

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

### Consultation Response: Pentland Canoe Club

On behalf of the Pentland Canoe Club, in Thurso, please find attached our response to the Pentland Firth and Orkney Waters Marine Spatial. Additionally we would like to make the following points

- Recreational activities such as kayaking, surfing etc need to be given their own individual status as a sector and should be consulted
  - The Club would like to be included in the forthcoming Leisure & tourism consultation study which is due to be undertaken later this year.
  - The majority of our activities are undertaken adjacent to the coastline and there needs to be a navigable channel maintained. Obstacles / exclusion zones could force kayaks away from the coastline and into unfavourable / dangerous environmental conditions (tidal streams / offshore winds etc). Rights of passage / navigation also need to be maintained between the coastline and offshore islands.
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## CONSULTATION QUESTIONS

This consultation questionnaire sets out the consultation questions from within the relevant sections of the Planning Issues and Options Paper. Your views are sought on the proposed policies, and where appropriate, alternative policy approaches, as set out in section 11 and section 12 of the paper. Please insert your response to the questions and proposed policy options in the text boxes provided.

WHEN MAKING COMMENTS IN RELATION TO SPECIFIC SECTIONS OF THE PLANNING ISSUES AND OPTIONS PAPER, IT WOULD HELP IF YOU COULD QUOTE THE RELEVANT PARAGRAPH NUMBER(S), IF APPROPRIATE, SO WE CAN CLEARLY UNDERSTAND YOUR COMMENTS.

### 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?*

Comments

### 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?*

Comments

### 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?*

Comments

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?*

Comments

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)*

Comments There maybe benefit to realign the existing PFOW Marine Spatial Plan to the boundaries of the proposed Scottish Marine Regions. However if this was done, there would need to be a close working basis for the Pentland Firth Area (the area of water between Dunnet Head and Duncansby Head) to ensure that same plans / polices/etc were being adopted.

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).

Comments

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?

Comments

Under Principle 2 (or other appropriate principle) reference should be made to coastal visitor attractions (eg view points) or other points of interest.

### **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?

Comments

### **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?

Comments

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.

Comments Scotland has been promoting venture tourism. The area offer great potential for water based adventure tourism in particular surfing (board and kayak). Over these activities are increasing across Scotland.

Sea kayaking: Scotland has a reputation as a world class destination for sea kayaking. The Pentland Firth and Orkney waters are some of the most challenging in the UK. Guide books have been written (Scottish Sea Kayaking – Fifty Great Sea Kayaking Voyages; the Northern Isles – Orkney & Shetland Sea Kayaking) and new ones to be published highlight trips to be undertaken by visitors to the area. The some of the areas of the Pentland Firth are very challenging and offer challenges to sea kayakers in the same way as mountaineering on some of the world's most challenging mountains.

Surfing: The areas around Caithness offer some of the best surfing breaks in the world. Major sporting competitions have taken place in the area including a number of world championships for kayak surfing.

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

Comments

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?

Comments

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?

Comments Economic Activities which should be encouraged to grow in the area are:

- Adventure Tourism: The Spatial plan could assist this aspiration to develop.
- Use of Natural Products
- Operational & Maintenance Support based out of key ports and harbours (Scrabster, Gills in Caithness)

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?

Comments

Cultural Heritage & Historic Environment: Caithness Archaeological Trust should be a consultee.

Tourism and Recreation: The area offers some of the UK best (and challenging) sea kayaking in the area. The area should be recognised as offering a destination for adventure tourism (water based) – surfing (board & kayak); sea kayaking; diving; sailing (see [www.sailnorth.com](http://www.sailnorth.com)) etc.

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?

Comments

The interaction between recreation/tourism and marine renewables should be a major interaction. During the installation and operation & maintenance phases

there will be significantly increased shipping activity in the area. A full deployment there could be on average 1 device per day being removed from the water for planned maintenance. The activity for unplanned maintenance is unknown. This will increase the shipping hazard significantly to recreational water users in particular sail and kayaking). There is also a potential increase in noise pollution (eg during installation) which could impact on 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?

Comments Yes. To ensure a co-ordinated and structured approach looking at the whole area not just a single development.

## 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 Tourism & Recreation

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

Comments Please ensure that recreation guide books (eg guide books for sea kayaking and surfing) are consulted so that there is an understanding of the established / recognised routes or surfing areas. There are currently 2 guide books for sea kayaking in the area and a 3rd is about to be published. It is important to contact local organisations (eg clubs) who will have more detailed information of areas used.

The preferred option should consider where marine development consent could bring benefits to tourism and recreation.

Would you suggest an alternative approach?

Comments

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

Please indicate which proposed policy you are commenting on:

Comments Protected Species

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

Comments The preferred option should provide an overview of potentially sensitive known locations of individual species and also guidance of where further information can be obtained.

Would you suggest an alternative approach?

Comments

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

Please indicate which proposed policy you are commenting on:

Comments Landscape & Seascape

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



Comments It is important that the visual impacts of developments are considered and in particular the cumulative impacts. The impacts should also the visual and noise impacts during installation and operation & maintenance.

Would you suggest an alternative approach?

Comments

**Proposed Policy Options - Response Box 4**

Please indicate which proposed policy you are commenting on:

Comments Waste management and Marine Litter

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

Comments The policy should also safe guard the water from increase pollution from "rubbish" discarded /lost from vessels as a result of increase activity.

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:

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 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

