



Marine
Management
Organisation

Marine Plan Policy Assessment



...ambitious for our seas and coasts

Contents

- Marine Policy Statement and Marine Plans** 4
- Application form** 4
 - How does it work? 4
 - What will change for customers? 6
- What information must I provide?** 7
 - Marine plan policies 7
 - Additional plan and policy information..... 7
 - Marine plan policy consideration examples 7
- Annex I - Marine plan policies** 8
 - Access 8
 - S-ACC-1 8
 - S-ACC-2 8
 - Aggregates 8
 - S-AGG-1 8
 - S-AGG-3 8
 - S-AGG-4 9
 - Aquaculture 9
 - S-AQ-1 9
 - S-AQ-2 9
 - Biodiversity 10
 - S-BIO-1 10
 - S-BIO-2 10
 - S-BIO-3 10
 - S-BIO-4 11
 - Cables 11
 - S-CAB-1 12
 - S-CAB-2 12
 - Climate change 12
 - S-CC-1 12
 - S-CC-2 13
 - S-CC-3 14
 - S-CC-4 14
 - Co-existence 15
 - S-CO-1 15
 - Defence 15
 - S-DEF-1 15

Disturbance	15
S-DIST-1	15
Dredging & disposal	16
S-DD-1.....	16
S-DD-2.....	16
Employment	16
S-EMP-1.....	16
S-EMP-2.....	17
Fisheries.....	17
S-FISH-1	17
S-FISH-2.....	17
S-FISH-3.....	18
S-FISH-4	18
S-FISH-4-HER.....	18
Heritage assets.....	19
S-HER-1.....	19
Infrastructure	19
S-INF-1	19
Invasive non-native species	20
S-NIS-1.....	20
Knowledge, understanding, appreciation & enjoyment.....	20
S-SOC-1	20
Marine litter.....	21
S-ML-1	21
S-ML-2.....	21
Marine protected areas.....	22
S-MPA-1.....	22
S-MPA-2.....	22
S-MPA-3.....	23
S-MPA-4.....	24
Oil & gas.....	24
S-OG-1	24
Ports, harbours & shipping	24
S-PS-2.....	24
S-PS-3.....	25
Renewables.....	25
S-REN-1	25
Seascape & landscape.....	25

S-SCP-1	25
Tourism & recreation	26
S-TR-1	26
S-TR-2	26
Underwater noise	27
S-UWN-1	27
S-UWN-2	27
Water quality	28
S-WQ-1	28
S-WQ-2	28
Additional plan and policy information	28

Marine Policy Statement and Marine Plans

The UK Marine Policy Statement (MPS) provides the policy framework for the marine planning system. It provides the context for Marine Plans. Marine Plans, where they exist, put into practice the objectives for the marine environment that are identified in the MPS alongside the National Planning Policy Framework (NPPF) and the Localism Act 2011

A marine plan:

- sets out priorities and directions for future development within the plan area
- informs sustainable use of marine resources
- helps marine users understand the best locations for their activities, including where new developments may be appropriate

A marine plan also provides guidance on things to promote or avoid for some locations. They could also support an activity that is important to customers.

Each marine plan contains policies that guide those who use and regulate the marine area to encourage sustainable development while considering the environment, economy and society.

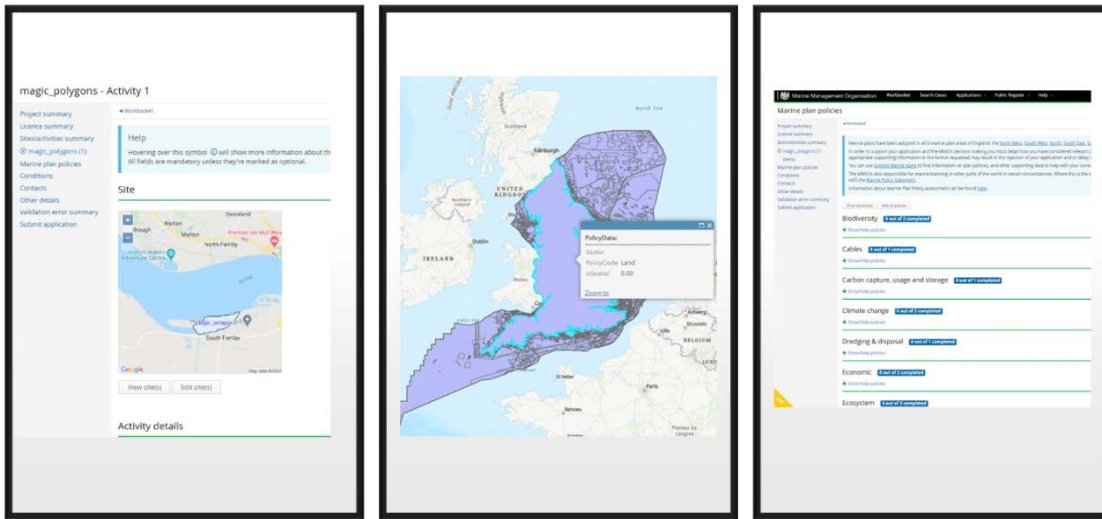
Marine Plans apply only in their area, but if a proposed activity may affect the plan area, this should be acknowledged and considered in the application and decision making.

Application form

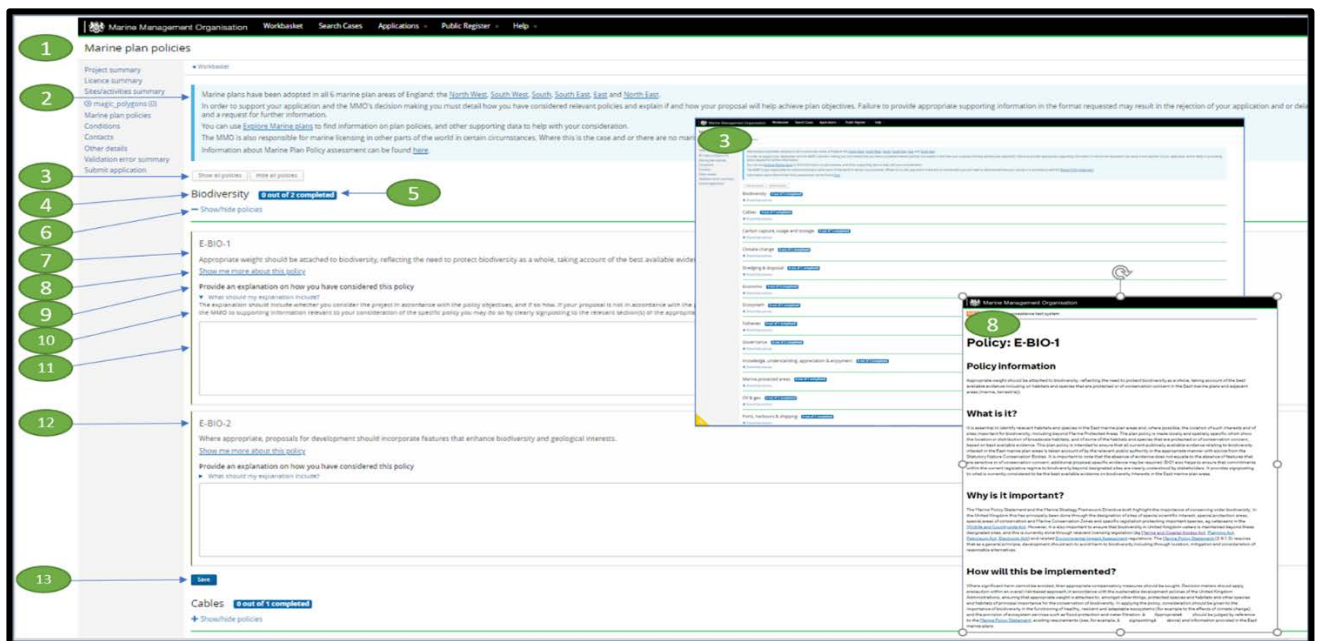
MMO has made enhancements to the marine licence application form to help customers easily understand which marine plan policies may be relevant to them and to make their application using a single system. The changes will enable customers to submit better quality information about their consideration of relevant policies in support their application.

How does it work?

New applications for a marine licence will include a dedicated marine plan policy screen. The screen uses site location data provided by the applicant to query an ArcGis marine plan policy layer displaying results in policy sector groupings in the new marine licence application form policy screen.



The new screen contains various features to improve the Applicant experience and facilitate the provision of marine plan policy information to support the application.
***Numbers correspond to the image:**



1. A new and dedicated marine plan policy page and left-hand menu tab
2. A blue banner at the top of the new marine plan policy section of the application form to set expectation and provide useful links.
3. Show all policies/hide all policies buttons. This feature allows the applicant to collapse and or reopen all policies in mass to suit preference.
4. Policies are categorised and grouped. The policy category in the image is 'Biodiversity'. Based on the location selected in this example there are two biodiversity policies relevant.

5. A flag is incorporated in the design to allow easy identification of incomplete sections.
6. Policies can be opened and hidden again on an individual basis. This can be used in combination with feature 3 to collapse all policies and help the applicant work through the screen systematically section by section.
7. The policy reference is shown along with the relevant policy text for ease of consideration.
8. A hyperlink 'Show me more about this policy' is included. The link opens a separate window and allows the Applicant to find out more about the policy in question.
9. A statement provides a prompt to Applicants directing them to explain how they have considered the specific policy.
10. The statement in 9 is supported by a space saving help text option 'what should my explanation include?'. When selected some more detailed narrative is provided:

'The explanation should include whether you consider the project in accordance with the policy objectives, and if so how. If your proposal is not in accordance with the policy, please explain why not and include any considerations you believe MMO should take into account when assessing your application.'

If you wish to direct the MMO to supporting information relevant to your consideration of the specific policy, you may do so by clearly signposting to the relevant section(s) of the appropriate document(s). You must still provide a summary setting out your policy considerations.'

11. A free text box is provided to allow customers to document their considerations as requested in 9 and 10.
12. Where a policy category has more than one policy that is relevant, each policy will be listed one after the other and ordered using the policy reference. In the example E-BIO-1 appears before E-BIO-2
13. A save feature is provided for customers to provide assurance and ensure information is not lost in error. When used the save button automatically closes the section being worked on and opens the next incomplete section. Text entered is also saved automatically when Applicants navigate to another part of the application form using the menu.

What will change for customers?

Customers making a new application will be provided with a list of policies deemed relevant to the proposal based on the site location(s) provided in the application. Each policy in the list will include policy text, a link to more information about the policy along with a prompt asking them to explain how they have considered the policy. Customers are provided with further help text to help them understand the kind of information that should be provided.

What information must I provide?

Marine plan policies

Relevant policies will be displayed within the marine plan policy section of the marine licence application form.

A policy reference for each relevant policy will be displayed along with the policy text. Customers must explain how they have considered the specific policy listed.

The explanation should include whether customers consider the project to be in accordance with the policy objectives, and if so how. If the proposal is not in accordance with the policy customers should explain why not and include any consideration they believe MMO should take into account when assessing the application.

If customers wish to direct the MMO to supporting information relevant to your consideration of the specific policy, they may do so by clearly signposting to the relevant section(s) of the appropriate document(s). Customers **must** still provide a summary setting out your policy considerations.

Additional plan and policy information

At the end of the list of relevant policies an additional section is provided for additional plan and policy information.

Customers are asked to provide any further information about their consideration of the Marine Policy Statement (MPS), marine plans and policy objectives they would like the MMO to take into account when determining the application.

If the proposal is not in accordance with marine plans or the MPS customers should use the section to explain why not and include any consideration they believe MMO should take into account when assessing the application.

Alternatively, if the proposed activities will take place in a location where there are no marine plans, the section should be used to explain how you have considered the [Marine Policy Statement \(MPS\)](#), indicating whether the project is in accordance with the MPS and if so how.

Marine plan policy consideration examples

Information provided in support of an application should be proportionate, that is the greater the scale of the proposal and potential for impact the more in depth the explanation will be expected to be.

To support customers, the MMO has produced Annex I. Annex I is illustrative of the structure and detail of considerations that should be provided in support of an application. The example is based on a relatively small scale theoretical coastal defence project. The site location used was deliberately wide to produce many policies that may not otherwise appeared.

It is important to note, the responses provided in Annex I are only intended to provoke thought about the type of considerations and information that might be provided, in a form that is likely to be most helpful. Customers must provide their own considerations bespoke to their proposed activities to support their application and must not reuse the information set out in the annex.

Failure to provide consideration of marine plan policies as described may result in rejection of the application.

Annex I - Marine plan policies

Access

S-ACC-1

Proposals, including in relation to tourism and recreation, should demonstrate that they will, in order of preference:

- a. avoid
- b. minimise
- c. mitigate significant adverse impacts on public access.

Provide an explanation on how you have considered this policy

The nature of the scheme is such that access to the site will be unchanged. The proposal is therefore considered to be in accordance with the S-ACC-1

The proposal will help achieve south marine plan Objective 6: To maintain and enhance inclusive public access to, and within, the south marine plan areas appropriate to its setting.

S-ACC-2

Proposals demonstrating enhanced public access to and within the marine area will be supported

Provide an explanation on how you have considered this policy

Public access to the site and wider marine area will be unchanged as a result of the scheme. The proposal is therefore S-ACC-1 is not considered to be applicable in this circumstance.

Aggregates

S-AGG-1

Proposals within an area subject to an Exploration and Option Agreement with The Crown Estate should not be supported unless it is demonstrated that the other development or activity is compatible with aggregate extraction.

Provide an explanation on how you have considered this policy

The scheme does not fall within an area subject to an Exploration and Option Agreement with The Crown Estate. S-AGG-1 is therefore not considered to be applicable to the proposal.

S-AGG-3

Proposals in areas where high potential aggregate resource occurs should demonstrate that they will, in order of preference:

- a. avoid
- b. minimise
- c. mitigate significant adverse impacts on aggregate extraction
- d. if it is not possible to mitigate significant adverse impacts, proposals should state the case for proceeding.

Provide an explanation on how you have considered this policy

The scheme does not fall within an area where high potential aggregate resource occurs. The works are not located in an area of extraction that would impede future operations to extract aggregate resource. S-AGG-3 is therefore not considered to be applicable to the proposal.

S-AGG-4

Where proposals require marine aggregates as part of their construction, preference should be given to using marine aggregates sourced from the south marine plan areas. If this is not appropriate, proposals should state why.

Provide an explanation on how you have considered this policy

Where marine aggregates are required they will be sourced from licenced offshore aggregates sites within the South Marine Plan area. The proposal is therefore considered to be in accordance with S-AGG-4

The proposal will help achieve south marine plan Objective 3: To support diversification of activities which improve socio-economic conditions in coastal communities.

Aquaculture

S-AQ-1

Proposals for sustainable aquaculture in identified areas of potential sustainable aquaculture production will be supported. Proposals in existing or within potential sustainable aquaculture production areas must demonstrate consideration of and compatibility with sustainable aquaculture production. Where compatibility is not possible, proposals must demonstrate that they will, in order of preference:

- a. avoid
- b. minimise
- c. mitigate significant adverse impacts on sustainable aquaculture
- d. if it is not possible to mitigate significant adverse impacts, proposals should state the case for proceeding.

Provide an explanation on how you have considered this policy

The scheme is not located within existing aquaculture production areas and will not prevent aquaculture opportunities in the future. S-AQ-1 is therefore not considered to be applicable.

S-AQ-2

Proposals that enable the provision of infrastructure for sustainable fisheries and aquaculture and related industries will be supported

Provide an explanation on how you have considered this policy

There is no change from the existing situation in this respect. The proposal does not enable or hinder the provision of infrastructure for sustainable fisheries and aquaculture or related industries and therefore S-AQ-2 is not considered to be applicable to the proposal.

Biodiversity

S-BIO-1

Proposals that may have significant adverse impacts on natural habitat and species adaptation, migration and connectivity must demonstrate that they will, in order of preference:

- a. avoid
- b. minimise
- c. mitigate significant adverse impacts

Provide an explanation on how you have considered this policy

The scheme will not have the significant effect on the natural habitat or species. Mitigation measures have been incorporated to avoid adverse impacts on marine habitats and species. Further information is available in the Marine Ecology and Ornithology sections of the EclA report and section 6 and 7 of the habitat regulation assessment. The proposal is in accordance with S-BIO-1.

The proposal will help achieve south marine plan Objective 12: To safeguard space for, and improve the quality of, the natural marine environment, including to enable continued provision of ecosystem goods and services, particularly in relation to coastal and seabed habitats, fisheries and cumulative impacts on highly mobile species.

S-BIO-2

Proposals that incorporate features that enhance or facilitate natural habitat and species adaptation, migration and connectivity will be supported.

Provide an explanation on how you have considered this policy

Vertipools will be installed on the existing sea wall. Research on vertipools has shown that both species diversity and biomass is significantly increased as a result of their installation (Hall, 2017).

See Section 6 of the Planning design and access document and Sections 5 and 7 of the EclA Report – Marine Ecology and Environmental Enhancements.

The proposal is considered to be in accordance with S- BIO-2.

The proposal will help achieve South Marine plan Objective 12: To safeguard space for, and improve the quality of, the natural marine environment, including to enable continued provision of ecosystem goods and services, particularly in relation to coastal and seabed habitats, fisheries and cumulative impacts on highly mobile species.

S-BIO-3

Proposals that enhance coastal habitats where important in their own right and/or for ecosystem functioning and provision of goods and services will be supported. Proposals must take account of the space required for coastal habitats where important in their own right and/or for ecosystem functioning and provision of goods and services and demonstrate that they will, in order of preference:

- a. avoid
- b. minimise

- c. mitigate for net loss of coastal habitat.

Provide an explanation on how you have considered this policy

Vertipools will be installed on the existing sea wall. Research on vertipools has shown that both species diversity and biomass is significantly increased as a result of their installation (Hall, 2017).

See Section 6 of the Planning design and access document and Sections 5 and 7 of the EclA Report – Marine Ecology and Environmental Enhancements.

The proposal is considered to be in accordance with S- BIO-3.

The proposal will help achieve South marine plan Objective 12: To safeguard space for, and improve the quality of, the natural marine environment, including to enable continued provision of ecosystem goods and services, particularly in relation to coastal and seabed habitats, fisheries and cumulative impacts on highly mobile species.

S-BIO-4

Proposals that enhance the distribution and net extent of priority habitats should be supported. Proposals must demonstrate that they will avoid reducing the distribution and net extent of priority habitats.

Provide an explanation on how you have considered this policy

Vertipools will be installed on the existing sea wall. Research on vertipools has shown that both species diversity and biomass is significantly increased as a result of their installation (Hall, 2017).

See Section 6 of the Planning design and access document and Sections 5 and 7 of the EclA Report – Marine Ecology and Environmental Enhancements.

The proposal is considered to be in accordance with S- BIO-4.

The proposal will help achieve south marine plan Objective 12: To safeguard space for, and improve the quality of, the natural marine environment, including to enable continued provision of ecosystem goods and services, particularly in relation to coastal and seabed habitats, fisheries and cumulative impacts on highly mobile species.

Cables

S-CAB-1

Preference should be given to proposals for cable installation where the method of installation is burial. Where burial is not achievable, decisions should take account of protection measures for the cable that may be proposed by the applicant. Where burial or protection measures are not appropriate, proposals should state the case for proceeding without those measures.

Provide an explanation on how you have considered this policy

There are no proposals for subsea cable installation as part of the scheme. S-CAB-1 is therefore considered to be not applicable to the proposal.

S-CAB-2

Proposals that have a significant adverse impact on new and existing landfall sites for subsea cables (telecoms, power and interconnectors) should demonstrate that they will, in order of preference:

- a. avoid
- b. minimise
- c. mitigate significant adverse impacts
- d. if it is not possible to mitigate significant adverse impacts, proposals should state the case for proceeding

Provide an explanation on how you have considered this policy

There are no existing or proposed landfall sites for subsea cables along the scheme frontage. The proposal will therefore not have any significant adverse impact on such infrastructure and as such it is considered that S-CAB-2 is not applicable.

Climate change

Proposals must consider their contribution to greenhouse gas emissions arising from unintended consequences on other activities. Where such consequences are likely to result in increased greenhouse gas emissions, proposals should demonstrate that they will, in order of preference:

- a. avoid
- b. minimise
- c. mitigate unintended consequences on other activities.

S-CC-1

Provide an explanation on how you have considered this policy

There will be no long-term impacts on greenhouse gases as a result of the new coastal defences. The proposal is considered to be in accordance with S-CC-1

The proposal will help achieve south marine plan Objective 7: To support the reduction of the environmental, social and economic impacts of climate change, through encouraging the implementation of mitigation and adaptation measures that:

- avoid proposals' indirect contributions to greenhouse gas emissions
- reduce vulnerability
- improve resilience to climate and coastal change
- consider habitats that provide related ecosystem services

S-CC-2

Proposals should demonstrate that for the lifetime of the proposal that:

1. they are resilient to the effects of climate change
2. they will not have a significant adverse impact upon climate change adaptation measures elsewhere.

In respect of 2. proposals should demonstrate that they will, in order of preference:

- a. avoid
- b. minimise
- c. mitigate the significant adverse impacts upon these climate change adaptation measures.

Provide an explanation on how you have considered this policy

The defence height of the scheme takes into consideration climate change and sea level rise over the next 50-years to ensure continued flood protection and avoid the need for additional capital works over this time period.

The scheme has been designed to ensure no impacts on adjacent areas and the potential for climate change adaptation measures elsewhere.

Further information is available in section 5 of the Planning design and assessment document submitted in support of the application.

The proposal is considered to be in accordance with S-CC-2.

The proposal will help achieve south marine plan Objective 7: To support the reduction of the environmental, social and economic impacts of climate change, through encouraging the implementation of mitigation and adaptation measures that:

- avoid proposals' indirect contributions to greenhouse gas emissions
- reduce vulnerability
- improve resilience to climate and coastal change
- consider habitats that provide related ecosystem services

S-CC-3

Proposals in the south marine plan area and adjacent marine plan areas that are likely to have a significant adverse impact on coastal change should not be supported.

Provide an explanation on how you have considered this policy

The scheme will not result in a significant adverse impact on coastal change. The Hold The Line (HTL) policy has been rigorously assessed and adopted at Shoreline Management Plan (SMP) and Strategy level, which this proposal delivers.

The proposal is considered to be in accordance with S-CC-3.

The proposal will help achieve south marine plan Objective 7: To support the reduction of the environmental, social and economic impacts of climate change, through encouraging the implementation of mitigation and adaptation measures that:

- avoid proposals' indirect contributions to greenhouse gas emissions
- reduce vulnerability
- improve resilience to climate and coastal change
- consider habitats that provide related ecosystem services

S-CC-4

Proposals that may have a significant adverse impact on habitats that provide a flood defence or carbon sequestration ecosystem service must demonstrate that they will, in order or preference:

- a. avoid
- b. minimise
- c. mitigate significant adverse impacts

Provide an explanation on how you have considered this policy

The proposed scheme will not cause significant adverse impact on habitats. Additional intertidal habitat will be created through the installation of vertipools. Further information is provided in section 9 summary conclusion section of the habitat regulation assessment provided in support of the application.

The proposal is considered to be in accordance with S-CC-4.

The proposal will help achieve south marine plan Objective 7: To support the reduction of the environmental, social and economic impacts of climate change, through encouraging the implementation of mitigation and adaptation measures that:

- avoid proposals' indirect contributions to greenhouse gas emissions
- reduce vulnerability
- improve resilience to climate and coastal change
- consider habitats that provide related ecosystem services

Co-existence

S-CO-1

Proposals will minimise their use of space and consider opportunities for co-existence with other activities

Provide an explanation on how you have considered this policy

The scheme makes appropriate use of space, with the footprint kept as minimal as possible. The scheme does not affect existing activities or sensitivities that already co-exist, for example nature conservation within the Lake. Further the scheme has been designed so that the wall is landward of the existing defence so there is no encroachment into the intertidal.

The proposal is therefore considered to be in accordance with S-CO-1

The proposal helps deliver south marine plan Objective 1: To encourage effective use of space to support existing, and future sustainable economic activity through co-existence, mitigation of conflicts and minimisation of development footprints.

Defence

S-DEF-1

Proposals in or affecting Ministry of Defence areas should only be authorised with agreement from the Ministry of Defence

Provide an explanation on how you have considered this policy

The scheme is located within the jurisdiction of Hudsport which is therefore a MoD area. QHM have confirmed that they do not have any concerns with the proposed scheme. A letter of confirmation is provided within the applications supporting documentation. Specifically Annex II of the PDF 'additional consents and approvals'.

The proposal is considered to be in accordance with S-DEF-1

The proposal helps deliver south marine plan Objective 1: To encourage effective use of space to support existing, and future sustainable economic activity through co-existence, mitigation of conflicts and minimisation of development footprints.

Disturbance

S-DIST-1

Proposals, including in relation to tourism and recreational activities, within and adjacent to the south marine plan areas must demonstrate that they will, in order of preference

- a. avoid
- b. minimise
- c. mitigate significant cumulative adverse physical disturbance or displacement impacts on highly mobile species.

Provide an explanation on how you have considered this policy

The proposal is a coastal defence scheme and is taking place within private grounds and will not impact tourism or recreations activities.

The proposal is considered to be in accordance with S-DIST-1

The proposal helps deliver south marine plan Objective 12: To safeguard space for, and improve the quality of, the natural marine environment, including to enable continued provision of ecosystem goods and services, particularly in relation to coastal and seabed habitats, fisheries and cumulative impacts on highly mobile species.

Dredging & disposal

S-DD-1

Proposals within or adjacent to licenced dredging and disposal areas should demonstrate that they will, in order of preference:

- a. avoid
- b. minimise
- c. mitigate significant adverse impacts on licenced dredging and disposal areas
- d. if it is not possible to mitigate significant adverse impacts, proposals should state the case for proceeding.

Provide an explanation on how you have considered this policy

The scheme is not located within or adjacent to any currently permitted / licensed dredging or disposal areas. The scheme is not expected to adversely impact any future dredging or disposal operations.

S-DD-1 is not considered to be applicable.

S-DD-2

Proposals must identify, where possible, alternative opportunities to minimise the use of dredged waste disposal sites by pursuing re-use opportunities through matching of spoil to suitable sites.

Provide an explanation on how you have considered this policy

The scheme will not involve the disposal of dredged material at sea and therefore S-DD-2 is not considered to be applicable.

Employment

S-EMP-1

Proposals that develop skills related to marine activities, particularly in line with local skills strategies, will be supported

Provide an explanation on how you have considered this policy

The scheme will employ and support the local construction workforce where possible. The proposal is therefore considered to be in accordance with S-EMP-1.

The proposal helps achieve south marine plan Objective 4: To support marine activities that increase or enhance employment opportunities at all skills levels among the workforce of coastal communities, particularly where they support existing or developing industries within the south marine plan areas.

S-EMP-2

Proposals resulting in a net increase to marine related employment will be supported, particularly where they are in line with the skills available in and adjacent to the south marine plan areas.

Provide an explanation on how you have considered this policy

The scheme is a relatively small and therefore will have negligible potential to increase marine related employment.

S-EMP-2 is therefore not considered to be applicable to the proposal.

Fisheries

S-FISH-1

Proposals that support the diversification of a sustainable fishing industry and or enhance fishing industry resilience to the effects of climate change should be supported

Provide an explanation on how you have considered this policy

The scheme does not support or hinder the diversification of a sustainable fishing industry and / or enhance fishing industry resilience to the effects of climate change.

S-FISH-1 is therefore not considered to be applicable to the proposal.

S-FISH-2

Proposals that may have significant adverse impacts on access to, or within, sustainable fishing or aquaculture sites must demonstrate that they will, in order of preference:

- a. avoid
- b. minimise
- c. mitigate significant adverse impacts
- d. if it is not possible to mitigate the significant adverse impacts, proposals should state the case for proceeding.

Provide an explanation on how you have considered this policy

The scheme is not located close to fishing or aquaculture sites and is not considered to have the potential to have an adverse impact in the manner described.

S-FISH-2 is therefore not considered to be applicable to the proposal.

S-FISH-3

Proposals that enhance access to, or within sustainable fishing or aquaculture sites should be supported.

Provide an explanation on how you have considered this policy

The scheme is not located close to fishing or aquaculture sites. The proposal will not enhance access to, or within sustainable fishing or aquaculture sites.

S-FISH-3 is therefore not considered to be applicable to the proposal.

S-FISH-4

Proposals that enhance essential fish habitat, including spawning, nursery and feeding grounds, and migratory routes should be supported. Proposals must demonstrate that they will, in order of preference:

- a. avoid
- b. minimise
- c. mitigate significant adverse impact on essential fish habitat, including, spawning, nursery, feeding grounds and migration routes.

Provide an explanation on how you have considered this policy

The scheme will not enhance essential fish habitat, including spawning, nursery and feeding grounds, and migratory routes. Equally, the scheme will not impact adjacent fish spawning, nursery, feeding grounds or migration routes.

The proposal is considered to be in accordance with S- FISH-4.

The proposal will help achieve south marine plan Objective 12: To safeguard space for, and improve the quality of, the natural marine environment, including to enable continued provision of ecosystem goods and services, particularly in relation to coastal and seabed habitats, fisheries and

S-FISH-4-HER

Proposals will consider herring spawning mitigation in the area highlighted on figure 26 during the period 01 November to the last day of February annually.

Provide an explanation on how you have considered this policy

The scheme is not located within an area of herring spawning. All foreshore works will be completed between April and September to avoid the sensitive bird over-wintering period, which will also mean avoiding the herring spawning season in Nov-Feb.

The proposal is considered to be in accordance with S-FISH-4-HER.

The proposal will help achieve south marine plan Objective 12: To safeguard space for, and improve the quality of, the natural marine environment, including to enable continued provision of ecosystem goods and services, particularly in relation to coastal and seabed habitats, fisheries and cumulative impacts on highly mobile species.

Heritage assets

S-HER-1

Proposals that may compromise or harm elements contributing to the significance of heritage assets should demonstrate that they will, in order of preference:

- a. avoid
- b. minimise
- c. mitigate compromise or harm If it is not possible to mitigate, the public benefits for proceeding with the proposal must outweigh the compromise or harm to the heritage asset

Provide an explanation on how you have considered this policy

The scheme design was changed from a set-back sheet piled wall to a set-back gravity reinforced concrete wall, in part to avoid any impacts on unknown buried archaeology.

The proposal is considered to be in accordance with S-HER-1.

The proposal will help achieve south marine plan Objective 8: To identify and conserve heritage assets that are significant to the historic environment of the south marine plan areas.

Infrastructure

S-INF-1

Appropriate land-based infrastructure which facilitates marine activity (and vice versa) should be supported

Provide an explanation on how you have considered this policy

The scheme will not involve development of or change to land-based infrastructure that facilitates marine activity (or vice versa) and as such S-INF-1 is not considered to be applicable to the proposal

Invasive non-native species

S-NIS-1

Proposals must put in place appropriate measures to avoid or minimise significant adverse impacts on the marine area that would arise through the introduction and transport of non-indigenous species, particularly when:

1. moving equipment, boats or livestock (for example fish and shellfish) from one water body to another
2. introducing structures suitable for settlement of non-indigenous species, or the spread of invasive non-indigenous species known to exist in the area.

Provide an explanation on how you have considered this policy

The scheme will not result in any adverse impacts on the marine area through the introduction and transport of non-indigenous species.

No vessels will be used in the construction or operation of the proposed Scheme and vehicular access is not permitted onto the foreshore. The new sea wall is set back from the marine environment and therefore will not encourage the settlement or spread of marine invasive non-native species.

Further details are available in section 5 of the EclA report - marine ecology.

The proposal is therefore considered to be in accordance with S-NIS-1.

The proposal helps achieve south marine plan Objective 2: To manage existing, and aid the provision of new, infrastructure supporting marine and terrestrial activity.

Knowledge, understanding, appreciation & enjoyment

S-SOC-1

Proposals that enhance or promote social benefits will be supported. Proposals must demonstrate that they will, in order of preference:

1. avoid
2. minimise
3. mitigate significant adverse impacts which result in the displacement of other existing or authorised (but yet to be implemented) activities that generate social benefits

Provide an explanation on how you have considered this policy

The proposal is economically, environmentally, and socially sustainable, offering significant public benefits in terms of flood and coastal erosion protection as described within section 8 of the Planning, design and assessment document provided in support of the application.

The proposal is considered to be in accordance with S-SOC-1.

The proposal helps achieve south marine plan Objective 5: To avoid, minimise, mitigate displacement of marine activities, particularly where of importance to adjacent coastal communities, and where this is not practical to make sure significant adverse impacts on social benefits are avoided.

Marine litter

S-ML-1

Public authorities should ensure adequate provision for and removal of beach and marine litter on amenity beaches

Provide an explanation on how you have considered this policy

This policy is met via the broader outcomes and placemaking aspects of the scheme. Man-made debris and litter will be removed from the foreshore as part of the scheme.

See section 6 of the Planning design and access document provided in support of the application.

The proposal is considered to be in accordance with S-ML-1.

The proposal helps achieve south marine plan Objective 11: To complement and contribute to the achievement or maintenance of Good Ecological Status or Potential under the Water Framework Directive and Good Environmental Status under the Marine Strategy Framework Directive, with respect to descriptors for marine litter, non-indigenous species and underwater noise.

S-ML-2

The introduction of litter as a result of proposals should be avoided or minimised where practicable and activities that help reduce marine litter will be supported.

Provide an explanation on how you have considered this policy

The scheme will not introduce litter to the area as part of the construction activities. Specific mitigation will be recorded in the Site Waste Management Plan (to be submitted as part of the Construction Environment Management Plan during the Condition discharge phase). Sumps have been included in the new surface water drainage design to collect sediments/particulates before the water is discharged into the Lake – this represents an improvement on the existing conditions where surface water flows freely over the side of the existing sea wall from the hardstanding / car parking areas.

Additional information will be available in the Site Waste Management Plan to be submitted for discharge of conditions.

The proposal is considered to be in accordance with S-ML-2.

The proposal helps achieve south marine plan Objective 11: To complement and contribute to the achievement or maintenance of Good Ecological Status or Potential under the Water Framework Directive and Good Environmental Status under the Marine Strategy Framework Directive, with respect to descriptors for marine litter, non-indigenous species and underwater noise.

Marine protected areas

S-MPA-1

Proposals that support the objectives of marine protected areas and the ecological coherence of the marine protected area network will be supported. Proposals that may have adverse impacts on the objectives of marine protected areas and the ecological coherence of the marine protected area network must demonstrate that they will, in order of preference:

- a. avoid
- b. minimise
- c. mitigate adverse impacts, with due regard given to statutory advice on ecologically coherent network.

Provide an explanation on how you have considered this policy

The scheme is directly adjacent to environmentally designated sites. The proposal will not have adverse impacts on the objectives of marine protected areas and the ecological coherence of the marine protected area network.

Further, the proposal incorporates environmental enhancements, including the installation of a number of vertipools, that could be said to support that support the objectives of marine protected areas and the ecological coherence of the marine protected area network.

Further details are provided in section 6 of the habitat regulation assessment provided in support of the application.

The proposal is in accordance with S-MPA-1

The proposal helps achieve south marine plan Objective 10: To support marine protected area objectives and a well-managed ecologically coherent network with enhanced resilience and capability to adapt

S-MPA-2

Proposals that enhance a marine protected area's ability to adapt to climate change and so enhance the resilience of the marine protected area network will be supported. Proposals that may have adverse impacts on an individual marine protected area's ability to adapt to the effects of climate change and so reduce the resilience of the marine protected area network, must demonstrate that they will, in order of preference:

- a. avoid
- b. minimise
- c. mitigate adverse impacts

Provide an explanation on how you have considered this policy

The proposed design for the scheme takes into consideration climate change and sea level rise over the next 50 years. The proposals deliver the adopted 'Hold the Line' policy, as detailed within the Shoreline Management Plan and River Strategy.

Intertidal habitats that will be lost due to coastal squeeze that will arise from HTL policies are being compensated by the Regional Habitat Compensation Programme (RHCP), which will involve the creation of new habitats that are resilient to climate change and maintain the coherence of the Marine Protected Area network. There is no new encroachment into intertidal habitats as part of this scheme as the new seawall is landward of the existing wall.

Further details are available in section 2 of the habitat regulation assessment provided in support of the application.

The proposal is considered to be in accordance with S-MPA-2.

The proposal helps achieve south marine plan Objective 10: To support marine protected area objectives and a well-managed ecologically coherent network with enhanced resilience and capability to adapt

S-MPA-3

Where statutory advice states that a marine protected area site condition is deteriorating, or that features are moving or changing due to climate change, a suitable boundary change to ensure continued protection of the site and coherence of the overall network should be considered.

Provide an explanation on how you have considered this policy

The scheme is directly adjacent to and MPA (Name) environmentally designated sites. Mitigation measures have been incorporated to avoid adverse impacts on MPA features as described in the section 3 of the habitat regulation assessment.

Further the status of the MPA is favorable, there is no evidence to indicate features are moving or changing due to climate change. Pre-application engagement with Natural England was undertaken to support the design of the scheme and habitat regulation assessment and no advice was provided to the contrary.

S-MPA-3 is therefore not considered to be applicable to the proposal.

The proposal helps achieve south marine plan Objective 10: To support marine protected area objectives and a well-managed ecologically coherent network with enhanced resilience and capability to adapt

S-MPA-4

Until the ecological coherence of the marine protected area network is confirmed proposals should demonstrate that they will, in order of preference:

- a. avoid,
- b. minimise,
- c. mitigate adverse impacts on features that may be required to complete the network,
- d. if it is not possible to mitigate adverse impacts, proposals should state the case for proceeding.

Provide an explanation on how you have considered this policy

The Scheme falls within environmentally designated sites. Supporting habitats to features of the SPA/Ramsar sites are located adjacent to the scheme boundary. Mitigation measures have been incorporated to avoid adverse impacts on MPA features as described in the section 3 of the habitat regulation assessment. Further Environmental enhancements have been incorporated into the proposal.

The proposal is in accordance with S-MPA-4

The proposal helps achieve south marine plan Objective 10: To support marine protected area objectives and a well-managed ecologically coherent network with enhanced resilience and capability to adapt

Oil & gas

S-OG-1

Proposals in areas where a licence for oil and gas has been granted or formally applied for should not be authorised unless it is demonstrated that the other development or activity is compatible with the oil and gas activity.

Provide an explanation on how you have considered this policy

The scheme is not located in an area where a licence for oil and gas has been granted or formally applied for.

S-OG-1 is therefore not considered to be applicable to the proposal.

Ports, harbours & shipping

S-PS-2

Proposals that require static sea surface infrastructure or that significantly reduce under-keel clearance must not be authorised within International Maritime Organization routing systems unless there are exceptional circumstances.

Provide an explanation on how you have considered this policy

The scheme does not include static sea surface infrastructure.

S-PS-2 is therefore not considered to be applicable to the proposal.

S-PS-3

Proposals that require static sea surface infrastructure or that significantly reduce under-keel clearance which encroach upon high density navigation routes, or that pose a risk to the viability of passenger ferry services, must not be authorised unless there are exceptional circumstances.

Provide an explanation on how you have considered this policy

The scheme does not include static sea surface infrastructure.

S-PS-2 is therefore not considered to be applicable to the proposal.

Renewables

S-REN-1

Proposals that support the development of supply chains associated with the deployment of renewable energy will be supported.

Provide an explanation on how you have considered this policy

The scheme does not support or hinder the development of supply chains associated with the deployment of renewable energy.

S-REN-1 is therefore not considered to be applicable to the proposal.

Seascape & landscape

S-SCP-1

Proposals that may have a significant adverse impact upon the seascape of an area should only be supported if they demonstrate that they will, in order of preference:

- a. avoid
- b. minimise
- c. mitigate significant adverse impacts
- d. if it is not possible to mitigate significant adverse impacts, proposals should state the case for proceeding

Provide an explanation on how you have considered this policy

The proposal is located in an area that is an enclosed body of water. The scheme will not have any significant impact upon seascape. Landscape and environmental enhancements have been included in the proposed design to improve the aesthetics of the area.

Further details are provided in Section 3 of the Planning design and assessment document provided in support of the application.

The proposal is in accordance with S-SCP-1.

The proposal helps deliver Objective 9: To consider the seascape and its constituent marine character and visual resource and the landscape of the south marine plan areas.

Tourism & recreation

S-TR-1

Proposals supporting, promoting or facilitating tourism and recreation activities, particularly where this creates additional utilisation of related facilities beyond typical usage patterns, should be supported

Provide an explanation on how you have considered this policy

The main objective of the scheme is to provide a 1 in 100 year standard of protection for the next 50 years, reducing the risk of coastal flooding and erosion for the local community. The scheme includes environmental enhancements that will improve the recreational value of this part of the college grounds.

Further detailed consideration is available in sections 5 and 6 of the Planning design and Access Statement

The proposal is in accordance with S-TR-1.

The proposal helps achieve Objective 3: To support diversification of activities which improve socio-economic conditions in coastal communities.

S-TR-2

Proposals that enhance or promote tourism and recreation activities will be supported. Proposals for development must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate significant adverse impacts on tourism and recreation activities.

Provide an explanation on how you have considered this policy

The main objective of the scheme is to provide a 1 in 100 year standard of protection, reducing the risk of coastal flooding and erosion to the local community. The scheme includes environmental enhancements that will improve the recreational value of this part of the college grounds.

Further detailed consideration is available in sections 5 and 6 of the Planning design and Access Statement

The proposal is in accordance with S-TR-2.

The proposal helps achieve Objective 5: To avoid, minimise, mitigate displacement of marine activities, particularly where of importance to adjacent coastal communities, and where this is not practical to make sure significant adverse impacts on social benefits are avoided.

Underwater noise

S-UWN-1

Proposals generating impulsive sound, must contribute data to the UK Marine Noise Registry as per any currently agreed requirements. Public authorities must take account of any currently agreed targets under the UK Marine Strategy part one descriptor 11.

Provide an explanation on how you have considered this policy

No high impact / impulsive activities such as percussive piling are required for the Scheme. In any event MMO will condition the requirement to record data to the UK Marine Noise Registry as appropriate.

The proposal is considered to be in accordance with S- UWN-1

The proposal helps achieve Objective 11: To complement and contribute to the achievement or maintenance of Good Ecological Status or Potential under the Water Framework Directive and Good Environmental Status under the Marine Strategy Framework Directive, with respect to descriptors for marine litter, non-indigenous species and underwater noise.

S-UWN-2

Proposals that generate impulsive sound and/or ambient noise must demonstrate that they will, in order of preference:

- a. avoid
- b. minimise
- c. mitigate significant adverse impacts on highly mobile species
- d. if it is not possible to mitigate significant adverse impacts, proposals must state the case for proceeding.

Provide an explanation on how you have considered this policy

Best practice measures will be implemented to avoid and minimise any potential impact from the construction activities. The Construction Environmental Management plan (CEMP) will details these measures. All the works close to the water will take place over the summer months when the Hudspott Harbour SPA/Ramsar over-wintering birds are not present. Further details are available in Section 4 of the habitat regulation assessment and section 2 of the EclA provided in support of the application.

The proposal is considered to be in accordance with S- UWN-2

The proposal helps achieve south marine plan Objective 11: To complement and contribute to the achievement or maintenance of Good Ecological Status or Potential under the Water Framework Directive and Good Environmental Status under the Marine Strategy Framework Directive, with respect to descriptors for marine litter, non-indigenous species and underwater noise.

Water quality

S-WQ-1

Proposals that may have significant adverse impacts upon water environment, including upon habitats and species that can be of benefit to water quality must demonstrate that they will, in order of preference:

- a. avoid
- b. minimise
- c. mitigate significant adverse impacts.

Provide an explanation on how you have considered this policy

The scheme will not have significant adverse impacts upon the water environment and associated habitats and species. The only work taking place on the foreshore is either maintenance works or the installation of the vertipools and tide flaps. This will take place at low tide, by hand, over a two week, but up to a four-week, period due to tidally restricted working. Further information is contained in section 9 of the HRA and Section 3 WFD Compliance Assessment submitted in support of the application.

The proposal is therefore considered to be in accordance with S-WQ-1.

The proposal helps achieve south marine plan Objective 11: To complement and contribute to the achievement or maintenance of Good Ecological Status or Potential under the Water Framework Directive and Good Environmental Status under the Marine Strategy Framework Directive, with respect to descriptors for marine litter, non-indigenous species and underwater noise.

S-WQ-2

Activities that can deliver an improvement to water environment, or enhance habitats and species which can be of benefit to water quality should be supported.

Provide an explanation on how you have considered this policy

Vertipools will be installed on the existing sea wall. Research on vertipools has shown that both species diversity and biomass is significantly increased as a result of their installation (Hall, 2017).

The proposal is therefore considered to be in accordance with S-WQ-2.

The proposal helps achieve south marine Objective 12: To safeguard space for, and improve the quality of, the natural marine environment,

Additional plan and policy information

Provide any further information about your consideration of the Marine Policy Statement (MPS), marine plans and policy objectives you would like the MMO to take into account when determining your application.

This scheme is considered to comply with the policies set out in the South Marine Plan and the high-level marine plan objectives as set out above.

Further, it is important to note, the scheme will upgrade the existing coastal defence along a 240m stretch of coastline. Due to the existing condition of the coastal defence and the predicted effects of climate change, there is considerable and immediate coastal flood risk to the properties and assets located in the area. The scheme, as set out in the submitted plans and documents, minimise the impact on both the natural and historic environment, proposing mitigation against harm through the design, construction and operational stages. The proposed scheme is considered to meet the scheme objectives and demonstrates accordance with the relevant legislation and planning policy (both marine and terrestrial).

The proposal is economically, environmentally and socially sustainable, offering significant public benefits in terms of flood and coastal erosion protection. An Appropriate Assessment [AA] has concluded that the project will not adversely affect the integrity of the sites. Therefore, in accordance with the presumption in favour of sustainable development set out in paragraph 11 of the revised NPPF, the proposal should be approved without delay.