

# PENTLAND FIRTH AND ORKNEY WATERS MARINE SPATIAL PLAN: ENVIRONMENTAL REPORT

## Consultation Response: Pentland Firth Yacht Club

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### CONSULTATION QUESTIONS

#### Do you have any comments to make about Section 1 of the environmental report?

Q1: A plan should be developed. Whilst not statutory, regulators and consenting authorities must not be allowed to ignore it if not convenient. They must provide reasons and justification for ignoring.

Q2: The PFYC is not unsupportive of development as long as compromises are acceptable. This may require investment in both new developments and new facilities for existing users.

Q3: Agree that any electrical infrastructure development must be carried out with environmental sympathy.

Q4: These are especially difficult waters for small vessels to navigate through. Development must neither unreasonably prevent navigation nor make it additionally hazardous.

Q5: The PFYC is not unsupportive of harbour developments as long as the needs of existing users are taken in to account – including tourism, leisure and sport use.

Q6: As above

Q7: The PFYC does not support aggregate extraction or sea dumping for the purpose of fiscal benefit only. Only where the material is not available elsewhere with lower environmental damage would any extraction be considered.

Q8: Generally the PFYC does not support artificial structures along the coastline. Natural rock armour may be acceptable in some instances but generally natural processes should be allowed to proceed.

Q9: PFYC supports the proper protection of fish and commercial fishing under controlled circumstances. We do not believe that current practices are the best available. We believe fish stocks can be managed to increase and still provide viable commercial fishing

Q10: PFYC believes that unless very tightly regulated aqua-culture is too damaging for the environment and is often poorly located affecting safe navigation and anchorages. If the controls are adequate then we are not unsupportive of controlled commercial aqua-culture. This includes creel fishing – some creel practices are dangerous to safe navigation.

Q11: PFYC is generally supportive of recreation and tourism development as long as this is in an environmental sympathetic form. The rich local wildlife is a consequence of it being less disturbed.

#### Do you have any comments to make about Section 2 of the environmental report?

Whilst the PFYC agrees with the principles of lowering green house gases the methods used to achieve this must not be at any cost. We support environmental sympathetic exploitation of local marine resources but not necessarily full exploitation if environmental and loss of amenity cost is too high. The justification for exploitation needs to be more than just for fiscal benefit.

Generally the PFYC is appreciative of the level of statutory protection provided and the investment in research. We are conscious that some data is qualitative or based on short term studies that could be exploited to benefit of developers or consenting authorities. Local environmental cycles may be spread over more than one decade.

### **Do you have any comments to make about Section 3 of the environmental report?**

The PFYC believes the principle of an open and controlled process of assessing development impacts is sound. However whilst various commercial development interactions are considered we are concerned that existing users are largely ignored, especially if not providing significant direct revenue. Some of these non-commercial uses help preserve the amenities, culture and protect the environment from inappropriate exploitation e.g. the older Scrabster harbour had stone harbour walls that supported significant wildlife include eels. This habitat is now fully removed and has not been replaced with an equivalent alternative. Whilst we are not against Scrabster developments, from an environmental aspect these impacts need to be better considered.

Q1: We do not agree with option 1. We agree with option 2

Q2, Q3, Q4: The existing marine environment is as pristine as will be found in any industrial nation. This must be preserved during any development.

Q5: Existing users both commercial and non-commercial must also be taken into account. In many cases existing low intensity use protects against damaging exploitation.

Q6: We all rely on O&G based energy and so PFYC is not against its exploitation as long as environmentally sensitive.

Q7: We are generally against commercial dredging and dumping. We would expect the first level of questioning to be why needed in Pentland Firth / Orkney at all and only if this test is passed should the environmental impact be considered.

Q8: On the whole PFYC is against artificial coastal structures. We have to be wary that developers don't build along the coast and then later argue that they need coastal defences. We may support some natural rock armour protection in some instances.

Q9 & Q10: Exploitation using commercial fisheries and aqua-culture needs stronger controls. With these controls in place we would not be unsupportive.

Q11: Needs to be carefully controlled and regulated to avoid damaging the

very environment that attracts them but otherwise PFYC is supportive.

**Do you have any comments to make about Section 4 of the environmental report?**

The PFYC has some concerns about long term cumulative effects. Whilst we support most forms of sympathetic exploitation we believe there is a limit to when the local environment, both marine and on-shore, can sustain development without irrevocable damage. We also are concerned that such changes may creep in cumulatively as has happened nationwide. That is, as an area is exploited, the fauna and flora is depreciated and after a decade or two residents become used to this lower level. The next stage of development is then working from a new depreciated baseline.

We believe that a clear baseline should be set – this perhaps should be based on environmental conditions already established from some decades ago. Any current and future developments should be based on this original baseline not just what is pertaining at the time. This baseline should only be updated where there are environmental improvements.

**Do you have any comments to make about Section 5 of the environmental report?**

Please refer to comments on section 2 and 4. Monitoring should take account of not just the current / future state but the comparison with a baseline set possibly from some decades ago (if practicable). Also monitoring should take into consideration that local cycles may change year on year and even over many years. A 6 month study will not reveal these long term cycles.

Whilst we agree that mitigation can be used to avoid, minimise or compensate for environmental damage there should be a publically available, or even debated, list of acceptable mitigation means.

Mitigation may require new facilities in addition to those provided by/for developers to ensure the needs of existing users are maintained. The impact of cost of this needs to be included in the assessment.

**Do you have any general comments to make about the environmental report?**

Yes  No

Comments