

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

Consultation Response: Orkney Sustainable Fisheries Ltd

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. Further work also needs to be done to attempt to understand the tidal distribution of crustacean and bi-valve mollusc larvae during their free floating stage. This is currently a critical gap in knowledge which places the sustainability of Orkney's fisheries at potential risk from the deployment of marine energy devices.

Orkney Sustainable Fisheries Ltd is currently engaged on a 4 year research project using Succorfish to track fishing patterns and movement of inshore fishery vessels. This is a well resourced project with academic rigor and the outputs should have a bearing on how the PFOW pilot progresses. This type of project should be used to inform the MSP process (both in Pentland Firth and if there is a role out to other areas).

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. It is very difficult to get effective engagement with inshore fishermen due to the nature of their work and their employment "philosophy". Contributions from representative organisations should not be take as a definitive reflection of individual views.

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.

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).

No comment

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.

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' devolved governance over both wild fin-fish and shellfish stocks, and where these devolved management measures directly lead to greater economic returns for inshore fishermen.

Shared and non-conflicting use of marine space across traditional and "new" industry sectors.

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 crab processing in Orkney now employs some 120+ people in FTE 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?

The plan should recognise the importance of devolved fisheries management and the extent to which existing traditional industries are dependent on the entire area (see Section 5 comment above regarding larvae distribution). The plan should consider how the deployment of marine energy devices may impact on inshore fishing, and support the notion of co-operation between different industrial sectors.

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?

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?

No comment

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?

No Comment

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