

Dorset and East Devon Coast World Heritage Site Management Plan 2009-2014

Strategic Environmental Assessment
Adoption Statement, August 2009

ANNEX 1: SCHEDULE OF RESPONSES TO RECOMMENDATIONS MADE IN THE ENVIRONMENTAL REPORT



This document incorporates into a schedule the recommendations made about the draft Dorset and East Devon Coast World Heritage Site Management Plan in the Environmental Report that has arisen out of the Strategic Environmental Assessment process.

Each of the recommendations made has been considered according to the following criteria in order to ensure clarity and consistency in the process of editing of the Draft Management Plan:

A	Accepted	Formal recommendation accepted as written
P	Partially accepted	Formal recommendation partially accepted
C	Issue accepted but treated differently to suggestion	Issue addressed in Formal recommendation covered through other means
R	Rejected	Formal recommendation rejected
N	Noted	Comment noted, and not acted on because it is felt that the plan already adequately reflects the issue raised, or it would introduce too high a level of detail
T	Minor issues	Minor issues

The Environmental Report and other supporting documents are all available at www.jurassiccoast.com/plan. For any further information, please contact consult@jurassiccoast.com.

Schedule of responses to Environmental Report SEA and SA recommendations on Aims

Aim	Recommendation	Action	Notes
Aim 1	Suggest that the indicator of ' amount of coastal defence infrastructure that compromise the integrity of the SSSI / GCR that make up the WHS ' needs to be further clarified. Does 'amount' refer to length or area? Does this measure take account of changes to defence structures that could be classed in engineering terms as repair, but which could compromise the Site integrity?	A	Accept suggestion that this needs to be clarified
Aim 2	The description could be improved by referring to ' nature conservation ' rather than ' wildlife conservation ' to encompass habitats as well as species. Consideration could be given to mentioning the conservation and enhancement of 'natural beauty' as this is the statutory purpose of the AONBs which form an integral part of the setting. The description refers conservation being supported by appropriate scientific research. This could be expanded to include 'sound baseline information', as this is not necessarily the same as scientific research, and would add weight to the need to continue ongoing research and monitoring to underpin sound environmental decision making	A	Accept change
Aim 3	No recommendations		
Aim 4	Consider altering the wording to ensure that this is emphasised, for example ' benefit in ways that are...and most importantly, environmentally sustainable. '	R	Reject the suggestion as this would weaken the description; sustainability covers many aspects, not just environmental ones
Aim 5	Although not a wording change to the Aim, consideration should be given to emboldening the words ' appropriate ' and ' sustainable ', in addition to the word ' access '. This will help to give important emphasis to the overarching approach to access provision for other plan users.	A	Accept suggestion
Aim 6	Although the description refers to improving the quality and ' sustainability ' of the visitor offer, consideration should be given to reflecting this in the Aim text itself, for the avoidance of doubt and to improve its overall environmental and sustainability performance.	N	Noted, but probably unnecessary, so not included
Aim 7	No recommendations		
Aim 8	No recommendations		

Schedule of responses to Environmental Report SEA recommendations on Policies

Policy	Action	Notes
1.2	N	Noted
1.3	P	Reword to <u>'Where developments affecting the Site or setting take place, avoid and mitigate negative impacts on the natural processes....'</u> Can't use 'avoid' in a situation where there is an acceptance that some impact may take place.
1.4	A	Accept suggestion, remove the word 'structures' and change 'defence' to 'defences'
1.5	N	Noted
1.6	N	Noted
1.7	A	Accept suggestion, remove "... when defining policies"
1.8	N	Noted
1.9	C	Reject suggestion for inclusion at this point, but undertake 2 changes to the document: 1) Include a better, specific explanation of European Sites in Chapter 3, including the need to meet the Habitats Regulations 2) Under the principles in chapter 5, insert a section of text taken from the habitats regulation that relate to any development in or near the Site that is likely to affect SACs or SPAs. This is to clarify that in addition to normal planning tests they would have to meet the habitats regulations tests. Also note that N2K sites are not designated for geology or geomorphology.
1.10	N	Noted
1.11	R	It is not practical or realistic to expect a formalised binding agreement, nor would it be of benefit to raise the issue once again
1.12	N	Noted
1.13	N	Noted
1.14	A A A	Accept inclusion of "Ensure" instead of "Encourage" Accept inclusion of "Natural beauty" Accept inclusion of additional delivery action: 'MFA and MMO to ensure that EIA Screening and Scoping Opinions given by them adequately reflect the international importance of the Site for geodiversity and biodiversity.'
1.15	R R	Reject suggestion as unnecessary Reject inclusion of 'great weight' as unnecessary
1.16	P	Partially accept suggestion, change to "...avoid and minimise adverse..."
1.17	R	Reject suggestion as it would weaken the policy as it stands
1.18	C	See 1.9 above for how this will suggestion will be addressed. Also, note that N2K are not designated for their geology or geomorphology
1.19	N	Noted
1.20	A	Accept change to "Ensure that military activity <u>avoids, and mitigates adverse</u> impacts on the OUV of the Site, or the natural beauty of the setting."
1.21	R	Reject suggestion as it would weaken the policy as it stands
1.23	N	Noted
1.24	N	Noted
1.25	R A	Reject suggestion with regards buffer zones as superfluous Accept deletion of "local"
2.3	A P A	Accept suggested change to "Encourage <u>positive and</u> appropriate redevelopment..." Accept additional suggestion by adding "... where this can be achieved without significant effects on sites designated for their nature conservation value." To delivery actions Accept inclusion of "enhance" before "natural beauty"

2.4	R A	Reject suggestion as unnecessary Accept addition of " <u>where this would not damage European sites or historic environment features</u> " to policy
2.5	N	Noted
2.6	N	Noted
2.7	N	Noted
2.8	R A	Reject suggestion as unnecessary This suggestion would be covered by the actions suggested in response to 1.9
2.10	N	Noted
2.11	P	Reword the delivery actions to reflect this comment
2.12	A	Accept the inclusion of "... particularly its European interests.. " into policy.
2.13	A	Accept the suggested wording change to the policy: " <u>Promote and encourage catchment sensitive farming and environmentally sustainable land management practice adjacent to the Site, particularly to conserve and enhance its natural beauty</u> "
2.14	N	Noted
3.2	T	
3.4	N	Noted
3.6	T	
3.7	N	Noted
3.8	R	Reject suggestion as this would have to do be done anyway, so inclusion is unnecessary
3.10	P	Partially accept suggestion by adding the word "appropriate" instead of "sensitive"
3.12	A	Accept inclusion of the word "natural" in front of "beauty"
3.13	A	Accept inclusion of the word "sustainable" in front of "management"
3.14	N	Noted
4.2	A	Accept inclusion of the wording "sustainable economic prosperity" instead of "economic development"
4.3	P R	Accept inclusion of word "sustainable" in front of products Reject additional suggestions as it would cause the policy to lose coherence.
4.4	A	Accept inclusion of the word "appropriate" in front of "aspirations"
4.8	A	Accept inclusion of the word "appropriate" in front of "cultural"
4.9	N	Noted
4.10	A	Accept inclusion of the word "appropriate" in front of "healthy"
5.1	C	This suggestion would be covered by the actions suggested in response to 1.9
5.3	A	Accept inclusion of the words "and coordinate" in front of "visitor management"
5.4	A	Accept inclusion of additional wording, "...and it remains appropriate and sustainable.'
5.5	P	Accept inclusion of the word sensitively, but at the start.. of the policy
5.6	C	This suggestion would be covered by the actions suggested in response to 1.9
5.7	P	Accept and change suggestion, including the sentence "... where compatible with <u>statutory</u> conservation objectives"
5.8	N	Noted
5.9	N	Noted
5.10	C	This suggestion would be covered by the actions suggested in response to 1.9

5.11	T	
5.12	N	Noted
5.13	N	Noted
5.15	A	Accept inclusion of the phrase “appropriate and sensitively located”
5.18	N	Noted
5.19	R	Reject suggestion, but ensure that it use of local materials is recognised in the code of practice for the Arts programme, and that local artists are encouraged to get involved; the use of local artists can never be enforced, nor should it be.
6.1	N	Noted
6.2	R	Reject inclusion as the next policy covers this point, but include a mention of links to public transport in the delivery for Policy 6.3
6.3	N	Noted
6.5	T	Include MMO
6.9	N	Noted
6.10	N	Noted
6.11	N	Noted
7.5	N	Noted
7.6	N	Noted
7.8	N	Noted
7.9	N	Noted
7.10	N	Noted
7.11	N	Noted
7.12	N	Noted
8.2	A	Accept inclusion of additional wording, “... affecting the site”.
8.12	N	Noted, and this Policy will be changed to reflect the wider sustainability objectives of the work programme

Schedule of responses to Environmental Report SA recommendations on Policies

Policy and recommendation	Action	Notes
<p>Policy 1.6 'Ensure that the South Devon and Dorset, and Poole and Christchurch Bays Shoreline Management Plans take full account of the OUV of the Site and the specific geological and geomorphological features in the GCR sites when defining action for coastal defences'</p> <p>Although ensuring the Shoreline Management Plans take full account of the Site's OUV does not in itself conflict directly with the protection of material assets, it may lead to decisions on shoreline management which do not support the continued protection of material assets (E6). The current policy wording and approach remains acceptable in terms of this plan, as it is appropriate to inform the SMPs. It is the SMP process, which must balance the WHS interests with those of protecting material assets. And ultimately the decision on shoreline management is a political one. There are therefore no recommendations to revise the policy o address this specific issue.</p>	N	Noted
<p>Policy 1.8 'Ensure that any proposals for marine aggregate extraction do not have an adverse impact on the geomorphology of the Site'</p> <p>This policy may conflict with the achievement of protecting natural resources (E6) because it does not currently prevent, or encourage the reduction in, consumption of marine aggregates. However, marine aggregate extraction is an issue which affects the Site and the Management Plan needs to define its policy approach.</p> <p>This policy also has uncertain impacts on the protection of soil and land. Potential for increased erosion rates for example in front of soft cliffs where shingle etc acts as natural coastal defence for soft cliffs, and this is removed from the sediment system by extraction. Marine aggregates can be used in beach replenishment works, which may be in front of soft cliffs and thus reduce erosion rates therefore protecting soils and land on adjacent cliff tops. Preventing marine aggregate extraction could lead to an indirect increase in extraction from land-based sources with more direct impacts on land and soils. Whether this policy supports or conflicts with the protection of soils, depends on specific circumstances for each stretch of coast. In general it is considered that the protection of natural geomorphological processes proposed by this policy will support the protection of soils.</p>	N	Noted
<p>Policy 3.8 'Address the geographical gap in residential field studies provision, and explore the opportunity for a national centre of excellence in outdoor learning in Earth Sciences'.</p> <p>It is not currently clear from the plan, whether or not the new National Centre proposed near Lyme Regis is to be a new development or to be housed in an existing building. This should ideally be clarified within the plan, if this decision has been reached. If it were to be a new building within the setting this would add to the need for continued coastal defence near Lyme Regis. This could conflict with the achievement of adapting to climate change, as well as internally with Policy 1.4, which seeks to prevent development that creates a need for coastal defence. If the plan as a whole is seeking to prevent development that requires existing defences to be maintained, then it should not also be promoting such development itself.</p> <p>In addition, a new centre as opposed to reuse of an existing building would increase use of material resources for construction and therefore is likely to conflict with achievement of reductions in consumption of natural resources. The impacts of this policy are best addressed at the delivery level within the project development for the new centre. Consideration should be given to ensuring that any new development for the Centre has the highest design standards in terms of environmental performance and sustainability both in its construction and its operation so as to ensure the long term sustainability of the building. This is particularly important given that the current proposed location is near Lyme Regis and this has the potential to impact on the Sidmouth to West Bay SAC. In combination with Policy 6.3 'Projects should aspire to BREEAM very good or excellent standard' policy 3.8 is considered not likely to have significant impacts on the achievement of this sustainability objective.</p>	R	<p>Reject suggestion because the details of this development are not yet clear.</p> <p>Moreover, the building would have to, following planning guidance and take full account of designations</p>
<p>Policy 1.2 'Protect the OUV of the Site through prevention of developments that might impede the natural processes of erosion, or obscure the exposed geology, as set out in the GCR / SSSI Site details, now and in the future'</p> <p>In the short term (0-50 years) this policy is likely to generate conflict with achieving coastal</p>	N	Noted

<p>defence schemes to protect settlements from the risk of coastal flooding (S2). Impacts on current settlements and built assets/infrastructure are likely to increase in significance during the plan period owing to predicted increased winter storminess and sea level rise. However, the policy also aims to prevent the future need to defend by prevention of development close the coast. That said, over the long-term (50-100 years) this policy could reduce the number of assets at risk, through ensuring a lack of development in future risk areas. It is because of these positive impacts on the achievement of this Sustainability Objective over the longer-term strategic timescale that no changes to this policy are proposed for sustainability reasons.</p>		
<p>Policy 7.5 ‘Deliver a varied Jurassic Coast events programme including events that focus solely on the World Heritage Site, as well as integrating with existing events along the coast’ This policy has mixed impacts for E6 owing to actions for new events and which generate journeys. The negative impacts on the consumption of resources are not likely to be significant, and mitigation can easily be considered at the delivery level in event planning through considering how visitors will be able to get to and from the event. The co-ordination with other events already planned will help reduce the consumption of resources associated with travel.</p>	N	Noted and event planning will aim to mitigate negative impacts of the environment
<p>Policy 5.15 ‘Encourage the development of seasonal or permanent park and ride facilities’ Mixed support for natural resource use (E6) because may encourage reductions in fossil fuel use if less individual car journeys are made. On the negative side car park development will use resources because of customer expectations for hard standing and other associated facilities (shelters, toilets), temporary car parks could be a better option</p>	N	Noted, as temporary car parks are the most likely option
<p>Policy 5.19 ‘High quality, sensitive and creative design will be encouraged in improvements to the physical infrastructure’ This policy has uncertain impacts on the consumption of natural resources (E6) from the implementation. Impacts will depend on how improvements are implemented, such as whether sustainably produced/sourced materials are used. Ensuring that these improvements are 'sustainable' and source local and or recycled or materials, also giving consideration to their environmental impact post use (i.e. ensure they are recyclable) would improve performance. These implications are most appropriately addressed at the delivery level for each individual scheme or proposal.</p>	N	Noted