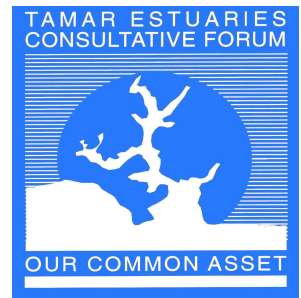


Tamar Estuaries Consultative Forum

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MCZ Team,
c/o Post Room
Nobel House
17 Smith Square
London
SW1P 3JR

26 March 2013

Our Ref: KC/26-03-13

This matter is being dealt with by:
Kaja Curry, tel 01752 304339

Email: Kaja.curry@plymouth.gov.uk

Email: MCZ@defra.gsi.gov.uk

Dear Sir / Madam

TECF RESPONSE TO DEFRA CONSULTATION ON MARINE CONSERVATION ZONES

Thank-you for the opportunity to respond to this important consultation. The Tamar Estuaries Consultative Forum (TECF) has already been fully engaged with the MCZ process. Consequently, we have successfully negotiated the redrawing of the recommended Tamar Estuaries site with Finding Sanctuary during the previous stage of discussions in order to ensure effective management of the site.

The Forum oversees the development, delivery and monitoring of the Tamar Estuaries Management Plan and provides the mechanism for ensuring that all the competent authorities comply with the Habitat Regulations.

Tamar Estuaries Consultative Forum consists of representatives from the five local authorities of Cornwall Council, Devon County Council, Plymouth City Council, West Devon Borough Council and South Hams District Council. It also includes the four port authorities of the Dockyard Port of Plymouth which comes under the Queen's Harbour Master, Cattewater Harbour Commissioners, Associated British Ports and Sutton Harbour. The relevant statutory agencies are also members and consist of Natural England, Environment Agency, Cornwall and Devon & Severn IFCAs, Marine Management Organisation and English Heritage.

Please find attached the single response from TECF for the two proposed Marine Conservation Zones which are directly relevant to the workings of the Forum as a collaborative partnership; namely Tamar Estuaries and Whitsand and Looe Bays.

Yours sincerely

Carl Necker

pp Commander Royal Navy
QHM Plymouth and Chair of Tamar Estuaries Consultative Forum



Marine Conservation Zones: Consultation on proposals for designation in 2013 Response from Tamar Estuaries Consultative Forum

1. Introduction

- 1.1. The Tamar Estuaries Consultative Forum (TECF) is a partnership consisting of the competent authorities who collectively manage the Plymouth Sound and Estuaries European Marine Site (EMS).
- 1.2. TECF has been in existence since 1994, and is the body which oversees the production and implementation of the single management scheme for the management of the EMS as set out in Regulation 36 of the Conservation of Habitats and Species Regulations, 2010.
- 1.3. It consists of five local authorities (Plymouth City Council, Cornwall Council, Devon County Council, South Hams District Council & West Devon Borough Council); four harbour authorities (Queens Harbour Master, Cattewater Harbour Commissioners, Associated British Ports and Sutton Harbour), Natural England, Environment Agency, MMO, Devon and Severn IFCA and Cornwall IFCA and English Heritage.
- 1.4. Through TECF, the partners collectively manage the complex tidal waters of the Tamar, Tavy, Lynher, Plym and Yealm estuaries and Plymouth Sound. These waters are heavily designated with a multitude of designations which include Special area of Conservation, Special Protection Area and Sites of Special Scientific Interest.
- 1.5. The waters are also one of the most intensively used stretches of water: they host Europe's largest naval port, has a nuclear installation in the form of the refitting facility for Britain's nuclear submarines, they provide the waters for the commercial port which bring in most of the fuel for use in Cornwall and Devon and they also provide the recreational sailing waters for residents and locals alike.
- 1.6. As part of this consultation, new evidence is being submitted and as such data submission forms are also attached [these are to follow in the actual consultation]. These relate to the Port of Plymouth Evidence Base 2010 and the Baseline Document for Maintenance Dredging in Plymouth Sound and Estuaries European Marine Site, 2010.
- 1.7. The content of this response relates to two proposed Marine Conservation Zones: namely Tamar Estuaries and Whitsand & Looe Bays.

1. Do you agree that this site and specified features should be designated in the first tranche? Please explain and provide evidence to support your views as necessary.

1.1. Site Name: Tamar Estuaries

- 1.1.1. TECF members would like to see the site designated for all the habitats and species which were originally put forward and would urge that the evidence is assessed again for those which DEFRA say have insufficient data certainty. In particular data regarding Smelt is held by the Environment Agency. Data regarding

the other 3, namely blue mussel beds, intertidal coarse sediment and intertidal biogenic reef was identified in the survey of the relevant SSSIs carried out in 2010 by Ecospan. Indeed there is considerable overlap between the area proposed for designation as the Tamar Estuaries MCZ and the existing Tamar-Tavy Estuary SSSI and the Lynher Estuary SSSI. [Datasheet is appended].

1.1.2. Members of TECF are unhappy that this consultation is asking them to provide views on designation when they are unclear of the implications. In the previous Finding Sanctuary consultation, indicative restrictions on activities were included and this was extremely helpful in understanding the subsequent impacts. TECF members are disappointed that DEFRA are not able to include this useful information as part of this consultation.

1.1.3. TECF supports the principle of Tamar Estuaries being part of the first tranche of designated sites but does so on the assumption that there will not be a significant economic or social impact to the way in which they carry out their functions.

1.2. Site Name: Whitsand and Looe Bays

1.2.1. The members of TECF have expressed concern that designation of Whitsand and Looe Bays may impact on the ability to function as there may be subsequent restrictions on their ability to use the neighbouring Rame Head Disposal Site. However, provided that designation does not impact on their ability to use this disposal site, then they would not have any objections to its designation.

2. Are there any additional features (not recommended by the Regional MCZ Projects) located within this site that should be protected? Please explain and provide evidence to support your views.

2.1. Site Name: Tamar Estuaries

2.1.1. There is evidence that the Tamar Estuaries is also of importance for Sea Lamprey and TECF members would urge DEFRA to examine the data to ensure that this species is also afforded the protection it requires. Environment Agency currently hold the data on this species and this should be examined as a matter of urgency. From a management perspective, it seems sensible to cluster similar species into the same site wherever possible as it results in more effective management whereby the same protective measures provide protection to more than one species.

2.2. Site Name: Whitsand and Looe Bays

2.2.1. No comment

3. Do you have any comments on the proposed conservation objectives? Please provide evidence to support your comments as necessary.

3.1. Site Name: Tamar Estuaries

3.1.1. The proposed conservation objectives for the 2 features put forward for immediate designation as well as the 4 put forward for designation subject to improved data certainty, is 'recover'. Whilst TECF recognises that this will bring it inline with the requirements of the Water Framework Directive for the same stretch of water, TECF does seek clarity on what the baseline for the 'Recovery' will be. Without this

information it is not possible for TECF members to have any meaningful input into this question.

- 3.1.2. TECF members are concerned that a 'recover' conservation objective might result in a management measures having to be put in place that will have a significant economic or social impact on the area. For example, if moorings were to be removed as a result of the conservation objective being set to 'recover' then this would be unacceptable from the TECF members perspective and TECF would therefore not be able to support this conservation objective and would instead suggest that a 'maintain' objective would be more acceptable.

3.2. Site Name: Whitsand and Looe Bays

- 3.2.1. Three features are currently designated for immediate designation: Pink sea fan, Sea fan anemone and high energy intertidal rock. Of these, the Sea fan and the anemone have an objective to 'Recover' whilst the intertidal rock has an objective to 'Maintain'.
- 3.2.2. So again, TECF would wish to understand what the baseline is to which the objective is to 'recover' and also what the management constraints will be in order to achieve this. The members of TECF would find it difficult to support this as an objective if it resulted in any changes to the use of the nearby Rame Head disposal site, as any changes would have a severe financial impact on the port authorities and operators in making disposal of dredged material more expensive. This is covered in more detail in Question 6. For these, a conservation objective of 'Maintain' would enable dredging activity to continue.
- 3.2.3. The other features which are proposed subject to sufficient data all have conservation features of 'Maintain' and TECF members would support this provided such a conservation objective enables the port to continue to use the Rame Head disposal site.

4. Are there any significant reasons for alteration of this site's boundary? Please explain and provide evidence to support your views as necessary.

4.1. Site Name: Tamar Estuaries

- 4.1.1. TECF has previously provided input to the MCZ consultation and through this successfully argued for the alignment of the MCZ boundaries with other nature conservation designations in order to aid effective management. TECF would therefore not wish to see them changed.
- 4.1.2. TECF would find it difficult to support any initiatives to extend the designation to the full limit to the South due to the intensive use of the waters.

4.2. Site Name: Whitsand and Looe Bays

- 4.2.1. Should it be decided that use of the Rame Head disposal site would impact on the Eastern edge of the Whitsand and Looe Bays proposed MCZ, then the boundary should be moved to the West for the reasons already identified.

5. Is there any additional evidence to improve data certainty for features within this site? If yes please provide evidence.

5.1. Site Name: Tamar Estuaries

5.1.1. See comments made in response to question 1 above.

5.2. Site Name: Whitsand and Looe Bays

5.2.1. No comment.

6. Are there any additional activities (that may impact the recommended features) occurring within this site that have not been captured within the Impact Assessment? Please provide evidence to support your views.

6.1. General observation (applies to both Tamar Estuaries and Whitsand and Looe Bays).

6.1.1. TECF members are concerned that the data informing the Impact Assessment as provided in this consultation is not based on any quantifiable local data and is therefore insufficient to provide any certainty. DEFRA state that the figures are purely indicative and TECF therefore questions the value of putting them in at all given that they do not reflect the actual likely impact.

6.2. Site Name: Tamar Estuaries

6.2.1. No additional activities have been identified.

6.3. Site Name: Whitsand and Looe Bays

6.3.1. Just to the South-east of the proposed Whitsand and Looe Bays MCZ site lies the Rame Head Dispersal Site. This is the designated active disposal site for dredged material from Plymouth Sound and the Tamar Estuaries.

6.3.2. There is concern amongst the members of TECF that designation of this MCZ may result in the license being withdrawn from the disposal site. This will have serious economic consequences for the ports harbour authorities and in particular the Ministry of Defence and Cattewater who require adequate water depths for the channels to ensure safe navigation. With no alternative disposal site available, any restrictions on disposal will not be supported unless an alternative with no additional environmental, economic or social impacts is identified.

6.3.3. In June 2010 Richard Benyon, the Minister for the Natural Environment and Fisheries, asked the Marine Management Organisation to determine whether the conditions under which licenses had been granted remained valid, and that any environmental effects remained tolerable. The resultant independent review of the evidence carried out by Prof M Elliott (Elliott, 2011. *Rame Head Environmental Impact Study: Review of Evidence: report to Marine Management Organisation*. IECS, University of Hull.) concluded that “the impacts of dredge disposal are evident at the Rame Head site but are low level and now widespread” and he went on to say that they are acceptable.

6.3.4. The report also found that “it is considered more environmentally sustainable to keep licensing the existing site than choose another site” and went on to state “Despite perception of environmental problems, moving the site further offshore would have adverse environmental and economic repercussions and there are not beneficial onshore uses of the dredged material” (Elliott 2011, pp 5).

6.3.5. Given these conclusions, TECF members feel that it is reasonable to assume that disposal at the licensed site will continue.

6.3.6. Additional data regarding dredging is provided in Black and Veatch 2010. *Baseline Document for Maintenance Dredging in Plymouth Sound and Estuaries*

European Marine Site.

<http://www.qhm.mod.uk/plymouth/sms?cmsaction=download&page=1712&id=1896>
Debut Services (South West) Ltd and Defence Estates.

6.3.7. Pg 8 of this document identifies that between 1985 and 2009, an annual average of 125,000 tonnes pa of maintenance dredged material was disposed of at Rame Head Dispersal Site of which 95% was related to the Naval Base activities. Of the remainder, 4% related to Cattewater and the remainder to Sutton Harbour and Millbay.

6.3.8. The document also identifies that between 1985-2009, capital dredging resulted in a total of 2,376,000 tonnes material being disposed of at the Rame Head Dispersal Site, of which 82% related to Naval Base activities.

6.3.9. QHM estimates that it costs £10 / tonne to dredge and dispose of material at sea as opposed to £100 / tonne to dredge and dispose on land. Therefore any changes which restricted disposal at sea would have a significant economic impact on the harbour authorities, be they civilian or Ministry of Defence.

ECONOMIC VALUE OF THE PORT

6.3.10. The Port of Plymouth is critical to the economics of Plymouth and the surrounding travel to work areas. Atkins 2010. Port of Plymouth Evidence Base Study. Plymouth City Council.

http://www.plymouth.gov.uk/port_of_plymouth_final_report_volume1.pdf identified that in 2009, nearly 60,000 vessel movements were recorded within the port limits of which 75% were naval related. Devonport is the largest Naval Base in Western Europe covering over 650 acres with 15 dry docks, 4 miles of waterfront, 25 tidal berths and 5 basins and in 2009, it accommodates approximately 5,000 naval vessel movements per year.

6.3.11. For 2012 the vessel movement figures for the Port of Plymouth from the Queens Harbour Master are as follows:

Table 1: Total vessel movements for Port of Plymouth 2012 (Queens Harbour Master)

Type	No. Vessel Movements
Commercial movements	1,536
Ferries	763
Other reportable movements	20,385
Serco movements (tugs & MoD support movements)	35,529
Submarines	124
Royal Fleet Auxillary	273
Military Warships	3,285
Total	61,895

6.3.12. As one of only 2 naval dockyards in England, the port supports the activities:

Naval Port Activities

6.3.13. Base port to many naval vessels including the largest, HMS Ocean at 21,000 tonnes, also seven frigates, five Trafalgar class submarines, four of the five hydrographic survey ships and two amphibious assault ships.

- 6.3.14. Only site in UK equipped to conduct nuclear submarine refits, including those of the Vanguard class.
- 6.3.15. Surface ship refitting facilities.
- 6.3.16. Home to Flag Officer Sea Training (FOST) which trains officers of all surface ships, submarines and Royal Fleet Auxiliaries as well as offering training packages to other NATO countries.
- 6.3.17. Home to Royal Navy Clearance Diving team from the Southern Diving Group covering Swanage round to Birkenhead.
- 6.3.18. From April 2013, Royal Marines Tamar will become home to 1 Assault Group Royal Marines and 10 Training Squadron and will be Britain's sole training and operational base for all Royal Marine landing craft and associated small boats.

Commercial Port Activities

- 6.3.19. Government Port freight statistics figures show that in 2011, over 2.14 million tonnes of commercial cargo went through the Port of Plymouth. (Ref: <https://www.gov.uk/government/publications/port-freight-statistics-2011-final-figures>) Plymouth is a regionally important port, handling oil products for Cornwall and Devon, dry bulk goods, fish and the European ferries serving France and Spain.
- 6.3.20. Figures from Associated British Ports show that for 2012, Millbay saw the following movements:

Type	No. Vessel Movements
Cruise liners	14
Ferries	792
Misc Ships	30
Tankers	24
Total	860

- 6.3.21. The Port Evidence Base report goes onto estimate that the marine and maritime sector in Plymouth accounts for approximately 13,500 direct jobs of which at least 8,500 are provided at Devonport which is the equivalent of 12% of total employment in Plymouth and 10% in the Plymouth Travel to Work Area.
- 6.3.22. The Evidence Base report goes onto state that the marine sector supports a further 3,400 – 6,800 jobs in Plymouth's sub-region, thereby raising the sectors overall contribution to around 19% of Plymouth's employment and 14% of the Plymouth TTWA and that at least 50% of marine related employment is accounted for by Devonport.
- 6.3.23. Atkins goes onto estimate that the marine and related sector contributes upto £1.7 billion in terms of GDP and nearly £1 billion in terms of GVA representing around 25% of the city's total GVA.
- 6.3.24. At the heart of this major cluster of marine businesses consisting of naval activity, boat building, research and development, fishing and marine services, is the relatively deep water and natural harbour of Plymouth Sound and the Tamar Estuaries. Clearly maintaining navigable channels is critical to the successful

operation of the harbour, and as such, effective maintenance dredging campaigns are crucial to the functioning of the port.

Recreational Boating

6.3.25. Plymouth Sound and the Tamar Estuaries, with its sheltered waters and proximity to large centres of population, is a centre for recreational boating, and has over 2,916 boats on the water with a further 796 stored on land within the waters (Tamar Estuaries Consultative Forum 2009 .”Managing the Environmental Impacts of Recreational Boat Storage in Plymouth’s European Marine Site”. TECF). As such recreational boating is extremely important, providing a valuable social and economic activity for the people of the area, and for the wider SW region. TECF members would therefore find it difficult to support any MCZ proposals that would reduce the level of recreational boating that takes place within the estuary.

7. Do you have any information on costs to industry not covered in the Impact Assessment, that would be directly attributable to MCZs as opposed to costs stemming from existing regulatory requirements, or evidence that suggest the need for changes to the methodologies or assumptions used in estimating costs (including in relation to fishing displacement)? If yes please provide evidence.

7.1. Site Name: Tamar Estuaries

7.1.1. No data identified

7.2. Site Name: Whitsand and Looe Bays

7.2.1. No data identified

8. Do you have any new information that was not available or used in the Impact Assessment to inform or quantify the value (of) the benefits of MCZs?

8.1. Site Name: Tamar Estuaries

8.1.1. None identified

8.2. Site Name: Whitsand and Looe Bays

8.2.1. None identified

9. Do you wish to provide comments on other aspects of this consultation as evidence requirements, identification and treatment of high risk sites. Where you disagree with the approach taken please provide evidence to support your views.

9.1. Site Name: Tamar Estuaries

9.1.1. Plymouth Sound and Tamar Estuaries is already designated a European Marine Site and as such it has a single management scheme which is produced and managed through Tamar Estuaries Consultative Forum (TECF). Since its formation in 1994, TECF has proven itself to be a flexible and adaptive management vehicle which has achieved the effective management of the European Marine Site through a collaborative approach.

9.1.2. Should Tamar Estuaries be designated as a MCZ, then rather than invent a new management structure, the Relevant Authorities feel that it would be far more effective for TECF to deliver the integrated management framework which would enable the conservation objectives to be met whilst supporting the Relevant Authorities in discharging their legal obligations.

9.2. Site Name: Whitsand and Looe Bays

9.2.1. No comment.

End.

Tamar Estuaries Consultative Forum

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Data Submission Form

Littoral Biotope Survey for Lynher Estuary & Tamar – Tavy SSSI

Contact Name: Kaja Curry, Coordinator, Tamar Estuaries Consultative Forum.
Email: kaja.curry@plymouth.gov.uk
Telephone: 01752 304339

MCZ feature, site or regional area data relates to:
Tamar Estuaries

Has this information been previously submitted as part of the MCZ process? If so, please give details including dates of when the data was submitted and who to.

Yes, this information was submitted by Natural England to DEFRA as part of the MCZ process, however it does not seem to have been taken into account.

Please clarify any copyright restrictions or restrictions on use of data provided.

No issues: the data was commissioned by Natural England so other than the usual copyright issues regarding use of OS data included in the report, none.

Section 1 Environmental data/evidence

Data Owner:
Natural England

Type of Survey (eg Geophysical/ Bathymetric/Geotechnical/ Environmental/ SocioEconomic/Cost Information)

Littoral Biotope Survey for Lynher Estuary, Tamar-Tavy SSSI (& St John's SSSI) – which is also part of the proposed Tamar Estuaries MCZ

Date of Survey:

Lynher Estuary : 2010
Tamar- Tavy Littoral Biotope Survey - 2011

Survey co-ordinates or for full coverage maps, perimeter coordinates or GIS of area:

It covers the same area as the proposed Tamar Estuaries MCZ.

Survey contractor:
Ecospan Environmental

Purpose of survey:

Littoral biotope survey for SSSIs – to assist with the condition monitoring of the SSSI.

Type(s) of data obtained (Geophysical/ Bathymetric/Geotechnical/ Environmental/ aspects of SocioEconomic)

Biotope survey data

Methods of acquisition (eg 0.1m² Hamon Grab samples, / Survey format):

Standard methodology adopted by NE for biotope surveying.

Processing methods(s)

Data provided on GIS tables.

Quality assurance / control Methods, include reference to standards where possible and /or detail of peer review where relevant.

Follows standard NE quality assurance.

Section 2: Socio-economic data

Data owner:

Type of Survey (eg socioeconomic / cost information);

Date of survey

Type(s)of data obtained (eg aspects of Socio economic data):

Method(s) of acquisition (Survey format):

Quality assurance / control methods, include reference to standards where possible and/or detail of peer review where relevant:

Non-survey Socio – Economic Data (please use this space for description of data, how data was derived, any quality assurance process)

Data Submission Form

Maintenance Dredging Baseline Document for Tamar Estuaries and Whitsand & Looe Bays MCZ

Contact Name: Kaja Curry, Coordinator, Tamar Estuaries Consultative Forum.
Email: kaja.curry@plymouth.gov.uk
Telephone: 01752 304339

MCZ feature, site or regional area data relates to:
Tamar Estuaries & Whitsand & Looe Bays

Name of Data:

Black and Veatch 2010. Baseline Document for Maintenance Dredging in Plymouth Sound and Estuaries European Marine Site.

<http://www.qhm.mod.uk/plymouth/sms?cmsaction=download&page=1712&id=1896> Debut Services (South West) Ltd and Defence Estates.

The document is available to download from the address shown above.

Has this information been previously submitted as part of the MCZ process? If so, please give details including dates of when the data was submitted and who to.

No.

Please clarify any copyright restrictions or restrictions on use of data provided.

The report was prepared by Black & Veatch Limited (BVL) solely for use by Debut Services (South West) Ltd and Defence Estates. This report is not addressed to and may not be relied upon by any person or entity other than Debut Services and Defence Estates for any purpose without the prior written permission of BVL. BVL, its directors, employees and affiliated companies accept no responsibility or liability for reliance upon or use of this report (whether or not permitted) other than by Debut Services and Defence Estates for the purposes for which it was originally commissioned and prepared. In producing this report, BVL has relied upon information provided by others. The completeness or accuracy of this information is not guaranteed by BVL.

The report was used in order for the MoD to secure a maintenance dredging license from the MMO and was signed off by Natural England.

Section 1 Environmental data/evidence

Data Owner:

Black and Veatch Ltd, Debut Services (South West) Ltd and Defence Estates.

Type of Survey (eg Geophysical/ Bathymetric/Geotechnical/ Environmental/ SocioEconomic/Cost Information)

An analysis of dredging activity within the Plymouth Sound and the Tamar Estuaries.

Date of Survey:

Work carried out in 2010-11

Survey co-ordinates or for full coverage maps, perimeter coordinates or GIS of area:

It covers the waters of Plymouth Sound and the Tamar Estuaries.

Survey contractor:

Black & Veatch

Purpose of survey:

The report represents the 'Baseline Document' for the MoD at Devonport Naval Base, and contains information relevant to the integrity of the Plymouth Sound and Estuaries European Marine Site (EMS), comprising the Plymouth Sound and Estuaries Special Area of Conservation (SAC) and the Tamar Estuaries Complex Special Protection Area (SPA) and eight associated Sites of Special Scientific Interest (SSSIs).

Statistics from the report are quoted in the response from Tamar Estuaries Consultative Forum which includes the amount of material dredged per year from the navigational channels of the naval dockyard which may be an issue for the proposed MCZs at Tamar Estuaries and also Whitsand and Looe Bays given that it is disposed of at the nearby Rame Head Dispersal Site.

Type(s) of data obtained (Geophysical/ Bathymetric/Geotechnical/ Environmental/ aspects of SocioEconomic)

Hydromorphological and socio Economic and in particular the existing dredging regime including an overview of the activity, summary of Naval Base dredging operations, capital dredging, dredging since the SAC designation, other maintenance dredging operations and previous bathymetric surveys.

Methods of acquisition (eg 0.1m2 Hamon Grab samples, / Survey format):

Analysis of primary data held by the harbour authorities.

Processing methods(s)

Desk top analysis.

Quality assurance / control Methods, include reference to standards where possible and /or detail of peer review where relevant.

Follows standard NE quality assurance.

Section 2: Socio-economic data

Data owner: see above.

Type of Survey (eg socioeconomic / cost information);

The report represents the 'Baseline Document' for the MoD at Devonport Naval Base, and contains information relevant to the integrity of the Plymouth Sound and Estuaries European Marine Site (EMS), comprising the Plymouth Sound and Estuaries Special Area of Conservation (SAC) and the Tamar Estuaries Complex Special Protection Area (SPA) and eight associated Sites of Special Scientific Interest (SSSIs).

Statistics from the report are quoted in the response from Tamar Estuaries Consultative Forum which includes the amount of material dredged per year from the navigational channels of the naval dockyard which may be an issue for the proposed MCZs at Tamar Estuaries and also Whitsand and Looe Bays given that it is disposed of at the nearby Rame Head Dispersal Site.

Date of survey**Type(s)of data obtained (eg aspects of Socio economic data):**

Method(s) of acquisition (Survey format):

Quality assurance / control methods, include reference to standards where possible and/or detail of peer review where relevant:

Non-survey Socio – Economic Data (please use this space for description of data, how data was derived, any quality assurance process)

END.