



Llywodraeth Cymru
Welsh Government

Summary of Changes to the Draft Welsh National Marine Plan

Welsh National Marine Plan

November 2019

Contents

Introduction	1
Purpose of this report	1
Post consultation engagement	2
Key themes emerging from the consultation	2
Table 1: Key themes	4
Modifications made to the WNMP by section	8
Table 2: WNMP Vision and Objectives	8
Table 3: WNMP General Policies	10
Table 4: Strategic Resource Areas	14
Table 5: WNMP Sector Policies – Sector Objectives	16
Table 6: WNMP Sector Policies – Supporting Policy	18
Table 7: WNMP Sector Policies – Safeguarding Policy	23
No changes by section	24
Table 8: Overarching Issues	24
Table 9: WMMP Vision and Objectives	26
Table 10: WNMP General Policies	28
Table 11: WNMP Sector Policies	32

Introduction

1. The Welsh National Marine Plan (WNMP) provides an overarching framework to guide the sustainable development of Welsh seas. It has been prepared and adopted under the Marine and Coastal Access Act 2009¹ (MCAA) 2009 and in conformity with the UK Marine Policy Statement (MPS)².

2. Public consultation on the draft WNMP was launched on 7 December 2017 and closed on 29 March 2018. A Summary of Responses³ to the consultation was published in July 2018, analysing and setting out the key themes to emerge

from the consultation responses, together with the stakeholder engagement undertaken as part of the consultation. The National Assembly for Wales's Climate Change, Environment and Rural Affairs Committee also took evidence on marine planning on 1 February 2018 and held a stakeholder workshop to discuss the draft WNMP on 14 March 2018. The Committee made 13 recommendations on the draft WNMP in April 2018⁴, to which the Cabinet Secretary for Energy, Planning and Rural Affairs responded on 12 June 2018⁵.

Purpose of this report

3. In accordance with the MCAA (Schedule 6, Section 15(7)), the Welsh Government is required to publish a statement alongside the adopted WNMP setting out modifications made to the consultation draft and the reasons for these modifications.

This report sets out:

- a summary of stakeholder consultation comments relating to the draft WNMP
- an overview of changes made to the WNMP in response to these comments and
- an overview of changes suggested but not deemed appropriate, together with the reasons for this.

1 www.legislation.gov.uk/ukpga/2009/23/contents

2 assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69322/pb3654-marine-policy-statement-110316.pdf

3 gov.wales/sites/default/files/consultations/2018-07/draft-welsh-national-marine-plan-summary-of-responses.pdf

4 www.assembly.wales/laid%20documents/cr-ld11543/cr-ld11543-e.pdf

5 www.assembly.wales/laid%20documents/gen-ld11609/gen-ld11609-e.pdf

Post consultation engagement

4. Following the public consultation, workshops were held with members of the Marine Planning Stakeholder Reference Group (MPSRG) between May and September 2018 to consider key issues emerging from the consultation responses.

Issues considered were:

- plan structure and content
- Sustainable Development and Sustainable Management of Natural Resources (SMNR)
- Strategic Resource Areas (SRAs)
- cross border management; and
- evidence.

5. A Marine Planning Tidal Lagoon Sustainability Appraisal and Habitats Regulation Assessment Technical Group was also established to address consultation responses received in relation to proposed tidal range (tidal lagoon) policy in the draft WNMP. This group met four times between September 2018 and January 2019.

6. Two meetings of the MPSRG were held in December 2018 and January 2019 to consider the re-drafted WNMP and the changes made. Discussions were held with policy officials in both the Welsh and UK Governments throughout the re-drafting process to inform considerations of key issues raised by the consultation responses in finalising the WNMP.

Key themes emerging from the consultation

7. Overall, respondents welcomed the draft WNMP. As the first such plan for the Welsh seas, it was recognised as representing a significant step forward in the provision of strategic planning for the Welsh marine environment. There was also recognition of the extent of work involved in developing the draft WNMP and the degree of data and information underpinning the plan and respondents were supportive of the Wales Marine Planning Portal.

8. In addition to detailed comments relating to individual draft WNMP policies, a number of key themes emerged from the consultation responses.

Plan structure:

9. While broadly welcoming the format of the draft WNMP and its provision of implementation guidance, respondents felt that the length and complexity of the plan could impact on usability. It was suggested that the draft WNMP be re-structured to transfer guidance and contextual material to annexes

and/or supplementary documents and that further clarity be provided on the interaction between plan policies. Further detail, together with a summary of actions taken to address these issues, can be found in Table 1.

Sustainable Development:

10. Respondents welcomed the draft WNMP's commitment to supporting the achievement of Good Environmental Status (GES) and the strong links the plan makes to an ecosystem approach. They also expressed support for the commitment to protect and enhance marine biodiversity and ecosystem resilience. However, respondents raised a number of issues in relation to the draft WNMP's approach to sustainable development and the balance between the three pillars of sustainability (environment, society, economy) and felt that there should be clearer application of the requirements of the Environment Act (Wales) 2016, in particular

SMNR. Further detail, together with a summary of actions taken to address these issues, can be found in Table 1.

Strategic Resource Areas (SRAs):

11. Respondents welcomed the intent of providing spatial direction in the draft WNMP however, some concerns were raised regarding a number of aspects in relation to SRAs, including:

- a lack of clarity on the purpose of and role of SRAs in decision making
- that proposed SRAs support sector growth while not yet being underpinned by comprehensive evidence on environmental constraints
- that there are some inconsistencies in the methodology for and approach to identifying and defining proposed SRA boundaries and
- that there should be opportunity for appropriate stakeholder engagement to support the identification and development of SRAs.

12. Further detail, together with a summary of actions taken to address these issues, can be found in Table 4.

Policy on tidal lagoon development:

13. While supportive of policy to encourage low carbon energy, respondents expressed significant concern at draft WNMP policy on tidal lagoons and its support for large-scale lagoon development alongside the HRA findings that it could not be concluded that such policy would not result in adverse effects on the integrity of European Site(s). Respondents also noted that such development is likely to result in impacts and cumulative effects extending across national, marine planning and land/sea borders and felt that the draft WNMP should address these issues more clearly. Further detail, together with a summary of actions taken to address these issues, can be found in Table 6.

Cross border management:

14. Respondents noted the importance of clear policy direction on cross border coherence, particularly given the shared estuarine waters of the Severn and Dee, and noted the lack of a dedicated policy on cross-border collaboration and Integrated Coastal Zone Management (ICZM). Tables 1 and 3 give further detail of actions taken to address these issues.

Evidence, monitoring and reporting:

15. Respondents noted the importance of evidence to inform decision making and requested further clarity on provisions for monitoring and reporting achievement against the WNMP's objectives. Welsh Government has published a Monitoring and Reporting Framework alongside the adopted WNMP. While a programme of marine evidence collection is outside the direct scope of the WNMP, an update to the Wales Marine Evidence Report is published alongside the WNMP and Welsh Government is developing a Marine and Fisheries Evidence Strategy.

Table 1: Key themes

Stakeholder comment summary	Resulting change made
The Structure of the WNMP	
<p>The draft WNMP is extremely long. Elements of supporting and contextual information could be moved to appendices, reducing the length of the plan and increasing its usability.</p> <p>Including technical and detailed implementation guidance within the draft WNMP results in this guidance being labelled as policy, creating confusion between the status of this guidance and actual WNMP policies. This guidance would sit better in supplementary document(s) which can be updated more flexibly, enabling the WNMP to be more streamlined and user-friendly.</p>	<p>The WNMP has been re-focused on the core vision, objectives and policies. Plan policies are supported by sharper and more concise policy narratives. Supporting technical and guidance material has transferred to separate Implementation Guidance and other supplementary guidance documents. The WNMP Introduction clarifies the status of the Implementation Guidance as a relevant consideration in decision making.</p> <p>Safeguarding policy has been streamlined by replacing individual Sector Safeguarding Policies (for sectors other than Defence) with Common Safeguarding Policy. Narrative on the legislative and policy context for marine planning, on the marine planning process and on integration with other planning processes has been transferred to Annex 1 to the WNMP.</p>
Policy Coherence	
<p>It is unclear how plan policies interact with one another and which policies have priority in the event of a conflict; for example, between General and Sector policies.</p>	<p>Further clarity has been added to the WNMP confirming all policies apply equally, with no policy hierarchy. Policies GEN_01 and GEN_02 are no longer described as overarching.</p> <p>A table has been added to the Introduction showing the alignment of the General and Sector Policies to the Plan Objectives. The wording of the Sector Supporting Policies has been revised to explicitly reference the requirement to align with the General Policies. There was no support from MPSRG members for the inclusion of a table detailing the alignment between General and Sector Policies.</p>
<p>There is some inconsistency in wording between different policies which risks inadvertently creating a policy hierarchy.</p>	<p>The wording of individual policies has been reviewed and consistent terminology introduced where required.</p>

Stakeholder comment summary	Resulting change made
<p>Where policies are framed to provide general encouragement for specific types of proposals, there is lack of clarity on what is meant by the term 'encourage'.</p>	<p>Where relevant, the wording of General Policies has been revised to set out requirements for proposals to demonstrate how they have addressed considerations relevant to the policy aim. Some positively worded policy direction has been retained to enable the WNMP to function as a positive planning framework.</p> <p>The wording of the Sector Supporting Policies has been revised to state that proposals which contribute to and comply with WNMP objectives and policy will be supported.</p> <p>General and Sector Policies are supported by a narrative on the key aims and underpinning principles.</p>

Sustainable Development	
<p>There is a need to better balance and integrate the three pillars of Sustainable Development (social, economic and environmental). The draft WNMP currently places greater emphasis on the growth of the marine economy than on ensuring ecosystem resilience and sustainably managing natural resources. Sector Supporting Policies focus on economic growth and could undermine plan objectives on restoring ecosystem resilience. Policy expressing support for large scale tidal lagoon infrastructure has significant potential to result in adverse impacts on protected sites and species. SRAs are not yet underpinned by a consideration of environmental constraints or sensitivities.</p>	<p>The WNMP's policies have been developed to work together, with General cross cutting Policies and Sector Policies coming together to collectively support sustainable development. This is clearly stated in the WNMP and the wording of the Sector Supporting Policies has been revised to signal the requirement to align with the Plan Objectives and General Policies.</p> <p>The WNMP now makes clearer reference to the intrinsic value of the marine environment and marine ecosystems. References to prioritising investment, innovation and growth have been removed from the narrative accompanying policy GEN_01. Policy ENV_01 on resilient marine ecosystems has been strengthened to require consideration of potential adverse impacts, alongside encouraging positive benefits.</p> <p>Specific sector growth targets have been removed. Tidal lagoon policy has been refocused on a stepwise approach to supporting the sector, including developing evidence to allow for greater understanding of future opportunities.</p> <p>The link between SRAs and Sector Supporting Policy has been removed, with SRAs refocused as a tool to safeguard future potential sustainable resource use. The WNMP sets the criteria to be considered when developing SRAs, which include environmental constraints and opportunities. Clarification that SRAs will not unduly hinder the designation of MPAs to ensure an appropriate contribution to a coherent MPA network has been added to the policy narrative.</p>

Stakeholder comment summary	Resulting change made
<p>To align with the principles of the Wellbeing of Future Generations Act (WFGA), the terms “maximising growth” and “sustainable growth” should not be used; “sustainable development” should be consistently referenced. A definition of Blue Growth should be provided.</p>	<p>The text throughout the WNMP has been refined, with references to maximising growth or encouraging sustainable growth removed and consistent referencing of sustainable development included.</p> <p>A definition of Blue Growth has been provided, based upon economic growth and development which supports social equity while ensuring natural assets can continue to provide the resources and environmental benefits on which well-being relies. This definition was agreed with the MPSRG.</p>
<p>Good Environmental Status (GES)</p>	
<p>Some policies appear to be mistakenly attributed to certain GES Descriptors.</p> <p>The WNMP doesn't appear to have any policies relating to seabed integrity or alteration of hydrographical conditions.</p>	<p>Additional narrative has been incorporated to more clearly set out the nature of the WNMP's support for achieving GES and the means by which GES Descriptors are addressed by the WNMP and its policies.</p> <p>Narrative has been added into Table 5 setting out the nature of the WNMP support to achieving each GES Descriptor and describing how WNMP policies contribute to the achievement of that Descriptor. This includes clarity on the policies contributing to the achievement of the Descriptors on seabed integrity and alteration of hydrographical conditions.</p> <p>Text has been added into the narratives accompanying individual policies highlighting the alignment of these policies to the GES Descriptors.</p>
<p>Sustainable Management of Natural Resources (SMNR)</p>	
<p>There should be clearer application of the principles of SMNR and support for the delivery of the UK Marine Strategy.</p> <p>The achievement of SMNR is referenced as a desired outcome rather than a fundamental requirement.</p>	<p>A narrative to sit alongside the WNMP on the relationship between the Environment Act (Wales) 2016 and marine planning has been developed and published in collaboration with Natural Resources Wales (NRW) and Welsh Government Natural Resources policy officials. This reflects that the focus of the objectives and principles of SMNR apply to NRW in the exercise of their functions. The narrative sets out the role of the WNMP as a planning tool supporting natural resource management as set out in the Natural Resources Policy (NRP). The WNMP sits alongside other strategic and local plans and policies, supporting the delivery of NRP priorities. References to SMNR in the WNMP have been streamlined accordingly and clear and expanded narrative has been included in Annex 1 to the WNMP, setting out how the principles of SMNR are applied in the WNMP.</p>

Stakeholder comment summary	Resulting change made
	<p>The WNMP now makes clear reference to the intrinsic value of the marine environment and marine ecosystems. Sector growth targets have been removed, additional clarity has been provided on the alignment of plan policies to the UK Marine Strategy and GES Descriptors and the link between SRAs and Sector Supporting Policy has been removed.</p>
<p>Cross-Border Management</p>	
<p>Further information should be provided on how cross border coherence (both land/sea borders and marine planning/national boundaries) will be achieved and how cross-boundary issues should be considered.</p>	<p>Annex 1 to the WNMP has been expanded to address this issue and to provide greater information on integration with other planning processes, while Policy GOV_02 has been re-focused specifically on cross-border and plan compatibility.</p> <p>More reference to cross-border considerations will be included in the Implementation Guidance accompanying the WNMP.</p>
<p>Proportionality and precaution</p>	
<p>The draft WNMP's focus on proportionality and the inclusion of policies GEN_02 and SCI_01 was welcomed. Respondents noted the importance of clear policy direction to enable proportionate decision-making while ensuring the precautionary principle is not lost.</p>	<p>Further language on the precautionary principle has been added to the WNMP, while the Implementation Guidance accompanying the WNMP will include guidance on proportionate decision making while also applying the precautionary principle where appropriate (for example, where a lack of evidence is a factor).</p>

Modifications made to the WNMP by section

16. This section summaries key comments made in relation to specific aspects of WNMP policy, together with resulting modifications to the WNMP.

Table 2: WNMP Vision and Objectives

Section	Stakeholder comment summary	Resulting change made
Introduction and WNMP Vision	When referring to the aim for the WNMP to shape our seas to support economic, social and environmental objectives, reference should also be made to cultural objectives.	Reference to cultural objectives has been added to the Introduction and the WNMP Vision has been expanded to cover maritime cultural heritage.
WNMP Vision	The WNMP Vision should reference the importance of managing marine and coastal resources in a sustainable way.	Reference to managing natural resources sustainably has been added.
WNMP Vision	The WNMP Vision should only include the vision itself and not a narrative on how the vision will be achieved.	The text on how the vision will be achieved has been transferred to the narrative accompanying the WNMP Vision.
WNMP Vision	The WNMP Vision should encourage public understanding.	The WNMP Vision now includes reference to improving health and well-being through understanding of, and access to, the marine environment.
WNMP Objectives	There is no recognition of the importance of tourism and recreation within the WNMP Objectives.	An objective (now Objective 5 in the WNMP) recognising the significance of coastal tourism and recreation has been added.
WNMP Objective 3	It would be beneficial to specify that the development of renewable energy resources should be in appropriate places.	Reference to “the right development in the right place” has been added.
WNMP Objective 5	It isn’t possible to say that the WNMP, in itself, can reduce poverty.	Objective 5 (now Objective 6 in the WNMP) has been re-phrased to remove the reference to reducing poverty and to focus on supporting the development of coastal communities.
WNMP Objective 8	This objective should support of the achievement of Good Ecological Status (GeS), in addition to GES.	Reference to GeS has been added to Objective 8 (now Objective 9 in the WNMP).
WNMP Objective 9	Supporting a well-managed MPA network and viable populations of rare and vulnerable species should be added to the WNMP Objectives.	Objective 9 (now Objective 10 in the WNMP) has been expanded to incorporate these aims.

Section	Stakeholder comment summary	Resulting change made
WNMP Objective 12	This objective may no longer be necessary as it repeats the principles covered by Objective 1.	This objective has been removed.
WNMP Objectives	A clearer explanation in the accompanying text of the process by which the UK High Level Marine Objectives were set in the MPS would provide context to the WNMP and WNMP Objectives.	Annex 1 to the WNMP has been revised and expanded to provide this context.

Table 3: WNMP General Policies

Section	Stakeholder comment summary	Resulting change made
GEN General Policy – Planning Policy		
GEN_01 and GEN_02	Describing these policies as overarching policies gives them undue prominence and risks creating a hierarchy of policies. Sustainable development is not defined in the policy narrative and there is no reference to the principle of supporting all well-being goals equally.	These policies are no longer described as overarching. The policy narrative has been expanded to provide further commentary on sustainable development and the application of the well-being goals within the WNMP policy framework.
GEN_02	The statement that GEN_02 is particularly relevant to sectors contributing to economic growth risks undermining the WNMP’s alignment with the Environment Act (Wales) 2016.	This statement has been removed.
ECON General Policy – Achieving a Sustainable Marine Economy		
Blue Growth	A definition of Blue Growth should be provided.	A definition for Blue Growth, based upon the Welsh Government’s definition of Green Growth, has been agreed with the MPSRG and incorporated within the ECON – Achieving a Sustainable Marine Economy section of the WNMP.
Introduction to ECON – Achieving a Sustainable Marine Economy	Sectors identified as having significant potential for sustainable growth should include science and innovation.	The science and innovation sector has been added to the list of sectors with significant potential for sustainable growth.
Introduction to ECON – Achieving a Sustainable Marine Economy	Reference should be added to developing understanding of the potential economic benefits of historical assets.	The text has been expanded to add this reference.
ECON_01	Reference to Blue Growth should be amended to a Sustainable Blue Economy. The policy is focused on development at the expense of wider aspects of well-being. Reference to SMNR should be more prominent in the policy wording. It is unclear how an appraisal could consider whether an activity allows people to take advantage of wealth; this is outside of the scope of the WNMP.	The policy title has been amended to “Sustainable Economic Growth”. Contributing to SMNR now features more prominently in the policy wording and reference to generating wealth and allowing people to take advantage of wealth have been removed.
ECON_02	Reference in the supporting narrative to MPA management measures balancing ecosystem goods and services and economic growth should be removed.	These references have been removed.

Section	Stakeholder comment summary	Resulting change made
ECON_02	ECON_02 could also require applicants to demonstrate what options they have considered and what actions they intend to take to promote coexistence with existing activities.	ECON_02 policy wording has been amended to state that proposals should demonstrate how they have considered opportunities for coexistence.
SOC General Policy – Ensuring a Strong, Healthy and Just Society		
SOC_01	The policy should recognise that there may be circumstances in which access to the marine environment needs to be restricted on health and safety grounds.	The policy has been re-worded to encourage, instead of require, access to the marine environment. The policy narrative states that, where possible and appropriate, access should be supported.
SOC_03	The policy wording should be amended to set out that proposals should demonstrate how they have minimised their risk of causing or contributing to pollution incidents.	The policy wording has been amended accordingly.
Introduction to SOC_08 and SOC_09	The WNMP refers to coastal change as a natural process, and not a process that may also result from human intervention. This definition should be clarified accordingly.	The definition of coastal change has been clarified to state that it can result from both natural and man-made physical changes.
SOC_09	This policy should be split into two separate policies to distinguish between the compulsory considerations related to coastal processes and flooding and the policy encouragement to align with relevant Shoreline Management Plans (SMPs).	This policy has been retained as a single policy but split into two parts, reflecting the different policy weightings and direction applied to compulsory considerations and policy encouragement to align with SMPs.
SOC_11 and SOC_12	As both these policies relate to resilience to climate change, they could be combined into a single policy. The requirement under SOC_12 for public authorities to support opportunities for increasing resilience towards climate change may not always be appropriate.	These policies have been combined into a single expanded SOC_11 policy. The wording of the clause originating from the draft WNMP SOC_12 policy has been re-focused on encouraging proposals that contribute towards climate change resilience.
ENV General Policy – Living within Environmental Limits		
Introduction to ENV – Living within Environmental Limits	This narrative should include reference to the intrinsic value of the marine environment.	Reference to the intrinsic value of the marine environment has been added.
Introduction to ENV_01	Reference to OSPAR, in terms of its role as a platform for post-EU cooperation, should be added into the text.	Reference to OSPAR has been added.

Section	Stakeholder comment summary	Resulting change made
ENV_01	<p>This policy is welcomed but the wording should be strengthened.</p> <p>It should be recognised that some proposals may not, by their nature, contribute to ecosystem protection, restoration or enhancement.</p> <p>It is suggested that the policy incorporates requirements to consider adverse impacts and how these will be addressed.</p>	<p>The policy has been revised to introduce measures requiring adverse impacts to be considered and addressed, with a requirement to present a clear and convincing case to proceed where this cannot be done. The policy also encourages proposals that contribute to marine ecosystem protection, restoration or enhancement.</p>
ENV_02	<p>The supporting narrative should make reference to the potential for further MPA designations.</p>	<p>Reference to the Welsh Government's commitment to designating further MPAs, as appropriate, is now included in the policy narrative.</p>
ENV_02	<p>Guidance should be provided on future designation of Marine Conservation Zones (MCZs) in SRAs.</p>	<p>Clarification that SRAs will not unduly hinder the designation of MPAs to ensure an appropriate contribution to a coherent MPA network has been added to the policy narrative.</p>
ENV_02	<p>Reference should be made within the policy to provisions for proposals to proceed if there are imperative reasons of overriding public interest (IROPI) or under the provisions of Section 126(7) of the MCAA.</p>	<p>Reference to IROPI is already included in the policy narrative, reference to the provisions of Section 126(7) of the MCAA has been added.</p>
ENV_03	<p>The wording should be revised to require proposals to minimise the risk of introducing invasive non-native species and to recognise that some proposals may not pose biosecurity risks.</p>	<p>The policy wording has been revised to address these points and to recognise that biosecurity measures should be included where this is appropriate.</p>
ENV_04	<p>As the deliberate introduction of litter is prohibited by law, the policy wording should be amended to state that proposals should demonstrate how they will avoid/minimise the introduction of litter.</p>	<p>The policy wording has been revised to require proposals to demonstrate how they will avoid/minimise the introduction of litter.</p>

Section	Stakeholder comment summary	Resulting change made
GOV General Policy – Promoting Good Governance		
GOV_02	<p>There is no policy on cross-border collaboration. This is particularly important given the Severn and Dee Estuaries, which fall within both Welsh and English marine plan areas.</p> <p>There is a need for better policy direction on cross-border coherence with other plans and planning processes (including land/sea borders).</p> <p>GOV_02's focus on well-being goals represents unnecessary duplication of legislative requirements.</p>	GOV_02 has been re-focused specifically on cross-border and plan compatibility, removing the references to well-being goals.
SCI General Policy – Using Sound Science Responsibly		
SCI_01	The term 'proportionate decision-making' should be included within SCI_01 to align with GEN_02.	The policy wording has been expanded to also cover a proportionate approach to decision-making.

Table 4: Strategic Resource Areas

Section	Stakeholder comment summary	Resulting change made
The purpose and role of SRAs in decision making	There is some ambiguity on the definition and application of SRAs in decision making.	SRAs are not included within the WNMP. The WNMP makes provision for the potential future introduction of SRAs through Marine Planning Notices (MPNs). The WNMP specifies the status of MPNs in decision making.
SRAs, sustainability and development	<p>Although the principle of ensuring marine plans have a strong spatial context is supported, SRAs appear to prioritise economic growth over biodiversity conservation.</p> <p>Further clarity should be provided on the interaction between MPAs and SRAs, and the future designation of MPAs within SRAs.</p> <p>Identification of SRAs should incorporate consideration of environmental opportunities, sensitivities and constraints.</p>	<p>The link between SRAs and Sector Supporting Policy has been removed. The concept of SRAs has been refined to focus on identifying and recognising natural resources of importance to certain sectors, with SRAs becoming tools to support management of sector-sector interaction and guide Sector Safeguarding Policy.</p> <p>Text has been added to clarify the relationship between SRAs and MPAs and confirming that with regard to MPAs, certain human activity may not be appropriate. Clarification that SRAs will not unduly hinder the designation of MPAs to ensure an appropriate contribution to a coherent MPA network has been added to the policy narrative.</p> <p>The WNMP sets out that environmental constraints and opportunities will form part of the criteria to be considered in the development of SRAs.</p>
SRAs – establishing the need to proceed	The WNMP should be more explicit on the need to develop SRAs.	The WNMP has been expanded to set out criteria to be considered when developing SRAs. These include considerations around sector need and benefit as well as technical opportunity.
SRA definition and underpinning evidence	There appear to be inconsistencies in how SRAs have been defined, with insufficient rationale and underpinning evidence to support boundary definition.	SRAs are not included within the WNMP. The WNMP makes provision for the potential future introduction of SRAs through MPNs and sets out clear criteria on the underpinning evidence required to define SRAs.

Section	Stakeholder comment summary	Resulting change made
SRAs – overlaps and conflicts with other activity	There should be greater consideration of the overlap between proposed SRAs and conflicts with other uses of marine space. There is potential for SRAs to act as barriers to activity in other sectors.	The concept of SRAs has been refined to focus on identifying and recognising natural resources of importance to certain sectors, with SRAs becoming tools to support management of sector-sector interaction and guide Sector Safeguarding Policy. The WNMP sets out the need to consider the needs of and potential impacts upon other sectors when developing SRAs.
Stakeholder engagement in developing SRAs	It is important to ensure that stakeholders have the opportunity to input into the development of proposed SRAs.	SRAs are not included within the WNMP. The WNMP makes provision for the potential future introduction of SRAs through MPNs and specifies that proposals for SRAs will be subject to consultation.
Reviewing SRAs	Consideration should be given to methods by which SRAs can be reviewed and refined.	The WNMP makes provision for amending SRAs.
Sector SRAs	Consideration could be given to potential SRAs for offshore wind and Tourism and Recreation. The absence of a Tourism and Recreation SRA could be perceived as a lack of recognition of the strategic importance of the sector.	The WNMP identifies offshore wind as one of the sectors where the potential to develop an SRA may be considered. While the WNMP does not specifically propose a potential Tourism and Recreation SRA, it explicitly identifies Tourism and Recreation as a priority for marine planning and a Plan Objective recognising the significance of coastal tourism and recreation to the economy and to well-being has been added.

Table 5: WNMP Sector Policies – Sector Objectives

Section	Stakeholder comment summary	Resulting change made
All sectors	The ambition to maximise growth or achieve sustainable sector growth is inconsistent with the aim of achieving sustainable development.	Sector Policies and accompanying policy narratives have been refocused on supporting sustainable development in place of maximising sector growth or seeking to achieve sustainable growth.
All sectors	The value of including sections on the economic contribution of individual sectors is unclear. Much of the evidence and statistics which are cited require updating. Inclusion of such figures will result in those sections of the WNMP becoming obsolete over time.	Date-specific evidence and statistics which may become obsolete over the lifetime of the WNMP (including data on the economic contribution of individual sectors) have been removed.
All sectors	The meaning of the symbols accompanying the Sector Objectives is unclear.	A key to the symbols has been provided.
Aquaculture and Tourism and Recreation	The inclusion of specific sector growth targets and the derivation of these growth targets were queried. It was felt that growth targets risk disproportionately prioritising sector growth over other considerations.	Specific growth targets have been removed and the Sector Objectives for Aquaculture and Tourism and Recreation have been refocused on sustainable development.
Aggregates	The definition of aggregates is unclear.	The definition has been revised and clarified.
Aquaculture	The target for increasing aquaculture production may lead to aquaculture coming into conflict with recreational boating.	Specific growth targets have been removed from the WNMP. The WNMP's Safeguarding Policies make provisions in relation to potential conflict between different uses.
Energy – Low Carbon	Reference could be included in the narrative to the target for Wales to generate 70% of its electricity consumption from renewable energy by 2030.	Explicit reference to this target has been incorporated into the narrative.
Oil and Gas	The Sector Objective should be re-worded to recognise that while gas is important in the low carbon transition, it is unlikely to be a long-term energy source without measures to mitigate the environmental effects.	The Sector Objective has been re-focused on maximising sustainable recovery of oil and gas, with the underpinning narrative setting out the continuing reliance on oil and gas in maintaining the UK's energy security while highlighting the importance of mitigating environmental effects. The underpinning narrative has also been expanded to set out the Welsh Government's policy aim to avoid continued extraction of fossil fuel in areas under Welsh Government jurisdiction.

Section	Stakeholder comment summary	Resulting change made
Fisheries	The wording of the Sector Objective and accompanying narrative should be amended to ensure that sustainability is at the heart of the text, with greater recognition of the importance of utilising natural resources in a way and at a rate that maintains marine ecosystem resilience.	Wording has been amended to reference a sustainable, diversified and profitable fishing sector, with greater emphasis on ecosystem resilience.
Ports and Shipping	The Sector Objective should be focused on sustainable development instead of advocating sustainable sector growth.	The Sector Objective now sets out the aim to support sustainable development in the sector.

Table 6: WNMP Sector Policies – Supporting Policy

Section	Stakeholder comment summary	Resulting change made
Sector Supporting Policies		
All sectors	<p>There is limited evidence of the principle of SMNR being applied within the Sector Supporting Policies.</p> <p>Economic development is privileged above the protection of marine ecosystems and SMNR.</p> <p>Sector Policies should be re-worded to provide policy support, subject to the caveat that proposals comply with the WNMP’s General Policies.</p>	<p>The wording of the Sector Supporting Policies has been amended to clearly state that proposals should comply with relevant General Policies, including ENV policies on Living within Environmental Limits.</p> <p>Policies and policy narratives have been refocused from supporting sector growth or maximising growth to supporting sustainable development, with specific sector growth targets removed.</p> <p>The link between Sector Supporting Policy and SRAs has been removed, with SRAs re-focused on safeguarding potential future resource use.</p>
Aggregates and Oil and Gas	Supporting Policies for Aggregates and Oil and Gas do not acknowledge that these are finite and non-renewable natural resources.	The policy narrative for Aggregates includes recognition that these are finite natural resources which should be sustainably managed. Oil and Gas Supporting Policy for the areas under Welsh Government jurisdiction has been revised to reflect Welsh Government policy to avoid continued extraction of fossil fuels.
Aggregates	The Supporting Policy is not necessarily consistent with the concept of sustainable development.	The WNMP recognises the essential role of marine aggregates to economic development, while recognising that extraction needs to be carefully managed, with provision for setting tonnage limits. Aggregates Supporting Policy has been revised to include the requirement for proposals to comply with WNMP General Policies, including ENV – Living within Environmental Limits policies. Wording of the policy narratives has been discussed with NRW to ensure an appropriate balance of economic and environmental factors.
Aggregates	Questioning the rationale for shorter term aggregate extraction licences in new or sensitive areas.	Shorter term licences has been retained as the standard policy approach but the wording has been amended to allow flexibility for longer term licenses if justified.

Section	Stakeholder comment summary	Resulting change made
Aggregates	It is difficult to understand why the Interim Marine Aggregates Dredging Policy (iMADP) is being withdrawn yet the draft WNMP identifies it as a consideration in decision making.	The wording has been amended to reflect that, while the iMADP is withdrawn at the time of the adoption of WNMP, the WNMP's policies are partially derived from the iMADP's evidence base and policy approaches, therefore its content will continue to act as a relevant point of reference.
Aquaculture	The importance of ensuring that proposals for future developments can be delivered sustainably should be recognised. This is particularly important given the specific growth target for aquaculture.	The specific growth target has been removed and the policy narrative re-focused on supporting sustainable sector development. The wording of the Supporting Policy has been amended to clearly state that proposals should comply with WNMP General Policies, including ENV – Living within Environmental Limits policies.
Aquaculture	In linking the Supporting Policy to SRAs, there is a lack of clarity on the policy approach to proposals outside these areas.	The link between Sector Supporting Policy and SRAs has been removed; Supporting Policy is now pan-Wales with no specific spatial focus.
Dredging and Disposal	The narrative on ensuring that sediment analysis frequency is compliant with OSPAR requirements should not be linked with licence conditions, as this would imply pre-supposition of longer term licences.	The link to licence conditions has been removed.
Energy – Oil and Gas	The Supporting Policy does not align with the WNMP's Objectives and General Policies or the goals of transitioning to a low carbon economy and reducing carbon emissions.	The Supporting Policy for areas under UK Government jurisdiction (which is retained policy) is now focused on maximising economic recovery and states that proposals should comply with relevant WNMP General Policies, including ENV policies on Living within Environmental Limits. Supporting Policy has now been incorporated for areas under Welsh Government jurisdiction, reflecting Welsh Government policy to avoid continued extraction of fossil fuels.

Section	Stakeholder comment summary	Resulting change made
Energy – Oil and Gas	It is unclear whether Oil and Gas policy also covers shale gas, coal bed methane or underground coal gasification.	The definition of Oil and Gas has been amended to state that it covers oil and gas resources including shale gas, coal bed methane and underground coal gasification. Specific policy direction has been added in relation to coalbed methane, shale gas and underground coal gasification in areas under Welsh Government jurisdiction.
Energy – Oil and Gas	The exploration and extraction of oil and gas has significant potential underwater noise impacts, which should be referenced.	The wording of the Supporting Policy has been amended to state that proposals should comply with relevant WNMP General Policies, including ENV policies on Living within Environmental Limits (Policy ENV_05 relates to underwater noise).
Energy – Low Carbon	It is of significant concern that tidal lagoon policy is being brought forward via an IROPI case and expresses support for large-scale development likely to result in adverse effects on the integrity of European Site(s) for which successful compensation may be challenging. Consideration of such impacts should not be delegated to project level appraisals. An evidence-based approach to planning and assessment would be a more appropriate way forward.	Tidal lagoon policy has been reviewed in conjunction with key stakeholders and NRW and has been refined to focus on a stepwise approach to supporting the sector, including a strategic, evidence-based approach to allow for greater understanding of future opportunities. The revised policy is no longer being brought forward under IROPI.
Energy – Low Carbon	The WNMP should give greater consideration to the likely cross-border and cumulative impacts of large scale lagoon infrastructure. It should also acknowledge the importance of appropriate strategic planning and governance approaches to address such cross-border issues.	<p>The revised tidal lagoon policy focuses on a strategic, evidence-based approach, with recognition in the policy narrative that impacts in neighbouring marine plan areas cannot be ruled out at a plan level and without further research. The policy narrative also recognises the need for strategic planning involving cross-border considerations.</p> <p>The policy narrative recognises that any large scale lagoon project would be determined as a Nationally Significant Infrastructure Project and may therefore benefit from a UK National Policy Statement being in place.</p>

Section	Stakeholder comment summary	Resulting change made
Energy – Low Carbon	There is an apparent lack of ambition for the policy for offshore wind; no mention is made of the potential of floating wind technology.	Supporting Policy for offshore wind identifies good opportunity for further offshore developments and includes support to understand opportunities for sector development, including floating wind technology.
Energy – Low Carbon	Policy ELC_01 appears to comprise several different and distinct policies, making it unclear how applicants can demonstrate compliance. There is also some duplication between the different clauses of the policy.	Policy ELC_01 has been restructured into four distinct policies, one for each marine renewable energy sub-sector (offshore wind, wave, tidal stream, tidal lagoon).
Energy – Low Carbon	The policy does not reference local ownership targets relating to energy generation.	Reference to the local ownership target for renewable energy projects has been added to the policy narrative.
Energy – Low Carbon	<p>Clarification is required on the rationale for not developing an SRA for offshore wind. Policy encouragement for developments in wave and tidal energy SRAs (and, in particular, SRAs for tidal range) are of concern as the policy does not appear to address potential impacts on protected sites and species and lacks underpinning evidence on environmental constraints and opportunities. The SRA for tidal range may conflict with recreational boating.</p> <p>It is unclear why ELC_01 encourages the development of further evidence on and strategic support for the established technology of offshore wind (for which no SRA is proposed) when there is no equivalent policy support to develop further evidence in relation to wave and tidal lagoon energy.</p>	<p>SRAs are not included within the WNMP. The WNMP makes provision for the potential future introduction of SRAs through MPNs, where justified and where the evidence base is sufficient. The WNMP notes that consideration may be given to developing SRAs for all sub-sectors of ELC, including offshore wind.</p> <p>The link between SRAs and Sector Supporting Policy has been removed and SRAs have been refined to focus on identifying resources of importance to certain sectors, with SRAs becoming tools to support Sector Safeguarding Policy.</p>
Energy – Low Carbon	The requirement for public authorities to make relevant evidence widely available should be removed from the ELC_01 policy wording due to potential issues relating to data confidentiality and technological capacity.	The policy encouragement to collaborate to develop the evidence base is retained in the policy wording, however the clause on evidence availability has been caveated with the term 'where it is appropriate to do so', in recognition of these concerns.
Fisheries	The policy narrative promoting exploitation of under-utilised species should be caveated with the need to assess the sustainability of such proposals.	A caveat has been added that opportunities to exploit under-utilised species would apply where populations are sufficiently resilient to sustain increased exploitation.

Section	Stakeholder comment summary	Resulting change made
Fisheries	There should be recognition of the importance of reducing impacts on non-target species and consideration should be given to the absence of proposals to reduce bycatch, with support for achieving Maximum Sustainable Yield (MSY) for all species.	Support for proposals which respect the principles of MSY and minimise by-catch and adverse impacts on non-target species has been incorporated within the policy narrative.
Ports and Shipping	There is a need to show greater consideration of relevant WNMP General Policies, including the ENV policies on Living within Environmental Limits.	The wording of the Supporting Policy has been amended to clearly state that proposals should comply with WNMP General Policies, including the ENV policies on Living within Environmental Limits.
Ports and Shipping	In linking the Supporting Policy to SRAs, there is a lack of clarity on the policy approach to proposals outside these areas, and on how these areas interact with other designations. It is unclear why all statutory harbour areas have not been included within the proposed SRAs.	SRAs are not included within the WNMP. The WNMP makes provision for the potential future introduction of SRAs through MPNs. The link between Sector Supporting Policy and SRAs has been removed; Supporting Policy is now pan-Wales with no specific spatial focus and SRAs have been refined to become tools to support Sector Safeguarding Policy.
Ports and Shipping	Due to the risk that port diversification could result in displacement of existing activity, policy on diversification could be removed from P&S_O2 and covered in a separate policy.	The re-drafted Supporting Policy includes a requirement to comply with the Common Safeguarding Policy, which safeguards against unacceptable displacement of existing activity.
Subsea cabling	In relation to the burial of cables, a note should be added that the nature of activity over buried cabled needs to be considered in light of prudent maritime practice and national and international law.	Wording has been added into the policy narrative to reflect this.
Tourism and Recreation	The WNMP should encourage coastal defence measures promoting tourism and recreation improvements.	The policy principle of encouraging co-existence and sharing of facilities and infrastructure has been added into the policy narrative.
Tourism and Recreation	The Tourism and Recreation Supporting Policy appears relatively weak, with a lack of clarity on the nature of Government policy objectives. The policy should be revised to be consistent with the wording of Supporting Policy for other sectors.	The Supporting Policy has been re-worded to be consistent with the Sector Supporting Policies for other sectors, with a clear policy narrative highlighting policy priorities. Wording has been added signposting the policy focus for developing the sector, as set out by the Sector Objective.

Table 7: WNMP Sector Policies – Safeguarding Policy

Section	Stakeholder comment summary	Resulting change made
Safeguarding Policy	For clarity, the requirement to provide a clear and convincing case should also apply to the exceptional circumstances test, and not simply to making a case to proceed.	The requirement to present a clear and convincing case has been added to the exceptional circumstances justification.
All, except Defence	The draft WNMP is extremely long and would benefit from streamlining to aid usability. Policy narratives accompanying Sector Policies are considerably longer than those for General Policies. There are some inconsistencies in wording between different Sector Safeguarding Policies.	Individual Sector Safeguarding Policies (for sectors other than Defence) have been replaced by Common Safeguarding Policy, streamlining policy and addressing any inconsistencies in wording.
Aggregates	There is inconsistency in the levels of safeguarding applied to different areas (e.g. licensed or exploration areas) and insufficient nuancing within the policy wording to reflect the levels of commitment/risk for the industry.	The Common Safeguarding Policy establishes common and consistent cross-sector safeguarding policies, differentiating between existing use and future potential use and applying appropriate levels of safeguarding in both instances, reflecting the levels of risk and investment committed.
Fisheries	It's not clear whether FIS_03 is focused on fishing activity or species/habitats.	To clarify the policy focus on safeguarding key fish habitats and species, this policy has been transferred to the ENV – Living within Environmental Limits section as policy ENV_07.
Ports and Shipping	P&S_03 should cover ship repair, inspection and recycling facilities.	P&S_03 has been replaced by the Common Safeguarding Policy. The policy narrative no longer references SRAs but references the application of this policy to existing ports, harbours and marinas.
Subsea cabling	Clarification should be added to CAB_02 regarding cables passing through Welsh waters connecting to English landfall.	Additional wording has been added to the policy narrative to clarify its application to cables passing through Welsh waters and connecting with English landfall.
Tourism and Recreation	T&R_02 should also explicitly guard against significant adverse effects on the UK Government's tourism and recreation objectives for English marine areas.	T&R_02 has been superseded by the Common Safeguarding Policy. The policy narrative for the Tourism and Recreation Supporting Policy has been amended to highlight issues of cross-border coordination and the provisions of GOV_02 on cross-border coherence.

No changes by section

17. This section summarises instances where, following careful consideration of consultation comments, no changes were made. In each instance, the rationale for this decision is set out.

Table 8: Overarching Issues

Issue	Stakeholder comment summary	Reason for no change
Net Gain and Natural Capital	It would be beneficial for the WNMP to refer to the principles of Net Gain and Natural Capital.	This is an early and evolving policy area with currently limited practical application to inform practice. Monitoring and reporting against such policy at this stage would therefore be challenging. For these reasons, it does not seem appropriate to include such policy at this stage.
Growth limits	The WNMP should integrate limits to growth to prevent over-exploitation of natural resources.	Understanding and setting environmental limits for sustainable use can be challenging and may not be an appropriate policy measure in all cases. A wide range of regulatory and policy measures are in place to manage environmental impacts within acceptable limits, helping to guide sustainable development. In some case, where good evidence is available and there is value in setting strategic limits through marine planning, it may be appropriate to do so, for example, for marine aggregate extraction off south Wales.
Marine evidence collection	The Welsh Government should develop and commit to a research and marine evidence collection work programme, including looking at how SMNR principles and an ecosystem approach will be applied in future iterations of the WNMP and developing understanding of the location, health and value of marine ecosystem goods and services.	Research and a marine evidence collection work programme are outside the direct scope of WNMP policy however an update to the Wales Marine Evidence Report is published alongside the WNMP. Welsh Government recognises the importance of evidence to underpin decision making and is currently developing a Marine and Fisheries Evidence Strategy. Specific work is also being progressed in relation to understanding, at a strategic level, opportunities and constraints.

Issue	Stakeholder comment summary	Reason for no change
SRAs	Queried the reason for not proposing SRAs for ecosystem resilience/natural capital, or for social wellbeing.	SRAs will, where appropriate, identify and recognise natural resources of importance to certain marine sectors. SRAs are a tool to improve the management of marine activities, supporting management of sector-sector interaction and guiding Sector Safeguarding Policy.
Policy coherence	The WNMP does not provide policies or guidance to assist decision making when there are conflicts between different users or interests.	The WNMP sets out the framework of policy principles to be applied to decision making. As in land planning practice, decisions on potential conflicts between different users or interests will be taken on a case-by-case basis, at the decision makers' discretion.
Proportionality and banding levels	The banding of proposals to guide the levels of evidence required for decision making is not helpful. Examples of the types of development falling within each band should be provided.	This approach is widely considered to be useful, in particular in terms of a de minimis approach for smaller applications (and is already used for NRW marine licensing decisions). It is not practical to define within the WNMP all banding options for all relevant Public Authorities.
GES	The WNMP needs to reflect the current status of unfavourable conservation status and GES targets for 2020, which are unlikely to be met.	The WNMP incorporates and supports GES targets. Including specific detail, for example conservation status, would unnecessarily date the plan and would be inappropriate for a strategic plan with a 20 year perspective.

Table 9: WMMP Vision and Objectives

Section	Stakeholder comment summary	Reason for no change
WNMP Vision	<p>The term ‘Sustainable Development’ should be used instead of ‘Blue Growth’.</p> <p>The WNMP Vision should clearly define the term Blue Growth.</p>	<p>The term Sustainable Development has been used consistently throughout the WNMP. A definition of Blue Growth, based upon the Welsh Government’s definition of Green Growth and clearly referencing social equity and environmental benefits, has been agreed with the MPSRG and is included within the ECON – Achieving a Sustainable Marine Economy section.</p>
WNMP Vision	<p>The WNMP Vision should reference the current state of Welsh seas and the target to achieve GES and to protect and restore biodiversity.</p>	<p>The WNMP incorporates and supports GES targets. Including specific detail, for example conservation status, would unnecessarily date the plan and would be inappropriate for a strategic plan with a 20 year perspective.</p>
WNMP Vision	<p>The WNMP Vision should include reference to respecting environmental limits.</p>	<p>The WNMP Vision provides a high-level statement and includes reference to the sustainable management of natural resources through an ecosystem approach. Further specificity on specific measures underpinning this approach would not be appropriate in the high-level vision of a strategic plan with a 20 year perspective.</p>
WNMP Vision	<p>The WNMP Vision should encourage local leadership.</p>	<p>The WNMP Vision provides a high-level statement that relates to all levels of marine management. It includes reference to the ecosystem approach which includes the need to operate at the appropriate scale and also that management should involve all stakeholders and local interests.</p>
WNMP Objectives	<p>Greater clarity should be provided on the desired outcomes of the WNMP Objectives and how these will be achieved and monitored.</p>	<p>These issues are covered by a separate Monitoring and Reporting Framework, published alongside the WNMP.</p>
WNMP Objectives	<p>Objectives (from earlier drafts of the WNMP) to support integrated decision making across the land-sea interface and to recognise the need for meaningful engagement have not been included.</p>	<p>Many stakeholders wanted to see a shorter plan with a clear focus. Considerations relating to integration across the land-sea interface are integrated throughout the WNMP. The ecosystem approach and SMNR require a more holistic and systems approach to deliver and these are embedded throughout the WNMP.</p>

Section	Stakeholder comment summary	Reason for no change
WNMP Objective 1	The objective only refers to the sustainable management of natural resources. It would be desirable for it to also reference ensuring the sustainable management of heritage assets.	WNMP Objective 6 (now Objective 7 in the WNMP) covers the protection and promotion of heritage and historic assets.
WNMP Objective 1	The wording should be revised from 'take account of' to 'take action to reduce' cumulative effects.	This would fail to recognise the potential for positive cumulative effects.
WNMP Objective 1	The wording should be revised to focus solely on SMNR and the ecosystem approach.	This approach would lose the focus on the well-being goals, which is integral to Objective 1.
WNMP Objective 3	Queried the rationale for having a specific objective for offshore wind and whether this objective relates to renewable energy or also to other marine resources such as aggregates.	The wording of the objective is 'marine renewable energy resources', which clearly conveys that this objective relates to marine renewable energy (not simply offshore wind and not to other marine resources such as aggregates).
WNMP Objective 3	The wording of the objective should explicitly reflect other interests and natural resources.	The reference to the right development in the right place, which has been added to the objective, covers this issue.
WNMP Objective 3	The objective should be specific to achieving Welsh, not UK, energy security.	Energy supply infrastructure is UK-wide. Consenting for major energy generation projects critical to energy security (which will be Nationally Significant Infrastructure Projects) is retained at UK Government level.
WNMP Objective 6	Objective 6 should be enhanced to embrace the concept of designated national seascapes.	This is an isolated comment, not reflective of wider consultation responses.
WNMP Objective 8	The wording should be strengthened to ensure the achievement and maintenance of GES, instead of to support.	The WNMP incorporates and supports GES targets. However, the achievement of GES is dependent upon numerous factors and cannot be directly delivered solely via the WNMP.

Table 10: WNMP General Policies

Section	Stakeholder comment summary	Reason for no change
General Policies		
Policy weighting	Where General Policies require proposals to present a clear and convincing case to proceed where adverse impacts cannot be addressed, this wording should be strengthened to require proposals to meet the exceptional circumstances test to justify proceeding.	The WNMP provides a positive policy framework to support sustainable development through proportionate and risk-based decision making. WNMP policies sit alongside regulatory and legislative provisions and policy weighting has been developed in conjunction with relevant statutory and regulatory bodies, such as NRW. However, in response to stakeholder feedback, in a number of instances, policy wording has been strengthened from “should” to “must present a clear and convincing case”.
GEN General Policy – Planning Policy		
GEN_01 and GEN_02	GEN_01 and GEN_02 are statements rather than policy, and re-iterate wider legislative requirements and principles on how to use the plan. There is potential duplication between GEN_02 and SCI_01.	These policies set the purpose of planning and the principle of a proportionate application of the WNMP by decision makers. Following discussion with the MPSRG, it was agreed to retain these policies but to no longer present them as overarching.
GEN_01	GEN_01 should place greater emphasis on conservation and enhancement of the marine environment, and on social benefits.	GEN_01 is framed by sustainable development and therefore incorporates all aspects of sustainable development.
GEN_02	GEN_02 should include reference to the use of precaution.	Further language on the precautionary principle has been added to the WNMP, while the Implementation Guidance accompanying the WNMP will include guidance on proportionate decision making while also applying the precautionary principle where appropriate (for example, where a lack of evidence is a factor).
GEN_02	It should be clear that GEN_02 applies to the WNMP only, and does not exempt developers from complying with regulatory requirements and wider policy. Further guidance should be provided.	The WNMP is clear that the plan will guide decision makers and that this will be through application of existing regulatory requirements and responsibilities.

Section	Stakeholder comment summary	Reason for no change
ECON General Policy – Achieving a Sustainable Marine Economy		
ECON_01	<p>The policy is focused on development at the expense of wider aspects of well-being. There should be clarification that whatever marine development is proposed, there should be economic, social and environmental and cultural benefit to the coastal communities.</p> <p>There is duplication between ECON_01 and SOC_02.</p>	<p>The WNMP's policies have been developed to work together, with the General cross cutting Policies and the Sector Policies coming together to collectively support sustainable development. It is not accepted that there is duplication between policies ECON_01 (with its focus on sustainable economic growth from which benefit can be accrued to coastal communities) and SOC_02 (which is focused on all aspects of well-being).</p>
SOC General Policy – Ensuring a Strong, Healthy and Just Society		
SOC_04	<p>Policy requirements should ensure that the extent and scope of evidence required from applicants is clearly expressed.</p>	<p>The WNMP sets policy principles, including the principle of project banding to support proportionate decision making. Decisions on evidencing requirements will be taken on a case-by-case basis, at the decision makers' discretion. Welsh Government may also, where appropriate, issue supplementary guidance.</p>
SOC_05 and SOC_06	<p>The introductory text to policies SOC_05 and SOC_06 should repeat the need for necessary approvals when dealing with heritage assets.</p>	<p>This text contextualises the policies by setting out the extent and nature of historic assets and designated landscapes. The WNMP sets key policy principles and does not supersede or negate the need for regulatory approvals; guidance on regulatory approvals may be provided separately, as required.</p>
SOC_05	<p>The policy should also cover non-designated assets and encompass both the historic assets and their settings.</p>	<p>The policy wording already covers both historic assets and their settings. The policy does not distinguish between designated and non-designated assets; the policy narrative states that the absence of designated assets does not imply that non-designated assets are of lesser significance.</p>

Section	Stakeholder comment summary	Reason for no change
SOC_06	This policy could also cover Historic Landscapes and Special Landscape Areas.	SOC_06 relates to landscapes subject to statutory designation and benefitting from the associated statutory protections, in recognition of the significance of the planning system in delivering the Welsh Government's objectives for these landscapes.
SOC_06 and SOC_07	An equal policy weighting should be applied to designated landscapes and seascapes.	Whilst a similar policy approach is taken to both policies (the wording of the policies has been revised to require adverse impacts to be considered and addressed and to encourage positive benefits), designated landscapes by their nature are afforded a higher level of consideration and protection.
SOC_07, SOC_08 and SOC_09	Queried whether proposals will be required to demonstrate how potential impacts on seascapes and coastal processes in English marine areas have been taken into consideration.	GOV_02 (cross border compatibility) has been strengthened to specifically focus on cross-border compatibility.
SOC_08	The definition of the term 'lifetime' is unclear.	It would not be appropriate to provide a fixed definition, as the duration of "lifetime" will vary between each project.
SOC_08 and SOC_09	These policies should link to Area Statements and coastal Local Development Plans and incorporate restrictions on certain developments in risk areas, as well as recognising the value of managed realignment.	The policy narrative already incorporates these principles and signposts to the relevant Technical Advice Note and to SMP policy. Policy GOV_02 requires consideration of relevant terrestrial development plans and relevant Area Statements.
SOC_10	This policy could be amalgamated with policy SOC_08.	Policies SOC_08 and SOC_10 cover distinct and different topics; SOC_08 relates to the resilience of a development to coastal change and flooding, SOC_10 focuses on avoiding or minimising/mitigating greenhouse gas emissions.

Section	Stakeholder comment summary	Reason for no change
ENV General Policy – Living within Environmental Limits		
ENV_02	ENV_02 could more proactively seek improvement to MPAs and the wider marine environment.	ENV_02 safeguards MPAs from adverse impacts; the policy wording has been retained following discussion with NRW and government policy officials leading on MPA designation and management. ENV_01 incorporates encouragement of proposals which contribute to the protection, restoration or enhancement of marine ecosystems.
ENV_02	The reference to IROPI in the policy narrative undermines the policy.	To remove provision for IROPI would run counter to the Conservation of Habitats and Species Regulations 2017.
ENV_04	The policy could cover the mitigation of marine litter events and encouragement to reduce the amount of litter.	The policy focuses on ensuring proposals are designed to avoid or minimise the introduction of litter, thereby indirectly reducing the amount of litter. Supplementary Implementation Guidance will cover wider complementary actions, including mitigation and actions to reduce the amount of litter.
GOV General Policy – Promoting Good Governance		
Introduction to GOV – Promoting Good Governance	Greater detail could be given on arrangements for the review and evaluation of the WNMP.	These issues are covered by a separate Monitoring and Reporting Framework, published alongside the WNMP.
GOV_02	It would be helpful to mention the need to take into account any impacts on adjoining authority areas and the potential for cumulative impacts.	Cumulative impacts are covered by GOV_01; the policy narrative to GOV_01 references consideration of any impacts on neighbouring marine plan areas. The supporting narrative to GOV_02 already makes reference to minimising adverse impacts in neighbouring jurisdictions.
SCI General Policy – Using Sound Science Responsibly		
SCI_01	This policy appears to refer to how other policies should be applied. It potentially duplicates GEN_02.	SCI_01 sets out the key principle of proportionate, evidence-based decision making. Its evidence-focus clearly distinguishes it from GEN_02, which relates to a proportionate and risk-based planning system.

Table 11: WNMP Sector Policies

Section	Stakeholder comment summary	Reason for no change
Sector Objectives		
Identification of sectors	Coastal defence work is not recognised as a sector.	Relevant considerations are covered by SOC_08 and SOC_09.
All	The Sector Objectives should be collated and presented earlier and more prominently within the WNMP, instead of being dispersed within the sector chapters.	Sector Objectives articulate the future desired state for a sector and provide context for Sector Policies. The re-focusing of the shortened WNMP on the core vision, objectives and policies increases the visibility of the Sector Objectives.
Aggregates	The Sector Objective is not necessarily consistent with the concept of sustainable development.	The WNMP recognises the essential role of marine aggregates to economic development while also recognising that extraction needs to be carefully managed, with provision for tonnage limits. Wording of the policy narratives in the Aggregates chapter have been discussed with NRW to ensure an appropriate balance of economic and environmental factors. The revised Supporting Policy for Aggregates includes the requirement for proposals to comply with WNMP General Policies, including ENV – Living within Environmental Limits policies.
Dredging and disposal	Reference to sustainability in the Sector Objective would be welcomed.	The Sector Objective focuses on maintenance of navigational access, not sector growth. The Supporting Policy and policy narrative clearly reference compliance with WNMP General Policies (including the ENV – Living within Environmental Limits policies) and to ensuring the deposition of material does not result in significant adverse effect upon ecosystem resilience.
Ports and Shipping	It is confusing to include marinas under Ports and Shipping.	The WNMP is prepared in accordance with and aligned to the MPS, which includes marinas under the Ports and Shipping sector.
Ports and Shipping	The WNMP should articulate the opportunities associated with marine renewables and the cruise sector.	The WNMP already clearly articulates these opportunities.

Section	Stakeholder comment summary	Reason for no change
Ports and Shipping	Welsh Government should fund infrastructure development and port staff to service the cruise market.	This is outside the scope of the WNMP.
Surface water and wastewater treatment and disposal	Surface water and wastewater should be addressed separately.	This chapter sets out the key strategic context and high level policy principles necessary to safeguard existing and planned infrastructure for the sector as a whole, regardless of the specific driver.
Tourism and Recreation	Tourism and Recreation are two separate sectors and could be split.	Tourism and Recreation is treated as a single sector in the MPS.
Tourism and Recreation	No reference is made to the value of recreation to wellbeing, health and community cohesion.	These references were already present in the draft WNMP policy narrative; they are now more visible in the condensed policy narrative in the WNMP.
Tourism and Recreation	Provision on standard branding, advertising, promotion and provision of site information should be included.	These issues are outside the scope of the WNMP.

Sector Supporting Policies

Aggregates	There may be a more appropriate way to control the level of extraction from a defined area rather than simply using a tonnage limit. Querying the 800,000 tonnage limit set for an area of the Severn Estuary.	This method has been as agreed with NRW. The tonnage capped area is based on current evidence reflecting the current extraction rate and environmental sensitivity.
Aggregates	The 800,000 tonnage limit set for an area of the Severn Estuary does not include the new Culver Sand Extension which overlaps with the Severn system.	The WNMP applies to all Welsh seas and requires justification to issue licenses (whereas iMADP, which was the derivation of the 800,000 tonnage limit, only applied to the Bristol Channel). It is not currently appropriate or practicable to determine an all-Wales tonnage limit.
Energy – Low Carbon	Further consideration could be given to community energy schemes.	The WNMP identifies the importance of exploring options for all forms of renewable energy, particularly those that contribute to the wellbeing of coastal communities. The Implementation Guidance will further highlight the importance of local ownership and targets relating to marine renewable energy.

Section	Stakeholder comment summary	Reason for no change
Energy – Oil and Gas	The Oil and Gas sector policy should be re-drafted to avoid authorising any new applications.	The Supporting Policy has been refined, reflecting the policy priorities in the areas under UK and Welsh Government jurisdiction respectively. The Supporting Policy for the area under Welsh Government jurisdiction reflects Welsh Government policy to avoid continued extraction of fossil fuels. However, the Supporting Policy policy direction remains in place for the UK Government jurisdiction, reflecting that this is a function retained by UK Government and UK Government policy recognises the continued significance of oil and gas to energy security as the UK moves towards a low carbon economy.
Fisheries	FIS_01 makes no reference to recreational sea angling.	Recreational sea angling is covered by the Tourism and Recreation sector.
Fisheries	The WNMP does not sufficiently recognise the paucity of stock data. There is a need for evidence on the distribution and importance of fisheries and to define important fisheries.	The policy narrative highlights the existence of evidence gaps and the importance of developing a fit-for-purpose evidence base to underpin decision making.
Fisheries	The WNMP does not address where and when fisheries activity should take place.	The WNMP provides a policy framework of principles to be applied in determining the appropriateness of activity. It is not prescriptive on the timing of an activity or the specific methodology to be used. The WNMP highlights evidence gaps as a limiting factor for further defining policy and highlights the importance of developing a fit-for-purpose evidence base to underpin decision making.
Ports and Shipping	With regards to P&S_02, clarity should be provided on the current licensing regime and which authority will take responsibility for functions devolved by the Wales Act 2017.	The comment relates to the Governance section of the draft WNMP, not P&S_02, and will be addressed in a supplementary guidance document on governance.
Ports and Shipping	It is not evident how flexibility for sector growth requiring specific port side infrastructure or warehousing is built into the policy.	P&S_02 covers the development of port and harbour facilities.

Section	Stakeholder comment summary	Reason for no change
Subsea Cabling	The WNMP should encourage proposals that minimise the extent of cabling required.	It is sector practice to diversify cable routes to reduce the risk of failure of critical infrastructure.
Surface water and wastewater treatment and disposal	Policy concerning the development of joined-up surface water and wastewater treatment and disposal infrastructure at cross border sites should be included.	The WNMP focuses on safeguarding existing infrastructure. GOV_02 covers cross border coordination.
Sector Safeguarding Policies		
Defence	DEF_01 should be re-worded to give significant weight to MOD comments instead of requiring MOD approval.	Defence and national security is a function retained by UK Government; the DEF_01 policy approach has been agreed with the MOD and is consistent with policy in English marine plans.
Energy – Oil and Gas	Safeguarding Policies for Oil and Gas should be removed to signal ambition to move away from reliance on fossil fuels.	While sector policy for the Welsh Government jurisdiction reflects Welsh Government policy to avoid continued extraction of fossil fuels, the policy direction for the UK Government jurisdiction reflects that this is a function retained by UK Government, and UK Government policy recognises the continued significance of oil and gas to the UK's energy security.
Energy – Low Carbon	ELC_03 may in some instances result in lengthy delays to decision making, potentially leading to areas where other development cannot happen until decisions are made.	Safeguarding policy will be applied in a proportionate manner and should not unduly extend timescales for decision making.
Fisheries	FIS_03 only covers fish species and habitats. There is scope for other species to receive associated protection.	ENV_01 covers marine ecosystems and encourages the improvement or restoration of marine habitats.

