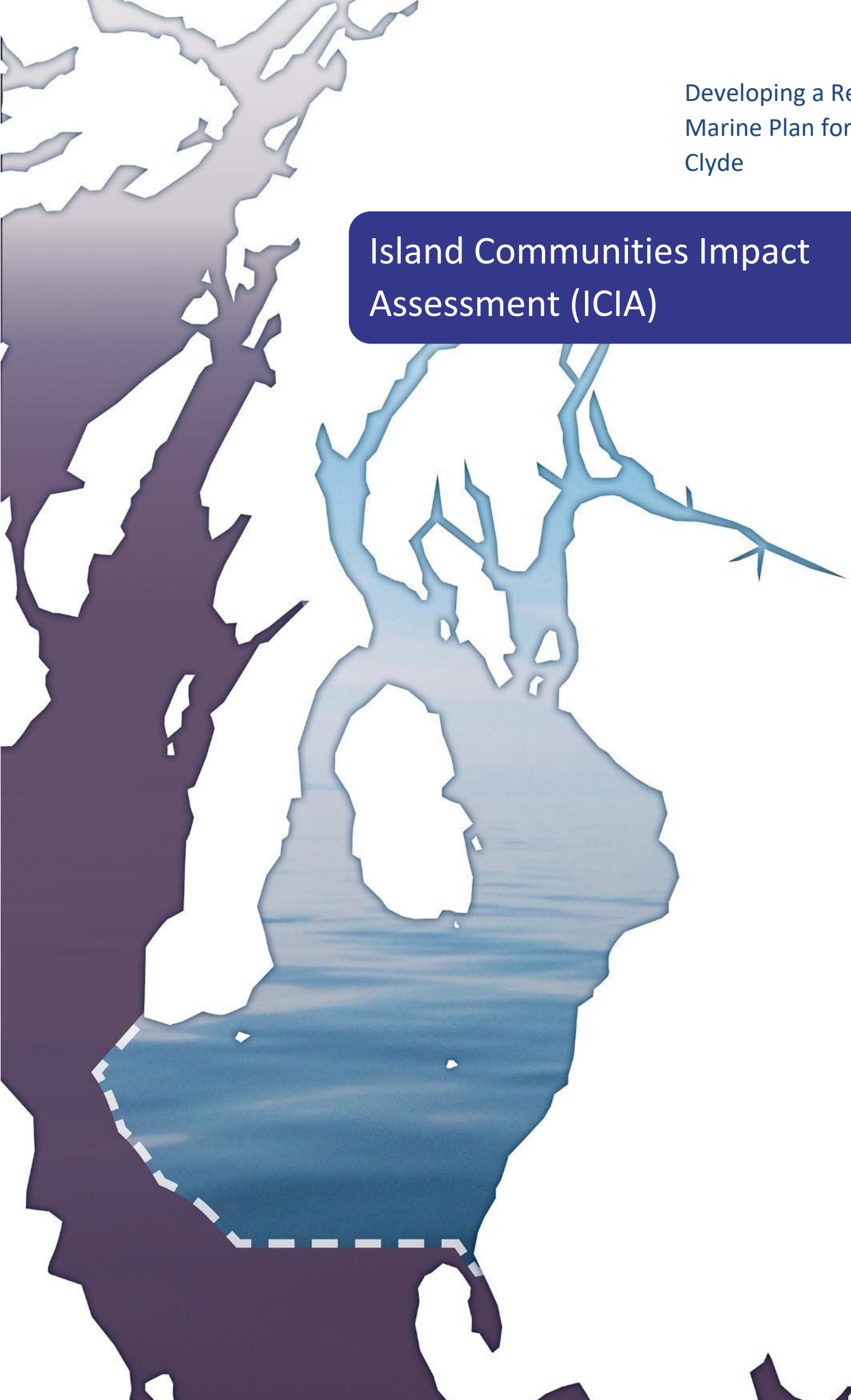
Developing a Regional Marine Plan for the Clyde

Island Communities Impact Assessment (ICIA)



Clyde Marine Planning Partnership
5 Atlantic Quay
7th Floor
150 Broomielaw
Glasgow
G2 8LU

30 September 2026

Version Control

Version no	Date	Authors	Notes
1	17 June 2022	C Cutts	Circulated to members for comment.
2	11 July 2022	C Cutts	Amended based on members' feedback and submitted to Marine Directorate.
3	9 June 2023	C Cutts	Amended based on feedback from Marine Directorate and submitted to Marine Directorate June 2023
4	26 June 2026	J Bunyan & C Cutts	Amended based on Marine Directorate feedback on the draft regional marine plan. Submitted to Marine Directorate for review with draft Clyde Regional Marine Plan June 2026.
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Clyde Regional Marine Plan Island Communities Impact Assessment

Title of Policy	Clyde Regional Marine Plan (CRMP)
Minister(s)	Gillian Martin, Cabinet Secretary for Climate Action and Rural Affairs
Lead official	Clyde Marine Planning Partnership Officer Chris Cutts
Directorate	Marine Directorate
New policy/revision to an existing policy	New policy

Introduction

The Clyde Regional Marine Plan

The Clyde Regional Marine Plan (CRMP) will reflect the requirements for regional marine planning under the Marine (Scotland) Act 2010 and associated Delegation of Functions (Regional Marine Plan for the Scottish Marine Region for the Clyde) Direction 2017.

The CRMP will be in line with Scotland's National Marine Plan (NMP) (2015) and will contribute towards managing the competing demands for the use of the Clyde Marine Region (CMR), while protecting and enhancing the marine environment.

The CRMP will provide a statutory policy framework to support effective decision-making and appropriate inward investment, enabling delivery of the Plan's long-term vision and aims. The policy framework in the CRMP will be used to inform decision-making by public authorities, including in marine licensing and land-use planning (to Mean Low Water Springs).

Policies in the CRMP aim to achieve the Plan's vision and objectives. The Plan's vision is 'The marine and coastal environment of the Clyde Marine Region is clean, healthy, safe, productive and biologically diverse, with improved fair access. It is managed sustainably to support thriving resilient local communities, promote multiple use and allow nature to flourish'.

The Plan also includes recommendations for marine users/local management. These inform the general management of all activities within the Region, including those which are not managed through planning or licensing, such as marine and coastal sport, recreation and tourism.

The key outcomes of the CRMP will be to:

- provide a policy framework that promotes sustainable development in the CMR;
- maintain, and where appropriate, enhance the health of the CMR;
- promote socially inclusive development and use of marine and coastal resources;
- minimise conflicts between the competing demands of different marine users, activities and developers; and
- contribute to the mitigation of, and adaptation to, climate change.

Who will it affect?

The CRMP will affect a range of sectors and groups with an interest in the marine environment. These may include:

- Marine activities/businesses;
- Developers of licensed activities;
- Marine nature conservation, coastal defence and marine heritage activities/conservation;
- Coastal communities and visitors to the Region;
- The Scottish Government (through Marine Directorate's Planning and Licensing functions);
- Local Planning Authorities;
- Regional Marine Planning Partnerships;
- Crown Estate Scotland; and
- The Ministry of Defence

Marine developments and activities have the potential to affect these groups in many ways. For example, coastal communities around the Clyde may benefit economically and socially from

successful local economies based on marine and coastal developments and/or activities, such as fishing, port infrastructure and tourism. However, these communities may also suffer from adverse effects, associated with being close to the marine and coastal environment, like noise pollution, visual intrusion, coastal erosion and flood risk.

What might prevent the desired outcomes being achieved?

The aims of the CRMP relate to climate change mitigation and adaptation, sustainable development, supporting a healthy and biologically diverse marine and coastal environment and supporting the wellbeing of communities around the CMR.

A key challenge for the CRMP will be supporting economic growth of marine industries and activities whilst ensuring growth occurs in balance with the protection and enhancement of the marine environment and historic and cultural heritage. The Plan's vision, aims, objectives, policies and recommendations have been developed in accordance with a set of overarching Guiding Principles which act as a top level filter for plan development. The Guiding Principles are: sustainable development; support delivery of Good Environmental Status; the ecosystem approach; adding value, not complexity; and multiple responsible use of marine space. The CRMP embodies a sustainable approach to planning, development and use of the marine area which should support its successful implementation and enable the aims of the Plan to be met.

The Islands (Scotland) Act 2018

Scottish islands can face particular challenges around distance, geography, connectivity and demography, so it is important that policy makers consider these properly. It is also important that within a plan, islands receive fair and equitable treatment and that policy, strategy or service outcomes are tailored to their circumstances.

The Islands (Scotland) Act was passed by the Scottish Parliament in 2018 and is only one of a handful of place-based pieces of legislation to focus specifically on islands in the world. The measures it contains, like the Island Communities Impact Assessment, are designed to meaningfully improve outcomes for island communities. The provisions in Sections 7 to 14 of the Act came into force on 23rd December 2020.

Section 7 states that a Relevant Authority must have regard to island communities in carrying out its functions. Section 10 sets out how a Relevant Authority demonstrates compliance with the duty imposed by section 7. As an authority delegated by ministerial direction to draft a statutory regional marine plan, the subsequent sections of this document detail the seven step process carried out by the CMPP in carrying out an Island Communities Impact Assessment following published guidance[1].

We would like your views on this draft impact assessment, which is part of the consultation on the Clyde Regional Marine Plan. It is available electronically on the Clyde Marine Planning Partnership website.

Your responses to the consultation questions will help us to finalise this draft Island Communities Impact Assessment of the Clyde Regional Marine Plan. Responses by email should be sent to info@clydemarineplan.scot and responses in writing should be sent to:

Clyde Marine Planning Partnership

[1] Island Communities Impact Assessments: Guidance And Toolkit

5 Atlantic Quay
7th Floor
150 Broomielaw
Glasgow
G2 8LU

Step 1: Develop a Clear Understanding of Plan Objectives

Objectives
The objectives of the Clyde Regional Marine Plan (CRMP), under four distinct headings[2], are to:

Climate change mitigation and adaptation

- Contribute to Scotland's transition to a low-carbon economy.
- Support resilient local communities by taking decisions in the Clyde Marine Region to mitigate and adapt to the consequences of climate change.
- Promote the use of marine and coastal assets in the Clyde Marine Region to respond to climate change issues.

Sustainable development

- Provide a policy and planning framework for safe and sustainable development and use which encourages innovation and attracts future investment in marine and coastal assets in the Clyde Marine Region.
- Provide a plan for decision makers to have regard of when responding tomarine developers on the early identification of localities of most and least constraint, including consideration of potential environmental factors and sectoral interactions.
- Underpin the regeneration of urban coastal areas and support a sustainable economy in rural coastal areas.

Healthy and biologically diverse marine and coastal environment

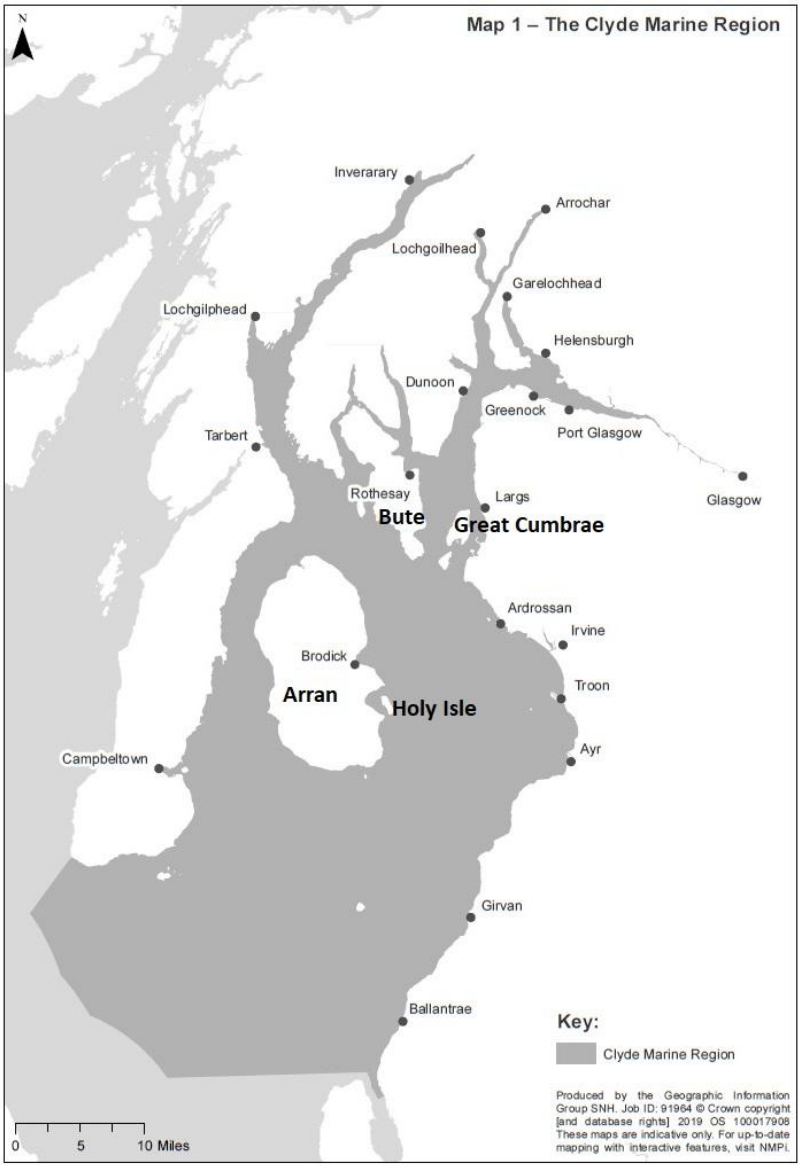
- Maintain and enhance the health of the Clyde Marine Region, including biodiversity and the landscape/seascape, by protecting and improving its natural resources.
- Ensure that development and use of marine and coastal resources contributes to the protection and enhancement of the Marine Protected Area network and identify other opportunities for environmental enhancement.
- Ensure that developments and use of marine and coastal resources contribute to protection and enhancement of the Clyde Marine Region's Priority Marine Features.

Wellbeing of Communities

- Promote sustainable and socially inclusive development and use of marine and coastal resources, including through improvements in access.
- Support the connection of people to the Clyde Marine Region through cultural heritage, work opportunities, educational initiatives and recreational pursuits.
- Contribute to the wellbeing and cultural diversity of local communities.

How are islands identified for the purpose of the policy, strategy or service?
The Islands of the Firth of Clyde are the fifth largest of the major Scottish island groups after the Inner and Outer Hebrides, Orkney and Shetland. They are situated in the Firth of Clyde between Ayrshire and Argyll and Bute. There are about forty islands and skerries. Only four are currently inhabited (Arran, Bute, Great Cumbrae and Holy Isle; Map 1), and only nine are larger than 40 hectares (99 acres). The largest and most populous are Arran and Bute. They are served by dedicated ferry routes, as are Great Cumbrae and Holy Isle, although Holy Isle has no direct connection with the mainland, with visitors and residents catching a ferry from Arran. The ferry routes run summer / winter timetables which impacts accessibility in the winter months. Unlike the isles in the four larger Scottish archipelagos, none of the isles in this group are connected to one another or to the mainland by bridges.

[2] All objectives have equal priority and should be considered in combination.



Map 1: The Clyde Marine Region as defined by the Scottish Marine Regions Order 2015, with populated islands labelled.

What are the intended impacts/outcomes and how do these potentially differ in the islands?
The vision of the Regional Marine Plan is for the Clyde Region to be clean, healthy, safe, productive and biologically diverse, with fair access for all. It is managed to ensure sustainable multiple use which enables nature to flourish and supports thriving resilient local communities. It is not envisaged this will differ in the Clyde Islands.

Is the policy, strategy or service new?
Yes.

Step 2: Data Gathering and Stakeholder Identification

What data is available about the current situation in the islands?
The 'Firth of Clyde Socio-Economic Review' (2008)[3] collated baseline data relating to the economic activity and community use of the marine area including the islands. In 2017 the economic data was updated in the 'Clyde Marine Region State of the Environment Assessment'[4]. It also mapped known environmental features and provided information on trends, where available. Data was gathered from national and local data sets, as well as interviews with key stakeholders e.g. fishers, businesses and community groups.

How does any existing data differ between islands?
Most data sets are only available at a local authority level. Different levels of marine dependence are seen across the islands, since they all demonstrate significant marine tourism offerings and fishing activity (on Arran and Bute). In addition, the Arran Outdoor Education Centre offer a range of outdoor activities to schools and other groups.

Are there any existing design features or mitigations in place?
Policies exist within the CRMP to protect communities and existing users. In addition, critical infrastructure i.e. ferry routes and terminals, water and electricity cables are protected.

Step 3: Consultation

Who do you need to consult with?
Community groups and marine stakeholders. Consultation with these groups has taken place during each of the CRMP development phases. The draft CRMP has been developed by the Clyde Marine Planning Partnership, which consists of over 20 Members. Wider stakeholders have been involved in plan development through sectoral working groups and issue-based workshops. The general public has also been engaged throughout plan development, such as through public dialogue sessions and public engagement events during the pre-consultation.

How will you carry out your consultation and in what timescales?
A pre-consultation of the draft CRMP took place between 18 March 2019 and 27 May 2019, including five public events on islands at Brodick and Lamlash (Arran), Rothesay Museum and Library (Bute), and Millport (Great Cumbrae). This consultation received 49 responses from a wide range of marine sectors and stakeholders. Table 1 summarises the various groups who responded to this consultation overall.

Table 1: *Number (n) and type of respondents received on draft Plan pre-consultation.*

Respondent group	n	%
Individuals	24	49
Aquaculture	3	6
Environment / conservation	2	4
Fisheries	3	6
Industry / transport	2	4

[3] https://bit.ly/3N1aNW0
[4] https://bit.ly/3xi830E

Planning authority	6	12
Local group	1	2
Other public sector / bodies	5	10
Recreation / tourism	2	4
Other	1	2
Total	49	100

What questions will you ask when considering how to address island realities?
Stakeholders were asked to identify opportunities and challenges facing their marine environments, covering economic activities, social use and the environmental features.

What information has already been gathered through consultations and what concerns have been raised previously by island communities?
The contribution of marine tourism to island, rural and fragile communities is well recognised[5]. In terms of contribution to the economy, total marine tourism turnover in the Region was £245.4M in 2017 and employment was 7,200[6]. Marine sport, recreation and tourism can act as a driver to support economic regeneration in coastal and island economies.

Ferries are vital to the communities around the CMR. Approximately 2.5 million[7] passengers (2021) use ferry services connecting communities in the Clyde and providing links to the islands of Arran, Bute and Cumbrae.

The marine economy and society of the Region face existing pressures, and these include: employment (particularly in remote coastal areas and for some island communities) and job opportunities, potential for conflict between sectors, competition for space and accessibility and connectivity for remote and island communities. The vision, aims and guiding principles of the draft Plan seek to deliver sustainable development within the region, which in turn supports productive and thriving island communities, while allowing nature to flourish and protecting the natural resources on which many marine industries rely. This goal can present tensions between economic productivity and environmental protection and enhancement. However the policies of the CRMP support sustainable development and the draft Plan contributes to the marine management framework.

Island communities responded to the pre-consultation and raised a number of regional issues: concerns were raised about the visual impact of fish farms in relation to designated areas and islands, especially with regard to tourism, landscape and seascape, and on the need to maintain/remove existing structures. The pre-consultation demonstrated that this was a common strand from coastal communities throughout the Clyde and not specific to island communities; policies SCAPE 1-3 (developments to consider landscape, seascape and character of the CMR) and objective AQUA 1 (Sustainable development and diversification of the aquaculture sector in appropriate locations) were drafted to mitigate against this on a Clyde scale. Furthermore, issues were raised on sea fisheries, namely the inclusion of the Lamlash Bay No Take Zone on Arran. Following this, the No Take Zone was included in the plan's natural heritage maps. Also, concern was noted about ferry services and lack of consultation with islanders on terminals e.g. Arran residents are finding they no longer have a reliable and resilient service as getting cars booked on at short notice, for example for hospital appointments or funerals, is becoming harder as tourism increases. Policy SHIP 3 of the CRMP therefore supports initiatives that will improve connectivity between the

[5] Giant Strides, Scotland's Marine Tourism Strategy for 2020-2025 (https://bit.ly/39ZvBuk)
[6] Scotland's marine economic statistics 2017, Section 11 Marine Tourism, Table 17 (https://bit.ly/3coN14n).
[7] Scottish Transport Statistics 2022; Chapter 9 – Water Transport. Ferry routes included in this figure: Wemyss Bay – Rothesay, Ardrossan – Brodick, Claonaig – Lochranza, Largs – Cumbrae, Colintravie – Rhubodach, Tarbert – Portavadie, Ardrossan – Campbeltown, Gourock – Dunoon (https://bit.ly/3NeDWk3).

Kintyre peninsula and the islands with the rest of the CMR and is also considered in the National Islands Plan: Implementation Route Map 2022[8]. Policy CONNECT 1 also states that applications for development and/or activities demonstrate that relevant sectoral stakeholders and the general public have been consulted; this will include applications relating to ferry terminals.

Is your consultation robust and meaningful and sufficient to comply with the Section 7 duty?
Yes

Step 4: Assessment

Does your assessment identify any unique impacts on island communities?
In common with an Island Communities Impact Assessment, a core Sustainability Appraisal objective is to 'Maintain or improve accessibility and connectivity of coastal and island communities', and so the draft Plan's objectives and policies have been considered against this objective throughout plan development, the pre-consultation, and improvements to the draft plan thereafter. Other objectives in relation to society as a whole and including island communities e.g. an early consideration of whether the plan is likely to have an effect on an island community which is significantly different from its effect on other communities have been included in plan development.

As background information it may be useful to note that early policy ideas generated and discussed with/by stakeholders at working group meetings were considered against the areas of: Economy, Society, Environment, and climate change mitigation and adaptation. Socio-economic benefits to island communities were raised in terms of aquaculture activity (e.g. Objective AQUA 1: Sustainable development and diversification of the aquaculture sector in appropriate locations within the environmental carrying capacity of the CMR, providing socio-economic benefits to rural areas and islands and supporting the wider supply chain in Scotland).

In addition to socio-economic impacts, the pre-consultation responses highlighted concerns from island communities regarding ferry connectivity (see above). Policy SHIP 3 therefore supports initiatives that will improve connectivity between the Kintyre peninsula and the islands with the rest of the CMR, In addition, Chapter 8: *Connecting People to the Clyde Marine Region* was introduced partly based on feedback from the public during the pre-consultation process to mitigate against these concerns at that stage of the plan development process, and supports meaningful engagement in consultation processes and maintaining access / connecting people to the Region, including island communities.

Climate Change policies within the plan ensure that any development or activity which relates to the accessibility and connectivity of coastal and island communities that may be impacted by climate change in the future will be maintained and that recreational access and quality of experience is also maintained.

The objectives, policies and recommendations in the *All Sectors* chapter (Chapter 9) and the *Shipping, Ports, Harbours and Ferries* chapter (Chapter 13) where they are implemented can maintain or improve the accessibility and connectivity of island communities; can promote access to coastal and marine resources for tourism and recreation and there could be maintenance and improvement to the experiences of recreational users of the marine and coastal environment, both in terms of access and quality of experience.

[8] National Islands Plan: Implementation Route Map 2022 (https://bit.ly/42vKEqc)

Therefore, although there are issues for island communities, especially around connectivity, there are no negative impacts to island communities identified from the plan itself. In fact, positive impacts include enhanced long-term management of the marine environment and protecting economic and cultural uses of the marine environment.

Does your assessment identify any potential barriers or wider impacts?
No

How will you address these?
You must now determine whether in your opinion your policy, strategy or service is likely to have an effect on an island community which is significantly different from its effect on other communities (including other island communities).
If your answer is NO to the above question, a full ICIA will NOT be required and you can proceed to Step Six. If the answer is YES, an ICIA must be prepared and you should proceed to Step Five.

To form your opinion, the following questions should be considered:

Does the evidence show different circumstances or different expectations or needs, or different experiences or outcomes (such as different levels of satisfaction, or different rates of participation)?
No

Are these different effects likely?
n/a

Are these effects significantly different?
n/a

Could the effect amount to a disadvantage for an island community compared to the mainland or between island groups?
n/a

Step 5: Preparing the ICIA

n/a: no negative impacts to island communities from the plan were identified. Positive impacts include enhanced long-term management of the marine environment and protecting economic and cultural uses of the marine environment. As mentioned above, Policy SHIP 3 of the CRMP was drafted to support initiatives that will improve connectivity between the Kintyre peninsula and the islands with the rest of the CMR, and Policy CONNECT 1 also states that applications for development and/or activities demonstrate that relevant sectoral stakeholders and the general public will be consulted; this will include applications relating to ferry terminals.

To conclude, the plan has been developed to generate positive outcomes for the island communities (as evidenced in the relevant sections) and there are no further mitigations identified because the effects identified have all been positive.

Step 6: Making Adjustments to our Work

Should delivery mechanisms / mitigations vary in different communities?
Engagement opportunities (interviews, surveys, community council meetings, online consultation and public meetings) have been used to ensure a range of opportunities to engage and gather data. Policies exist within the CRMP to protect communities and existing users. In addition, critical infrastructure i.e. ferry routes and terminals, water and electricity cables are protected, therefore certain policies allow for area specific consideration.

Have island circumstances been factored into the evaluation process?
How the Plan is used will be monitored, and where possible will be split by area, including islands (e.g. Arran, Bute, Cumbrae).

Have any island-specific indicators / targets been identified that require monitoring?
No, since there are no negative impacts identified from the plan. However, it will be possible to monitor the number and type of marine licensing applications received for each island area and the impacts or comments received on marine licensing applications from specific groups of users (fishers, island communities *etc*).

How will outcomes be measured on the islands?
The number and type of marine licensing applications received for each island area will be monitored, and the impacts or comments received on applications from specific groups of users (fishers, island communities *etc*) recorded.

How has the policy, strategy or service affected island communities?
The plan has not been approved or adopted by Ministers yet, however there is no envisaged disproportionate negative impact to island communities. The Marine (Scotland) Act 2010 allows for the monitoring and reporting of implementation of the plan every five years. Any effects of the plan being implemented will be captured within this reporting.

How will lessons learned in this ICIA inform future policy making and service delivery?
The lessons learnt from the ICIA will feed into the next edition of the Plan and relevant local development plans.

Step 7: Publishing the Plan ICIA

Have you presented your ICIA in an Easy Read format?
Yes

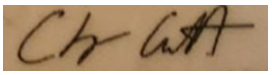
Does it need to be presented in any other languages?
No, however can be requested if required.

Where will you publish your ICIA and will relevant stakeholders be able to easily access it?
It will be published on the CMPP website, and will also be available in print on request to the CMPP address at the top of this document.

Who will sign-off your final ICIA and why?
Scottish Ministers as they are responsible for the Clyde Regional Marine Plan's approval.

ICIA completed by:
Dr. Christopher Cutts

Position: Clyde Marine Planning Partnership Officer

Signature:  Date completed: 30th September 2026

ICIA signed off by:
Prof. Anthony Gallagher

Position: CMPP Chair

Signature: Date completed: 30th September 2026