

## Orkney Islands Regional Marine Plan – Consultation Draft

### Overview

#### General Comments

Scottish Water broadly supports the aims and purpose of the Orkney Islands Regional Marine Plan.

### Detailed Response

#### Specific Comments

Scottish Water plays a key role in the life and prosperity of all the people of Scotland. Through our core business of providing water and wastewater services to our customers Scottish Water is integral to maintaining public health, the protection of the environment and to the development of a more sustainable Scotland. We therefore support the ambition that Orkney’s coastal and marine environment needs to be carefully managed and protected to ensure it is clean, healthy, safe and productive.

1.	<b>Do you have any comments on the purpose of the Orkney Islands Regional Marine Plan (1.1 - 1.4)?</b>
<p>Scottish Water understands that the Orkney Islands Regional Marine Plan has been prepared to guide decision making in Orkney’s marine environment, in accordance with the general policies of the National Marine Plan. We are aware that work to review the National Marine Plan is currently ongoing but expect the purpose and framework of each Regional Marine Plan to remain consistent.</p>	
2.	<b>Do you have any comments on how to use the Plan policy framework (1.5 to 1.14)?</b>
<p>No comments</p>	
3.	<b>Do you have any comments on vision, guiding principles, aim and objectives (1.15, 1.16 and Table 2)?</b>
<p>No comments</p>	
4.	<b>Do you have any comments on the introductory information to the General Policies (2.1 – 2.16)?</b>
<p>No comments</p>	
5.	<b>Do you have any comments on General Policy 1: Sustainable development, activities, and use?</b>

Scottish Water agrees with the importance of encouraging, promoting and facilitating sustainable development within the marine environment. We also welcome the inclusion of the plan's integrated approach to land-use and marine planning as we operate on both onshore and offshore environments.

**6. Do you have any comments on General Policy 2: Safety?**

No comments

**7. Do you have any comments on General Policy 3: Climate change?**

Scottish water agrees with the need to recognise climate change as a critical factor affecting Scotland's marine environment. Our Climate Change Adaptation Plan shows how we will broadly address this and adapt our assets to ensure they remain reliable and sustainable: [Scottish Water Climate Change Adaptation Plan](#).

**8. Do you have any comments on General Policy 4: Supporting sustainable social and economic benefits?**

No comments

**9. Do you have any comments on General Policy 5: Safeguarding natural capital and ecosystem services?**

No comments

**10. Do you have any comments on General Policy 6: Water environment?**

We acknowledge that the aims of the plan are consistent with the aims of Scotland's River Basin Management Plan (RBMP) in that they act to protect the water environment and avoid deteriorate in status. To help enable the aims of RBMP (3<sup>rd</sup> cycle), Scottish Water has created an [Improving Urban Waters Routemap](#). This is updated annually to show our progress on delivering our commitments set out in the RBMP.

Alongside providing vital drinking water for customers across Orkney Islands, Scottish Water also operates wastewater treatment infrastructure across Orkney Islands, which are vital in maintaining public health. Wastewater treatment works discharge treated effluent by outfalls to inland watercourses and coastal waters. All discharges to the water environment are licensed by SEPA under the Water Environment (Controlled Activities) Scotland Regulations.

Scottish Water questions the accuracy of map No.4. Whilst the map is indicative of wastewater treatment locations, it is inconsistent with our record of public infrastructure. Scottish Water can provide up to date information on public wastewater treatment assets so that the map can accurately depict these alongside the private wastewater treatment assets.

**11. Do you have any comments on General Policy 7: Coastal development and coastal change?**

Scottish Water welcomes the inclusion of coastal development and coastal changes within this plan. We would like to highlight the need to protect assets from the impacts of climate change, particularly in coastal environments, to ensure that the integrity of wastewater and water assets can remain fully operational. This will contribute to the resilience of coastal and island communities; help avoid pollution and maintain status of coastal and marine environments.

Scottish Water also supports the need to protect the land from flooding, as outlined in the Orkney Local Flood Risk Management Plan. Scottish Water helps to protect homes from flooding caused by sewers either overflowing or becoming blocked.

12.	<b>Do you have any comments on General Policy 8: Historic environment?</b>
No comments	
13.	<b>Do you have any comments on General Policy 9: Nature?</b>
No comments	
13.a	<b>Do you think General Policy 9d should include specific policy provisions on how lower magnitude impacts on Priority Marine Features (i.e. those impacts that do not constitute an impact on the national status) should be considered in decision making?</b>
No comments	
14.	<b>Do you have any comments on General Policy 10: Seascape and landscape?</b>
No comments	
15.	<b>Do you have any comments on General Policy 11: Surface and underwater noise, and vibration?</b>
No comments	
16.	<b>Do you have any comments on General Policy 12: Marine litter and waste?</b>
<p>Scottish Water welcomes the inclusion of marine litter and waste within the plan. The impacts of inappropriately flushed items can often be seen in the sewer network since these items can block sewers and contribute to Sewage Related Debris (SRD) problems in rivers and coastlines. Our <a href="#">Nature Calls</a> campaign looks to influence customer behaviour to reduce the inappropriate disposal of items via the toilet.</p>	
17.	<b>Do you have any comments on General Policy 13: Non-native and invasive non-native species?</b>
No comments	
18.	<b>Do you have any comments on General Policy 14: Amenity, wellbeing and quality of life of local communities?</b>

No comments	
19.	<b>Do you have any comments on the introductory information to the Sector Policies (3.1 – 3.16)?</b>
No comments.	
20.	<b>Do you have any comments on Sector Policy 1: Commercial fishing?</b>
No comments	
21.	<b>Do you have any comments on Sector Policy 2: Aquaculture?</b>
No comments	
22.	<b>Do you have any comments on Sector Policy 3: Shipping, ports, harbours and ferries?</b>
No comments	
23.	<b>Do you have any comments on Sector Policy 4: Pipeline, electricity and telecommunications infrastructure?</b>
<p>Scottish Water welcomes the inclusion of pipeline infrastructure in this plan.</p> <p>Pipeline infrastructures are fundamental to the Scottish Water's operations in Orkney with island communities where drinking water is supplied via subsea pipelines. Additionally, wastewater treatment facilities discharge wastewater via outfall pipes into the marine environment. Treated and storm wastewater is discharged to the marine environment under licence and the assets e.g., outfalls, including long sea outfalls, must be built, inspected, managed, and operated to protect the environment.</p> <p>These pipelines are essential for public health and so must be considered in such a way that protects them from the activities of other marine environment users.</p>	
24.	<b>Do you have any comments on Sector Policy 5: Offshore wind, wave and tidal renewable energy generation?</b>
No comments.	
25.	<b>Do you have any comments on Sector Policy 6: Zero carbon fuels, and oil and gas transition?</b>
No comments.	
26.	<b>Do you have any comments on Sector Policy 7: Tourism, recreation, leisure and sport?</b>
No comments.	

27.	<b>Do you have any comments on Section 4: Monitoring, Evaluation and Review of the Plan?</b>
No comments.	
28.	<b>Do you have any comments on Appendix 1: Licensing and Consenting Decisions?</b>
No comments.	
29.	<b>Do you have any comments on Appendix 2: Relevant Legislation, Plans, Strategies and Policies?</b>
No comments	
30.	<b>Do you have any comments on Appendix 3: National Marine Plan interactive?</b>
No comments	
31.	<b>Do you have any comments on Appendix 4: Natural Capital and Marine Ecosystem Services?</b>
No comments	
32.	<b>Do you have any comments on Appendix 5: Priority Marine Features?</b>
No comments	
33.	<b>Do you have any comments on Appendix 6: Seaweed Harvesting?</b>
No comments	
34.	<b>Do you have any comments on Appendix 7: Definition of Key Concepts, Acronyms and Glossary?</b>
No comments	
35.	<b>Do you have any comments on the Strategic Environment Assessment?</b>
No comments	
36.	<b>Do you have any comments on the Children's Rights and Wellbeing Screening Sheet and Impact Assessment (CRWIA)?</b>
No comments	
37.	<b>Do you have any comments on the Island Communities Impact Assessment (ICIA)?</b>
No comments	

38.	<b>Do you have any comments on the Equality Impact Assessment (EqIA)?</b>
No comments	
39.	<b>Do you have any comments on the Habitat Regulations Appraisal (HRA)?</b>
No comments	
40.	<b>Do you have any comments on the Business and Regulatory Impact Assessment (BRIA)?</b>
No comments	
41.	<b>Do you have any other comments or feedback you would like to provide?</b>
No comments	

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