ORKNEY HARBOURS MASTERPLAN PHASE 1 CONSULTATION REPORT

FEBRUARY 2020

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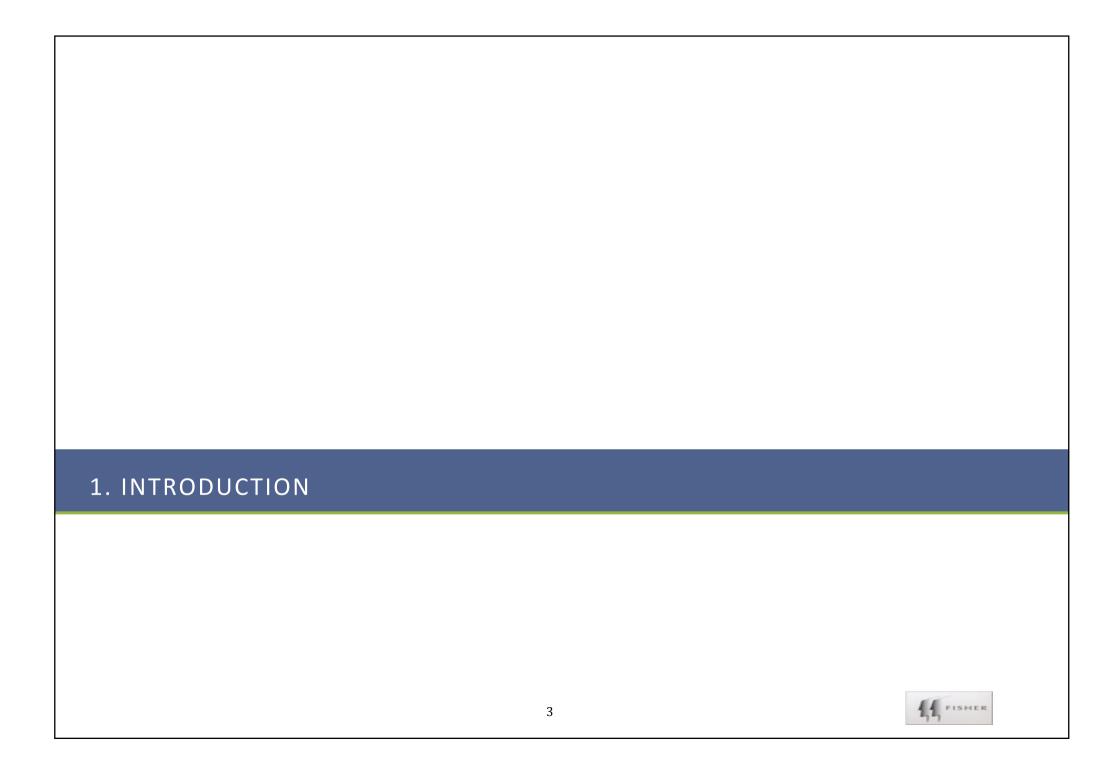
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Importance of stakeholder engagement

Stakeholder engagement and participation has played a key role in the development of the Orkney Harbours Masterplan Phase 1.

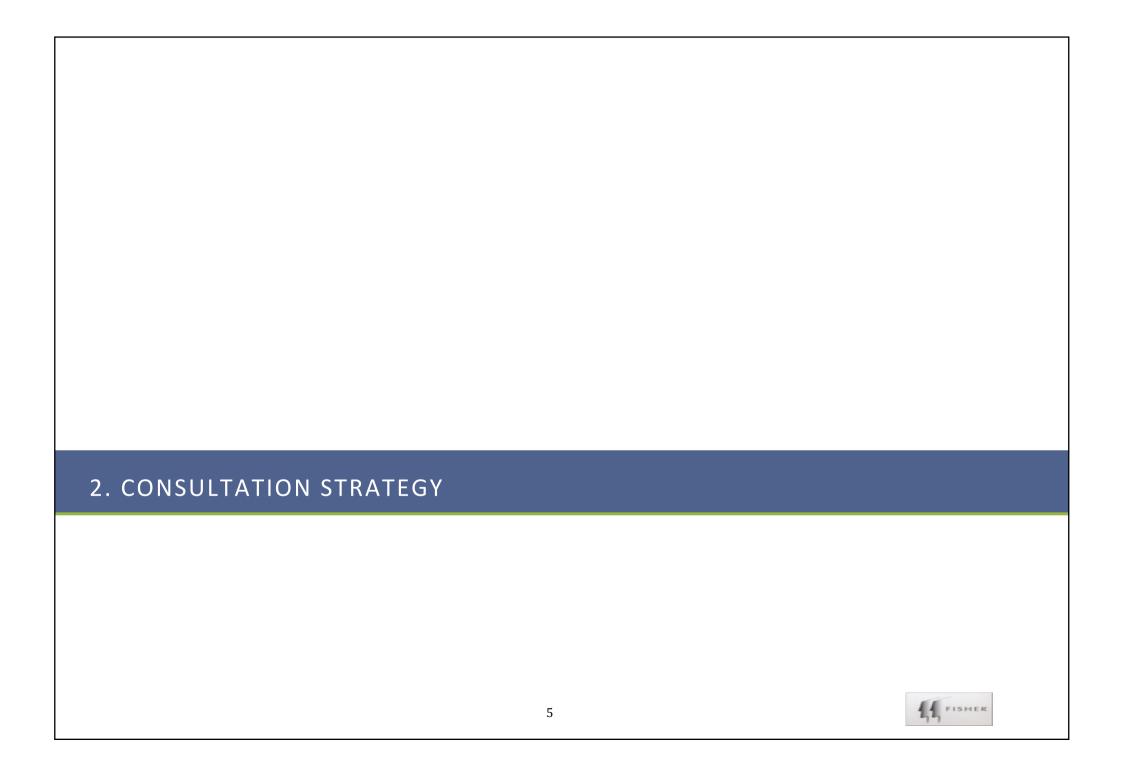
The views and comments of stakeholders have and will continue to inform core elements during the process of developing and finalising the masterplan:

- Real understanding of the issues, constraints and threats facing Orkney's harbours, their users and the wider community.
- Potential opportunities for Orkney Harbours in the future, which in turn informed the development of initial proposals for consideration.
- Setting of objectives, outline requirements and the appraisal framework.
- Finalisation of the masterplan.
- Future development of the proposals through feasibility and implementation.

Structure of this report

This Report provides an overview of the stakeholder engagement and participation activities carried out during the development of the masterplan. It covers the following:

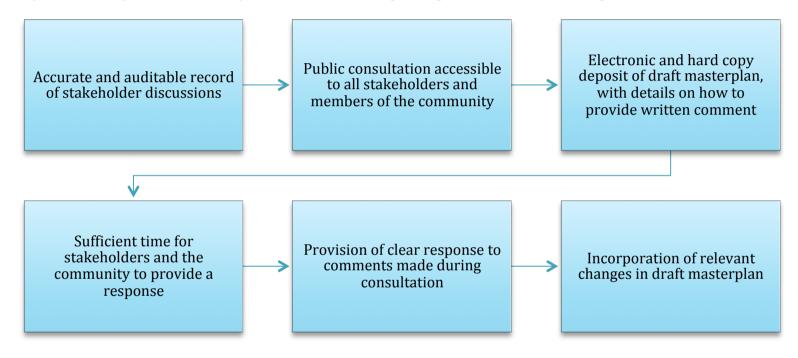
- Consultation strategy.
- Stakeholder engagement summary.
- Addressing community consultation comments.

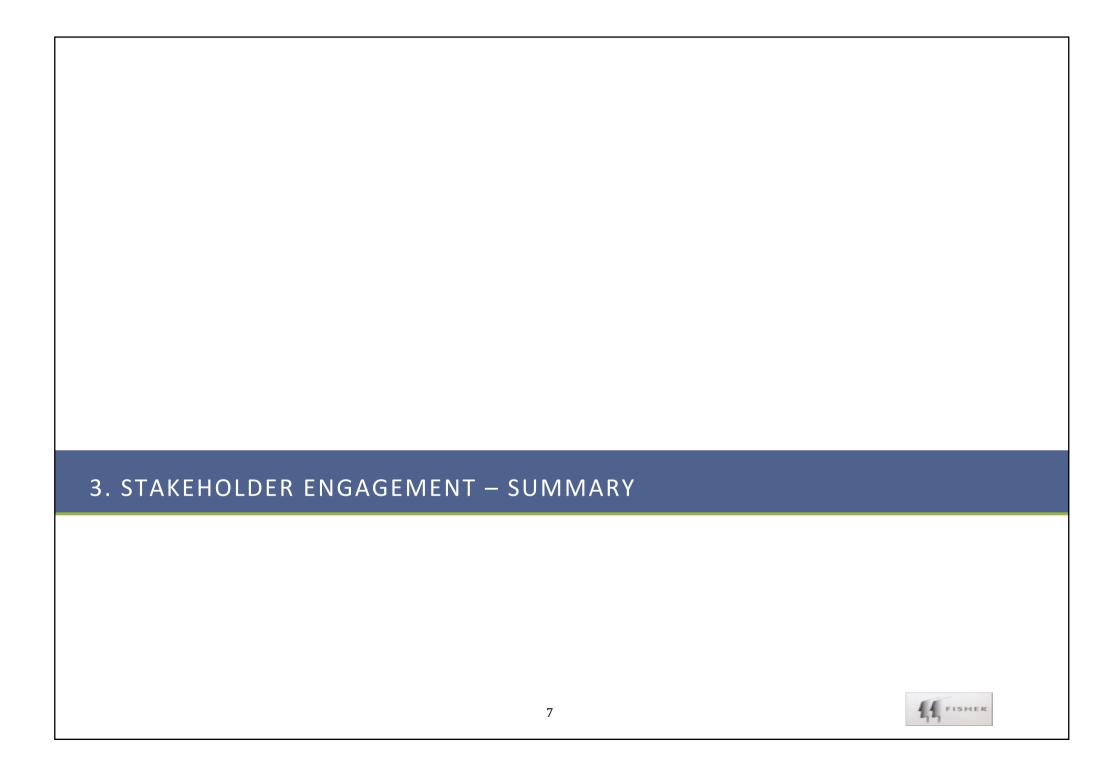


Consultation strategy

At the start of the project a detailed plan for stakeholder engagement activities was defined and agreed – see below.

A key aim of Orkney Harbour Authority was to have the masterplan aligned with the Local Development Plan.





Introduction

This section provides an overview of stakeholder engagement activities undertaken throughout the development of the masterplan.

Opposite a summary of stakeholder activities is presented, followed by more detailed summaries overleaf.

In addition to consultation with external stakeholders several brainstorming sessions were held with internal stakeholders, namely Orkney Harbours and Orkney Island Council (OIC) officials.

Consultation activities

One-to-one stakeholder discussions

- Face-to-face and telephone discussions with key stakeholders, primarily harbour users, to obtain views on issues, constraints and opportunities.
- •Ongoing dialogue with officials from OIC, other public sector organisations and industry bodies.

Harbour user workshops

•Discussion and verification of issues and constraints, as well as consideration of potential opportunities for Orkney Harbours, from the harbour user perspective.

Community Consultation

- •Public meetings to present the draft masterplan and drop-in sessions to enable members of the public to view the draft masterplan and accompanying Strategic Environmental Assessment (SEA) Report, ask questions and make comment.
- •Draft masterplan and SEA Report were also available online and in hard copy for a period of six weeks.



Overview

Throughout the development of the masterplan many discussions were held with stakeholders across a range of sectors.

At the start of the process a number of face-to-face and telephone discussions were held with stakeholders to inform them of the masterplan process and hear their initial views on issues and constraints.

As the masterplan developed discussions with various departments within OIC and other public sector bodies were undertaken. Two seminars were organised to which numerous Council officials were invited.

Sixty stakeholder discussions were conducted in total.

Stakeholder discussions

Sector	No. discussions
OIC/Orkney Harbours	15
Transport (ferries/haulage)	6
Fishing, aquaculture & seafood processing	8
Tourism	2
Energy (oil & gas/renewables)	8
Engineering/supply chain	5
Marine leisure	6
Education	2
Public sector agencies	8
Total	60



Overview

At an early point in the development of the masterplan three workshops were held, two in Kirkwall and one in Stromness.

The purpose of these workshops was to inform harbour users about the masterplanning process and to illicit their views on issues, constraints and opportunities for Orkney Harbours.

A list of harbour users was developed with input from OIC Marine Services. This list included businesses involved in marine engineering, renewables, provision of ferry services, fishing, aquaculture, logistics, marine leisure, seafood processing, boat building and repair, fuel and transportation, as well as individual boat owners.

Most stakeholders were contacted directly either by email or telephone, and sector associations forwarded the invite to members.

More than 150 stakeholders were invited to attend the workshops. More than 60 stakeholders confirmed that they would attend one of the workshops. On the day a number were not able to attend due to work commitments: in total 41 stakeholders attended. See opposite a summary of attendees by sector.

Workshop agenda and attendees

A presentation provided an overview of the masterplan (see Appendix A), which was followed by two workshop sessions where stakeholders discussed particular topics and fed back to the group:

- Views on issues and constraints.
- Views on ideas and possible proposals to be considered in the masterplan. Stakeholders were provided with harbour plans and asked to physically draw their ideas on these.

Sector	Attendees
Ferries	3
Marine leisure	9
Fishing	7
Renewables	4
Logistics	3
Boat repair	2
Aquaculture	4
Engineering/supply chain	5
RNLI	2
Other	2
Total	41

A summary or worksnop outcomes is presented overlear, categorised by harbour or pier location.



- Kirkwall Pier is well used by a range of businesses and different types of vessel; there can be congestion and competition for berthing space.
- Pier space can be limited with regard to operational activity e.g. when cruise liners are in, boats are on pier for maintenance, etc.
- Water depth could be a constraint in the future.
- Marina is constrained in that it cannot accommodate larger yachts. There is also demand for more commercial marina berths.
- Desire for more landside facilities for visiting boats e.g. shiplift, hardstanding area for maintenance, storage.
- Conflict between operational activity (e.g. forklifts, loading/unloading boats) and tourists/pedestrians.
- Issues around access and facilities for fishermen at Kirkwall Pier need to be addressed.
- Concern of cross-contamination, e.g. with cattle trucks on pier alongside fish products.

Ideas and proposals

- Reclamation of area adjacent to marina. Various uses suggested parking, boat repair area, shops, etc.
- Create new pier infrastructure at the north end of the pier. This could create a new area for berthing the inter-isle ferries, freeing up space in the main area of the harbour.
- Separate ferries from workboats/fishing boats possibly relocate ferries to Hatston.
- · New breakwater.
- Improve roadway around quayside.
- Increase RoRo marshalling area with better traffic management.
- Second linkspan for Orkney Ferries to give more flexibility to ferry timetable.
- Could North Isles cargo operations go to Hatston? E.g. if there was a separate LoLo freight boat.
- Relocate North Isles waiting room.
- Facility for inshore fishing although is this the best place?



- General perception that Hatston is at capacity, with many different users competing for berthing space, operational areas on the quayside and ashore.
- · Lack of space for laydown, freight and trailers.
- Perceived lack of land available for expansion around Hatston.
- Management of traffic could be improved: there is conflict between different users/uses, e.g. pedestrians (tourists/cruise line passengers) mixing with operational areas (e.g. work on piers, trucks, etc.).

Ideas and proposals

- Additional pier infrastructure (several configurations suggested) to create more berthing space and additional quayside area.
- Separate new quay infrastructure for renewables; incorporate slipway, further west. Needs to be able to handle 100 tonnes.
- Reclamation of land on either west or east side of existing pier infrastructure.
- Several suggestions for use of reclaimed land/additional areas salmon processing factory/area for aquaculture, base for interisle ferries, additional space for trailers/logistics/freight, create new area for bus parking on the quayside, move the car marshalling area closer to the terminal.
- Wider access road to pier to improve traffic system particularly for lorries, with a one-way system.
- Additional linkspan so that passenger ship and freight ship can call simultaneously – linkspan could also be used by aquaculture sector.
- Boat maintenance facility.
- Separate road connecting lairage and Orkney Mart.
- Infrastructure for hydrogen storage (which could be coupled with inter-isle ferry terminal).
- Segregate area for logistics/freight handling associated with ferry.
 This will remove conflicts.



- · Congestion and limited space on South Pier.
- Lack of berths in the marina.
- Smaller boats have issues using Copland's Dock, particularly the spacing between fenders and the height of the pier.
- Limited laydown area, storage space and marshalling space.
- Need to consider Stromness and its built environment when planning for the future – waterfront ambience and amenity, smells, noise, etc.

Ideas and proposals

- Consider options to improve berthing and landing for smaller boats at Copland's dock (e.g. removal of fenders, additional fenders, crane).
- Consider whether any piers can be extended to provide more shelter/additional berths.
- More quayside/landside space is required at Copland's Dock.
- Develop industrial base landside at Copland's Dock. This could include storage, warehousing, laydown area.
- Expand marina facility.
- New access road to pier avoiding residential areas.
- Boat repair and maintenance facility adjacent to Copland's Dock, with ship lift and common user workshop facility.
- Install weighbridge at Copland's Dock.
- Improve access to South Pier relocate OFS building to Copland's Dock and possibly other buildings to create better lorry access on to the pier.
- Create bridge between old and 'new' Stromness.
- Wider slip at Point of Ness as it is too narrow.
- Do not jeopardise Northlink ferry services calling at Stromness would result in huge economic loss for Stromness.



Hatston Slip

• Slip could be better maintained, plus creels in water can block navigational channel for rowers and sailors.

Tingwall

- Space is very limited and there is a lot of activity ferries arriving and departing and associated vehicular traffic, fishing boats, aquaculture boats, lorries delivering feed for aquaculture, lorries picking up fish landed.
- Wave climate issues lack of wave protection.
- Pier is very narrow a lorry can't go down the pier and turn, it must reverse down.

Lyness

- Designed for container hub/decommissioning/renewables, which hasn't happened so far.
- Not suitable for small boats/lack of facilities for marine leisure.
- Difficult alongside in certain weathers.

Houton

- Waiting room at Houton is a good example of what can be done it includes interesting local history elements.
- Limited berthing space.

Burwick

- · Linkspan is in wrong place for efficient berthing.
- Marshalling area undeveloped/too small.

Burray

- Lack of water depth/limited capacity for current users.
- Opportunity to encourage marine leisure development.
- Opportunity to open up the boatyard facility.

Westray/Papa Westray

- Limited berthing space at Pierowall.
- Wave climate issues in Papa Westray.

Stronsay

- · Wave climate issues affect berthing.
- Depth around Fish Pier and access channel cited as issue.
- Fish Pier in poor condition.



Ideas and proposals

Hatston Slip

• Develop Hatston Slip as a location for a variety of activities (e.g. boat repair, aquaculture, etc.); create breakwater on north side; new surface/top; reclaim land to the north and south for boat storage; power and water supply.

Tingwall

- New pier with dog leg and additional hardstanding.
- Widen existing quay.
- Breakwater to provide protection.
- Develop land for operational use/reclamation.

Scapa Pier

• Upgrade Scapa Pier, knocking down walls, levelling the quay.

Scapa Flow

- Floating dry dock.
- Floating transhipment container terminal.

Lyness

- Future hub for liquefied natural gas (LNG).
- Create facilities for small boats/marine leisure (e.g. visitor moorings, reinstate slip or develop West Pier).
- Bridge between Stromness, Graemsay and to Hoy + upgrade the road.
- Create new ferry terminal on Hoy for Scotland-Orkney crossings.

Burwick

- Move the linkspan and turn around and so face NW: this will enable boats to access/egress more easily.
- Local dredging to fill in marshalling area.

Burray

• Dredge to give more depth of water; build necessary infrastructure to host a boat lift.

Shapinsay

- · Pier extension and dredging.
- · Additional car parking.

Westray

- Improve berthing; construct breakwater.
- Improved amenities (e.g. toilet and showers).
- · Reduce gradient of slip.

Papa Westray

• Extend marina plus reclamation.

General

- Create new leisure facilities throughout the North and South Isles
 develop strategic plan for pontoons/enhancing piers.
- Single point of contact in Council regarding harbours.



Aims of the community consultation

The main aims of the community consultation were:

- To inform the local community and wider public about the Draft Orkney Harbours Masterplan Phase 1 and accompanying SEA Report.
- To invite the local community to read and make comment on the draft masterplan. The event also provided an opportunity for all stakeholders previously consulted to read and make comment on the draft masterplan.
- To inform the finalisation of the masterplan.

Publication of the draft masterplan

The draft masterplan was made available online and in hard copy between Monday 10^{th} June and Monday 22^{nd} July 2019.

It was published on the Orkney Harbours website inviting stakeholders to read and provide comment, with details on how to submit views directly or to complete a short questionnaire online. Details of the public consultation events were also provided.

A hard copy of the draft masterplan was deposited at the customer desk at OIC offices and at libraries in Stromness and Kirkwall, as well as being made available on the mobile library service.

Two adverts were placed in local media providing details of the community consultation: in The Orcadian on 6th and 13th June 2019.

All stakeholders who had been previously contacted during the development of the masterplan were emailed and informed about the community consultation.

An online and hard copy questionnaire was made available during the consultation period.



Community consultation overview

Community consultation events were held in Stromness and Kirkwall on the 12^{th} and 13^{th} June 2019 respectively.

A presentation of the draft masterplan was given at 1pm and 6pm and drop-in sessions were held between 1.30pm and 4pm and between 6.30pm and 8pm in both locations.

The consultation event in Stromness was held in the John Rae Room at Stromness Library, whilst the event in Kirkwall was held in the Supper Room at Kirkwall Town Hall.

Plans of the draft masterplan along with details of how the masterplan was developed were displayed on information boards.

Copies of the masterplan were available for people to take away, along with a short questionnaire seeking their views on the prioritisation of proposals within the masterplan.

Members of the masterplan team and Orkney Harbours staff were available during events for 1-2-1 discussions.

A total of 65 people attended one of the events – see opposite.

Comments received at the community consultation events are presented overleaf.

Attendees

Events	Attendees
Stromness Presentation 1pm	17
Stromness Drop-in 1pm – 4pm	3
Stromness Presentation 6pm	5
Stromness Drop-in 6.30pm – 8pm	1
Kirkwall Presentation 1pm	30
Kirkwall Drop-in 1pm – 4pm	3
Kirkwall Presentation 6pm	5
Kirkwall Drop-in 6.30pm – 8pm	1
Total	65



Comments arising during community consultation events Topic

Topic	Comments/views
Kirkwall	How much dredging will be required to reach a depth of 6.5m at Kirkwall?
	Will the new infrastructure at Kirkwall enable large cruise liners to come alongside here?
	Seating around the waterfront development area is needed.
	In the future the RNLI would like to see their vessel moved from its current location potentially into the East Basin. At present there can be issues getting the lifeboat in and out when there are cruise tenders coming in.
Hatston	With additional vessel calls expected are there proposals to deal with additional waste disposal requirements?
	Are there any proposals to provide shore power to vessels?
	Is the provision of hydrogen going to be considered – e.g. if the Northlink Ferries start using hydrogen?
	Can tourists and industrial activities be separated/segregated? One key concern is lorries reversing whilst cruise passengers are exiting the terminal.
	Will fuel bunkering opportunities be explored at Hatston?
	Where will aggregates come from to construct Hatston and how will it impact on the road network?
	What will the boatyard facility look like?
Scapa Pier	Additional land at Scapa Pier would benefit Kayak Club as there are current issues with car parking/access.
Lyness	Is it not possible to extend the quay at Lyness and dredge, rather than create a new deep water quay?
	Lyness was highlighted as a key port for decommissioning – have these plans disappeared? Has a study been done to understand why certain industries have not come to Lyness?
Flotta	Question about to why Flotta is not mentioned in the masterplan. Would LNG be brought in by tanker and then put in storage tanks at Flotta?



Comments arising during community consultation events **Comments/views Topic** How are you going to deal with sea-level rises particularly in Stromness? Could some harbour infrastructure become Stromness unusable? There is no regular pontoon for cruise liner tendering and there are security issues with using the existing marina facilities – is it possible to identify a location for a pontoon which could also be used by other users such as marine/diving tours? Diving boats are having issues with access for disabled customers. There is no inclusion of additional marina pontoons or facilities in the masterplan – funding wasn't obtained for the marina so it would be good if it could be included. Is it possible to have a slipway and boat lift out facility at Copland's Dock or Polestar Pier? All that is required is a track and dolphins. Harbour master does not have a clear view of the harbour area. Could a new harbour master's office be considered in the masterplan? Rather than reclamation at Copland's Dock could the existing land not be cut into to create more shoreside area? Why is marine tourism considered at Scapa Pier and not at Stromness?



Comments arising during community consultation events

Topic	Comments/views
Decarbonisation/ renewable energy	Given the recent announcement of a Climate Emergency how is this being addressed in the masterplan – perhaps there should not be a focus on building infrastructure to support the oil and gas sector?
	The Government now has targets for decarbonisation – there should be a focus on renewables and fuels such as hydrogen in the masterplan.
	Has the harbour authority considered becoming a bunker port: particularly looking at new fuels within a decarbonisation strategy?
	Has provision of future fuelling options and shore power by renewable energy for cruise liners and other vessels been considered?
	Could Orkney consider similar measures to Norway with regard to banning cruise ships that are using less environmentally friendly fuels?
	The masterplan should be cognisant of Orkney's energy plan and Community Low Carbon Plan and embody a 'green port' strategy.
	At Stromness there are heat pumps under the surface – this approach could be used for new infrastructure developments.
Future opportunities	There is no consideration in the masterplan of developing a hub for containers/harnessing potential opportunities from the opening up of northern maritime corridor. There may be alternative infrastructure solutions that could be considered such as floating terminals, bunkering, etc.
Hatston Slip	There can be a lot of activity at Hatston Slip when various marine leisure activities are taking place. Kayak Club sorts its equipment in the Sailing Club. A breakwater here would be ideal and possibly the development of the land next to the slip to create a hub for water sports/marine leisure.
Holm Pier	There are issues at Holm Pier with insufficient depth of water and pressure on berths: small boat owners and aquaculture companies want to use this pier.



Questionnaire

Using the software programme Survey Monkey a questionnaire was developed and made available online and at community consultation events.

Stakeholders were asked to state how strongly they agreed with the masterplan proposals and what level of priority should be attached to each of them:

- How strongly do you agree with the masterplan proposals?
- Which of the proposals would you regard as the highest priority, thinking about the potential impact and benefit to Orkney as a whole?
- In your view, what level of priority should be attached to each of the masterplan proposals?
- Do you have any comments on the Draft Orkney Harbours Masterplan Phase 1?

A total of 37 responses were received. A summary of responses to the survey questions is presented opposite followed by several graphs; comments and views included in completed questionnaires are presented thereafter.

Summary of questionnaire responses

Low levels of disagreement with proposals: given that the questionnaire was widely made available, very few stakeholders disagreed very strongly with proposals, particularly those for Hatston and Kirkwall (only one respondent disagreed very strongly with each proposal).

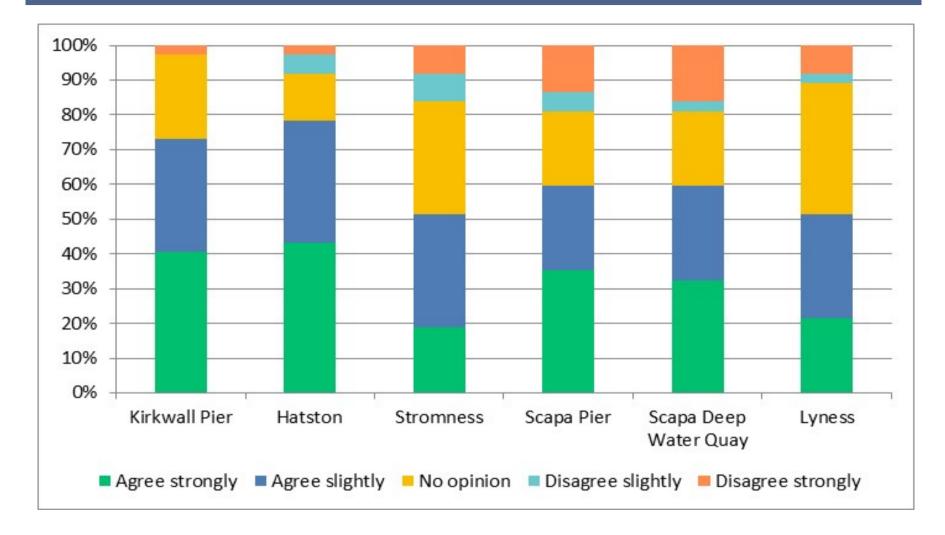
Hatston and Kirkwall proposals most favoured: respondents agreed very strongly with proposals for Hatston (43% and 16 respondents), closely followed by Kirkwall, Scapa Pier and Scapa Deep Water Quay. Considering responses 'strongly agree' and 'slightly agree' together, respondents mostly support Hatston proposals (78% and 29 respondents), again closely followed by Kirkwall (73%), Scapa Pier (60%) and Scapa Deep Water Quay (60%).

Hatston and Scapa Deep Water Quay regarded by stakeholders as highest priority: when asked what proposal should have the highest priority, 22% (8 respondents) felt that proposals for Hatston were of the highest priority, closely followed by Scapa Deep Water Quay (19% and 7 respondents).

When asked to rank proposals in terms of priority, Scapa Deep Water Quay and Hatston were considered as the highest priority by 26% of respondents respectively, closely followed by Kirkwall (23% of respondents).

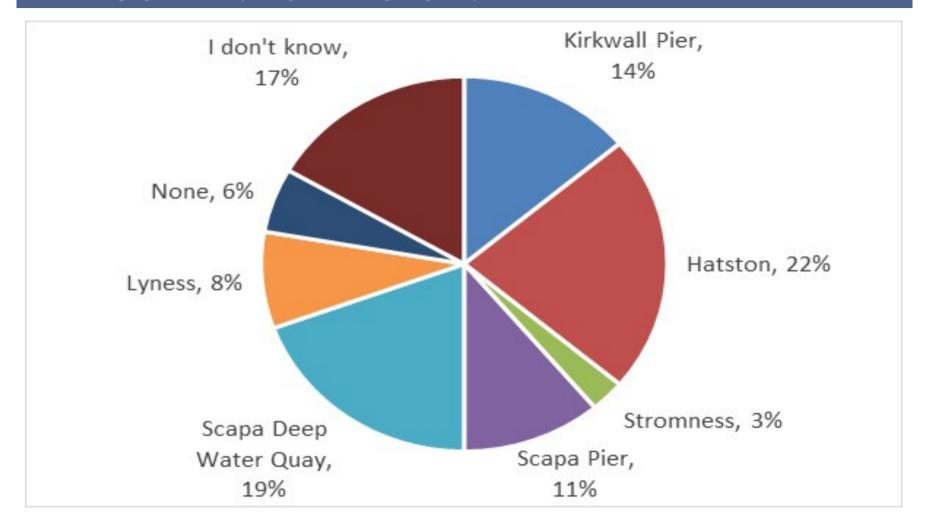


How strongly do you agree with the masterplan proposals?



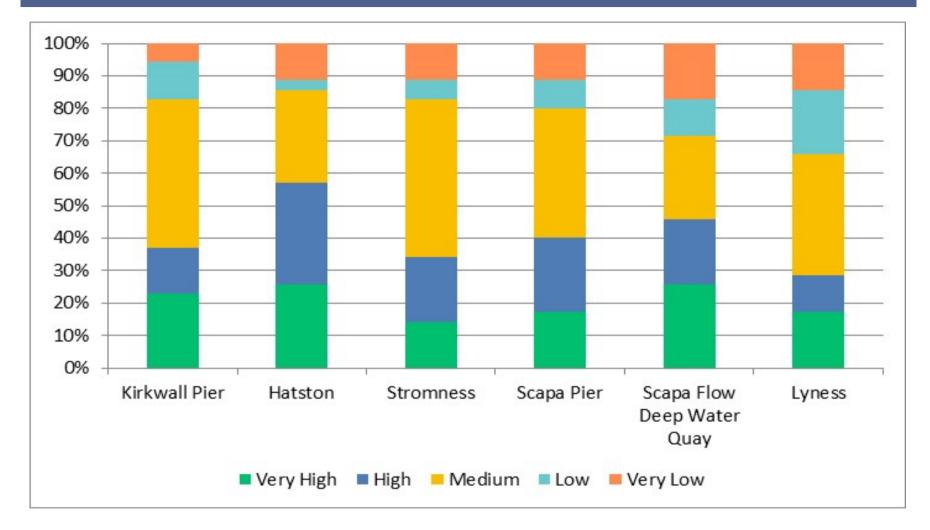


Which of the proposals would you regard as the highest priority?





What level of priority should be attached to each of the masterplan proposals?





Comments and views included in survey questionnaire responses		
Topic	Comments/views	
Renewable energy/ decarbonisation/	Renewables do not feature enough. A new Law is just about to be passed today to be carbon neutral by 2050 nothing in this plan touches on that.	
sustainability/ environmental	Add infrastructure for renewables e.g. shore power, space for hydrogen fuel cell; hydrogen bunkering. Be pioneering.	
impact	All vessels using harbour should have access to shore power and be obliged to turn off diesel engines when connected, this will be an example of best practice globally. The development of a hydrogen economy for marine use is also something to include in the plan. Berthing fees should have a sliding scale based on IMO's GHG rating for carbon efficiency to discourage more polluting vessels.	
	Government and OIC have declared a climate emergency. Notable by its absence and unreasonably deferred is any plan to mitigate the operational hazards of increase in Harbours use let alone reduce them.	
	Each cruise ship is on average producing the equivalent sulphur and nitrogen pollution to 1 million cars, large ones burning 150 tonnes of fuel a day, emitting 450kg of ultra fine particles a day; sulphur is well recognised as a cause of respiratory disease and emissions are a likely carcinogen. Globally shipping is responsible for 3.5-4% of climate change emissions principally carbon dioxide.	
	Increase in marine noise pollution which has a long range, has a destructive effect on the social and hunting behaviour of marine mammals, many of which occur around Orkney and are threatened species. Ballast water discharge which will be commensurate with increased traffic carries the hazard of invasive species. Sewage can be discharged 3 miles offshore which also may be an issue.	
	Orkney Islands Council drivers of financial gain rather than considering the interests of Orkney residents health, wellbeing, and indeed global health and wellbeing. From a practical standpoint it is also dangerous to predicate investment on what is a dying fossil fuel industry which major players are divesting from, such as Norway. There is also importantly a moral issue that we should consider the future of our children. Practically also Orkney is at the forefront of a sustainable energy economy, if it hopes to build on this kudos, attracting business and tourism it needs to be careful of its image and walk the walk as well as talk the talk of clean and green.	



Comments and views included in survey questionnaire responses

Topic	Comments/views
Kirkwall	The Kirkwall Pier development in our opinion would have a wide economic benefit to many businesses, boat owners plus developing the smaller cruise liner. The smaller cruise liners from experience from the early 2000s were more affluent and spent more in our shop in Bridge Street than some in recent years. So we feel this is the priority. I think this would keep Orkney ahead of the curve as a world class cruise destination offering a good gateway for those smaller ships to the harbour front and being more accessible in being able to walk up the street.
	I would suggest that when considering the revamp of Kirkwall pier, that the existing Orkney Ferries office be relocated down to a new building alongside the existing ramp, this may involve removing existing buildings and replacing a number of them with one large building which could house Orkney Ferries/Marine Services/North isles store/passenger waiting area and left luggage facility along the Marina's temporary buildings. This change would modernise and make the Kirkwall pier fit for 21st century use, rather than the chaotic jumble of misplaced buildings which are all sadly outdated and long since outlived their use. I agree with the proposal to build another basin/extend the Kirkwall pier and expand the Marina - I would hope that if this was to be done it would not just be bland concrete! I would like to see flower beds created or street planters along with shrubs to improve the look of the head of the pier (these would need to be planted with appropriate plants suitable for the harsh environment-not just any old random plant) Thinking of Hatston 2 things come to mind; 1. build the new pier closer to Kirkwall to get away from the motion that plagues Hatston! 2. Fit different fendering to the ramp berth so that it could be used as a back-up ramp for the North isles should Kirkwall ever breakdown.
	RNLI may support long term plans to re-locate across to the marina area, where the ALB might be more accessible, a bigger crew room and shop area could be developed should space be made available. Leaving the West Pier area open for innovative/alternative development?
Marinas/ Kirkwall	The marina requires expansion to cope with existing and projected demand, so plans are fully supported. Anchors and chains should be replaced with piles. However swell intrusion will require to be addressed before piles will be successful.



Comments and views included in survey questionnaire responses

Topic	Comments/views
Marinas/ Kirkwall	Phase 1 appears to show a lack of understanding of marine tourism and particularly the investments required to meet the full potential of visiting yachts as the rest of Scotland make major investments. A network of connected marinas is required not an even bigger facility at Kirkwall.
	Expansion of Kirkwall marina: why have an expansion? We have the outer islands of Orkney crying out for tourism and an injection of monies. Stronsay could benefit greatly from an area that yachts could tie up safely, nothing too complicated, something as Westray to start off with. The most important thing it is a relatively sheltered area. Rousay, same as Westray simple but efficient means of a marina. Eday also relatively sheltered. Come on think outside the box, lets get marinas outside the main areas of Kirkwall and Stromness and extend the marina areas in Orkney; it is common sense not to have all eggs in one basket.
Marinas	Inclusion of a slipway for marina users that removes the need to use the ferry slips for launching and retrieving boats.
Marinas/ Stromness	Stromness marina the proposed extension hasn't been included in the plans? There seems to have been an assumption that this was a done deal it wasn't. It is very disappointing that the project has ground to a halt and requires to be resurrected asap.
Stromness - dock extension/addition of platoon.	
	A ship lift and a slipway at Copland's Dock would be beneficial in my opinion.
Boat repair facility	There is no proper lift-out facility north of Inverness; a basic repair lift slipway and hard standing needs to be incorporated (enabling private sector lift out and repair facilities to develop).
Hatston	Hatston - needs replanned as the current arrangement for pickups and bus as well as people walking feels very much unsafe with potential near misses. Very challenging for folk with walking aids and wheelchairs.
Scapa Pier	The investment to extend Scapa pier fails to take account of the need for Orkney to reduce is carbon footprint by reducing oil consumption.
	Scapa is not a place visiting boats would be attracted to.



Topic Comments/views The capabilities proposed for Deepdale could be developed at Lyness providing a much better facility at a very much reduced Scapa Deep Water Quay cost. The Scapa deep water development, this is only suitable for the proposed uses and not for further development where heavy lift may be required, you will have a large lay down area shore side for light structures, wind turbines etc but not suitable for heavy lifts like 1200t tops sides etc for decommissioning. The T piece of the quayside is not robust enough for heavy lifts either and needs to be wider than 30m to allow the topsides etc to be moved on a crawler system to a laydown area. Lyness option is good but to allow deeper draft vessel to use the facility then the jetty front would need to be extended in to deeper water and extended further North to allow for dual usage. Other I would suggest that a number of binding commitments are included in the development plan in addition to those made under the environmental section. These should include a biennial consultation and review of the plan to be amended in the light of new evidence and requirements. I would ask the OIC to make its decisions using health and wellbeing of the population as the primary overriding consideration rather than potential for economic gain. The Isles have been completely left out, its ORKNEY harbours not Kirkwall harbours. Investment in Island without any harbour at all has been overlooked. A big lack of innovation in the plan, really all your doing is making piers bigger and water a bit deeper. It makes no attempt to integrate with land based infrastructure in Orkney. I am unclear whether the community want or need more tourists. Present numbers mean that the visitor experience in Orkney is flawed. Until land based infrastructure for tourism has been enhanced any attempt to increase cruise ship numbers would be irresponsible. Overall the document tells me much in terms of what it will do for Orkney Harbours, in terms of increased revenue etc, but nothing about the wider picture: what will it do for the community who live here. So far my reading is that harbours wish to increase tourist numbers, turn Orkney into an industrial processing yard for the oil industry, and destroy an untouched stretch of the coastline for a new deep water terminal. How does that improve life for local residents?

Comments and views included in survey questionnaire responses



Comments and views included in survey questionnaire responses **Topic** Comments/views *I am somewhat concerned about the expansion of marine aquaculture. Such expansion tends to take up available* Other anchoring spaces used by fishing boats and marine leisure users. Visitors are attracted to Orkney by both the range of anchorages available as well as harbour facilities. Likewise the increase in aquaculture which is unsustainable, contributes to depletion of coastal environments, to pollution with antifoul, antibiotics, and eutrophication of the marine environment. It also has a damaging effect on wild fish populations through escapes, parasites, and now disturbing ecosystems by unregulated wrasse fishing to use in aquaculture. It is recognised that fish farms in Scotland produce more nutrient pollution than the entire human population. Toxic algal blooms killing fish, fish larvae, marine mammals and closing shellfish fisheries are a potential result, and a particular hazard in enclosed bays and harbours such as Scapa. Any proposals that make Orkney an increasingly viable business location can only be good for the community as a whole, I welcome the developments. Clearly thought through and presented logically.



Submissions received during consultation period

A total of 31 submissions were received by post or email during the consultation period from a range of stakeholders – see opposite. This includes responses from the statutory authorities of Scottish Environmental Protection Agency (SEPA), Scottish Natural Heritage (SNH) and Historic Environment Scotland (HES).

The content of these submissions is presented at Appendix C.

The following section presents a summary of key points raised.

Stakeholder submissions

Stakeholder	Responses
Residents	• 8 (anonymised)
Community/ other groups	Burray Community AssociationExtinction RebellionOrkney Historic Boat SocietyRousay Sailing Club
Business/ industry associations	 Destination Orkney Offshore Wind Developer Royal Yachting Association Scottish Sea Farms Sheila Fleet Tritone Marine
Environment agencies/ organisations	EMECOrkney Renewable Energy ForumRSPBScottish Water
National agencies/local authority	Marine ScotlandOIC
Community Councils	Sanday Community CouncilOrphir Community CouncilEday Community CouncilHolm Community Council
Statutory Authorities	HESSEPASNH



Climate change and decarbonisation

A considerable number of comments were made regarding climate change, decarbonisation and environmental aspects. In summary comments embodied the following points:

- The plan should embrace the recent Climate Emergency announcement and targets for decarbonisation, with consideration of appropriate measures within the masterplan.
- There should be a focus on renewables in particular on the provision of fuel, power and other services internally and externally to the marine sector.
- Should Orkney be investing in infrastructure to support oil and gas when there are clear targets for decarbonisation.
- Is there an opportunity to impose environmental restrictions on cruise liners visiting Orkney.
- Aspects such as rising sea levels should be taken into consideration.

Environmental aspects

SNH, SEPA and HES provided comment on the Strategic Environment Assessment (SEA) Report and on the masterplan. Comments on the masterplan are incorporated into this report, whilst comments on the SEA will be addressed as part of a Post Adoption Statement. Comments on the masterplan were also received from Marine Scotland, RSPB and Scottish Water.

These responses were mainly focussed on highlighting requirements with regard to assessing the environmental impacts and identifying suitable mitigation measures, as and when proposals move forward to feasibility stage.

There was also a focus on early engagement once the masterplan has been approved for implementation.



Marinas and marine leisure

A range of comments were made with regard to marinas and marine leisure:

- Generally positive views on proposed expansion of Kirkwall Marina though some stakeholders felt that investment in berths and pontoons around Orkney would also benefit the sector (at locations throughout the Mainland and across the isles).
- The masterplan should include proposals for marina expansion and a pontoon for cruise tenders in Stromness.
- Need for appropriate repair and maintenance facilities/slip/ lift out/wintering/storage.

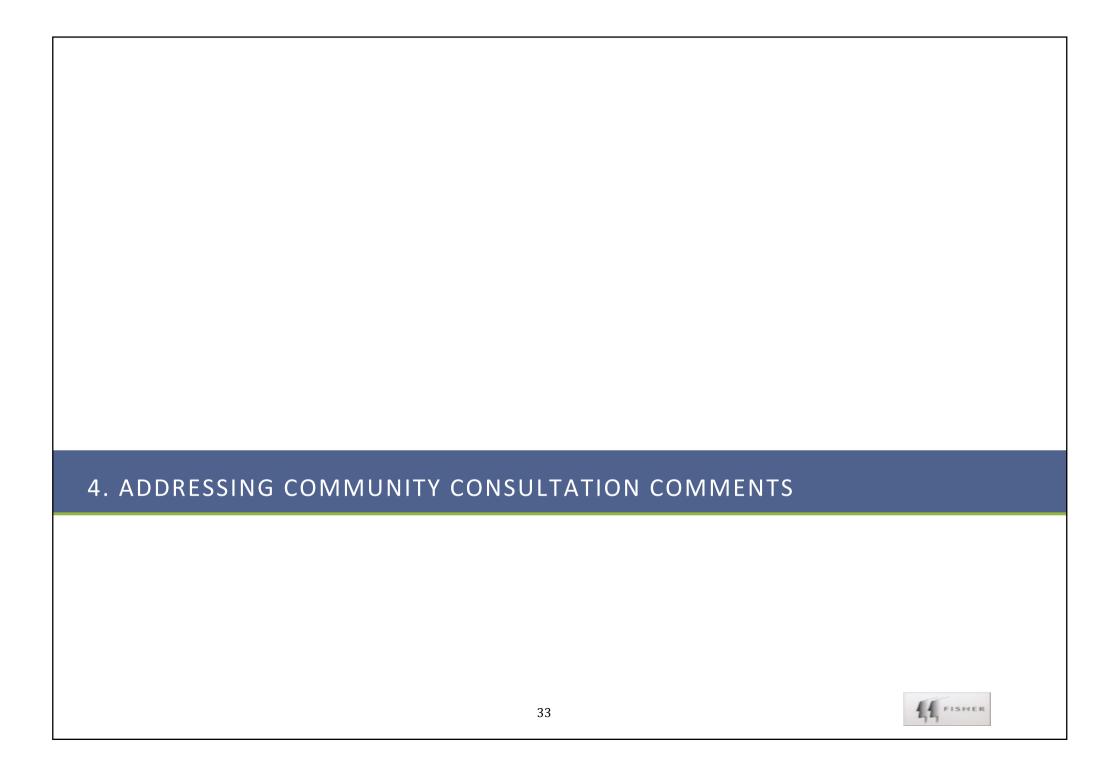
Specific comments about infrastructure

Whilst there are many more comments within the consultation submissions, some key points raised are as follows:

- The exclusion of Lyness as a potential deep water location.
- General requirement to assess and understand impacts of proposals fully (e.g. on environment, traffic, communities and adjacent industries).
- North Isles infrastructure should be included within the masterplan.
- Need to consider land based infrastructure as well as marine infrastructure, particularly if there will be more cruise passengers.
- Need to safeguard land at Hatston for future renewables activity.
- Need to consider infrastructure proposals in the context of the emerging decarbonisation agenda.
- Mixed views on the need for marine leisure berths at Scapa Pier.

Appendix C presents all submission comments and views





Introduction

An important aspect of any plan or project that is subject to a community consultation is ensuring that comments and views are understood and acted upon where relevant.

This section sets out:

- Responses to comments made during the community consultation events.
- Responses to submissions received during the consultation period, including those from Statutory Authorities.

The tables overleaf present responses to comments and views made by stakeholders who attended the community consultation events.

This is followed by a summary of responses to key comments and views expressed in the submissions received during the community consultation period. Detailed responses to all submission comments are presented in Appendix C.

Where the masterplan has been updated in response to a comment, the relevant update is referenced.

Responses to consultation event comments/views

Comments/views	Response	
How much dredging will be required to reach a depth of 6.5m at Kirkwall?	280,000m3/£6.55m of dredging is required to create -6.5m Chart Datum (CD) at Kirkwall Pier.	
Will the new infrastructure at Kirkwall enable large cruise liners to come alongside here?	No, only smaller cruise liners will be able to come alongside at Kirkwall.	
Seating around the waterfront development area (Kirkwall).	Seating has already been suggested as a possible development within the Waterfront Development Area.	
In the future the RNLI would like to see their vessel moved from its current location potentially into the East Basin. There can be issues getting the lifeboat in and out when there are cruise tenders coming in (Kirkwall).	Noted. This is entirely possible and has been referenced in the masterplan. See Page 36.	
With additional vessel calls expected (at Hatston) are there proposals to deal with additional waste disposal requirements?	Waste disposal requirements are considered at the feasibility stage for each proposal, as part of the Environmental Impact Assessment.	
Are there any proposals to provide shore power to vessels (Hatston)?	The masterplan has been updated to reflect the recent Climate Emergency	
Is the provision of hydrogen going to be considered – e.g. if the Northlink Ferries start using hydrogen (Hatston)?	declaration and revised carbon reduction targets for Scotland, along wi a more detailed description of measures to support this policy. See Page 11 – 17.	
Can tourists and industrial activities be separated/segregated? One key concern is lorries reversing whilst cruise passengers are existing the terminal (Hatston).	Segregation will be much easier to achieve with the additional reclaimed land to the east of the cruise terminal at Hatston.	



Responses to consultation event comments/views

Comments/views	Response	
Will fuel bunkering opportunities be explored at Hatston?	Yes; an ex-pipe fuelling system and storage area is considered in the proposal; this will be revisited at feasibility stage with a view to better understanding the market for fuels now and in the future.	
Where will aggregates come from to construct Hatston and how will it impact on the road network?	This is not yet known and will be explored during feasibility stage. Construction impacts will be considered as part of the detailed Environmental Impact Assessment at this time.	
What will the boatyard facility (at Hatston) look like?	The nature of the proposed boat repair facility at Hatston is not yet defined – this will be defined in greater detail at feasibility stage, following a more in-depth analysis of market potential and identification of interested parties that might operate it.	
Additional land at Scapa Pier would benefit Kayak Club as there are current issues with car parking/access.	Noted.	
Is it not possible to extend the quay at Lyness and dredge, rather than create a new deep water quay?	Lyness has been considered in the past as a potential location for decommissioning, though this never materialised. There are a num of factors which may have influenced the lack of activity at Lyness date and why no further major enhancements are proposed for Ly at this time. See Page 53.	
Lyness was highlighted as a key port for decommissioning – have these plans disappeared? Has a study been done to understand why certain industries have not come to Lyness?		
Question about to why Flotta is not mentioned in the masterplan. Would LNG be brought in by tanker and then put in storage tanks at Flotta?	Flotta was originally not mentioned given its pier infrastructure is not in OIC ownership. The masterplan has since been updated to include reference to Flotta and to reflect the recent Climate Emergency declaration and revised carbon reduction targets for Scotland. See Pages 11 – 17.	
There is no inclusion of additional marina pontoons or facilities in the masterplan – funding wasn't obtained for the marina so it would be good if it could be included.	Expansion of Stromness Marina has been included in the masterplan. See Page 46.	



Responses to consultation event comments/views

Comments/views	Response
There is no regular pontoon for cruise liner tendering and there are security issues with using the existing marina facilities – is it possible to identify a location for a pontoon which could also be used by other users such as marine/diving tours. Diving boats are having issues with access for disabled customers.	A pontoon for cruise liner tendering has been incorporated into the masterplan. See Page 47.
How are you going to deal with sea-level rises particularly in Stromness. Could some harbour infrastructure become unusable?	The masterplan has been updated to reflect the recent Climate Emergency declaration and revised carbon reduction targets for Scotland, along with a more detailed description of measures to support this policy. See Pages 11 – 17.
Is it possible to have a slipway and boat lift out facility at Copland's Dock or Polestar Pier? All that is required is a track and dolphins.	Stakeholders have expressed the desire for additional boat repair/maintenance facilities in Orkney. At present a site is identified at Hatston, though the nature of this facility has not been defined in detail – it could serve the marine leisure market or it could be more focussed on fishing boats, or larger, commercial vessels – any such facility would need to attract a private sector operator.
Harbour master does not have a clear view of the harbour area. Could a new harbour master's office be considered in the masterplan?	There could be an opportunity to relocate the harbour master's office to South Pier, depending on future requirements and developments at this location.
Rather than reclamation at Copland's Dock could the existing land not be cut into to create more shoreside area?	Initial cost estimates indicate that this would be significantly more expensive, given that the area of new land needs to be adjacent to the water. However, it could be considered further at feasibility stage. The masterplan has been updated accordingly. See Page 46.
Why is marine tourism considered at Scapa Pier and not at Stromness?	The cruise liner pontoon proposed for Stromness could also act as a suitable access for marine tour boats. The masterplan has been updated. See Page 47.



Responses to consultation event comments/views

Comments/views	Response
Given the recent announcement of a Climate Emergency how is this being addressed in the masterplan – perhaps there should not be a focus on building infrastructure to support the oil and gas sector?	The various comments regarding climate change and decarbonisation have been taken on board, with the masterplan updated in several ways:
The Government now has targets for decarbonisation – there should be a focus on renewables and fuels such as hydrogen in the masterplan.	Consideration of the climate change agenda and emerging policies on decarbonisation.
Has the harbour authority considered becoming a bunker port - particularly looking at new fuels within a decarbonisation strategy?	• Identification of measures that can be implemented with this policy in mind, which can be incorporated into the
Has provision of future fuelling options and shore power by renewable energy for cruise liners and other vessels been considered?	development of all proposals. See Pages 11 – 17.
Could Orkney consider similar measures to Norway with regard to banning cruise ships that are using less environmentally friendly fuels?	
The masterplan should be cognisant of Orkney's energy plan and Community Low Carbon Plan and embody a 'green port' strategy.	
At Stromness there are heat pumps under the surface – this approach could be used for new infrastructure developments.	



Responses to consultation event comments/views

Comments/views	Response
There is no consideration in the masterplan of developing a hub for containers/harnessing potential opportunities from the opening up of northern maritime corridor. There may be alternative infrastructure solutions that could be considered such as floating terminals, bunkering, etc.	The masterplan has been updated to reflect the recent Climate Emergency declaration and revised carbon reduction targets for Scotland, along with a more detailed description of measures to support this policy. Within this section there is reference to the fact that there could be future opportunities arising from the opening up of the northern maritime corridor. See Pages 11 – 17. The engineer assessment concluded that a floating facility is not a suitable alternative. For offshore wind and other activities laydown area of at least 5 hectares is required, with straightforward access to and from the quayside. We will discuss your comments further with our engineers and should any alternative options deliver the same benefits and outcomes as the proposals currently within the masterplan they will be given consideration during
There can be a lot of activity at Hatston Slip when various marine	feasibility stage. There could be some opportunity for the development of marine leisure
leisure activities are taking place. Kayak Club sorts its equipment in the Sailing Club. A breakwater here would be ideal and possibly the	facilities at Kirkwall Pier as part of the Waterfront Development Area.
development of the land next to the slip to create a hub for water sports/marine leisure.	There could be an opportunity to develop the area adjacent to the existing Sailing Club facility; this is however outwith the remit of Orkney Harbour Authority.
There are issues at Holm Pier with insufficient depth of water and pressure on berths: small boat owners and aquaculture companies want to use this pier.	Masterplan Phase 2 will commence in 2020: Holm Pier will be considered within this phase.



Summary of key responses to submissions during consultation period

This section provides a summary of key responses to submissions received throughout the consultation period: see Appendix C for detailed responses to each comment/view.

Climate change, decarbonisation and environmental aspects are not adequately addressed in the masterplan

The masterplan has been updated to reflect the recent Climate Emergency declaration and revised carbon reduction targets for Scotland. A further explanation around particular infrastructure investments is also presented, as well as highlighting potential measures. See Pages 11-17.

Section 5 Environmental Considerations has been revised and now includes reference to comments from the Statutory Authorities. See Pages (63 - 68).

Concern over impacts arising from construction and operation of major proposals such as Scapa Deep Water Quay

There will be a very detailed Environmental Impact Assessment at feasibility stage which will look at impacts on the environment, other industries and businesses and at construction impacts in particular.

Close engagement with the Statutory Authorities and other key stakeholders will be required up to and during feasibility stage to ensure that impacts are properly assessed and that appropriate and agreeable mitigation measures are identified. A detailed implementation plan will be defined shortly, with input from key stakeholders to build a timeline of actions and milestones.

Need for better integration with other modes, connectivity and sustainability

Proposals at Hatston, Kirkwall Pier and Stromness will go some way to improving access and connectivity through review and reconfiguration of traffic management and pedestrian routes. At feasibility stage consideration will be given to integration with existing transport networks and services so as to ensure that any new harbour infrastructures are accessible and incorporate sustainable transport options. This links in with measures associated with cognisance of decarbonisation targets and developments can link in with other initiatives such as the provision of electric charging points and bicycles at ferry and cruise piers. See Pages 11 – 17.

Many smaller piers and communities have not been included in Phase 1

Phase 2 will commence in 2020 and this will take into consideration the North, South and Inner Isles, as well as the smaller piers around Orkney Mainland.

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Summary of key responses to submissions during consultation period

Potential for proposals to lead to increased cruise vessels and lack of investment in land-based infrastructure to support this

The masterplan does not support or promote a major increase in the number of cruise calls and passengers – rather the focus is on reducing the conflicts between cruise and other harbour-related activity. Enhancements at Kirkwall Pier could enable more smaller cruise ships to call alongside though it is envisaged that there would only be a marginal overall increase in passenger numbers.

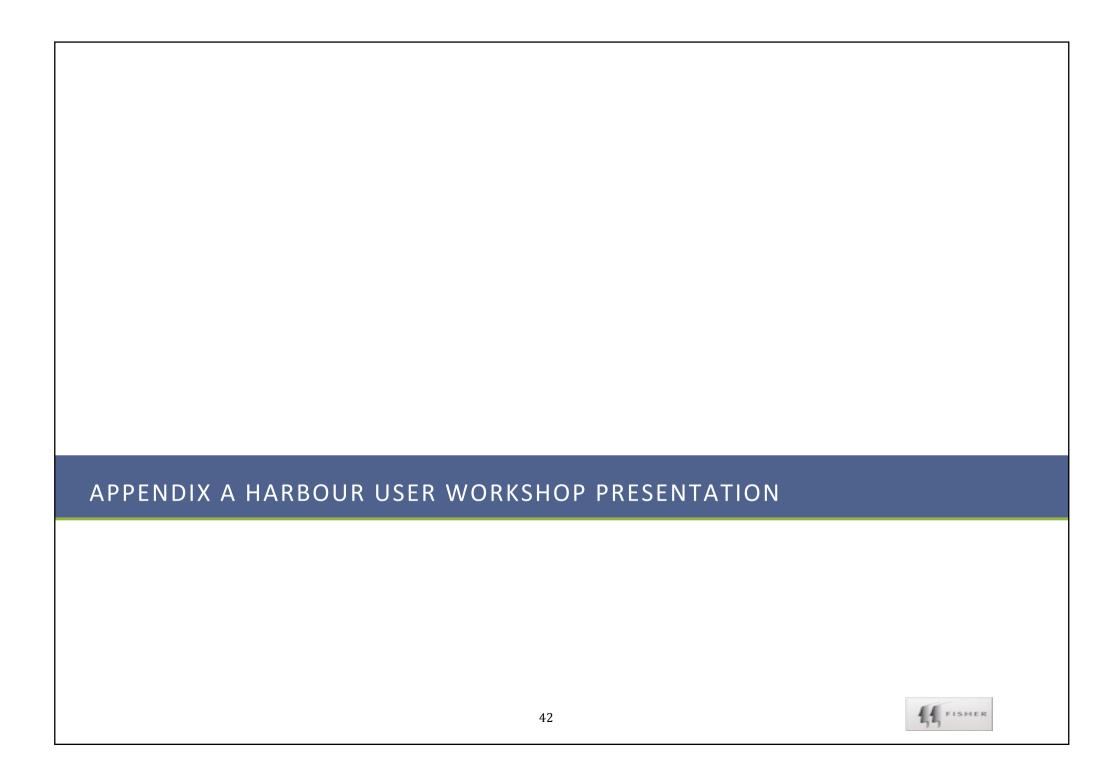
Why is Lyness not being developed?

Lyness has been considered as a possible location for creating a deep-water quayside to service similar markets and indeed this location has been considered for decommissioning and other harbour-related activities in the past. There are a number of key reasons why Lyness is not suitable and reference has been made to this in the masterplan. See Page 53.

The proposals for developing marine leisure are too focussed on Kirkwall and Stromness - there are many opportunities to develop facilities in other locations around Orkney

With regard to marine leisure and the 'sailing offer' in Orkney, the initial focus within Phase 1 of the masterplan is on Kirkwall and Stromness, given that these are the primary marinas in Orkney and are both operating at capacity – all yachts visiting Orkney stay at one or other of these marinas during their trip. It is accepted that a wider strategy is required encompassing the whole of Orkney to create a network of yacht moorings, landing places and pontoons, as well as developing the services to support what is a growing sector. This strategy will be developed during Phase 2 and will build on that which is proposed in Phase 1. See Page 35.





Aims of this workshop

To provide an update on development of the Orkney Harbours Masterplan

To hear your views on key issues and constraints

To hear your views on ideas to be considered in the Masterplan



Principles of harbour masterplanning

Avoid building today that you need to move tomorrow

Consider phasing of investment

Consider zoning of similar activities and avoiding conflicts between users

Explain marine and land requirements to meet defined needs over the period

Ensure adequate landside access

Encourage efficient use of resources



Vision and objectives of the masterplan

Commercial

• Establish a strategic framework and vision that will guide future infrastructure investment decisions towards a coordinated and sustainable future.

Financial

• To safeguard and enhance the financial sustainability of the harbour business within the context of a competitive business environment.

Socio-economic

• To support and enhance the socio-economic prosperity and well-being of local communities.

Environment

• To safeguard and support the long term productivity of the coastal and marine environment through best practice and strong environmental stewardship.



What we will do....

Foundation

Analysis of problems & constraints

Talking to harbour users

Market assessment

Identification of possible opportunities

Identify & assess options

Objectives & outline requirements

Identification of potential options

Appraisal & assessment

Preferred scenario

Masterplan

Draft Masterplan

Public consultation

Final Masterplan



Discussion time

Discussion Topic 1

 What are the key constraints/issues associated with harbour infrastructure?

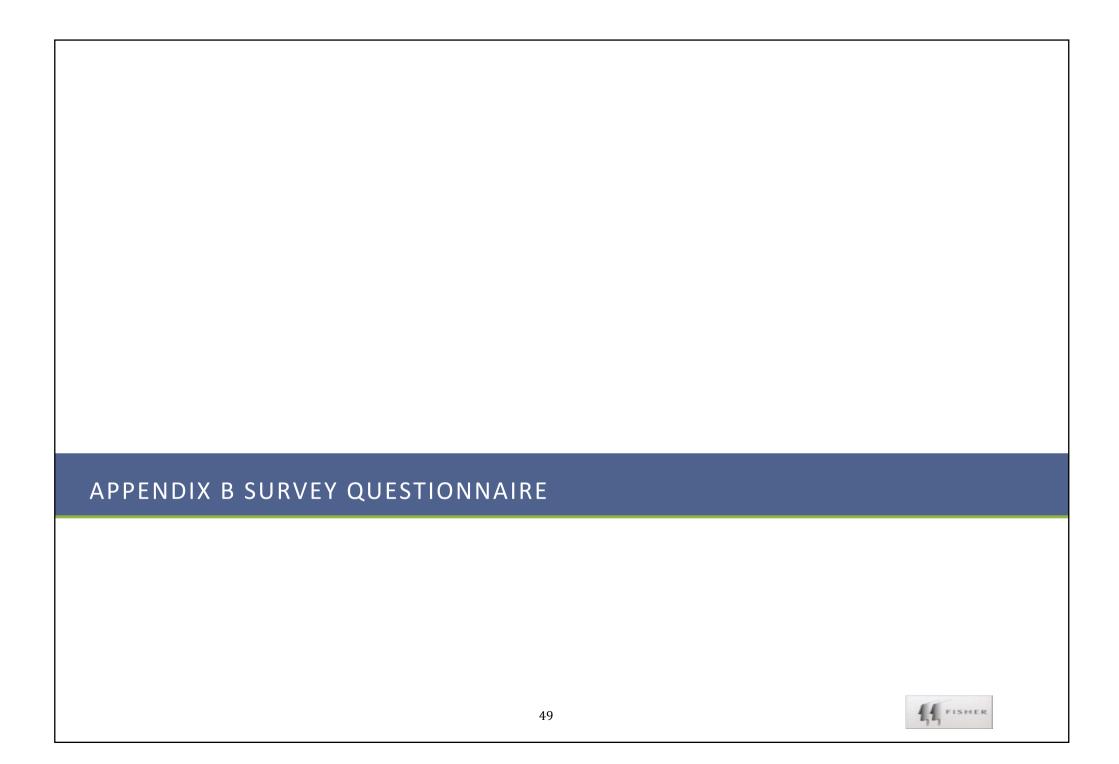


Discussion time

Discussion Topic 2

- What proposals could address the issues/constraints?
- What are the priorities for Orkney Harbours (5yr, 10yr, 15yr+)?





Questionnaire

Q1 How strongly do	you agree with the masterplan	proposals to en	hance harbour
Infrastructure at the t	following locations?		

	Agree strongly	Agree slightly	No opinion	Disagree slightly	Disagree strongly
Kirkwali Pier					
Hatston					
Stromness & Copland's Dock					
Scapa Pier					
New Scapa Deep Water Quay					
Lyness					

Q2 Which of the proposals would you regarded as the highest priority, thinking about the potential impact and benefit to Orkney as a whole?

Proposal with highest priority

Kirkwali Pier	
Hatston	
Stromness & Copland's Dock	
Scapa Pier	
New Scapa Deep Water Quay	
Lyness	

Q3 Why do you think this proposal is of highest priority?

GS Wify do you trink this proposal is of nighest priority?				

Q4 In your view, what level of priority should be attached to each of the masterplan proposals?

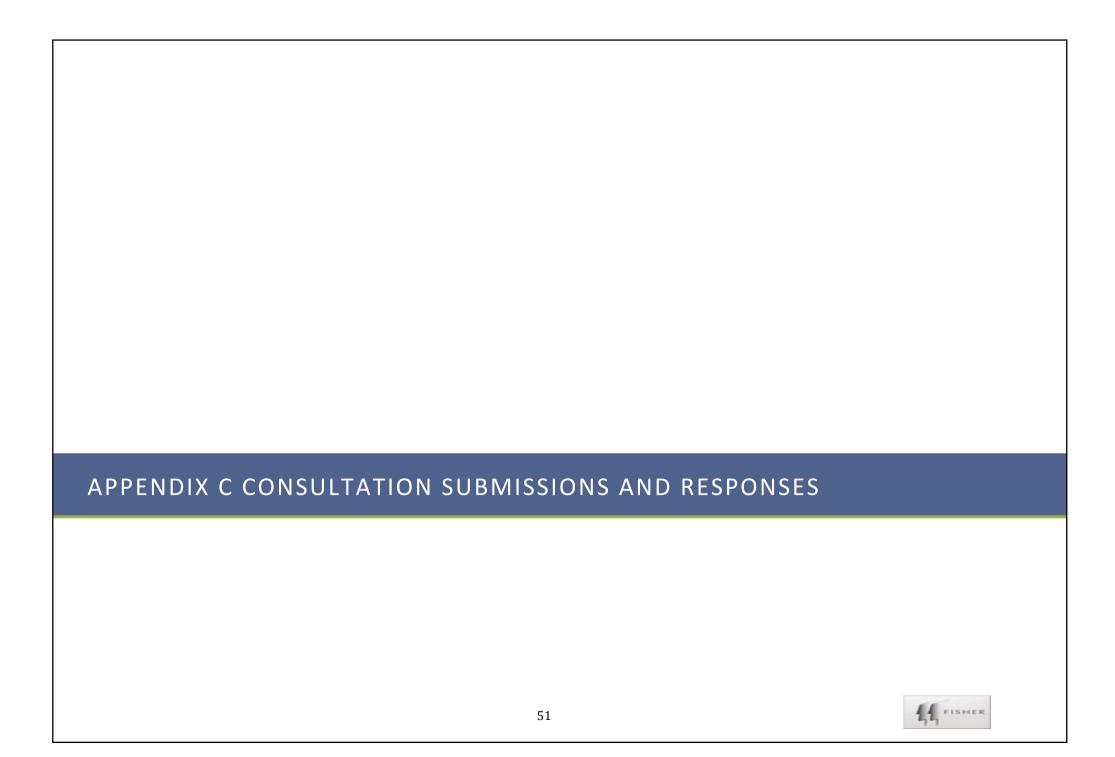
	Very High priority	High priority	Medium priority	Low priority	Very Low priority
Kirkwali Pier					
Hatston					
Stromness & Copland's Dock					
Scapa Pier					
New Scapa Deep Water Quay	у 🗆				
Lyness					

Q5 Do you have any specific comments relating to masterplan proposals or other elements of the Draft Orkney Harbours Masterplan Phase 1?				
I				

If you would like feedback on the development of the Final Masterplan please provide your contact details:

Name:	.Company/Organisation:
Email/Telephone:	





Ref	Comments	Response
1	The harbours' plan must be considered in the context of the Climate Emergency called recently by Orkney Islands Council. Other strategic priorities are referenced in the document but the climate emergency is the highest of priorities. This is an opportunity to tackle the issue of the environmental impact of cruise liners visiting Orkney. Minimum environmental standards should be placed on liners which are allowed to visit Orkney. This could be applied to individual ships or to companies.	The masterplan has been updated to reflect the recent Climate Emergency declaration and revised carbon reduction targets for Scotland, along with a more detailed description of measures to support this policy. See Pages 11 – 17.
	It seems unfortunate, in the light of the Climate Emergency that some of the proposals focus on increasing capacity for the oil and gas industry. Surely this is an opportunity to promote, encourage and enable the development of renewable energy projects, such as the current work on providing clean shore power for some of the island ferries at Kirkwall and the use of battery power for the Hamnavoe at Stromness. Orkney is already a leading hub for research and development in renewable energy and this would further promote the Islands' profile in this area of work too.	
2	I was very disappointed to see that the draft proposal is so unambitious in terms of making swift change away from fossil fuels. Orkney is so well placed to be in the lead in this respect, and yet there is very little mention of renewable energy initiatives and means for reducing carbon emissions. In particular, there would need to be plans for the hydrogen ferry system, and clean shore power for visiting cruise ships and the Hamnavoe. I strongly feel that we have a responsibility to lead here. Why aren't we planning to do exactly that?	



Ref	Comments	Response
3	As part of the Draft Harbours Master Plan consultation I am writing to express my disappointment at the lack of measures to achieve the cuts in carbon emissions that the Orkney Islands Council has committed to in declaring a Climate Emergency, in line with the Scottish Government. This is the first opportunity since declaring the Climate Emergency for the OIC to put words into actions and to demonstrate their commitment to a reduction in carbon emissions.	The masterplan has been updated to reflect the recent Climate Emergency declaration and revised carbon reduction targets for Scotland, along with a more detailed description of measures to support this policy. See Pages 11 – 17.
	Harbour activities are a major generator of carbon emissions, and the cruise ship industry in particular is associated with a massive carbon footprint. Orkney should be leading the way, given our reputation for innovation in marine renewable technologies, in reducing the impact of these activities, and this should be the central strategy of any Harbours Master Plan which is fit for purpose for the future. Measures need to be put in place to provide the infrastructure to make power from renewable energy available at all harbours, and action should also be taken to ensure minimum emissions standards for all visiting cruise ships.	
	The OIC should be congratulated at declaring a Climate Emergency, but this now needs to be followed through and translated into direct actions if it is not to be a hollow gesture.	
4	I am writing in the first place to thank Orkney Island Council for the stance it has taken on climate change. However, I and others feel that it is vital for Orkney Harbours to invest now in developing a low emissions fuel infrastructure, so that visiting cruise liners can adhere to minimum emissions standards. If new fuel bunkering is to be built, it would be totally counterproductive to the Council's commitment to be carbon neutral by 2025 if they invest in a fossil fuel facility. Orkney must, as a county abundant in renewable energy, lead the way, and be seen to be doing so by the rest of the world. We need to enable visiting cruise liners to use our low emissions fuels, and although this will present challenges we should consider nothing less.	



Ref	Comments	Response
5	I was so pleased to hear OIC had declared a Climate Emergency, but I am very disappointed and concerned that their Draft Harbours Master Plan does not address the issues at the heart of the Climate Emergency. What a missed opportunity! Reducing carbons needs to be the core of the Harbours Master Plan.	The masterplan has been updated to reflect the recent Climate Emergency declaration and revised carbon reduction targets for Scotland, along with a more detailed description of measures to support this policy. See Pages
5	Orkney's position at the cutting edge of research into reducing emissions from the marine sector gives us a unique and important responsibility in implementing ways to do this. Projects like using hydrogen to power the inter-isle ferries and using batteries to provide clean shore power to the Hamnavoe should be a key part of the Master Plan. Furthermore, Orkney Harbours could set a brilliant lead in requiring visiting cruise ships to meet minimum emissions standards and oblige them to use our abundant renewable energy as shore power. New fuel bunkering should only be considered within the aim of enabling and encouraging use of low emissions fuel infrastructure.	11 – 17.
5	Within the context of the climate emergency and the forthcoming UK and Scottish laws on emissions reduction targets, the Draft Harbour Master Plan is, sadly, hugely irrelevant.	



Ref	Comments	Response
6	I have just had a read through of the current Harbours Master Plan for Orkney. It is an impressive document, but as a local resident I am surprised that it makes no attempt to integrate with land-based infrastructure in Orkney. The community deserves more and I am shocked that OIC and its constituent parts do not seem able to take a lead in providing an overall view. For example, to date I am unclear whether the community want or need more tourists. Present numbers mean that the visitor experience in Orkney is flawed and local restless. Until the land-based infrastructure for tourism has been enhanced any attempt to increase cruise ship numbers would be irresponsible.	
6	I'm not an expert in the oil industry so I can't comment on predictions of increase, but the thought of disturbing a pristine length of coast to create a site for the decommissioning of rigs is not a good thought. Why not use Lyness, if it has to be done in Orkney at all?	Scapa Deep Water Quay is not intended for decommissioning, rather servicing the offshore wind sector and repair and maintenance of rigs and platforms alongside. The offshore wind opportunity is related to forthcoming plans for an offshore wind farm to the west of Orkney which would be operated and maintained from this location. Lyness has been considered as a possible location for creating a deep-water quayside to serve similar markets and indeed this location has been considered for decommissioning in the past. There are a number of key reasons why Lyness is not suitable and reference has been made to this in the masterplan. See Page 53.



Ref	Comments	Response
6	Overall the document tells me much in terms of what it will do for Orkney Harbours, in terms of increased revenue etc, but nothing about the wider picture: what will it do for the community who live here. So far my reading is that harbours wish to increase tourist numbers, turn Orkney into an industrial processing yard for the oil industry, and destroy an untouched stretch of the coastline for a new deep water terminal. How does that improve life for local residents?	The masterplan does not support or promote a major increase in the number of cruise calls and passengers – rather the focus is on reducing the conflicts between cruise and other harbour-related activity. Investment in harbour infrastructure will enable Orkney to harness considerable benefit in terms of economic activity, jobs, population retention and upskilling not only in oil and gas, but other key sectors such as offshore wind. The masterplan demonstrates significant socio-economic and community benefit. The Masterplan Proposals are being taking forward through a process of sound environmental stewardship and through a robust environmental assessment process to mitigate significant adverse effects on environmental receptors. The masterplan has been updated with some context around port operations and the rationale for investment. Please also note Appendix D, which includes a qualitative summary of the potential benefits arising from each proposal.



Ref	Comments	Response
7	Flotta terminal is winding down, given both national and international commitments to phase out fossil fuels progressively to totally over the next 2-3 decades and major players such as the Rockerfellers and Norway Sovereign Wealth Fund divesting from oil and gas it raises a question of significant risk to the investment of substantial public funds in a project whose main profits are predicated on a rapidly declining industry. It is notable that issues of risk are not addressed in the plan which focuses exclusively on some opportunities. This would seem to be a major shortcoming.	The masterplan has been updated to reflect the recent Climate Emergency declaration and revised carbon reduction targets for Scotland, along with a more detailed description of measures to support this policy. Work is underway to explore possible options for the repurposing of Flotta Terminal: the
7	Because of the way that Orkney Harbours Income is ring fenced, and it being a public body, it would seem reasonable that it undertook to mitigate the environmental impacts it was responsible for directly contributing to, and it already has the health and safety of its employees to consider. Given the significant expansion in cruise ships visiting, their associated pollution and consequent issues for respiratory health of staff and public one priority might be to mitigate this. As a fundamental part of expansion in berthing, mandatory use of shore power and contribution to provide for charging for electric bus and car transport for passengers round the island would seem good for the health and image of all concerned. This would also help redress the potential for a developing financial inequity, as the share of Harbours income to OIC strategic reserve from the oil port dwindles yet its costs supporting the cruise ship tourist infrastructure expand.	the repurposing of Flotta Terminal: the masterplan has been updated to reflect this also. See Pages 11 – 17.
7	Since the report was commissioned a climate emergency has been recognised locally, nationally and internationally with commitments to the Paris climate accord. There would seem good reasons to consider addressing immediate local needs, e.g. Scapa pier and fuel supplies for Orkney, and optimum management of cruise ship needs, infrastructure and pollution primarily. This could be addressed with existing funds.	



Ref	Comments	Response
7	Regarding the justifications for doubling the size of Kirkwall Marina. Largely this is predicated on the increase in visiting yachts. I would suggest that yachts visiting the Orkney Archipelago are largely not just on passage and wish to cruise the area. Likewise to encourage the tourist economy, and the viability of other island communities, solely spending the development resources on Kirkwall would seem both inequitable and counter-productive. Stromness marina funding was not mentioned, and opportunities to develop pontoon facilities at sites such as Lyness, Longhope, Stronsay, other of the Northern Isles, or expansion of visitor moorings was not mentioned. This seems a significant missed opportunity necessary to optimum benefit from any marina development.	With regard to marine leisure and the 'sailing offer' in Orkney, the initial focus within Phase 1 of the masterplan is on Kirkwall and Stromness, given that these are the primary marinas in Orkney and are both operating at capacity – all yachts visiting Orkney stay at one or other of these marinas during their trip. It is accepted that a wider strategy is required encompassing the whole of Orkney to create a network of yacht moorings, landing places and pontoons, as well as developing the services to support what is a growing sector. This strategy will be developed during Phase 2 and will build on that which is proposed in Phase 1. See reference on Page 35.
7	My own belief is that Harbours as a public body should have a conservative approach to risk in investment, and ethical, health and environmental issues should be balanced with economic ones. In these respects the Masterplan is deficient, being more in the style of a corporate sector promotional vision than a balanced consideration of deploying public assets to best effect.	A clearer explanation of how Orkney Harbours operates is provided in the masterplan, along with cognisance of environmental aspects. It should also be noted that a detailed Environmental Impact Assessment would be undertaken for each project, which would consider some of the aspects you refer to, particularly the risks around the environmental impact. See Pages 11 – 17 and 63 – 68.
7	Regarding aquaculture, there are a number of unknowns as to the future of the industry. It is vulnerable to market forces. Returns may prove land-based systems meet environmental regulation and resource costs more effectively. Also locally they may become vulnerable to catastrophic failure contributed to by climate change and eutrophication causing algal blooms. The expansion in jobs growth seems fanciful in the face of the remote control and robotic technologies being deployed. These risks are not considered, again solely opportunities.	There are risks associated with opportunities and developments in each sector. The Outline Business Case considers three scenarios for the assessment of economic benefits, which takes into account such risks: Base, Optimistic and Pessimistic Cases are presented for economic and financial benefits. A more detailed risk assessment will be included for each proposal also.



Ref	Comments	Response
8	Detailed Paper on Sailing Tourism in Scotland and Orkney.	Many thanks for this informative paper, which, if acceptable to the stakeholder, provides important information and data that can be utilised during the development of Phase 2 and the development of a wider strategy for sailing in Orkney.
8	I am in strong agreement with what has been put forward as regards the heading of Kirkwall Pier.	Noted.
8	Scapa Pier: to avoid substantial damage to the ecosystem which includes dredging other alternatives need to be considered in deeper water such as loading buoys, single point mooring or dolphins with a central platform. The former pair may produce difficulties as regards handling multiple grades. The dolphins with a central platform would not have this problem but may need to connect to the pier using a catwalk.	The Scapa Pier project is not of a scale that would involve the type of vessels that would use loading buoys or dolphins. Furthermore, buoys require the provision of undersea pipelines.
8	Scapa Pier: projected plan does show small craft berthed on the outer side of the projected pier and thus exposed to the long fetch across Scapa Flow.	Noted. All vessels will berth where appropriate depending on weather conditions. The Scapa Pier proposals increase options for sheltered berthing compared with the current situation.
8	Scapa Pier: the plan does not indicate the need for reclaimed land and due to its distance from Kirkwall and various facilities, although there is a toilet, there is no apparent need for regular berthing of tourist craft and possibly fishing boats. Yacht skippers often prefer to anchor where a beach or other attraction may be reached by dinghy as this is all part of the holiday.	There is a requirement for some laydown area and parking at Scapa Pier, hence reclamation is included in this proposal. There is a lack of suitable berths for boats providing marine tours – the berths provided here are intended for that purpose though could be used by other small craft. The text has been amended to make this clearer. See Page 43.
8	Do the tugs and pilot boat have to be stationed at Scapa? Wouldn't being stationed in Flotta cut down on the fuel bill or would this increase crew costs?	Given the current manning rota having vessels stationed in Flotta would not be viable on account of fuel and crew costs. It is also the case that serving Flotta is only a proportion of the work carried out by tugs and pilot boats.



Ref Comments

Scapa Deep Water Quay: possibly an ecological disaster. What is the return on capital? As this is a 20-year plan would all the costs be recovered in this time? There are already other places offering deep water berths such as in Norway and the Cromarty Firth would you be able to undercut them and still make a profit? Is the intension to offer the facility to an outside firm and charge them for it? (The Scottish Government are intending to nationalise Fergusons does this mean that the State or Local Government if it comes to that have the ability to run things better than a private company). Can you get intentions to use prior to committing to build (SSEN are very good at that)? Is there a resale possibility?

Scapa Deep Water Quay: has any intention been considered for a floating facility? A barge or vessel with heavy lift facility could be berthed in water of the required depth. A reversal of what would normally be carried out with deep draught vessels or rigs being brought to it rather than the other way around. The facility would be serviced by small craft which in the case of heavy supplies would also happen on a shore based jetty. By using this type of facility should employment not be regular it could always be leased out and hence produce some income. The big attraction of using a barge or vessel is that it can always be moved, owned, leased in or out and if owned have a sale value. It should also have the ability to run on shore power.

Response

Scapa Deep Water Quay will enable Orkney to capitalise on offshore wind farm activity in close proximity, thus promoting renewable energy developments and benefiting businesses and residents within Orkney. This infrastructure also gives Scotland a competitive edge against Norway and other countries, given the proposed depth of water alongside which is substantially greater, even compared with Cromarty Firth.

An Outline Business Case is underway which will ascertain the economic and financial benefits associated with this proposal.

As part of the feasibility stage a detailed Environmental Impact Assessment will be undertaken which will determine the extent of environmental impact.

The nature of how this infrastructure will be managed and operated will be considered in the Outline Business Case. Discussions are underway with companies across a range of sectors that are interested in utilising this infrastructure.

The engineer assessment concluded that a floating facility is not a suitable alternative. For offshore wind and other activities laydown area of at least 5 hectares is required, with straightforward access to and from the quayside.

We will discuss your comments further with our engineers and should any alternative options deliver the same benefits and outcomes as the proposals currently within the masterplan they will be given consideration during feasibility stage.



F	Ref	Comments	Response
8	}	The draft plan states that "There is a lack in appropriate infrastructure and facilities to accommodate existing and future operational activity" and "The plan for Stromness is focussed on improving the flexibility and usability of existing infrastructure, as well as creating capacity and facilities to enable growth in all sectors for the future." To correct the above problems a higher footfall is required in the historic core. This cannot be done to any great extent by the current inhabitants but must come from a large increase in the number of visitors. To do this the Pole Star pier needs to be adapted for use by the explorer type cruise ships. The ex-Northern Lighthouse Board building also needs to be upgraded to possibly a multifunction museum something on the lines of the one in Lerwick but covering just Stromness and boat museum.	The creation of a museum is an excellent idea; however this does not fall within the remit of Orkney Harbours. With regard to the development of Pole Star Quay as a landing berth for small cruise liners the main issue is access to and from this location for busses. Smaller cruise liners can already berth at North Pier thus in our view there is no requirement for an additional berth. It should be noted that a cruise tender pontoon is now included in the masterplan, which will provide a more attractive opportunity for cruise liners at anchor.
8		Draft Plan also states "Whilst the construction of Copland's Dock has enabled some operations to be moved out of the town centre, there remains issues of capacity, conflict of use and traffic and the flexibility of Copland's Dock to cater for different types of vessel, particularly small boats. If Copland's Dock could do this, there would be significant opportunity to remove heavy traffic from the historic town centre.	Noted.
8		There also needs to be a slip with haul out capacity for work, dive and fishing boats. Marine Engineering companies should be encouraged to set up haul out facilities and repair shops.	Throughout the development of the masterplan stakeholders have expressed the desire for additional boat repair/maintenance facilities in Orkney. At present a site is identified at Hatston, though the nature of this facility has not been defined in detail – it could serve the marine leisure market or it could be more focussed on fishing boats, or larger, commercial vessels – any such facility would need to attract a private sector operator.



Ref	Comments	Response
8	Lyness: for any ship to be dry docked or have any considerable work done they need to be gas freed, tank cleaned, decontaminated and proved to be in a fit state to have the necessary work done. Lyness due to its position as regards the North Sea and the Atlantic oil fields is in an ideal place for the above operations. The Golden Wharf would need to be extended out to the 15m contour along its length. Onshore a holding tank for the effluent would be required whose contents would be pumped over to Flotta into the de-ballast treatment system. In time general engineering works could be set up to cover all work other than the under water hull plus there would be work associated with renewables. The establishment could be powered from the proposed SSEN sub station at Rinnigill. If the floating deep water barge was to be stationed to the North of Switha this could also be powered from the same sub station.	Lyness was considered in the development of proposals; due to a number of factors it was not considered as the optimal location to create a deep-water quayside. See Page 53.
8	With a programme that is looking 20 to 30 years ahead I am surprised that there is no mention of an increase in sea water levels. I would have expected to see some mention of how the considerable amount of assets would be protected or have some form of mitigation. I realise that this is mainly a question for OIC as a whole but isn't Harbours the marine side of OIC? Kirkwall town has already seen protection installed but the harbour, itself, has been left to stand on its own. Protection of Stromness harbour would automatically protect the town and this is probably one of the simplest to do.	The Flood Risk Management Strategy for Orkney is produced by SEPA and sets out the vision for how flooding should be managed. It identifies the main flood hazards and impacts, together with the setting of objectives to manage these impacts and a series of prioritised selected actions that aim to achieve these objectives. The Local Flood Risk Management Plan for Orkney, produced by the Council as lead authority, takes forward the actions set out in the Strategy and identifies what works or actions are to be undertaken locally during the period 2016-2022 and how these are to be funded. Reference is made to sea levels and flood risk in the masterplan. See Pages 11 – 17 and 63 – 68.

Ref	Comments	Response
8	Undercover and outside storage, the abilities to repair and maintain hulls, engines, equipment and rigging plus sail making and repairs are essential facilities. Initially it does not have to be a large capital investment as minimal facilities already exist and this type of work has been carried out over the years. The satisfactory completion of this could achieve business opportunities and extra employment.	With regard to marine leisure and the 'sailing offer' in Orkney, the initial focus within Phase 1 of the masterplan is on Kirkwall and Stromness, given that these are the primary marinas in Orkney and are both operating at capacity – all yachts visiting Orkney stay at one or other of these marinas during their trip. It is accepted that a wider strategy is
8	In all the islands surveys should be conducted to ascertain the amount of berths required whether alongside, at pontoons or visitors moorings. The questionnaire would also try to establish how having these facilities would their general wellbeing and businesses be helped.	required encompassing the whole of Orkney to create a network of yacht moorings, landing places and pontoons, as well as developing the services to support what is a growing sector. This strategy will be developed during Phase 2 and will build on that which is proposed in Phase 1. See
8	Orkney needs to build up its capabilities to meet future demand as a marine tourist hub. Due to the perspicacity and effort of Orkney sailors a good start has been made with Orkney Islands Council financing the building of three marinas. Orkney Marinas Ltd as the management body have done an excellent job in advertising at various events resulting in a huge increase in visiting yachts. We now need to keep some of these visiting craft here through the winter months and improve "sail to and Sail through" by providing winter storage and improving our various attractions and methods of access especially in the individual islands.	reference on Page 35.
8	The Orkney Harbours draft Plan generally meets up with future requirements as regards development in Kirkwall. However I do not see a case for a development at Scapa as regards marine tourism as it would tend to detract from Kirkwall and has no benefits other than as an anchorage. It is more important that development for marine tourism should be as mentioned in 3.2.	There is a lack of suitable berths for boats providing marine tours – the berths at Scapa Pier are intended for this purpose though could also be used by other small craft. The masterplan has been updated to make this clearer. See Page 43.



Ref	Comments	Response
8	At present Orkney is almost at the end of the physical trail for marine tourism in Scotland. We need to be more in the middle to establish the 'Sail Through' and get the 'Sail To' but with the possibility of carrying on in other directions of the compass. We need to show that we can supply a service and hence get owners to leave their beloved craft here through the winter months knowing that they will be cared for.	With regard to marine leisure and the 'sailing offer' in Orkney, the initial focus within Phase 1 of the masterplan is on Kirkwall and Stromness, given that these are the primary marinas in Orkney and are both operating at capacity – all yachts visiting Orkney stay at one or other of these marinas during their trip. It is accepted that a wider strategy is required encompassing the whole of Orkney to create a network of yacht moorings, landing places and pontoons, as well as developing the services to support what is a growing sector. This strategy will be developed during Phase 2 and will build on that which is proposed in Phase 1. See reference on Page 35.
8	With all the piers and berths that have been created over the last few years are we able to accept the Tall Ships? If not enough berths what is the possibilities of anchoring either in Kirkwall Bay or at Scapa? There should also be Tall Ships allocated to the various islands that are able to accept them with local communities providing a programme.	The Tall Ships can be accommodated in and around Orkney.
8	With time Scapa Flow wrecks may become too dangerous for recreational diving. As this is a very important part of marine tourism here in Orkney some decisions will have to be made concerning the future. Should certain parts be removed and put on display at Lyness? Should other ships be sunk to replace them?	The Scapa Flow wrecks, and other associated historic assets, have been identified by Historic Environment Scotland/ Marine Scotland as part of a proposed Scapa Flow Historic Marine Protected Area. It is proposed that a management plan be prepared to address the future management of these deteriorating assets and guidance regarding any potential removal of artefacts in accordance with the appropriate legal, policy and licensing requirements.



Burray Community Association

Comments

We note the economic and social objectives of HIE and the Orkney Council Plan referred to in the Harbours Masterplan. We are also aware of the increasing demand in Orkney for marina style berthing for leisure craft visiting from UK, Scandinavia and from local boat owners.

It is the view of the BCA that a leisure pontoon marina facility would be of considerable benefit to the community. Furthermore, having additional marina berths located at Burray village would, we anticipate, improve the attractiveness and accessibility of Scapa Flow and the South Isles as a leisure destination. Burray Village is on the main bus route, has a shop, a restaurant and pub, nearby tourist attractions, a sheltered anchorage and an established boatyard. These points make the village an excellent location for a marina. We would welcome the opportunity to explore how this idea could be incorporated in the Harbours Masterplan to the benefit of all concerned.

Response

With regard to marine leisure and the 'sailing offer' in Orkney, the initial focus within Phase 1 of the masterplan is on Kirkwall and Stromness, given that these are the primary marinas in Orkney and are both operating at capacity – all yachts visiting Orkney stay at one or other of these marinas during their trip. It is accepted that a wider strategy is required encompassing the whole of Orkney to create a network of yacht moorings, landing places and pontoons, as well as developing the services to support what is a growing sector. This strategy will be developed during Phase 2 and will build on that which is proposed in Phase 1. See reference on Page 35.

Orkney Historical Boat Society

Comments

OHBS have appointed Reiach and Hall, Edinburgh to design a boat haven to be built at Coplands' Dock, Stromness. This is the site of a 19th Century boatyard and is the plot surrounded by the old stone walls, immediately North of the new Copland's Dock pier and West of the harbour operational area. We have already consulted the OIC Planners who have agreed to this development in principal. We have advised OIC of the architects appointment and have a meeting scheduled next month with Gavin Barr, head of Infrastructure and Development, to agree the best strategy going forward. We are at the stage of needing to come to an agreement with OIC on how much land from the field immediately to the N of Copland's Dock will be available for a pubic car park so as to separate visitors parking/access from the access of boats to the haven via an approach closer to the new Copland's Pier.

Response

Noted. We look forward to working with OHBS to deliver this project.



Rousay Sailing Club

Comments

The RSC is pleased to see marine developments foregrounded in this way as they are clearly key to social and economic developments on the islands. We would however note that Harbours in the North Isles including Rousay have been excluded from consideration in the current exercise.

The focus of these plans appears to be improving and developing existing mainland facilities. It appears to lack boldness and vision for innovation and a future Orkney including all the small communities which make this archipelago so attractive to the many visitors on which our economy increasingly depends.

Awakening the Giant Marine Tourism Strategy lays out ambitious plans to capitalise on the potential of marine leisure in the whole of Scotland. The extent and scope of development in the current Orkney Harbours Master Plan seems to fall short of the vision given in the Scottish Marine Tourism Strategy.

It is in the nature of Harbours to thrive as part of a network of activities connecting with other harbours. It is suggested that an additional marina will make Orkney overall a more interesting destination for visiting yachts. A provision in Rousay would develop a node in the network of marinas connecting North and West, a particular support to both Stromness and Kirkwall.

The north isles risk being increasingly disadvantaged both socially and economically. Including a more comprehensive response to the Scottish Tourism Strategy in the Orkney Harbours strategy would seem an effective way to mitigate deprivation of the smaller communities like Rousay. It appears that the current phasing of the Master Plan works against current OIC policies in further delaying any mitigation of the current situation, it further misses a huge opportunity to be part of an existing national strategy with considerable government backing.

The historic lack of intent by Orkney Harbours to invest in small island communities as given in strategic case Section 2 – is particularly prominent in Rousay, where no Harbours investment has been made since the building of the ferry ramps and breakwater more than 30 years ago.

Response

Thank you for your detailed response and your plans for developing a marina on Rousay. All comments and proposals will be taken on board as we soon progress onto Phase 2 of the masterplan.

With regard to marine leisure and the 'sailing offer' in Orkney, the initial focus within Phase 1 of the masterplan is on Kirkwall and Stromness, given that these are the primary marinas in Orkney and are both operating at capacity - all yachts visiting Orkney stay at one or other of these marinas during their trip. It is accepted that a wider strategy is required encompassing the whole of Orkney to create a network of yacht moorings, landing places and pontoons, as well as developing the services to support what is a growing sector. This strategy will be developed during Phase 2 and will build on that which is proposed in Phase 1. See reference on Page 35.



Rousay Sailing Club

Comments	Response
We agree that some harbours are struggling to efficiently accommodate multiple users, but the situation in Rousay is critical as there is effectively no harbour, simply a potentially hazardous landing place for our ageing ferry.	Noted.
The development of 'Enhancing Scapa Pier for Marine Tourism' is unlikely to attract any marine tourism, and as a tourism investment risks complete failure since it is at least 3 to 4 sailing hours off any network route. It appears to be a purely industrial development.	The development at Scapa Pier is mostly industrial; however the berths for small craft have been included at this location as a possible berthing point for marine tour providers, rather than for sailing craft.
The proposal to spend 65+ million GBP for a second Scapa Pier rather than a more modest investment in e.g. enhance further existing suitable harbours such as Lyness, would be taking an unnecessary substantial financial risk that by the time (2030) the facilities create a profitable return their reason for being will be substantially cut back by strategies to reduce carbon emissions. Hatston would seem to be more than adequate. However, strategies to capitalise on or support renewables should be developed instead thus reducing island dependence on hydrocarbon fuels.	Lyness was considered in the development of options; for many reasons it is not possible to develop Lyness (see Page 53). There are several reasons why Scapa Deep Water Quay is the preferred option with regard to harnessing O&M activity for offshore wind and servicing specific markets within oil and gas until such time that we have transitioned to a zero carbon economy. Scapa Deep Water Quay will meet the requirements of offshore wind sector and enable Orkney to develop as a hub in this sector. Please see Pages 11 – 17 for more detail on measures to address climate change.
Workshops and discussions with harbour users and other stakeholders - to date, we have not been consulted. We appreciated that 'tailored stakeholder engagement' was/is/shall be undertaken in the creation of this plan and although not previously consulted, we hope that our response will be received positively, and further opportunities for engagement with our island communities, pursued.	It is envisaged that Phase 2 will commence in 2020 and there will be planned visits to each island community. We look forward to engaging with you very soon and appreciate all information submitted as part of your response.



Destination Orkney

Comments	Response
Page 3: Orkney Inter Isles Transport Study, and the associated Outline Business Case: would be good to know the timescale and recommendations from this study.	The OIITS OBC is due to be completed by December 2019.
Page 12: visual amenity, poor accessibility and poor information for visitors travelling on ferries at Kirkwall: how will this be addressed?	As part of the reconfiguration of the quayside there will be better signage, improved traffic management and relocation of facilities to improve access to and from the ferries.
Page 14: through enhancing port infrastructure and developing the wider visitor experience whilst lessening the potential negative impacts locally: what is planned on developing the wider visitor experience?	There will be less requirement for vessels to anchor in the Bay which in turn improves the visitor experience for cruise passengers. There will also be less conflict between cruise and other harbour-related activities at Kirkwall and Hatston which will make the disembarkation and journey away from the pier more enjoyable.
operations and lower carbon fuelling opportunities could become an opportunity: Additional visitor management resource will be required here along with better sign-posting, however this would provide additional footfall through the street,	Signage and walkways from the vessel to the town would be incorporated into the reconfiguration of Kirkwall Pier. At the time of feasibility there would be liaison with Destination Orkney Strategic Partnership and relevant Council departments regarding additional visitor management resource.
P14: Significant uncertainty regarding external and internal ferry services in terms of vessels and service configuration: Concerns on standard of current fleet, capacity and accessibility issues, as well as the online booking facilities all of which need to be addressed in the near future, in order to encourage and support tourism growth in the islands.	The aspects mentioned here are being taken forward as part of the OIITS OBC.



Destination Orkney

Comments	Response
Page 14: Should the Road Equivalent Tariff (RET) be implemented there could be a significant impact in terms of traffic carried. How will this be managed through current harbour resource?	As and when RET is implemented it will be managed through harbour resources.
Page 14: Number of marine tours around Orkney is growing; at present there is no dedicated berth for such tours: better pier facilities would enhance the attractiveness of this tourism product. Yes, this would be welcomed.	Noted. The development of options considered that Scapa Pier could be a suitable location for a marine tour berth, given its proximity to Kirkwall and ability to serve Scapa Flow. With the addition of a cruise tender pontoon in Stromness now included in the masterplan, there may be opportunities for this in Stromness also.
Page 17: should also include Orkney Tourism Strategy 2019 – 2025 and Destination Management Plan 2019 – 2025.	Noted. See Page 93.
Page 17: Would also suggest that reference is made to the Destination Management Plan within the masterplan, as cruise liner activity, transportation, visitor management and marine activity will form part of this document.	Noted. See Page 93.
Page 23: fully support outline requirements G, H, M, O, P, Q, R	Noted.
Page 26: Kirkwall Pier – core proposals comprise new quayside infrastructure, a waterfront development area and marina expansion, as well as improvements to traffic management and facilities on the quayside: this is welcomed.	Noted.
Page 31L Hatston – in the future there may be a need to refurbish and/or extend the existing facility that caters for both ferry and cruise passengers: yes there is a need for this and this development would be welcomed.	Noted. We would welcome discussion with Destination Orkney regarding how this project might be taken forward and funded.



Destination Orkney

Comments	Response
Page 26: Part of the area could be incorporated into the reconfiguration of the marshalling area or relocation of the travel centre does this relate to - the one at West Castle Street - or Orkney Ferries building?	The masterplan text provides a number of examples of what could be developed at Kirkwall Pier – the text has been amended so as not to suggest that there is a definitive plan to amalgamate travel centres (e.g. the Orkney Ferries building with the existing travel centre on West Castle Street) – rather it was illustrative in that it could be something that was taken forward. The actual layout of facilities and buildings on Kirkwall Pier will be determined at feasibility stage, guided by in-depth engagement with relevant stakeholders. See Page 36.
Page 34: Additional shoreside area and marine leisure berths: agree, this would create additional berths for visiting yachts and has the potential to develop marine tours.	Noted. The development of options considered that Scapa Pier could be a suitable location for a marine tour berth, given its proximity to Kirkwall. With the addition of a cruise tender pontoon in Stromness now included in the masterplan, there may be opportunities for this in Stromness also.
Page 37: Stromness and Copland's Dock – reconfiguration of the marshalling area, relocation of marina facilities, waiting room facilities and signage: would this take business away from the town?	There is a masterplan proposal which aims to improve the shoreside area in Stromness; this should on the contrary enhance the town by making the marina facilities and pier area more attractive, as well as improving traffic management.
Page 45: Lyness – could the increased area also include marina area for visiting yachts?	With regard to marine leisure and the 'sailing offer' in Orkney, the initial focus within Phase 1 of the masterplan is on Kirkwall and Stromness, given that these are the primary marinas in Orkney and are both operating at capacity – all yachts visiting Orkney stay at one or other of these marinas during their trip. It is accepted that a wider strategy is required encompassing the whole of Orkney to create a network of yacht moorings, landing places and pontoons, as well as developing the services to support what is a growing sector. This strategy will be developed during Phase 2 and will build on that which is proposed in Phase 1. See reference on Page 35.



Offshore wind developer (confidential)

Comments	Response
Offshore wind construction vessels are large; during construction these vessels would travel to and from a deep-water port, requiring a minimum draft of around 14m at the quayside. The likelihood is that large, slow moving construction vessels would not transit through the Pentland Firth against the tide, in restricted visibility or adverse weather but transit around the North of Orkney. Clearly a deep-water staging port on Orkney would significantly reduce transit times and maximise the weather window for construction.	Noted. We understand that Orkney has an opportunity here to be active in the development of offshore wind.
Lyness Pier was initially considered; however the steep seabed slope at the quayside prohibits the use of jack-up vessels and the 5m – 8m draft is too shallow. We understand that Lyness Pier is listed which would complicate any efforts to make this site fit-for-purpose. A new, purpose built deepwater quay in the natural shelter of Scapa Flow would service the growing offshore wind market in the North of Scotland and in doing so become a great asset to Orkney's economy.	We concur with your views on Lyness Pier and the issues surrounding its potential development. An Outline Business Case is currently being developed which will assess the financial and economic benefits associated with all proposed developments including opportunities to provide harbour infrastructure for the offshore wind sector.
5 hectares of laydown area is considered an absolute minimum (Scapa Deep Water Quay). The larger the laydown area the greater the flexibility.	Noted. We will consider whether or not it is possible to create additional laydown area (phased) at feasibility stage.
Scapa Deep Water Quay layout: a simpler square/rectangular shape with reinforced quaysides would be preferable for offshore wind.	Noted. We would seek to engage with potential users prior to feasibility, with a view to designing the infrastructure appropriately.



Royal Yachting Association Scotland

Comments

Page 4 bullet point 3: the paragraph is correct and fine as a summary. However, the figure for boat numbers does not include any vessel that anchors. Skippers may anchor for a number of reasons and not just to save money. For example, marina berths might be full or the anchorage may be a better setting off point for, for example, Fair Isle. The economic impact also depends on the number of nights spent in Orkney whether for reasons of adverse weather, crew changeover or tourism.

Response

There is limited availability of data regarding boats at anchor. With regard to quantifying the economic impacts, this will be done as part of an Outline Business Case which will be completed in Autumn 2019.

With regard to marine leisure and the 'sailing offer' in Orkney, the initial focus within Phase 1 of the masterplan is on Kirkwall and Stromness, given that these are the primary marinas in Orkney and are both operating at capacity – all yachts visiting Orkney stay at one or other of these marinas during their trip. It is accepted that a wider strategy is required encompassing the whole of Orkney to create a network of yacht moorings, landing places and pontoons, as well as developing the services to support what is a growing sector. This strategy will be developed during Phase 2 and will build on that which is proposed in Phase 1. See reference on Page 35.

Page 14 Boat repair/maintenance facility. Recreational boats can be added to the list of potential users of such a facility. There may be scope for developing the boat repair and maintenance, construction and training sector although this may better be considered as part of the Regional Marine Plan. British Marine Scotland and Orkney Historic Boat Society may be able to contribute to developing a strategy. There may be demand for additional lift-out space for local recreational boats for winter storage, as well as for continental boats wishing to spread a cruise to the Northern Isles over two years.

Noted. There could be opportunities for winter storage and lift out facilities at Hatston and Kirkwall. A site for boat repair is identified at Hatston, though the nature of this facility has not been defined in detail – it could serve the marine leisure market or it could be more focussed on fishing boats, or larger, commercial vessels. As part of Phase 2 further consideration will be given to marine leisure requirements with regard to facilities and services that might be required in the future.

Boat repair facilities required to support recreational users can also be considered as part of the regional marine planning process.



Royal Yachting Association Scotland

Comments	Response
Page 14 Marine Leisure. It may be helpful to use an AIS website such as marine Traffic to look at the sizes of yachts berthed at Victoria Pier and Albert Dock in Lerwick. The longest today was 17m long and that probably does not include the bowsprit. It will be worthwhile subdividing the commercial category as dive boats, which are particularly important at Stromness, are likely to have different requirements from tour boats.	Noted.
Page 15 Short term marine leisure. A berth at Scapa Pier might be particularly popular with dive boat operators and also marine tourism operators servicing cruise liners berthed at Kirkwall. Appropriate facilities might also be attractive for local boats and for visiting skippers wishing to leave their boat for an extended period of time or to facilitate a crew change. However, the demand for this would need to be assessed.	Noted.
Page 26 last sentence. It is very important to ensure that there is dedicated space for visiting yachts.	Noted. See Page 33.
Page 34 column1, last sentence. Note should be taken of the implications of the Climate Change Bill which has completed stage two. It is unclear what implications will be for recreational boating but with electricity produced from wind and tidal power orkney would be well placed if there was a move towards electrical propulsion based on fuel cells. This comment applies to all facilities.	The masterplan has been updated to reflect the recent Climate Emergency declaration and revised carbon reduction targets for Scotland, along with a more detailed description of measures to support this policy. See Pages 11 – 17.
Page 34 last sentence. Consideration should be given to providing space for future expansion of marina berth numbers. Access to the slipway by small recreational craft on trailers should be considered.	The berths at Scapa Pier are intended for marine leisure use, and it is unlikely that the number proposed here would expand in the future, given the commercial nature of the pier. See Page 43.



Royal Yachting Association Scotland

Comments	Response
Page 37 Stromness. Stromness Marina is an excellent facility, particularly for vessels on passage to Pierowall, Shetland or mainland Scotland. The toilet and shower facilities shared with the ferry are very good, there is easy access to a supermarket and other shops and the town is a joy to walk through. From a navigational point of view, timing the exit by Hoy Sound is easy due to its proximity. However, space is at a premium and manoeuvring space at the south end can be constrained by commercial vessels moored to the pier. There may be scope for relocating some commercial activities, or even local boats, to Copland's dock or Scapa Pier if these could be made attractive options. however, one of the attractions of Stromness Marina is the mix of boats encountered, particularly the local yoles. A minor point is that there is not a clearly marked route from the marina entrance to the ferry terminal and the recycling facilities are in the ferry car lines.	The improvements on Copland's Dock should make it more attractive to commercial vessels. There is a proposal to improve the shoreside area in Stromness, which will consider parking, pedestrian routes, traffic management and facilities – your points regarding access and recycling facilities will be taken into consideration as part of this proposal.
Page 53 SEA. This section focusses overmuch on negative impacts. Good planning should lead to positive impacts.	Noted. The purpose of the SEA is essentially to identify negative impacts and illustrate potential mitigation measures at plan level.
Page 53 Climatic factors: to reach Scottish Government targets, the carbon footprint will need to decline during the operational phase. Development provides an opportunity to invest in energy efficient technologies.	The masterplan has been updated to reflect the recent Climate Emergency declaration and revised carbon reduction targets for Scotland, along with a more detailed description of measures to support this policy. See Pages 11 – 17.
Page 53 Cultural heritage. There are potential positive benefits if the developments encourage boat building and repair of historic classes of boat as well as them being sailed.	Noted and agreed.



Royal Yachting Association Scotland

Comments	Response	
Page 53 Population and human health. The risk of marine accidents could be reduced by separating different types of activities as proposed. The Statutory Harbour Authority has powers to make regulations to ensure safety of navigation and increased traffic does not necessarily lead to an increased risk of accidents.	Noted. The SEA has focussed on the likely negative impacts on population and human health and how these effects can be appropriately mitigated.	
Page 54 first bullet point. Surveys have shown that marine biodiversity is very much appreciated by recreational sailors. Scottish Hydro Electric Transmission plc has been investigating the adoption of Biodiversity Net Gain and consideration should be given to applying these principles here.	We understand that Biodiversity Net Gain is something that is being introduced into the planning regime; by the time any of these proposals are at feasibility stage it is envisaged that this will indeed be part of the process. The masterplan does include assessing opportunities to enhance the environment with measures such as habitat reinstatement and the use of green infrastructure. See Page 16.	
Page 57 Integration with the planning and policy framework. It is surprising that no mention has been made of the Orkney Islands Marine Region Plan which will supersede the PFOW Spatial Plan. A Ministerial Direction is expected to be issued shortly to allow the establishment of the Orkney Islands Marine Planning Partnership.	Noted. Reference has now been made. See Page 92.	
Page 80 Proposed development policy principle 2. As this proposal applies to all vessels it should be noted that recreational craft may keep in shallower water outside the main navigational channel. Any tidal devices installed in the channels leading to Scapa Flow should be well below keel depth.	The text in Proposed Development Policy Principle 2 has been amended to clarify that no marine or coastal development and/or activities should have a significant adverse impact on safe passage through any sound (e.g. West Weddel Sound, Switha Sound, Gutter Sound). The Policy Principles will be applied to developments and fixed installation proposals as opposed to recreational craft.	



Scottish Sea Farms (SSF)

Comments	Response
Aquaculture – lack of welfare facilities for staff at Tingwall and Houton piers.	Noted. Proposals for Tingwall and Houton will be considered in Phase 2.
Aquaculture – lack of facilities for carrying out repairs and maintenance on barges and larger vessels.	There are proposals for a boat repair facility at Hatston, which could provide such services for the aquaculture industry.
Lack of facilities for the construction and repair of fish farm pens.	We would welcome discussion with Scottish Sea Farms to identify a suitable location.
Berthing space at Kirkwall is an issue and enhancements here are welcomed.	Noted.
Lack of maintenance of the Eday pier has been an ongoing concern, the fendering needs improved and the ladders replaced.	This issue will be addressed in Phase 2, which is due to commence early in 2020 if not before.
Kirkwall Pier is very important to SFF. We have an office plus storage yard and a feed store. There is mention of demolishing some existing buildings but no detail on what will replace them. SSF will always require feed storage and office facilities at this location.	The reconfiguration of Kirkwall Pier, including the possible demolition and/or relocation of facilities will only be done in consultation with existing users. There may be an opportunity for SSF to have improved facilities in the future, or it may be that your existing facilities remain where they are.
Scapa Pier: SSF would welcome any extension to this pier, and as such access and a berth for our site vessels would be required.	Noted.



Scottish Sea Farms (SSF)

Comments/views

Whilst SSF are not averse to the idea of a new deep-water facility in Scapa Flow we do have significant concerns over the construction and operation of deep-water quay proposal at Scapa. The location proposed is just 1.5km north of our existing Westerbister farm which would be very sensitive to potential changes in water quality and noise levels during construction. Given the scale of quay and land reclamation required these effects could be significant and may be difficult to manage. In terms of risk during the operation of the proposed quay we have concerns over potential pollution, noise levels from maintenance of rigs, and the potential introduction of invasive non-native marine species.

While impact on water quality from construction and invasive species from operation were listed in the SEA we feel that they require greater consideration in relation to effects on other industries and should be listed as 'potential impacts' for relevant proposals in Appendix B.

Based on recent experience of construction and operational issues, we feel that actions which improved or would have improved potential consideration and management of potential risks include: early discussion on construction methods, timing and mitigation proposals, sharing of method statements and risk assessments, undertaking of the relevant environmental studies, and all of these aspects being agreed under a specific Management agreement between ourselves and operators/construction company.

Following a recent meeting, SSF understand that these principles do not apply to ongoing operations but would apply to any changes or expansion of sites. SSF request that this is made explicitly clear in Appendix C.

Response

There will be a detailed Environmental Impact Assessment at project level, given the very nature and location of the proposal and this will certainly consider in detail potential impacts on SSF business activity in close proximity. It is envisaged that there will be close consultation and communication with SSF during this process.

With regard to construction, your comments regarding potential impacts and whether these can be mitigated or not will be taken on board and we will work with you to develop an agreeable construction method and plan that will mitigate impacts as far as possible.

Noted. It should be noted that these Policy Principles are not intended to affect any existing operations, such as aquaculture sites already present in Scapa Flow; they will however apply to any such new sites or extensions to existing sites. See Page 18.



Scottish Sea Farms (SSF)

Comments	Response
SSF are concerned that the principles will remove any potential to expand Hunda or Westerbister in the future. We would wish to see any such proposal considered on its own merits, with the economic benefits considered alongside any potential for impacts on harbour interests when determining whether the proposal meets planning policy.	Fish farm development proposals in Orkney, including the expansion of existing sites, will be assessed against Orkney Local Development Plan Policy 12 - Coastal Development: Aquaculture and Supplementary Guidance: Aquaculture, Development Criteria 1-10. OLDP Policy 12 states that proposals for finfish and shellfish farming developments (including the expansion of existing sites) should maximise opportunities to deliver social and economic benefits for local communities, and that significant consideration will be given to the assessment of social and economic impacts associated with a development proposal. The Development Criteria 8: Other Marine Users states that proposals for new aquaculture development and extensions to existing aquaculture development should have due regard to other marine users including Port and Harbour Area operations (including ship to ship operations). The supporting policy guidance states that development that would have a significant adverse impact on Harbour Area operations and/or navigational safety will not be supported by the planning authority. In light of the strategically important harbour infrastructure proposals within the Draft Orkney Harbour Master Plan (Phase 1), the Proposed Development Policy Principles have been prepared to provide greater clarity to other users of Scapa Flow when the planning authority assesses the impact of development proposals on Harbour Area operations and/or navigational safety.
Policy Principle 3 seeks to safeguard strategic navigational channels for all vessels entering and exiting Scapa Flow. SSF feel that the use of the word 'impede' is not appropriate as it could be interpreted as both a complete obstruction of navigation or hindering navigation, the latter not necessarily equating to a significant adverse effect.	Noted. See Page 83.



Sheila Fleet

Comments	Response
For our business in Kirkwall on Bridge Street, in recent years since the change of the drop off point of passengers to the new travel centre there has been a drop in sales. This is recovering, but the ability to attract small to medium size cruise liners is good as they are more affluent and in many cases spend more. It's a misconception that all cruise liners spend money on the street. I can see our new development here at the Kirk Gallery and Café being able to accommodate smaller private tours from these smaller ships as part of a new excursion, maybe based around retail or shopping but this is something to discuss with the Shore Ex operators if this was to come to fruition.	Noted. As and when the proposals for Kirkwall Pier enhancements move forward we would envisage working closely with key stakeholders such as Destination Orkney and Council departments.
With the extension of the Kirkwall Pier and developments, I see this as a positive investment and can see benefits. Would passengers be bussed to the travel centre from here or would they walk down Bridge Street? I know there are many questions, but in principal we would support this development and wish to be kept involved with the process as it is debated in the council by members.	The whole management of cruise passengers on shore is something that would be considered during the feasibility and environmental assessment stages. We aim to keep stakeholders up to date with how proposals develop over the next few years.



Triton Marine

Comments	Response	
The Scapa deep water development, this is only suitable for the proposed uses and not for further development where heavy lift may be required, there is a large lay down area shore side for light structures, wind turbines etc but not suitable for heavy lifts like 1200t tops sides etc for decommissioning. The T piece of the quayside is not robust enough for heavy lifts either and needs to be wider than 30m to allow the topsides etc to be moved on a crawler system to a laydown area.	when the proposals move to feasibility stage at which point the le of the decommissioning opportunity in Orkney will be better	
Lyness option is good but to allow deeper draft vessel to use the facility then the jetty front would need to be extended into deeper water and extended further North to allow for dual usage.	Lyness was considered in the development of proposals; due to a number of factors it was not considered as the optimal location to create a deep-water quayside. See Page 53.	
I believe there is also ongoing discussions with the MOD regarding the oil contamination at Lyness and who has responsibility for the clean-up. Has a cost been indicated for this?	An indicative cost to remediate is available and that will be part of the ongoing discussion with the Ministry of Defence.	
I have had previous dialog with Orkney Harbours regarding the potential for Decommissioning in Scapa flow and I will be having further meetings in the near future.	Orkney Harbour Authority would be very keen to attract decommissioning activity to Orkney, and have had discussions previously with players in the market. The recent study conducted EY suggested that decommissioning would not be a real market opportunity for Orkney until the West of Shetland assets were at t end of their life; however, should a company operating in the mark bring forward a concrete opportunity, then Orkney Harbour Authority would be interested in discussing infrastructure requirements.	



EMEC

Comments

Shoreside power should now be a standard offering. Whether from electrical connections or through hydrogen to electricity. They should not be retrofitted but provided as standard. This may require large batteries or other storage mechanisms so they should be factored into plans as the energy potential of the units may require the area to be classified for its explosive/fire risk.

Climate change will bite during the period of the planning horizon. If it does then it would make sense to be ready for it through the consideration of how this will affect harbours and specifically any works planned. Personally I feel we may need to abandon the existing harbour area in Stromness and build a dyke across from Copland's to the Ness and move the ferry berthing to the sea-ward side if sea-level rises are more than a metre or so. The alternative is that much of old Stromness will become uninhabitable. So whilst radical, I feel you ought to at least understand how sea-level rise of several metres will affect your assets and enable or obstruct other activity.

Opening up of the Northern Maritime Route. We will see ships coming in from a different direction and acting as Willie indicated happens at Falmouth. i.e. last chance to stock up before the journey. That will require bunkering capacity here for whichever is the fuel of choice. The fact that ships on that route will be newer will probably mean newer fuels. We need to be ready for both fossil LNG, but also H2 and its derivatives. The market will decide which will win out, but we should not just pin our hopes on LNG due to its polluting nature in a net zero carbon world.

The omission of Flotta from the plan leaves too many questions and should be corrected/clarified. Flotta represents Orkney's marine future beyond dirty fossil fuels and Orkney should express its interest in maximising that in the light of its self-declared Climate Emergency.

Response

The masterplan has been updated to reflect the recent Climate Emergency declaration and revised carbon reduction targets for Scotland, along with a more detailed description of measures to support this policy. See Pages 11 – 17.



Extinction Rebellion

Comments

XR Orkney is concerned that the Harbours Draft Master plan does not include any measures to achieve the cuts is greenhouse gas emissions that have been committed to by the Scottish and UK Governments. Without a clear strategy to reduce emissions from Harbours activities the plan is not fit for purpose.

The Climate Change (Emission Reduction Targets) (Scotland) Bill, that is currently at committee stage in the Scottish Parliament, is set to legally commit Scotland to reduce its greenhouse gas emissions to net zero by 2045. This is five years earlier than the legally binding commitment by the UK Government to achieve net zero by 2050. Reflecting the short timescales on which emissions must be dramatically cut at all levels of society, Orkney Islands Council itself recently declared a Climate Emergency. However, the Harbours Draft Master Plan does not present any strategy or master plan to reduce the emissions associated with Harbours activities. This represents a missed opportunity to build on Orkney's reputation for innovation in this area and for Harbours to provide leadership on this issue. It also means that once the new emissions reduction targets are incorporated into Scottish law, the obligations that will follow on councils to reduce emissions across all areas of their responsibility will render the Draft Master Plan out of date.

The central aim of the Draft Master Plan is to ensure that Harbours has the infrastructure to maximise revenue from future oil and gas activities. While it is recognised that such activities play an important role in the Orkney economy, in the context of the ambitious legally binding emission reduction targets set by the Scottish and UK Governments, any strategic plan produced by the council must have the rapid reduction of greenhouse gas emissions at its core. Not recognising this risks investing in stranded assets which will not generate the expected revenue in the net zero greenhouse gas emissions economy of 2045.

Response

The masterplan has been updated to reflect the recent Climate Emergency declaration and revised carbon reduction targets for Scotland, along with a more detailed description of measures to support this policy. See Pages 11 – 17.



Extinction Rebellion

Comments

Reducing greenhouse gas emissions is something that Orkney is good at. Orkney is currently at the cutting edge of research into the use of hydrogen to power inter-isles ferries and to use battery power to provide clean shore power to larger vessels. This builds upon Orkney's strong capabilities in marine renewable energy. XR Orkney believes that it is projects like these that should form the core of the Draft Master Plan. For example, a strategic aim should be to build the infrastructure to make clean shore power available at all harbour facilities, and if fuel bunkering is to be proposed it should be to encourage and enable the use of low emissions fuels.

The cruise line industry is another area where Orkney can build on its reputation for innovation and take a leadership role in reducing emissions. Orkney should impose minimum emissions standards on the cruise ships visiting our waters. When cruise ships dock at our shores they should be obliged to use our clean and abundant renewable energy to power their vessels. XR Orkney recognises that building a low emissions fuel infrastructure involves engineering challenges, but that is exactly why it needs to be considered in the Draft Master Plan.

OIC should be applauded for their recognition of the Climate Emergency and their pledge to act to tackle it. The Draft Harbours Master Plan is the first major opportunity for the OIC to demonstrate that they intend to act on this pledge. Without a clear strategy to dramatically reduce emissions from harbours activities, and to ensure that future sources of revenue are aligned with a net zero emissions economy of 2045, the Draft Harbours Master Plan is not fit for purpose.

Response

The masterplan has been updated to reflect the recent Climate Emergency declaration and revised carbon reduction targets for Scotland, along with a more detailed description of measures to support this policy. See Pages 11 – 17.



Orkney Renewable Energy Forum

Comments

All vessels when in port need to be connected to shore supplied renewable energy, or to be burning carbon free hydrogen or synthetic liquid fuels. In terms of efficiency shore connections are by far the most efficient, with hydrogen in the middle and synthetic liquid fuels being the worst and only expected to be used for vessels either already constructed or which will be constructed over the next two years at the most.

All vessels which require refuelling need to be supplied with either electricity to charge batteries, hydrogen or with synthetic liquid fuels. Orkney is well placed to supply the first two directly and may need to source the third from other sources in limited quantities. We do not see liquified natural gas as a long-term solution but welcome the plan to include ship based bunkering facilities for LNG for those ships currently under construction and which might be constructed over the next 5 to 10 years before hydrogen takes over as the fuel of choice for large ships.

The master plan covers major port infrastructure, but it also ought to consider operations, including those vessels used directly or under contract to manage the harbours. Both pilot boats and tugs will over time need to be replaced and the master plan ought to include a commitment that these will be powered by batteries, or hydrogen, or a hybrid between the two sources of energy as appropriate for the duties the particular vessels need to carry out. This could most effectively be expressed as a commitment to not purchase any diesel-powered vessel in the future.

In terms of physical extensions to the piers suggested in the master plan, OREF is happy that each of them could potentially provide a sound basis for investment by Orkney Harbours, provided that the plans are modified to include the relevant electricity connections and hydrogen supply equipment required to fuel all vessels expected in a net negative greenhouse gas emissions future. From discussions at the public meetings it was clear that the need to build infrastructure to cope with increased sea levels was understood. However its not clear that the plans are integrated with flood defence planning for future sea level rises, particularly at Kirkwall and Stromness where access to current infrastructure could be cut off by future flood prevention schemes.

Response

The masterplan has been updated to reflect the recent Climate Emergency declaration and revised carbon reduction targets for Scotland, along with a more detailed description of measures to support this policy. See Pages 11 – 17.



Orkney Renewable Energy Forum

Comments

We support the plans to provide over the near to medium term liquefied natural gas bunkering facilities where they make commercial sense to refuel the currently under construction fleet of LNG cruise ships as this will significantly reduce the particulate emissions from these important elements of Orkney Harbours operations. However, LNG does not provide a significant improvement in terms of greenhouse gas emissions, we believe that a target should be set to offer equivalent hydrogen fuelling options to encourage future cruise ships to operate with hydrogen rather than LNG at Hatston. This date should be no later than 2030 with fuelling for smaller vessels being available at a much earlier date at Hatston or Kirkwall, Stromness, Scapa and if constructed at the deep-water port on the east side of Scapa Flow.

Response

The masterplan has been updated to reflect the recent Climate Emergency declaration and revised carbon reduction targets for Scotland, along with a more detailed description of measures to support this policy. See Pages 11 – 17.

Additional space at Hatston is needed in order to ensure enough space is available for future developments in renewables in and around the north of Orkney. Making the additional space available for these developments at Hatston, along with other uses could be considered as worthwhile and OREF would support this development on a more speculative basis than other developments, to enable and encourage the future development of marine energy in and around Orkneys northern isles. There is likely to be a surge in demand for space for marine renewables at the time the Orkney Grid reinforcement project comes to fruition. This is expected to be around 2024 and at least some of the additional space proposed at Hatston ought to be available by 2024 in order to allow these marine developments to go ahead.

Noted. The proposal for Hatston indicates that space could easily be earmarked for future renewable energy developments. As and when this proposal moves forward further consideration will be given to this and other potential markets as they develop. It will be important to engage with organisations such as yours in order to monitor the development of renewable energy projects and the various requirements that come with this with regard to accommodating and handling devices, maintenance, etc.



Orkney Renewable Energy Forum

Comments

If a request is made to extend Scapa Pier to allow larger tankers to off load fuel this should be discouraged as liquid fuel use is expected to decline considerably as Orkney moves to a lower carbon future and the need for a larger pier for this purpose would soon disappear. The master plan at present suggests that this would be a non-optional decision based on a need to continue to supply liquid fuels by tanker. Synthetic liquid fuels for the use of older boats is potentially already catered for at Hatston and this could become a central hub for synthetic liquid fuel distribution to other locations both for marine use and for agriculture and road transport.

Response

The masterplan has been updated to reflect the recent Climate Emergency declaration and revised carbon reduction targets for Scotland, along with a more detailed description of measures to support this policy. Orkney Harbours is focussed on supporting transition to a zero-carbon environment.

In the short to medium term Orkney is going to remain reliant on the delivery of fuels such as petrol, diesel and kerosene, though it is recognised that volumes of these fuels will decrease thereafter as new lower carbon fuels come on stream. Thus at present and for much of the lifetime of the masterplan there is a concrete need for the delivery of fuels and vessels supplying these fuels continue to grow in size. See Pages 11 – 17.

It is also worth noting that piers and quays will still be required for the transhipment and bunkering of zero carbon fuels in the future and it is inevitable that tankers carrying lower carbon fuels such as LNG or even hydrogen are likely to be larger than the current tankers transport fuels today.

The development at Scapa Pier is not intended just to support the delivery of fuel: it is the primary infrastructure that services Scapa Flow generally and is at capacity with regard to this.



RSPB Scotland

RSPB Scotland understands the need to future-proof income for Orkney Islands Council (OIC) following the expected decommissioning of the Flotta Oil Terminal in coming decades. However, we feel the proposals conflict with climate change ambitions as they seem to predominantly focus on and prioritise provisioning the oil and gas industry in the short to long term by developing shoreside facilities to support and grow this sector. In light of the First Minister and OIC declaring a 'climate emergency' it must be clearly demonstrated how any proposals that come forward are compatible with Scotland's carbon reduction targets - including the commitment to achieve net zero greenhouse gas emissions by 2045. The harbour limits include two proposed pSPAs – Scapa Flow and North Orkney. These both support internationally important populations of wintering waterfowl

Response

The masterplan has been updated to reflect the recent Climate Emergency declaration and revised carbon reduction targets for Scotland, along with a more detailed description of measures to support this policy. See Pages 11 – 17.

The harbour limits include two proposed pSPAs – Scapa Flow and North Orkney. These both support internationally important populations of wintering waterfowl. Whilst we agree with the content of Section 5, the potential impacts on these pSPAs and need for thorough assessment through an Appropriate Assessment should be highlighted.

Noted. An HRA Screening has been undertaken which highlights the requirement for an Appropriate Assessment. Detailed EIAs will be undertaken for each proposal which will allow for more detailed assessment of these aspects at project level.

Section 5 Environmental Considerations has been revised. Se Pages 63 – 68.

Assessment of impacts on other sites with international and national importance e.g. SPAs, SACs, ncMPAs and SSSIs should also be included and their importance recognised within the Masterplan. For example, encouraging more oil and gas tankers within Scapa Flow would increase shipping traffic and potentially cause disturbance to species within the Scapa Flow pSPA. RSPB Scotland continues to have concerns regarding STS within Scapa Flow. 2018 has seen the highest number of transfers and volumes recorded since operations began - 66 operations involving the transfer of 4.8 million tonnes of oil. The Masterplan states that this is expected to continue and will encourage more.



RSPB Scotland

Comments	Response
We understand the benefit of providing harbour improvements to encourage more cruise ships to Orkney. However, before more cruise ships arrive, OIC will need to ensure that onshore infrastructure is sufficient and that the impacts of increased footfall at the most popular tourist sites (which include natural heritage sites) are mitigated.	The masterplan does not support or promote a major increase in the number of cruise calls and passengers – rather the focus is on reducing the conflicts between cruise and other harbour-related activity. Enhancements at Kirkwall Pier could enable more smaller cruise ships to call alongside though it is envisaged that there would only be a marginal overall increase in passenger numbers. There is currently a joined approach to addressing these issues through joint working between the Destination Orkney Strategic Partnership, Orkney Harbours and wider Council departments.
We noted that there was very little mention of biosecurity plans and non- native species prevention within the Masterplan. Since the Masterplan's focus is encouraging more use of Orkney waters and harbours, we would like to see more information provided about how ballast water exchange will be dealt with. We would like to see OIC's Ballast Water Management Policy updated and strengthened alongside the Masterplan.	Noted. These aspects will be addressed at feasibility stage/through the completion of a detailed Environmental Impact Assessment for each proposal. The OIC Ballast Water Management Policy is compliant and exceeds the requires of the IMO Convention and therefore is currently fit for purpose.
Invasive non-native mammalian predators such as rates and stoats pose a severe threat to Orkney's native wildlife. The ongoing Orkney Native Wildlife Project is the largest stoat eradication of its kind in the world. Ensuring that mammalian predators do not arrive on islands where they are not currently present in the archipelago is a top priority. Given the aspiration for increased vessel traffic we would like to see more information on how effective biosecurity measures will be introduced to ensure nonnative species are not inadvertently transported between islands.	Noted. These aspects will be addressed at feasibility stage/through the completion of a detailed Environmental Impact Assessment for each proposal.



Scottish Water

Comments	Response
In addition to associated domestic water and drainage requirements, several of the business opportunities identified in the Masterplan, such as water bunkering, hydrogen production, certain aquaculture activities etc. can be very water intensive. Furthermore, some activities, like fish processing, will also have a trade effluent discharge. In the locations identified, these demands may well be in excess of what is currently available.	Noted.
Should there be insufficient capacity at one of our works to accommodate the process element of a non-domestic development/new businesses, the developer would be required to provide the necessary funding to offer a solution which permits their development to be connected.	Noted and agreed. We would seek to engage with Scottish Water at pre-feasibility stage and these aspects would be considered during feasibility/EIA processes.
Given the importance of having this infrastructure in place to support future economic development of the harbour, we would recommend that Scottish Water be added to the list of Key Stakeholders.	Noted. As and when proposals are taken forward we would seek to engage more frequently with Scottish Water.
It may be necessary for the Developer to carry out further investigations on the network to ensure it can support the proposed development/new business without causing detriment to existing customers. Should mitigation be identified it will be the developer's responsibility to carry out these works. Again, this may be eligible for a financial contribution from Scottish Water under reasonable cost contributions rules.	Noted and agreed. We would seek to engage with Scottish Water at pre-feasibility stage and these aspects would be considered during feasibility/EIA processes.
Early engagement with Scottish Water is always encouraged, so the developer fully understands what capacity is available in the network or at our works, what studies or mitigation will be required, if there are any asset conflicts which need to resolved, and whether any of these aspects will impact on their proposed timescales. A Pre-Development Enquiry Form can be submitted at any time to assess if we are able to provide your development with water and/or drainage services.	Noted and agreed. We would seek to engage with Scottish Water at pre-feasibility stage.



Marine Scotland

Comments	Response
There are a number of projects which have works below Mean High Water Springs that will require a	Noted. As and when the proposals are taken
marine licence. Applicants should contact MS-LOT to discuss the marine licensing requirements of	forward we would seek to engage with
specific projects which may also require screening under the Marine Works (Environmental Impact	Marine Scotland on a regular basis.
Assessment) (SCOTLAND) Regulations 2017.	

Orkney Islands Council (Education, Leisure and Housing)

Comments	Response
The element of the plan which would impact the Museums and Heritage Service most significantly are	Noted.
the plans for Lyness as the proposed storage area is close by the Museum. Our feeling, from looking at	
the plans, is that this would improve the area and would not have a negative impact on the Museum at	
all.	



Community Councils

Area	Comments	Response
Eday	Eday Community Council would like to express disappointment that Eday and other isle communities around Orkney have not been included in Phase 1 masterplan. Whilst we understand that there will be a Phase 2 taking place in coming months, it is nonetheless disappointing that yet again the isle communities are considered last.	Phase 2 will commence in early 2020 (if not before) and there will be planned visits to each island community; all issues identified will be taken on board and dealt with during Phase 2.
Eday	Eday in particular, has pier infrastructure that is in very poor condition, as reported by the engineer from PBA who came to survey the infrastructure earlier this year. He expressed significant concern about the state of the fenders. The aquaculture company who utilises the infrastructure is almost at the point of refusing to use the pier on Eday given the safety implications that it brings. Should the aquaculture company move away from Eday this could be detrimental to what is a very fragile economy. It is practically impossible for any vessels including yachts to lie alongside given the lack of wave protection and issues with depth of water at the steps. The condition of the store, waiting room and toilets is incredibly poor.	
Eday	Whilst there is some understanding that the revenue generating projects need to be in place first, so that there is money available to spend on those piers and harbours that do not generate money, there is a need for the Council as a whole to support the funding of these piers and harbours not as a marine asset but as a social, economic and community asset that is hugely important for the sustainability and viability of our island communities – and perhaps this should be a focus from Economic Development as well as Harbours.	
Eday	Eday Community Council would like to have some assurance that Phase 2 will happen and that piers and harbours around our smaller island communities are considered in earnest not just as harbour infrastructure but as the key economic and social assets that they are.	



Community Councils

Area	Comments	Response
Holm	Scapa Deep Water Quay: we do have a concern with the road access to the Scapa deep water port which is currently shown as a tee junction on a quite fast part of the main road to Holm, which does not have good visibility. Given the potential nature of traffic to the site, perhaps 50 car movements at shift changes during large maintenance operations, cranes and lorry's needed for delivery and removal of smaller items etc we think that the current junction shown is unacceptable and we would object to it if presented as a planned project.	Noted. No detailed plans for junctions and access roads have been developed so far – only a very high-level illustration of the optimal shoreside location. If and when the proposal is taken forward, concrete options would be considered by the engineers and these
Holm	Scapa Deep Water Quay: when a financial case is made for the project I would assume that the project will need to be pursued as quickly as possible and one of the first elements will be construction of the road access. As such we would like much more detailed consideration of this to be undertaken in advance of any decision to advertise the possibility of construction of a Scapa Deep water port project to potential customers. In this way construction would be able to commence almost as soon as any deal was completed to provide the port facilities.	would be subject to a detailed feasibility study, EIA and associated traffic impact assessment, and public consultation – this would all take place before any proposal could be delivered.
Holm	Holm Community council met on Wednesday evening last week. We didn't have any particular comments to make on the general aspects of the master plan. Provided that the individual investments make economic sense then going ahead with them seams sensible for the economic wellbeing of Orkney.	Noted.



Community Councils

Area	Comments	Response
Sanday	Kirkwall Pier Signage: members would like signage on buildings in Kirkwall as there is nothing telling tourists there where the North Isles ferry terminal is.	The reconfiguration of Kirkwall Pier will include a review of signage, along with buildings, layout and traffic management.
Sanday	Kettletoft Pier: the ladders are restricting pier users where the ladders are offset rather than inset and boats cannot berth properly between them.	Phase 2 will commence in early 2020 (if not before) and there will be planned visits to each island community; all issues identified will be taken on board and dealt with during Phase 2.
Sanday	Kettletoft Pier: the large pier store door has been off for a while even though this has been reported.	
Sanday	It has been noticed over the past month that visiting yachts are having problems berthing at the mooring buoy at Kettletoft.	
Orphir	Specifically in Orphir though, it would be great to have a wee marina at Houton.	With regard to marine leisure and the 'sailing offer' in Orkney, the initial focus within Phase 1 of the masterplan is on Kirkwall and
Orphir	Initial thoughts are that this concentrates on development in the larger ports. No problem with that. However, as Marinas are mentioned I think it would have been good to see some ambition regarding marina developments in the small ports. For example small marinas in Houton, Tingwall, Birsay, Sanday, Stronsay, Shapinsay, Eday, Flotta, Hoy and others. These would spread visitors to the islands rather than concentrating them in the larger ports. This would also ease congestion, spread income around Orkney and provide some fantastic visitor experiences. Possibly something that development trusts would like to be involved with.	Stromness, given that these are the primary marinas in Orkney are both operating at capacity – all yachts visiting Orkney stay at one or other of these marinas during their trip. It is accepted that wider strategy is required encompassing the whole of Orkney to create a network of yacht moorings, landing places and pontoons as well as developing the services to support what is a growing sector. This strategy will be developed during Phase 2 and will build on that which is proposed in Phase 1. See Page 35.



Comments	Response
1.1 We would like to see consideration in the masterplan of the need for potential adaptation to mitigate possible climate change effects on the proposed infrastructure at all the sites it covers. Although climate change is referenced in the Strategic Environmental Assessment (SEA) the only mention of climate change in the plan is in relation to possible changes in Orkney's future fuel supply. Consideration also needs to be given to minimising greenhouse gas emissions and the Harbour Authority's carbon footprint as referenced in the SEA.	The masterplan has been updated to reflect the recent Climate Emergency declaration and revised carbon reduction targets for Scotland, along with a more detailed description of measures to support this policy. See Pages 11 – 17.
1.2 We would welcome reference in the plan to the Scottish Climate Change Adaptation Programme, which sets out Ministers objectives, policies and proposals to tackle the climate change impacts identified for Scotland. In addition the plan could also usefully reference work from the Marine Climate Change Impacts Partnership in relation to adaptation or climate smart working.	Noted. Reference has been made to the Scottish Climate Change Adaptation Programme, as well as cognisance of the UKMCC, as it could offer some excellent best practice examples in the field of harbour operations and infrastructure development. See Pages 11 – 17 and 88.
1.3 Reference to the programme could be added to the Key Policies and plans listed on page 17. The key consequences of climate change that are applicable to this plan identified and need to develop appropriate adaptation strategies. An outline requirement could be for example: adaptation to mitigate possible climate change effects on the proposed infrastructure.	The outline requirements were developed at an early stage in the masterplanning process to guide the appraisal and selection of preferred options for development. In our view it is not possible to revise these outline requirement post-appraisal. However, we feel that the amended section which covers climate change addresses comments adequately. Bearing in mind that the masterplan is a 'blueprint' there will be detailed EIAs undertaken for each proposal as they proceed and it is assumed that climate change impact will be



a key element within this, along with the identification of potential

mitigation measures.

Comments

- 1.4 We welcome the Mitigation and enhancement measures in the bulleted list on page 54 and example the requirement for a Flood Risk Assessment at the planning phase. There are other issues such as biosecurity that will also require to be addressed. As such we have also provided below and in attached Appendix 1 generic advice on marine related developments such as those covered in the masterplan to consider as the proposals progress through the Environmental Impact Assessment (EIA)/planning process. Biosecurity for example is covered in Section 3.3 of Appendix 1. It would be useful to add other assessments to this section of the plan that will be required in support of the proposals or individual aspects as per the example below (see also comments in section 4.5 below).
- 1.5 The proposals for Scapa Deep Water Quay include "Area excavated from steep hillside immediately behind new quay position. Rockfill created used to in infill quay and reclamation area, to provide cut/fill balance. Exact route of road from public road to site to be determined by local topography, consents and gradients required for vehicles movements" and a 5+ha laydown area.
- 1.6 The GIS layer Landcover Scotland 2015 shows heather and bog as well as grasslands within the area proposed for this development; there is the possibility for Groundwater Dependent Terrestrial Ecosystems to be present. This area will need to be surveyed according to our guidance LUPS-GU31.
- 1.7 In order to assess the potential risk to GWDTE a Phase 1 habitat survey should be provided both within and outwith the site boundary, within the following distances of development as a minimum: a) within 100m radius of all excavations less than 1m in depth; b) within 250m of all excavations deeper than 1m.
- 1.8 However, if it is suspected that there may be relevant habitats on site, a National Vegetation Classification (NVC) survey can be provided and/or if SNH have requested a NVC survey for all or part o the site then we would accept this information.

Response

Noted. Please see revised section on Environmental Considerations (Pages 63 – 68).

We would wish to engage with SEPA prior to commencement of feasibility, to ensure that all relevant aspects and issues are addressed and developed appropriately.

Following the completion of the masterplan an implementation plan as part of the Outline Business Case will be developed. We would seek input from SEPA with regard to identifying actions and timescales in relation to points raised.



Comments	Response
2.1 We have no site-specific flood risk advice on the draft plan other than to welcome the commitment in the plan for each development to be subject to a detailed Flood Risk Assessment. However we would take this opportunity to provide advice to assist as the proposals in the plan progress through planning.	Noted. Please see revised section on Environmental Considerations (Pages 63 – 68). We would wish to engage with SEPA prior to
2.4 For information the expected sea level rise for Orkney Islands is 0.93m by 2100 based on the latest UK climate change predictions reported in 2018. We would recommend that this allowance is taken into consideration to ensure that any development of the site is sustainable and to account for uncertainties and the effects of wave action.	commencement of feasibility, to ensure that all relevant aspects and issues are addressed and developed appropriately. Following the completion of the masterplan an
2.5 With regards to leisure development such as cafes, we would recommend a minimum freeboard of 600mm above the flood level is applied to finished floor levels.	implementation plan as part of the Outline Business Case will be developed. We would
2.6 It should be noted that, without further flood risk information, we would object to any proposals for overnight accommodation, or any development which falls within the 'Highly Vulnerable Uses' category or our Land Use Vulnerability Guidance.	seek input from SEPA with regard to identifying actions and timescales in relation to points raised.
3.1 The diversification into other industrial sectors through the ability to handle larger vessels brings with it the possibility that environmental permitting or licensing of associated infrastructure may be required e.g. silos for offshore Cement supply, new Fish effluent discharges, the boatyard repair, lift out and maintenance facility etc. There may also be an increase in the throughput capacity of existing units due to handling larger vessel, these may also require licensing if thresholds are met.	
3.2 It is recognised that at Hatston part of the proposal includes the construction and operation of a fuelling depot comprising 2 x 3,000 tonne bunded tanks. Such a facility would fall within COMAH as a Lower Tier establishment. Prior to construction and operation the Harbour Board / operator will need to contact the COMAH Competent Authority (CA) to discuss their needs. Similarly, any LNG/LPG bunkering hub/storage facility (e.g. that proposed for Flotta) is likely to be captured under the COMAH Regulations and require the production of a Pre-Construction Safety Report.	



Comments	Response
3.3 The report recognises that the development at Lyness will be on a brown field site. There have been previous discussions regarding the need for soil contamination investigation and remediation at this site that will need to be revisited as part of any development here.	Noted.
3.4 We welcome the commitment to produce a Construction Environmental Management Plan detailing how impacts on biodiversity, flora and fauna will be avoided/mitigated, and the mitigation and enhancement measures detailed on page 54. As previously noted the proposals include for example at Scapa Deep Water Quay a 5+ hectare laydown area. Please be advised that a Controlled Activities Regulations (CAR) construction site licence will be required for management of surface water run-off from a construction site, including access tracks, which: is more than 4 hectares; is in excess of 5km; or includes an area of more than 1 hectare or length of more than 500m on ground with a slope in excess of 25°.	Noted. Please see revised section on Environmental Considerations (Pages 63 – 68). We would wish to engage with SEPA prior to commencement of feasibility, to ensure that all relevant aspects and issues are addressed and developed appropriately. Following the completion of the masterplan an implementation plan as part of the Outline Business
3.5 Land reclamation: as the proposals progress we would like details (quantity, type, source) of appropriate infill material to demonstrate no waste material will be used for such proposals.	Case will be developed. We would seek input from SEPA with regard to identifying actions and timescales in relation to points raised.
4.1 We welcome the consideration of placemaking in the masterplan, for example to provide better facilities and reference to "After construction landscaping, re-vegetation and habitat enhancement should be undertaken in line with appropriate guidelines" and for waterfront development in Kirkwall to "Improve experience in terms of visual amenity/ sense of place".	



Comments/views	Response
4.2 We would welcome proposals to connect the harbours to the wider environment. Onshore transport could be considered further, i.e. connecting the proposed expanded harbours to the settlements and beyond. This could include vehicle transport, including sustainable transport options and other connection options such as cycle routes and walking paths for use by local residents and the cruise market.	The masterplan has been updated to reflect the recent Climate Emergency declaration and revised carbon reduction targets for Scotland, along with a more detailed description of measures to support this policy. See Pages 11 – 17. This context includes the potential future provision of sustainable transport options and connectivity with existing and future walk and cycle networks.
4.3 The plan references 52,000 cars travelled on the two Northlink services, delivery of fuel supply and lower carbon fuelling opportunities. Consideration should be given to travel modes in the future. For example installing electric charging points/hydrogen refuelling stations at the harbours.	The masterplan has been updated to consider climate change and decarbonisation. As part of this cognisance is given to the fact that the type of fuel currently used in the shipping industry is going to decarbonise over time; the masterplan proposals must therefore be futureproofed so that they can accommodate different types of fuelling systems in the medium to long term. See Pages 11 – 17.
4.4 Any opportunities to link the harbours to the wider environment through the creation/enhancement of green/blue infrastructure would be welcomed.	The following text has been added to the context regarding climate change: many of the masterplan proposals will have a positive impact on visual amenity, through improvements to layouts, traffic flows and removing conflict between different operational activities. There will be other opportunities to enhance the environment, particularly through the creation of green infrastructure; this might be plants or shrubs positioned to aid vehicular or pedestrian traffic management; or using plants to make particular spaces more attractive.



Comments/views

4.5 We welcome the reference in the SEA to "Undertake Water Framework Directive (WFD) Assessment for all developments". Although this requirement does not appear to be detailed in the plan. We recommend that the plan is cross referenced with the SEA (Table 5-1) and all such assessment and mitigation are detailed in Section 5 Environmental Considerations of the Plan. This could be done by amending the existing Mitigation and enhancement measures section by splitting the information detailed in this into two sections. Firstly required assessments/surveys such as FRA etc which are required pre commencement of works/to inform the proposals. The second section mitigation and enhancement measures to offset impact.

4.6 With regard to the River Basin Management Plan and example the Kirkwall coastal water body (ID: 200234), this water body is already classified as "Good". However there are various proposals outlined in the plan including land reclamation that will have an impact of the morphological classification of the relevant waterbody. This should be given consideration at the EIA stage to ensure there is sufficient capacity in the receiving environment to prevent a deterioration. We can provide further waterbody specific advice as the proposals progress to assist.

Response

Noted. Please see revised section on Environmental Considerations (Pages 63 – 68).

We would wish to engage with SEPA prior to commencement of feasibility, to ensure that all relevant aspects and issues are addressed and developed appropriately.

Following the completion of the masterplan an implementation plan as part of the Outline Business Case will be developed. We would seek input from SEPA with regard to identifying actions and timescales in relation to points raised.



any impacts.

Response Comment Part 1. There is potential for some of the proposals to have impacts on the Once the masterplan has been finalised and approved it is historic environment and we therefore recommend early consultation and envisaged that there will be some prioritisation and identification of timescales for moving proposals forward. Once this has been engagement to identify potential impacts and relevant mitigation at the earliest stage. achieved we would seek engagement with HES, if possible prior to the commencement of feasibility so that we can indeed identify potential impacts and relevant mitigation at the earliest stage. 2.6 Outline requirements and objectives The masterplan objectives and outline requirements were defined It might perhaps be more aspirational to consider safeguarding and at an early stage in the masterplanning process to guide the supporting the coastal and marine environment as a whole rather than just appraisal and selection of preferred options in terms of productivity (in reference to the environmental objective). infrastructure proposals. Unfortunately it is not possible to revise We consider that the historic environment can help to support sustainable these or retrofit them, as the appraisal process has already been undertaken and the preferred options selected. As and when the places and activities and can be reflected in both the socio-economic and environment objectives of the Masterplan. It is widely recognised that the projects are taken forward we understand that the EIA will address sense of place and strong cultural identity provided by the historic the impact on the historic environment, as well as identify the environment plays a crucial part in the sustainability of communities, as well opportunities associated with the historic environment and the as benefitting the economy and tourism. The outline requirements could more role that it plays. clearly demonstrate the environmental objectives of the Masterplan. Noted and agreed. As and when the proposals proceed we would 3 – masterplan proposals Comment: we consider that some of the proposals may have the potential to envisaged consultation with HES to further develop the approaches have impacts on unknown or undesignated marine historic environment and surveys outlined in the comments. We would envisage early assets and therefore mitigation may be required. We would therefore engagement with HES, prior to the commencement of feasibility. An recommend that early consultation is undertaken on individual proposals to implementation plan will shortly be developed for each of the allow for adequate survey and design options to be put in place to mitigate proposals as part of the Outline Business Case and we would seek



to discuss this in detail with HES over the coming weeks to

prior to and during feasibility and the timescales for these.

determine what further survey and analyses activities are required

Comment

Kirkwall – the harbour at Kirkwall is category B listed and the improvements to the fish landing area in the basin may therefore require listed building consent; we recommend consultation with the planning department regarding this issue.

We note that dredging is proposed to allow berthing of larger vessels to the additional multipurpose quay infrastructure. Dredging has the potential to damage or destroy marine historic environment assets such as wrecks and a survey of this area and the areas proposed for reclamation may be required along with further mitigation if assets are identified.

In addition the proposed changes to the quayside will alter the setting of the B listed harbour and C listed harbour light as well as the conservation area and consultation with the Council conservation advisor should be undertaken. We note that some elements of the harbour fall within the conservation area so any potential demolition of buildings within this area may require conservation area consent.

Hatston pier and terminal – as with Kirkwall there is the potential for reclamation works to damage or destroy unknown or undesignated marine historic environment assets. A survey to identify potential assets may be required and further mitigation if assets are identified.

Scapa Pier – as above, the dredging and reclamation in this area has the potential to damage or destroy any unknown or undesignated marine historic environment assets in the area. Survey of this area may be required and further mitigation if assets are identified.

Stromness and Copland's Dock – we note that the area identified for the traffic management review and review of infrastructure is located within the conservation area and consultation with the Council conservation advisor is recommended. As above, the reclamation in this area has the potential to damage or destroy any unknown or undesignated marine historic environment assets in the area. Survey of this area may be required and further mitigation if assets are identified.

Response

Noted and agreed. As and when the proposals proceed we would envisage consultation with HES to further develop the approaches and surveys outlined in the comments. We would envisage early engagement with HES, prior to the commencement of feasibility.



Comment	Response	
Scapa Deep Water Quay – the current plan does not appear to indicate that dredging will be required, however the limited area for reclamation may require further survey at project stage as noted above.	Noted and agreed. As and when the proposals proceed we would envisaged consultation with HES to further develop the approaches	
Lyness – we note that the areas of hardstanding are proposed in the vicinity of category A listed structures, however we are content that the proposals are unlikely to have significant effects on the setting of these assets.	and surveys outlined in the comments. We would envisage early engagement with HES, prior to the commencement of feasibility.	
Section 5 – Environmental considerations We welcome that an SEA objective for cultural heritage has been included, however as noted in our scoping response we consider that a more positive objective could have been used. We have provided more detailed comments on the SEA in annex 2, however we note that only potential negative effects have been identified by the masterplan	Noted. At plan level the negative effects have been identified so as to identify suitable mitigation measures. At project level we will consider inclusion of positive objectives and how positive impacts could be achieved.	
Section 6 – Management and commercial considerations	Noted.	
We welcome that we have been identified as a key stakeholder in the process going forward and that ongoing engagement with stakeholders is proposed. As noted above we recommend that further consultation on individual proposals is undertaken at an early stage to ensure appropriate mitigation for the historic environment is achieved.		
Appendix C – Proposed development policy principles	Noted.	
We note that this Masterplan only covers up to 2040 and that there is a the potential that there may be longer term requirements for more harbour structure around Scapa Flow including around Flotta. We would like to note that there is the potential for a Historic Marine Protected Area (HMPA) to be designated within Scapa Flow and that this should be taken into consideration when identifying future potential proposals.		



Comment	Degrange
Comment	Response
We appreciate that the specific details of the various proposals described in the Masterplan will become apparent later on in the process. However, at this stage it is clear that the scale, location and nature of the developments may result in disturbance to important species and habitats in the area and also may have significant landscape implications. Therefore, we recommend early consultation on the individual projects to identify potential issues and mitigation as early as possible.	Noted and agreed. An implementation plan will shortly be developed for each of the proposals as part of the Outline Business Case and we would seek to discuss this in detail with HES over the coming weeks to determine what further survey and analyses activities are required prior to and during feasibility and the timescales for these.
2.5.2 Fit with Key Policies and Plans: The plan has been developed in cognisance of key national, regional and local plans and policies. However, the context provided for the National Marine Plan at Appendix A is at a high level and only a subset of the NMP guiding principles are included in the consideration of fit with the draft Masterplan. It may be useful to take account of all General Policies in making a comparison of fit with the draft masterplan.	A more detailed summary has been provided at Appendix C. In our view it is not beneficial to create an additional table showing how each of the proposals fit with each of the 20 or so planning policy principles, as this does not tell us anything more than what is already presented. Specific areas where there is significant fit or clearly not with such policies will be made clear during the planning and feasibility processes at project level.
2.6 Outline requirements and Objectives: The Environment objective within the draft Masterplan is to 'safeguard and support the long-term productivity of the coastal and marine environment though best practice and strong environmental stewardship'. This objective could be more aspirational, for example through reflecting the principals of enhancement of the health of the marina area and net environmental gain. The plan could also be bolder in relation to climate change, particularly in light of the climate emergency which is now widely acknowledged. We recommend that the plan considers ways to mitigate for and adapt to climate change, which could include consideration of specific policies / approaches for opportunities for protection of ecosystem services, and ensuring contingency within the plan for adaption to the effects of climate change.	The masterplan has been updated to reflect the emerging policies on climate change. As part of this there are thematic measures now included which focus on harnessing lower emission transport and fuel options in the future; further amendment has been made with regard to identifying opportunities for environmental enhancement. In terms of ensuring contingency within the plan for adaptation to the effects of climate change, the masterplan is a live document so to speak, so when it is reviewed and updated (which will likely be on a three-year basis) any emerging factors can be incorporated. See amendments on pages 11 – 17.



SNH - comments on the Orkney Harbour Draft Masterplan Phase 1

Comment	Response
2.6 Outline requirements and Objectives: A series of outline requirements to help enable delivery of the plan objectives is included in this section of the plan. However, environmental themes are not very clearly carried through to the list.	The outline requirements were originally defined as part of the masterplanning process to guide the appraisal and selection of preferred options. It is not possible to change these now unfortunately; however, there are new sections regarding climate change including a range of thematic measures that will be applied to proposals as and when they are developed and delivered.
Masterplan Proposals: We appreciate that the specific details of the various proposals described in the Masterplan will become apparent later on in the process. However, at this stage it is clear that the scale, location and nature of the developments may result in disturbance to important species and habitats in the area and also may have significant landscape implications. Although we have highlighted some of these our response to the Environmental Report, detailed in Annex 1, we would recommend early consultation on the individual projects to identify potential issues and appropriate mitigation as early as possible.	Noted. It is envisaged that we will engage with SNH shortly, particularly to develop the implementation plan and requirements for each proposal with respect to environmental assessment and considerations.
Appendix C Proposed Development Policy Principles: A series of proposed development policy principles to safeguard particular geographic areas from other types of development/activities are outlined in Appendix C. The Orkney Islands Regional Marine Planning process should be a useful and transparent mechanism to discuss and develop these polices. Therefore, it would be good for these proposals to remain as draft until the Regional Marine Planning process has concluded.	Noted.

