

The RYA welcomes the opportunity to the comment on MLA/2019/00032.

We do not object in principle to an aquaculture development within the approximate location. There remain a number of concerns that if not addressed, would leave us no option but to object.

The applicant has made numerous references to the location not coinciding with high recreational use. This is entirely inaccurate. Projecting the proposed location on the UK Coastal Atlas of Recreational Boating clearly shows that the western part of the site is in a very high use area, with the rest in a high use area. Further, the local boat clubs of Weymouth confirm that the location is within a direct cruising route to and from Weymouth.

The Weymouth and Portland National Sailing Academy (WPNSA) is a local stakeholder, hosting international sailing events, including the 2012 Olympics. The proposed site intersects one of the WPNSA racing areas. While the WPNSA claims no right to the area, the impacts on the centre should be given due consideration. By effectively removing a racing area, WPNSA would no longer be able to host its largest events. We consider that this would represent a major negative social impact, by limiting exposure to high level sporting activity. We consider that the proposal should be assessed against S-SO-1. There is likely to be an economic impact, which could easily negate the intended net employment increase of the proposal.

The applicant references stakeholder engagement. It is true that an RYA representative attended a workshop. Upon digestion of the information provided, further communications from the RYA representative recommended that the site be moved half a mile east, so as to avoid the busiest recreational boating area, and also the WPNSA racing area. The applicant's response was dismissive of the suggestion, implying the social impacts were not priorities. We were left unclear what the intention of the stakeholder workshop was, if not to give consideration to its feedback. This communication is not reflected in the project document. It is also not accurate for the applicant to claim that sailing groups have not voiced opposition.

The applicant has stated that risk will be reduced to recreational vessels passing through the site. We are not clear that the applicant is qualified to make this assessment. We consider that a navigational risk assessment should be completed prior to any approvals being granted.

We commend the applicant in making reference to the south marine plan. However, the proposal is not a barrier to access, therefore it is inaccurate to reference S-ACC-1. Instead the proposal should be assessed against S-TR-2, and S-CO-1. Impacts to recreation could be avoided by moving further offshore. If the applicant can justify that this is not feasible, we would accept that impacts might be minimised by moving the site eastward, and by conducting a navigational risk assessment and implementing its recommendations, assuming these recommendations do not themselves impact recreational boating.