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CL-2202 – HOLBEACH TARGET REPLACEMENT

EAST INSHORE MARINE PLAN COMPLIANCE REVIEW

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1.0 Introduction

1.1 Context

Topbond PLC has engaged Marmus Ltd to undertake a East Inshore Marine Plan Compliance Review to support the application for the installation of new marine infrastructure to act as replacement targets for the Holbeach Air Weapons Range barges currently in position. This report will accompany all consents for the target replacement project.

The existing targets at position 6N at Holbeach AWR have been in position for approximately 50 years and have reached the end of their design life and are no longer functioning fit for purpose.

The proposed development is for the positioning of two new barges within the air range at target 6N. The new targets will be formed of two barges that will be 30m in length by 6m in width and 5m in height orientated alongside the existing targets. These new barges will form a 60m long target at 5m high. The targets will be painted with a high visibility orange paint to aid the range operations. The new target barges will be constructed off-site with flooding ports which can be sealed for transport and opened once in position.

They will be towed to site at high water and positioned alongside the old targets. They will be held in position whilst the tide falls, and they ground. Once grounded the tug crews will open the flooding valves on each target barge and await the next flood tide. As the tide rises the barges will flood and remain in position. The targets will be observed for another tide period to make sure they remain in place and secure to the seabed. On the next flood tide, the tugs will demobilise and the target will be monitored for movement by the range over the next 6 months. There are limited impacting works taking place during the positioning of the new targets, and no construction work is required on site.

This report aims to address the project's compliance with the relevant policies provided within the East Inshore Marine Plan.

1.2 Location

The location for the works for the development is North of the entrance to Kings Lynn in the Wash, Grid Reference TF 47419 32202. The site is located within the Wash Inner Waterbody which is situated within the Anglian river basin.



Aerial photo of site taken from Google Maps highlighting the area for Target 6N.

1.3 Existing Targets

The image below shows the current condition of the existing targets, highlighting the need for the replacements. The structure has almost completely rotted away and is no longer providing an adequate target for training purposes.



Aerial photo of existing targets taken from drone survey 27.06.22

2.0 East Inshore Marine Plan

2.1 Introduction

This assessment of the new target barges has been prepared to adhere to the objectives of the East Inshore Marine Plan (**EIMP**). The EIMP is the framework for preparing Marine Plans and makes certain that it contributes to the achievement of sustainable development in the United Kingdom's marine area.

This EIMP has been prepared and adopted for s.51 of the Marine and Coastal Access Act 2009². The EIMP is developed in accordance with the requirements set out under the Marine and Coastal Access Act 2009 and UK Marine Policy Statement.

The Objectives of the East Inshore Marine Plan are as follows:

- 1 To Promote the sustainable development of economically productive activities, taking account of spatial requirements of other activities of importance to the East marine plan areas.**
- 2 To support activities that create employment at all skill levels, taking account of the spatial and other requirements of activities in the East marine plan areas.
- 3 To realise sustainably the potential of renewable energy, particularly offshore wind farms, which is likely to be the most significant transformational economic activity over the next 20 years in the East marine plan areas, helping to achieve the United Kingdom's energy security and carbon reduction objectives.
- 4 To reduce deprivation and support vibrant, sustainable communities through improving health and social well-being.
- 5 To conserve heritage assets, nationally protected landscapes and ensure that decisions consider the seascape of the local area.**
- 6 To have healthy, resilient and adaptable marine ecosystem in the East marine plan areas.
- 7 To protect, conserve and, where appropriate, recover biodiversity that is in or dependent upon the East marine plan areas.
- 8 To support the objectives of Marine Protected Areas (and other designated sites around the coast that overlap, or are adjacent to the East marine plan areas), individually and as part of an ecologically coherent network.
- 9 To facilitate action on climate change adaptation and mitigation in the East marine plan areas.
- 10 To ensure integration with other plans, and in the regulation and management of key activities and issues, in the East marine plans, and adjacent areas.
- 11 To continue to develop the marine evidence base to support implementation, monitoring and review of the East marine plans.

2.2 Policies

Policies contained in the East Inshore Marine Plan support delivery of the plan objectives to achieve the vision and address issues identified in the plan area. Where a plan objective cannot be achieved through existing legislation, new policies have been put in place. The resulting marine plan policies must be complied with in line with requirements under the Marine and Coastal Access Act 2009 section 58. The policies may also clarify existing requirements or make them relevant to the plan area.

Policies cover a wide range of topics, including activities and uses, economic, social and environmental considerations, and cross-cutting issues such as integration of decision making on land and at sea. While some policies apply across the whole of the East Inshore Marine Plan Area, other policies apply only to specific areas. Plan policies and relevant supporting information have been expressed spatially where possible.

Individual marine plan policies must not be read in isolation. The marine plan must be read as a whole, taking all plan policies together. It is unlikely that a particular decision will involve only one policy or all policies. Instead, several plan policies are likely to be pertinent to a decision. Decision-makers, working with proponents and others as necessary, are to determine which plan policies apply to a particular decision, and which policies can be screened out. Given the range of activities in the marine plan area, the variety of proposals, the East Inshore Marine Plan does not cross-reference to other relevant plan policies. The relevance of policies must be determined based on the individual circumstances of each proposal.

3.0 Screening

In reviewing the East Inshore Marine Plan Policies it is evident that not all policies may be relevant to the proposed works. This section of the report will assess the relevance of the policy topic and screen out those which are deemed not relevant. There are 44 topics from 33 policies covered in the East Inshore Marine Plan, the table below lists each topic and determines whether the project has the potential to impact on any topic. If it is found the project could affect any topic it will be explored in more depth with an impact assessment in the following sections.

3.1 Topic Assessment

	Topic	Assessment	Impact Assessment?
Policy EC1			
1.	Economic	The project is for replacement targets on MOD land, there is limited opportunity for economic benefits, the policy will not be assessed in the impact assessment.	No
Policy EC2			
2.	Employment	The project will not provide any addition opportunity for employment, the policy will not be assessed in the impact assessment.	No
Policy EC3			
3.	Offshore Wind	The project does not contribute to offshore wind generation, the policy will not be assessed in the impact assessment.	No
Policy SOC1			
4.	Health & Social Well-being – access	The project does not propose any changes to access to the coast & marine area, the project will not be assessed in the impact assessment.	No
Policy SOC 2			
5.	Heritage assets	The project does not involve disturbance of any heritage assets, the project will not be assessed in the impact assessment.	No
Policy SOC3			
6.	Nationally designated areas	The works are not within a Heritage coast area, an Area of Outstanding Natural Beauty or found within the Broads, this section of the policy will not be assessed in the impact assessment.	No
7.	Seascape	Two new target barges are to be installed at site and could impact the seascape of the area. This section of the policy will be assessed in the impact assessment.	Yes
Policy ECO1			
8.	Ecological & chemical water quality	The installation of the new target barges could impact ecological and chemical water quality. This section of the policy will be assessed in the impact assessment	Yes
9.	Hazardous substances	The installation of the new target barges does not include hazardous substances, this section of the policy will not be assessed in the impact assessment.	No
10.	Ship to ship transfers	The installation of the new target barges does not include ship to ship transfer of any substances, this section of the policy will not be assessed in the impact assessment.	No
11.	Air quality	The installation of the new target barges has a potential to impact air quality locally during the installation operation, this section of the policy will be assessed in the impact assessment.	Yes
12.	Invasive non indigenous species	The installation of the new target barges will have limited potential to introduce Invasive non indigenous species, this section of the policy will be assessed in the impact assessment.	Yes
13.	Noise	The installation of the new target barges has a potential to introduce noise locally during the installation operation, this section of the policy will be assessed in the impact assessment.	Yes

14.	Litter	The installation of the new target barges will not introduce litter to the marine plan area, this section of the policy will not be assessed in the impact assessment.	No
Policy BIO1 & BIO2			
15.	Biodiversity	The installation of the new target barges could impact upon the biodiversity of the marine plan area during the installation period, the policy will be assessed in the impact assessment.	Yes
Policy MPA1			
16.	Marine protected areas	The installation of the new target barges has the potential to impact marine protected areas locally for a short period during the installation of the barges. The policy will be assessed in the impact assessment.	Yes
Policy CC1			
17.	Climate change impacts	The installation of the new target barges will not contribute towards climate change impacts in the marine plan area. The policy will not be assessed in the impact assessment	No
Policy CC2			
18.	Emissions	The installation of the new target barges has a potential to introduce emissions locally during the installation, the barges themselves will not produce emissions during their life time. The policy will be assessed in the impact assessment.	Yes
Policy GOV1			
19.	Navigational safety	The installation of the new target barges could pose a risk to navigational safety, this section of the policy will be assessed in the impact assessment.	Yes
20.	Coastal change management	The works will have no impact on coastal change management in the area, the topic will not be assessed in the impact assessment.	No
Policy GOV2			
21.	Cross-border co-operation	The works will have no impact on cross-border co-operation, the topic will not be assessed in the impact assessment.	No
Policy GOV3			
22.	Integration with terrestrial planning and other plans	The works will not displace other existing or authorised activities and will support the current activity of the Holbeach AWR, the topic will not be assessed in the impact assessment	No
Policy DEF1			
23.	Defence	The works are taking place within an AWR on behalf of the Ministry of Defence, they are aware and support the works, the topic will not be assessed in the impact assessment.	No
Policy OG1			
24.	Existing oil & gas	The works are not situated within an area with existing oil and gas production, the topic will not be assessed in the impact assessment.	No
Policy OG2			
25.	New oil & gas	The works are not for new oil and gas proposals, the topic will not be assessed in the impact assessment.	No
Policy WIND1			
26.	Development within Wind farm lease land	The works are not situated within an area for wind farm leases and will not impact any such area, the topic will not be assessed in the impact assessment.	No
Policy WIND2			
27.	Offshore wind development	The works are not for Offshore Wind development, the topic will not be assessed in the impact assessment.	No
Policy TIDE1			
28.	Development within identified tidal stream resource	The works are not situated near or within any site designated for tidal stream resource, the topic will not be assessed in the impact assessment.	No

Policy CCS1			
29.	Development within potential carbon dioxide storage areas	The works are not situated near or within any site designated for carbon capture storage, the topic will not be assessed in the impact assessment.	No
Policy CCS2			
30.	Installation of Carbon Capture and Storage infrastructure	The works are not for the installation of any carbon capture storage infrastructure, the topic will not be assessed in the impact assessment.	No
Policy PS1			
31.	IMO designated routes	The works are not situated within any IMO designated route and will not impact any such route, the topic will not be assessed in the impact assessment.	No
Policy PS2			
32.	Important navigation routes	The works are not situated within any important navigation routes and will not impact any such route, the topic will not be assessed in the impact assessment.	No
Policy PS3			
33.	Ports & Harbours	The works are taking place within a Harbour administrative area, the topic will be assessed in the impact assessment.	Yes
Policy DD1			
34.	Dredging & disposal	The works are not situated within or adjacent to any licensed dredging and disposal area, the topic will not be assessed in the impact assessment.	No
Policy AGG1			
35.	Aggregates	The works are not situated within any area licensed for the extraction of aggregates, the topic will not be assessed in the impact assessment.	No
Policy AGG2			
36.	Proposed aggregate site	The works are not situated within any area subject to an Exploration and option Agreement with the Crown Estates, the topic will not be assessed in the impact assessment.	No
Policy AGG3			
37.	High potential aggregate resource areas	The works are not situated within any area defined as of high potential aggregate resource, the topic will not be assessed in the impact assessment.	No
Policy CAB1			
38.	Cable installation	The works do not involve installation of cable, the topic will not be assessed in the impact assessment.	No
Policy FISH1			
39.	Fishing Areas	The works take place in an area shown to be used for fishing activity, the topic will be assessed in the impact assessment.	Yes
Policy FISH2			
40.	Fish spawning grounds	The works take place in an area shown as herring nursery, the topic will be assessed in the impact assessment.	Yes
Policy AQ1			
41.	Sustainable aquaculture sites	The works have been shown to be situated within an area optimum for aquaculture potential, the topic will be assessed in the impact assessment.	Yes
Policy TR1			
42.	Tourism	Due to the negligible impact of the installation, there will be no impact to tourism, the addition of the new targets will in turn draw more tourism to watch the training, the topic will not be assessed in the impact assessment.	No
Policy TR2			
43.	Recreational boating	The works are for the installation of a static target adjacent to the existing static target, the topic will be addressed in the impact assessment	Yes

Policy TR3			
44.	Tourism benefits	The works have the potential to continue to drive tourism by ensuring the AWR training can continue providing tourism opportunities and viewing for the public, the topic will be addressed in the impact assessment.	Yes

4.0 Impact Assessments & Mitigations

Having completed the screening process, it has been found that an impact assessment is required with regards to 15 Topics highlighted in the policies of the East Marine Plan:

- Seascape
- Ecological & Chemical Water Quality
- Air Quality
- Invasive Non-Indigenous Species
- Noise
- Biodiversity
- Marine Protected Areas
- Emissions
- Navigational Safety
- Ports & Harbours
- Fishing Areas
- Fish Spawning Grounds
- Sustainable Aquaculture
- Recreational Boating
- Tourism Benefits

The following table will address the policies in each highlighted topic, its aims and mitigations where needed, to address the compliance of the project with the East Inshore Marine Plan. The project will follow the mitigation hierarchy detailed in the East Inshore Marine Plan which is as follows:

Mitigation hierarchy requirement	Application
Avoid	To prevent the impact by removing the source. Proposals are designed so that adverse impacts are no longer received by the receptor. Proposals must attempt to avoid before moving to minimise stage.
Minimise	To reduce severity to the smallest possible amount or degree by altering the intensity of the source. Proposals are designed so that adverse impacts received by the receptor, before mitigation is applied, are reduced to the smallest possible amount or degree. Proposals must attempt to minimise before moving to the mitigation stage.
Mitigate	To reduce how an adverse impact (after it has been minimised at source) is experienced by the receptor without altering it at the source. Proposals must mitigate before moving to the compensate stage, where applicable.
Compensate	To provide an act in return for causing adverse impacts. Proposals include measures to balance against the adverse impacts caused.

5.1 Impacts Mitigation

The works are to be carried out from the river using floating plant.

Topic	Policy Code	Policy text	Mitigation
Seascape	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 impact 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	The proposed targets are to facilitate the continued operation of the Holbeach AWR. The new target will be of similar construction and characteristic as the old existing targets. With this it is considered that the new targets are in keeping with surrounding marine character and there will be no adverse impacts and the project is in keeping with this policy of the East Inshore Marine Plan.
Ecological & Chemical Water Quality	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.	The works proposed will have no material impact on any aspect of ecological or chemical water quality. The targets are being fabricated off site and towed to a nearby port where they will then be brought to site on a high tide using local small tugs. They will be held in position using ground anchors and landed on the seabed at low tide and allowed to flood in their final position. The works are such short term and low impact that they will have no material impact to ecological or chemical water quality, and it is considered that the project is in keeping with this policy of the East Inshore Marine Plan.
Air Quality	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.	The works proposed will have no material impact on any aspect of Air quality. The targets are being fabricated off site and towed to a nearby port where they will then be brought to site on a high tide using local small tugs. They will be held in position using ground anchors and landed on the seabed at low tide and allowed to flood in their final position. The works are such short term and low impact that they will have no material impact to air quality and it is considered that the project is in keeping with this policy of the East Inshore Marine Plan.

Invasive Non-Indigenous Species	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.	The works proposed will have no material impact on invasive non-native species. The targets are being fabricated off site and towed to a nearby port where they will then be brought to site on a high tide using local small tugs. The new targets will be freshly painted hulls and not left to accumulate any fouling. The tugs doing the towage from the fabrication site to the nearby port will adhere to the latest ballast water conventions to prevent transmission of INIS. The works are such short term and low impact that they will have no material impact through the spread of INIS and it is considered that the project is in keeping with this policy of the East Inshore Marine Plan.
Noise	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.	The works proposed will have no material impact on the East Inshore Marine Plan through the introduction of noise. The targets are being fabricated off site and towed to a nearby port where they will then be brought to site on a high tide using local small tugs. They will be held in position using ground anchors and landed on the seabed at low tide and allowed to flood in their final position. The works are such short term and low impact that they will have no material impact to the Marine Plan area through the introduction of noise and it is considered that the project is in keeping with this policy of the East Inshore Marine Plan.
Biodiversity	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).	The works proposed will have no material impact on Biodiversity within the East Inshore Marine Plan area. The targets are being fabricated off site and towed to a nearby port where they will then be brought to site on a high tide using local small tugs. They will be held in position using ground anchors and landed on the seabed at low tide and allowed to flood in their final position. The ecological impact assessment prepared by ECOSA determined that there would be no impacts to any marine protected area or ecology as a result of the proposed installation. The works are such short term and low impact that they will have no material impact to the biodiversity of the Marine Plan area and it is considered that the project is in keeping with this policy of the East Inshore Marine Plan.
Marine Protected Areas	MPA1	Any impacts on the overall Marine Protected Area network must be taken account of in strategic level measures and assessment, with due regard given to any current agreed advice on an ecologically coherent network.	The works will have no material impact on any of the Marine Protected Areas in which they are situated. The site lies within The Wash SPA, Ramsar Site, NNR and SSSI and the Wash and North Norfolk Coast SAC. An Ecological Impact Assessment was prepared to assess the projects impacts on all of the above along with a Shadow Habitat Regulation Assessment. It was deemed that there would be no material impact to any Marine Protected area as a result of the replacement Target Barge project. Due to this it is considered that the project is in keeping with this policy of the East Inshore Marine Plan.

Emissions	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.	The works will have no material impact on the East Inshore Marine Plan Area through emissions of greenhouse gases. The works are due to take approximately 1 week to complete and the project lends itself to limited production of emissions. Two small local tugs will be used to position the targets in place and they will be switched off whilst they wait for the tide to recede and whilst they wait for the following tide. It is considered that the impacts the East Inshore Marine Plan area will be negligible and that the project is in keeping with this policy.
Navigational Safety	GOV1	Appropriate provisions should be made for infrastructure on land which supports activities in the main area and vice versa.	The works will not be within or encroach upon any high density navigation routes, strategically important navigation routes, or pose a risk to the viability of passenger services. The new targets will be situated adjacent to the existing in an area designated as an AWR that is not usually used for navigation. Due to this the impact to Navigational Safety as a result of the Target replacement works will be negligible and it is considered that the project is in keeping with this policy of the East Inshore Marine Plan.
Ports, Harbours & Shipping	PS3	Proposals 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 impact 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	The works are taking place within a Harbour administrative area. A works licence will be obtained from the relevant harbour authority prior to installation taking place. The works will be taking place outside of any usual navigable waters and the new targets will be placed adjacent to the existing target and painted to follow NATO requirements for targets on Air Weapon Ranges. Due to the position of the works and the way the targets will be situated there will be no material impacts to Ports, Harbours and Shipping. It is considered that the project is in keeping with this policy of the East Inshore Marine Plan.

Fishing Areas	FISH 1	Within areas of fishing activity, proposals 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 impact 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	The works are taking place within an area which has been shown to have various signs of fishing activity. The indicative maps within The East Inshore Marine Plan show the area as having a higher intensity of combined gear fishing. The works themselves have the potential to have limited impacts on fishing within a very localised area. However, this is short term and small scale in nature during the installation, lasting no more than 1 week. The situation of the new targets will have no material impact on fishing areas as the targets are simply a static object that has no operational parameters. With this in mind there will be no material impacts to fishing areas as a result of the new targets. It is considered that the project is in keeping with this policy of the East Inshore Marine Plan.
Fish Spawning Grounds	FISH2	Proposals 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 impact 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	The works are taking place within an area which has been shown to be a nursery for Herring in Figure 26 of the East Marine Plan. The works themselves have the potential to have limited impacts on fish spawning grounds in a very localised area. However, this is short term and small scale in nature during the installation, lasting no more than 1 week. The situation of the new targets will have no material impact on fishing areas as the targets are simply a static object that has no operational parameters. With this in mind there will be no material impacts to fish spawning grounds as a result of the new targets. It is considered that the project is in keeping with this policy of the East Inshore Marine Plan.
Sustainable Aquaculture	AQ1	Within sustainable aquaculture development sites (identified through research), proposals 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 impact 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	The works are taking place within an area which has been shown to be an Optimum site of aquaculture potential in Figure 27 of the East Marine Plan. The works themselves have the potential to have limited impacts on sustainable aquaculture in a very localised area. However, this is short term and small scale in nature during the installation, lasting no more than 1 week. The situation of the new targets will have no material impact on sustainable aquaculture as no sites would be set up within the MOD Danger and Exercise Area. The targets are simply a static object that has no operational parameters and therefore have limited opportunity to have any impacts themselves. With this in mind there will be no material impacts to Sustainable Aquaculture as a result of the new targets. It is considered that the project is in keeping with this policy of the East Inshore Marine Plan.

Recreational Boating	TR2	Proposals that require static objects in the East marine plan areas, should demonstrate, in order of preference: - That they will not adversely impact the terrestrial and marine character of an area - How, if there are adverse impacts on the terrestrial and marine character of an area, they will minimise them - How, where these adverse impact on the terrestrial and marine character of an area cannot be minimised they will be mitigated against - The case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts	The works site is situated within the RYA sailing area as shown in Figure 28 within the East Inshore Marine Plan. However, the site is within the MOD Danger and Exercise area which limits traffic, the barges are also situated adjacent the existing barges so no major change to the area is anticipated. The impacts to recreational boating as a result of the new targets will be negligible. It is considered that the project is in keeping with this policy of the East Inshore Marine Plan.
Tourism Benefits	TR3	Proposals that facilitate waste re-use or recycling to reduce or remove marine litter will be supported. Proposals that could potentially increase the amount of marine litter in the marine plan area must include measures to, in order of preference: - avoid - minimise - mitigate - waste entering the marine environment.	The proposed works allow for the continued operation of the AWR which bring fast jets, helicopters and personnel to train with weapons. The sea wall path along this area is a public right of way and the training brings enthusiasts to watch the activity. By ensuring the targets are operational it is considered the project is supporting tourism in the area.

6.0 Conclusion

This report has followed the plan policies available in chapter 3 of the East Marine Plan. The initial objectives and policies were screened for impacts that could be caused by the installation of the new targets at Holbeach AWR. The screening process identified 15 topics at risk which required addressing in the impact assessment.

With the Screening stage completed, the Impact Assessment for the works activity was then carried out using the policies provided in chapter 3 of the East Marine Plan. This assessed the project's impacts on the viable topics highlighted in the screening stage. The mitigation processes identified in this assessment are intended to contribute to the continued improvement of the East Inshore Plan Area.

In completing this compliance assessment, we consider that the works will not cause deterioration to any element of the East Inshore Marine Plan. Overall, the installation of the New Targets at Holbeach Air Weapons Range is considered compliant with the objectives set out in the East Inshore Marine Plan.

7.0 References

- ¹ **GOV.UK**, The East Marine Plan.
<https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/312496/east-plan.pdf>
- ² **DEFRA**, Magic Maps.
<<https://magic.defra.gov.uk/MagicMap.aspx>>
- ³ **ECOSA**, Shadow Habitat Regulations Assessment
22.0090.0002.F0, 04/08/22.
- ⁴ **ECOSA**, Ecological Impact Assessment,
22.0090.0001.F0, 04/08/22.