Written submission from Forth Ports Limited

Forth Ports welcome this opportunity to contribute to the Committee’s review of the final draft Scottish National Marine plan. We have been engaged in this process through the UK Major Ports Group and directly through the Marine Strategy Forum and predecessor bodies.

Forth Ports operate a group of ports on the east coast of central Scotland: Dundee, Methil, Burntisland, Kirkcaldy, Rosyth, Grangemouth and Leith. We are also the Competent Harbour Authority for the Firths of Forth and Tay, overseeing the safety of navigation.

We can see that many of the comments made by ourselves and others in the industry have been taken on board through the previous drafts of this plan. There are however a couple of points that we wish to draw to your attention:

- Map 3 – Marine Cultural Heritage Statutory Designations – It is unclear why so few of the designations have been listed. For example, under listed buildings there are only 4 presented; all lighthouses. There are many other listed coastal structures that have equal or higher listing status than the four listed. This could equally apply to some of the other headings in the map.

- 13.21 – it is noted that in creating facilities to support renewables, there may be a benefit to increase capacity for cruise liners. This appears a curious observation, as surely it increases capacity for any marine trade?

- In chapter 13 it would appear wise to emphasise further the need to protect commercial anchorages. We note these are not mapped on the NMPi, but clearly are on Admiralty Charts.

- In chapter 13 more emphasis should be placed on the critical importance of dredge spoil disposal sites, in particular the need to safeguard these as intrinsic to the safe operation of ports.

These observations are presented as constructive and we would welcome any request to expand upon or explain these points.