

9 March 2019

Dear Sir,

Reference: Historic Marine Protection Areas Consultation

Thank you for the opportunity to comment on the proposed designation of some areas of Scapa Flow.

Orkney Renewable Energy Forum was set up in 2000 to seek to actively promote the preferential use of renewables over fossil fuels and has members whose interests span the community and the energy sector.

OREF is supportive of the protection of the environment, but objects to some of the areas suggested in the designation. The areas to which OREF objects are those of:

1. Blockships at Barriers 1– this is a prime site for tidal energy generation and needs to be preserved for this purpose. It is therefore important that the overzealous designation of the remaining blockships does not obstruct this important potential energy source at a later date.
2. Blockships at Barrier 2 – ditto

OREF would point out that it does not object to those at Barrier 3 being so designated as this site is too shallow for economic generation. OREF would point out, however, that the inevitable requirement to raise the Barriers as sea-levels begin to rise may make continued protection of the wrecks implausible. Your designation should be sensitive to the inevitable changing threats we will face.

3. The area south of the Barrel of Butter as this would impede a possible trans-Scapa Flow cable to run from Orphir to Flotta. This is presently being locally proposed in order to prevent the unnecessary erection of some 750 wooden poles which would encircle the east side of the Flow and intrude badly into the historic landscape. This is presently being discussed locally and is shown on the attached plan. It is not a plan that SSEN subscribe to yet, however the inadvertent sterilisation of a potential corridor across the flow should be avoided.

None of the sites mentioned above are associated with loss of life and all of the materials so placed were put there deliberately. They were therefore of marginal or zero value at the time of their placement and OREF would question whether their designation is appropriate in the light of the importance of tackling climate change and then need to secure future generation sites.

OREF would be happy to provide further information if that would be of use.

Yours Sincerely



On behalf of OREF

Enc: Extract of proposed cable route across Scapa Flow.