1. SUMMARY

1.1 The Marine (Scotland) Act introduces a new statutory marine planning system which aims to sustainably manage the increasing demands on Scotland’s seas. The Act provides for a National Marine Plan, powers to create Scottish Marine Regions and for the delegation of marine planning functions to a regional level.

1.2 This consultation sets out examples that currently exist for dividing the sea into regions, discusses possible approaches to identifying Scottish Marine Regions for marine planning purposes and seeks views on how the Government should create these regions. The full consultation document and interactive map can be viewed at http://scotland.gov.uk/Topics/marine/seamanagement/regional/Consultation

1.2 This report considers the key issues relative to the consultation and provides a response to the questions posed.

2. RECOMMENDATION

It is recommended that Members:

(i) Note the content of the report.
(ii) Approve Annex 1 of this report as the Council’s formal response to the Marine Scotland consultation on Scottish Marine Regions, subject to any additional comments Members wish to add.

3. INTRODUCTION AND BACKGROUND

3.1 The Marine (Scotland) Act introduces statutory marine planning for the first time in the Scottish marine area. The Act provides for a National Marine Plan and for the delegation of marine planning functions to a regional level. The Scottish Government’s intention is to delegate these functions to Marine Planning Partnerships which will be responsible for developing regional marine plans. The Marine (Scotland) Act provides that where these functions are delegated to a group, this should comprise stakeholders that represent a range of interests in that marine region, including public authorities, conservation, recreation and commercial interests.

3.2 National Marine Plan

The powers within the Marine (Scotland) Act extend from the Mean High Water Spring (MHWS) tide to the seaward limits of Scottish territorial waters (12nm). Executive devolution of marine planning, conservation, marine licensing and enforcement from 12-200nm through the UK Marine and Coastal Access Act allows Scottish Ministers to manage Scotland’s seas from 0-200nm. It is the intention that the National Marine Plan will extend from 0-200nm.

3.3 In addition to meeting national interests, the National Marine Plan will deliver international responsibilities such as the measures within the Marine Strategy Framework Directive. A UK Marine Policy Statement created and adopted by the UK and devolved administrations, will facilitate an integrated approach to marine planning right across the UK. This will guide the National Marine Plan, which in turn will guide the regional marine plans.
3.4 The National Marine Plan will provide direction on what Scotland wishes to achieve for the marine environment and in key areas such as renewable energy, fishing, aquaculture, conservation, recreation and tourism, ports and harbours and shipping etc. Nature conservation and historic designated sites will be clearly identified within the plan.

3.5 In preparation for a National Marine Plan, Scottish Ministers must set economic, social and marine ecosystem objectives, along with objectives relating to the mitigation of, and adaptation to, climate change. Scottish Ministers must also prepare an assessment of the condition of the Scottish marine area at the time of preparing the plan and a summary of the significant pressures and human impacts on the relevant area.

3.6 **Regional Planning**

The Marine (Scotland) Act provides powers for Ministers to create Scottish Marine Regions (SMRs) through secondary legislation and to delegate planning powers to the regional level. Ministers intend to delegate regional planning functions to Marine Planning Partnerships which will develop regional marine plans.

3.7 Marine Planning Partnerships will comprise representatives from a wide range of stakeholder interests, including public authorities and representatives that reflect the commercial, recreational and conservation interests of that region. The Marine Planning Partnerships will be required to create regional marine plans which will be appropriate for that area, taking into account the National Marine Plan and any specific directions from Ministers under sections 12-14 of the Marine (Scotland) Act.

3.8 Where Scottish Ministers agree to delegate regional marine planning responsibilities to the Partnership, Marine Scotland officers will support the work of the Marine Planning Partnerships by providing the necessary technical capacity either through funding or by using Marine Scotland’s planning resources. Marine Scotland will also initially provide a chairman for the Marine Planning Partnerships.

3.9 Marine planning will be the core function of the Marine Planning Partnerships involving stakeholder engagement, collection of data, preparation of plans, consulting on draft plans, reporting and review. The regional plans are likely to be more spatially detailed than the National Marine Plan reflecting the increased marine activity that often occurs in the coastal zones. Integrated Coastal Zone Management (ICZM) will also be a large part of the Planning Partnership role, recognising the potential interactions of coastal activities with both terrestrial and marine environments, and will require the integration of coastal and terrestrial planning and conflict resolution.

3.10 The Financial Memorandum to the Marine Scotland Bill sets out estimates of the costs associated with delivering SMRs and regional plans. The consultation document states that while estimates remain valid, in a period of public expenditure restraint savings may need to be made.

3.11 Marine Scotland has recognised that there is a need for some guidance on the governance of Marine Planning Partnerships and has asked the Scottish Coastal Forum to consider aspects related to the potential structures of Marine Planning Partnerships. The experience of the different models utilised by ICZM Coastal Partnerships may be a starting point for an assessment of the core elements that need to be consistent across Scottish Marine Regions.

3.12 Once SMRs are created the Marine Planning Partnerships will become fully operational and start the function of creating regional marine plans. Regional marine plans cannot be created until after the National Marine Plan is fully functional, which is expected to be during 2012. The Financial Memorandum to the Marine (Scotland) Bill based its estimates on the assumption that there would be 2 plans starting in each of 2012-13, 2013-14, 2014-15, 2015-16, 2016-17.
4. **EXISTING SPATIAL DESIGNATIONS IN THE MARINE AREA AROUND SCOTLAND**

4.1 The consultation document describes a number of existing International, EU and UK examples of dividing the seas into regions, including:

- Fisheries management areas;
- OSPAR Regions;
- JNCC Marine Nature Conservation Review;
- UK Marine Monitoring and Assessment Strategy;
- Inshore Fisheries Groups; and
- Local Coastal Partnerships and Regional Policy Areas.

5. **PREPARATORY WORK UNDERTAKEN BY SCOTTISH COASTAL FORUM**

5.1 Marine Scotland commissioned the Scottish Coastal Forum to carry out a short project in 2009 to establish external stakeholders views on the criteria by which SMR boundaries could be defined. A workshop for over 70 external stakeholders was held in March 2009 and was designed to allow interested parties from a range of different perspectives an opportunity to consider the criteria by which SMRs might eventually be defined. A comprehensive report on the workshop can be found at: [http://www.scotland.gov.uk/Resource/Doc/17888/0092157.pdf](http://www.scotland.gov.uk/Resource/Doc/17888/0092157.pdf)

5.2 A number of criteria for defining boundaries were considered with general support for physical characteristics, ecosystem drivers and existing administrative models as the most important. Stakeholders also recognised that regions should be of a size that is efficient for administration purposes but also offers local communities a sense of affinity and ownership of issues. The general view was that there should be between 5-10 regions, with 12 being the absolute maximum. This number would ensure that regions would be large enough to deal with strategic issues related to marine planning and achieving sustainable economic development, but would not be too small to get bogged down in highly specialised and localised issues.

6. **Seaward Limits of Scottish Marine Regions**

6.1 The Marine (Scotland) Act provides that the Mean High Water Spring tide mark (MHWS) forms the landward limit of any marine plan whether National or regional. The seaward boundaries for regional marine plans have not been defined and there are a number of considerations around how far out into the sea from MHWS is appropriate for a regional plan. The usual basis for any seaward measurement is the national baseline (as illustrated in Annex 2). Area Advisory Groups for River Basin Management Planning within the Water Framework Directive’s purposes extend out to a ‘baseline plus 3 nautical miles’ boundary and Inshore Fisheries Groups extend to ‘baseline plus 6 nautical miles’.

6.2 The consultation document discusses the options for the seaward limit of SMRs and seeks views on whether the seaward boundary should be measured from MHWS or from baseline. Views are also sought as to whether the regions should extend 3 or 6 nautical miles from either baseline or MHWS.

6.3 On the west coast, baselines and MHWS can be very different and the use of a baseline boundary would mean regions on the west coast planning for very large areas of sea. An alternative approach would be to use MHWS plus 3 nautical miles or 6 nautical miles. While the longer term vision is that marine regions will plan out to a baseline plus 3 nautical miles or 6 nautical miles, the consultation document asks whether this is a sensible approach for a first regional plan.
7. POSSIBLE APPROACHES TO IDENTIFYING SCOTTISH MARINE REGIONS

7.1 The consultation document focuses on three basic criteria for the identification of SMRs:
- physical/ecosystems characteristics;
- existing administrative models; and
- community affinity.

7.2 It describes the perfect region as; one with an identifiable physical/ecosystem base that broadly matched existing administrative boundaries in the area, was large enough to make a real difference while operating efficiently but was at a scale that generated community engagement. Clearly it will be difficult if not impossible to fully deliver this vision and any regionalisation will have to reflect tradeoffs between these issues.

7.3 Looking at physical characteristics alone (broad geography) Argyll and Bute could potential be split into two areas:
- Mull of Kintyre to Helensburgh as part of the larger Clyde Estuary; and
- The West Coast of Argyll north of the Mull of Kintyre.

7.4 When considering existing administrative boundaries, the marine/coastal area in Argyll and Bute is covered by two Area Advisory Group (AAG) areas for River Basin Planning and three Inshore Fisheries Group (IFG) areas. A recent review of IFGs by the Scottish Government has highlighted potential to reduce the number of IFGs around Scotland by increasing their size, which could lead to just two IFG areas covering Argyll and Bute.

7.5 When considering community affinity, the scale and boundary of a Region should offer local communities and stakeholders a sense of affinity and ownership of issues. It will also be necessary to consider the logistics of transport (distances and times) for stakeholders participating in meetings of the Marine Planning Partnership.

7.6 The consultation document asks for views on the practical implications of region boundaries not matching with other administrative boundaries and whether or not existing administrative boundaries should be aligned.

8. OPTIONS FOR DEFINING THE BOUNDARIES OF SCOTTISH MARINE REGIONS

8.1 The consultation documents sets out three options for defining the boundaries of SMRs and requests views on each option.

8.2 Option 1 Physical Characteristics
This option focuses purely on the use of physical characteristics to determine boundaries and identifies 10 regions (see Annex 3). The whole of the west coast from the Mull of Kintyre to Cape Wrath is identified as a single region and the Firth of Clyde as another, resulting in two regions covering Argyll and Bute.

8.3 Option 2 Existing Administrative Models
Under this option, Scottish Marine Regions could be created which would coincide with either the boundaries of IFGs or the AAGs for River Basin Planning. This would lead to 10 regions across Scotland if following the AAG boundaries and 12 regions if following the IFG areas (see Annex 4). For Argyll and Bute this would equate to two regions based on AAG boundaries and 3 regions based on IFG boundaries.

8.4 Option 3 Physical characteristics with the west coast split into 2 regions and the east coast boundaries varied
This option is similar to option 1 but may address the issue of a very large region on the west coast. This option creates an additional region on the west coast, broadly covering the Mull of Kintyre to the Sound of Mull. The boundaries of these regions could be created either using IFG, AAG or Local Authority boundaries, depending which was considered most
appropriate. In this option there would be 11 regions as illustrated in Annex 5, with two covering the Argyll and Bute administrative area.

9. ISSUES

9.1 Views on seaward boundary of SMRs

The consultation document identifies a preference for a seaward limit of 3 nautical miles from MHWS as a limit measured from baseline would encompass very large areas of sea on the west coast of Scotland. However, the additional sea area to the west of the Argyll coast is relatively small compared to that off the North West coast. Based on this and the fact that this limit would not encompass the full range of marine activities on the West coast, the Council considers that this seaward limit is not appropriate for regional plans.

While a seaward boundary of MHWS plus 3nm or 6nm may encompass most marine activities the boundary would not include all of the short term offshore wind sites in Argyll and Bute and would include none of the medium term options outlined in the Scottish Plan for Offshore Wind. This option is also unlikely to encompass much of the wave and tidal resource on the West coast of Scotland. A boundary of baseline to 6nm would encompass most of the potential development areas for marine renewable energy. It would also make sense for the seaward limit of SMRs to follow those of either the Inshore Fisheries Group or Area Advisory Group areas, which are 3 and 6 nautical miles from baseline respectively.

The Council’s preference for the seaward boundary of SMRs is therefore 6 nautical miles from baseline. If the seaward boundary was measured from MHWS then the seaward limit should be 6 nautical miles from MHWS rather than 3 nautical miles.

9.2 Integration with Council Plans and administrative boundary

It is critical that there is integration with terrestrial plans such as our Local Plan and this would be best achieved if SMRs accorded with our local authority boundary. Our response to the original consultation on the Scottish Marine Bill in 2009 stated that ‘It is important from Argyll and Bute Council’s perspective that SMRs have co-terminosity with our local authority boundaries’. None of the three options allow for the entire Argyll and Bute administrative area to be covered by a single SMR. All three options identify at least two regions covering the marine and coastal area Argyll and Bute.

However, there are also arguments for splitting Argyll and Bute so that the Firth of Clyde is managed as a single marine region. These arguments relate to the areas geography as a distinct body of water, high number of local authorities, established Firth of Clyde Forum which could act as a starting point for the development of a Marine Planning Partnership, and a published Marine Spatial Plan for the Firth of Clyde developed through the Clyde SSMEI project.

9.3 Assessment of Options for boundaries

Option 1 leads to the northern part of Argyll and Bute being encompassed in a SMR that covers most of the West coast. This scale of region is not likely to be effective, particularly in relation to stakeholder and community engagement, and unlikely to have a sense of affinity with regards to the area characteristics and issues.

Option 2 - In Argyll and Bute these boundaries do not currently match up, with the South West IFG and Clyde IFG boundaries meeting at the Mull of Kintyre and the Argyll and Clyde AAG boundaries meeting at the Kyles of Bute (see Annex 4). Alignment of boundaries could be achieved by changing the AAG boundaries to match the IFG boundary at the Mull of Kintyre. If the SMR covering the marine area north of the Mull of Kintyre aligned its northern boundary with the northern boundary of the Argyll and Lochaber AAG, this would lead to two SMRs covering Argyll and Bute.
Option 3 would improve the scale of regions on the West of Scotland but would still lead two regions for Argyll and Bute. If a region were to be defined from the Mull of Kintyre, north towards Mull, the northern boundary could follow a number of options, which include:

i. following the existing local authority boundary at the Sound of Mull;
ii. following the AAG boundary that stops at Ardnamurchan point; or
iii. using the southern boundary of the Mull & the Small Isles IFG (south coast of Mull).

The Council’s preferred option is to follow the existing local authority boundary as this makes administrative sense and simplifies involvement in the plan development process from local authorities.

10. **ARGYLL AND BUTE COUNCIL RESPONSE**

10.1 The proposed response to the individual questions outlined in the consultation paper is detailed in Annex 1 of this report.

11. **CONCLUSION**

The Marine (Scotland) Act introduces a new statutory marine planning system which aims to sustainably manage the increasing demands on Scotland’s seas. The Act provides for a National Marine Plan, powers to create Scottish Marine Regions and for the delegation of marine planning functions to a regional level.

Argyll and Bute Council recognise the importance of marine planning at the regional level to ensure sustainable use and management of our marine and coastal area and welcome the opportunity to comment on and influence options for determining the boundaries of Scottish Marine Regions. To maximise the efficiency of Marine Planning Partnerships and level of stakeholder involvement it is essential that SMR boundaries are at a geographic scale that makes sense to local communities and stakeholders and provides a sense of affinity and ownership of issues while trying to follow physical and ecosystem characteristics and existing administrative boundaries where possible.

12. **IMPLICATIONS**

**Legal:** None.

**Policy:**

The Council seeks through its Corporate policy, Structure Plan and Argyll and Bute Local Plan to support the sustainable management of our marine and coastal area. Consideration of the proposals for marine planning at a regional level assists the Council deliver its commitments for the environment and SOA local outcomes for the economy, communities and environment.

**Personnel:**

The Council’s involvement in regional marine planning as a representative of the Marine Planning Partnership for each region in our administrative area will require officer time in attending meetings, providing advice and bringing policy papers through the Council Committee process.

**Financial:** None.

**Equal Opportunities:** None.
Acronyms used in this report

- SMR – Scottish Marine Region
- AAG – Area Advisory Group
- IFG – Inshore Fisheries Group

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Full details on the consultation, can be viewed at http://scotland.gov.uk/Topics/marine/seamanagement/regional/Consultation
A hard copy of the document is available in the Members Room
Q1. Do you believe that Scottish Marine Regions should be created for the purposes of regional marine planning?
   Yes ☐   No ☐

The Council is concerned that some regions might start the process of developing a regional marine plan as late as 2016/17. Within the Argyll and Bute administrative area there are a number of pressing issues that need to be addressed now rather than later, including loss of biodiversity, threat from invasive non native species, conflict for use of space and the environmental effects of fishing, particularly trawling and dredging. While the Council welcomes work being undertaken through other existing management processes and the Government's proposed review of fishing in the Clyde, it is considered that the importance of the Firth of Clyde and the Argyll coast in terms of biodiversity and the wide range of social and economic marine activities that these areas support, warrants them being prioritised as the first regions to develop marine regional plans.

The consultation document states that the development of the first regional plans will take place in 2012/13 after the National Marine Plan has been completed. The Council considers that it would be possible to start the process of developing regional marine plans alongside the development of the National Marine Plan as it will take some time to set up the required Marine Planning Partnerships and gather the relevant information and data needed to form the evidence base for a regional plan.

The Council would welcome any opportunity for discussion of these issues with Marine Scotland.

Q2. Do you agree that for the first regional plans for those regions with large amounts of internal seas, the seaward boundary should be measured from MHWS? For subsequent plans a baseline boundary should be used.
   Yes ☐   No ☐

The consultation document identifies a preference for a seaward limit of 3 nautical miles from MHWS as a limit measured from baseline would encompass very large areas of sea on the west coast of Scotland. However, the additional sea area to the west of the Argyll coast is relatively small compared to that off the North West coast. Based on this and the fact that this limit would not encompass the full range of marine activities on the West coast, the Council considers that this seaward limit is not appropriate for regional plans.

While a seaward boundary of MHWS plus 3nm or 6nm may encompass most marine activities the boundary would not include all of the short term offshore wind sites in Argyll and Bute and would include none of the medium term options outlined in the Scottish Plan for Offshore Wind. This option is also unlikely to encompass much of the wave and tidal resource on the West coast of Scotland. A boundary of baseline to 6nm would encompass most of the potential development areas for marine renewable energy. It would also make sense for the seaward limit of SMRs to follow those of either the Inshore Fisheries Group or Area Advisory Group areas, which are 3 and 6 nautical miles from baseline respectively.

The Council's preference for the seaward boundary of SMRs is therefore 6 nautical miles from baseline. If the seaward boundary was measured from MHWS then the seaward limit should be 6 nautical miles from MHWS rather than 3 nautical miles.
Q3. The seaward limit of the Scottish Marine Regions boundaries within the west coast internal waters should be from MHWS to - (tick your preferred choice).

3nm  [ ]  6nm  [ ]  See comments above

Q4. At least initially, planning for Strategic Sea Areas not included within a Scottish Marine Region should be undertaken within the National Marine Plan.

Yes  [ ]  No  [ ]

The Council considers that the mouth of the Clyde would be better considered as part of a Scottish Marine Region for the whole of the Firth of Clyde rather than as a Strategic Sea Area within the National Plan. If the seaward limit of SMRs on the west coast is taken from MHWS then the mouth of the Clyde will need to be considered in detail in the National Marine Plan.

Q5. What are the practical implications of any of the marine boundaries not being aligned?

Not aligning SMR boundaries with local authority boundaries potentially makes integration of regional marine plans with local authority terrestrial plans more difficult. The more SMRs covering a local authorities administrative area the more resources will be required by the authority for involvement in regional planning. While integration with terrestrial planning would be best achieved if SMRs accorded with local authority boundaries the Council recognises the importance of SMRs being a geographically coherent area and the benefit in aligning where possible with other marine boundaries including those of Inshore Fisheries Groups and Area Advisory Groups.

In this respect there are good reasons for splitting Argyll and Bute so that the Firth of Clyde is managed as a single marine region. These relate to the areas geography, high number of local authorities, established Firth of Clyde Forum which could act as a starting point for the development of a Marine Planning Partnership, and a published Marine Spatial Plan for the Firth of Clyde developed through the Clyde SSMEI project.

Having lots of different marine boundaries makes integration of existing marine and coastal management processes more difficult and potentially more confusing for stakeholders.

Q6. Should we align all marine boundaries?

Yes  [ ]  No  [ ]

While it would not be possible to align all local authority, IFG and AAG boundaries, the Council considers that marine boundaries should be aligned where appropriate. There is potential to align some AAG and IFG boundaries and match these with SMR boundaries. In Argyll and Bute the southern boundary of the Argyll and Lochaber AAG could be aligned with the southern boundary of the South West IFG. Further amalgamation of the South West and Mull & the Small Isles IFG could lead to further simplification and co-terminosity of SMR, IFG and AAG boundaries covering the Argyll and Bute administrative area.

Q7 Do you support option 1?

Yes  [ ]  No  [ ]

While focussing only on physical/ecosystem characteristics may be appropriate for some parts of the Scottish coast the Council considers that it is not appropriate for the West coast of Scotland.

Option 1 leads to the northern part of Argyll and Bute being encompassed in a SMR that covers the West coast from the Mull of Kintyre to Cape Wrath. This large scale of region is not likely to be effective, particularly in relation to stakeholder and community engagement, and unlikely to have a sense of affinity with regards to the area characteristics and issues.
Q8. Do you support option 2?

Yes ☐ No ☐

If you support option 2 do you wish SMR boundaries to be aligned with the boundaries established for:

IFG ☐ or ☐ AAG ☐

What do you believe are the benefits of option 2 over 1 and 3?

It is difficult to comment on option 2 as the consultation document identifies that the boundaries of IFGs may change, resulting in fewer larger IFG areas. The Council is supportive of aligning SMR boundaries to both IFG and AAG areas where appropriate.

In Argyll and Bute the AAG and IFG boundaries do not currently match up, with the South West IFG and Clyde IFG boundaries meeting at the Mull of Kintyre and the Argyll and Clyde AAG boundaries meeting at the Kyles of Bute (see Annex 4). Alignment of boundaries could be achieved by changing the AAG boundary to match the IFG boundary at the Mull of Kintyre. If the SMR covering the marine area north of the Mull of Kintyre aligned its northern boundary with the northern boundary of the Argyll and Lochaber AAG, this would lead to two SMRs covering Argyll and Bute.

Focussing on the marine and coastal area within Argyll and Bute, option 2 is more appropriate than option 1. Option 2 could provide similar outcomes to option 3 in Argyll and Bute, but option 3 provides an option for SMR boundaries to align with local authority boundaries, which is welcomed by the Council.

Q9. Do you support option 3?

Yes ☐ No ☐

Do you have any views on how the west coast should be split? (tick your preferred choice)

X should align with IFG ☐
X should align with AAG ☐
X should align with LA ☐

Do you have any views on how the east coast should be split? (tick your preferred choice)

Y should align with AAG ☐
Y should align with IFG/LA ☐

Option 3 is the preferred option for Argyll and Bute Council which would improve the scale of regions on the West of Scotland and lead two regions covering our administrative area. We consider that the West coast of Scotland between the Mull of Kintyre and Cape Wrath should be split into at least two regions and that the boundaries of these regions should align where appropriate with existing local authority, IFG and AAG boundaries. We also consider that our marine area from the Mull of Kintyre to Helensburgh would be best included in a SMR covering the whole of the Firth of Clyde, matching the current boundary of the Clyde IFG.

The boundary between Argyll and Bute and Highland Council runs north of Coll and Tiree through the middle of the Sound of Mull and cuts across the southern end of Loch Linnhe. While using this boundary to define an SMR does split bodies of water, this boundary would make administrative sense and simplify local authority input to the development of a regional marine plan. Cross-border working will be required across all boundaries between adjacent marine regions and the Council recognises that this approach would require careful cross-boundary working between Highland and Argyll and Bute Council for the Sound of Mull and Loch Linnhe.
The Council has been lead partner in the Sound of Mull SSMEI project which developed a non-statutory marine spatial plan for the Sound of Mull which has been adopted by the Council as Supplementary Planning Guidance. While this project identified the need for this body of water to be managed as a single unit, the Council considers that this plan could still be used as a local level plan sitting below two less detailed statutory marine plans covering each side of the Sound.

Following the AAG boundary that stops at Ardnamurchan point would encompass all of Argyll and Bute’s marine waters north of the Mull of Kintyre and although it might provide a more geographically coherent marine area, this option would however lead to Highland Councils administrative area being covered by an additional SMR and an additional local authority being involved in this region.

The Council is not supportive of using the southern boundary of the Mull & the Small Isles IFG as this would mean that our administrative area would be split over at least three SMRs which would not make administrative sense.

Q10. Do you believe that the creation of Scottish Marine Regions discriminates disproportionately between persons defined by age, disability, sexual orientation, gender, race and religion and belief?

Yes ☐ No ☒

Q11. If you answered yes to Question 10 in what way do you believe that the creation of Scottish Marine Regions is discriminatory?

None
Annex 4  Area Advisory Group (AAG) and Inshore Fishery Group (IFG) boundaries
Annex 5  Physical characteristics and West/East coast divisions