

From: Pavitt, Tom (MMO) [REDACTED]
Sent: 01 March 2018 15:02
To: Londonplan
Subject: Draft New London Plan

Dear Greater London Authority,

I registered a new account online with this email around 3 hours ago but have still not received my confirmed email, maybe I selected the wrong category. As I'm on annual leave tomorrow I provide **the Marine Management Organisation response to the Draft London Plan** here by email instead. Sorry for the inconvenience!

Marine Management Organisation response to the Draft London Plan.

In reviewing the text in **Policy SI14 Waterways – strategic role A**. The marine planning team raises the following points. In the UK we use the term 'marine planning' or 'marine plans' instead of 'marine spatial plans/planning' and would prefer this use. With no current South East Marine Plan we advise to refer to the Marine Policy Statement (as the current 2016 London Plan does) for guidance on any current planning activity that includes a section of tidal Thames. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist. The following alterations would make SI14 read similar to the following "To ensure coordination and alignment at the interface between terrestrial and marine planning, Development Plans and development proposals should take account of the emerging South East Marine Plan prepared by the Marine Management Organisation and the UK Marine Policy Statement."

<https://www.gov.uk/government/publications/uk-marine-policy-statement>

In reviewing **9.14.9** under Policy SI14 again similar to above we advise to add an addition to refer to the UK Marine Policy Statement.

In reviewing **Policy SI14 B and 9.14.7** under this we raise to your attention that the MMO is developing a Seascape character assessment for the South East Marine Plan area including the tidal Thames as well as a corresponding seascape policy. The MMO will hold a consultation on the Seascape assessment before the plan is adopted where the GLA will be sent a notification of this.

In reviewing **Policy SI17 Protecting London's waterways**, in particular section E, we raise your attention to the UK marine policy statement, which is the framework for taking decisions affecting the marine environment, and the following section on Air Quality (2.6.2 page 22). "2.6.2.1 Activities and developments in the marine and coastal area can have adverse effects on air quality at various stages. The construction, operation and decommissioning phases of projects can involve emissions to air which could lead to adverse impacts on human health, biodiversity, or on the wider environment. Other key sources that impact air quality include emissions from shipping, oil and gas platforms at sea, oil and gas importing facilities, vehicle emissions as a result of increased coastal activity, and dust from construction. The generation of energy from renewable sources has an overall beneficial effect on air quality, as compared with fossil fuels. 2.6.2.2 When developing Marine Plans, marine plan authorities should be satisfied that air quality impacts have been taken into account. They should also liaise with terrestrial authorities to consider how air quality may be improved, particularly within, or adjacent to, Air Quality Management Areas (AQMAs). In all cases, the marine plan authority should take account of any relevant statutory air quality limits."

As you have made comment to in the plan (SI14 A), the MMO marine planning team are currently undertaking the process of developing the South East Marine Plan. A number of issues, raised by stakeholders are of relevance to the GLA tidal Thames area and are being addressed by the MMO, where we hope for continued cooperation with the GLA as the South East Marine Plan content and draft policies develop to ensure compatibility between terrestrial and marine planning.

In terms of Marine Licensing which is also one of the MMO's functions we raise to your attention the Coastal Concordat. The Coastal Concordat provides a framework within which the separate processes for the consenting of coastal developments in England can be better coordinated. Where this refers to proposed works that contain aspects that fall both above and below mean high water springs. It offers benefits to applicants, regulators and advisors alike by reducing unnecessary regulatory duplication, providing better sign-posting, streamlining assessments and increasing transparency and consistency of advice. www.gov.uk/government/publications/a-coastal-concordat-for-england . In addition, the 25 Year Environment Plan (Department for Environmental, Food & Rural Affairs, 2018) states "All local authorities with a coastal interest will be signed up to the Coastal Concordat by 2021."

A simple guide to the marine licencing process for Local Planning Authorities (LPAs) has also been produced. The guide contains useful information that will enable LPAs to: (1) Better understand the marine licence application process; (2) Apply for marine licences more efficiently; (3) Provide information to their own applicants; and (4) Have access to useful contacts and relevant information.

www.gov.uk/government/publications/marine-licensing-an-guide-for-local-planning-authorities-lpas/marine-licensing-an-guide-for-local-planning-authorities-lpas

General Consultation response- PLEASE READ

Response to your consultation

The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.

Marine Licensing

Activities taking place below the mean high water mark may require a [marine licence](#) in accordance with the [Marine and Coastal Access Act \(MCAA\) 2009](#). Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.

Marine Planning

As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas.

The MMO is currently in the process of developing marine plans for the remaining 7 marine plan areas by 2021, including the South East Marine Plan.

Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the [Marine Policy Statement](#) for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the [Marine and Coastal Access Act](#) and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our [online guidance](#) and the [Planning Advisory Service soundness self-assessment checklist](#).

Minerals and waste plans and local aggregate assessments

If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:

- The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.
- The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.
- The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.

The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.

If you wish to contact the MMO regarding our response please email us at consultations@marinemanagement.org.uk or telephone us on 0300 123 1032.

-

Kind Regards,

Tom Pavitt | Marine Planning Officer (South East Plan) | Marine Management Organisation (MMO) HM Government

Address: MMO Area 8C, 9 Millbank, C/O DEFRA Nobel House, 17 Smith Square, London, SW1P 3JR

| [Website](#) [Blog](#) [Twitter](#) [Facebook](#) [LinkedIn](#) [YouTube](#) - [South East Marine Plan](#) - [MIS \(GIS Portal\)](#) –

To sign up to marine planning updates and our newsletter email us with **Subscribe** to planning@marinemanagement.org.uk

The Marine Management Organisation (MMO)

The information contained in this communication is intended for the named recipient(s) only. If you have received this message in error, you are hereby notified that any disclosure, copying, distribution or taking action in reliance of the content is strictly prohibited and may be unlawful.

Whilst this email and associated attachments will have been checked for known viruses whilst within MMO systems, we can accept no responsibility once it has left our systems.

Communications on the MMO's computer systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes. MG10

This message has been scanned for viruses by the Greater London Authority.

Click [here](#) to report this email as spam.