

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

Consultation Response: Orkney Fisheries Association

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?

Individual and collective well being as measured by the ONS.

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?

The development of a comprehensive pilot marine spatial plan should also be based on an understanding of the locations of spawning and nursery grounds for Orkney's key commercial shellfish species. This is currently a critical gap in knowledge which places the sustainability of Orkney's fisheries at risk from marine developments.

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?

Emphasis should be placed on identifying and addressing potential barriers to participation for different stakeholder groups.

A comprehensive stakeholder analysis conducted early on in the planning process could be useful in determining opportunities for improving relationships between certain stakeholder groups. This would facilitate progress towards a common vision for the sustainable development of the PFW.

It will be useful to establish definitions for the roles and responsibilities of the Working Group, Advisory Group, statutory and non-statutory stakeholders and the wider public to avoid any mismatches between expectations for participation and outcomes.

Further to that, linear and discrete identification of 'stakeholder' can be too narrow in an island context where social, economic and identity boundaries are blurred and much more holistic in nature. Many islanders have multi-faceted roles within their

communities and are part of other contexts as well as their professional definitions. A fisherman can have several stakeholder interests, as an exploiter of the sea for its wild stocks, a lover of the environment, a part-time earner from tourism, and as some-one who appreciates natural and wild beauty. Many islanders would consider themselves as defined by their occupation but also their multi- faceted 'islandness'.

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?

Yes.

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)

From an Orkney Fisheries perspective either of the boundary options would be suitable as most of our fleet operates within inshore areas however for logical and effective management and operation of the Orkney Fishery a discrete Orkney boundary would work best which did not include parts of the Scottish Mainland.

We understand that other sectors might wish to adopt the strategic area option to minimise bureaucracy should their activity cross more than one SMR.

The strategic area will potentially incorporate the boundaries of two IFGs, The North West IFG and the Moray Firth IFG as well as the proposed Orkney Management Model. Although the Orkney management model is still embryonic, the plan should none the less make clear the relationship between the IFGs and the marine planning body and highlight the opportunities for area fisheries management plans to complement the marine spatial plan.

A map highlighting the boundaries of the IFGs should be incorporated into the marine spatial plan when these have been confirmed.

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).

The pilot plan should attempt to build on and reinforce existing terrestrial policies while recognising that the latter can never be a simple duplicate of the multidimensional and dynamic nature of the water column the sea surface and the sea bed.

Extensive involvement of coastal stakeholders in the preparation, implementation and evaluation of the marine spatial plan will ensure successful integration of the two planning systems.

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?](#)

We agree in principal with the proposals with the addition that small local ports like Tingwall, Longhope, Pierowall, Kettletoft, Burry and St Margaret's Hope, which support key small fishing fleets should be recognised and protected for their strategic locations in supporting fishing from both a commercial, socio- economic and safety perspective. Safe reach to fishing grounds and safe radius from port with the limiting factors of vessel size, geographic exposure and gear carrying capacity are factors which link these strategic ports to the different sea environments they serve. These small ports represent an important land-sea link which is not protected in legislation or planning.

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?](#)

These are all appropriate.

We welcome that the 'creation of sustainable communities able to manage and use resources efficiently' will be a key aim underpinning the objective and policies included in the plan. The pilot plan must recognise that societal benefits associated with the commercial fishing industry are particularly heightened in remote, rural and island communities. As such, any development that results in the shrinkage of the industry will not be in accordance with the principle of sustainable development.

In line with the above, islands in particular require, because of their physical unconnected status as opposed to mainland linked coastal areas require, to retain the infrastructure and embedded skills within their populations that enable them to collectively to continue with a core ability to be self-sufficient in the event that external factors prevent food supplies in particular from reaching the islands from elsewhere. Increased dependence on external supplies which are a facet of modern-living undermines island sustainability which can easily be threatened natural events such as weather or man-made events such as conflict or industrial disputes.

We would recommend including food security as another of the guiding principles

of the plan. We must recognise that fish and shellfish are healthy and nutritious food sources which have a significant role to play in contributing to a healthy and balanced diet for our growing population. Global climate change is predicted to reduce the productivity of farmland and increase the volatility of global food supply. Achieving food security in Europe requires a focus on meeting our food demand from sustainable, local sources. Seafood is the largest sector of Scottish food exports; Scotland therefore has a well-established presence and market strength in the sector. In particular, products bearing the 'Orkney' brand are achieving international recognition as being of a high quality, sustainable standard. The plan should aim to build on this.

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?*

A highly sustainable commercial inshore fishery with its own 'bottom up' governance over both wild fin-fish, shellfish stocks and effort where sufficient economic returns and status of the industry are such that young people are keen to join the industry. A renewed confidence and affirmation of the importance of fishing. An environment of minimal disruptive industrial permanence.

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.*

The commercial fishing industry is a long-standing and established entity in the Orkney Islands and therefore integral to island identity. Fishing provides practical and rewarding autonomous jobs for the traditional working sector of the population. As well as providing more than 370 direct jobs on vessels, the Orkney fishing sector supports many inshore activities too. For example the crab processing factory run by The Orkney Fisherman's Society employs around 70 people. A similar factory in Westray provides around 20 jobs. These jobs must be safeguarded now and into the future to maintain the viability and cohesiveness of communities in Orkney.

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

A healthy, functioning marine ecosystem is the foundation upon which many marine industries are based. The pilot plan should ensure that any development in the marine environment does not adversely impact on protected species or habitats or those with a commercial value.

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?

The sea is a corrosive and at times violent environment and therefore protection in a terrestrial sense can only be very limited.

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?

Economic growth requires removing the burdens from businesses and individuals to be able to prosper. For fisheries, increased development in the marine environment could potentially cause displacement of fishing effort and/or exclusion from important fishery grounds. Combined with increasing fuel prices and volatile market prices for catches, the prospects for innovation and growth in this sector are not looking good. There needs to be a clearer understanding of how the fishery operates in Orkney as well as the social context in which it is embedded. For example, despite their not making a significant economic return, many fishermen continue to fish because it represents a family tradition or because they enjoy the level of autonomy they have over their job. We recommend making the fishing industry in Orkney a local strategic priority and propose that all future growth in the marine environment is located, designed and managed in a way that does not adversely impact on it.

It is also relevant to note that GDP is now no longer the sole indicator of a country's economic success and the Office for National Statistics now rates

'wellbeing' as a significant national policy goal.

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?*

Commercial Fisheries

Strategic issues:

Knowledge gap on the effects of climate change on commercial fish stocks and fishing activity including how this in turn will affect quotas for fish.

Opportunities to address strategic issues:

Provide a policy framework that ensures the interests of commercial fisheries are **safeguarded** when assessing consent applications for new development.

Promote the conservation, enhancement and restoration of commercial stocks and their supporting habitats within the PFOW.

Ensure that fishermen maintain the flexibility to be able to respond to the effects of climate change on their stocks in terms of quotas gear types and diversification.

Opportunity to highlight the strategic importance of fishing for meeting the growing demand for food.

Ensure that local fishermen have a strong voice in the sustainable development of the PFOW.

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?*

Biodiversity and Natural Heritage:

Intermediate to low interaction

It would be useful to note in the pilot plan that the impacts on marine biodiversity vary between gear types (e.g. creeling is very low-impact).

Maintaining biodiversity will help ensure a productive and sustainable fishery

Climate Change

Intermediate interaction

Possible changes in the abundance of commercial stocks. Possibility of increased fishing effort in more sheltered inshore areas as a result of frequent extreme weather events.

The pilot plan should recognise that fishermen require spatial flexibility to be able to respond to the effects of climate change on their stocks.

The pilot plan should identify appropriate mitigation measures for responding to increased fishing pressure in inshore waters, both for the fishery itself and other sectors.

Cultural Heritage and Historic Environment:

Minor interaction to no interaction.

Fisheries are an important part of Orkney's cultural heritage and the pilot plan should bring awareness to this fact. Links to positive cultural identity enhance 'well-being'.

Water and Marine environment

As with biodiversity and natural heritage.

Marine Renewables:

Major interaction

Potential impacts on fish and shellfish ecology (from habitat removal, noise, EMF and potential risks of collision).

Potential for displacement of fishing effort to other areas with knock-on implications for sustainability of stocks.

Restriction of movement for fishing vessels due to implementation of exclusion zones.

Recommend the plan ensures development is steered away from fishing grounds, especially spawning and nursery grounds and any habitat e.g. maerl, that supports immature commercial stocks.

Aquaculture

Major interaction

Organic enrichment (from waste feed, faecal matter, chemical pollutants) causing anoxia, algal blooms, changes in sediment quality and benthic species composition. Effects can spread to as far as 1.2km from salmon cages (Milewski,2001) depending on intensity and direction of currents.

Effects on local fishery potentially profound, especially if salmon farms are located close to important spawning grounds and habitat (eg maerl beds) for commercially important species such as king scallop (*Pecten Maximus*).

Displacement of divers and creelers from prime fishing grounds is a serious concern with regard to aquaculture developments.

The pilot plan should address this conflict by conferring a priority to fisheries when a negative interaction between the two sectors is likely to occur.

Recreation and tourism

Minor to intermediate interaction.

When large cruise ships come into Kirkwall, entry to the inner harbour is restricted for fishing boats. Tender vessels from cruise ships can displace boats from their normal berths and have in the past caused damage to vessels undergoing repairs beached on the hard standing due to wash from tenders entering and exiting the harbour basin at speed.

There is potential for conflict between the legitimate needs of a working harbour for large vehicle access and storage of fishing gear and the aesthetic aspirations of the tourism.

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?](#)

Uncertain as we believe a ranking strategy on existing users should be defined ordered by historical access and use underpinned by the fundamentals of human need which is food. Any fixed or inflexible strategy for the sea could work against the dynamic interests of fishing which require maximum flexibility.

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:

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 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?](#)

Comments

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:

19: Commercial Fisheries

Section 12.30 suggests that the value of landings into Wick and Orkney in 2012 were £18 billion. We are unsure where this figure came from. The Scottish Government's landing statistics for 2011 put landings for Orkney at **£7,580,000** and Scrabster (Wick is not within the plan area anyway) at **£32,281,000**.

Value of landings and employment figures should also have been provided in Section 12.31 to highlight the fishing industry's economic importance. Furthermore, mention should also have been made of the Orkney Fishermen's Society and its role in adding value to fishery products.

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

We welcome the proposed approach towards presumption against development in spawning and nursery grounds. This would be required for the plan to be consistent with an ecosystem approach.

Would you suggest an alternative approach?

We recommend fisheries policies similar to those expressed in the Shetland Marine Spatial Plan:

Safeguarding Fishing Opportunities

All relevant organisations and stakeholders to work with the local fishing community to safeguard future sustainability of the industry and their stocks.

Development proposals will not normally be permitted if they obstruct an important

fishing ground. An important fishing ground will be defined by the frequency of use, productivity or community dependence of an area, which has been determined by local fishermen.

Local management of Sustainable Fisheries

Fishermen designed local fisheries management will develop appropriate measures so that fishing is not carried out in ways that damage important habitats and species.

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?](#)

Comments

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?

Comments