

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

## Consultation Response: Orkney Sea Kayaking Association

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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?

We would like to see Proposed Policy 21 split into two separate policies, Tourism as one and Recreation as another. We believe this would better safeguard the needs of recreational marine users. Existing policy which could guide a Recreation Policy includes the Scottish Planning Policy Open Spaces & Physical Activity paragraphs 149 & 150 as referred to in p.16 of the Planning Issues and options Consultation Paper.

p.117 Annex 3. Bathing Water Directive 2006 should be amended to say : *'Bathing water quality is a key consideration, particularly in key surfing, windsurfing and paddlesport areas in the pilot PFOW MSP 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?

The forthcoming study on Tourism and Recreation is welcomed which we hope will address the identified knowledge gaps regarding recreational marine use in the PFOW, and look forward to being involved in the consultation as part of this.

It needs to be noted the the quality of life benefits through recreation, particularly in remote coastal and rural areas such as Orkney, Caithness and Sutherland, cannot easily be measured and certainly we believe is not quantifiable in the same manner or correlates to economic measures already used.

#### 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?

No comments to add.

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?

Recreation should be identified as a stand-alone sector in the marine environment.

Links between Recreation and Tourism are acknowledged, however we believe the needs of the two user groups are substantially different and therefore should be considered in the plan as independent sectors. We also highlight that there exist several user groups within Recreation, many of whom share the same needs but several of whom have substantially differing needs, e.g. paddlesport and sailing.

We agree with the identified purposes of the MSP.

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)

Yes the PFOW MSP boundary should be realigned with the boundaries of the proposed 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).

The overlap of Marine and terrestrial planning can lead to grey areas of responsibility between the two regimes this issue must be fully addressed in order to facilitate and support the mapping of both terrestrial and marine planning systems. The roles of Marine Scotland and the Local Authority need to be clear.

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?

Principle 1: Agree.

Principle 2: Agree.

Principle 3: Further consideration of whether coastal land use allocation should be mapped in the marine spatial plan is required.

Principle 4: Agree.

## **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?

We welcome the guiding principles and themes and are pleased to see that close engagement with local organisations and communities will be encouraged.

7.8 appears to imply that certain areas would be reserved for certain activities. This should not be the case. All development in the marine environment should be considered on its own merits irrespective of the type of development that is proposed. This leads to a more thorough consultation process at the application stage, rather than some sectors appearing to be frozen out. Designating areas gives the appearance that a particular sector already has a foot in the door.

## **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?

We hope the PFOW area will, as a result of a well-formulated marine spatial plan, succeed in being a vibrant and prosperous community with through sustainable development and protection of natural, cultural and historic assets be enjoyed by all recreational users.

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.

A suitable balance must be achieved between multiple demands on the marine environment and hope that all existing and future marine activities can be accommodated.

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

We would like protection of and accessibility to the natural environment to be upheld in the marine spatial plan. Paddlesport is a fantastic way for people to experience the diversity and beauty of the environment.

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?

We would like protection of and accessibility to historic and cultural sites to be upheld in the marine spatial plan. Paddlesport is a great way to visit and explore a wide variety of cultural and historic sites, including more remote attractions such as lighthouses, brochs, Martello towers and wartime sites.

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?

We would like promotion and support of economic growth to be upheld in the marine spatial plan. As a paddlesport group with awareness of increasing interest in paddlesport tourism in Orkney, we can potentially foresee the formation of professional paddlesport guiding companies in the area.

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?

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?

Query regarding “minor interactions” between other sectors and Recreation and Tourism. Often it appears that no impact has been given. However there will always be an impact no matter how minor, so surely ‘minor impact’ should have been recorded as a minimum?

## 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?

## 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:

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

Would you suggest an alternative approach?

**Proposed Policy Options - Response Box 2**

Please indicate which proposed policy you are commenting on:

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

Would you suggest an alternative approach?

**Proposed Policy Options - Response Box 3**

Please indicate which proposed policy you are commenting on:

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

Would you suggest an alternative approach?

**Proposed Policy Options - Response Box 4**

Please indicate which proposed policy you are commenting on:

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

Would you suggest an alternative approach?

**Proposed Policy Options - Response Box 5**

Please indicate which proposed policy you are commenting on:

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

Would you suggest an alternative approach?

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?

No Comment

## 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:

Proposed Policy 21.

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

We believe that Tourism and Recreation should have separate policies. (See comment in Q.1 and Q.4).

Would you suggest an alternative approach?

### Proposed Policy Options - Response Box 7

Please indicate which proposed policy you are commenting on:

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

Would you suggest an alternative approach?

**Proposed Policy Options - Response Box 8**

Please indicate which proposed policy you are commenting on:

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

Would you suggest an alternative approach?

**Proposed Policy Options - Response Box 9**

Please indicate which proposed policy you are commenting on:

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

Would you suggest an alternative approach?

**Proposed Policy Options - Response Box 10**

Please indicate which proposed policy you are commenting on:

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

Would you suggest an alternative approach?

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?](#)

**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?](#)