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Dear Giles,

Re: The Portland Harbour Several Order 2017

On 11th May 2017, a meeting was held by the local recreational boating clubs and training centres around Portland Harbour to discuss the proposed Portland Harbour Several Order, which I attended on behalf of the Royal Yachting Association (RYA)¹. Those present included representatives from RYA affiliated organisations including Weymouth and Portland National Sailing Academy, Andrew Simpson Sailing Centre, Weymouth and Portland Cruising Association, Royal Naval Sailing Association, and Castle Cove Sailing Club. Portland Marina were also represented. Although unable to send a representative in person, input from Weymouth Sailing Club, Royal Dorset Yacht Club, OTC, and PGL was portrayed by other attendees. This letter summarises the concerns raised by these organisations and the RYA following this meeting.

Many of the concerns relate to the more intensive use of the area proposed by the applicant, compared to use under the previous Several Order, particularly as the usage of the area by the recreational boating community has dramatically increased since the previous Order was granted.

Recreational boating activity takes place throughout the area of the proposed Order. Race and training marks are laid throughout the Order area, with the exception of the Fairway Channel and the north-west corner near Ferrybridge. They are laid in all months of the year, although the requirement is minimal in December and January. Race locations vary with boat type, tides, weather conditions, Harbour Master instructions, event schedules, and to ensure separate clubs/ training centres keep course clashes to a minimum. Activity encompasses a variety of vessel types and activities, all age groups and levels of experience from complete novices, through RYA Youth and Junior Squads, to the British Sailing Team, as well as general recreational, cruising, training and racing activity. In an already busy area, concern has been raised as to the addition of potential hazards to navigation including fisheries-related vessels and divers, and oyster cages, and the conflicts over space that may arise.

a. Oyster Cages

The proposed oyster cages are of major concern. As mentioned in our previous responses, these can pose a serious hazard to navigation. The number of proposed oyster cages is not clearly noted in the current management plan². Clarification is required as to the number of cages proposed, where these

¹ The RYA is the national body for all forms of recreational and competitive boating under sail or power. It represents dinghy and yacht racing, motor and sail cruising, RIBs and sportsboats, powerboat racing, windsurfing, inland cruising and personal watercraft. The RYA also sets and maintains an international standard for recreational boat training.

² The management plan referred to throughout this letter is that dated 25 March 2017. By using the estimated tonnages (50-400 tonnes per year, with 100 tonnes estimated by year 5) laid out in the management plan, and the indication that each cage could accommodate up to 250 kg of oysters, we have come to a number of at least 400 cages by year 5, which could increase to ~1600 cages if the 400 tonne estimate is reached.

cages are to be located specifically (rather than just a depth condition as is laid out in the current management plan), and more information as to how these would be marked.

In relation to specific uses of Portland Harbour waters by the recreational boating community, concerns in relation to cages are as follows:

- Potential risks due to masts from inverted dinghies becoming entangled in said cages. Dinghy mast heights were noted to be in the range of 3 to 8 metres, while the proposed management plan for the Order suggests cages being installed in water over 4 metres deep, effectively giving clearance of as little as 3 m of water above some cages. Many young and inexperienced sailors train in the area, and inversions are common. Concerns were raised particularly of crews becoming entrapped and potentially at risk of drowning.
- Potential risk of anchors becoming entangled in cages from all forms of boating activity, including those associated with the RIBs and marks utilised for training and racing. Potential consequences include dragging.
- Attendees feel that cages should not be placed in:
 - those areas marked on charts as safe anchorages;
 - those areas frequently utilised by novice dinghy sailors;
 - in or adjacent to the preferred channel that links the Fairway (as discussed already in the management plan to have no cages placed within) to Weymouth and Portland National Sailing Academy and Portland Marina;
 - in mooring areas;
 - within areas with fixed marks (such as those used by Castle Cove Sailing Club), including the areas utilised for servicing and replacement; and
 - in areas commonly used for temporary race marks.
- While the areas where cages are placed will need to be marked as a hazard to navigation, concern was raised that the potential volume of cages requiring marking would mean that the markers themselves would create a hazard to navigation.

b. Fisheries-related activity

The current management plan indicates that only one work boat will be in operation at any one time, however, a timetable of activity would be useful. The plan notes that the applicant would 'time such activities to avoid the busiest spells of use of the area by others', and that much of the harvesting work would take place between December and March. However it also notes that creeling would mostly take place in the warmer months, scallop harvesting is to be year round, and cleaning of oyster cages may take place every 6 weeks. Other Several Orders have provided a seasonal plan with when activity will take place as well as the number of boats and hours of operation for each activity including reseeding, harvesting, etc. Clubs and training centres would value more detailed information to determine the likely impact on their activities.

Much of the fisheries-related activity is proposed to be carried out by divers. While divers are working in the fisheries areas, concern has been raised as to the realistic area that will need to be avoided by boaters for the safety of both the divers and recreational boaters. As the area is utilised by novice boaters, safety issues are obviously of high concern. The current management plan notes there typically being three divers in the water. The water in the Several Order area is shallow, and the presence of divers may exclude boaters from large areas in order to maintain diver safety.

The harvesting of oysters appears to utilise a different type of boat but there are no details as to how large this would be, and how much of an area would consequently be excluded for use. More information is needed as to how would this then differ if the suggested pumped water based harvesting method is used in the future.

c. Marker buoys

As mentioned previously, we still do not support the use of markers simply to identify the presence of the Order area. Markers should only be used as aids to navigation and to demark particular hazards to navigation.

d. Further points for clarity

The current management plan notes that the mussels will 'attach themselves to surfaces'. Clarity is sought as to whether 'surfaces' refers to the existing substrate, or whether further material will be placed on the seabed.

We welcome the proposal for formal methods of communication between the applicant/creelers and the recreational boating community as regards placing of oyster cages and locations of creeling and spat collection activity. Further details as to the format of this should be confirmed with the affected clubs and training centres and included within the management plan.

In summary, the most significant concern raised by the local recreational boating community relates to the oyster cages and the placing of these in relation to maintaining safety for boaters, particularly as the whole area of the Order is utilised by many boaters of varying skill levels.

Clarity is also sought in relation to fisheries-related activity, with a likely timetable of activity including the seasons, days and hours of boat operations. This particularly relates to safety issues with the divers working in the Order area, and how this may impact on recreational boaters.

We continue to draw attention to our concern regarding marker buoys.

Yours sincerely,

A handwritten signature in cursive script, appearing to read 'Anne Goldsack', written in black ink.

Anne Goldsack
RYA Planning & Environmental Officer