



Llywodraeth Cymru
Welsh Government

Proposed approach to developing Strategic Resource Areas to support implementation of WNMP safeguarding policy

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Background

The WNMP includes sector **supporting** and **safeguarding** policies. Some of these sector-focussed planning policy tools are spatial in nature and, from a marine planning perspective, are being taken forward as part of a **spatial approach** to WNMP implementation.

Supporting policies include (where appropriate, depending upon the nature of a particular sector) policy encouraging the development of a better understanding of **future opportunities** for sustainable sector growth. In some cases, this is extended to also include opportunities to develop evidence which could support the process of defining a safeguarding **Strategic Resource Area (SRA)** for the sector.

Safeguarding policies in the plan (**DEF_01** and **SAF_01**) ensure that account is taken of current, **established activity** (e.g. fishing, shipping or tourism and recreation) or planned, **consented activity** (e.g. any development requiring a consent or authorisation). These policies apply whilst the plan is in effect. Alongside this, safeguarding policy **SAF_02** safeguards any **SRAs** (areas of resource with potential to support sustainable future use) which may be established for a sector under the WNMP.

Evidence to understand **future opportunities** may take many forms, including spatial mapping work. Evidence may be progressed by **various parties** (developers, advisory bodies, policy bodies, regulators, planning authorities) at a **range of levels** and is encouraged because it can effectively facilitate sector-specific planning, help avoid conflict and support coexistence and, can also, help further marine planning.

Welsh Government is producing **Sector Locational Guidance** providing enabling spatial evidence for some sectors as a contribution towards relevant sector supporting policies. The Welsh Ministers as the **marine planning authority** for the Welsh inshore and offshore plan regions are responsible for any mapping to identify any **SRAs**.

This document provides an overview of the approach proposed by the Welsh Government to identify sector SRA(s) for the implementation of WNMP policy SAF_02. This proposed approach is subject to change and, as such, the final process may vary from that described here. An intent to identify SRA(s) does not necessarily mean they will be introduced; a final decision will be taken by the Minister following consultation.

Sustainable Management of Natural Resources – Welsh Government’s spatial approach to WNMP implementation

The Welsh National Marine Plan (WNMP) sets out an integrated, evidenced and plan-led approach to sustainable development, respecting established uses and interests whilst looking to secure benefits from new opportunities; recognising the importance of our heritage, ecosystem resilience and the value of biodiversity and supporting the sustainable management of our natural resources (SMNR).

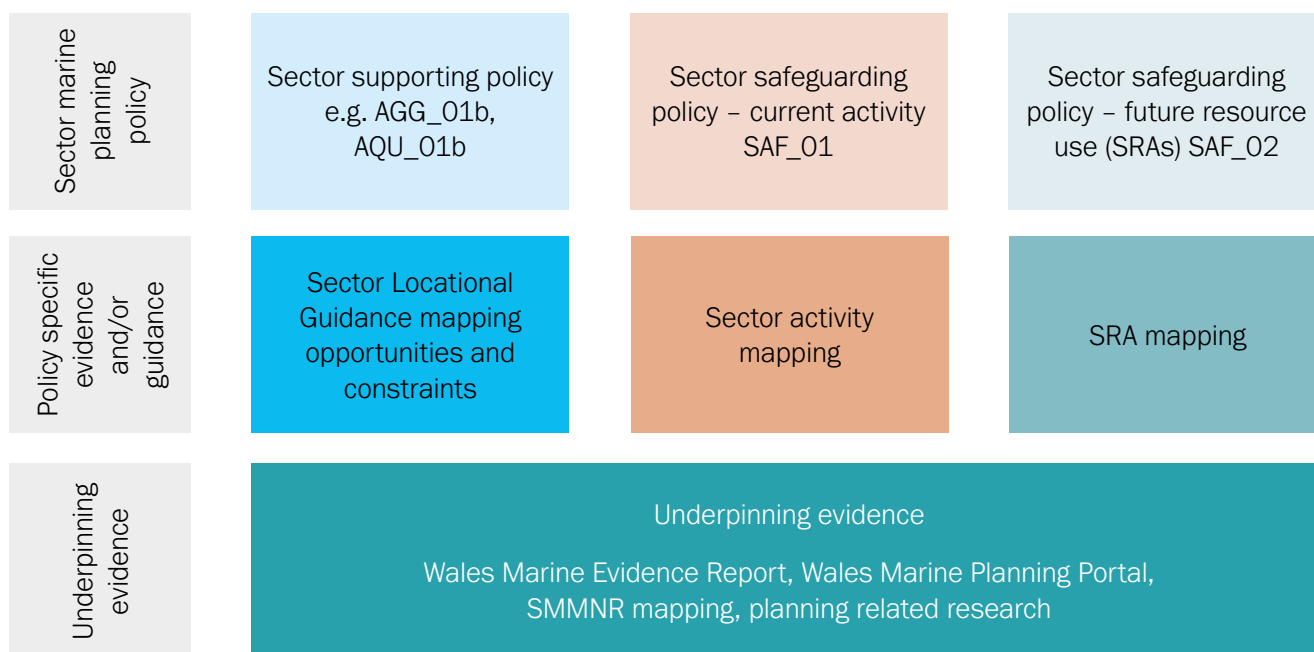
In support of WNMP implementation, and in line with the UK Marine Policy Statement’s direction to provide clear, spatial and locally-relevant expression of policy, implementation and delivery¹, the Welsh Government is taking a spatial approach to understanding opportunities and constraints related to sustainable resource use.

The approach includes:

- sharing spatial data through the Marine Planning Portal;
- production of Sector Locational Guidance;
- safeguarding of consented projects and established activities; and
- potential identification of Strategic Resource Areas (SRAs) to apply WNMP safeguarding policy to potential future resource use.

Figure 1 describes relationships between spatial evidence underpinning marine planning (e.g. the Marine Planning Portal), sector-specific evidence (e.g. Sector Locational Guidance related to sector supporting policies) and guidance for marine planning sector safeguarding policies.

Figure 1. WNMP sector planning policy and related evidence



¹ UK Marine Policy Statement, Chapter 2, Section 2.2.1

Marine Planning policy context for Strategic Resource Areas

WNMP sector safeguarding policies contribute to Wales' well-being goals by recognising and protecting natural resources and human uses in order to meet the needs of present generations (e.g. through SAF_01 safeguarding consented projects and established activities) without compromising the ability of future generations to meet their needs (e.g. through SAF_02 safeguarding potential future resource use).

The WNMP makes provision for introducing, through the publication of Marine Planning Notices (MPNs), SRAs which activate and focus WNMP safeguarding policy SAF_02 for potential future sustainable resource use, helping to meet societal need and deliver societal benefit.

Policy SAF_02 helps ensure the potential resource interests of sectors are taken into account at an early stage by others. SAF_02 operates alongside SAF_01, which already has effect and safeguards consented projects and established activities from inappropriate disturbance or interference from new proposals. For context, Annex 1 describes the policy approach to safeguarding existing activity through SAF_01.

SAF_02: Safeguarding strategic resources

Proposals which may have significant adverse impacts upon the prospects of any sector covered by this plan to engage in sustainable future strategic resource use (of resources identified by an SRA) must demonstrate how they will address compatibility issues with that potential resource use.

Proposals unable to demonstrate adequate compatibility must present a clear and convincing case for proceeding.

Compatibility should be demonstrated through, in order of preference:

- Avoiding significant adverse impacts on this potential strategic resource use, and/or
- Minimising significant adverse impacts where these cannot be avoided; and/or
- Mitigating significant adverse impacts where they cannot be minimised.

Strategic Resource Areas:

SRAs, if progressed, will describe and **safeguard discrete areas of natural resource** (not activity) and are intended to **facilitate proactive dialogue** between sectors to ensure any plans to expand resource use do not unnecessarily constrain either sector.

As such, SRAs do **not** confer any rights for use or development by any sector and all environmental regulation (and policies within the WNMP) will need to be applied in full for any development

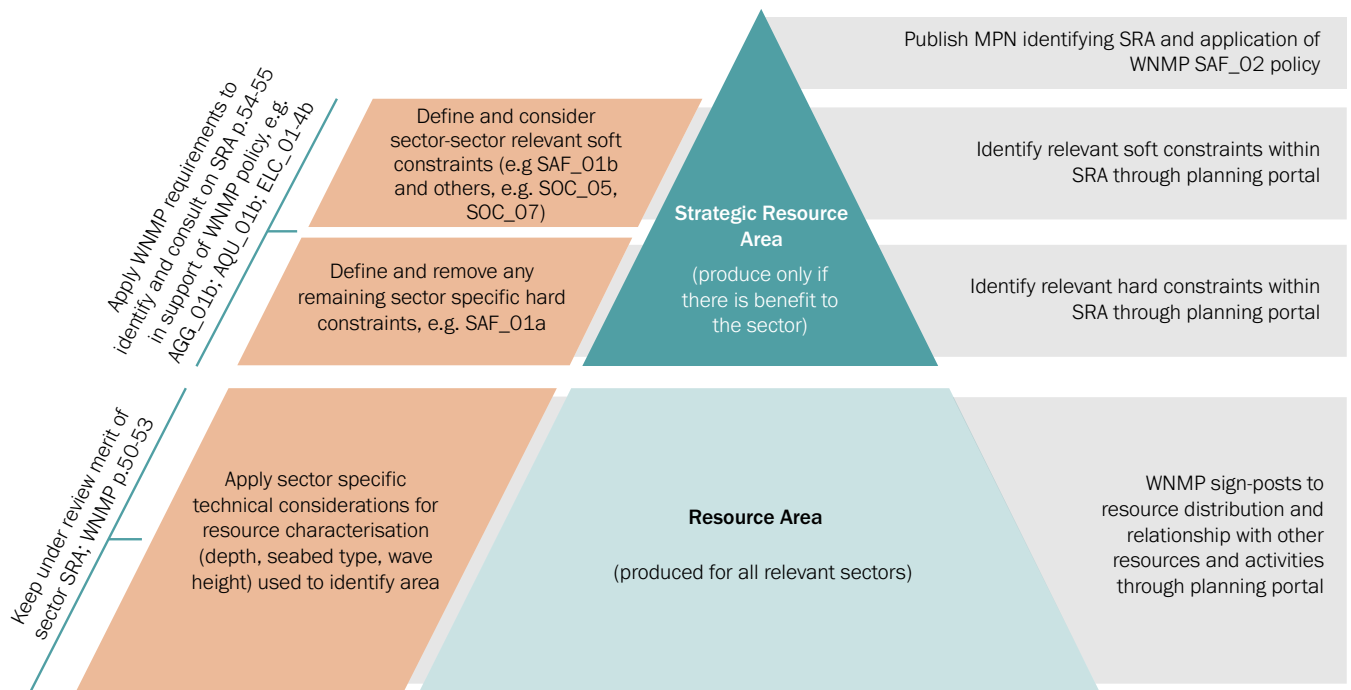
progressed within any SRA (as they are within all other locations). The identification of SRAs does not involve prescribing future development scenarios so does not directly inform meaningful environmental (cumulative) impacts assessment. However, whilst development scenarios are not prescribed within SRAs, the process of considering the future resource needs for any sector, including sector-sector interactions and environmental issues, is a step towards a more spatially focused and coherent marine planning system.

Strategic Resource Areas and Resource Areas:

SRA are a spatial refinement of broader Resource Areas (which describe the full spatial extent of natural resources of relevance to a sector).

Figure 2 describes the relationship between Resource Areas and Strategic Resource Areas.

Figure 2. Relationship between Resource Areas and Strategic Resource Areas



Our approach to SRA development

Welsh Government is intending to commence work, in partnership with stakeholders, to map potential SRAs. This decision is based on advice from sector Expert Panels and a consideration of both the need to and benefit of, as well as the practical opportunity to, identify SRAs. Work will be progressed in accordance with the WNMP (paragraphs 50-57), including **formal consultation** on any draft MPN(s) and proposed SRA(s). Welsh Government will also, at key points in the process, review whether to pursue or discontinue the development of any particular SRAs, including:

- when determining whether/which potential SRAs to progress to formal consultation;
- when considering responses to consultation and any amendments to the approach; and
- when, following consultation, determining whether/which SRAs to take forward to formal introduction.

Taking account of the inter-relationships between sectors (e.g. shared or competing interests, (in-combination) environmental effects, spatial overlap) requires an approach which brings together social, economic and environmental considerations. Whilst some of these considerations can be progressed at a sectoral level, some issues will require consideration at a multi-sectoral level (i.e. benefit from integrated multi-sector spatial planning).

To address this (and ensure parity and cohesion in SRA development whilst recognising it may only be appropriate to activate policy SAF_02 for certain sectors), we are taking an **integrated and co-ordinated** approach to SRA development, considering needs **holistically across a range of sectors** rather than progressing plans for an SRA on a standalone basis for an individual sector. As such, the MPN approach described in the WNMP could

potentially be applied at an all-Wales or regional scale, taking account of the sectors covered by the WNMP.

Stakeholder input will inform and underpin our approach and we anticipate working with the Expert Panels as well as through ongoing dialogue with policy leads and decision-makers to gather and review appropriate evidence to identify potential SRAs. It is anticipated that the Expert Panels will convene and work collectively to consider both sector-specific and cross-sector issues, however, it may also be necessary to work with an individual sector Expert Panel from time to time.

The process for developing SRAs:

SRA design principles will set out the operational characteristics of each sector in relation to natural resource use and associated risks to future operations. Application of the SRA design principles is intended to help ensure an effective, coherent and consistent approach to the development of SRAs.

Mapping and identification of potential SRAs will be taken forward through a number of inter-related work-packages, which are described below. The work will be informed by and build on wider evidence and research outputs, including emerging Sector Locational Guidance (SLG), the outputs of the Sustainable Management of Marine Natural Resources (SMMNR) project and a Cefas report on potential sector co-existence opportunities.

Potential SRA(s) will, where appropriate, be identified and mapped and a draft **SRA derivation report(s)** prepared, describing the SRA identification process.

Development of SRAs – key work packages

Work will be progressed, in collaboration with stakeholders and the Expert Panels, to identify and develop **sector specific technical and operational considerations** to inform SRA development. In part, this work will develop and apply the data associated with the SRA design principles. Technical considerations could, for example, include parameters associated with accessibility and operational characteristics of the sector relating to natural resource use (e.g. distance to shore, water depth, wave height, seabed type). Outputs to these considerations will be a series of maps describing refinements to resource areas as the different technical constraints are applied.

Sector-sector interactions will also be considered (including potential associated opportunities and constraints) in order to further refine the spatial areas to which policy SAF_02 could be applied.

Approaches to incorporating **environmental considerations** will be developed with stakeholders and the Expert Panels, considering both the stage at which such considerations would need to be applied and the level of application. This could include, for example, a narrative (re-)emphasising WNMP environmental policies, their application, the wider environmental protections/regulations in place, and that SRAs confer no rights of development. **Plan level assessments** will be progressed as appropriate.

Marine Planning Notices (MPNs):

The WNMP (paragraph 62) makes provision for the introduction of supplementary planning documents, including MPNs, which will be a relevant consideration in decision making. As set out in WNMP paragraph 65, SRAs will be introduced and policy SAF_02 activated via the publication of MPN(s).

An MPN will set out the scope and extent of the SRA(s), including details of the safeguarded area(s) of natural resource and the rationale for introducing resource safeguarding for those areas. It will also detail the implementation and application of policy SAF_02 in the (proposed) SRA(s).

The outputs of the SRA development work-packages outlined above will inform the preparation of draft MPN(s) in relation to any proposed SRA(s) which are progressed to consultation. **Draft MPN(s)** will be prepared in line with paragraphs 54 and 64 of the WNMP. We will **consult** upon draft MPN(s) and have regard for representations received in finalising any proposals to introduce SRAs and activate policy SAF_02.

If approved, any **final MPN(s)** will be published, activating policy SAF_02 within the identified SRAs, with maps and iNotes updated on the Marine Planning Portal. The finalised SRA derivation report(s) will also be published.

Annex 1 – Safeguarding of existing activity and resource use

Established activities (both consented and those not requiring a consent e.g. fisheries or tourism and recreation) are important uses of the Plan area which are afforded safeguarding as part of the WNMP. As such, they will be a relevant consideration, amongst other matters, that may have a bearing upon SRA mapping. A wide range of activities already occur in our seas and WNMP policy is clear they must be recognised and respected.

Policy SAF_01 applies to the safeguarding of all sectors (other than Defence, which is afforded specific safeguarding through Policy DEF_01) and aims to safeguard existing activity and resource use.

SAF_01: Safeguarding existing activity

a. Proposals likely to have significant adverse impacts upon an established activity covered by a formal application or authorisation must demonstrate how they will address compatibility issues with that activity.

Proposals unable to demonstrate adequate compatibility must present a clear and convincing case for the proposal to progress under exceptional circumstances.

b. Proposals likely to have significant adverse impacts upon an established activity not subject to a formal authorisation must demonstrate how they will address compatibility issues with that activity.

Proposals unable to demonstrate adequate compatibility must present a clear and convincing case for proceeding.

Under SAF 01 a and b, compatibility should be demonstrated through, in order of preference:

- Avoiding significant adverse impacts on those activities, and/or
- Minimising significant adverse impacts where these cannot be avoided; and/or
- Mitigating significant adverse impacts where they cannot be minimised.

Consented activities, and activities requiring consent for which a formal application has been submitted, can be identified spatially on maps as discrete areas. Policy SAF_01(a) applies to these types of established activities. This policy recognises the investment made by a developer in seeking or gaining a consent and that developer's legitimate expectation to be able to continue, within reason, to operate. A relatively high weighting of safeguarding policy therefore applies.

Existing activities not requiring formal consent require a different approach. These activities are typically diverse and spatially widespread. Nevertheless, it is important that established use is carefully considered in decision making and that any avoidable sterilisation of the resource upon which such activities depend, or any needless displacement of the activity itself, is avoided. Established activities not requiring formal consent can also be identified on maps (albeit with a lower level of confidence and in a different way e.g. 'heat' maps). Policy SAF_01(b) applies in such circumstances and sector mapping can support policy implementation.

Safeguarding Policy SAF_01 ensures that existing activities are clearly and systematically taken into account, at an early stage, by any new proposal which has the potential to adversely impact upon them (an approach largely consistent with current regulatory practice). In some cases, this policy recognises that adverse impact upon established use may be unavoidable. In such a scenario, this policy establishes a hierarchy requiring developers to avoid, minimise or mitigate such impacts or, if this is not possible, to make a clear and convincing case to justify proceeding, in order to ensure an appropriate response by decision makers.

Safeguarding space for future potential use (through SAF_02) is also a consideration for planning, although this involves greater uncertainty with regards to resource distribution and constraints related to resource use, coupled with variable information on sector needs and/or intent. Consequently, a lower weight of safeguarding is appropriate.

Policy SAF_01 can be related to maps describing the distribution of sectoral activities (WNMP paras 246 and 247). Progressing through the SRA identification process may provide opportunities to further identify areas where SAF_01 applies with regard to established uses. Where this is the case, MPN(s) may also include such detail if there is merit in doing so.

Annex 2 – Alignment with the Wellbeing of Future Generations (Wales) Act 2015 and the Principles of Sustainable Management of Natural Resources

The Wellbeing of Future Generations (Wales) Act 2015 (WFGA) requires public bodies to act in accordance with the sustainable development principle to improve the environmental, social, economic and cultural well-being of Wales. The WNMP takes an integrated and holistic approach to sustainable development, respecting established uses and interests whilst looking to secure benefits from new opportunities; recognising the importance of our heritage, ecosystem resilience and the value of biodiversity and supporting the sustainable management of our natural resources.

The development of potential SRAs forms part of the integrated marine planning policy framework set out within the WNMP. Through safeguarding key areas of resource with potential to support future sustainable use, SRA development aims to support the marine economy to respond to societal needs in a sustainable manner, helping to meet long term resource needs whilst ensuring the resilience of the marine environment. SRA development will contribute to the WFGA's seven well-being goals as set out below, and be guided by the five ways of working set out within the WFGA.

Table 1. How SRA Development contributes to the WFGA's seven well-being goals

WFGA Well-being goal	SRA development
A prosperous Wales	Forms part of an integrated, evidence-based and plan-led policy framework which guides fair, transparent decision-making by public authorities and balances environmental, social, economic and cultural considerations.
A resilient Wales	Helps the marine economy to respond to societal needs in a sustainable manner through safeguarding resources with potential to support future sustainable use, including in relation to low carbon energy technologies. Facilitates meaningful and integrated sectoral and environmental planning which balances biodiversity protection with ensuring other socio-economic interests are taken into account.
A globally responsible Wales	Considers, as part of SRA mapping, needs and interests holistically across a range of sectors. Facilitates cross-sector engagement to make sustainable use of natural resources and marine space by encouraging co-existence and avoiding conflict.

WFGA Well-being goal	SRA development
A more equal Wales	Helps the marine economy to support resilient, bilingual coastal communities and respond to societal needs through safeguarding resources with potential to support future sustainable use.
A healthier Wales	Considers, as part of SRA mapping, needs and interests holistically across a range of sectors.
A Wales of cohesive communities	Incorporates, within considerations supporting SRA boundary definition, recognition of the importance of our marine heritage and the significance of our seas, and the recreational opportunities they offer, to our health and well-being and the well-being of our coastal communities.
A Wales of vibrant culture and thriving Welsh language	SRA development will be transparent and inclusive, with potential SRAs subject to public consultation.

SRA development will be closely aligned to and underpinned by the five ways of working set out within the WFGA.

Table 2. The WFGA 5 ways of working and SRA development

5 ways of working	SRA development
Look to the long term so we do not compromise the ability of future generations to meet their needs.	By championing the sustainable use of the marine environment, SRA development focuses on managing activities over the long term. It aims to ensure, through mapping and safeguarding key areas of resource with potential to support future sustainable use, that marine sectors are able to meet their long term resource needs while ensuring the resilience of the marine environment.
Take an integrated approach by considering all Wales' well-being goals.	Welsh Government is taking an integrated and co-ordinated approach to SRA development, considering needs holistically across a range of sectors. SRA development will take account of the inter-relationships between sectors and bring together social, cultural, economic and environmental considerations.
Involve a diversity of the population in the decisions that affect them.	The SRA development process will be transparent and inclusive, underpinned by stakeholder engagement. All potential SRAs will be subject to public consultation. Documentation will be clear and accessible and produced in appropriate formats.

5 ways of working	SRA development
Work with others in a collaborative way to find shared sustainable solutions.	The SRA development process will be transparent and inclusive, underpinned by collaborative working across a range of policy areas and stakeholders. We will work closely with stakeholders, including through the Marine Planning Stakeholder Reference Group (MPSRG) and sector expert panels, to test approaches and work collaboratively to develop and agree solutions.
Understand the root causes of issues to prevent them from occurring and examining whether how we currently deploy our resources should change.	The best available evidence will be applied throughout the SRA development process, taking account of the inter-relationships between sectors and bringing together social, economic and environmental considerations. By identifying key areas of resource with potential to support future sustainable use, SRA development will also seek to optimise coexistence and minimise conflict between sectoral opportunities.

The principles of sustainable management of natural resources (SMNR, as set out by the Environment (Wales) Act 2016) also underpin SRA development.

Table 3. Principles of sustainable management of natural resources and SRA development

Principles of SMNR	SRA development
Adaptive management	<p>The best available evidence will be applied throughout the SRA development process. We will work with stakeholders, including through the MPSRG and sector expert panels, to develop, test and, where appropriate, adapt approaches.</p> <p>Through identifying key areas of resource with potential to support future sustainable use, SRA development seeks to facilitate dialogue between sectors, with the aim of optimising coexistence and minimising conflict between sectoral opportunities.</p>
Scale	We will apply ‘adequacy of scale’ considerations to SRA development, considering a sector’s scale of operation and potential growth rate. To ensure clarity of safeguarding, we will avoid disproportionately complex SRA boundaries and disjointed or fragmented SRA areas, where possible.
Collaboration and engagement	The SRA development process will be transparent and inclusive, underpinned by collaborative working across a range of policy areas and stakeholders, including through the MPSRG and sector expert panels.

Principles of SMNR	SRA development
Public participation	All potential SRAs will be subject to public consultation. Documentation will be clear and accessible and produced in appropriate formats.
Evidence	The best available evidence will be applied throughout the SRA development process. We will work closely with policy leads and stakeholders to ensure we have identified and are using the best available evidence and to validate approaches and analysis.
Multiple benefits	<p>We are taking an integrated and co-ordinated approach to SRA development, considering needs holistically across and taking account of the inter-relationships between sectors, and bringing together environmental, social, economic and cultural considerations.</p> <p>SRA development focuses on ensuring, through mapping and safeguarding key areas of resource with potential to support future sustainable use, that marine sectors are able to meet their long term resource needs while ensuring the resilience of the marine environment. SRA development will also seek to encourage dialogue between sectors on opportunities for co-existence to optimise the use of marine space.</p>
Long term	
Preventative action	
Building resilience	