

## Draft Northern Ireland Marine Position Paper

### Outcome of consultation

On the 2 March 2012, the Department of the Environment published the “*Consultation on draft Northern Ireland Marine Position Paper*”, which sought views from organisations and individuals who have an interest in the sustainable development of the Northern Ireland marine area.

The paper is intended to complement the UK wide Marine Policy Statement<sup>1</sup> which was adopted in March 2011, and identifies the policy context within which a Northern Ireland marine Plan will be developed. It also seeks to enhance the public’s understanding of the concept of marine planning.

It is intended that the final document will be a useful tool for marine stakeholders by providing a concise overview of the current policy and legislative framework pertaining to Northern Ireland’s seas.

The full text of the draft consultation paper is available on the department’s website at: [www.doeni.gov.uk/consultation\\_on\\_draft\\_marine\\_position\\_paper.pdf](http://www.doeni.gov.uk/consultation_on_draft_marine_position_paper.pdf)

### Engagement

The draft Marine Position Paper was prepared by the Department in conjunction with the other departments and public bodies which have responsibility for the sustainable development of Northern Ireland’s marine area including: DARD, DETI, DRD, DCAL, DSD and the Loughs Agency. This work was carried out through the Inter-departmental Marine Co-ordination Group (IMCG).

The consultation document requested responses on the following issues:

- Does the paper adequately deliver the objectives of:
  - (a) complementing the UK-wide Marine Policy Statement at a Northern Ireland level; and
  - (b) informing the public as to the proposed development of marine planning locally?
- Does the document contain a clear statement of policy objectives applicable at a Northern Ireland level for the sustainable use and management of the marine environment?
- Does the document contain an appropriate level of detail given the scope of issues?
- Are there any existing measures which you think are not outlined in the document and which should be included?

### Consultation Responses

A total of twenty four written responses to the consultation were received. This number included five nil returns. In general, respondents were supportive of the paper, and its objectives.

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<sup>1</sup> <http://www.defra.gov.uk/publications/files/pb3654-marine-policy-statement-110316.pdf>

The majority of points raised related to the last question (*Are there any existing measures which you think are not outlined in the document and which should be included?*); for this reason question 4 has forty five points linked to it.

Most respondents provided details of additional information they thought would be useful for inclusion within the paper. Others made comments on the process for producing marine plans and designating marine conservation zones; on the need for a participative approach to engagement; and on the value of using case studies and academic sources of information.

A synopsis of the key points made in the responses and the Department's position (including input where necessary from the other relevant departments) is set out in Annex 1. This has been structured so that the issues are listed in an order similar to that of the consultation document.

The comments received will be used by the Department (working with the Inter-departmental Co-ordination Marine Group) to inform the final version of the Northern Ireland Marine Position Paper, to be brought forward for publication later in the year.

## Marine Position Paper : Analysis of Consultation Responses

<b>Question 1(a)</b>	<b>Does the paper adequately deliver the objective of complementing the UK-wide Marine Policy Statement at a Northern Ireland level?</b>
<b>Respondent</b>	<b>Comment</b>
Ulster Wildlife Trust	The response accepts that the Marine Position Paper covers most of the information contained in the UK Marine Policy Statement and is more accessible to the wider public.
<b>Department's position:</b> The Department welcomes this comment.	

<b>Question 1(b)</b>	<b>Does the paper adequately deliver the objective of informing the public as to the proposed development of marine planning locally?</b>
<b>Respondent</b>	<b>Comment</b>
Consumer Council	Suggests that DOE should consider how they will best inform and promote the paper wider than publishing it on its website.
Marine Conservation NI	Comments that some stakeholders were informed of the consultation but the wider public remain somewhat in the dark.
Ulster Wildlife Trust	Notes that the document is reasonably easy to read for non-specialists and that it is useful to have key message boxes and well laid out, numbered paragraphs.
<b>Department's position:</b> The consultation was advertised widely in both the local press and on the DOE website, Section 75 groups and marine stakeholders were notified by letter and email and the paper was discussed at a stakeholder event on 16th March. The Department is aware of the need to reach a wider audience, within the constraints of trying to reduce running costs, including the costs of printing and also of its responsibilities to protect the natural environment. A limited number of hard copies of the final Marine Position Paper will be available and the paper will be placed on the Department's website. Consideration will also be given to opportunities to promote the paper and other marine issues to a wider audience.	

<b>Question 2</b>	<b>Does the document contain a clear statement of policy objectives applicable at a Northern Ireland level for the sustainable use and management of the marine environment?</b>
<b>Respondent</b>	<b>Comment</b>
CNCC/National Trust/Ulster Wildlife Trust	Suggests that the term "sustainable use" needs to be defined in relation to the Marine Position Paper at paragraph 1.4 and proposes using the Bruntland definition. Also expressed concerns that reference is made to the Executive's sustainable economic growth priority at paragraph 2.1 and that this is not the same thing as sustainable development.
NIMTF	Supports the point made by the UWT that the definition of sustainable development has been skewed towards economic values and proposes that the definition used in Australia's Environment Protection Biodiversity Act is used.
RTPI	Suggests that greater emphasis should be placed on economic development of the marine area and that there is scope for the Paper to place emphasis on a "profitable and efficient marine business" and "achieving a sustainable marine economy".
<b>Department's position:</b> The emphasis in the paper is on the sustainable development of the Northern Ireland marine area which includes sustainable economic development. The Department accepts that it would be useful to set out what is meant by the term "sustainable development ". A statement to the effect that sustainable development should be read in accordance with the new Sustainable Development Strategy "Everyone's Involved" will be included as a footnote to 1.4 and a link provided to the Strategy.	

<b>Question 3</b>	<b>Does the document contain an appropriate level of detail given the scope of the issues?</b>
<b>Respondent</b>	<b>Comment</b>
Ulster Wildlife Trust	Suggests that Chapter 1 contains the right level of detail for what is a complex situation with many interrelated factors.
<b>Department's position:</b> The Department welcomes this comment.	

Ulster Wildlife Trust	Suggests that a table of interactions between coastal activities, similar to that in Scotland's National Marine Plan: Pre-Consultation Draft is included.
<b>Department's position:</b> The purpose of the Marine Position Paper is to complement the UK Marine Policy Statement and to identify the policy context within which the Northern Ireland Marine Plan will be developed. The Marine Position Paper does not set the plan aim or objectives which have yet to be developed. Within this context, the interactions between existing and future marine activities will be determined through the marine plan preparation process. No change is proposed to the paper; the point has been noted for marine plan consideration.	
<b>Question 4</b>	<b>Are there any existing measures which you think are not outlined in the document and which could be included?</b>
<b>Respondent</b>	<b>Comment</b>
Ulster Wildlife Trust	Requests the removal of a reference to 50% of biodiversity in NI at paragraph 1.2 and provides suggested replacement text.
<b>Department's position:</b> More than half of Northern Ireland's biodiversity is in the sea. The Department will amend 1.2 accordingly.	
Ulster Wildlife Trust	Refers to paragraph 1.8 and notes that while DOE is responsible for the development of a marine plan, each individual Department will remain in control of its respective remit. Would also like information on how the Marine Plan will be run with the Marine Conservation Zone designation process within the Department.
<b>Department's position:</b> Noted. The MCZ designation process will be evidence based while also taking account of the socio-economic implications of designation. This process will help inform the marine plan preparation process, and plans will include designated or candidate MCZ areas and may include aims and objectives of such areas. It is anticipated that the Marine Plan will be published in 2014 and the Plan will reflect the position with MCZs at that time. It is important to note that development of marine plans and designation of MCZs will be an ongoing, evolving process, not a one-off activity. Co-ordination is already taking place, and will continue, between the marine plan and MCZ designation teams, and with other departments through the IMCG and bilaterally.	
Limavady Borough Council	Comments that NI's sea loughs should be named within the document.

<b>Department's position:</b> The Department accepts the proposal. Sea loughs will be referred to and a list included as a footnote to paragraph 1.9.	
National Trust	Proposes the inclusion of an explanation of why coastal access in NI was excluded from the Marine and Coastal Access Act 2009.
<b>Department's position:</b> During the development of the Marine & Coastal Access Act 2009, decisions were taken on the legislative requirements for each administration. This does not need to be explained with the Marine Position Paper.	
Ulster Wildlife Trust	Suggests some points included within the Marine Policy Statement should be included within the Marine Position Paper. These include the cumulative effects of the impact of activities as in pages 14-15 of the Marine Policy Statement and the requirement to use best available techniques. The response also suggests that "It would be useful to include and build upon the descriptors for GES with the understanding that these would be developed further in relation to the specifics of Northern Ireland's waters" as stated at page 17, 2.5.10 of the Marine Policy Statement).
<b>Department's position:</b> The Marine Policy Statement provides the high level policy context within which the Northern Ireland Marine Plan will be developed. The objective of the Marine Position Paper is to complement rather than replicate the Marine Policy Statement. Information on the state of Northern Ireland's seas in terms of the GES descriptors is contained within the Northern Ireland State of the Seas Report <a href="http://www.doeni.gov.uk/niea/water-home/state_of_the_seas_ni_report.htm">http://www.doeni.gov.uk/niea/water-home/state_of_the_seas_ni_report.htm</a> . No change proposed.	
CNCC/Ulster Wildlife Trust	Suggests that paragraph 2.11 should reference Annex 1 and provide clarity on who is responsible for the off-shore region. This should be supplemented by a flow chart or table to explain clearly how responsibilities are shared between the Departments at Annex 1.
<b>Department's position:</b> The Secretary of State (Environment) is responsible for implementing the Marine Strategy Framework Directive in the offshore region. A footnote to this effect will be inserted which will also explain that information on the responsibilities of Northern Ireland Departments in the offshore region is available at Annex 1. A table will be considered for inclusion in Annex 1.	
CNCC/Ulster Wildlife Trust	The comments on 2.11 further suggest that mention should be made of equivalent organisations in the UK and Ireland and that a diagram (copy provided) showing the different functions of each department and where they apply is included, which is linked to Chapter 4 and the key message table.

<p><b>Department's position:</b> The responsibilities of the Northern Ireland Departments in relation to the marine area are set out within the document and are summarised at Annex 1. The Department's view is that inclusion of a diagram and linkages and equivalents to other parts of the UK, as proposed, could make the situation appear more complex. No change to the Paper is proposed.</p>	
CNCC/Ulster Wildlife Trust	Comments on paragraph 2.16 - 2.18 suggest that the status and role of the Marine Position Paper should also be included in this section.
<p><b>Department's position:</b> The Marine Position Paper has no legal status and Department accepts that reference should be made to this. A statement to this effect will be included at 1.7. which sets out the objectives of the Paper but not repeated at paragraphs 2.16-2.18.</p>	
NFFO	Comments that thought should be given to developing the mechanisms for resolving conflicts among marine users.
<p><b>Department's position:</b> In accordance with the MPS, the Northern Ireland Marine Plan (when adopted) will seek to ensure that different and potentially competing activities are managed in a way that contributes to the achievement of sustainable development. A key principle will be to promote compatibility and reduce conflict.</p>	
Ulster Wildlife Trust	Requested information is included on how IMCG fits into the proposed structure for the marine planning system
<p><b>Department's position:</b> The proposed structure for the marine planning system in Northern Ireland is shown at Figure 1 (Page 7) of the draft Marine Position Paper. The IMCG was set up in recognition of the spread of marine functions across the relevant Northern Ireland departments, and is key in meeting the need for collaborative working on issues of mutual interest / concern such as the preparation of marine plans.</p>	
J Annett	Comments that the Paper should express the reality that NI waters will not have the capacity to deliver everything each industry would wish to achieve and there will be difficult decisions to take.

<p><b>Department's position:</b> In accordance with the MPS, the Northern Ireland Marine Plan will provide detailed policy and spatial guidance for Northern Ireland waters and help ensure that decisions within the plan area contribute to the delivery of UK, national and area specific policy objectives. The relative priority of activities in Northern Ireland waters and the capacity of our waters to accommodate growth in each sector will be determined through a sustainable approach to local marine planning processes, including consultation with the industries concerned, wider stakeholder engagement and in conjunction with relevant Northern Ireland departments with marine responsibilities.</p> <p>Marine Plans may however set limits or targets where appropriate, but should identify areas of constraint and locations where a range of activities may be accommodated. A new text box will be included within the MPP which will read: "<b>Marine Spatial Planning is a practical way to create and establish a more rational organisation of the use of marine space and the interactions between its uses, to balance demands for development with the need to protect marine ecosystems, and to achieve social and economic objectives in an open and planned way.</b>" (DEFRA 2008)</p>	
Ulster Wildlife Trust	Requested clarity on how the Marine Plan will be applied to other Departmental objectives.
<p><b>Department's position:</b> In accordance with the MPS, the NI Marine Plan will provide detailed policy and spatial guidance for NI waters and help ensure that decisions within the plan area contribute to the delivery of UK, national and area specific policy objectives. The relative priority of activities in NI waters and the capacity of our waters to accommodate growth in each sector will be determined through a sustainable approach to the local marine planning process, including consultation with the industries concerned, wider stakeholder engagement and in conjunction with relevant NI departments with marine responsibilities. DOE has a statutory obligation to consult with other relevant NI departments when preparing the marine plan. Whilst each Department retains policy control for its respective remit, the Marine Plan is seen as a driver to integrate their Departmental objectives. Departments will continue to work together through IMCG and bilaterally to achieve this.</p>	
CNCC/Ulster Wildlife Trust	Suggests that the approach to marine planning outlined at paragraph 2.20-2.23 is top-down approach, with no apparent input from stakeholders outside the government. The Science Community listed is all governmental and appears to exclude academics from NGOs and universities. This is at odds with the MPS which requires inter alia that the process is "participative and informed by data provided by consultees, stakeholders, regulators and relevant experts".

**Department's position:** Paragraphs 2.16-2.26 of the MPP sets out the inter-departmental approach to the structure of marine planning and production of marine plans in NI. The approach to stakeholder engagement in relation to the preparation of the NI Marine Plan, particularly those outside of government including academia and NGOs, is set out the Statement of Public Participation published in June 2012.

The following wording will be added after paragraph 2.23: **"The approach to broader stakeholder engagement in relation to the preparation of the NI Marine Plan is set out in the Statement of Public Participation published in June 2012. We will seek to work with and involve a wide variety of people including those who live and work near the sea, those who derive their livelihood from the sea, as well as those who enjoy it, care about it or manage it in some way. We will also work with a wide range of planning and regulatory organisations with direct and indirect involvement in marine planning. In this way, the plan will be informed by information and data from a wide range of sources including science advisors, statutory and other advisors, industry, marine users and the plan area community."**

CNCC/Ulster Wildlife Trust	Proposes the inclusion of a table at paragraphs 2.24-2.26 to compare strategies for Marine Planning and Marine Conservation Zones on the grounds that neighbouring countries are taking different approaches which may not lead to an ecologically coherent or consistent planning regime.
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**Department's position:** The Marine Policy Statement sets out the overarching policy context within which marine planning will be developed for the whole UK marine area. Each jurisdiction is taking a different approach to development of plans, as suitable for each region; however, consistency will be ensured through reference to the MPS and continuing engagement between marine plan authorities. Similarly, MCZs within the Northern Ireland inshore region will be based on sound science, and guided by principles developed on a UK-wide basis. As the Marine Position Paper aims to set out the position in Northern Ireland, it is not proposed to amend the paper on this point.

National Trust/Ulster Wildlife Trust	Commented that the Biodiversity duty on all government departments should be highlighted and included at 3.5 and that the biodiversity duty under the Wildlife and Natural Environment Act (2011) should be considered as a strategic driver at paragraphs 3.1 to 3.8.
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**Department's position:** Section 1 of the Wildlife and Natural Environment Act (Northern Ireland) 2011 places a general duty on public bodies in exercising their functions, "to further the conservation of biodiversity so far as is consistent with the proper exercise of those functions". A reference to this duty will be included at section 3.44 which introduces the concept of biologically diverse ecosystems.

Ulster Wildlife Trust	Requests information on how reserved functions such as Oil and Gas prospecting will fit into the NI Marine Plan.
<p><b>Department's position:</b> Within the context of marine plan preparation, matters pertaining to retained functions such as licensing for oil and gas prospecting in NI waters (DECC) and Defence / National Security (MoD) will be considered in accordance with the UK MPS. The Marine Plan team has established contact and will continue to liaise closely with the relevant UK Departments and agencies with responsibilities in Northern Ireland's marine area. DETI will also continue to liaise with DECC on these issues. Conclusion: No change proposed.</p>	
Ulster Wildlife Trust	Suggests that the figures cited in paragraphs 3.26 and 3.27 for the value of sea fisheries should be updated as 2010 data are available at <a href="http://www.marinemangement.org.uk/fisheries/statistics/annual.htm">http://www.marinemangement.org.uk/fisheries/statistics/annual.htm</a>
<p><b>Department's position:</b> DARD noted these comments and the Paper will be updated to read “<b>The total value of fish landed by Northern Ireland vessels in 2010 was over £35 million with aquaculture production adding an additional £10.8 million. This supports a fish-processing sector, mainly based around the East Down fishing ports which had a provisional estimated gross turnover in 2010 of £70.6m and employing an estimated 546 full time equivalents.</b>”</p>	
CNCC	Suggested that reference should be made at 3.31--33 on the issues around interceptory fishing.
<p><b>Department's position:</b> There will be no commercial fishing for salmon in the marine environment in 2012 as a result of a Ministerial call for a range of voluntary salmon conservation measures from both commercial fishermen and recreational anglers. DCAL is consulting on future salmon conservation measures. The consultation which is available at <a href="http://www.dcalni.gov.uk/salmon_conservation_consultation">http://www.dcalni.gov.uk/salmon_conservation_consultation</a> closes on 10 July.</p> <p>It would not be appropriate to pre-empt the results of the consultation by including a discussion on the issues associated with interceptory fishing within the Marine Position Paper.</p>	
Ulster Wildlife Trust	Suggests that the number of licences which have been issued and how many are in use should be provided and that "marine fish farms" should be replaced with "aquaculture sites" at paragraph 3.35

<p><b>Department's position:</b> DARD accepts the comment and the paper will be amended to read that “<b>There are currently 48 marine fish farms in Northern Ireland, covering 59 sites licensed by DARD for the cultivation of shellfish. There is also one salmon farm with licensed sites in Glenarm Bay and Red Bay. In Northern Ireland in 2010 the production of marine aquaculture species (salmon, blue mussels, native and Pacific oysters and scallops) was 12,236 tonnes with a first-hand sales value of £10.8m. The marine aquaculture sector employs 100 full time and 53 part time staff.</b>”</p>	
RTPI	Paper is silent on development of recreation around the shores of Lough Neagh.
<p><b>Department's position:</b> The Marine Position Paper identifies the policy context within which sustainable development of the marine environment, as opposed to the freshwater environment, will take place. No change proposed.</p>	
Ulster Wildlife Trust	Suggested that tourism and recreation would fit under multiple departments responsibilities and that the section needs to be clarified and extended.
<p><b>Department's position:</b> Responsibility for recreation is shared between a number of Northern Ireland Departments. To provide clarity the text will be amended to read “<b>DETI will maximise Northern Ireland's tourism potential in partnership with stakeholders from both the private and public sectors including DCAL, DARD and DSD.</b>”</p>	
Ulster Wildlife Trust	Suggests that a paragraph on how climate change will affect tourism should be inserted at 3.40 which could include information on an a potential increase of storm events, rising sea level, coastal squeeze and that iconic beaches and locations could be risk .
<p><b>Department's position:</b> Information on climate change is included at sections 3.85 to 3.89. This cross cutting issue has the potential to impact on the policies of the all Northern Ireland Departments with responsibilities in the marine environment. The Department will update 3.86 to the effect that “<b>the Climate Change Risk Assessment for Northern Ireland identified a range of climate risks across 11 sectors including Agriculture, Biodiversity and Ecosystem Services, Built Environment, Business including tourism, Industry and Services, Energy, Forestry, Floods &amp; Coastal Erosion, Health, Marine and Fisheries, Transport and Water. The Assessment indicates that increased flooding and coastal erosion affecting people, properties (including built heritage) and infrastructure: and increased coastal squeeze and coastal evolution affecting beaches, intertidal areas, grazing marshes etc. are potentially significant threats for Northern Ireland from a changing climate.</b>”</p>	
RTPI	Suggested that the Paper is relatively silent on the development of the recreation sector.

<b>Department's position:</b> The Department of Culture Arts and Leisure is content that the references to “Marine leisure” contained at paragraph 3.41 provide a substantive summary of the Department’s objectives for the sector. No change to the Paper is proposed.	
CNCC	Suggests that more detail is added to 3.44 on ecosystem services and biodiversity including threats, damage already inflicted and conflicts with other uses of the marine environment.
<b>Department's position:</b> Detailed information on biodiversity, the condition of the marine environment etc. is provided in the Northern Ireland State of the Seas report. Consideration will be given to including reference to that document in paragraph 3.44.	
CNCC/Ulster Wildlife Trust	Details of the new biodiversity strategy which is being prepared should be included at paragraph 3.44 along with how other policies fit into protecting the marine environment.
<b>Department's position:</b> The Department accepts the suggestion that information on the new biodiversity strategy is included within the Paper.	
CNCC/Ulster Wildlife Trust	Welcomes the recognition of the importance of marine biodiversity and marine ecosystem services. However suggests that further information needed about what this means at paragraph 3.44 and paragraphs 1.2 and 1.3 Additional explanation of the services delivered by the marine environment and its value to the economy needed. Suggests the use of case studies (from around the world if none in NI).
<b>Department's position:</b> The Department adopts an ecosystem management approach to ensure the marine area is managed sustainably. The principles upon which this is based are explained at page 24 of the UNESCO Guide to Marine Spatial Planning. These will be inserted after paragraph 3.44 along with a footnote to the document. Consideration will be given to the economic (and social) value of the marine environment during the marine plan process.	
CNCC/Limavady BC/National Trust/Ulster Wildlife Trust	Recommends the inclusion of the Giant's Causeway World Heritage Site at paragraph 3.47 and Annex 2 which extends into the sea along with AONBs and MNRs. Also suggests that this paragraph should state explicitly that the network of MPAs will include other sites (MCZs) that are additional to the existing designated sites and that equivalents in Ireland in shared sea loughs should also be provided.
<b>Department's position:</b> The Department accepts the proposal for the inclusion of a reference to the Giants Causeway World Heritage Site within the paper.	

CNCC/Ulster Wildlife Trust	Suggested that paragraph 3.47 state explicitly that the network of MPAs will include other sites (MCZs) that are additional to the existing designated sites. It is further suggested that it should be noted that a new Biodiversity Strategy is being prepared.
<b>Department's position:</b> Reference to MCZs will be included within paragraph 3.47. As noted above, reference to the new Biodiversity Strategy will be included within the document.	
CNCC/Ulster Wildlife Trust	Suggest that the EU Biodiversity Strategy which has similar goals to the Convention on Biodiversity is mentioned at 3.48.
<b>Department's position:</b> Further information will be included on biodiversity strategy developments.	
Ulster Wildlife Trust	Suggests that paragraph 3.57 should include how many and where the sea disposal sites for dredge disposal are located.
<b>Department's position:</b> Marine dredging and disposal is necessary for the purposes of navigation and existing and future port development and also to facilitate certain construction works. Dredging is a licensable activity under the Marine and Coastal Access Act 2009 and the process to determine licence applications, which is managed by NIEA, is open and transparent. The locations of dredge disposal sites are marked in Admiralty Charts. Paragraph 3.57 will be amended to read that details of the location of disposal sites are available from Admiralty Charts.	
CNCC	Proposed that paragraph 3.58 should be expanded to include the dredging of marinas whether for construction or maintenance by both mechanical and hydraulic means.
<b>Department's position:</b> The maintenance dredging protocol will provide assistance to operators and regulators seeking, or giving, approval for maintenance dredging. The focus of the Protocol will be commercial harbours which in certain circumstances, are exempted from the marine licensing requirements of the Marine and Coastal Access Act 2009. Once this project has been completed other bodies, such as marinas, may refer to the Protocol for information on best practice. These bodies will however continue to require a marine licence. A change to the Paper is not proposed.	
CNCC/Ulster Wildlife Trust	Suggests that paragraph 3.59 should also explain why there is currently no marine aggregate extraction in NI. The need for compatibility in planning regimes across the UK to ensure that NI's waters are not regarded as an easy option for aggregate extraction in a wider context is emphasised.

<p><b>Department's position:</b> It is not possible to fully explain the lack of aggregates extraction in Northern Ireland waters with any degree of certainty. However, as the industry is driven by market forces it is reasonable to assume that at present there is no economic imperative to establish the industry in Northern Ireland. The Department accepts the need for compatibility between UK planning regimes and believes sufficient statutory safeguards are contained within the Marine and Coastal Access Act 2009, the Marine Policy Statement and the Northern Ireland Marine Bill. No change to the Paper is therefore proposed.</p>	
RTPI	The risk of flooding in urban areas has not been given sufficient prominence.
<p><b>Department's position:</b> DARD Rivers Agency is satisfied with the content of paragraphs 3.71 to 3.76. No change to the Paper is therefore proposed.</p>	
CNCC	Suggests that section 3.75 could be expanded to include areas of land that are below the Mean High Water Mark and are maintained by pumping such as around the shores of Lough Foyle.
<p><b>Department's position:</b> Rivers Agency is content that the current wording covers the situation in Lough Foyle within the scope of the Marine Position Paper. No change to the Paper is proposed.</p>	
CNCC/Limavady BC/National Trust/Ulster Wildlife Trust	Recommends the inclusion of seascapes and the need to consider these at a strategic level in all coastal areas perhaps under the ICZM section. Link provided to ( <a href="http://www.ccght.org/publications-library">http://www.ccght.org/publications-library</a> ) which makes reference to seascape. The issue of seascapes is highlighted in section 2.6.5 of the UK MPS. In particular the need to consider at a strategic level, visual, cultural, historical and archaeological impacts in all coastal areas in conjunction with terrestrial planning authorities. This is especially relevant to nationally designated areas in the coastal region such as SAC, SPA, MNR, AONB etc
<p><b>Department's position:</b> The Marine Policy Statement provides the high level policy context within which the Northern Ireland Marine Plan will be developed and outlines the national policies for various issues, including seascapes. The Marine Position Paper seeks to complement the MPS, rather than replicate it. Further consideration will be given to this point.</p>	
NIRIG	Recommendation that the role that renewable energy can play in addressing climate change should be included in the climate change section.

<p><b>Department's position:</b> The Department will update 3.86 to the effect that the Climate Change Risk Assessment for Northern Ireland identified a range of climate risks across 11 sectors including Agriculture, Biodiversity and Ecosystem Services, Built Environment, Business, Industry and Services, Energy, Forestry, Floods &amp; Coastal Erosion, Health, Marine and Fisheries, Transport and Water. The Assessment indicates that increased flooding and coastal erosion affecting people, properties (including built heritage) and infrastructure: and increased coastal squeeze and coastal evolution affecting beaches, intertidal areas, grazing marshes etc. are potentially significant threats for Northern Ireland from a changing climate. Renewable energy's climate change mitigation benefit is already noted in 3.9.</p>	
CNCC/Ulster Wildlife Trust	Would like to see the inclusion of the concept of "Managed Retreat" at 3.90.
<p><b>Department's position:</b> Consideration will be given as to whether inclusion of this concept will provide greater clarity on the current position with regard to coastal change in Northern Ireland.</p>	
National Trust	Would like to see a greater commitment to improving and collecting data on coastal change and a greater commitment to collaborative working with academics.
<p><b>Department's position:</b> Noted. Greater collaborative working will be pursued as a range of marine issues, such as marine plan development, are being taken forward.</p>	
Ulster Wildlife Trust	Suggests that with the rise in sea levels the boundary between the marine and terrestrial environments (and legislations) will become less fixed. Planning systems need to take account of this by having much better integration between the Marine Plan and adjacent terrestrial plans and this should be reflected at paragraph 3.90.
<p><b>Department's position:</b> In preparing a marine plan, DOE has a legislative obligation under the MCAA 2009 and the proposed Marine Bill to ensure that the plan is compatible with any terrestrial plan which is related to the marine plan area. Also, the UK MPS sets out how integration of marine and terrestrial plans is to be achieved (Para. 1.3.4) 4.10 and 4.11 of the MPP sets out the NI equivalent for the terrestrial linkage. We will seek to work closely with Councils with marine boundaries now and new Councils created post the Review of Public Administration.</p>	
CNCC/Ulster Wildlife Trust	Suggests that the section on protection of the historic environment should include responsibilities for wrecks as these make an important contribution to social, economic and environmental factors in relation to the marine environment.
<p><b>Department's position:</b> In the section entitled "Protection of the historic environment", paragraph 3.94 refers to the protection of wrecks. The Department will amend the relevant Key Message on page 12 and the key Message text box on page 27 to reflect the protection of</p>	

wrecks.	
RTPI	Comments that the Paper does not make reference to the relevant Council authorities with coastal boundaries who will be responsible for planning decisions and Local Development Plans post RPA. The need for a close working relationship between the Departments responsible for marine planning and local authorities should be emphasised.
<b>Department's position:</b> The approach to stakeholder engagement in relation to the preparation of the Northern Ireland Marine Plan, including those Councils with coastal boundaries, is set out in the Statement of Public Participation published in June 2012. The relevant councils have however been informed of the commencement of the marine plan preparation process currently underway. The Marine Position Paper will be amended to refer to the Statement of Public Participation.	
CNCC/Ulster Wildlife Trust	Suggests that the list of interest features and biogenic reefs for Strangford Lough should be included at Annex 2.
<b>Department's position:</b> Inclusion of additional information will be considered, by way of reference to other documents / sources of information.	
Limavady Borough Council	Suggests that Magilligan Special Area of Conservation should be included within the list of sites provided at Annex 2.
<b>Department's position:</b> The Department accepts this suggestion and the Magilligan Area of Conservation will be included within the list of sites provided at Annex 2.	
Ulster Wildlife Trust	Suggests the inclusion of an additional annex 2A which lists the species protected within the NI marine environment such as the WANE 2011 Act along with the 18 species of animals listed as threatened species under OSPAR found in NI waters.
<b>Department's position:</b> Inclusion of additional information will be considered, by way of reference to other documents / sources of information.	
CNCC	Proposes adding the EU and UK Biodiversity Strategies to Annex 2 and the World Heritage Convention, the EU Biodiversity Strategy and the EU Resource Efficiency Strategy to Annex 3.
<b>Department's position:</b> The Department accepts these proposals and the paper will be updated accordingly.	