



# C-SCOPE Draft Marine Plan Responses and Actions

## **1. Overview of responses**

A total 21 of responses were received. The responses comprised of questionnaire response forms, letters and emails with specific comments.

The C-SCOPE team asked for views from DCF members and other stakeholders on the Draft C-SCOPE Marine Plan. The consultation ran from 16th December until 9th March 2012. The responses were collated by the C-SCOPE project officer and put in a document for the MSP Task & Finish Group to consider at a meeting on 19th March 2012. Notes and actions were taken at this meeting which provided agreement on the changes to be made to the Marine Plan policies. Amends to the wider text were made at the discretion of the C-SCOPE team, in consultation with the comment originator where necessary. This document has taken the comments from those who responded and has shown how they have been addressed. Comments on typing errors, grammar etc. has also been actioned.

**Table 1: Respondents to the consultation of the C-SCOPE Draft Marine Plan**

<b>Organisation/Group/Representation</b>	<b>Organisation/Group/Representation</b>
British Mountaineering Council	Natural England
Cefas	Peter Grey Diving
Dennis Jones	Peter Hebard – Realisations UK
Dorset County Council Planning Team	Portland Gas Storage Ltd
Dorset County Council Transport Team	Portland Harbour Authority Ltd
Dorset Cultural Partnership	Purbeck District Council
Dorset Wildlife Trust	Wessex Water
English Heritage	Weymouth & Portland National Sailing Academy
Halcrow Group Ltd	Vincent May
John Pepper Consultancy Ltd	The Crown Estate
National Trust	

## 2 General comments

1. We have an active interest in this project and it is pertinent to have this draft plan to review for the area between Portland Bill and Durlston Head with its stated objective to ‘...achieve a seamless, integrated approach to land and sea planning...’ given the on-going formulation of a national marine planning framework. (Chris Pater, English Heritage)
2. Quite a job for the Forum putting this together well done (Simon Kershaw, Cefas)
3. I had a read of the draft marine plan over the holiday break and thought it read really well. (Alan Frampton, Halcrow)
4. We are supportive of the draft document and the emphasis it places in seeking to ensure that the best available evidence is used to inform the development of marine planning in general. The over-arching impression is of a comprehensive, thoughtful and well-written document that is full of useful information presented in a readable, digestible fashion. Areas of potential concern for the National Trust relate to the upholding of all the statutory environmental designations that relate to the three holdings within the plan area. (Tony Flux, National Trust)
5. My prime interest is the basis it provides for developing local stakeholder/community-led Action Plans to maximise the Return-on-Investment of Marine Planning. DCF and the C-SCOPE Project are way ahead of the MMO's East Coast Pilot and, to my mind, far better focused on delivering the real benefits that could potentially be achieved, rather than strangling them in more red tape, as compulsory Marine Planning could easily do. (Peter Hebard)
6. Mind boggling!!! [sic] (Peter Grey Diving)
7. Attached are my comments...not many really as I support everything you say. Having been involved in Charting Progress (and CP2) with Defra and UKMMAS subsequently then providing indicators of progress in the future will continue to stimulate interest, buy -in and ownership of the issues. A fabulous document that really does cover all aspects of the marine environment. The document is of interest to all so an abridged version should, in addition to being on the website, be made available widely across all stakeholders as either a soft copy and / or as a hard copy document. It should stimulate readers of all ages irrespective of their role in the coastal and marine environment. All are stakeholders in this document whether residents, visitors, government or commerce. Well done to you and the team! (John Pepper, John Pepper Consultancy Ltd)
8. Like most policy documents I can't believe that anyone will ever read all of this stuff. It will just be cherry picked to support specific issues. (Dennis Jones)
9. We are supportive of the plan, which seeks to balance a wide range of interests and bring together a number of key issues relating to the coast and coastal waters. The plan is important in seeking co-operation between different interests and encouraging organisations to work in harmony, understanding the reasons for any conflicts and being prepared to find ways of resolving them. Whilst we recognise that it is a pilot, the plan should provide a good starting point – the next stage will be to look at how to use it to guide future work along the coast. (Mike Goater, Alison Turnock, Purbeck District Council)
10. As you know, we have and continue to support of the work that the C-Scope project has undertaken to date and believe this will be of significant use both when the MMO move to the south of England to plan and in the intervening period. In this instance, we don't feel it appropriate to comment on the consultation but look forward to further updates as the project nears completion. (Susan Kidd, The Crown Estate)

11. We support the C-SCOPE plan in its efforts to share and collate information, making it generally available, to maximise information sharing between all sectors. (Andrew Hindle, Portland Gas Storage Ltd)

12. I have read the whole document and am very impressed by it. (Vincent May)

13. We welcome the recognition in the Draft C-Scope Marine Plan of the importance of cultural heritage, but the plan needs to pay more attention to the role that contemporary culture plays in place making and shaping. Museums, libraries, archives and artistic institutions play a vital role in creating active, engaged and empowered individuals and communities. (Dorset Cultural Partnership)

14. I've had a quick scan through your document and it looks great but there's not a great deal that is relevant to climbing and coastal walking I don't think. (Rob Dyer, BMC)

15. Generally the C-SCOPE project officers and Dorset Coast Forum are to be congratulated on production of a well evidenced and beautifully illustrated plan that helps clarify the complex interactions between the marine and terrestrial environments and between the many and varied sectors that use the coast and inshore waters. The Draft C Scope plan provides a useful steer for statutory Local Plans and useful pointers for planning authorities, prospective developers/ business operators and other decision makers. (DCC Planning Team)

**Table 2: Comments and responses to the question "Have we adequately described in Chapter 2 the International and National Policy Context into which the C-SCOPE Marine Plan fits?"**

Comment	Response
Depending on the anticipated date of publication of the final plan, further integration with the requirements of the National Planning Policy Framework may be required	Agreed and updated accordingly
Could possibly have mentioned food security issues and the important role that aquaculture may play in the future (CFP reform and European aquaculture strategy?)	This is included in Forecasting Document, available as one of the supporting documents to the plan. It was felt to be too detailed to include in this section
2.2 mentions EU and International obligations under the MPS but a little expansion of what that actually means would help understanding. Equally, the idea of CCMA's and that fact that they are designated at the discretion of the LA and are not obligatory would be useful. 2.3 needs to point out that the full terms of reference for the MMO were set up under the Marine Act as well	Noted, but felt this was too much detail for what is basic context
Under international policy we recommend inclusion of other EU policy instruments such as the Common Fisheries Policy; responsibilities to deliver other international obligations, such as International Maritime Organisation requirements and Council of Europe Conventions. Under national policy, we recommend that while the Infrastructure Policy Commission will be abolished in April 2012, it is still the case that major infrastructure developments will be dealt with through the Planning Inspectorate.	Agreed and included.

**Table 3: Comments and responses to the question “Is the description in Chapter 3 of the purpose and status of the Draft C-SCOPE Marine Plan, and the summary of how it was developed, clear and accurate?”**

Comment	Response
<p>Page 15, first bullet point discussing shoreline management plans. I feel this could be amended to state the date when the SMP was adopted as is the case with other bullet points on this page.</p>	<p>Agreed and amended accordingly.</p>
<p>Table 2                      Recreation misspelt                      Wildlife viewing areas – Should the Portland Bird Observatory go in here?                      MCZ reference areas – The Fleet should be added                      Special Areas of Conservation – The Fleet should be added                      SSSI – South Dorset Coast should be added                      Fish Nursery Areas – Fleet should be added as a Bass Nursery Area                      Sea Grass Beds – Fleet should be added</p>	<p>Amended accordingly. Seagrass beds have been removed as not spatially managed outside of the MPA system, which is already covered.</p>
<p>Page 20, table 2, second 'spatial management measures' item against 'Dredging' sector. There is a typo here; it should say "sites" not "sires". Also, against the "dredging site or areas" item, it says that this is a 'non-active' feature in the plan area, but I'm pretty sure Weymouth Harbour is dredged on occasion; should this not be reflected in this table?</p>	<p>Agreed and amended accordingly</p>
<p>Table 2 – Existing measures                      The table in the step by step guide was a good starting point but need to be a bit careful about copying over some of the “measures”. For instance:</p> <ul style="list-style-type: none"> <li>● Ship to Ship Transfer Areas – None – is fine as there is such a designation and there aren't any in the plan area.</li> <li>● Fishing /Critical Habitat Designations – not sure what this means and not aware there is such a thing, so better to leave it out, otherwise it suggests there is no “critical habitat” in the area.</li> <li>● Wildlife Viewing Areas – if there is no such designation, better to leave it out rather than put “none”, though, as for the Critical Habitat Designation, it might be something worth having.</li> <li>● The marine mammal breeding/migration/feeding areas – there are no designations but might be better to say “not mapped” rather than “none”</li> <li>● Military/Unexploded Ordnance area – does this mean an official ordnance disposal ground? How can we take account of the large</li> </ul>	<p>Agreed; have removed any spatial measures that do not exist in the MMA. Have actioned all other points except:</p> <p>The table shows spatial management measures, as this is not an official ordnance disposal ground we cannot include it in the table. But issue</p>

<p>amount of ordnance on the seabed around Worbarrow from the Lulworth Ranges?</p> <ul style="list-style-type: none"> <li>• The seabird feeding areas listed are more likely to be wader feeding areas – you need to list the feeding grounds of the guillemots, razorbills, terns, shags, cormorants, gannets etc.</li> <li>• There is only one marine habitat listed – seagrass beds, why not list the BAP or FOCI habitats.</li> <li>• Fish spawning/nursery areas – there is some spatial data for black bream nest sites. This doesn't have to be limited to commercial species.</li> <li>• Add South Dorset Coast SSSI, Fleet rMCZ</li> <li>• Research – add Purbeck Marine Wildlife Reserve/Durlston Marine Research Area.</li> </ul>	<p>noted.</p> <p>The seabird feeding areas are not officially protected feeding areas, so have been removed.</p> <p>Have removed seagrass beds as these are not actually spatially managed, only within the MPA system, as are other BAP or FOCI species.</p> <p>Again, table is for spatially managed areas.</p>
<p>Table 2, Existing Spatial Management Measures within the C-SCOPE Marine Plan Area, includes reference to sand and gravel extraction areas noting that there are none within Marine Plan Area. Should Purbeck and Portland Stone extraction also be listed in this table – given the close proximity to the coastline from which extraction currently takes place?</p>	<p>Noted. However, these are marine spatial management measures that are already in place, terrestrial plans will manage stone extraction.</p>
<p>Table 2 is entitled 'Existing Spatial Management Measures' but further clarity would be helpful to identify what 'spatial management' is applicable. For example, submerged archaeological sites are mentioned, so it would be relevant to mention how policy supports the appropriate treatment of such sites as provided for in the UK Marine Policy Statement or other activities that help to develop knowledge of sites such as the Nautical Archaeology Society 'Adopt-a-Wreck' programme (as mentioned in section 4.7.2).</p>	<p>Table has been reviewed, and it was decided to only include spatial management measures which exist within the MMA (in this case protected wrecks). The table was intended to show the extent of current spatial measures, to reinforce the decision not to zone the marine plan. It was felt that further expansion of the table was not relevant.</p>
<p>The first paragraph suggests that the marine Plan being developed for Dorset waters is in some way an interim measure before the 'real' plan is produced. This seems misleading for whilst the C-SCOPE outputs will clearly help to inform any future MMO-led plan...that was never a direction laid down in the original bid or project brief.</p>	<p>Agreed and removed.</p>
<p>The statement regarding the aspiration that the C-SCOPE marine plan should become a material consideration in local planning requires further explanation. For example, an action plan should set out what is necessary to achieve this aspiration post June 2012.</p>	<p>Noted. This is something that DCF will take forward. In the meantime, this statement has been removed.</p>
<p>The draft Marine Plan recognises the relevance of the Dorset and East Devon</p>	<p>Agreed. However, the T&amp;F Group felt that the policies within the plan</p>

<p>Coast World Heritage Site Management Plan 2009-2014 in terms of education, science, cultural and historical knowledge and community awareness. Both these plans are material considerations for the terrestrial planning process but their role in true marine planning considerations is much less defined. There would be an opportunity here for the Marine Plan to advocate greater harmony between the three processes.</p>	<p>have achieved this, particularly SD 1 and SD 2</p>
<p>Whilst being lower down the political scale, Parish Plans are not mentioned and under the terms of the Localism Act, such plans (especially w.r.t. housing development) will become increasingly influential</p>	<p>Agreed, and sentence included to reflect this.</p>
<p>In section 3.2.3 reference is made to 'Dorset's coast and inshore waters' please explain how these areas are geographically defined</p>	<p>Footnote added</p>
<p>In 3.3.3 useful commentary was provided regarding spatial analysis of human activities and in particular the identification that many activities were 'neutral' interactions. Such information is important considering the definition of marine planning used in section 2.1 (second paragraph). In particular, if it was found that marine planning is not specifically about the allocation of space; what then is its purpose and how might its purpose be defined?</p>	<p>Agreed this is a challenging concept. However, over the course of the project it became apparent that we have few resources to allocate space to (especially once the specific location for the Navitus Bay windfarm site was chosen), and few interactions which require management. The plan does highlight potential space for aquaculture, which was one of the few practicable resources in the area (although it is not specifically reserved for this activity). The T&amp;F group were happy with the approach taken, and believed that specific allocation of space would be too rigid; flexibility being one of their criteria for the marine plan. Maybe a different pilot area could have been chosen, and it could perhaps be argued that the marine plan wasn't necessary if there is little pressure in the area... These lessons will be fed back to other marine planning practitioners.</p>
<p>It is important to stress the range of features that are considered to comprise the historic environment (e.g. submerged prehistoric features), as alluded to in section 4.7.1 of the draft marine plan. It was also noted that areas were identified outwith of the plan area such as Swanage Bay and that no particular reference was given to coastal features or relevant codes of conduct (e.g. voluntary measures to support World Heritage Site status etc).</p>	<p>Range of features included. Felt beyond the scope of this section to reference codes of conduct etc.</p>
<p>3.2.4 Integration with existing plans – The WestWey Partnership is developing a local plan, some mention should be made that LDFs and LPs are different but serve a similar function.</p> <p>Planning Policy Statement 12 will be superseded by the NPPF which is due to be finalised this month and new LPs will need to be in conformity to this.</p> <p>The Local Transport Plan (LTP) is not part of any Local Development Framework (LDF). In terms of policy the LTP sits alongside LDFs and LPs as a material planning consideration but is distinctly different and shouldn't be under this</p>	<p>Agreed. Text amended accordingly.</p>

<p>heading. As such, it is important that the LTP should be the subject of separate detailed description. Transport Planning Group is able to assist with the drafting of this section of text. It may also be necessary to separate strategic flood risk assessments as these are evidence documents that support the LDFs/LPs and MWDF.</p>	
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**Table 4: Comments and responses to the question “Is the description of the C-SCOPE Marine Plan Area in chapter 4 comprehensive, clear and accurate?”**

Comment	Response
<p>4.2 Geology - gives a description of the stratigraphy, but doesn't highlight the palaeontology - and it is this that comprises probably the most significant strand of Dorset's coastal cultural heritage - a huge influence on Darwin – and manifest in the fossils now evident in Dorset museums.</p>	<p>There is a mention of fossils, but this section is more to highlight how the geology influences the marine environment and issues which need to be addressed through marine planning.</p>
<p>This section seems to take a peculiarly narrow view of cultural heritage – it largely describes the built and natural environment and events that occurred within it. There is no recognition of the institutions - be they museums, archives or libraries that retain evidence and often primary material relating to that heritage - it simply seems to be absent. We suggest that this section should recognise the importance of contemporary culture.</p>	<p>Noted, but draw attention to section 3.1, in that the marine plan “... seeks to avoid duplication as far as possible but does, in conjunction with the Coastal Explorer Planning tool developed in parallel, sign-post users to other relevant plans and strategies.” The Task &amp; Finish Group believed that terrestrial plans and strategies adequately cover these issues. Contemporary culture has been included in the tourism and recreation section, and also referenced in the justification for policy VEU7. The Jurassic Coast Arts Strategy is now sign-posted.</p>
<p>Marine: We believe this section is factually incorrect - it speaks of a major sea battle in Swanage Bay in medieval times between King Alfred and the Danes. Firstly, we understand Alfred is Dark Ages and secondly, we believe the battle didn't actually take place - a Danish fleet foundered after sailing into the treacherous rocks off Peveril Point.</p>	<p>Noted, consulted with DCC historic environment team and now changed to early medieval. They advised that this episode is referenced in the Anglo-Saxon chronicles.</p>
<p>4.8.3 We suggest that this section should include reference to the role of contemporary culture. This is relevant to the plan's objectives, in particular 2, 3 and 7.</p>	<p>Noted, and reference included.</p>
<p>Figures 14a and 14b. These should have the source of the maps shown as these two figures stated in the captions (i.e. SCOPAC, 2004).</p>	<p>Agreed; formatting error. Now included.</p>
<p>(Figure 9) gives the mean surface water temperatures. This figure is 30 years' old and it would be interesting to have a more up-to-date map...if only for comparison purposes.</p>	<p>No modern maps available, but have removed this figure and replaced with graphs derived from CCO data.</p>
<p>Seawater temperature – could put some more up-to-date figures from the local wave buoys.</p>	<p>Have added graphs derived from CCO data.</p>
<p>Section 4.7.1 The only omission noted is the quarrying of the cliffs for Purbeck stone during the 18<sup>th</sup> and 19<sup>th</sup> centuries.</p>	<p>Agreed and now included.</p>



<p>4.8.3 covers land-based Tourism and Recreation. The draft report states that 13% of the total Dorset workforce is employed in this sector. In the seaside towns, the % is even higher. More could be written in this section, especially regarding the changing demographics of the visitors to the Dorset Coast (higher dependency upon OAP coach parties, growth in geotourism etc.) but the detail is probably sufficient for immediate purposes.</p>	<p>Agreed, have added a sentence to reflect this.</p>
<p>4.8.7 Weymouth Bay and Portland Harbour are widely recognised as some of the best small boat sailing waters in the World, let alone the UK! We are underselling the attractiveness of the area to the sailing community in the draft plan.</p> <p>In the second paragraph, this needs bringing up to date. To date, the Sailing Academy is calculated (by DCC in the most recent Economic Impact Assessment in 2009) to have contributed in the region of £70 million to the local economy and the annual assessment of this effect (discounting effects of the Olympics) is about £11.4 million – supporting about 180 FTE jobs in the wider local economy, in addition to the people directly employed on the Academy site.</p>	<p>Agreed and amended accordingly</p>
<p>The double low and double high tide are a variation of the same phenomenon (don't ask me to explain it). To the east of St Albans, the first low is less pronounced, so it seems like a dip between two highs, to the west (and certainly at Kimmeridge) the first low is an appreciable low water, though the second is usually lower, especially at springs.</p>	<p>Agreed, and amended accordingly</p>
<p>Sediment transport – use the data from Justin to show this</p>	<p>As we don't have the detail of how this was produced and what it shows, felt best to use established models used by the SMPs.</p>
<p>Coastal and marine ecology</p> <ul style="list-style-type: none"> <li>● Italicise all latin species names throughout.</li> <li>● Must show species names as well as the descriptions of the BAP species on the map legend. I presume bivalve = oyster, jellyfish = stalked jellyfish, etc</li> <li>● The middle shore is often dominated by brown seaweeds with associated limpets, winkles and top shells, with more exposed shore being dominated by barnacles and limpets</li> <li>● Lower shores frequently have a rich seaweed assemblage, possibly influenced by the unusual tidal regime. The extended low-water stand which occurs west of St Albans Head is especially significant at equinoctial spring tides when the extreme lower parts of the shore may be exposed for much of the afternoon. Peveril Point to Durlston Head was nominated as a European Important Plant Area for marine algae, as</li> </ul>	<p>Agreed and all bullet points actioned accordingly.</p>

<p>a “diversity hotspot” with many nationally rare species. Kimmeridge Ledges, Weymouth and The Fleet were nominated as Import Plant Areas for algae in the UK</p> <ul style="list-style-type: none"> <li>● Portland Harbour – redband fish, black-faced blenny and Couchs goby.</li> <li>● <i>Aiptasia</i> is far more widespread and common in the area than the Seastar report suggests – not well sampled by drop video</li> <li>● Areas of extremely dense aggregations of gravel sea-cucumbers (<i>Neopentadactyla mixta</i>) have been reported by divers in Worbarrow Bay and between St Albans and Swanage.</li> <li>● In deeper water south and east of St Albans Ledge, the DORIS ground-truthing survey found extensive areas of stable cobbles with a rich covering of encrusting sponges.</li> <li>● DORIS survey covered a large area but didn’t take much account of existing data – Studland to Portland SAC site selection doc is a good source, as is DWT Seasearch report 2004</li> </ul>	
<p>4.8.2 – Aquaculture. Can you list the current class of the designated shellfish waters?</p>	<p>Table now included. Information also updated as per Topic Paper.</p>
<p>4.8.4 and figure 25. Where did the data on dive sites come from? I’ve attached a GIS layer of Seasearch dives which shows that there are more dive sites than the few regular ones visited by dive charters. The DORIS data are also being used by local divers to find new dive sites. Would question the statement that there are several easily accessible shore-diving sites.</p>	<p>Dive site map was never intended to be extensive, just the more popular sites – have added this to key. Have deleted ‘easily’ to accessible shore-diving.</p>
<p>4.8.5 – The plan to sink a ship would create an artificial wreck, rather than an artificial reef – the aim is to create a diving attraction, not a habitat.</p>	<p>Agreed, and amended accordingly</p>
<p>4.8.6 – mention Recycle Fish campaign</p>	<p>Agreed, and amended accordingly</p>
<p>P58 – twice hourly train service to London, rather than half-hour (they’re 20/40 mins apart)</p>	<p>Noted – transport section re-written by DCC transport team.</p>
<p>P 60 – Military – mention legacy of ordnance on the seabed around the Lulworth Ranges</p>	<p>Agreed, and amended accordingly</p>
<p>P 66 – climate change – see <a href="http://www.pml.ac.uk/pdf/ocean_under_stress.pdf">http://www.pml.ac.uk/pdf/ocean_under_stress.pdf</a> This section is environmental change, not just climate change. As well as sea-level rise, ocean warming, changes in currents, increased storminess, ocean acidification is a major issue.</p>	<p>Agreed, and amended accordingly</p>
<p>The description provided of the marine plan area is very comprehensive with perhaps too much inclusion of incidental information (e.g. transport infrastructure, agriculture etc). It is therefore suggested that section 4.1 should set an inland limit, which it is accepted could be highly selective (e.g. inclusion of Fleet Lagoon, but not Chesil Beach).</p>	<p>Noted, but felt that these sections were necessary.</p>
<p>In section 4.3 the explanation of extreme wave heights experienced at</p>	<p>Agreed and amended accordingly.</p>

<p>Kimmeridge Bay is somewhat confusing and should be explained in reference to its specific location in the mid English Channel.</p>	
<p>In section 4.4 what is 'Good Current Overall Potential'? If this status is relevant to the marine plan area then an explanation should be provided (cf. section 4.7.3).</p>	<p>Footnote added.</p>
<p>Section 4.6 mentions '...seasonal low levels of sailing and recreational activities', but are other seasons busy or very busy? Mention is also made regarding Portland Harbour and valuable habitats; are these exclusively natural habitats or is equal biodiversity status afforded to artificial structures?</p>	<p>Agreed and amended to clarify.</p>
<p>The impression is that each section in this chapter describes features going from west to east across the plan area. It is therefore recommended that sub-sections are used e.g. Portland to Weymouth within which all aspects of the environment are described, on both spatial and temporal scales.</p>	<p>Noted, but T&amp;F Group felt this was not necessary.</p>
<p>We noted reference to the Clavell Tower, which perhaps should be described as a 'useful example' of the challenges presented by dynamic coastal conditions rather than a 'good example'.</p>	<p>Agreed and amended accordingly.</p>
<p>Section 4.8.9 is too brief and seems irrelevant given the attention given to this topic in sections 4.8.10 to 4.8.12. Section 4.8.13 could have been expanded to describe the economic importance of the oil sector (and associated service industries) in comparison with other sectors, such as tourism.</p>	<p>Agreed; formatting error. Oil sector amended accordingly.</p>
<p>Paragraph 4.8.11 Suggested revision of paragraph relating to Portland Gas to bring it up to date</p>	<p>Agreed and paragraph updated with text supplied.</p>
<p>4.8.13 – Suggested update of paragraph relating to oil and gas...</p>	<p>Agreed and paragraph updated with text supplied.</p>
<p>We think that some of the figures used are incorrect e.g. There are currently 57 fishing vessels registered to Weymouth Harbour, and in 2008 109,000 tonnes demersal fish worth £556,000 and 2,422,000 shellfish worth £1,742,000 were land Refer to page 46 as i think should be should be approximately 1900 tonnes.</p>	<p>Agreed, these were are old figures and not used in the final draft... figures are now correct.</p>
<p>The overview of the plan area is very comprehensive. It gives a detailed and complete description of the context in which the plan sits and should remain in the final full document. There are however a number of points to be addressed before the plan is finalised.</p>	<p>Consulted with DCC transport team. They have re-written the transport section. All points were discussed and amends made accordingly.</p>

**Table 5: Comments and responses to the question “The Objectives take their lead from nationally set objectives for marine planning, adapted to reflect local needs and opportunities – do you agree with this approach?”**

Comment	Response
Yes – Assuming they have been tested and adjusted through local stakeholder consultation.	Objectives were led by stakeholders in an iterative process which took nine months.
Yes, this approach should help to engender a degree of local interest and support to deliver the marine plan. However, it is important that in conjunction with securing local support it is also possible to demonstrate local accountability.	Noted. It was felt that through the community road-shows local support had been gained.

**Table 6: Comments and responses to the question “The Vision mirrors that set for the Dorset Coast Strategy to ensure consistency – do you agree with this approach?”**

Comment	Response
It is appropriate that the vision is informed by the coast strategy and that both visions incorporate an understanding of ‘change’. For example, the use of terms such as ‘protected’, ‘enhanced’, ‘diverse’ and ‘thriving’ should acknowledge that changing conditions (economically, socially and environmentally) should influence planning frameworks.	Noted, this has been highlighted as a future project within the World Heritage, AONB and DCF teams.

**Table 7: Policies and issues discussed by the MSP Task & Finish Group on 19<sup>th</sup> March 2012**

Please make any comments on the policies which appear under each of the objectives, with particular reference to the following questions:

- i) Is the policy expressed clearly?
- ii) Is the policy likely to contribute to the achievement of sustainable development?
- iii) Is the policy reasonable and justified adequately in terms of the evidence presented?

Policy Number	Comment	Response
<p>HME 1: Development or activities will respect the purpose of international and national environmental designations within the marine and coastal environment and contribute to their enhancement where possible.</p>	<p>Should acknowledge that some developments or activities might be entirely benign</p>	<p>Noted, but T&amp;F Group agreed that if it is benign then there is no problem for development. No changes.</p>
<p>HME 2: Future development will take account of, and support delivery of, the management plans for, European and national environmental designations, including Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Sites of Special Scientific Interest (SSSIs) and Marine Conservation Zones (MCZs), Areas of Outstanding Natural Beauty (AONB) and World Heritage Sites.</p>	<p>Is strategic in nature and we support this aspect of the policy but further refinement of wording to reflect legislation is important to avoid conflict between policy and legislation</p>	<p>Have included reference to EIA regulations in the justification for policies HME 1 and HME 2</p>

	<p>There may be merit in linking this to terrestrial plans and the need to avoid or mitigate adverse impacts.</p>	<p>Agreed. Consulted with DCC spatial planners and have added the requirement to be consistent with terrestrial plans.</p>
<p>HME 3: Developments or activities should have regard to the potential adverse effect either directly, indirectly or cumulatively on habitats or species which are not designated under European or National legislation but which warrant protection to maintain wider ecosystem function, or as providers of marine goods and services.</p>	<p>There may be merit in linking this to terrestrial plans and the need to avoid or mitigate adverse impacts.</p>	<p>Agreed. Consulted with DCC spatial planners and have added the requirement to be consistent with terrestrial plans.</p>
	<p>Whilst we recognise the importance of assessing the impact of developments and activities against a wide range of features, Policy HME 3 has the potential to vastly increase the possible scope of environmental assessment required in association with new development. We believe the policy as it stands requires either further clarification to place reasonable limits on the range of assessments which could be expected under this policy, or to provide</p>	<p>Noted. This policy has terrestrial parallels which do not add extra burden. A clarification has been included in the justification, which reads "This policy seeks to ensure ecosystem function is considered in the context of any existing permitting processes and it is therefore envisaged that there will not be an additional process burden on developers."</p>

	<p>Aims to extend protection to all habitats and species in the area. While it is understandable that why you should wish to introduce the precautionary principle to protect as yet little known ecosystems, this approach may lead to conflict with other policies (such as TCC3 which encourages developments or activities which promote employment outside the normal season</p>	<p>Noted. This policy has terrestrial parallels which do not add extra burden. A clarification has been included in the justification, which reads "This policy seeks to ensure ecosystem function is considered in the context of any existing permitting processes, and the hierarchy of significance for protected sites respected. It is therefore envisaged that there will not be an additional process burden on developers."</p>
	<p>Would this be the NIMF list (nationally important marine features)?</p>	<p>Yes, but not exclusively, also includes BAP and Seasearch data</p>

<p>HME 4: Where habitat or ecosystem degradation is apparent, the opportunity to restore the integrity of the site should be taken where possible.</p>	<p>The second paragraph under ‘Restoration of degraded ecosystems’ should be revised to improve clarity as it seems to imply justification for a policy to require more than is actually required by statutory provision. It is important that all policies are correctly supported by legislative frameworks or other accepted non-statutory programmes</p>	<p>Noted. This policy does ask developers to go beyond statutory provision, but it is a request, not a requirement. The T&amp;F Group felt this was adequately explained within the supporting justification text. However, the text has been altered to clarify the geographic extent of ‘the site’ “Where existing habitat or ecosystem degradation is apparent at potential development sites, the opportunity to restore the integrity of the site should be taken where possible.”</p>
	<p>We believe that it may be necessary to clarify the geographical extent of this policy. For example, confusion could be caused by the expectation to “restore the integrity of the site” – does this refer to the development site, any designated site within which a development is located or a wider unit?</p>	<p>Agreed, this did need clarification. Text now reads “Where existing habitat or ecosystem degradation is apparent at potential development sites, the opportunity to restore the integrity of the site should be taken where possible.”</p>
	<p>Assumes that degradation results from human activities but it can also result from natural stresses. Refers to Sensitivity Maps, but many of these are incomplete and all appear to take no account of temporal variations in the spatial patterns</p> <p>Could this be more pre-emptive? For example it could state that where development is likely to have an adverse impact, measures should be put in place to minimise or avoid these. This would make the policy more enforceable.</p>	<p>Sensitivity maps not referred to in HME 4. Appendix 5 stated that he sensitivity maps were not yet complete. There are acknowledged weaknesses in sensitivity mapping of the seabed, including the lack of temporal data, and these will be clearly set out in the final Appendix.</p> <p>This policy focuses on restoration of already degraded habitats and is additional to policies SME 2 and SME 3 which state the need for best practice and satisfactory mitigation.</p>



<p>HME 5: In addition to complying with the Common Fisheries Policy and Southern Inshore Fisheries and Conservation Authority byelaws, as a minimum requirement the commercial exploitation of fish and shellfish should be within safe biological limits.</p>	<p><i>“There is no evidence of serious declines, but the safest working assumption is that exploitation levels are close to the sustainable limit”</i>. Not necessarily a safe assumption - the lack of data itself is a concern.</p>	<p>Agreed, changed to ‘best available evidence states that’</p>
<p>HME 6: Fisheries enhancement initiatives which contribute to the maintenance and development of a sustainable fishing industry in Dorset will be encouraged where consistent with other policies in this plan.</p>	<p>No comments received</p>	

<p>HME 7: Developments which have the potential to create sustained or long term changes to temperature, salinity, or pH should avoid seabed areas highly sensitive to these pressures as shown in Appendix 5, Sensitivity Maps. Developments must demonstrate that Best Available Technique<sup>10</sup> will be used during survey and construction and a Best Practicable Environmental Options assessment conducted for the operating phase.</p>	<p>No comments received</p>	<p>Sensitivity maps reviewed. . There are acknowledged weaknesses in sensitivity mapping of the seabed, including the lack of temporal data, and the policy has consequently been changed: “Developments which have the potential to create sustained or long term changes to temperature, salinity, or pH should refer to Appendix 5, Sensitivity Maps, and avoid seabed areas highly sensitive to these pressures wherever possible. Developments must demonstrate that Best Available Technique<sup>1</sup> will be used during survey and construction and a Best Practicable Environmental Options assessment conducted for the operating phase.”</p>
<p>HME 8: Developments near the coast must consider the capacity of emergency/storm drains, combined (surface and sewer) systems and sewage treatment facilities with a view to minimising potential impacts on the marine environment and human health via short and long-sea outfalls.</p>	<p>We welcome the inclusion of Policy HME 8 – “Developments near the coast must consider the capacity of emergency/storm drains, combined (surface and sewer) systems and sewage treatment facilities with a view to minimising potential impacts on the marine environment and human health via short and long-sea outfalls”. We consider that additional wording in this policy may be beneficial to secure the necessary asset improvement which is sought (please refer to text in General Comments section, below).</p>	<p>Noted. A new policy has been added under objective 3 “SME 5: Applications for new sites, extensions or development to existing sites required to deliver essential public services will be supported providing that they do not give rise to significant adverse affect to marine or other environmental features, local amenity or landscape. The need for access to existing infrastructure for emergency repairs and statutory maintenance should be recognised.”</p>

	<p>A stronger link to terrestrial plans may be helpful here. For example, 'development plans should seek to ensure that development will be expected to take such issues into account and ensure appropriate measures (such as sustainable urban drainage systems) are put in place'.</p>	<p>Agreed and have included suggested wording into the policy</p>
<p>HME 9: Developments or activities which present risk of systematic and or accidental release of hazardous or organic substances should only take place under licensed conditions with appropriate safety measures and contingency plans in place. New developments should avoid seabed areas highly sensitive to these pressures as shown in Appendix 5, Sensitivity Maps.</p>	<p>Arish Mell pipe - radio-active waste not covered in this section</p>	<p>Agreed and paragraph included in the justification.</p> <p>Sensitivity maps reviewed. There are acknowledged weaknesses in sensitivity mapping of the seabed, including the lack of temporal data, and the policy has consequently been changed: "Developments or activities which present risk of systematic and or accidental release of hazardous or organic substances should only take place under licensed conditions with appropriate safety measures and contingency plans in place. New developments should refer to Appendix 5, Sensitivity Maps, and avoid seabed areas highly sensitive to these pressures wherever possible."</p>
<p>HME 10: Developments or activities which have the potential to physically damage or smother habitat should avoid seabed areas highly sensitive to this type of pressure as shown in Appendix 5 (Sensitivity Maps). Such developments should use Best Available Technique during survey and construction and a Best Practicable Environmental Options assessment should be conducted for the operating phase.</p>	<p>This section covers physical damage as well as habitat removal (scraping, smothering etc). Should cover activity as well as development and not exclude mobile fishing gear. Impacts of fishing elsewhere in the plan seem restricted to impacts on the target species. The plan area contains areas of stable cobbles/pebbles with rich faunal crust, especially sponges. This would be particularly sensitive to physical disturbance/abrasion</p>	<p>Agreed. As it stands, the marine plan is for sustainable development, and fisheries control has not been included (the integration of fisheries is a key challenge for marine planning). The non-statutory nature of the plan means we cannot create no-benthic trawl areas. Have included a paragraph within the justification pointing out that benthic trawling is damaging to the seabed, but that this is controlled by EU and national policy as well as local byelaws.</p> <p>Sensitivity maps reviewed. There are acknowledged weaknesses in sensitivity mapping of the seabed, including the lack of temporal data, and the policy has consequently been changed: "Developments or activities which have the potential to physically damage or smother habitat should refer to Appendix 5, Sensitivity Maps, and avoid seabed areas highly sensitive to these pressures wherever possible. Such</p>

		<p>developments should use Best Available Technique during survey and construction and a Best Practicable Environmental Options assessment should be conducted for the operating phase.”</p>
<p>HME 10 &amp; 11</p>	<p>Whilst we support the principles of these policies, we would note that where Wessex Water has existing infrastructure, these outfalls, consented discharge points and any associated pipework forms part of our infrastructure in the area, which means that Wessex Water will require immediate access to the pipes in the event of any emergency (for example, a pipe burst). In all other cases (such as planned maintenance work), staff are aware of the requirement to gain, where necessary, consent from MMO/Natural England. Whilst we support the protection of the environment, these policies may have impacts upon the undertaking of our statutory duties. I would therefore request that access to and normal maintenance of our assets is recognised as appropriate and acceptable within these policies.</p>	<p>Noted. A new policy has been added under objective 3 “SME 5: Applications for new sites, extensions or development to existing sites required to deliver essential public services will be supported providing that they do not give rise to significant adverse affect to marine or other environmental features, local amenity or landscape. The need for access to existing infrastructure for emergency repairs and statutory maintenance should be recognised.”</p>

<p>HME 11: Developments or activities which have the potential to generate noise, vibration, and electromagnetism, or affect air quality during construction or operation should be avoided unless it can be demonstrated that the effects on both the environment and people can be made acceptable. Developers should adopt Best Available Technique during construction, in line with Joint Nature Conservation Committee (JNCC) guidance<sup>12</sup>.</p>	<p>Talks of effects being made “acceptable”. To whom, how is acceptability measured and over what timescales?</p>	<p>Agreed, have removed acceptable. Policy now reads “Developments or activities which have the potential to generate noise, vibration, and electromagnetism, or affect air quality during construction or operation should avoid or minimise impacts to levels which do not cause permanent or long term harm on both the environment and people. Developers should adopt Best Available Technique during construction, in line with Joint Nature Conservation Committee (JNCC) guidance”.</p>
	<p>Some development may not be able to avoid some disturbance, so the policy could strengthen its emphasis upon development ensuring it avoids or minimises impacts to levels which do not cause permanent or long term harm.</p>	<p>Agreed, and have changed policy to reflect suggested wording</p>
<p>HME 12: All new developments should include appropriate facilities for the sustainable disposal and recycling of waste and litter.</p>	<p>There's more to reducing at source than recycling and disposal. Re-use or reducing disposable packaging should be the preferred option. The "bag-for-life" or even "bottle-for-life" idea would reduce plastic carrier bags/plastic water bottles thrown away generally</p>	<p>“Bag for life” initiatives etc should be addressed through terrestrial planning. However have included an aim to reduce waste production. Policy now reads.... All new developments should aim to minimise waste production, and include appropriate facilities for the sustainable disposal and recycling of waste and litter.</p>

<p>HME 13: The volume and impacts of marine litter should be reduced through both local initiatives, and national and international action to address the issues at source.</p>	<p>No comments received</p>	
<p>HME 14: New developments and activities which could potentially introduce or spread non-indigenous species should take appropriate measures to minimise this risk. Marinas, mariculture developments and port operators are encouraged to set up early detection systems for known threats.</p>	<p>I agree that new projects and marinas should take all measures possible to prevent the introduction of invasive marine species. All aquaculture production businesses are obliged to have bio-security plans under the new Aquatic Animal Health directive and disease control measures are in place for serious diseases. Many are very concerned about the arrival of species such as <i>Didemnum vexillum</i>. I do not agree that the introduction of the pacific oyster and the manila clam are of particular concern and bring with them new and often virulent diseases. Pacific Oysters have been grown in the Fleet, the harbour and around the breakwater for many years as have clams in Poole harbour. These provide benefits to the environment and would not seem to have caused a problem. Control of the pacific oyster is not really feasible or sensible due to the current biology and distribution of these organisms. The introduction of oysters into protected areas would be subject to appropriate assessment under the habitat regulations.</p>	<p>Acknowledge correction on pacific oysters and manila clams. Changed in justification text. Also have clarified that it is <i>invasive non-native species</i> which need to be monitored and included a footnote explaining what is meant by this term. Have added the need for biosecurity plans etc into the justification.</p>

	<p>HME 14 is flawed. It is not sufficient to react only to 'known threats' – some of the most significant threats have arisen from unexpected events. This policy needs to recognise preparedness for threats as they arise, known or unknown.</p>	<p>Noted. However, the T&amp;F Group felt that we cannot plan for unknowns, and was happy with the policy, subject to the changes above.</p>
	<p>Does HME 14 also link with Objective 8?</p> <p><i>“The main mode of introduction and transfer of non-indigenous species to their non-native environment is by the transport and discharge of ballast water”, is this true? Mariculture seems to be behind a lot of the now well-established species - Sargassum, Crepidula, Undaria, Crassostrea, Tapes philippinarum etc. D vexillum now in Kent</i></p>	<p>Wording in justification altered to give equal weighting to introduction and transfer mechanisms.</p>
<p>TCC 1: Developments which provide opportunities to help tackle deprivation in coastal towns and communities and to drive community regeneration will be supported where consistent with the other policies in this plan.</p>	<p>Begs the question (as do other policies) of how consistency with other policies will be demonstrated. Who will be responsible for making this judgement?</p>	<p>This concern has been noted throughout and a section at the start of Chapter 5 (Marine Plan policies) has been added to clarify responsibilities.</p>

<p>TCC 2: Developments which can demonstrate benefits to the local population through skills development and training, and which contribute positively to the economy of coastal areas will be supported.</p>	<p>This is a laudable aim (to support developments that offer skills training/employment) but could it be better phrased in a way that can be measured or applied as a policy?</p>	<p>Agreed, have modified policy to include job creation. Now reads “Developments which can demonstrate benefits to the local population through skills development and training, and which contribute positively to the economy of coastal areas through job creation will be supported.”</p>
<p>TCC 3: Developments or activities which provide employment opportunities in coastal areas outside the existing seasonal market should be promoted, particularly where these support the Dorset, Bournemouth &amp; Poole Local Enterprise Partnership (LEP) vision for a ‘green knowledge economy’.</p>	<p>Should include green technologies. What is a ‘green knowledge economy’ worth without practical solutions made locally?</p>	<p>Noted. T&amp;F Group felt that this was sufficiently supported throughout the plan, particularly BY SME 5, SME 9, SME 10 and SME 11. Consulted with DCC economic development team who are leading on the LEP, and they remain focused on a Green Knowledge Economy.</p>
<p>TCC 4: Development should respect the historic character of coastal villages and towns and the maritime occupations that exist there.</p>	<p>Page 84: the first paragraph recognises the coast as a source of inspiration for both scientists and artists. We suggest that the plan should go on to make the connection that scientists and artists can separately and jointly play an important role in engaging people with the marine and coastal environment. This is central to the Jurassic Coast Arts Strategy, and supports achievement of the C-Scope plan’s action.</p>	<p>It was felt that this was unnecessary in the context of a marine plan. This policy is not about engagement, but about considerations for future developments</p>



	<p>TCC 4 is noted and delivery will require a coordinated approach with VEU 4</p>	<p>Agreed, and reference made within justification.</p>
<p>TCC 5: Initiatives which promote locally caught or farmed sustainable seafood will be supported.</p>	<p>No comments received</p>	
<p>TCC 6: Developments and activities which encourage sensitive use of the coast and marine environment, promote community involvement and increase awareness of the value of the cultural and natural environment will be supported.</p>	<p>Justification; the ability to visualise the seabed helps create familiarity, leading to that sense of ownership</p>	<p>Agreed and included sentence in justification</p>

<p>TCC 7: Developments and activities which will enable and encourage local communities to use the marine and coastal environment to become more physically active, and thus increase health and well-being, will be supported.</p>	<p>The recreational activities listed under <i>Promoting marine and coastal recreational activities which enhance health and well-being</i> are all related to sport and physical activity. While these are part of the wider cultural sphere, it is important that the plan recognises the role of other aspects of cultural activity in health and wellbeing. Contemporary culture provides encouragement for physical activity and routes to wider health and wellbeing. See Dorset Cultural Strategy 2009 -2014. NB This also applies to the Topic Paper on Recreation.</p>	<p>The marine plan is focused on how the marine and coastal environment can help to increase help and well being, and therefore deliberately targets physical activity. It was felt that terrestrial plans and initiatives adequately cover the cultural aspects of health and well being.</p>
<p>SME 1: Sustainable economic development in the coastal and marine environment will be supported. Sustainable marine industries will be defined as those which:</p> <ul style="list-style-type: none"> <li>• Respect and where possible enhance the environment in which they operate, and on which they depend for their existence;</li> <li>• support the coastal communities in which they operate through high quality employment and training opportunities; and</li> <li>• make efficient, equitable use of natural and human resources available to them.</li> </ul>	<p>Needs sustainable marine industries which produce (this isn't clear as the policy is drafted).</p>	<p>The T&amp;F Group felt that yes, we do need more productive industries, but that this should not be exclusive; for instance tourism doesn't 'produce' anything but is still very valuable to the local economy.</p>

<p>SME 2: In addition to complying with the other policies in this plan, major development in the marine and coastal environment should be tested for its contribution to, and impact on, the criteria presented in Box A (below).</p>	<p>Reference to major development is ambiguous as this is not defined. Perhaps this could be rephrased to state ‘development which is likely to have an adverse impact upon any of the criteria should be accompanied by an assessment of impacts and mitigation measures’.</p>	<p>Agreed. A definition of ‘major’ has been included as a footnote. “Major being defined as any development which could affect an International, European or nationally designated site and/or requires an Environmental Impact Assessment.”</p>
	<p>The local transport network is not included as an area upon which to test for impacts of development. Obviously, all development is subject transport development management procedures and depending on scale will be required to submit a transport assessment. However, it is felt that the local transport network should be included in this section.</p>	<p>Agreed and included.</p>
<p>SME 2 &amp; SME 3 (SME 3: Development which would have an adverse impact, directly, indirectly or cumulatively on the criteria laid out in Box A, and which can not be satisfactorily mitigated or compensated for, should be avoided.)</p>	<p>Policy SME 2 and SME 3 allude to assessment criteria for projects, but clarity is required to explain how the use of such criteria also supports the formal screening of projects as required by Marine Works (EIA) Regulations (Amendment) 2011 and the Town &amp; Country Planning (EIA) Regulations 1999.</p> <p>We noted the inclusion of Figure 43 (areas of archaeological potential) and we acknowledge that potential exists through the plan area, but we recommend that trying to spatial represent different levels of potential is too problematic, and should be avoided. However, a perception of historic character is provided by using spatial data generated by</p>	<p>Agreed, and reference to how criteria can support screening for EIA has been included.</p> <p>Noted and thank you. Have removed Figure 43 from VEU 5, and included a reference to the relevant HLA and HSA Characterisations within the justification.</p>

	<p>Historic Landscape Characterisation and equivalent Historic Seascape Characterisation.</p>	
<p>SME 4: Development proposals must demonstrate that: a) Where possible, they are compatible with existing plans, policies and programmes (PPP), especially Shoreline Management Plans, coastal change management areas and Local Development Frameworks/Local Plans. b) They have considered any potentially negative interactions with other sectors, satisfactory negotiation has occurred where they exist, and mitigation agreed where necessary.</p>	<p>Needs to consider what if they are NOT possible</p>	<p>Have removed where possible, and part a) now reads “Be compatible with existing plans, policies and programmes (PPP), especially Shoreline Management Plans, coastal change management areas, Local Development Frameworks/Local Plans and Local Transport Plans.”</p>
	<p>We suggest that as well as identification of potentially negative interactions it is equally important to proactively look for, identify and action potentially positive interactions as alluded to in Policy SME 6 with attention also directed at coastal settlements and associated infrastructure.</p>	<p>Agreed and amended to read: “Consider any complimentary or negative interactions with other sectors, negotiate with these sectors accordingly, and agree mitigation where necessary.”</p>

	<p>The Local Transport Plan should be included in the list of existing plans to be in conformity with.</p>	<p>Agreed and included.</p>
<p>SME 5: Infrastructure necessary to support the sustainable development of marine industry, and associated transport infrastructure, will be supported where consistent with the other policies in this plan.</p>	<p>No comments received</p>	
<p>SME 6: Offshore development should consider complementary opportunities for co-location and sharing of infrastructure.</p>	<p>No comments received</p>	

<p>SME 7: New cables and pipelines in the marine environment should seek to follow existing corridors wherever possible.</p>	<p>As a statutory undertaker with pipelines (in the form of long sea outfalls) shown on Figure 44, we would note that there are many factors which influence the location of such pipelines (for example, proximity to existing assets, hydraulic gradients etc.), some of which may make it difficult to comply with the generalised position put forward by this policy. It would be beneficial to clarify this policy, perhaps by including reference to physical or technical capability without entailing excessive cost (for example - New cables and pipeline in the marine environment should seek to follow existing corridors where physically and technically possible and where this would not incur excessive cost).</p>	<p>Agreed. Have used recommended wording, with the exclusion of excessive cost as it was thought this should not over-ride environmental considerations.</p>
<p>SME 8: Wherever possible, beach replenishment works should ensure use of appropriate resources, which match that which already exist in the natural environment. Works must also have regard to the hydrographical regime of the area.</p>	<p>This policy is about beach replenishment using appropriate resources, which match what already exists. We would agree with the aim of this policy and would be interested to see any evidence that this is deliverable within the licensed dredging areas.</p>	<p>There are examples of this – Swanage beach recharge came from the Swash Channel dredgings. However, the policy is not saying that recharge must come from licensed dredging areas, but that it must match existing natural materials.</p>

<p>SME 9: The operational, management and development plans and other management tools employed by Portland Harbour Authority Ltd and Weymouth Harbour will be supported where consistent with other policies in this plan unless or until this plan is superseded by any statutory marine plan.</p>	<p>Overlooks the significance of the Poole Harbour impacts at the eastern end of the Marine Plan Area. Cross-boundary impacts can be very significant and the opportunity to consider this here has been missed.</p>	<p>Agreed. Have amended to read local ports and harbours. Poole has been mentioned in Justification.</p>
<p>SME 10: Development of infrastructure to support shipping and in particular short-sea shipping as an alternative to road transport will be encouraged and supported where consistent with the other policies in this plan.</p>	<p>No comments received</p>	
<p>SME 11: Development of mussel and scallop cultivation will be encouraged in the areas shown in Figure 49. However, the opportunities identified are indicative, subject to obtaining the required consents, and do not preclude development applications and activities elsewhere.</p>	<p>We are pleased to see that areas for aquaculture have been included and note that this is also in line with European Aquaculture strategy initiatives and reform of the CFP where aquaculture will play a more important role. We have been concerned that the aquaculture industry is still in its infancy and will not have a strong enough voice (or any voice) in marine planning areas to enable these zones to be nominated for mariculture (e.g. the East Coast zone). Is there a process that allows planning of these zones by looking to the future in situations where the industry is not yet developed. How were these Zones decided? Was the aquaculture industry involved?</p>	<p>Yes, we used constraints mapping, as used in Scotland, to identify areas that could potentially be developed in the future. The methods and constraints used can be found in Appendix 9 (as stands) of the marine plan. The aquaculture industry was not directly involved; we used information provided by John Holmyard, New Zealand literature and also drew on previous experience in Scotland. However, we welcome any further advice.</p>

	<p>Could benefit from clearer wording by stating 'subject to obtaining the necessary consents and not prejudicing other development which would otherwise be acceptable'.</p>	<p>Have included this statement. Into the policy.</p>
	<p>Marine biodiversity did not figure in the constraints mapping exercise - we cannot support this as an opportunity area without some assessment of impacts on biodiversity</p>	<p>Agreed and have re-run</p>
<p>REA 1: Recreational activities should conform to existing and future recreational management plans, as identified in Figures 50 and 51.</p>	<p>No comments received</p>	



<p>REA 2: New recreational activities and changes in patterns of use should be monitored and plans adapted accordingly, or new management strategies introduced where necessary, in line with the principles of responsible and safe use.</p>	<p>No comments received</p>	
<p>REA 3: Sensitive seabed features should be protected from the impact of grounding or anchoring by the provision of moorings which minimise detrimental impacts on the seabed.</p>	<p>Fine except that it does not say anything about who is responsible for moorings installation and their costs</p>	<p>This concern has been noted throughout and a section at the start of Chapter 5 (Marine Plan policies) has been added to clarify responsibilities.</p>
<p>REA 4: Installation of new moorings and anchorages which minimise detrimental impacts on the seabed will be encouraged in the areas shown in Figure 52.</p>	<p>Fine except that it does not say anything about who is responsible for moorings installation and their costs</p>	<p>This concern has been noted throughout and a section at the start of Chapter 5 (Marine Plan policies) has been added to clarify responsibilities.</p>

<p>REA 5: Recreational activities which cause disturbance should be avoided in areas important for over-wintering birds, particularly Special Protection Areas.</p>	<p>It is likely that recreational activities are already taking place in over-wintering birds areas i.e. cycling and walking (not investigated for this consultation). We need to be careful that this policy does not serve to prevent development that would help to protect over-wintering birds. In your justification, note is made that the provision of suitable footpaths in these areas may reduce the impact of recreational activities which could also be expanded to shared use footway/cycle-ways. Some modification to this policy should be made to allow mitigation or improvement works that would reduce the impact of recreational activities on over-wintering birds i.e. designated footpaths and cycle-ways with clear signage to discourage wandering from route.</p>	<p>Agreed and suggested wording incorporated into justification. Additionally, policy expanded to include nesting birds, at the request of the T&amp;F Group.</p>
<p>REA 6: Development of infrastructure to support waterborne transport, particularly as an alternative to road transport, will be supported where consistent with the other policies in this plan.</p>	<p>Reflects the policies within the Local Transport Plan and strengthens them with marine ecological protection. I do however have a couple of comments relating to the wording of the justification:  The assertion that all Dorset roads are heavily congested during the summer months is probably a bit too strong. Certain routes at certain times are congested. However, when looking nationally we compare favourably and statements such as this will not encourage sustainable marine development.</p>	<p>Agreed, and wording amended with advice from DCC Transport</p>

	<p>“Roads and related infrastructure cannot cope with the anticipated scale of growth in traffic”. We are currently experiencing a period of sustained reduction in traffic demand related to the temporary recession and recovery and increased fuel costs which are likely to be more permanent.</p>	<p>Agreed, and wording amended with advice from DCC Transport</p>
	<p>“Waterborne transport is not viable however without supporting infrastructure”. This is a very strong statement that upon first reading suggests waterborne transport is not viable. This should be reworded to conform with the WBTS stage 2 study which is a supporting document of the LTP.</p>	<p>Agreed, and wording amended with advice from DCC Transport</p>
<p>REA 7: Improvements to existing marine and coastal access points and the development of appropriately located new ones will be encouraged.</p>	<p>How will ‘appropriately located’ be judged and by whom?</p>	<p>Appropriate has been defined in a footnote as “In this instance, appropriate is defined as not placing an extra burden on existing roads, avoiding designated sites, and not impacting on local amenities.”</p>

	<p>Could be more positively phrased to make a link with terrestrial plans and strategies.</p>	<p>Agreed and policy now reads “Improvements to existing marine and coastal access points and the development of appropriately located new ones will be encouraged where consistent with other policies in this plan and compatible with existing terrestrial plans.”</p>
	<p>It is recommended that Policy REA 7 is delivered in co-ordination with Policies REA 10 and 11.</p>	<p>Agreed, and these are mentioned in the justification and will be electronically linked.</p>
	<p>This policy could potentially be in conflict with others in the plan depending on the development proposed. It is suggested that the statement “where consistent with other policies in this plan” should be included</p>	<p>Agreed and suggested wording included.</p>

<p>REA 8: Developments which remove the physical and psychological barriers that prevent people, including under-represented groups, from accessing and enjoying the coast and marine environment will be supported where consistent with the other policies in this plan.</p>	<p>No comments received</p>	
<p>REA 9: Developments which would threaten the tranquillity and remoteness of the areas highlighted in Figure 53 should be avoided.</p>	<p>Whilst we support the overarching aim of this policy, we feel it should not be used to exclude continued operation or development of necessary infrastructure assets within the policy area (for example, treatment works or pumping stations). We acknowledge that such assets have the potential for minimal localised disturbance during construction and operation which we always seek to minimise. Our choice of asset location may be constrained by many factors (such as proximity to source, location of existing infrastructure, environmental designations etc.), necessitating the continued use, development or extension of existing assets within the area highlighted in order to continue to provide essential sewerage and water supply services to our customers.</p>	<p>Agreed, and wording changed to 'New developments which would threaten the tranquillity and remoteness of the areas highlighted in figure 20 should be avoided. New and existing operations that are necessary to provide essential services should consider mitigation measures to reduce the impact of development, and are encouraged to consider noise emissions when replacing old equipment.'</p>

	<p>This should be reworded to allow for mitigation measures to reduce the impact of development on remoteness and tranquillity.</p>	<p>Agreed, and wording changed to 'New developments which would threaten the tranquillity and remoteness of the areas highlighted in figure 20 should be avoided. New and existing operations that are necessary to provide essential services should consider mitigation measures to reduce the impact of development, and are encouraged to consider noise emissions when replacing old equipment.</p>
<p>REA 10: Developments or activities which may increase visitor numbers should consider their effect on remote, tranquil and ecologically sensitive coastal areas and preferably target locations in established 'honeypot' areas as outlined in the AONB and JCWHS management plans.</p>	<p>No comments received</p>	<p>T&amp;F Group felt the policy needed to specify that this applies to new developments and activities, and wording amended: "New developments or activities which may increase visitor numbers should consider their effect on remote, tranquil and ecologically sensitive coastal areas and preferably target locations in established 'honeypot' areas as outlined in the AONB and JCWHS management plans."</p>
<p>REA 11: Developments which are likely to increase visitation to the Marine Plan Area, or could potentially increase local recreational use of the area, should consider the capacity of existing terrestrial infrastructure; particularly that set out in Figure 54. Where satisfactory mitigation cannot be achieved, such developments should be avoided.</p>	<p>We welcome the inclusion of infrastructure (in particular related to sewerage facilities) in policy REA11. Consideration could be given to including reference to inclusion of Sustainable Urban Drainage Schemes (SUDS) in proposed developments to minimise impacts both to the sewerage system and via surface runoff direct to streams. This may help to reduce diffuse pollution entering the inshore marine environment.</p>	<p>Agreed and reference included.</p>

	<p>What happened to the Swanage sewerage treatment plant? You show an outlet.</p>	<p>This was a mapping issue, one icon covering another. Has been corrected.</p>
	<p>We have a number of comments on the justification and wording of this policy which are set out in the bullet points below:</p> <p>Justification Para 2 - “Severe congestion and delays”. Whilst there is congestion and delays on the approaches to the marine plan area, there have been a number of transport improvements put in place since the previous summer season and the effect of which is yet to be known. Modelling suggests that there will not be severe congestion and delays. Also, when comparing the congestion felt in Dorset to that across the country, the congestion we face is far from severe, which we should bear in mind as developers will be comparing Dorset with other potential locations.</p>	<p>Agreed, and wording amended with advice from DCC Transport</p>

	<p>“four Air Quality Management Areas” There are two AQMAs in Dorset (excluding the South East Dorset conurbation) which are in Chideock and Dorchester. These are the responsibility of the district councils and further information from them may be required.</p>	<p>Acknowledged, reference to AQMAs removed.</p>
	<p>The statement within the policy “particularly that set out in figure 54” must be removed. There are many existing locations of specific transport issues that are not present on this map. The figure itself is essentially the major infrastructure in the plan area and bears no relation to specific transportation issues. Unless the figure is redrafted highlighting known transportation problem areas the statement and figure should be removed from the plan.</p>	<p>Agreed. Included traffic hotspots provided by the DCC Transport Planning team into Figure 54, and reference to the LTP within the justification.</p>
<p>Objective 5</p>	<p>It is important that ambition of this objective (i.e. ‘...to take advantage of the opportunities presented by coastal and climate change...’) as addressed by policy CAM 6 is also supported by relevant policies within Objective 3.</p>	<p>Agreed; the T&amp;F Group felt that these are sufficiently supported.</p>



<p>CAM 1: Development proposals should aim to minimise greenhouse gas emissions over the lifetime of the development, with a view to achieving net reductions in emissions overall and in relation to specific developments wherever possible.</p>	<p>The marine environment is likely to be hit hard by increased CO2 - both ocean warming and ocean acidification are likely to lead to significant changes</p>	<p>Agreed. Have included ocean warming within justification.</p>
<p>CAM 2: Renewable energy developments, including small-scale and pilot schemes, in the marine and coastal environment will be supported wherever consistent with the other policies in this plan.</p>	<p>You haven't mentioned algal biomass - recent report from CE suggests this is worth some further research</p>	<p>Agreed and included in justification. This also creates a link with policy SME 6.</p>
<p>CAM 3, CAM 4 &amp; CAM5</p> <p>CAM 3: Developments which span the inter-tidal zone, or have a terrestrial landing-point, should aim to work with natural marine and geomorphologic processes. Coastal flooding and erosion risk should be considered and relevant plans consulted.</p> <p>CAM 4: Developments which span the inter-tidal zone should take account of</p>	<p>Page 123, 124 and 126. Should the bullet lists on these pages that set out which policies the marine plan policy complies with not also include the "Durlston Head to Rame Head Shoreline Management Plan June 2011" in these lists?</p>	<p>Agreed and included.</p>

<p>relevant coastal change policies as set out in Local Plans, Shoreline Management Plans and beach management plans. In addition, particular regard should be paid to the need to protect the Outstanding Universal Value of the Jurassic Coast World Heritage Site as set out in its Management Plan. Refer to Figure 55.</p>		
<p>CAM 5: Coastal and offshore developments should consider the potential impacts of climate change and incorporate adaptation strategies into their plans.</p>	<p>Expects organisations to incorporate adaptation strategies into their plans. Does this include the adaptation strategies which arise for other adjacent areas/activities? Over what timescales?</p>	<p>No, this policy is recommending that developments create their own adaptation strategies. Agreed 'incorporate' may imply other adaptation strategies, so have changed it. Also have given a timescale. Now reads: Coastal and offshore developments should consider the potential impacts of climate change and build long-term adaptation strategies into their plans.</p>
	<p>Justification; farmed non-native species could naturalise <i>Crassostrea</i>, <i>Tapes philippinarum</i>, <i>Undaria</i> so far</p>	<p>Agreed, but don't think this will add anything to the policy or justification.</p>

<p>CAM 6: Developments or activities which enable communities and businesses to take advantage of opportunities that may arise from climate or coastal change will be supported where consistent with the other policies in this plan.</p>	<p>No comments received</p>	
<p>SS 1: Development and activities within the Marine Plan area will recognise and respect the strategic importance of the MoD firing ranges and training facilities.</p>	<p>No comments received</p>	
<p>SS 2: Efforts to minimise potential spatial conflicts between military and other uses of the Marine Plan area, and finding mutually beneficial use of space, will be encouraged.</p>	<p>Reference to 'potential spatial conflicts' is ambiguous and will not be clear to users of the plan. This may need to be more clearly set out in terms of what type of conflict the policy is concerned with.</p>	<p>The T&amp;F Group felt that the justification was clear in the types of conflict that might exist and that no changes were necessary.</p>

<p>SS 3: Developments or activities which impede major navigational routes to and from Weymouth and Portland Harbours, impact on port security or restrict access to, and use of, safe anchorage zones should be avoided.</p>	<p>No comments received</p>	
<p>SS 4: Development that provides or enhances UK energy security will be supported where consistent with the other policies in this plan.</p>	<p>No comments received</p>	
<p>Objective 7</p>	<p>General: Yes I agree. Education will be constantly needed to ensure maximum buy-in is achieved both locally and nationally through the visitors that come to Dorset over the longer term.</p>	<p>Noted.</p>

<p>VEU 1: The design and scale of marine and coastal development should be appropriate to its setting and should not detract from the character of the area as defined within the Dorset Landscape and Seascape Character Assessment 2010.</p>	<p>No comments received</p>	
<p>VEU 2: Offshore development within 'Coastal Waters' seascape character areas should be avoided unless there are reasons of overriding national importance for its location, and a lack of alternative sites.</p>	<p>From our prospective these policies are very important and we offer the comment that delivery of policy VEU 2 should also be informed by determining local acceptance of change or how change might be considered acceptable.</p>	<p>Agreed, have included reference to determining levels of acceptable change within the justification.</p>
<p>VEU 3: Development or activities must respect the purpose of international and national cultural heritage designations within the marine and coastal environment and contribute to their enhancement where possible.</p>	<p>In the policy list under VEU 3, please split the second bullet point.</p>	<p>Agreed and done.</p>

<p>VEU 4: Development in the marine and coastal environment should take account of cultural heritage sites and areas of archaeological interest as well as their settings. Opportunities should be taken to enhance these assets where possible.</p>	<p>Is also compliant with the UK Marine Policy Statement</p>	<p>Agreed and included.</p>
<p>VEU 5: Early engagement with English Heritage the Dorset Historic Environment Record keepers, and JCWHS team is required for any development which may disturb heritage assets. Refer to Figures 59, 60 and 61.</p>	<p>You may wish to also reference 'Conservation Principles' published by English Heritage in 2008 (please see: <a href="http://www.englishheritage.org.uk/professional/advice/conservation-principles/ConservationPrinciples/">http://www.englishheritage.org.uk/professional/advice/conservation-principles/ConservationPrinciples/</a>).</p>	<p>Agreed and referenced in justification.</p>
<p>VEU 6 &amp; 7</p> <p>VEU 6: Developments and activities which encourage public engagement in, and understanding of, the heritage assets of the Dorset coast and marine environment will be supported.</p> <p>VEU 7: Developments which enhance the fabric, and public interpretation, of cultural assets with maritime</p>	<p>Page 143: We suggest the plan should recognise the role that contemporary culture plays in valuing the natural and cultural heritage. This also gives a connection with the plan's objectives for the Green Knowledge Economy, especially the Creative Industries. A good example of this is the refurbishment of Durlston Castle.</p>	<p>Agreed and included in justification</p>

connections will be supported.	<p>Says these will be supported, but without any reference who supports and who pays. There are several policies which use words like 'encouraged' and 'supported' but suggestion of by whom, over what timescales, at what costs.</p>	<p>This concern has been noted throughout and a section at the start of Chapter 5 (Marine Plan policies) has been added to clarify responsibilities.</p>
	<p>VEU 7 should also support delivery of other policies that look to optimise re-development programmes in support of coastal community economic development (e.g. CAM 6 and SD 2).</p>	<p>Agreed and reference made in justification</p>
Objective 8	<p>General: should perhaps have been Objective 1 because it makes clear the necessity for the plan to integrate with relevant statutory plans and designations as well as the non-statutory ones such as SMP2 for example.</p> <p>The reference to an appropriate assessment of risk in this objective is important given the mention of limits in Objective 3.</p>	<p>Noted, but Group felt it was best left as Objective 8.</p> <p>Noted</p>

<p>SD 1 and SD 2</p> <p>SD 1: Competent and relevant authorities will be encouraged to collaborate to provide an integrated approach to the protection, enhancement and sustainable use of the marine environment.</p> <p>SD 2: Regular and on-going liaison will be encouraged between marine and terrestrial planners to ensure policy implementation is aligned for developments which take place in the coastal zone, particularly in the context of formal reviews of terrestrial and marine spatial plans.</p>	<p>These could also refer to liaison in the preparation of plans and strategies (i.e. not just a matter for implementation).</p>	<p>Agreed and included in the policy.... “Competent and relevant authorities should collaborate to provide an integrated approach to policy development and the protection, enhancement and sustainable use of the marine environment.”</p>
	<p>SD1 &amp; 2 – these policies could be strengthened i.e. will be encouraged could be reworded to should. It is also suggested that the word competent is removed from SD1.</p>	<p>Agreed. Now changed to should (see above). Footnote added to explain meaning of competent.</p>
<p>SD 3: The collection of appropriate data necessary to provide a robust evidence base for future decisions affecting the marine environment, and further iterations of this marine plan, will be encouraged.</p>	<p>Encouraged’ How?</p>	<p>This concern has been noted throughout and a section at the start of Chapter 5 (Marine Plan policies) has been added to clarify responsibilities.</p>



	<p>What is the appropriate data? And what happens if the collection methods are in conflict with other policies.</p>	<p>Data will be appropriate to the requirements of each marine plan and its iterations...</p> <p>Justification for SD 4 now includes reference to using standard methods and to ensure data gathered is compatible with existing data sets.</p>
<p>SD 4: Organisations working in the marine and coastal environment will be encouraged to work in partnership to ensure data are compatible and to maximise information-sharing between the private and public sector, with local expertise and knowledge being used wherever possible to contribute to quality data gathering and scientific studies.</p>	<p>Part of ensuring compatibility and effective partnership working is working to common standards when data gathering so that data can be used for purposes other than those they were collected for, and information sharing before any data collection to allow for collaboration or change in specification</p>	<p>Agreed and included in justification</p>
	<p>Consideration should also be given to optimising other programmes of locally held and maintained data resources, such as the Historic Environment Record maintained by Dorset County Council. However, it is also important to consider how co-ordination of information resources (and facilities and equipment) might be enhanced with other key partners such as the local Inshore Fisheries and Conservation Authority (IFCA).</p>	<p>Agreed and included in justification</p>

<p>Should we keep the aspiration for the plan to be a material consideration?</p>	<p>The first paragraph suggests that the marine Plan being developed for Dorset waters is in some way an interim measure before the 'real' plan is produced. This seems misleading for whilst the C-SCOPE outputs will clearly help to inform any future MMO-led plan...that was never a direction laid down in the original bid or project brief.</p> <p>The statement regarding the aspiration that the C-SCOPE marine plan should become a material consideration in local planning requires further explanation. For example, an action plan should set out what is necessary to achieve this aspiration post June 2012.</p> <p>Some further thought now needs to be given to how best to embed this pilot plan into local awareness, planning and development agencies, authorities and local commerce.</p> <p>General concerns regarding aspirations.</p> <p>Our ongoing concern remains and is reinforced by the recent aspiration that has transpired that “the C-SCOPE Marine Plan will become a material consideration for local planning and regulatory authorities when making decisions on new applications for development and eventually be given some statutory recognition through incorporation into local plans and national marine plans when they are developed”</p> <p>The primary reason for our concern is as follows:</p> <ol style="list-style-type: none"> <li>1. the C-SCOPE plan is non-statutory plan that has been developed in the absence of experience of the successful delivery of the first statutory marine plans.</li> <li>2. the C-SCOPE plan has been developed in the absence of a statutory and legal framework that provides for proper consultation and stakeholder</li> </ol>	<p>This aspiration is not included in the final marine plan. Although the T&amp;F Group felt that as the plan had been conducted and assessed through the SA and consulting processes, in a manner that would enable it to be a material consideration for local planning and regulatory authorities should they choose to do so.</p> <p>1. Agreed, the plan was developed ahead of statutory marine plans.</p> <p>2. Agreed to an extent; as a non-statutory plan, it was not subject to the legal framework. However, the plan was developed using best-practise and stakeholders were involved at every stage of the process; they were given the opportunity to examine the evidence base, contribute</p>
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	<p>scrutiny, objection, inquiry, challenge, appeal and judicial review.</p> <p>3. its ability to strike a fair balance is unfortunately compromised by a lack of representation on the steering and working groups from parties with economic interest. This could be for a variety of reasons and may for example be that many parties reserve their efforts for the development of statutory marine plans or may not see the benefits of being involved in the development of plans and suffer the consequences after.</p> <p>With the above in mind, <b><u>we do not support</u></b> CSCOPES aspiration for this plan to be a material consideration for local planning and regulatory authorities or, for it to be given some statutory recognition through incorporation into local plans and national marine plans.</p>	<p>to policies and challenge such policies through both the T&amp;F Group and the SA workshop. The plan was also put out to a three month consultation.</p> <p>3. Agreed, some industries were not present on the Steering Group and T&amp;F Group. The reasons given are probably correct; this has also been highlighted in the end of project key messages document. However, in addition to the working groups, face-to-face or telephone interviews were conducted with the British Chamber of Shipping, MoD, Sunseeker, renewable energy representatives and British Marine Aggregates Producers Association.</p>
<p>Should we be allocating more space and/or restricting development in certain areas?</p>	<p>In 3.3.3 useful commentary was provided regarding spatial analysis of human activities and in particular the identification that many activities were ‘neutral’ interactions. Such information is important considering the definition of marine planning used in section 2.1 (second paragraph). In particular, if it was found that marine planning is not specifically about the allocation of space; what then is its purpose and how might its purpose be defined?</p> <p>The final map should be one which identifies the summation of the various maps and policies by identifying areas where for example development is acceptable/encouraged/supported and others where in the interests of ecosystem services sustainability no development can take place. Similarly such a map could identify areas where ecosystem services are best protected by seasonal variation in other activities.</p>	<p>This is a challenging and one which the project officers continuously reviewed. However, over the course of the project it became apparent that we have few resources to allocate space to (especially once the specific location for the Navitus Bay windfarm site was chosen), and few interactions which require management. The plan does highlight potential space for aquaculture, which was one of the few practicable resources in the area (although it is not specifically reserved for this activity).The stakeholder group were happy with the approach taken, and believed that specific allocation of space would be too rigid; flexibility being one of their criteria for the marine plan. Maybe a different pilot area could have been chosen, and it could perhaps be argued that the marine plan wasn’t necessary if there is little pressure in the area... These lessons will be fed back to other marine planning practitioners.</p>

<p>Should we word some of our policies more strongly?</p>	<p>One criticism of the plan is that many of the policies are openly worded and tend to read more as ambitions rather than “SMART” policy statements.</p> <p>A number of policies include phrases such as ‘where possible’. It would be preferable to avoid this as it might weaken the policy or could be deemed unclear as to when a developer might be expected to comply.</p>	<p>Noted. Consulted with DCC planning team and have strengthened several policies as a result.</p>
<p>Should we include a new policy on sewerage and waste water?</p>	<p>We believe that inclusion of a policy outlining support for the appropriate development of sewage treatment &amp; water supply infrastructure is therefore warranted... Suggested wording of such a policy may be in terms of the wording suggested below, or as an addition to policy HME 8:</p> <p>“Applications for new sites, extensions or development to existing sites required to transport or process sewage and waste water will be permitted providing that they do not give rise to significant adverse affect to marine or other environmental features, local amenity or landscape”.</p>	<p>Thank you for raising this. A new policy which covers essential public services has been included under objective 3: “SME 5: Applications for new sites, extensions or development to existing sites required to deliver essential public services will be supported providing that they do not give rise to significant adverse affect to marine or other environmental features, local amenity or landscape. The need for access to existing infrastructure for emergency repairs and statutory maintenance should be recognised.”</p>

**Table 8: Responses and replies to the question “Do you agree with the suggested indicators set out in Appendix 14? Do you know of any further monitoring regimes within the C-SCOPE Marine Plan area, or can you suggest further indicators?”**

Comment	Response
Under Mariculture there could be an indicator for number of aquaculture businesses as per number of fishing vessels or production tonnage from aquaculture rather than sea fisheries.	Agreed and included
There are 98 indicators listed in the Appendix but 17 (17%) of them are not actually monitored. The list appears comprehensive and so rather than attempting to find new indicators, it would be better to activate those on the list that are not being used at present.	Noted.
The use of indicators, to be monitored by the Dorset Coast Forum, is welcomed. The proposal to reduce these in number to 40 or less is sensible, as the time taken to monitor nearly a hundred indicators would be significant, even if the data are collected and analysed by existing organisations.	Noted
<p>We believe further clarification may be required on the following indicators:</p> <ul style="list-style-type: none"> <li>● Biodiversity, flora and fauna – within CSCOPE, the statement is made that an onshore terrestrial boundary is not defined. It is therefore unclear how you intend to measure these indicators without setting a clear terrestrial boundary?</li> <li>● Waste &amp; Water Quality – Proportion of coastal water bodies achieving good ecological status by 2015 under the Water Framework Directive – this is probably best represented as an ongoing target as the life of the CSCOPE plan extends beyond 2015</li> </ul>	
One indicator which doesn't appear to have been included is changes in terrestrial land-use in agricultural areas where surface runoff will vary with changes in for example changes from pastoral to arable and may have impacts of suspended sediments, pollutants, etc. Probably not critical here, but in areas such as E Devon could be locally critical. Again I'm thinking of transferability of methodology.	
To help refine the list of indicators to those which are most useful it would be helpful if they were set out in a table against the policies that they are intended to monitor.	Agreed and this has now been done for the final indicators.
We noted the inclusion of programmes such as 'Heritage at Risk' and we have no further comment to offer.	Noted.

<p>Suggested transportation indicators within Appendix 14:</p> <ul style="list-style-type: none"> <li>● Proportion of journeys taken by public transport;</li> <li>● Volume of traffic on major coastal roads; and</li> <li>● Number of passenger ferry passengers departing from Weymouth - St Malo / Channel Islands.</li> </ul> <p>These indicators are coarse and may not serve to help with measurement of the impacts of the plan. Further work is required to refine these indicators to specific route and services where marine development is likely to have an impact and the effect of the plan can be more accurately measured. Transport Planning Group can assist with this.</p>	<p>Noted and consulted with DCC transport planning team to identify suitable indicators.</p>
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**Table 9: Responses and replies to the question “Do you have any comments on the C-SCOPE Marine Plan Sustainability Appraisal and Habitats Regulations Screening Assessment?”**

<b>Comment</b>	<b>Response</b>
<p>Chapter 3 of the Sustainability Appraisal (SA) report identifies ‘targets’ for the protection of underwater cultural heritage and we must ask for clarification regarding what these targets comprise and who set them</p>	<p>In this case it is referring more to ‘principles’ than targets, so we are referring to those contained within the UNESCO Convention on the Protection of the Underwater Cultural Heritage and the 1992 Valetta European Convention on the Protection of the Archaeological Heritage.</p>
<p>Section 4.2 doesn’t seem to provide any information about ‘seascape’</p>	<p>Agreed and now included.</p>
<p>Section 4.3 (geology) includes summary detail about waste water discharge which should be in section 4.6.</p>	<p>Agreed and moved.</p>
<p>Section 4.11 mentions four protected wreck sites, presumably this captures sites in the wider marine environment adjacent to Dorset rather than specifically within the marine plan area</p>	<p>This is correct; there are no protected wreck sites within the C-SCOPE Marine Plan area, but it was felt that they were worth mentioning in the wider context.</p>
<p>Section 6.1.2 mentions mitigation, but in terms of landscape and seascape which describes character, how is the principle of mitigation applicable?</p>	<p>There is no mitigation proposed for seascape other than addressing /recognising the cumulative effect on seascape. Agree that mitigation for landscape and seascape is a difficult concept; ensuring development doesn’t conflict with the character as set out in policies VEU 1 and 2 are probably the best mitigation.</p>
<p>Section 6.1.3 describes commercial marine minerals resources which should be described separately from a general description of geological and geomorphological features</p>	<p>Agreed and now within section 6.1.9, Economy and Material Assets</p>

Perhaps 6.1.11 could examine if other proposed projects in the area (e.g. 'wreck to reef') might actually relieve visitor pressure on other seabed wreck sites.	This would be a different assessment, in this section we are trying to indicate what the situation will be without the plan in general terms.
Table 9.1 (cumulative impact assessment matrix) requires re-examination (re 'protection of the historic environment') with regard to positive factors which should be achievable, subject to delivery of policies TCC 4 and VEU 4 (see also the C-SCOPE SA Framework table).	Agreed, sympathetic development and restoration of historic environment could create potential positive effects on employment and social deprivation in the long term. Amended accordingly.
Table 11.2 also requires attention in that 'protection of the historic environment' should also include under 'effect' wider community support and visitor access to, enjoyment of and understanding about the historic environment with the monitoring indicator list to include the Heritage at Risk programme.	Agreed, and now included.

**Table 10: Responses and replies to the question "We envisage much of the content of this consultation document being appended to the final C-SCOPE Marine Plan to ensure that the Plan is succinct and accessible as possible. Do you agree with this approach? Of the following, which elements do you think should be retained in the final version and which could be retained as appendices?"**

	Retain in final version		Comments
	yes	no	
<b>All sections</b>			<p>Retain all because most readers will not necessarily understand the context in its entirety but rather are familiar with parts of it. Applies to all.</p> <p>All of the identified sections should be included in the final plan, each of these serve to work together to create a document that flows well and has all of the relevant information included that support the policies devised. Rather than remove important sections for the final document, an executive summary should be provided.</p> <p>We suggest that the Introduction, What is Marine Planning, International Policy Context, Marine Planning in England, Purpose and Status of the Marine Plan, Overview of the C- SCOPE Marine Plan and Indicators , Monitoring and review are useful to keep in the main plan.</p> <p>Yes, but it is important that clarity and logical structure are maintained with sufficient detail maintained within the 'core' text of the marine plan. The focus for attention should be to provide adequate explanation of the policies and interactions between the policies to support delivery.</p>
<b>Introduction</b>	8	0	<p>Essential</p> <p>Yes include in main part of plan</p>

<b>What is marine planning?</b>	7	1	Essential Include this detail in the 'introduction'
<b>International policy context</b>	7	1	Necessary in order to place this plan in the context of what has been done so far in other countries in order to achieve a degree of commonality of direction  Yes, but merge 'national policy context' with 'Marine planning in England'
<b>Marine planning in England</b>	6	2	This can best be viewed as background and scoping material  See above
<b>Purpose and status of the marine plan</b>	7	1	The fact that this is a non-statutory plan can make a great deal of difference to its uptake and usage. It has to be embraced by planners and developers willingly and then as material consideration in their work  Yes include in main part of plan and merge with 'process for producing' Add section - plan policies  Essential for non expert or casual reader. The Plan should be attractive to appeal to all stakeholders in Dorset
<b>Starting points for the marine plan</b>	3	5	This is background and scoping material  The Dorset perspective explained. A local "Charting Progress" document.  Move to appendix if this explains EU funding for the project, but if it is more detail about policy context then merge with other sections  The sections on Starting Points for the C-SCOPE Marine Plan and Process for producing the Plan could be moved to an Appendix.
<b>Process for producing the marine plan</b>	5	3	As above  The 'How'  See above  The sections on Starting Points for the C-SCOPE Marine Plan and Process for producing the Plan could be moved to an Appendix.



<b>Overview of the marine plan area</b>	8	0	<p>Good context and explains why this particular sea area was selected and why it constitutes a suitable area for plan piloting</p> <p>The local context is a large section but very important. Is the most appealing section giving a “Where are we Now” perspective from which the next section provides future assessments against a range of indicators.</p> <p>Yes, but consider what thematic information (e.g. fishing, shipping etc) could be included in appendices</p>
<b>Indicators, monitoring and review</b>	4	4	<p>Needed as corroborative information and truthing. Germaine to the final outputs but need only be available to the reader of the final document as an appendix.</p> <p>This is of less appeal to the casual and non expert reader.</p> <p>Yes include in main part of plan</p>

Responses indicated that all elements except the starting points and indicator sections should be retained. In line with this, the indicators will be available as an appendix. However, the project team felt that the starting points section was necessary and has been retained.

**Table 11: Responses and replies to the question “Please make any other comments you have on the Draft C-SCOPE Marine Plan.”**

<b>Comment</b>	<b>Response</b>
The use of maps and diagrams makes this heavyweight document more attractive readers. Pictures are worth a thousand words. As such the mapping provides the spatial context which the reader will immediately recognise. As such some of the evidence supporting the strategy at the “operational level” is best placed in Appendices.	Noted, but retained.
Some further thought now needs to be given to how best to embed this pilot plan into local awareness, planning and development agencies, authorities and local commerce.	Agreed, this is being addressed within DCF/DCC but will not be included within the marine plan.
Contents page – please put hyperlinks from content line to page throughout – makes it much easier to read	Agreed, this was always the intention for the final plan and is now done.
The document is very large – at present it is downloaded as two separate large documents with appendices saved as individual files. This makes cross referencing the document whilst reading it difficult. A low resolution file which contains the whole document would be helpful (also for those who have older computers). Also, hyperlinks to appendices referred to in the main document would enable you to access them quickly and more easily.	Agreed, this was always the intention for the final plan and is now done.

<p>A summary of the document to outline the breadth of the document and key policy areas would be helpful.</p>	<p>Agreed, executive summary now included.</p>
<p>Treatment of waste water and sewage is a distinct area of waste policy. As acknowledged within the Plan, industrial &amp; domestic properties within the plan area will produce waste water which requires safe treatment before being released back into the environment. Responsibility for the provision of sewage treatment facilities and infrastructure within the plan area is within the remit of Wessex Water.</p> <p>Wessex Water enjoys Permitted Development Rights under the General Permitted Development Order 1995 (as amended) which enable the company to undertake some development (normally involving plant or machinery on operational land and laying new or repairing existing sewers) without the need to gain planning permission. However, the company will require planning permission for new or extended sewage treatment works or buildings.</p> <p>During the period of the plan, it is envisaged that the need for further improvements and extensions (or new infrastructure) could be required to meet enhanced treatment standards, provide additional capacity to meet customer demand and/or replace life expired assets. Provision of such infrastructure (as indicated in the plan) is critical to meeting national public health and environmental commitments.</p> <p>We believe that inclusion of a policy outlining support for the appropriate development of sewage treatment &amp; water supply infrastructure is therefore warranted, subject to conditions relating to national policy and environmental protection (such as policies HME1, 2 &amp; 3 etc.). Such a policy would contribute to the sustainable management of infrastructure development necessary to maintain an integrated and adequate network of sewage treatment and water supply capable of meeting the demands of future development and population whilst safeguarding the environment.</p> <p>Suggested wording of such a policy may be in terms of the wording suggested below, or as an addition to policy HME 8:</p> <p>“Applications for new sites, extensions or development to existing sites required to transport or process sewage and waste water will be permitted providing that they do not give rise to significant adverse affect to marine or other</p>	<p>Agreed and new policy, SME 5 has been included.</p>

environmental features, local amenity or landscape”.	
There are a lot of typos and inconsistencies which will need to be purged from the final document.	Agreed. Vince May kindly offered to proof read final document.
This is an impressive document and provides a good basis for marine spatial planning. However, it does not yet meet its objective of taking an ecosystem approach. This requires data which describes the ways in which this ecosystem functions. At the moment we have spatial information about what is where and what conflicts spatially. We do not have quantified information about the processes which drive those spatial patterns. This is not specific to marine spatial plans, but applies to all spatial plans which give us formal spaces and area uses.	Agreed, and a big challenge to future marine planning!
Sensitivity maps: Some of the maps are essentially meaningless as all the habitats are scored as not assessed, not sensitive or not exposed. In some cases it may be worth changing the benchmark to something that would show a more meaningful result, though you’d then have to re-assess the scores. There’s no intertidal data included but we have enough info to add this – would not show up terribly well on the maps, but that’s a presentation issue. In some cases the maps are over-simplified – the broad habitat scores show the high end of a range, really need to drill down into this to make the maps mean anything – the more sensitive sub-feature may be widespread or non-existent. In many cases there is enough data to map some of the sub-features, should make use of this where we have it.	Agreed, although it was highlighted in the draft that this was work in progress. This issue was discussed by the T&F Group, and agreed to work with DWT further to improve the maps.
One criticism of the plan is that many of the policies are openly worded and tend to read more as ambitions rather than “SMART” policy statements. This is not to say the document does not achieve its aim to “provide users, managers and regulators of the marine plan area...with direction, policies and advice to ensure their plans and activities contribute to sustainable development in the area.” As a non statutory document it provides a useful steer for those involved with using or managing the marine/coastal area. However, to give the document more weight it may need to “smarten up” its policies or make clearer reference to statutory policies affecting particular issues / areas.	Agreed. Consulted with DCC planning team and have strengthened several policies as a result.
A number of policies include phrases such as ‘where possible’. It would be preferable to avoid this as it might weaken the policy or could be deemed unclear as to when a developer might be expected to comply.	Agreed, this was a challenge within the marine plan process. The Sustainability Appraisal raised these issues and, as always, some sectors wanted policies softened, and others strengthened. Reviewed and have removed in some instances.
It would add weight to the plan to highlight those issues that it is considered important that Local Plans/Local Development Frameworks should address. By doing this it will give more weight through the statutory planning framework to these issues.	Agreed. This concern has been noted throughout and a section at the start of Chapter 5 (Marine Plan policies) has been added to clarify responsibilities.

<p>It would also help to highlight the policy statements in bold so they stand out clearly from the supporting text.</p>	<p>Agreed, this was a formatting error, now addressed.</p>
<p>Section 2.3 does acknowledge uncertainty in the planning process e.g. the implication of the Localism Act 2011, but it is understood that certain aspects of this Act, e.g. neighbourhood plans are now in active development (<a href="http://www.planningportal.gov.uk/inyourarea/neighbourhood/">http://www.planningportal.gov.uk/inyourarea/neighbourhood/</a>), it is therefore suggested that the Dorset marine plan might be particularly helpful in testing how town and parish councils might be informed by or influenced by marine plan policies and objectives. Similarly, attention to Local Development Orders and the identification of Enterprise Zones would be very helpful and how such initiatives might benefit from interaction with marine planning and at what geographical scale are the yields likely to be maximised (i.e. is the size of the area selected for the Dorset marine plan appropriate given changes to planning delivered by the Localism Act).</p>	<p>Agreed, it is hoped that lessons can be learned with regards to the Localism Act 2011, further work will be needed in this area in the future.</p>
<p>In the glossary the definition of ‘marine litter’ could be expanded to explain how particular materials involved are considered hazardous (e.g. plastics).</p>	<p>Noted, but felt not necessary.</p>
<p>We strongly recommend that the Dorset Cultural Partnership is included as a consultee in the development of future plans, and that the reference documents include:</p> <ul style="list-style-type: none"> <li>● Dorset Cultural Strategy 2009-2014</li> <li>● WHS Jurassic Coast Arts Strategy 2006-2013</li> </ul>	<p>Agree and referenced.</p>
<p>With regard to birds, it should be noted that the BMC has a great deal of experience with the negotiation of restrictions for cliff nesting birds and we are as much a conservation organisation as we are about access. There are quite a few restrictions already in place along the climbable cliffs of Swanage and Portland and the situation is pretty stable, however if nesting locations change we’re able to react quickly and alter the agreed restrictions following negotiation with local rangers. The BMC’s policy is to only agree restrictions based on evidence of nesting birds rather than precautionary restrictions and they all follow a “least restrictive option” approach (ie a minimal restriction which still affords the birds the space they need to successfully nest). I don’t foresee any major issues cropping up in the near future but if you ever need to discuss revised or new restrictions please feel free to get in touch with me.</p>	<p>Noted and thank you.</p>
<p>One thing I did not mention in my response was the repetition of the maps in parts 1 and 2. It dawned on me (literally) that perhaps Chapter 5 needs maps which show where the policies should apply, where 'exclusion zones', such as the 'Offshore danger area' whilst restricting some activities, have had the effect of aiding marine conservation. The final map should be one which identifies the summation of the various maps and policies by identifying areas where for</p>	<p>Noted. This was discussed at great length by the T&amp;F Group (including the originator of this comment) and it was agreed that with the current available data and limitations of seabed habitat maps, this approach was not possible. T&amp;F Group remain happy with the format of the plan.</p>

<p>example development is acceptable/encouraged/supported and others where in the interests of ecosystem services sustainability no development can take place. Similarly such a map could identify areas where ecosystem services are best protected by seasonal variation in other activities. This might for example disallow any seabed disturbance during spider crab migrations.</p> <p>Without a spatial expression of the policies, I don't see how this can easily be described as a marine spatial plan. Not an easy task and likely to be very controversial and might be approached by having a trio of exemplar areas where the data to support an ecosystems approach IS available. The great advantage of having all this information in digital format is that the boundaries can be changed, for example, seasonally to meet the ecosystem dynamics. I am not convinced that this has been given sufficient attention.</p> <p>Sorry to sound negative about what is as I have already said is a very impressive piece of work, but these days policies, actual economic activities change quite rapidly that static spatial plans can be seen as ossifying rather than stimulating development which is both sustainable and adaptive.</p>	
<p>Transport Planning Group requests that you liaise on these comments and revisions to the document before it is finalised. Previous comments submitted for the Dorset Coast Strategy received no response and the final document was published without further Transport Planning involvement. Rewriting the transportation infrastructure section for the final plan should be undertaken in close liaison with Transport Planning Group.</p>	<p>Noted and will ensure communication remains open. The Strategy revisions were sent to the Transport Planning Group DCF member, but the document wasn't distributed to the originator of this comment.</p>
<p>Aspects of the CSCOPE project that in our view add value and are supported by us, include:</p> <ol style="list-style-type: none"> <li>1. The gathering and sharing of information and the efforts that have been made to make information more widely accessible to practitioners and the general public. iCoast, an output designed to give locals and tourists access to coastal and marine information, encouraging sustainable use of the coast is in our view impressive.</li> <li>2. The developing of a GIS-based tool (Coastal Explorer Planning) for planners, developers and other decision makers shows similar potential.</li> <li>3. We also recognise this process of preparing a marine plan offers those involved an opportunity to learn noting that statutory marine plans planned by the MMO do not currently exist. There is useful information in the resulting CSCOPE plan that provides readers with an informative briefing on the locality and a starting point to ongoing discussion whatever those discussion might be.</li> </ol>	

**We support** the aims of the Dorset Coast Forum and CSCOPE where it serves to encourage dialogue sharing and availability of information.

#### General feedback on CSCOPE plan

As a general feedback suggestions are included below as follows:

- i. a review of the users, managers and regulators accompanied by a discussion of their roles and responsibilities and how this plan relates to each group is required.
- ii. a review of sectors that describes the basic facts that relate to a given sector and its role in society is required without introducing discussion of impact. This review should be further incorporated into (i) above noting that sectors have more than one role e.g. local authorities, Environment Agency, commercial ports and harbour authorities, landowners etc.
- iii. a systematic review of legislation is required that:
  - a. teases out those bits of legislation that relate to decision-making by users, managers and regulators accompanied by suitably worded policies that mirrors and compliments existing legislation.
  - b. identifies gaps in legislation where suitably worded policies would serve to support balanced decisions on sustainable development
  - c. ensures that terminology used in policy wording consistent with that used in corresponding legislation
  - d. applies weighting to legislation, policy and plans used to inform the development of this plan that recognises their hierarchical importance e.g. European legislation vs non-statutory plans. The latter should receive lower weighting.
- iv. the combined economic impact of a number of policies in the CSCOPE plan is one that is likely to preclude, deter or unnecessarily delay sustainable economic development. A review of policy wording with this in mind is essential and policies should be suitably worded with this in mind and ultimately a marine plan will need to be accompanied by an economic impact assessment.
- v. a review of the data used to inform the plan that is shared with the reader in such a way that it serves to attract confidence and details of how this data is going to be made available.

#### **Habitats Directive**

Treatment of the Habitats Directive in a marine plan is likely to stimulate interesting debate and is a good example of how policy can be used to enhance

- i. The main users of the MMA are laid out in the background information in Chapter Four. Felt that managers and regulator information was not necessary and would not add to the marine plan itself.
- ii. Review of sectors is set out in the Forecasting Document; however their impact is discussed as this is highly pertinent to marine planning.

iii. This review was conducted by the C-SCOPE team, and legislation gaps were identified to create new policies (e.g. HME 3). The revised marine plan has addressed issues of consistent wording and given definitions where these might differ from legislation. The hierarchy of legislation was respected in policy development, but a weighting system was not considered necessary.

iv. The Sustainability Appraisal reports that 'The Marine Plan broadly supports the economic objectives of the SA. Specifically, the Marine Plan addresses the need and demand for job opportunities and links to the necessary infrastructure to support economic development' It concludes that overall, the effects of the marine plan policies will be positive, but that 'Some of the policies seem restrictive in relation to safeguarding the environment – HME3 in particular might be too restrictive and might reign in the extent of the economic benefits. This will have a potential negative impact through the prevention of development. This is considered to be a potential minor negative effect at this stage; however it is uncertain whether this will materialize.' HME3 was discussed during the MSP T&F Group meeting in March, and the Group concluded that this was an important policy that should remain. However an additional

<p>existing legislation.</p> <p>The requirements relating to planning and development are described in Part 6 of ‘The Conservation of Habitats and Species Regulations 2010’ which relates to ‘Assessment of Plans and Projects’ and we would support a policy that reflects this legislation and would further agree that a fair conclusion to the resulting Habitats Regulations Assessment would be on of ‘no significant adverse effect’.</p> <p>Interestingly, our experience of Local Plans, seems to differ from the above and does not allow for a similar type strategically worded policy, as the suggestion is that unless development is precluded completely through policy then the conclusion of the Habitats Regulation Assessment should be on of ‘significant effect’. The subsequent requirements are the need for the planning authority to undertake a ‘no alternative solutions’ assessment and ‘overriding public interest’ assessment and the reality is that these are very difficult to do unless you have a specific project in mind. We do agree that the latter approach however is a reality in current planning policy and perhaps something that should be subject to national review.</p> <p>This conflict in opinion and emerging policies indicates that there is still much debate to be had on a policy of this kind and now doubt it will be the same for other emerging policies.</p> <p><b>In summary</b>  <b>We support</b> the aims of the Dorset Coast Forum and CSCOPE where it serves to encourage dialogue and the sharing and availability of information. <b>We do not support</b> CSCOPES aspiration for this plan to be a material consideration for local planning and regulatory authorities, or for it to be given some statutory recognition through incorporation into local plans and national marine plans. We have provided general feedback on the CSCOPE plan which we hope is helpful in informing its evolution. We have also included a brief discussion on the habitats directive and emerging policy which will no doubt attract much UK debate and we would welcome a national review noting how this is treated in certain Local Plans.</p>	<p>paragraph was added to the justification to clarify how it sits within existing legislation: ‘This policy seeks to ensure ecosystem function is considered in the context of any existing permitting processes, and the hierarchy of significance for protected sites is respected. It is therefore envisaged that there will not be an additional process burden on developers.’</p> <p><b>Habitats Directive</b>  Discussion noted. This is a challenge for ongoing marine planning and more significantly marine licensing.</p>
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**Table 12. Comments and responses on Marine Plan Figures**

Comment	Response
There are also plans [figures] which appear to be duplicated – could one be	Agreed, and we originally tried this. However, it was found to be too

included and then reference to it later (e.g. the plan of the wrecks appears twice, as do some of the biodiversity plans)	confusing and the project team decided that duplication was the simplest way of using figures. It was hoped that it would be possible to use internal links to duplicate figures, but it is not then possible to return to the original place in the document; it was felt that this would not be a good solution either.
The use of figures requires attention to reduce duplication and to ensure that adequate use is made of the information provided by each figure, for example consideration should be given to insert figures at a larger cartographic scale.	See response above. Comment on scale noted; however the final marine plan links to the Dorset Coastal Planning tool which allows the reader to interrogate data at a variety of scales.
Figure 4 shows the extent of the Local authority boundaries in the Plan area, followed by mention of the Jurassic Coast World Heritage Site (JCWHS) and Dorset AONB (DAONB). For ease of reading it may be necessary to include the boundaries of both these designated areas in this figure. It may also be advisable to include a key in figure 4, as it stands there is no mention of the plan area on this map	Figure 4 is only referenced with regard to Local Authorities, so will be retained as it stands.
Figure 8 Provides very little additional information to merit inclusion.	Noted, but will retain as it includes bathymetric data not on other figures.
Figure 16 Missing Fleet rMCZ	It is on the figure.
Figure 17 Need to add species name to legend – pretty meaningless otherwise. Why not show FOCI habitat and species records?	Species names used. Figure 17 is used to show BAP species only, as this is referenced in the text. Figure 35 includes FOCI and NIMF species.
Figure 35 Need to include species names in the legend - can clarify with "a bivalve mollusc" etc, but these are meaningless otherwise. Expand to FOCI or NIMF list	FOCI and NIMF species names used.
Figure 39 Designated Species – are these BAP species? As before include species names	Yes, and those under Bern, W&CA and Habitats Directive. Species names now included.
Figure 52 Add Worbarrow Bay - seagrass and mooring area in close proximity	Agreed and added.

**Table 13. Comments and responses on Topic Papers**

Comment	Response
The above section [in the Water Quality & Pollution Topic Paper] needs updating to reflect the new Food Hygiene Regulations which came into force on 11 January 2006, and are the result of an exercise by the European Commission to consolidate and simplify food hygiene legislation across all food sectors. See information on classification at <a href="http://www.cefas.defra.gov.uk/our-science/animal-health-and-food-safety/food-safety/classifying-shellfish-harvesting.aspx">http://www.cefas.defra.gov.uk/our-science/animal-health-and-food-safety/food-safety/classifying-shellfish-harvesting.aspx</a> .	Agreed and amended accordingly



<p>Reference p10 <a href="http://www.cscope.eu/files/results/marine-mgmt-plan/dorset/tp/TopicPaper_WaterQuality-and-Pollution.pdf">http://www.cscope.eu/files/results/marine-mgmt-plan/dorset/tp/TopicPaper_WaterQuality-and-Pollution.pdf</a> refers back to (79/923/EEC) rather than the codified Shellfish Waters Directive (2006/113/EC) acknowledged on p7.</p>	
<p>[Fisheries Topic Paper] seems to contain a link for further information on SIFCA to a job hunting site? <a href="http://www5.igrasp.com/fe/tp/capita01">http://www5.igrasp.com/fe/tp/capita01</a> I note the topic paper is dated 2010 but now Southern IFCA is up and running it has a website which would provide a useful link <a href="http://www.southern-ifca.gov.uk/">http://www.southern-ifca.gov.uk/</a>.</p>	<p>Agreed and amended accordingly</p>