

# PENTLAND FIRTH AND ORKNEY WATERS MARINE SPATIAL PLAN: PLANNING ISSUES AND OPTIONS PAPER

## Consultation Response: Marine Biopolymers Limited

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### CONSULTATION QUESTIONS

#### Section 4 - Legal and policy context

Question 1: Are there other legislation, policies or plans not identified in Table 4.1 and Annex 3 that should be considered in the development of the Pilot Pentland Firth and Orkney Waters Marine Spatial Plan?

I don't think there is anything missing as such – it is a long and bewildering list, but the point I want to make is that within the context of all plans, then some space or consideration needs to be include or made available in respect of Seaweed, whether natural stocks of, or cultivated. Seaweed, and particularly its exploitation via e.g. harvesting could be seen as a bit of a “grey area”

#### Section 5 - Knowledge and evidence to underpin the plan

Question 2: Is there other information that you think should be used to inform the development of the marine spatial plan for Pentland Firth and Orkney Waters?

See comment above – information about natural seaweed stocks and/or the adoption, and implications of (e.g. in sea area use terms), cultivated seaweed, often called Mariculture (this would be with a future horizon of say 10 years), should be included. As far as natural seaweed stocks are concerned, Orkney has probably the best and most concentrated stocks, within a finite area, in the whole of the British Isles. Going back 200 years, there was a substantial seaweed using industry on Orkney – that has long since gone, but the seaweed is still there and it is currently completely unexploited

#### Section 6 - The purpose, users, status and spatial extent of the pilot plan

Question 3: Considering paragraph 6.5, are there other stakeholder engagement and governance related issues that should be investigated through the pilot marine planning process?

I think that all the possible frameworks are in place, but please simply consider all aspects that have relevance in terms of Orkney & Pentland resources – make sure the scope includes all meaningful resources - back to the point on seaweed

Question 4: Do you agree with the identified purposes and users of the marine spatial plan set out in Section 6? Are there additional or alternative purposes or users of the plan that should be considered?

I think the list is inclusive but please make sure under Business and Individual examples you include seaweed harvesting and local added value conversion and also seaweed cultivation

Question 5: Should the existing Pilot Pentland Firth and Orkney Waters Marine Spatial Plan boundary be realigned with the boundaries of the proposed Scottish Marine Regions or do you think the existing 'strategic area' boundary is appropriate? (Refer to Figures 5 and 6)

The Figure 6 proposal looks to be perfectly good – the main thing is that there should ultimately be consistency of approach, as well as good agreement between parties, across the entire Scottish waters area covered by Scottish Marine Regions

Question 6: How should the pilot plan and/or marine planning process facilitate and support integration between the terrestrial and marine planning systems? (See paragraphs 6.16 – 6.17).

I am no expert in the mechanism for doing this, and there needs to be either a body with a final say e.g. relevant councils or a small committee (I can't think of a better name sorry) with the final say, but the point is that there needs to be an integrated approach such that business developments can be viewed from an overall perspective. This would help improve the chances of (marine) business ventures going ahead, and also in adding value locally to e.g. the Orkney economy – all must be done to encourage "local value added" and not simply have the exporting of raw materials. If both a marine part and a terrestrial part (of a proposed development) are key to its success, then the planning process should facilitate an overall evaluation as opposed to a part by part evaluation

Question 7: How should the adjoining terrestrial areas be mapped in the pilot marine spatial plan? Do you agree with the proposed key principles set out at paragraph 6.18?

They seem sensible although there might be some comments relating to any terrestrial industrial developments which would have, not necessarily harmful, but impactful discharges into the marine environment. SEPA might be the best entity to comment on this but perhaps especially sensitive terrestrial/marine vicinity areas could be highlighted

## **Section 7 The guiding principles and themes that will inform the development of the marine spatial plan**

Question 8: Are the guiding principles and themes identified in Section 7 appropriate? Are there other guiding principles and themes that should inform the development of the pilot marine spatial plan?

I think that the paragraphs in Section 7 set out the principles very well

## **Section 8 Strategic Vision, Aims and Objectives**

Question 9: What is your vision for the future of the Pentland Firth and Orkney waters area? What would you like the area to be like in 20 years time?

I would like to see a balanced situation in the Pentland/Orkney waters area – by that I mean that all the key aspects regarding current and future developments (or even non-developments if they would cause problems) should have, and know their place, within the total Marine environment. The danger will be if any one single activity or priority becomes imbalanced vs. the rest – that would not only stoke up resentment but would probably lead over the longer term to unintended harmful consequences. I have no objections whatsoever to Marine Renewables development, but there is a danger that it could overwhelm other economically beneficial activities in the area. Nature also has a habit of “biting back” so great care needs to be taken to achieve and retain a dynamic but manageable balance

Question 10: Are there existing marine activities that you think should be safeguarded now and into the future? For example, commercial fisheries, ferry services and recreational activities.

Provided that these existing marine activities have a measurable benefit, in economic and social terms, and that they are not damaging to the environment (especially), then all existing activities indicated e.g. inshore fishing, ferry transport, allowed recreation activities should be reasonably safeguarded but that should not be to the detriment of other future developments, which may or may not even have been currently envisioned or identified, which might have better benefits for the community and the environment. It is important that a degree of dynamics is encouraged

Question 11a: How should the protection and/or enhancement of the natural environment be considered in the marine spatial plan?

The protection of the natural environment, and note that that may include some developments over time which people might not like but it is nature taking its own course, should be a guiding principle for all. Economic activity can't overrule all considerations but any development with a clear and unacceptable detrimental

effect should neither be allowed or encouraged

Question 11b: [Is the protection of the natural environment important? How important is it?](#)

Please indicate on a scale of 1-5 (1 = Not important at all, 5 = The highest importance)

1       2       3       4       5

Question 12a: [How should the protection and/or enhancement of historic and culture resources \(e.g. Scapa Flow wrecks\) be considered in the marine spatial plan?](#)

I am no expert in this area but they should all be given due consideration in the plan and in the context of any future developments

Question 12b: [Is the protection of the historic and culture environment important? How important is it?](#)

Please indicate on a scale of 1-5 (1 = Not important at all, 5 = The highest importance)

1       2       3       4       5

Question 13a: [How should the promotion and support of economic growth be considered in the marine spatial plan? If any, which economic activities would you like to see grow and develop?](#)

It needs to be a key element of the plan in that responsible economic development will underpin the future economic success and stability of the region. Economic development, in the Orkney/Pentland context, could mean various things, and tourism could be considered as relevant and important as new industries. New businesses which intend to develop in the context or framework of the plan and its key principles (respect for the environment, sustainability etc) need to be supported and encouraged, especially those which create highest added value for the community

I have a frequently articulated view on development which centres on the need to add value locally, especially through new and high value manufacturing activities which will have a long term future

I would like to see the “seaweed industry” in its broadest sense included in the scope of the (economic) activities within the scope of the plan, whether existing or potential for the future (the seaweed will always be there) – our goal would be to see an integrated renaissance of the region’s seaweed industry, with relevant outputs such as seaweed for foods or seaweed components produced locally. There is the potential to create a local seaweed industry of the scale of £50 m pa in business revenue terms, and this would be a sustainable and valuable contribution to the region’s economic future

Question 13b: [Is promoting and supporting economic growth important?](#)

Please indicate on a scale of 1-5 (1 = Not important at all, 5 = The highest importance)

1       2       3       4       5

### Section 9 Identifying strategic issues and interactions

Question 14: [Having considered Table 9.1, do you have any views on the identified aspirations for growth, strategic issues and opportunities to address the strategic issues in the pilot marine spatial plan?](#)

I have no issue with the Strategic Issues identified in the table, or with the associated commentary but I would point out the omission of any mention of the “seaweed industry”. Whether you would want to call that Mariculture (although that implies deliberate cultivation of seaweed as opposed to making sustainable use of natural stocks), as a convenient overview name, or the Seaweed Industry is a moot point, although the latter is more accurate

There is clearly potential for conflict between some of the developing economic priorities, but I believe that re-development of a sustainable seaweed industry in the region would work well alongside some activities such as Marine Renewables

It should be noted that, in the historic past, and based on details in historical texts, up to 100,000 (wet) tonnes p.a of seaweed was harvested in Orkney alone – that could, if re-established, lead to businesses with annual revenues exceeding £50 m pa on the assumption of adding value to the seaweed locally. The economic impact to the local economy, although not as large as the above number would probably be of some £25m pa into the local economy

Question 15: [Having considered Table 9.2, do you have any views on the identified potential for interaction between the various sectors, what these interactions might be and how these interactions should be addressed in the pilot marine spatial plan?](#)

The ones shown in the table make eminent sense to me, and I am not qualified to comment on the extent and scale of the interactions identified

I would simply say again that another category i.e. Seaweed Industry should be included, given its potential scale and economic impact, and the interactions arising worked out – probably similar to those of Aquaculture and Commercial Fisheries, but with some notable differences, and also depending on the exact nature of any industry that would develop

## Section 10 Spatial strategy and information

Question 16: Do you think it is important to have an overarching spatial strategy? If so, what should the strategy include and why?

Especially in the Orkney part of the region, with its myriad islands and extended coastlines, it is key to have an overarching spatial strategy which is a baseline reference for all parties. It should perhaps not be as black and white as indicating “do’s and don’t’s” or “can’s and can’t’s” but it would certainly be very beneficial for e.g. any new business proposing a development with a marine aspect to be aware of the local situation, and, if considered to be developed, and subsequently managed carefully over the longer term, fairly and with due consideration for all, it would be a very valuable document/tool (whatever one wants to call it)

## Section 11 Crosscutting or overarching marine planning policies

This section of the Consultation Questionnaire seeks your views on the proposed policy options set out in Section 11 of the Planning Issues and Options Paper. Please indicate in the proposed policy option response boxes below which proposed policy you are commenting on and provide any comments on the preferred option and/or alternative approach, as appropriate. The proposed policies are:

Proposed Policy 1a: Sustainable Development  
Proposed Policy 2a: Integrating marine and coastal development  
Proposed Policy 3a: Nature conservation designations  
Proposed Policy 3b: Protected species  
Proposed Policy 3c: Wider biodiversity and geodiversity interests  
Proposed Policy 3d: Non-native species  
Proposed Policy 3e: Landscape and seascape  
Proposed Policy 4a: Cultural and Historic Environment  
Proposed Policy 5a: Water environment  
Proposed Policy 6a: Coastal erosion and flooding  
Proposed Policy 7a: Waste management and marine litter  
Proposed Policy 8a: Safeguarding existing pipelines, electricity and telecommunications cables  
Proposed Policy 9a: Hazardous development and Health and Safety Executive consultation zones  
Proposed Policy 10a: Defence

### Proposed Policy Options - Response Box 1

Please indicate which proposed policy you are commenting on:

All policies – I am in agreement with the Preferred Option proposed for all Policies

Please provide your comments on the proposed preferred option and/or alternative approach:

Comments

Would you suggest an alternative approach?

Comments

### **Proposed Policy Options - Response Box 2**

Please indicate which proposed policy you are commenting on:

Comments

Please provide your comments on the proposed preferred option and/or alternative approach:

Comments

Would you suggest an alternative approach?

Comments

### **Proposed Policy Options - Response Box 3**

Please indicate which proposed policy you are commenting on:

Comments

Please provide your comments on the proposed preferred option and/or alternative approach:

Comments

Would you suggest an alternative approach?

Comments

#### **Proposed Policy Options - Response Box 4**

Please indicate which proposed policy you are commenting on:

Comments

Please provide your comments on the proposed preferred option and/or alternative approach:

Comments

Would you suggest an alternative approach?

Comments

#### **Proposed Policy Options - Response Box 5**

Please indicate which proposed policy you are commenting on:

Comments

Please provide your comments on the proposed preferred option and/or alternative approach:

Comments

Would you suggest an alternative approach?

Comments

Should you wish to respond to further proposed policy options please provide your response on an addition page(s) and submit with your completed Consultation Questionnaire.

#### **Further crosscutting / overarching policy areas**



Question 17: Are there other crosscutting / overarching policy areas that should be addressed in the marine spatial plan?

None that I can think of

## 12 Sectoral policies

This section of the Consultation Questionnaire seeks your views on the proposed policy options set out in Section 12 of the Planning Issues and Options Paper. Please indicate in the proposed policy option response boxes below which proposed policy you are commenting on and provide any comments on the preferred option and/or alternative approach, as appropriate. The proposed policies are:

- Proposed Policy 11: Marine renewable energy
- Proposed Policy 12: Electricity infrastructure to support marine renewable energy projects
- Proposed Policy 13: Shipping, Navigation and Marine Safety
- Proposed Policy 14: Ports and harbours
- Proposed Policy 15: Oil and Gas
- Proposed Policy 16: Marine aggregates and dredging
- Proposed Policy 17: Development of coastal protection and flood defence infrastructure
- Proposed Policy 18: Development of new telecommunication cables
- Proposed Policy 19: Commercial fisheries
- Proposed Policy 20: Aquaculture
- Proposed Policy 21: Tourism and recreation

### Proposed Policy Options - Response Box 6

Please indicate which proposed policy you are commenting on:

I have no comments re these Policies – the Preferred Options suggested for each all look to be eminently sensible

Please provide your comments on the proposed preferred option and/or alternative approach:

Comments

Would you suggest an alternative approach?

Comments

### Proposed Policy Options - Response Box 7

Please indicate which proposed policy you are commenting on:

Comments

Please provide your comments on the proposed preferred option and/or alternative approach:

Comments

Would you suggest an alternative approach?

Comments

### **Proposed Policy Options - Response Box 8**

Please indicate which proposed policy you are commenting on:

Comments

Please provide your comments on the proposed preferred option and/or alternative approach:

Comments

Would you suggest an alternative approach?

Comments

### **Proposed Policy Options - Response Box 9**

Please indicate which proposed policy you are commenting on:

Comments

Please provide your comments on the proposed preferred option and/or alternative approach:

Comments

Would you suggest an alternative approach?

Comments

## Proposed Policy Options - Response Box 10

Please indicate which proposed policy you are commenting on:

Comments

Please provide your comments on the proposed preferred option and/or alternative approach:

Comments

Would you suggest an alternative approach?

Comments

Should you wish to respond to further proposed policy options please provide your response on an addition page(s) and submit with your completed Consultation Questionnaire.

## Further sectoral policies

Question 18: [Are there other sectoral policies that should be developed in the marine spatial plan?](#)

Yes – there should be a Sectoral Policy covering the Seaweed Industry in its widest context, whether that involves use of Natural Stocks, or Mariculture, which is the typical term used for seaweed cultivation. In the context of the Marine Plan, it is probably the seaweed harvesting activities that would have most relevance, and also the most interactions with other sectors

## Further comments or opinions

Question 19: [Do you have any further comments or opinions in relation to the preparation of the Draft Pilot Pentland Firth and Orkney Waters Marine Spatial Plan?](#)

None apart from saying that it should become a vital reference for all interested and impacting parties and that care needs to be taken to make sure it is maintained and adjusted as relevant in future – it needs to be a dynamic plan in that respect