence base to inform decisions.
- A number of respondents referred to topics and evidence that were absent, inadequate or superseded within the draft plan and Wales’ Marine Evidence Report (2015). These are being collated in an ongoing programme of work and will be used to inform future iterations of the plan.

Given the broad support for the approach, we intend to retain the overall structure and approach set out in the draft plan. Reflecting some of the comments and suggestions for improvement, we will work with stakeholders to ensure that the plan provides an appropriate framework for the sustainable development of the marine area (to equitably balance environmental, social and economic interests), in particular, providing clarity that the General cross-cutting policies apply to all sector policies.

Question 3 - Do you agree that the WNMP provides clear information and guidance to support decision making? If not, how can it be improved?

Summary of responses which selected options and those responses which did not indicate a conclusive option.		
Options	Number of respondents	Percentage
Strongly Agree	4	8.7%
Agree	21	45.65%
Disagree	17	36.95%
Strongly Disagree	4	8.7%
An additional 41 respondents did not indicate a conclusive view.		



There were a range of views expressed in terms of the clarity of information and guidance provided in the plan to support decision making. Some respondents provided suggestions on how they considered the content could be improved.

The following comments were reflective of the dWNMP successfully providing clear information and guidance to support decision making;

“In general large-scale developers should find the plan helpful and reassuring.”

“The WNMP provides a starting point to help shape decision making, but ... there are likely to be some practical issues that need to be worked out.”

“... there are limitations within WNMP around the provision of guidance and it is sensible to ensure that the plan does not get too lengthy and risks losing its focus around its objectives and policies. However, we do feel that additional guidance will be required to support decision makers and the WNMP should provide appropriate signposting to this information.”

“... for most of the plan policies, there is some useful guidance within the draft plan to clarify the intent of the policies... Clarifying the intent of individual policies is critical in this first draft plan, and providing definitions in support of each policy wording will ensure consistent interpretation and reduce dispute over policy interpretation ... In addition, we seek clarity over where a Public Authority can seek advice to support assessment of compliance”

“We acknowledge that the plan cannot reasonably include all the implementation guidance that will ultimately be required. It is critical that the Planning Authority

therefore provides clear initial guidance and ongoing support to Public Authorities to ensure that the requirements to demonstrate compliance with the plan can be easily followed by regulators, advisors and applicants. “

“We do not agree that the Plan provides clear information and guidance to support decision making; that it provides a clear approach to ensuring policies are applied to proposals on a proportionate basis; or that the general policy implementation guidance is fit for purpose.”

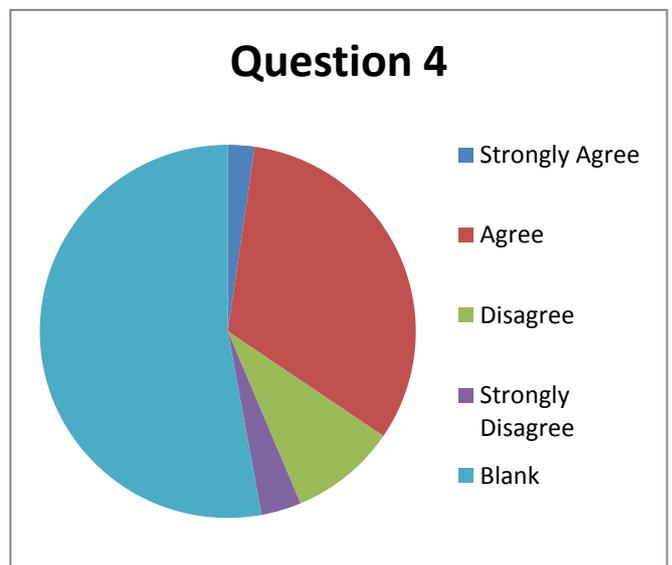
In summary:

- Whilst there were many views that there was adequate clarity and guidance in the draft plan a common view was that further information, support and guidance would be needed over time to support practical implementation of the plan.
- Several respondents highlighted that the Welsh Government’s Marine Planning Stakeholder Reference Group’s sub group on implementation had made clear recommendations that related to the need for adequate guidance to support implementation.
- Some of the respondents considered very strongly that there was insufficient clarity throughout the plan to support decision making; this view was expressed most strongly by third sector organisations.
- A common view was that further consideration needed to be given to the definitions section of the draft plan and more specificity and consistency in policy terminology was required.
- Another commonly shared view was that the plan is too long and that opportunities should be taken to move material to either annexes or outside of the plan itself as supporting implementation guidance. Some respondents suggested removal of introductory contextual material and of any duplication of existing statute.
- Other respondents suggested opportunities to improve clarity through changes to specific text in the draft or through provision of additional guidance.

Given the representations received, we consider that it is important to reduce the length of the plan and improve clarity. We will work with stakeholders to agree the core material that should be retained in the plan and any material that can be made available to support plan implementation. We will take opportunities to improve policy clarity and ensure consistency in terminology.

Question 4 - Do you agree that we have identified all relevant general policy areas, and these are fit for purpose to deliver the plan Vision and Objectives? If not, please give details why below.

Summary of responses which selected options and those responses which did not indicate a conclusive option.		
Options	Number of respondents	Percentage
Strongly Agree	2	4.9%
Agree	28	68.3%
Disagree	8	19.5%
Strongly Disagree	3	7.3%
An additional 46 respondents did not indicate a conclusive view.		



The following comments were reflective of the views presented by the respondents of the dWNMP;

“We agree that the main policy areas are covered. However, further thought might be given to how the Marine Plan relates to / overlaps with the emerging National Development Framework.”

“The policies are good and very welcome, but as with so much of these strategic objectives and policies, the mechanisms for delivery will still need work “

“The general policy areas mentioned are Economy, Social, Environment and Governance. See response in paragraph 9 regarding the omission of ‘cultural’. Several of the policies under Social (Historic Assets; Designated Landscape and Welsh Language and culture) relate to Cultural policy.”

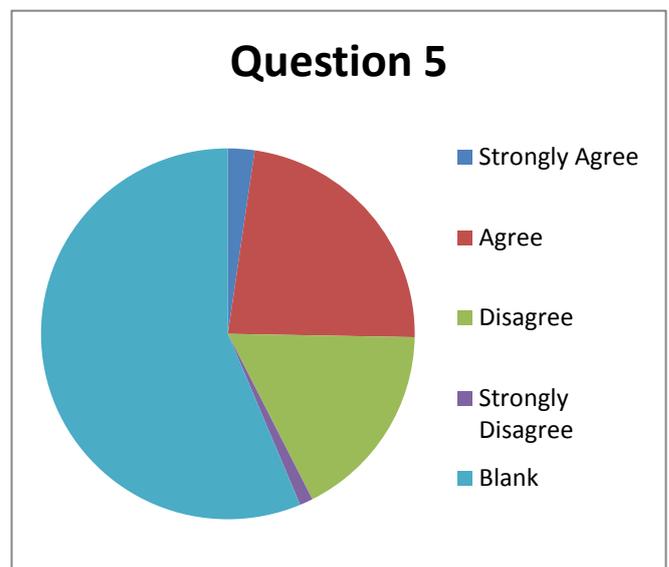
“We do not consider there are any significant gaps in the general policies within the plan and agree that they are broadly fit for purpose in delivering against the plan Vision and Objectives.”

In summary, it was generally acknowledged by most respondents that the key policy areas were covered by the draft plan.

We do not propose to add additional general policy areas into the plan.

Question 5 - Do you agree that the WNMP provides a clear approach to ensuring policies are applied to proposals on a proportionate basis? If not, please give details why below.

Summary of responses which selected options and those responses which did not indicate a conclusive option.		
Options	Number of respondents	Percentage
Strongly Agree	2	5.3%
Agree	20	52.6%
Disagree	15	39.5%
Strongly Disagree	1	2.6%
An additional 49 respondents did not indicate a conclusive view.		



The following comments and examples reflect the views provided by respondents in respect of the approach to ensure that the draft plan’s policies are applied proportionately;

The majority of respondents welcomed the commitment in the draft plan to ensure the proportionate application of the plan’s policies. The intent of this commitment is to ensure that implementation of the plan’s policies changes behaviours and practices in the marine environment towards sustainable use and development of resources whilst not creating an unnecessary burden to marine users and managers. However, a number of respondents commented that there needed to be a definition of ‘proportionate’ and ‘proportionality’ in the plan, supported by examples. Respondents commented that by describing what is deemed to be ‘proportionate’ will be needed to determine whether or not the plan achieves this objective. Such a definition should consider (for example) the scale, location, type and longevity of proposals.

Some respondents expressed concerns about the environmental impacts that certain activities could have and whether (or not) these can be managed within environmental limits. Some respondents commented that whilst the draft plan provides a framework for decision-making it does not remove the uncertainty on the extent to which activities can be managed to both support local economies sustainably for the long-term whilst also providing environmental protection. Some respondents commented on the importance of evidence being used appropriately to determine proportionality.

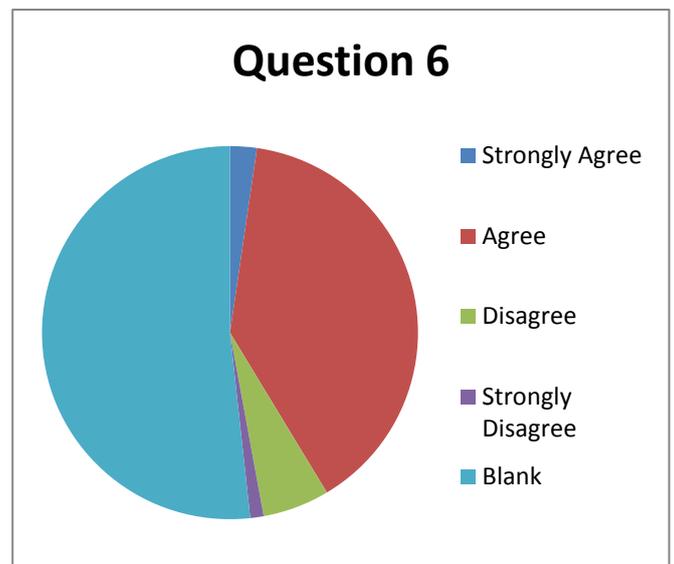
One respondent commented that the emphasis for proportionality is best set out in the first objective of the draft WNMP (para 2.6.1.5): “... *marine plan authorities*

should apply precaution within an overall risk-based approach, in accordance with the sustainable development policies of the UK Administrations. The marine plan authority should ensure that appropriate weight is attached to designated sites; to protected species; habitats and other species of principal importance for the conservation of biodiversity; and to geological interests within the wider environment.” Another respondent commented that whilst the draft plan seeks to be positive about marine developments, it should also be made clear that a ‘proportionate’ approach would include resisting/preventing developments that do not comply with all the (relevant) plan policies (unless relevant considerations suggest otherwise).

We will work with stakeholders to provide greater clarity on the definition and application of ‘proportionality’ in the plan.

Question 6 - Do you agree that the WNMP can support integration between land and sea management and contribute to the principles of Integrated Coastal Zone Management? If not, how can this be improved?

Summary of responses which selected options and those responses which did not indicate a conclusive option.		
Options	Number of respondents	Percentage
Strongly Agree	2	4.8%
Agree	34	80.9%
Disagree	5	11.9%
Strongly Disagree	1	2.4%
An additional 45 respondents did not indicate a conclusive view.		



Most respondents who indicated a conclusive opinion strongly agreed that the WNMP can support integration between land and sea management and contribute to the principles of Integrated Coastal Zone Management (ICZM).

The following comments were reflective of the dWNMP successfully providing integration of land and sea management;

In summary:

- One respondent highlighted that The Plan has the potential to make a very significant contribution to ICZM in Wales. It sets the framework for joined up thinking between Local Development Plans, the Marine Plan, Shoreline Management Plans, and the associated organisations in a plan led system. It

should be able to support integration between land and sea management by bringing historic regulatory approaches to sea management under a 'plan-led' system which operates on land. There is a role for terrestrial planning to recognise this as well.

- The similarities between the principles of ICZM and the ecosystem approach were highlighted by a respondent with the point that ensuring ecosystem approach principles are applied will support ICZM.
- Several respondents highlighted the need for a clear and close relationship between the WNMP and National Development Framework (NDF) as they develop including a suggestion that *“There is an opportunity to develop a vision alongside that of the National Development Framework so that there is a coherent and ambitious vision for all of Wales.”* Reference was also made to the refresh of Planning Policy Wales and the opportunities presented for integration.
- Other respondents felt that references to ICZM were more cursory and required more clarity.

The following comments provide suggestions for improvements;

- A number of respondents suggested a need to update Technical Advice Note (TAN) 14⁷ and 15⁸ to support land sea integration.
- A common theme was to ensure join up between the WNMP and the NDF.

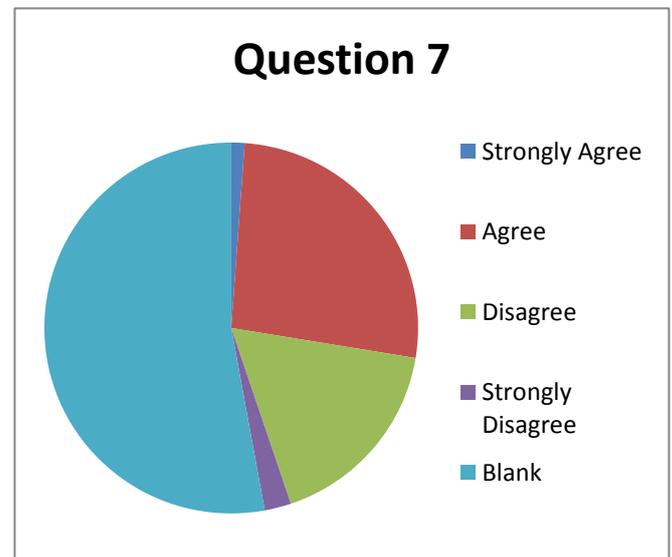
We will continue to work with terrestrial planning colleagues to help ensure common approaches and alignment between land use plans and the WNMP. We will explore the value of publishing guidance specifically on decision making in relation to projects where there is both a land use and marine planning context.

⁷ TAN 14: <https://gov.wales/topics/planning/policy/tans/tan14/?lang=en>

⁸ TAN 15: <https://gov.wales/topics/planning/policy/tans/tan15/?lang=en>

Question 7 - Do you agree that the WNMP sufficiently considers cross-border marine planning challenges and opportunities, particularly in areas where Wales adjoins England? If not, please give details below.

Summary of responses which selected options and those responses which did not indicate a conclusive option.		
Options	Number of respondents	Percentage
Strongly Agree	1	2.4%
Agree	23	56.1%
Disagree	15	36.6%
Strongly Disagree	2	4.9%
An additional 46 respondents did not indicate a conclusive view.		



Overall, respondents agreed that the draft plan sufficiently considered cross border challenges and opportunities, however some respondents disagreed that this was adequate in the draft.

The following comments were reflective of the views presented by the respondents of the dWNMP on cross border issues;

“... we acknowledge the difficulty in meaningful cross-border planning in this first iteration of marine planning across the UK, where timelines for planning different adjoining areas of sea have not been aligned.”

“... there is possibly more emphasis on interactions between Wales and England than between Wales and the Irish Republic. It could be argued that more detailed / joint Welsh / English Marine Plans for the upper parts of the Severn Estuary / Bristol Channel and for the areas around the Dee Estuary should have been produced.”

“Currently, we do not believe there has been enough consideration of cross-border issues within the Marine Plan and throughout the marine planning process.”

In summary:

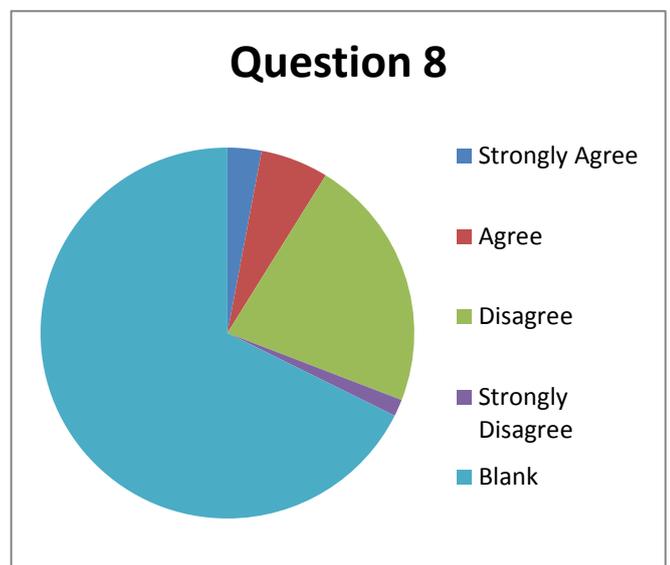
- It was generally acknowledged that joined up cross border planning is challenging when planning timescales do not align and there are no plans in England to take account of or align with.
- Respondents highlighted that natural systems do not respect planning boundaries and that both the north and south plan area boundaries are estuarine and therefore careful, joined up management is critical.

- Several respondents questioned how the plan can take an ecosystem approach if estuarine ecosystems are not planned for in an integrated and holistic way.
- A common point was raised over the benefit of alignment of data in neighbouring marine planning authority online planning portals.
- One respondent proposed a cross border advisory panel be established to support joined up planning.
- Respondents requested commitment to continued cross border working, particularly with the Marine Management Organisation (MMO) in relation to English marine plans as they develop.

As set out in the draft plan, we are committed to cross border working and collaboration. We will work with stakeholders to identify opportunities to provide greater clarity through policy implementation guidance as we settle the draft plan. We will consider the potential for a cross border advisory panel and explore opportunities to align relevant planning portals. We will continue to work closely with other marine planning authorities.

Question 8 - Do you agree that the general policy implementation guidance is fit for purpose? If not, how can it be improved?

Summary of responses which selected options and those responses which did not indicate a conclusive option.		
Options	Number of respondents	Percentage
Strongly Agree	2	9.1%
Agree	4	18.2%
Disagree	15	68.2%
Strongly Disagree	1	4.5%
An additional 46 respondents did not indicate a conclusive view.		



Only a third of respondents indicated a conclusive view in response to this question; however, the majority of those who did indicated they disagreed and provided a number of suggestions regarding areas for improvement.

The following comments and examples reflect the views provided by respondents in relation to whether the general policy implementation guidance is fit for purpose;

In summary:

- A number of respondents commented that guidance is required on 'weighing up the negative aspects on biodiversity (if there are any) against Blue Growth' and 'ensuring safeguarding' is strong enough' (see Question 2). This needs to be set in context of achieving and maintaining 'clean, safe, healthy and biologically diverse oceans and seas'.
- Some responses mentioned the need for further guidance on the linkages with terrestrial planning and raised the issue of local authority resource limitations.
- Some responses requested greater clarity on how the plan contributes to delivery of existing legislative mechanisms, e.g. good ecological / environmental status under the Water Framework Directive (WFD) and Marine Strategy Framework Directive (MSFD), Sustainable Management of Natural Resources (SMNR) under the Environment (Wales) Act; the goals of the Well-being of Future Generations (Wales) Act. With particular reference to the MSFD some respondents queried why the draft plan did not make explicit reference to all 11 descriptors.
- The possible positive and negative effects of marine development on land and the coast were raised with the suggestion of liaison with planners as part of implementation and additional monitoring to cover this.
- The need for effective cross border policy and implementation guidance was highlighted taking account of 'those parts of the Welsh marine plan area (especially the Severn and Dee) in which natural estuarine systems have been divided into different planning processes'.
- In general, respondents considered the implementation guidance for Strategic Resource Areas (SRAs) to be insufficient. Respondents called for greater guidance on how to consider/assess overlapping Marine Protected Area (MPA) and SRA areas in decision-making.
- Several respondents considered that throughout the plan further guidance is needed on how to apply SMNR principles, both in general and with regards to specific policies (e.g. GEN-02). Examples of comments relating to guidance around SMNR and application of related principles (including definitions) within implementation guidance included:

"Given that a significant number of decisions which will implement the plan will be made by NRW – which has a statutory purpose to pursue SMNR [...] – it is clear that the Plan's guidance must be coherent with that Welsh Government provide to NRW relating to Part 1 of the Environment (Wales) Act.

“Nowhere in the implementation guidance is Sustainable Development defined”

“We would like to see more guidance on when it may be appropriate to apply precaution vs proportionate”

- One respondent highlighted the importance for policies to focus on listed habitats and species as this then provides inherent focus / protection to supporting environmental features, so that general efforts to protect / enhance biodiversity can be better identified and targeted.

The following comments provide suggestions for amending or improving the guidance;

- A number of the responses suggested having separate documents to provide more detailed implementation guidance. This would allow the plan to be shorter and the level of information needed to demonstrate compliance with any given policy to be clearly indicated.
- Several members of the Stakeholder Reference Group responded highlighting the need to carry out the recommendations from the Task and Finish subgroup which considered implementation of the plan.
- Provision of *‘training/awareness raising amongst planners would be useful in endorsing and testing the robustness of the plan’*.
- According to a number of respondents, more guidance is required on weighing up the negative aspects on biodiversity (if there are any) against ‘Blue Growth’.
- Some responses mentioned the need for further guidance where development on land needs to consider the marine plan.
- The plan should repeat the need for necessary approvals such as when dealing with environmental designations and historic assets. Clarification on the position regarding Historic Landscapes that are not designated was requested.
- The current draft policy which encourages proposals that consider opportunities for coexistence with other compatible sectors should be accompanied by a further policy that requires demonstration of actions intended to do this.
- There were some positive comments on guidance, e.g. *“overall, it is an excellently prepared, well-balanced proposal”* but there were also requests for clarification, for example:

- *“It is positive to note that when a proposal has the potential to impact on commercial fishing or supporting areas the proposer is strongly encouraged to engage with relevant fisheries stakeholders at the earliest stages...However, there is no clear requirement for engagement when proposals affect species and habitats under FIS-03”.*

In view of these responses, we will consider ways the plan can be made shorter and clearer with the possible use of supplementary explanatory documents. We will ensure support on the implementation of the WNMP is an important aspect of work for the Welsh Government in advance of and after the plan has been adopted. We will continue discussion with other public authorities in Wales and other parts of the UK to learn from their experience of plan implementation and will work with stakeholders regarding how best to balance social, economic and environmental impacts of developments. Welsh Government is committed to maintaining an appropriate evidence base to support marine planning.

Question 9 - Do you have any comments or concerns about the sector supporting and safeguarding policies and implementation guidance? If you have concerns please explain.

There were 29 responses to this question. The dWNMP identifies supporting and safeguarding policies for the 11 listed sectors.

Many respondents offered comments in general support of the sector policy approaches taken. A number made suggestions to improve or clarify the content of sector narrative, clarify policy wording or intent, or identified aspects where sector implementation guidance would merit development (often supplementing answers given to Question 8). For example:

- In integrating general policies in permitting decisions on sector developments in line with their policies;
- Suggesting where definitions were required, e.g. on what constituted “exceptional circumstances” in a within or between sector context, or what was meant by “encourage”;
- In framing the safeguarding policy hierarchy and the level of support offered to pre-existing developments, those pending decision (e.g. exploration & options) and those that may be applied for - whether within or outwith SRAs.

In light of representations received in response to this question and others, we will review the structuring of sector safeguarding policies, refresh the content of sector narratives and review and further develop Implementation guidance.

Question 10 - Have we identified Strategic Resource Areas (SRA) for the right sectors and the appropriate areas? If not please specify which SRAs need amendment and provide clear evidence below.

There were 29 responses to this question. The majority of respondents did not provide a conclusive view. Of the respondents who did select an option 60% agreed that SRAs were identified for the right sectors and the appropriate areas. There were specific comments relating to the need for changes in the boundaries of SRAs including those for tidal range energy, aggregates, ports and shipping, aquaculture and wave energy. Several respondents highlighted the potential for cross-border effects of SRAs including those for ports and shipping, aquaculture, aggregates, tidal stream energy, tidal lagoon energy, and wave energy. There were many concerns about environmental constraints not having been considered in the identification of SRAs. Some respondents were supportive of the spatial element of SRAs, their function as a policy tool and their potential role in guiding evidence needs.

The following comments are reflective of the benefits of SRAs:

“SRAs bring a spatial element strengthening the planning aspect alongside policy. Appreciation that SRAs are a strategic tool, not intended to reflect site specific issues but to focus on strategic opportunities and challenges. They add value as an area-based policy tool to support marine planning by helping to signpost co-existence opportunities across sectors, so as to optimise use of marine space and unlock opportunities.”

“Strategic Resource Areas (SRAs) are a useful way of indicating where discrete areas of resource lie for future development of activities. This is demonstrated well for aggregates, wave energy, tidal stream and tidal range which are all limited spatially by adequate resource.”

“We therefore support the Welsh Government’s use of Strategic Resource Areas as a mechanism for appraising sector issues and steering evidence needs and evaluation, however we acknowledge the constraints that this approach presents. We recognise that our understanding of these SRAs will develop over time and this will need to be reviewed going forward.”

“The SRAs are an important tool to address the potential spatial implications of existing and future marine activities.”

*“as well as indicating where activities are likely to take place in the future, through their absence they [SRAs] also indicate where activities are **unlikely to occur**. From a scoping/screening perspective, this is really helpful for both developers and for regulators, and while it appears obvious we suspect that it is something that is often overlooked.*

“It is important to acknowledge that SRA’s are as much about supporting the continued operation of existing sectors, not just the identification of where growth may occur in the future”.

The following comments are reflective of views that focus on the need for evidence in relation to SRAs:

“As it currently stands, we object to areas of sea being ring-fenced as “good opportunities for future use” for the development of industry without considering environmental constraints. We disagree that SRAs “cannot fully reflect site specific, detailed considerations of opportunity and constraint, for example, aspects of designated conservation sites”.

“We consider that more evidence is needed to finalise Strategic Resource Areas. Resource areas will need to respond changes in technology. In some cases, it may make sense to develop joint resource areas with relevant parts of England.”

“... the Draft Plan states that Strategic Resource Areas cannot fully reflect site-specific detailed considerations ... I would like greater assurances within the final Plan that marine protected areas will not be undermined, but rather enhanced.”

“If SRAs are to be identified with a view to development, then their boundaries must be refined on the basis of environmental and socio-economic constraints. The refinement should also take into account other natural resources and uses of them and recognise the intrinsic value of resources.”

“Without recognition of Wales’ most important areas for wildlife, of which many areas are protected under European Legislation, it is unlikely that SRAs will provide more certainty and clarity for marine users on where best to place their activities. Equally, consent may not always be appropriate, and we feel that current implementation guidance may give a false impression to developers that it will be easier to gain consent for development within SRAs, regardless of their level of impact on wildlife.”

“We believe that constraints mapping (for example, a red-amber-green traffic light system) is necessary to provide much needed clarity for developers and regulators by providing an indication as to which areas within SRAs may be suitable or ultimately unsuitable to develop.”

The following comments relate to cross-border effects of SRAs:

“... any evolution of the SRAs during the lifetime of the plan need to be more clearly defined from the outset. There is also a need to carefully examine the potential cross-border compatibility of the sectors with SRAs.”

“Given the knowledge gap currently surrounding the potential impact of tidal energy developments, combined with the high level of support within the draft Welsh Marine Plan policies, this sector represents a significant risk to cross-border compatibility.”

The following comments highlighted inconsistency in how SRAs were identified and the language related to SRAs:

“...SRAs have not been identified in a consistent way.”

“For some industries, there is no SRA assigned to them e.g. tourism, fisheries, recreation and this has the potential to disadvantage them. In addition, spatial prescription can be used for more than just areas for blue growth.”

“...the Plan includes contradictory messaging leading to questions as to their purpose in a plan-led system.”

In summary:

- Several respondents supported the concept of SRAs and recognised that they could provide a useful planning tool and focus identification of evidence needs.
- Some respondents want SRAs to be identified for other sectors such as wind energy, fisheries, tourism and recreation, and ecosystems.
- In general respondents identified the need for further evidence in relation to SRAs, specifically that they should be defined based on environmental, social and economic constraints.
- Concerns were raised about the effect of SRAs and their associated policies on marine ecosystems and the Marine Protected Area network.
- The potential cross-border effects of SRAs were raised in relation to all SRAs and the need for proper appraisal of proposals was highlighted.
- Some respondents felt that there was inconsistency in the language used in relation to SRAs.
- Some comments provided specific details on how the boundaries of SRAs should be altered.

SRAs have received mixed views both strongly in support and against. We believe that they have value as a spatial planning tool. In light of representations received in response to this question and others, we will continue to work with stakeholders to refine the concept of SRAs and the evidence base to support them (including the commissioning of relevant studies).

Question 11 - Do you think the plan adequately identifies opportunities and priorities for blue growth? If not, please give details below.

There were 24 responses to this question. The dWNMP identifies growth opportunities for the marine sectors: renewable energy, tourism, recreation, ports & shipping and aquaculture. Respondents were in favour of this and did not identify any gaps.

However, many raised further sector specific comment, e.g.

- Aquaculture growth opportunities may be limited and below what some might expect.
- Offshore wind has the greatest potential.
- *“more could be done to support the growth of the sport and recreation sector (as well as for tourism)”*.

- *“heritage assets also have ‘social, economy and environmental value. It can be a powerful driver for economic growth, attracting investment and tourism and sustaining enjoyable and successful places in which to live and work.”*
- *“areas for future growth in the “blue” economy exist in science and innovation”.*

And some general comments:

- *“We are not convinced that the term “Blue Growth” is particularly helpful as it covers disparate industries some of which are well-established whilst others are at an early stage.”*
- *“A summary table or illustration of priorities and opportunities in the Blue Growth sector would be useful to ensure this message is clear.”*
- *“better alignment and coordination between the WNMP, National Development Framework and other policy areas such as the transport, infrastructure and energy could further support Blue Growth”.*
- *growth in one sector area will impact another, “... the priorities are understandably important, {but} consideration will be required of the potential impacts on other activities covered by the plan which may enable or support delivery.”*
- *“clarification that whatever marine development is proposed then there is economic, social and environmental and cultural benefit to the coastal communities”.*
- *“the plan is very generic and does not appear to identify any specific developments that should be prioritised to take forwards, unlike Local Development Plans which must highlight the priority development areas and types expected to be brought forwards to meet strategic needs.”*

Where comments were not in support, they often referred to the extent that the plan was “development” orientated and, in their view, did not adequately consider the environment, for example:

- *“concerns regarding the emphasis on blue growth in the plan, considers that this is too pro development and that the focus needs to be more on ecosystem condition and conservation.”*
- *“the blue growth section is rather too prominent and the plan is too pro-development. A careful balance between blue economy and marine conservation is required. Also, ecosystem enhancement is not addressed, but the main focus is on future new developments.”*

- *“that there is a trade off between Blue Growth and Good Environmental Status”*
- *“the potential growth areas are identified, but there is little indication of the contribution they are expected to make, the capacity of the environment and communities to accommodate this contribution, the potential conflicts between them, or which bring most benefits to Wales in terms of the well-being goals”.*
- *“the value of the marine ecosystems and the goods and services they provide needs to be better assessed”*

Some took a view that certain development activities were dependent on the marine environment:

- *“Blue Growth is likely to be unsustainable, supported by sector policies that risk undermining the long-term realisation of ecosystem resilience {without} greater emphasis on SMNR activities which enhance ecosystem resilience and natural capital than it currently does ... recognises that nature is a major contributor to the resilience of coastal communities given its central role in underpinning tourism, agriculture and fisheries.”*
- *“... without a restored marine environment, the potential for blue growth will remain significantly lower than could be the case. There is a need to consider the concept not in the short, but the long term.”*

Given the broad support for the approach, we intend to retain the overall structure and approach set out in the draft plan, however we will clarify the meaning of “blue growth” and we will work with stakeholders to ensure that the plan provides an appropriate framework for the sustainable use and development of the marine area.

Question 12 - Do you have any comments on Welsh Governments revised marine aggregates dredging policy and the proposed withdrawal of iMADP⁹? If so please give these below.

We received 15 responses. Most welcomed the review of marine aggregates policy in Wales and were in agreement with the proposed changes.

Some further clarification was sought, for example, on:

- the future standing of iMADP (i.e. whether retained for reference or abolished) and its role in future decision making.

⁹ Interim Marine Aggregates Dredging Policy (iMADP)

- the implications of, justification for and the determination and management of, the quantum of any Upper Severn estuary tonnage cap.
- the extent to which historic assets are adequately reflected in the licencing and monitoring regime and codes of practice applied.
- the content and hierarchical intent of the associated safeguarding policy.
- the standing of Codes of practice.

We intend to progress the review and replacement of iMADP through the development and implementation of the aggregate sector polices in the WNMP and to the same timescale for adoption.

Question 13 - Do you have any comments on the findings of the Sustainability Appraisal for the WNMP? If so, please give these below.

There were 15 comments received on the Sustainability Appraisal (SA) report were wide ranging, covering all aspects of the report including the methodology, findings of the appraisal, recommendations and monitoring proposals.

The following comments were reflective of the views presented by the respondents:

- A number of respondents commented on the methodology adopted for the SA including the scoping of cross-boundary effects, the definitions of significance, and the need for clarity on the environmental limits to the plan area.
- Several respondents also highlighted the need for the SA to consider a broader range of reasonable alternatives to the dWNMP for example; a high level national plan only, increased use of zoning and local / subnational plans underneath a national plan.
- The majority of responses received relating to the findings of the SA concerned the effects identified in respect of the tidal lagoon element of Policy ELC_01. These included queries on, for example;
 - the need to consider the effects of renewable energy development on the ports and shipping sector;
 - the prominence of effects of tidal lagoons in the context of Ecologically Coherent Networks of marine protected sites;
 - the extent to which some of the effects identified in respect of tidal lagoons may be significant (for example, in terms of salinity and increased water temperature) and/or uncertain given that the technology and the measures required to mitigate impacts are not well understood.
- Other comments relating to the findings of the SA concerned the need for greater consideration of: effects on landscapes and seascapes; effects of aquaculture on biodiversity and the effects on marine energy development if

located in the military Castlemartin and Manorbier Ministry of Defence (MoD) firing areas off the south coast of Pembrokeshire.

- Respondents generally agreed with the SA Report's recommendations including ensuring marine planning decisions are consistent with the SMNR principles and undertaking further research to resolve the uncertainties identified in the appraisal.
- A number of respondents felt that further work is required in respect of monitoring, taking into account the challenges of different reporting cycles, choice of monitoring indicators, practicalities and robustness of monitoring and roles and responsibilities.

In light of representations received in response to this question and others, we will review the SA and consider them in the redrafting of the WNMP.

Question 14 - Do you have any comments on the Habitats Regulations Assessment (HRA)? If so, please give these below.

There were 16 comments received on the Habitats Regulations Assessment (HRA) Report principally concerned the assessment's findings in terms of the tidal lagoon aspect of Policy ELC_01, alongside the assessment of alternative solutions, the case for Imperative Reasons for Overriding Public Interest (IROPI) and the compensatory measures identified.

The following comments were reflective of the views presented by the respondents:

- A number of respondents commented on the assessment of Policy ELC_01. Specifically the approach adopted to screening and the Zones of Influence adopted, the onus placed on project level assessment, the adequacy of the assessment of cross-boundary effects in English water and in-combination effects with a range of other infrastructure projects.
- One respondent also considered that the detailed appropriate assessments for fish, marine habitats, birds and mammals and the reported scale of adverse effects on the integrity of European sites is likely to be an underestimate, particularly given the potential magnitude of effects that may arise from multiple large lagoon developments.
- Some respondents felt that the assessment of alternative solutions to Policy ELC_01 had been scoped too narrowly and that a wider range of alternatives should be considered (including lower impact (and lower cost) alternative solutions to de-carbonise the economy and/or produce low carbon electricity). Some respondents also felt that several of the alternative solutions identified in the HRA Report would have a lower impact than the draft policy.

- Several respondents questioned the case for IROPI presented in Section 13 of the HRA Report given in particular the absence of detailed plans and evidence to support the energy case for tidal lagoons and the alternatives for de-carbonising Wales' electricity supply.
- Respondents generally felt that there is a need for a strategic approach to compensation whilst others highlighted that compensation for large scale tidal lagoons may be very difficult/not possible.
- One respondent also raised concerns in respect of the ports and shipping assessment.

In light of representations received in response to this question and others, we will review the HRA and consider them in the redrafting of the WNMP.

Question 15 - Do have any comments on the effects (whether positive or adverse) the introduction of the WNMP would have on opportunities for persons to use the Welsh language and on treating the Welsh language no less favourably than the English language?

The majority of respondents either did not indicate a conclusive view or had no comments. Of the five respondents who did comment some of these views are shown below.

The following comments and examples reflect the views provided by respondents in respect of the draft plan:

“We hope it will further encourage the use of the Welsh Language.”

“There is insufficient evidence at this strategic level to provide a response.”

“The WNMP will have no effect on Welsh Language requirements which should be dealt with through existing legislation (Wellbeing of Future Generations Act etc.) rather than unnecessarily included within an already overly duplicative plan.”

“There are some areas in which the provisions of this plan might support the Welsh language. One example would be where the fishing industry in coastal communities is supported, helping local people to remain in their home communities, which may have a strong Welsh-speaking element.”

The following comments provide suggestions for improvements;

- Consideration should *“be given to the production of a Welsh language version of the final version of the Welsh National Marine Plan, any summary sectoral briefing notes that are generated from it, and also to production of Welsh language versions of the standards and best practice guidance listed in our response ...”*

- Within the Marine Portal it would be useful to include spatial information on local linguistic profiles (categories as set out in WG Technical Advice Note (TAN) 20¹⁰) to inform decision making explicitly.
- Policy requirements in relation to the Welsh language need to ensure the extent and scope of evidence required from applicants is clearly expressed for example linguistic impact assessments.

As set out in the draft plan, we are committed to encouraging the promotion and facilitation of the use of the Welsh language and culture. We will work with stakeholders to identify opportunities to do this through policy and implementation guidance, and ensure documents are produced bilingually in line with the Welsh Language Standards.

Question 16 - Do have any comments on whether the proposals could be formulated or revised to have positive effects, or decreased adverse effects, on opportunities for persons to use the Welsh language and on treating the Welsh language no less favourably than the English language?

As with Question 15 the majority of respondents either did not indicate a conclusive view or had no comments. Of the three respondents who did comment, these views are shown below.

The following comments and examples reflect the views provided by respondents in respect of the draft plan:

“There is insufficient evidence at this strategic level to provide a response.”

“Integration with LDPs will be important for the Welsh language and the impact any proposals may have on communities”.

“... this is not an appropriate plan to include Welsh Language Requirements in, given existing legislation intended to directly address this issue for all development.”

“All proposals that adhere to the Marine Plan should include an acceptable methodology on how they’ll give positive effects for persons using the Welsh Language. The marine plan should also support proposals with example methods on how to do this.”

In view of the responses we will continue to work with stakeholders to identify opportunities to have positive effects or decreased adverse effects on opportunities for persons to use the Welsh language through policy and implementation guidance.

¹⁰ TAN 20: <https://gov.wales/topics/planning/policy/tans/planning-and-the-welsh-language/?lang=en>

6 Next Steps

- 6.1. The Welsh Government would like to thank all of those who provided feedback and who responded to the consultation for their time and contributions during the consultation period.
- 6.2. This Summary of Responses document provides a high-level overview of the responses received and our initial views on the responses.
- 6.3. Policy officials will consider the responses and discuss options to address any concerns that have been raised. We will also work with the Marine Planning Stakeholder Reference Group to consider how best to develop the final plan.
- 6.4. The Cabinet Secretary will publish a statement in the Autumn 2018 detailing how they intend to proceed with the WNMP.
- 6.5. The WNMP will be adopted when Welsh Ministers (with the agreement of the Secretary of State with regard to retained functions) decide to publish the plan.

The plan will be published as soon as reasonably practicable after its adoption along with statements of each of the following (Sec 15(7)):

- (a) any modifications that have been made to the proposals published in the consultation draft,
- (b) the reasons for those modifications,
- (c) if any recommendations made by any independent person appointed under paragraph 13 (MCAA) have not been implemented in the marine plan, the reasons why those recommendations have not been implemented.

Annex 1

List of respondents

12 individuals plus the following 74 organisations:

- Afonydd Cymru
- AM for Aberconwy
- Associated British Ports
- BirdWatch Ireland
- British Association Shooting and Conservation (BASC)
- British Marine Aggregate Producers Association (BMAPA)
- Carmarthenshire County Council
- Ceredigion County Council
- Challenge Wales
- Chartered Institution of Water and Environmental Management (CIWEM) Wales
- Conwy County Borough Council
- Department of Agriculture, Environment and Rural Affairs (DAERA NI)
- Department of Housing, Planning and Local Government, Eire
- Devon and Severn Inshore Fisheries and Conservation Authority
- Dyfed Archaeological Trust
- Ecotricity
- Energy Saving Trust
- Environmental Public Health Service in Wales
- European Subsea Cables Association
- Fishguard and Goodwick Chamber of Trade and Tourism
- Glamorgan-Gwent Archaeological Trust Ltd (GGAT)
- Gloucestershire County Council
- Inland Fisheries Ireland (IFI)
- Institute of Fisheries Management (IFM)
- Institution of Civil Engineers Wales
- Joint Nature Conservation Committee (JNCC)
- Ligue pour la Protection des Oiseaux (LPO)
- Marine Energy Wales
- Marine Conservation Society (MCS)
- Menai Strait Fishery Order Management Association (MSFOMA)
- Marine Management Organisation (MMO)
- National Federation of Fishermen's Organisations (NFFO)
- National Grid
- National Trust
- Natural England (NE)
- Neath Port Talbot County Borough Council
- Newport City Council
- North Pembrokeshire Transport Forum
- North West Coastal Forum
- Natural Resources Wales (NRW)
- Offshore Petroleum Regulator for Environment and Decommissioning, Department for Business, Energy and Industrial Strategy (OPRED, BEIS)

- Ørsted Power UK (Ltd)
- Pembrokeshire County Council
- Pembrokeshire Marine SACRAG
- Pembrokeshire Tourism
- Planning Policy, Places Strategy, Cheshire West and Chester Council
- Port of Milford Haven
- Ramblers Cymru
- Royal Commission on Ancient & Historical Monuments of Wales (RCAHMW)
- Royal Town Planning Inst (RTPI Cymru)
- Royal Yachting Association (RYA) and RYA Cymru Wales
- Royal Society for the Protection of Birds (RSPB)
- Scottish Government
- Seabed User and Developer Group (SUDG)
- Severn Estuary Partnership
- Snowdonia National Park Authority and Pembrokeshire Coast NPA
- South East Wales Strategic Planning Group (SEWSPG)
- South Gloucestershire Council
- Swansea Council
- The Bristol Port Company
- The Crown Estate
- The Institute of Marine Engineering, Science and Technology
- The Port of Mostyn Ltd
- Tidal Lagoon Power
- UK Chamber of Shipping
- University of St Andrews
- Wales Environment Link (WEL)
- Wave Hub Ltd
- Welsh Federation of Sea Anglers (WFSA)
- Welsh Ports Group
- Whale and Dolphin Conservation (WDC)
- Welsh Local Government Association (WLGA)
- WWF Cymru
- Youth Hostel Association (YHA)