



Marine
Management
Organisation

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Our ref: ID 188

3rd March 2020

Dear Sir/Madam,

MMO Marine Planning and Marine Licensing response to The Greater Norwich Local Plan Regulation 18 Draft Consultation.

Thank you for giving us the opportunity to comment on the Greater Norwich Local Plan. The comments provided within this letter refer to the document entitled Greater Norwich Local Plan Draft Strategy – Regulation 18 Consultation.

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 the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers), 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. 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 the necessary considerations are included. In the case of the document stated above, the [East Inshore and East Offshore Marine Plans](#) are of relevance. The East Marine Plans cover the area from Flamborough Head to Felixstowe, including the tidal extent of any rivers within this area.

Although the Greater Norwich Local Plan area does not have any coastline, there are several tidal rivers and waterways. The East Inshore Marine Plan area extends up to Norwich on the River Yare, as well as to Wroxham on the River Bure, and to near Ellingham on the River Waveney. For a detailed view of the extent of the marine plans, please see [Explore Marine Plans](#), our online marine planning portal.

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 2009 and any relevant adopted Marine Plan, in this case the [East Inshore and East](#)



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[Offshore Marine Plans](#), or the [UK Marine Policy Statement](#) (MPS) unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our [online guidance](#), [Explore Marine Plans](#) and the [Planning Advisory Service soundness self-assessment checklist](#).

Marine Licensing

The Marine and Coastal Access Act 2009 states that a marine licence is required for certain activities carried out within the [UK marine area](#). The MMO is responsible for marine licensing in English waters and for Northern Ireland offshore waters.

The marine licensing team are responsible for consenting and regulating any activity that occurs “below mean high water springs” level that would require a marine licence. These activities can range from mooring private jetties to nuclear power plants and offshore windfarms.

Summary notes

Please see below suggested policies from the East Inshore and East Offshore Marine Plans that we feel are most relevant to the Greater Norwich Local Plan.

These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation and we would suggest your own interpretation of the East Marine Plans is completed:

- **EC1:** Proposals that provide economic productivity benefits which are additional to Gross Value Added currently generated by existing activities should be supported.
- **EC2:** Proposals that provide additional employment benefits should be supported, particularly where these benefits have the potential to meet employment needs in localities close to the marine plan areas.
- **EC3:** Proposals that will help the East marine plan areas to contribute to offshore wind energy generation should be supported.
- **SOC1:** Proposals that provide health and social well-being benefits including through maintaining, or enhancing, access to the coast and marine area should be supported.
- **SOC2:** Proposals that may affect heritage assets should demonstrate, in order of preference:
 - a) that they will not compromise or harm elements which contribute to the significance of the heritage asset
 - b) how, if there is compromise or harm to a heritage asset, this will be minimised
 - c) how, where compromise or harm to a heritage asset cannot be minimised it will be mitigated against or
 - d) the public benefits for proceeding with the proposal if it is not possible to minimise or mitigate compromise or harm to the heritage asset
- **SOC3:** Proposals that may affect the terrestrial and marine character of an area should demonstrate, in order of preference:

- a) that they will not adversely impact the terrestrial and marine character of an area
 - b) how, if there are adverse impacts on the terrestrial and marine character of an area, they will minimise them
 - c) how, where these adverse impacts on the terrestrial and marine character of an area cannot be minimised they will be mitigated against
 - d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts
- **ECO1:** Cumulative impacts affecting the ecosystem of the East marine plans and adjacent areas (marine, terrestrial) should be addressed in decision-making and plan implementation.
 - **BIO1:** Appropriate weight should be attached to biodiversity, reflecting the need to protect biodiversity as a whole, taking account of the best available evidence including on habitats and species that are protected or of conservation concern in the East marine plans and adjacent areas (marine, terrestrial).
 - **BIO2:** Where appropriate, proposals for development should incorporate features that enhance biodiversity and geological interests.
 - **MPA1:** Any impacts on the overall Marine Protected Area network must be taken account of in strategic level measures and assessments, with due regard given to any current agreed advice on an ecologically coherent network.
 - **CC1:** Proposals should take account of:
 - how they may be impacted upon by, and respond to, climate change over their lifetime and
 - how they may impact upon any climate change adaptation measures elsewhere during their lifetime Where detrimental impacts on climate change adaptation measures are identified, evidence should be provided as to how the proposal will reduce such impacts.
 - **CC2:** Proposals for development should minimise emissions of greenhouse gases as far as is appropriate. Mitigation measures will also be encouraged where emissions remain following minimising steps. Consideration should also be given to emissions from other activities or users affected by the proposal.
 - **GOV1:** Appropriate provision should be made for infrastructure on land which supports activities in the marine area and vice versa.
 - **TR1:** Proposals for development should demonstrate that during construction and operation, in order of preference:
 - a) they will not adversely impact tourism and recreation activities
 - b) how, if there are adverse impacts on tourism and recreation activities, they will minimise them
 - c) how, if the adverse impacts cannot be minimised, they will be mitigated
 - d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts
 - **TR2:** Proposals that require static objects in the East marine plan areas, should demonstrate, in order of preference:

- a) that they will not adversely impact on recreational boating routes
 - b) how, if there are adverse impacts on recreational boating routes, they will minimise them
 - c) how, if the adverse impacts cannot be minimised, they will be mitigated
 - d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts
- **TR3:** Proposals that deliver tourism and/or recreation related benefits in communities adjacent to the East marine plan areas should be supported.

Further points to note

Page 8: You refer to the Norfolk Strategic Planning Framework (NSPF), which we were consulted on last year. Although we did are not an additional signatory to the Statement of Common Ground, the document does make appropriate reference to the East Marine Plans. We would also recommend you mention the [East Inshore and East Offshore Marine Plans](#) in this section of the Greater Norwich Local Plan.

As previously stated, these are recommendations and we suggest that your own interpretation of the East Marine Plans is completed. We would also recommend you consult the following references for further information:

[East Inshore and East Offshore Marine Plans](#) and [Explore Marine Plans](#).

Yours sincerely,

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