

## **Annex H10 Approach for assessing impacts on national defence**

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H10.1 This annex outlines the method taken to assess the impacts of recommended Marine Conservation Zones (rMCZs) on national defence. The method is presented under the following sections: (1) baseline description; (2) management scenario; (3) assessment of impacts; and (4) limitations. One management scenario has been developed for national defence.

## **1 Baseline description**

H10.2 The baseline describes the type of military activity taking place in each rMCZ, where known, using a Geographical Information System (GIS) data layers (Lee, Stelzenmüller and Rogers (2010)). It is not possible to provide a detailed description of the activity (how often, when, with what, how many, etc.) as this is not available for national security reasons. The data provided by the Ministry of Defence (MoD) on the impacts of rMCZs on its activities were supplied for the suite of sites in all four of the regional MCZ projects' final site recommendations. Therefore, it is not possible to identify the specific sites that will impact on MoD activities. As such, it is not possible to break down the impacts to national defence on a site-by-site basis.

## **2 Management scenario**

H10.3 As a public authority and operator, MoD is required under the Marine and Coastal Access Act 2009 to carry out its functions and activities in a way that will further, or least hinder, the conservation objectives of MCZs (Natural England and Joint Nature Conservation Committee (JNCC), 2011a). To assist in meeting its environmental obligations, MoD has developed a Maritime Environmental Sustainability Appraisal Tool (MESAT). This will include operational guidance to reduce significant impacts of military activities on MCZs (JNCC and Natural England, 2011a).

H10.4 The Secretary of State for Defence's *Safety, Health, Environmental Protection and Sustainable Development in Defence* policy statement directs MoD to introduce management arrangements which, so far as is practicable, ensure that outcomes are at least as good as those required by the European Union's Environmental Impact Assessment Directive, from which military activities are exempt (JNCC and Natural England, 2011a).

H10.5 For the purposes of the Impact Assessment (IA), it is assumed that MoD will incur additional costs in adjusting MESAT and other MoD environmental assessment tools in order to consider whether its activities will impact on the conservation objectives of MCZs (MoD, pers. comm., 2011). It will also incur additional costs in adjusting electronic charts to consider rMCZs. This applies to both MCZs that are rMCZ Reference Areas and those that are not. Further details are given below.

H10.6 For the purposes of the IA, it is assumed that MoD will mitigate the impact of military activity on MCZ features through additional planning consideration during operations and training (as provided through the revisions to MESAT) and during coastal military activities covered by Integrated Rural Management Plans (MoD, pers. comm., 2011). This applies to all rMCZs, including rMCZ Reference Areas.

H10.7 It is assumed that depositional, extractive and potentially damaging military activities will be prohibited from rMCZ Reference Areas (JNCC and Natural England, 2010).

### 3 Assessment of the impact

H10.8 The impacts of rMCZs were assessed for the suite of rMCZs in the MCZ project area as information on the impacts was supplied by MoD at this scale.

#### 3.1 Adjustment of electronic tools and charts

H10.9 It is assumed that additional costs will be incurred by MoD in revising MESAT and other assessment tools. Revision is required to provide operational guidance on how military activities could impact negatively on MCZ features and on how the impacts might be moderated. Initial revision of MESAT (and other MoD environmental tools) and additions to electronic charting by the Hydrographic Office are estimated to cost £0.025m in year 1 of the IA 20-year period of analysis, with additional annual maintenance costs of £0.005m (MoD, pers. comm., 2011). This assumes that, once MCZs are designated, they will not change in terms of their boundaries, location or management. The costs are broken down in Table 1.

**Table 1:** Additional cost assumptions to MoD for adjustments to electronic tools and charts

Description of additional cost	One-off costs (£m)	Annual costs (£m/yr)
Technical inputs by UK Hydrographic Office.	0.015 in first year	-
Staff inputs at civilian Senior Officer (level 1) to the technical changes and preparation at 5% Senior Officer (level 1) at £47,842(gross)/yr	0.002 in first year	-
Staff inputs at civilian Senior Officer (level 2) to the technical changes and preparation at 10% Senior Officer (level 2) at £38,917(gross)/yr	0.004 in first year	-
Inputs at military Senior Officer (level 2) level to the technical changes and preparation at 5% Senior Officer (level 2) at £79,706(gross)/yr	0.004 in first year	-
<b>Subtotal for one-off costs (one-off in first year)</b>	<b>0.025 in first year</b>	-
Technical inputs by UK Hydrographic Office	-	0.005
<b>Subtotal for annual costs</b>	-	<b>0.005</b>

Source: MOD, pers. comm., 21 October, 2011.

#### 3.2 Costs of mitigation

H10.10 MOD (pers. comm., 2011) is of the opinion that designation of the rMCZs will have little direct impact on current MOD activity but that there is a possibility that future mitigation requirements for specific sites could have a greater impact. Due to a lack of information about where future MOD activity could take place, and about the scale and type of future activity, this possible impact is not quantified in the IA. The information that MOD has provided for the purposes of the IA is based on available information and does not pre-judge the mitigation that may be required for specific sites in the future.

H10.11 As MOD is operational throughout UK waters and as MCZs are likely to be extensive and have varied management measures, consideration of MCZs will be undertaken as part of planning for all MOD maritime activities. MOD has estimated the proportion of staff time it anticipates it will need to do this (pers. comm., 2011). This is shown in Table 2. MOD anticipates that costs will

reduce by 50% 4 years after MCZ designation as the location and understanding of MCZs will improve over time. This is assumed to take place in year 5 of the IA period of analysis and costs are assumed to be constant thereafter (MoD, pers. comm., 2011).

**Table 2:** Costs to MOD for the mitigation of impacts in the first 4 years following MCZ designation

Description of additional cost	Annual additional cost in specified years (£m/yr)
Input by a Military Senior Officer (level 2) Lieutenant (total salary cost of £79,706/yr): equivalent to 5% of the time of 1 Military Senior Officer (level 2) Lieutenant	In first 4 years of IA period only 0.004
Input by a Military Senior Officer (level 3) Lieutenant (total salary cost of £62,139/yr): equivalent to 5% of the time of 1 Military Senior Officer (level 3) Lieutenant	In first 4 years of IA period only 0.003
Input by a Military Senior Non-Commissioned Officer Chief Petty Officer (total salary cost of £53,751/yr): equivalent to 5% of the time of 1 Military Senior Non-Commissioned Officer Chief Petty Officer	In first 4 years of IA period only 0.003
<b>Total (annual cost in each of the first 4 years of the IA period only)</b>	<b>0.010</b>
<b>Total (annual cost in each of years 5 to 20 of the IA period only, is assumed to be 50% of cost in year 1)</b>	<b>0.005</b>

Source: MOD, pers. comm., 21 October, 2011

#### 4 Limitations

H10.12 There are a number of limitations associated with the approach adopted in the IA that derive from the assumptions made for the purposes of the IA. These include the following:

- In the absence of detailed information about existing and future military activities, the IA assumptions may wrongly represent the actual level and type of military activity in the baseline for the rMCZs.
- In the absence of information about what operational decisions will be made over the next 20 years, the IA assumptions may wrongly represent the mitigation that will be required to protect MCZ features.
- The estimated additional costs anticipated over the next 20 years are generic and may differ depending on the scale and nature of the military activities in each rMCZ.
- As rMCZ-specific information could not be obtained, the costs cannot be broken down by individual rMCZ.
- Because the necessary information is not available, the IA does not estimate the cumulative costs to MOD of impacts on activities occurring in more than one MCZ, or activities being impacted on by more than one MCZ.

## References

JNCC and Natural England. 2011a. *General Advice on Assessing Potential Impacts of and Mitigation for Human Activities on MCZ Features, Using Existing Regulation and Legislation.* Peterborough: Natural England.

JNCC and Natural England. 2011b. *Draft: Increases in costs for assessing environmental impacts of future plans and projects arising as a result of Marine Conservation Zones (MCZs).* 28.11.11. Peterborough: Natural England.

JNCC and Natural England. 2010. *Marine Conservation Zone Reference Areas: Guidance document for regional MCZ projects. Version 1.1.* Peterborough: Natural England.

Lee J, Stelzenmüller V and Rogers S. (2010). *Provision of geo-data on inshore fishing activity, renewable energy resources, mariculture, anthropological and archaeological sites to support the selection of MCZ sites.* DEFRA contract MB106: Milestone 3.

Natural England and JNCC. 2011a. *Advice on the Impacts of MCZs on Information Provision and Decisions in Relation to Marine Licensing Proposals.* Version 5.0. Peterborough: Natural England.