

Written submission from the Royal Yachting Association Scotland

To the Rural Affairs, Climate Change and Environment Committee.

The Royal Yachting Association Scotland welcomes the publication of the draft National Marine Plan and recognises the considerable work that has gone into it. Having read the plan on behalf of RYA Scotland, I can see that our submissions have been taken account of and that the contribution of recreational boating and marine tourism to the economy as well as their less tangible contributions to wellbeing have been recognised. This letter provides additional evidence that I hope will be useful in finalising the plan. Some things have changed since the RYA Scotland submission was written. There are also a number of places where additional contextual material may be useful to avoid ambiguity and to clarify issues.

The present submission has been written on behalf of RYA Scotland. However, I should also mention that my thinking has been influenced by my membership of committees including the Advisory Group for the Pentland Firth and Orkney Waters Pilot Marine Spatial Plan, and the Management Committee of Forth Estuary Forum, as well as being a regular attendee at the Cross Party group on Recreational Boating and Marine Tourism. RYA Scotland is a non-statutory consultee of Marine Scotland.

For convenience, the comments below are listed in order of the sections to which they refer.

4.24 Historic assets include harbours many of which are classed as Listed Buildings. The biggest risk to them, particularly those on the east coast, is probably from storm damage. Harbours evolve over time in response to changes in technology and business environment and a good way to protect them and their heritage is to encourage them to be used for new purposes while supporting existing ventures. These points are consistent with Sections 12.9 and 13.20. It may also be worth noting that Scotland's marine heritage includes traditional boatbuilding as well as the skills involved in sailing traditional boats. The Scottish Coastal Rowing Project (<http://scottishcoastalrowing.org/>) shows the benefits to coastal communities that can be gained from building on that heritage. Moreover, several vessels based in Scottish harbours are on the National Register of Historic Vessels (<http://www.nationalhistoricships.org.uk/pages/about-the-registers.html>). Thus historic assets are rather more than sites.

6.31 is correct but it would be good to insert the words 'poorly marked' before 'creel gear' to take account of the actions taken by the creel fishing sector to minimise adverse impacts on recreational sailors. Recreational sailors have a duty to keep a watch but poorly marked creel buoys can be very difficult to spot, particularly in poor weather.

7.3 RYA Scotland is one of the interested parties and we try to respond to all marine fish farming applications using our network of locally based coastwatchers. We rarely object to applications as well-sited schemes are compatible with recreational boating and we recognise the importance of fish farming for local economies. However, we are sometimes able to suggest how minor changes can be made to plans to minimise potential conflict. Pre-application consultation with ourselves would be welcomed and could help speed up the licensing process. The RYA has published a

position paper on aquaculture (<http://www.rya.org.uk/infoadvice/planningenvironment/Pages/Aquaculture.aspx>) with the aim of demonstrating how marine aquaculture in all its forms can co-exist with recreational boating, ideally to the benefit of both sides.

Similarly in section 7.18, good planning and design can reduce competition to a minimum. In any case, the move of the industry to fewer but larger fish farms in places with a stronger tidal flow has helped reduce competition. An issue that is not mentioned is the removal of derelict fishfarm cages and associated gear when the owning company has entered into liquidation, as these can be a hazard to navigation. Up till now this is something that was done by the Crown Estate. However, it is unclear where the responsibility will lie if the Crown Estate revenues are assigned to Local Authorities as proposed by the Smith Commission.

12.3 The areas listed for sailing are those most used for cruising. However, the east coast is very important for passage making to Orkney and Shetland and through the Pentland Firth, the Caledonian Canal or the Forth and Clyde Canal to the other listed cruising grounds. Section 12.7 hints at this. The Outer Isles are becoming increasingly important, particularly for visitors from Continental Europe.

12.10 Like aquaculture, marine tourism can generate employment and income for remote areas. There are several good examples of facilities developed and managed by local communities such as at Lochaline and Lochmaddy.

12.12 The Argyll Sea Kayak Trail (<http://www.paddleargyll.org.uk/kayaktrail.html>) from Oban to Helensburgh shows what can be done with relatively little investment.

12.16 Island based events such as Hebcelt and Feis Bharraigh also attract visitors by sea.

12.25 This section is open to misinterpretation. The interaction between all vessels at sea is governed by the International Regulations for the Prevention of Collisions at Sea, known familiarly as the ColRegs. These form an important part of the training programmes for recreational sailors. There are few formal shipping lanes except where constrained by buoyage. Commercial vessels generally choose the shortest route to minimise fuel consumption. As in the Highway Code, no priority is given to vessels on the basis of size except in the Traffic Separation Schemes in the North Channel and the Little Minch and in designated narrow channels. Clyde Ports and Forth Ports both publish helpful guidance to recreational boaters to minimise interactions with commercial shipping. In Environmental Impact Assessments for marine developments recreational boating is included in the navigation section.

12.28 This is true whether the visitor comes by land or by sea. This apparent unspoiled nature of northwest Scotland and the islands is an important attraction for visiting sailors as can be seen in advertising material.

12.31 It is unclear why pontoons have been singled out for particular mention in relation to Invasive Non-Native Species as pontoons are static and can be taken out of the water for maintenance. Reference 51 is a very useful document for minimising risk from developments or events. However, applying the methodology in the publication shows that bigger risks come from the long distance movement of

workboats and construction barges. The RYA has for many years provided advice for minimising the environmental impact of recreational boating through its joint Green Blue programme with the British Marine Federation (<http://www.thegreenblue.org.uk/>). An abbreviated version of the advice appears on page four of the widely distributed free publication *Welcome Anchorages* (<http://www.welcome-anchorages.co.uk/>).

Finally, the Plan seems to make no reference to the continuing coordination of search and rescue assets or to anti-pollution measures. The wreck of the oil tanker Braer in 1993 demonstrated the risks. An oil pollution incident anywhere round the coast could have disastrous consequences. The annual *Operation Clearwater Forth* is an example of good practice in this respect.